Brighton & Hove City Council

Overview & Scrutiny

Title:	**Environment & Community Safety Overview & Scrutiny Committee**
Date:	**23 January 2012**
Time:	**4.00pm**
Venue	**Council Chamber, Hove Town Hall**
Members:	**Councillors:** Morgan (Chair), Sykes (Deputy Chair), Cobb, Gilbey, Hawtree, Janio, Jones and Littman
Contact:	**Mary van Beinum** **Overview & Scrutiny Support Officer** 01273 - 29 - 1062 mary.vanbeinum@brighton-hove.gov.uk

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ENVIRONMENT & COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE

AGENDA

Part One **Page**

ENVIRONMENT & COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE

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For further details and general enquiries about this meeting contact Mary van Beinum, (01273 - 29 - 1062, email mary.vanbeinum@brighton-hove.gov.uk) or email scrutiny@brighton-hove.gov.uk

Date of Publication - Friday, 13 January 2012

Agenda Item 32

PROCEDURAL BUSINESS.

A. Declaration of Substitutes

Where a Member of the Commission is unable to attend a meeting for whatever reason, a substitute Member (who is not a Cabinet Member) may attend and speak and vote in their place for that meeting. Substitutes are not allowed on Scrutiny Select Committees or Scrutiny Panels.

The substitute Member shall be a Member of the Council drawn from the same political group as the Member who is unable to attend the meeting, and must not already be a Member of the Commission. The substitute Member must declare themselves as a substitute, and be minuted as such, at the beginning of the meeting or as soon as they arrive.

B. Declarations of Interest

(1) To seek declarations of any personal or personal & prejudicial interests under Part 2 of the Code of Conduct for Members in relation to matters on the Agenda. Members who do declare such interests are required to clearly describe the nature of the interest.

(2) A Member of the Overview and Scrutiny Commission, an Overview and Scrutiny Committee or a Select Committee has a prejudicial interest in any business at meeting of that Committee where –

(a) that business relates to a decision made (whether implemented or not) or action taken by the Executive or another of the Council's committees, sub-committees, joint committees or joint sub-committees; and

(b) at the time the decision was made or action was taken the Member was

(i) a Member of the Executive or that committee, sub-committee, joint committee or joint sub-committee and
(ii) was present when the decision was made or action taken.

(3) If the interest is a prejudicial interest, the Code requires the Member concerned:-
(a) to leave the room or chamber where the meeting takes place while the item in respect of which the declaration is made is under consideration. [There are three exceptions to this rule which are set out at paragraph (4) below].
(b) not to exercise executive functions in relation to that business and
(c) not to seek improperly to influence a decision about that business.

(4) The circumstances in which a Member who has declared a prejudicial interest is permitted to remain while the item in respect of which the interest has been declared is under consideration are:-

(a) for the purpose of making representations, answering questions or giving evidence relating to the item, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise, BUT the Member must leave immediately after he/she has made the representations, answered the questions, or given the evidence,

(b) if the Member has obtained a dispensation from the Standards Committee, or

(c) if the Member is the Leader or a Cabinet Member and has been required to attend before an Overview and Scrutiny Committee or Sub-Committee to answer questions.

C. Declaration of party whip

To seek declarations of the existence and nature of any party whip in relation to any matter on the Agenda as set out at paragraph 8 of the Overview and Scrutiny Ways of Working.

D. Exclusion of press and public

To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

NOTE: Any item appearing in Part 2 of the Agenda states in its heading the category under which the information disclosed in the report is confidential and therefore not available to the public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.

BRIGHTON & HOVE CITY COUNCIL

ENVIRONMENT & COMMUNITY SAFETY OVERVIEW & SCRUTINY COMMITTEE

4.00PM 31 OCTOBER 2011

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

Present: Councillors Morgan (Chair); Sykes (Deputy Chair), Cobb, Gilbey, Hawtree, Janio, Littman and Summers

PART ONE

24. PROCEDURAL BUSINESS

24a Declarations of Substitutes

Councillor Summers was substituting for Councillor Jones

24b Declarations of Interests

There were none

24c Declaration of Party Whip

There were none.

24d Exclusion of Press and Public

In accordance with section 100A(4) of the Local Government Act 1972, it was considered whether the press and public should be excluded from the meeting during the consideration of any items contained in the agenda, having regard to the nature of the business to be transacted and the nature of the proceedings and the likelihood as to whether, if members of the press and public were present, there would be disclosure to them of confidential or exempt information as defined in section 100I (1) of the said Act.

RESOLVED: That the press and public be not excluded from the meeting.

25. MINUTES OF THE MEETINGS HELD ON 5 SEPTEMBER AND 14 OCTOBER 2011 (CALL-IN)

25.1 The minutes of the meeting held on 5 September and call-in meeting held on 14 October were agreed and signed by the Chair.

26. CHAIRS COMMUNICATIONS

26.1 Councillor Morgan said that following the ECSOSC workshop on flood risk, a visit for to the Marina had been arranged for 18 November. Details would be sent to Members.

26.2 Deputy Chair Councillor Ollie Sykes told the meeting that Defra had replied to concerns from the flood risk workshop that he had Chaired. Defra had set out the national approach by the Environment Agency towards National Rail on provision of data; this is being followed up for the next stages of the flood study.

27. PUBLIC QUESTIONS/ LETTERS FROM COUNCILLORS/REFERRALS FROM COMMITTEES/NOTICES OF MOTION REFERRED FROM COUNCIL

27.1 There were none.

28. MONITORING THE SCRUTINY REVIEW OF 20MPH LIMITS/ZONES

28.1 The Road Safety Manager Phil Clarke presented an update to the Committee following the Scrutiny Review of 20mph limits, summarising the three areas of on-going work.

28.2 The Speed Limit Review (A&B Class roads) and (20mph Speed Limits) had both been reported to 4 October Environment Transport and Sustainability Cabinet Member meeting. CMM had given permission to consult on reducing the speed limit from 30mph to 20mph on stretches of roads near schools in Neville Road, Hove and Trafalgar Road, Portslade. Permission to consult was also given on two pilot 20mph areas around schools and residential roads in Portslade and the Stanford area. The cost of the pilots areas was approximately £80,000, funded via the Local Transport Plan, LTP3. Replies to both consultations were now being received.

28.3 Taking into account the scrutiny recommendations, a City centre 20mph limit was being investigated, with a view to extending it to more residential and commercial areas. Scoping work was anticipated during this financial year. Future funding would be policy decisions.

28.4 The Road Safety Manager pointed out that the areas agreed for consultation are residential/commercial and not main routes and so already have relatively low average vehicle speeds. A small reduction in road speed can make a significant difference to the effect of any collision. The proposals were speed limits, rather than ‘zones’ or ‘traffic calming,’ which involved engineering works that would be more costly and potentially more unsightly.

28.5 He went on to answer questions. Regarding signage, as suggested by the Department for Transport, roundels on the road surface can be used, to reduce signposts to the legal minimum requirement. If speed reductions were to be time-relevant (eg day/night), then more street signage would be required. There were no plans to monitor vehicle emissions in the pilot areas although this was done at various locations across Brighton & Hove. Removal of speed limits had not been costed, as the intention was to extend areas and make them more affordable. New signage in extended areas would use the roundels as repeaters with the terminal signs being re-used.

28.6 It was clarified (report para 4.1) that the scrutiny panel visited Portsmouth where the UK’s first city centre ‘blanket’ 20mph area had been introduced. Initial results from that scheme

(from low numbers) showed a small reduction in average speeds but did indicate that signs and road surfaces can influence driver behaviour for the better.

28.7 Asked about the extent of consultation, the Road Safety Manager explained the standard Traffic Regulation Order (TRO) process; proposed amendments are published in the local newspaper and across a wide area, not only the areas directly affected. He would check on consultation with specific groups such as Local Action Teams and Local Residents' Associations.

28.8 The Police did not expect to be involved in activity-directed enforcement; however would enforce blatant disregard of speed limits if they encountered it.

28.9 Regarding how pilot areas were selected the Road Safety Manager said suitable significant areas around schools were chosen, in line with scrutiny recommendations, to test methodology and effectiveness. Collision hotspots are kept under continuous review for possible engineering or education measures; they are not being ignored in favour of the pilot schemes.

28.10 Members welcomed in principle steps to encourage lower speeds in residential areas. It was agreed to ask for a progress update on implementation at a suitable time, with an invitation to the Cabinet Member for Transport and the Public Realm. Further questions included identifying the most suitable pilot areas, to make best use of available funding; and the extent of consultation including with LATs and residents' associations.

28.11 An answer to a question on the timescale for replacing road traffic signals throughout the City would be provided in writing.

28.12 RESOLVED: (i) that the report be noted
(ii) that the Cabinet Member be invited to provide an update with a further monitoring report to a future meeting.

29. COUNCIL-SUPPORTED BUS SERVICES

29.1 The Road Safety Manager Phil Clarke introduced the report on Permission to Tender for Council-supported bus network, agreed at 4 October CMM with the caveat that he had limited knowledge of the subject as it was not his area of expertise. He was standing in for the Transport Planning Manager who had given his apologies for today's meeting.

29.2 He said the current contracts that expire in September 2012 were issued in 2007/2008 following a decision that combined consultation with permission to tender. This round differed in that the two stages had been separated.

29.3 Asked how the tendering exercise linked in with decisions on the Council's budget, the Strategic Director Place pointed out that Members would decide on which bus routes would be supported, based on available resources and Best Value.

29.4 In reply to a question on how routes were deemed to be commercially viable or otherwise, Members heard that bus operators had reliable estimates of costs and incomes; and the Council encouraged bus operators to look at new routes as well as established ones.

29.5 Members asked further questions on: the costs of the tendering exercise; how many bus companies were likely to apply; deregulation of bus services; and to what extent the analyses are based on historical data and on future predictions, for example how future journey options to key destinations (eg hospital) are considered.

29.6 Members queried whether additional routes, such as a supported bus route along the seafront eg from Portslade to the City Centre could be included.

29.7 Written replies would be provided to Members on determining viability of routes, how companies evaluate bus routes, forecasting journey demand and the potential for the Council to establish its own bus services, perhaps via an 'arms length' or other organisation.

29.8 ECSOSC agreed to question supported bus routes as part of the scrutiny of the budget process.

29.9 RESOLVED (1) that the report be noted
(2) that the supported bus network be included as part of scrutiny of the Council's 2012 – 2013 budget proposals.

30. MONITORING SCRUTINY REVIEWS: SERVICES FOR VICTIMS OF SEXUAL VIOLENCE AND OLDER PEOPLE AND COMMUNITY SAFETY

30.1 The Commissioner Community Safety Linda Beanlands presented monitoring reports on the outcomes of two Community Safety scrutiny reviews; Services for Older People and Victims of Sexual Violence.

30.2 The Scrutiny Review of Older People and Community Safety had led to the inclusion for the first time, of Older People as an additional priority in the current Community Safety Crime Reduction and Drugs Strategy 2011 – 2014. Each of the Strategy's 13 Priority Areas typically has a dedicated lead officer, however it was not until October 2011 that an officer had specific responsibility to deliver the recommendations on Older People. There had therefore been less significant progress than anticipated, although much work in relevant areas for instance on domestic violence, sexual violence and acquisitive crime, was helping to improve the safety of older people as well as other age groups.

30.3 Members also heard of initiatives in Portslade that helped to bring younger and older people together.

30.4 There had been much progress on support services for victims of sexual violence, including setting up a Sussex-wide Sexual Assault Referral Centre with clinical and forensic services to meet immediate service needs. Joint Commissioning arrangements with the Police, NHS and East and West Sussex County Councils were established to give good value for money. As well as statutory providers, other local support services are commissioned to provide good opportunities for reporting, and for receiving medical support. There was much

support from independent Third Sector agencies such as the Survivors Network, Women's Centre, Rise, Oasis, Threshold and Mankind.

30.5 The Chair Councillor Warren Morgan mentioned Age UK being well placed in the Community to help support older people. He asked about the implications of substance misuse with regard to support services.

30.6 The Commissioner said drinking to excess was an added risk factor for both perpetrators and victims and it was a key aim to try to reduce this risk. In line with scrutiny recommendations it was important to ensure the City's workforce, especially police, housing officers etc, were able to identify alcohol as a factor in dealing with individuals. Referral pathways were now more developed to improve the connection between services.

30.7 She answered questions on the high number of victims and on improving awareness, reducing social tolerance and promoting healthy relationships through City events (eg one in November) and via schools and colleges. Social density had not been shown to be a factor in incidences of the crime, though could potentially exacerbate severity.

30.8 Members were pleased at progress made against the scrutiny recommendations and requested case studies to show examples of the systems now in place.

30.9 RESOLVED that a further progress update be provided for both the scrutiny reviews, including case studies.

31. FUTURE OF CRIME AND DISORDER SCRUTINY

31.1 The Head of Scrutiny Tom Hook presented a report on the future of Crime and Disorder Committees in light of the Police Reform and Social Responsibility Act 2011 that established Police and Crime Commissioners (PCC) and Police and Crime Panels (PCP). He outlined the current situation and the protocol between the Community Safety Forum and ECSOSC, and made proposals for future scrutiny of community safety issues (section 7 of the report). Members were invited to comment on these, and on local arrangements for accountability of Sussex Police.

31.2 Commissioner Community Safety Linda Beanlands confirmed that the PCPs would hold the PCC to account; this was an entirely separate function from providing scrutiny of the Community Safety Partnership that would remain with the local authority. Good working relationships would be needed between all the functions however. She also confirmed that there was no change (under the Crime and Disorder Act) to the requirement for a Community Safety Partnership ('Safe in the City', chaired by the Council's Chief Executive and the Police Chief Superintendent) or to Councillors responsibilities for community safety in the City.

31.3 The Chair Councillor Warren Morgan explained that Councillor Ben Duncan the Cabinet Member, Chair of the Community Safety Forum and the (one of 17) current Member of the Sussex Police Authority, was unwell and had given his apologies.

31.4 He said Community Safety was a high priority in Brighton & Hove and a Crime and Community Safety Scrutiny body was of great importance in dealing with local people's concerns. He referred to the dilemma of the requirement for a Crime and Disorder Committee - the role presently undertaken by ECSOSC - when the Community Safety Forum attended by

Communities of Interest, being Chaired by an Executive Member , was unable to perform this formal scrutiny function.

31.5 Members generally felt that, compared with adjoining areas also covered by Sussex Police, Brighton & Hove's position in terms of population and business, was dissimilar enough to warrant additional representation for the City on the PCP.

31.6 The Commissioner advised that the Secretary of State had approved greater PCP representation elsewhere. A transition team of officers and relevant Members including from Scrutiny, was being proposed to establish appropriate arrangements with partner authorities.

31.7 On behalf of the Committee the Chair Councillor Warren Morgan said there were many options. More discussion was needed. He asked that the transition team draw up proposals with a 'road map,' including for community safety scrutiny, for consideration by January Governance Committee.

31. 8 RESOLVED that the transition team of officers and relevant Councillors including scrutiny representation develop proposals for the Sussex Police and Crime Panel and for scrutiny of crime and disorder in Brighton & Hove, for agreement at January 2012 Governance Committee.

32. ECSOSC DRAFT WORK PLAN

32.1 Members noted the draft ECSOSC work plan.

33. ITEMS TO BE REFERRED TO CABINET MEMBER, CABINET OR FULL COUNCIL

33.1 There were none.

The meeting concluded at 5.30pm

Signed Chair

Dated this day of

ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE

Agenda Item 36
Brighton & Hove City Council

Subject:		**Taxi licensing and the Hackney Carriage Office**		
Date of Meeting:		**23 January 2012**		
Report of:		**Head of Planning and Public Protection**		
Contact Officer:	Name:	Tim Nichols	Tel:	x2163
	E-mail:	tim.nichols@brighton-hove.gov.uk		
Wards Affected:	All			

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

1.1 At Environment and Community Safety Overview and Scrutiny Committee on 5 September 2011, after discussion, the Committee agreed to ask for a further report to 23 January 2012 ECSOSC, to deal with the 6 bullet points listed in the request for scrutiny (appendix 1), plus additional concerns from the FED centre for independent living referred to in a separate note including: Engagement with all taxi service users; Disabled facilities for taxi pick-up at the football stadium; Information in the Blue Book about accessibility for disabled users; Openness and transparency of policy and practice on enforcement; e.g. suspension of licences/delay in related health checks; Frequency and method of licence renewal; Value for Money of driver training course; Length/consistency of Hackney Carriage Office knowledge tests and reason for separate tests for Brighton and Hove; Data and record keeping e.g. on number of WAV licences, driver training, checks on equipment such as ramps and swivel chairs; Efficient work practices; Types of WAV that are acceptable for a licence application; The high standard (and therefore cost) of the City's taxi fleet, compared with competitiveness for key Council school and other contracts; and the level of taxi service and waiting time for wheelchair users and disabled passengers.

2. RECOMMENDATIONS:

2.1 That members resolve either:
(a) To set up a scrutiny panel as requested
(b) To submit the matter to Licensing Committee to continue to develop taxi licensing policy to improve services for disabled passengers

3. BACKGROUND INFORMATION

3.1 As requested at 5 September 2011, Head of Regulatory Services and Chair of Licensing Committee attend and answer various lines of enquiry.

3.2 Engagement with taxi service users.

Terms of Reference for Taxi Forum now agreed at Licensing Committee on 17 November 2011. Its membership has been expanded and includes the Arab Taxi Association. New Terms of Reference will require publishing minutes on the Council Website.

3.3 Disabled Facilities for taxi pick up at football stadium

A taxi drop-off facility space was identified at the planning stage and the infrastructure has been built but it is not formally appointed as a rank. The Stadium has a separate transport management group. There is a drop off point at stadium rear. Pre-booked private hire vehicles are available for egress. The football club has its own arrangements to improve access.

The football club report that they allow drop off and collections via Village Way when appropriate. They are not going to prioritise any cab firm, either Brighton licensed or Lewes licensed. The football club retain the right to allow cabs onto the property or refuse them access on safety grounds.

The formal drop off point if taxis do not want to wait in traffic getting to Village Way, is next to the signals junction meaning a 3 minute walk to the ground for customers, which is via the railway underpass and turning left along the wide and well-lit footway. This is outside the Keep development site.

The football club have no wish to prioritise between Lewes and Brighton firms by providing a specific rank for either. They are private property and the site straddles both authorities. They will allow cabs on to site for any non-match event to drop off and pick up and will allow cabs on site for pick-ups after matches when it is safe to do so taking into account pedestrian movement. This will generally be sometime between ½ an hour and an hour after the game has finished.

3.4 Information in the Blue Book about accessibility

This information was agreed at Licensing Committee on 17 November 2011 and summarised in the Licensing Committee's Action Plan in appendix 1.

3.5 Policy and Practice

There is a published Licensing Committee resolved enforcement policy for licensing.

3.6 Delay in health checks

There are delays arising from communication between GPs, hospital consultants, DVLA doctors and the Council's medical advisor. There is an extant contract with the medical advisor until March. Officers are monitoring response times. Officers are also considering agreeing a standard response time although delays are often out of the control of the council's medical advisor.

3.7 Frequency and method of licence renewal

Driver licences are renewed annually currently. Within the forum, GMB raised the possibility of triennial licences. That request is not current. Officers have no strong view but estimate little or no saving because annual checks would still need to be made.

3.8 Value for money of driver training course

One of the main local private hire operators, Brighton & Hove Radio Cabs, are requiring all drivers to undergo BTec training voluntarily. It is understood that funding was identified with the help of training provider PDM. BTec training for all existing drivers, free to the driver, is offered by Radio Cabs in conjunction with PDM. A voluntary approach is being taken although legal advice has been sought on whether the licensing authority could require additional training for licensed drivers. PDM have already trained 100+ of our drivers in the BTec and have another 200 booked. The council accepts any BTec (Role of professional taxi drivers) qualification from any accredited provider. Locally, the main provider has been PDM. Skills UK and Reward Training also offer this training.

3.9 Knowledge Tests

Traditionally, testing has been phased between Brighton and Hove. This is the method preferred by the knowledge schools as this reflects their teaching methods.

3.10 Data and record keeping

Officers wish to improve electronic record keeping but are subject to corporate prioritisation. The Council has not yet identified a date for migration of taxi records to the corporate software programme. Currently officers can manually list and count numbers of Wheelchair Accessible Vehicles (WAVs). Checks can be made on those saloon hackney carriages that have been transferred and are required to be accessible at next renewal date.

3.11 Driver training

New drivers are required to undertake BTec, (includes ESOL), DSA driving standard test, routes and knowledge. Medical CRB checks are also made. PDM are able to run the disability unit of BTec separately if necessary. Officers have supplied accommodation for existing drivers

to undertake this training on a voluntary basis. This facility is open to all drivers. There is no licensing requirement to require existing licensed drivers to undertake further training. No conditions can be placed on the hackney carriage driver licences. Officers have therefore encouraged this voluntary approach.

3.12 Checks on ramps, swivel chairs etc.
Compliance test for renewing vehicle licences requires such checks on an annual check. Officers will also check these matters at renewal and as part of vehicle inspection and enforcement.

3.13 Efficient work practices
The Hackney Carriage Office works to a very tight budget. Its income from licence fees is highly regulated. The service is accredited to ISO9001:2008 quality standard. Service provision is formally reviewed annually and constant regard is given to continual improvement.

3.14 Licensable Wheelchair Accessible Vehicles
There are two potential approaches: either define vehicle models as characterised by London and Liverpool or issue guidelines for a wider range of vehicles. Brighton & Hove issue guidelines in the Blue Book along with a non-exclusive list of vehicles already licensed. The Licensing Authority use DfT guidance as the basis for specification. However, vehicles meeting M1 EC whole type approval are accepted.

3.15 Standard and cost of fleet
Licensing Committee approved policy and conditions set minimum standards for vehicles, as published in the Blue Book. These have been developed in consultation with the trade over the years. They are subject to constant review and amendment.

3.16 Council contracts
Contractual matters are not licensing considerations and are subject to the Council's Contract Standing Orders.

3.17 Service levels and waiting times for wheelchair users and disabled passengers
The next Significant Unmet Demand survey will be undertaken in 2012 and additional questions will be asked concerning WAV waiting time discrepancies and benchmarking with other local authorities.

3.18 Equalities Act 2010
Sections 160-167 have not been commenced. No taxi accessibility regulations have been made and the prescribed percentage of WAVs has not been set for any area. However, locally the proportion of WAVs is increasing by managed growth and requiring transferred hackney carriage saloons to be accessible on renewal. Vehicles with 5 or more passengers now have to be accessible (Licensing Committee approved in 2008 fare review), which addresses both hackney carriage and private hire fleets. The Law Commission is now leading this work.

3.19 Commitment to increase percentage
The Licensing Committee's Equality Action Plan is appended (Appendix 1).

3.20 Transport Select Committee
The Law Commission is now leading this work including cross border hiring. The primary purpose of taxi licensing is public safety and therefore the passenger's safety and comfort are likely to be central to any legislative reform. There is a public consultation planned from May 2012.

3.21 Driver training and information
Licensing Committee on 17 November 2011 agreed Blue Book (taxi licensing policy) should include DfT advice on EA2010 duties and list of designated vehicles. Driver training is dealt with at 3.8 above.

3.22 Licence fees: commitment by Local Authority
Licence fees are highly regulated by S53 and 70 Local Government (Miscellaneous Provisions) Act 1976. They were reviewed and reset by Licensing Committee on 17 November 2011. Fees must be set at a level that is reasonable with a view to recovering particular identified costs.

3.23 Towards the end of 2011 the Local Government Ombudsman decided not to investigate a complaint that the Council was failing to meet its Equalities Duties in relation to the provision of taxis for disabled people and specifically that it had failed to progress the recommendations arising from the Equalities Impact Assessment. The Ombudsman was not persuaded there was evidence that an injustice has been caused to either the complainant or to disabled people within Brighton. This was because she was satisfied the Council was taking reasonable steps to implement the recommendations of the Equalities Review.

4. CONSULTATION

4.1 Procurement Officers were consulted.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:
5.1 There are no direct financial implications arising from this report.

Finance Officer consulted: Karen Brookshaw Date: 09/01/12

Legal Implications:
5.2 As reported on 5 September 2011 to ECSOSC.

Equalities Implications:

5.3 The Council's Equality Action Plan is appended as recently updated. Please also see 3.23 above.

Sustainability Implications:
5.4 None arising from this report.

Crime & Disorder Implications:
5.5 None arising from this report.

Risk and Opportunity Management Implications:
5.6 Licensing Policy is overseen by Licensing Committee.

Corporate / Citywide Implications:
5.7 Licensing Committee has delegated authority to set taxi licensing policy.

SUPPORTING DOCUMENTATION

Appendices:
1. Updated action plan
2. Request for scrutiny

Documents in Members' Rooms: NONE

Background Documents:
1. NONE

Agenda Item 36 Appendix 1

Updated action plan from Committee report recommendations September 10 (updated L Committee 17 November 2011)

Date & Number	Recommendation	Agreed action
10/09/10 1	That the committee notes the position regarding the Equality Act 2010 and its possible implications.	Complete.
2	That the committee notes the current BTEC qualification will not be available to new applicants after 30th September 2010 and approves the replacement entry-level qualification for new drivers.	Complete.
3	That the HCO, working in partnership with The Fed Centre for Independent Living and other stakeholders, develop the framework for a Certificate of Professional Competence, research providers, and report with firm proposals by the end of March 2011.	Please see 2 above. There is a need to establish the baseline of equalities training and consider how to ensure continuing professional development. Once established, a licence condition would be imposed once the hackney carriage office has legal clearance. There has been difficulty identifying an accredited provider. The three taxi operators agreed to develop their own scheme at taxi forum on 17 June 2011. Hackney Carriage Officer has identified a provider for a disability awareness course. This can be offered to licensed drivers but compulsion may present legal implications.
4	That the HCO implement changes and improvements to the current complaints process to ensure that it is accessible and that all complainants are provided with clear, detailed responses.	Complete

5	That the Committee approve the maximum age limit for a WAV, be increased from 10 to 12 years, subject to it passing two vehicle tests per year, and that the Existing Conditions are amended accordingly with the rider 'all vehicles over ten years old shall be required to pass two vehicle inspections each year' be added.	Complete
5A	That the Committee approve the removal of the maximum age limit for newly licensed vehicles, subject to the maximum age limit appropriate to that vehicle.	Complete.
6	**Withdrawn**	N/A
7	That the views and evidence provided by all contributing parties to this report be brought to the attention of officers dealing with the school transport contracts.	Complete.
8	That the Committee approve all new hackney carriage vehicle licences and licences which are renewed following a transfer should conform to the Conditions of Fitness as prescribed by the Public Carriage Office (ie purpose built London type hackney carriage vehicles) or be for wheelchair accessible vehicles with M1 ECWVTA.	Officers are aware of 13 transfers that have resulted in new WAVs in the fleet. Taxi licensing is migrating to a corporate software system which should allow transparent reporting of data. Absolute numbers of WAVs stand currently at 145 and increasing. There are another 13 that need to become WAV at next renewal which will take us to 29% and with the 5 extra in May will make 30%.
8A	That the Committee approves the licensing of rear loading M1 ECWVTA WAVs.	Complete
8B	That the Committee approves the immediate release of five new hackney carriage vehicle licenses.	Complete
9	That the Committee approves that CCTV approved by the Director is installed in all vehicles	Complete. CCTV is expected to be phased in during 2012/13 by licence condition.

	(a) upon application for a new vehicle licence on or after 1 April 2012, or (b) on annual renewal of a vehicle licence falling between 1 April 2012 and 31 March 2013	
10	That the Committee approve a pilot scheme initially for one-year, to publish contact details of WAV drivers prepared to take bookings, and where an operator's licence is required for a single vehicle, that operator's licence is provided free of charge.	Complete
11	That the Committee note the promotion of accessible taxi/PHV services to taxi voucher recipients in January 2011.	Complete.
12	That the Committee note the proposal to support National Customer Service week by promoting WAVs and demonstrating access features of vehicles.	Complete
13	That the Committee supports in principle a Star Rating for operators, the detail to be developed by the HCO in partnership with the Federation of Disabled People.	Preliminary work has been undertaken by discussion in taxi forum. This action may not be possible due to trade reservations. There are concerns over transparency and objectivity (criteria for awards).
14	That the Committee ask The Fed Centre for Independent Living to make a detailed proposal as to how they would envisage undertaking 'mystery shopping' setting out any costs that might be incurred.	The Fed Centre for Independent Living to investigate.
15	That the Committee require 'Right to Work' checks carried out on application for drivers' licences.	Complete.
16	That the Committee approve in principle, interior seat advertising in licensed WAVs.	Complete.
13/05/11 New	Equalities Act 2010 preparation for a list of designated vehicles. New offences are created concerning failure to pick up, failure to carry	Complete.

17	safety and overcharging.	
New 18	Taxi forum terms of reference.	Complete – agreed at committee
05/07/11 New 19	Blue Book to include DfT advice on EA2010.	Complete – agreed at committee.
New 20	Blue Book to include list of designated vehicles.	Complete – agreed at committee
New 21	Use TfL guidance to use as consultation base set for WAV specification locally.	TfL guidance is used as consultation basis. Complete. The Equalities Action Plan was reported to committee on 17 November 2011. EA S160 has been identified via Transport Minister for non-implementation. Taxi accessibility regulations are not expected. This may affect specifying accessible vehicles. Licensing Authority current position is to allow any vehicles meeting M1 crash criteria and general public safety.
New 22	Record Certificate of Competence on driver records.	BTec includes training which would update competency. Awaiting ICT delivery with migration to new software.
New 23	Trawl for funding for training.	None available to local authorities.
New 24	Circulate Bracknell's and Streamline's advice to Forum for comments. This advice is aimed at safe transport of passengers including disabled passengers.	Complete.

Agenda item 36 Appendix 2

The FED and Brighton and Hove Streamline would like to suggest a scrutiny of Taxi Licensing and the Hackney Carriage Office.

This is very timely because there are number of things the panel might want to consider:

- The taxi provisions in the Equalities Act. There is an issue locally regarding the proportion of wheelchair accessible vehicles (WAVs) in the fleet.

- The commitment from the administration to increase the percentage and how they might implement that commitment.

- The inquiry into taxi/ph licensing by the Government's Transport Select Committee, looking at cross-border hire problems caused by private hire vehicles picking up passengers outside of the area in which they are licensed, again a local problem.

- The Select Committee is also considering issues with regard to passenger safety which is an issue for all stakeholders.

- Driver training and information.

- Commitments by the administration to ensure the licence fees reflects the true cost to the council.

Geraldine Des Moulins 29 June 2011

[Further information was enclosed for Members: 24 August 2011]

ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE	**Agenda Item 37** Brighton & Hove City Council

Subject:		**Waste Management Strategy Review**	
Date of Meeting:		**CABINET 8 December 2011 Item 141** **ECSOSC 23 January 2012**	
Report of:		**Strategic Director, Place**	
Lead Member:		**Cabinet Member for Environment & Sustainability**	
Contact Officers:	**Name:**	**Jan Jonker**	**Tel: 29-4722**
	E-mail:	**jan.jonker@brighon-hove.gov.uk**	
Key Decision:	**Yes**	**Forward Plan No: CAB24613**	
Wards Affected:		**All**	

FOR GENERAL RELEASE

This report to 8 December Cabinet is being presented to ECSOSC for comment before the matter is considered again by Cabinet in Spring 2012.

1. SUMMARY AND POLICY CONTEXT:

1.1 The council adopted its Municipal Waste Management Strategy in March 2010. Since then a number of drivers for the strategy have changed, in particular:

- The council's priorities and the city's One Planet Framework
- The Government's national review of waste policy published in June 2011
- Proposed changes to waste legislation including the Landfill Allowance Trading Scheme (LATS)
- Proposed EU recycling targets for the UK which may have implications for local authorities.

1.2 The existing strategy also sets out a commitment to carrying out further research on food waste collections to inform any future decisions.

1.3 In light of these developments the waste strategy has been reviewed. This report seeks permission to consult on the revised strategy which is attached as Appendix 1. It also seeks agreement on a number of key decisions prior to final sign off of the review post consultation.

2. RECOMMENDATIONS:

That ECSOSC comment on the proposals.

2.1 That Cabinet grants permission to consult on the revised Municipal Waste Strategy as set out in Section 4 and that on completion of the consultation the revised strategy be brought back to Cabinet for approval.

2.2 That Cabinet notes the evidence base which has been collated to inform the development of a food waste trial.

2.3 That Cabinet approves in principle the submission of a bid for Interreg funding for 50% of the costs of a food waste trial in 2013/14. Should funding be required in 2012/13 to meet Interreg timescales a further report identifying sources of finance will be brought to Cabinet.

2.4 That Cabinet agrees that officers pursue further potential funding streams for food waste collections, including Interreg funding and Department for Communities and Local Government (DCLG) funding and that the Strategic Director, Place is given delegated authority to submit funding applications in consultation with the Cabinet Member for Environment and Sustainability, and the Cabinet Member for Finance.

2.5 That Cabinet notes on going emphasis on waste minimisation, focussing particularly on food waste continuing to work with the Food Partnership.

2.6 That Cabinet grants approval for the development of a business case for the collection of commercial waste and recycling.

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

Progress on Existing Strategy

3.1 The existing Waste Management Strategy and Action Plan were adopted in March 2010. Since then a lot of progress has been made in implementing the plan including:

- Improvements in customer satisfaction, which are at their highest levels for street cleansing, refuse collection and recycling
- Roll out of recycling bring sites for drinks cartons and small electrical items
- Improvement of recycling bring sites
- The establishment of a Waste Advisory Group and Community Waste Forum to assist in the implementation of the strategy
- Consultation is under way on proposals to trial communal recycling in the city centre. Depending on the outcome of the consultation the trial will be implemented in the spring of 2012.

3.2 Recycling rates at the Household Waste and Recycling Sites have increased from 48% to 52% but overall recycling and composting rates have declined slightly since 2008/09 from 29.5% to 27.7%. While many councils have seen recycling rates drop, believed to be largely due to the economic downturn, Brighton & Hove's performance is low when compared to many other cities.

3.3 Reducing waste is the most sustainable option for waste management. Total waste arisings have declined and total residual waste per household has dropped from 610kg per household in 2008/09 to 602kg/hh in 2010/11.

3.4 The strategy considered options for food waste as it comprises a third of the waste thrown away by weight and is key to significantly improving recycling rates. Further research has been done to inform future management of this waste

stream and this report seeks approval to pursue external funding for a food waste collection trial.

Drivers for Review

3.5 The strategy is being reviewed in light of some of the changes set out below.

3.6 The One Planet Framework developed by the City Sustainability Partnership which the council as a key partner is working towards. It sets out priorities for the city in relation to sustainability and identifies actions to deliver improvements. It is based around ten principles:

- Zero carbon
- Zero waste
- Sustainable transport
- Local and sustainable materials
- Local and sustainable food
- Sustainable water
- Natural habitats and wildlife
- Culture and heritage
- Equity and fair trade
- Health and happiness

3.7 The strategy review seeks to incorporate the principles and actions surrounding *zero waste* and local and *sustainable materials* so that it becomes the delivery mechanism for these two aspects of the One Planet Framework.

3.8 The government waste review and changes to legislation all seek to encourage greater integration of the management of household and commercial waste. Fines for councils for disposing of too much waste to landfill under the Landfill Allowance Trading Scheme are due to be abolished by 2012/13. Landfill tax, which applies to waste collected by the private sector as well as councils, will be the main fiscal incentive to discourage landfill disposal. These changes create a more level playing field for the private and public sector in providing commercial waste service.

3.9 The EU framework directive on waste requires member states to achieve 50% recycling of household waste by 2020. In the UK individual local authorities have not been set individual recycling targets. However Part 2 of the proposed Localism Bill gives ministers power to pass EU fines down to local authorities, although these provisions have been significantly tightened to ensure that this will only happen after a full review by an independent panel.

Changes as Result of Review

3.10 The revised strategy continues to focus on waste minimisation recycling and composting and the action plan has been updated to reflect this. The two main changes as a result of the review are:

- Increase recycling rates for household waste further to help deliver the OPL framework targets on waste and reduce risks of fines being passed down to the council for not having done enough to increase recycling rates in line with the EU waste framework directive
- Assess the feasibility of the council providing commercial refuse and recycling collections as well as collections from schools and council offices. Previously

LATS meant it was not financially viable for the council to be involved in delivery of these services.

3.11 The targets in the strategy have been increased from 45% to 50% by 2020/21 and to 70% by 2025. These targets are ambitious, more than doubling the existing recycling rate. The 2025 target is in line with the One Planet Framework targets for household waste. The UK Targets for One Planet Regions state:

''By 2025 at least 70% of domestic waste by weight will be reclaimed, recycled or composted. Ideally no more than 2% of waste by weight will be sent to landfill''

Increasing Recycling Rates & Food Waste Collection

3.12 While some further increases in recycling can be delivered through the existing service, a significant increase can now only be achieved by targeting new materials. Options to collect more dry recycling on the kerbside (particularly mixed plastics) are being explored and are dependent on reliable, sustainable end markets for the material.

3.13 Food waste minimisation will continue to be a focus of the strategy working with the Food Partnership. However food waste makes up a third of the waste stream by weight and needs to be collected separately in order to achieve the targets in the original strategy, and those set out as part of this review. In order to inform a decision on food waste collections, extensive research has been carried out which has been reviewed by an independent consultant. Because many authorities are now collecting food waste a significant evidence base exists to help inform development of this service. Advice from Waste Resources Action Programme (WRAP) has also been received. The council has been working with Lewes District Council sharing research and data.

3.14 An updated Life Cycle Analysis (LCA) has also been carried out. The research and the LCA are attached as Appendices 2 and 3.

3.15 The main findings of the research are that:

- Food waste collections are now widespread throughout the UK; many authorities collect food waste weekly and residual waste fortnightly
- Anecdotal evidence suggests that collecting food waste separately results in waste minimisation as householders become more aware of how much food they throw away
- The amount of food waste collected per household is higher, and participation rates are higher if residual waste is collected fortnightly
- Recycling rates increase if residual waste is collected weekly
- The tonnage of food waste collected per household is generally lower on more densely populated areas and in more deprived areas.

3.16 The LCA compared two scenarios for food waste collection and treatment – one using anaerobic digestion and one using in vessel composting - against the baseline of no separate collection with waste being treated at the Energy from Waste facility in Newhaven. The model assumed food waste is collected from suburban properties which currently have a weekly refuse collection. The revised collection service would consist of weekly food waste collection and fortnightly refuse and recycling collection.

3.17 The LCA concluded the difference between separate collection and treatment of food waste through anaerobic digestion or in vessel composting compared to the baseline is low because residual waste is not sent to landfill.

3.18 In summary the research has shown that food waste collections are well established and effective at increasing recycling rates and can have a further beneficial impact on dry recycling rates and overall waste arisings. Food waste collections would result in a net limited environmental benefit. It is therefore proposed that a trial is carried out to assess the impact of food waste collections locally.

3.19 Based on the research it is considered that food waste collections are most likely to be successful in the more suburban areas rather than in the city centre communal bin area. It is therefore proposed that a trial is implemented in the suburban areas in the first instance.

3.20 In the suburban areas the following collection scheme is considered to be the most efficient and yield the highest recycling rates:

	Current Service	**Proposed Service**
Week 1	Refuse Dry Recycling	Food Dry Recycling
Week 2	Refuse	Food Refuse
Average Collections/ Week	1.5	2

3.21 The London Borough of Bromley has implemented a similar service which has helped it reach a 51% recycling composting target in 2010/11.

3.22 It is estimated that a trial covering 6,000 households will cost up to £500,000 including set up costs and capital. A detailed, costed proposal and business case is being developed which will be presented to a future Environment Transport and Sustainability Cabinet Member Meeting for sign off. External funding to part fund the trial is being pursued.

3.23 The council has been working closely with Lewes District Council sharing research and data and further joint working will continue in areas of procurement, communication campaigns and sharing experience.

Commercial refuse & recycling collections/ collections from schools & council offices

3.24 Under the Landfill Allowance Trading Scheme (LATS) councils are at a financial disadvantage compared to the private sector. Under LATS local authorities have a number of permits for the amount of waste they send to landfill. If they exceed this amount they must purchase additional permits or face fines. The scheme discourages authorities from taking on additional waste collection services as the cost of fines exceeds any reasonable charge that can be made for the waste collection service. LATS does not apply to the private sector and its abolition in 2012/13 will make it financially more viable for the council to provide commercial waste and recycling services.

3.25 Informal discussion with businesses suggests many would be interested in a service provided by the council. The advantage of an in house service is that it will reduce the number of refuse and recycling vehicles in the busy city centre. Collections can be managed to more easily minimise the number of waste containers in the street and reduce problems associated with trade waste sacks being left out overnight and ripped open by wildlife. Businesses would have one point of contact.

3.26 The feasibility of providing a commercial service needs to be assessed.

3.27 LATS is also the main reason the council does not collect waste and recycling from schools or its own offices. Abolition of the scheme means bringing this service in house can be explored once the existing contract comes to an end in 2013. An in house service would have the advantage that it could mirror the household collection service and thus help communicating messages regarding waste minimisation and recycling.

4. COMMUNITY ENGAGEMENT AND CONSULTATION

4.1 The existing strategy was subject to extensive consultation in 2009. The Waste Advisory Group (WAG) has been consulted on the first draft of this review and their initial comments have been incorporated in to the draft document. Subject to the outcome of this meeting the review will be subject to wider consultation.

4.2 The consultation will be available on line and advertised through various channels including the web, social media and the press. Hard to reach groups will be specifically targeted as part of the consultation to get their views.

4.3 It is proposed that the consultation will run in January and February 2012.

4.3 Where service changes are proposed (as is currently the case with communal recycling) detailed consultation will be undertaken with the residents directly affected at the appropriate time.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

5.1 The strategy set out in this report seeks to reduce the amount of waste collected and increase waste recycling levels both of which will reduce the cost of future waste disposal to the council. The budget update report elsewhere on the agenda proposes making a provision of up to £0.5m in the 2013/14 budget for a

food waste collection trial. It also refers to the £250m fund set aside by the Government for a weekly collection support scheme announced by the Secretary of State for Communities & Local Government in September. Further details of the scheme and bidding process are due to be announced shortly but it may also provide some funding to support a weekly food waste collection trial. Should a successful bid for Interreg funding to support a food waste trial give rise to additional costs being incurred in 2012/13 then a further report will be submitted to Cabinet to identify appropriate funding sources in next year including ways to bring forward funding from 2013/14. Any future proposals to introduce a commercial waste collection will be backed by a full business case and would as a minimum be at no cost to the council.

Finance Officer Consulted: Mark Ireland Date: 24 November 2011

Legal Implications:

5.2 The Municipal Waste Management Strategy seeks to improve the Council's performance within the legal framework which governs the Council as a Waste Collection and Disposal Authority. In relation to commercial waste, s45 1(b) of the Environmental Protection Act enables Councils to collect and make a reasonable charge for collection and disposal of commercial waste.

Lawyer Consulted: Elizabeth Culbert Date: 15/11/11

Equalities Implications:

5.3 A screening Equalities Impact Assessment (EIA) has been produced for the strategy review. Specific aspects of the action plan will subject to detailed EIAs.

Sustainability Implications:

5.4 The strategy review identifies opportunities to significantly improve recycling and composting in the city and is critical to improving overall sustainability. It is also one of the delivery mechanisms for the OPL Framework targets on waste and sustainable materials.

Crime & Disorder Implications:

5.5 The strategy review has no significant implications for crime or disorder.

Risk and Opportunity Management Implications:

5.6 Section 4 of the Waste Strategy Review sets out risks and opportunities which the action plan seeks to address.

Public Health Implications:

5.7 The strategy review has no implications for public health. Any service changes will be subject to a detailed risk assessment.

Corporate / Citywide Implications:

5.8 The proposals in the review are critical to help deliver improvements to the city's sustainability which is a corporate priority.

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

6.1 Options for food waste collection have been considered in detail as evidenced in this report and the appendices. Proposals for a trial will be presented to a future Environment Transport and Sustainability Cabinet Member Meeting.

6.2 Options for commercial waste collections and collections from school and office buildings will be evaluated as part of the development of the business plan.

7. REASONS FOR REPORT RECOMMENDATIONS

7.1 The reasons for the recommendations are set out in the body of the report.

SUPPORTING DOCUMENTATION

Appendices:

1. Brighton & Hove City Council Waste Strategy Review

2. Food Waste Research Document

3. Food Waste Life Cycle Analysis

Documents in Members' Rooms

None

Background Documents

1. One Planet Regions – UK Targets - Bio Regional March 2011

2. One Planet Living Framework for Brighton & Hove City Sustainability Partnership/ Best Foot Forward.

3. Screening Equalities Impact Assessment – Waste Review

4. Food Waste Strategy (see elsewhere on Cabinet agenda)

Brighton & Hove City Council Waste Strategy Review

December 2011

Review completed following consultation with Brighton & Hove Waste Advisory Group

Section 1 - Background

Introduction

Brighton & Hove City Council adopted its Municipal Waste Management Strategy in 2009.

This document reviews the council's strategic priorities and future needs in relation to waste management taking in to account:

- The Council's priorities as set out in the Corporate Plan 2011-14,
- The One Planet Living Framework, Climate Change Action Plan and Community Strategy;
- The outcome of the Government's review of national waste policy published in June ;
- Proposed changes to legislation including the definition of waste and the Landfill Allowance Trading Scheme.

The Corporate Plan is an essential part of the council's policy and delivery planning framework and ensures that the day to day work of the council is focused on local priorities.

The One Planet Living Framework has ten priorities which include zero waste and sustainable materials which are addressed in this review.

The Climate Change Action Plan identifies what the council will do to address the causes of climate change and to prepare the city for its impacts, as required by the Climate Change Act 2008.

The Community Strategy is the overarching strategic document for the city. It is the result of partnership working between statutory sector providers, the community & voluntary sector, businesses, residents and the local authority.

The Government review of waste policy encourages local authorities to take a more strategic approach to waste management and move away from dealing with commercial and industrial waste and household waste separately as is currently the case. It does not place any extra responsibilities on local authorities in relation to this, so any changes will be made very much on a voluntary basis.

Historically, the council has mainly had responsibilities for household waste. This means there is more data and evidence available on this waste stream than there is for commercial and industrial waste. This is reflected in this document.

This strategy clearly states what the council's aims and objectives are with regards to reducing waste within Brighton & Hove. However, delivering improvements can only be achieved if residents, businesses and visitors work together and also manage their own wastes more sustainably.

Definition of Waste

The two types of waste referred to in this document are:

- Municipal Solid Waste (MSW), which is waste for which he local authority has direct responsibility which consists mainly of Household Waste as well as street cleansing and beach cleansing waste.

- Commercial and Industrial Waste (C&I Waste), also referred to as Trade Waste which includes waste from shops, offices, hotels and restaurants.

The composition of MSW and C&I waste is very similar consisting of things like packaging and food waste, whether that comes from shops, restaurants or households. The definition of municipal waste is expected to change as set out below.

Construction and Demolition Waste (C&D Waste) is not considered in detail in this document as its composition, when and where it is generated, and treatment and disposal options are very different to those of C&I waste and MSW. C&D waste is considered in the section relating to waste management infrastructure.

Existing Waste Management Strategy

Brighton & Hove City Council adopted its waste management strategy in 2009. A copy of the strategy is available on line at www.brighton-hove.gov.uk. The strategy set seven clear policies as summarised below:

Policy 1	Service Quality and Engagement with Residents Businesses and Communities
Policy 2	Waste Minimisation and Prevention
Policy 3	Increasing Rates of Reuse
Policy 4	Increasing Recycling Rates
Policy 5	Increasing Composting Rates
Policy 6	Residual Waste
Policy 7	Waste from Businesses and Other Organisations

Each policy was supported by a specific action plan. The 2009 strategy set out to achieve the targets below.

Target	2008/09 Performance	2010/11 Performance	2012/13	2015/16	2020/21
Recycling & Composting	29.2%	27.7%	32%	40%	45%
Energy Recovery	21.39%	26.4%	56.1%	55%	53%
Landfill	49.39%	46.0%	11.6%	5%	2%
Kg household waste per person	421	410	415	402	383
Kg residual waste per person	301	297	310	270	225

The table below summarises the 2009 Action Plan and the progress made to date. A detailed plan covering the next two years is set out at the end of this report.

2009 Action Plan - Progress To Date

Outcome	Action	Target	Progress to Date
Policy 1: Service Quality and Engagement with Residents Businesses and Communities			
Improved partnership working with stakeholders in the city	Establish Waste and Recycling Group consisting of members of the public and other stakeholders to review and test aspects of service	Group established by June 2010 with agreed terms of reference	**COMPLETE** A strategic Waste Advisory Group (WAG) has been established to help inform future strategy, including this review. Progress is reported to City Sustainability Partnership (CSP). and the remit of the WAG has increased to include inform the One Planet Living Framework.
Effective engagement with community groups, residents associations etc to share service information and drive the waste agenda forward	Establish more links with relevant groups and identify opportunities	Regular engagement with groups.	**COMPLETE** A project based Community Waste Forum (CWF) has been established (January 2011) to lead on community partnership projects to reduce waste, increase recycling reuse and composting. The forum has launched several projects including community composting and communications project.
Reduce call waiting times for customers phoning contact centre	Improved service reliability and call handling in contact centre	10% reduction in waiting time from April 2010 to March 2011	**COMPLETE** Call waiting times reduced from 30 seconds in April 2010 to less than 20 seconds buy March 2011. Percentage of callers hanging up before their call is answered is less than 2% and response times to emails and letters is less than 2

			days,
Improve quality and accessibility of information on web site	Ensure information on web site is clear and up to date and promote use of website	Daily updates of website to improve quality of information, levels of usage and satisfaction.	**COMPLETE** – Web site re designed and re written. Web hits increased from 6231 hits in February 2010 to 22205 in December 2010. Online reporting increased by 50%. Cityclean won National Customer Service Award for its Communications Strategy and has been shortlisted for European Contact Centre and Customer Service Awards.
Communicate effectively with residents	Ensure communications are clear, concise, friendly and written in plan English	Achieve Crystal Mark Standard (independent standard for clear communication) by August 2010	**COMPLETE** Crystal Mark Standard achieved in 2010. New communications channels launched in addition to improvements to web site including Facebook and Twitter. Communications campaign targeting students launched.
Improve reliability of refuse and recycling service		Reduce number of missed bin by 70% and collect 95% of missed bins within 24 hours of reporting	**PROGRESSING** We have been successfully reducing the number of missed bins reported with a reduction heading towards 50%. We are looking at ways in which reports made by residents are 100% accurate by explaining current collection guidelines better. At this time approx 75% of missed bins are collected within 24 hours of reporting.
Measure how satisfied our	Carry out regular customer satisfaction monitoring and target	Annual report on performance, first report	**COMPLETE.** Monthly Team Leader CS reports are now in place. These figures will

customers are with the services and target areas for improvement	areas for improvement	by March 2011	shortly be published online.
Improve cleanliness of streets	Ensure streets are free from litter	10% 2010/11 9% 2011/12 9% 2012/13 % of streets less than satisfactory Low score = cleaner streets	**COMPLETE/ONGOING.** 2010/11 = 7%. (NI has been abolished but data still being collated internally). Distribution of 'flyers' effectively enforced to prevent litter.
	Remove chewing gum from the city's streets	Commence removal of gum	**PROGRESSING** – Some gum removal has taken place in the BID area and along high traffic areas along the seafront.
	Ensure streets are free from graffiti	8% 2010/11 7% 2011/12 7% 2012/13 Low score = less graffiti	**COMPLETED/ONGOING.** 2010/11 = 2%. (NI has been abolished but data still being collated internally) The dedicated team has continued to clear graffiti. X taggers have been prosecuted and the council continues to work with local graffiti artists in some areas to develop wall art to prevent tagging.
Services accessible to all residents	Work with stakeholders to implement actions from Equalities Impact Assessments and publish assessments on line	Stakeholders to be consulted by June 2010, priority actions to be delivered by March 2011.	**COMPLETED/PROGRESSING** - EIA on all main services and we have action plan to complete more EIA with any major changes in service. Consultation with Federation of Disabled People and the Older Peoples Council to deliver a review of the assisted

			collection service. There is a case study about this work in appendix 1.
All staff able to provide residents with meaningful information about waste and cleansing services and the waste agenda	Ensure staff have in depth knowledge of the waste agenda (eg what can and cant be recycled and why) and are skilled in sharing this with residents	Phased training program to be completed by December 2010	**COMPLETE** – All staff took part in two training sessions led by Brighton University to provide them with more practical knowledge about the waste agenda. Recycling and refuse collectors have been provided with customer contact cards to improve communications between them and the public for questions that cannot be answered on the spot.
Policy 2 : Waste Minimisation			
Increase the use of real nappies	Supply starter packs for real nappies	On-going	**COMPLETE** - Use of real nappies was reviewed and in house provision was not best option due to problems with keeping right variety and level of stock. Instead specialist suppliers have been approached and can be accessed through council website. Information on website has been improved and made more accessible
	Assess business case for employing real nappy advisor to attend events, hold talks, visit hospitals etc.	Business case to be completed and evaluated December 2011	**COMPLETE** – It is not considered that the business case for a real nappy advisor stacks up. Instead information on the website has been improved with direct links to specialist suppliers
Provide information on waste minimisation and	Monitor extra waste placed beside wheelie bins set targets for reduction prioritising low performance areas	On-going monitoring and communication targeted campaign from April 12	**PROGRESSING** – Refuse and recycling rounds data being collated and will be published on line. Communications will be targeted at those areas with highest levels

recycling to householders who produce excessive amounts of waste			of residual waste/ lowest levels of recycling.
Reduce amount of food waste thrown away	Food waste reduction campaign developed and delivered in partnership with the Food Partnership and the Harvest Project.	Campaign to run from March 2010 – April 2011. Reduce amount of food wasted by 10%	**COMPLETE/ EXTENDED** Extensive outreach campaign led by food partnership consisting of cooking demonstrations, advice and tips, promotion of food waste composters and a poster campaign on council refuse vehicles. Campaign extended to July 2012.
Raise the profile of packaging waste by working with trading standards to identify and challenge manufacturers of products which are over packaged	To establish programme of reporting and enforcement with Trading Standards and work with local retailers	Investigation of at least 5 cases of over packaging per quarter from 2010	**PROGRESSING/EXTENDED –** To be incorporated into a waste prevention web page. Residents will contact Consumer Direct who will pass cases on to Trading Standards. Consumer Direct will screen calls and therefore may not be possible to investigate 5 cases. We will be able to see how much has been reported which will give a good indication to awareness created and profile raised.
Reduce overall waste arising at the two HWRS	Continue enforcement of trade waste into the sites, set waste restricting policy in line with the controlled waste regulation	No trade waste entering HWRS's.	**ONGOING**
Prevent illegal disposal of waste including business waste	Monitor illegal disposal of trade waste including disposal in communal bins and take appropriate enforcement action abuse		**ONGOING** Waste enforcement against persistent offenders is on-going.

Policy 3 Increasing Rates of Re Use			
Work with charity and community organisations to increase the amount materials re-used	Engage with charities and community groups to establish interest and working standards, in form of partnership framework	Agree partnership framework by October 2010	**PROGRESSING** Re-use groups play active part in Community Waste Forum (CWF) with a number of re-use projects being progressed. Work is under way with re-use charities to establish textile banks across the city to benefit local charities. The WAG has requested that the council undertake more face to face communications about reuse and that it should collaborate with key stakeholders to make reuse easier for residents and create an accessible directory that is not only available online. Plans to encourage charities, schools or other organisations to use scrap shops and encourage scrap shops to open in the city.
Promote online reuse schemes	Scoping exercise to gauge what schemes are available the effectiveness of these schemes	To have a circulation list to promote by April 2011. Divert 200 residents per month	**PROGRESSING** The WAG has suggested that in addition to original plans, the council should integrate and publish current available data on reuse.
	To increase profile of re-use groups in Brighton & Hove/ increase re-use rates	Charities 'map' for Brighton & Hove by April 2011	**PROGRESSING** Re use charities promoted through web site and social media. Production of map is in progress.
		Re-use feature with charities in Citynews	**TO BE COMPLETED**
	Set up a bring and take day, a large one day re-use event.	Work with free-cycle and other re-use groups to set up – measure effectiveness by	**PROGRESSING** Annual re-use days being planned with Brighton University and Sussex University for end of term 2012

		monitoring items and use conversions to get tonnages diverted. Between March 2011 April	
	Arrange a large fashion swap. Involve local business sponsors and community groups to run and manage event.	Raise profile of textile recycling and re-use. Engage community and voluntary groups. March 2011 - April 2012	**PROGRESSING** 'SWISH' project scoped and being progressed through Community Waste Forum.
	Run clothes restyling workshops with community groups and youth centres	Raise profile of textile recycling and re-use. Engage community and voluntary groups Start March 2011	**ON HOLD** A lot of work being done with community/ charity sector at present to increase re-use. This project is on hold as other projects have been prioritised as they are likely to have a more significant impact.
Improve bulky waste collection service to increase re-use and offer an improved service to residents	Specify and cost new style service	Implement new service subject to funding in March 2011	**PROGRESSING** Soft market testing exercise completed. Tender documents produced with support from WRAP (Waste & Resource Action Program) to ensure contract maximises reuse and recycling and enables voluntary sector organisations to bid for the work. This tender includes the recycling of larger electrical items. Expect to let contract May 2011 (Add to AP)
Extend re-use schemes at both HWRS	Introduce a re-use scheme at Brighton HWRS	Establish scheme by February 2011 with community sector partner. Raise profile and use of both re-use	**PROGRESSING** Re-use scheme will be established at Brighton site when site is redeveloped (anticipated in 2012).

		facilities	
	Extend paint reuse schemes to both sites	Establish scheme by November 2010	**COMPLETE** - Paint re-use scheme established at Hove HWRS in 2010. Similar scheme will be established at Brighton HWRS subject to room being available after site is redeveloped (anticipated in 2012)
Policy 4 Increase Recycling Rates			
Improve facilities for recycling of bulky cardboard	Review location and facilities for bulky cardboard collection across city/ assess how service can best be provided and bring in house or tender	To have in place an improved service for bulky cardboard at bring sites by November 2010	**COMPLETE** – service brought in house
Maximise materials and quality of facilities available at bring sites	Expand street litter recycling scheme	Phase 1 completed, Phase 2 to be completed by June 2010	Levels of contamination in bins very high, resulting in very low levels of recycling. Scheme put on hold and there are no plans for extending it at present.
	Introduce Tetrapak banks at 25% of sites	Tetrapak to be introduced by August 2010	**COMPLETE** Tetrapak banks introduced to 20 across the city.
Improve facilities for recycling of batteries and light bulbs	Work with retailers (initially through business waste forum) to establish collection schemes for batteries and light bulbs.	Dec-10	**COMPLETE** Collection points for batteries and light bulbs included on web site and kept up to date**.**
Increased number of textile bring banks	Work with charities to increase number of textile banks to ensure banks are situated at all feasible sites	Dec-10	**PROGRESSING** Working group established with local charities**,** trial established with five sites where bring banks are serviced by local charities. Proposals for extending trial so that all banks benefit local charities (currently many are established and run by

			national charities with limited benefit to the city).
Improve quality of bring sites across city/ improve signage to help increase recycling rates	Refurbish 20 sites per annum until all are completed (2013), and ensure sites are in right locations. Appropriate signage.	20 sites each in 2010/11, 2011/12, 201213	2010/11 **COMPLETE** 2011/12 **PROGRESSING**
Work with charity to introduce facilities for toy recycling	Introduce toy recycling at bring sites	Dec-10	**COMPLETE** Toy recycling banks set out at 9 sites. Proceeds benefit Rocking Horse Appeal.
Carry out trial for communal recycling in city centre to increase recycling rates	Identify trial area, work with residents throughout trial to assess whether communal recycling is effective/ increases recycling rates.	Trial one area of suitable size (5-10 streets) for one year starting in October 2011	**PROGRESSING** Proposed trial area has been identified in Brunswick/ Adelaide Ward through Community Waste Forum. Consultation on going throughout November 2011Introduce from Spring 2012 subject to consultation.
Increase recycling participation in city centre	Work with residents to identify barriers to recycling in the city centre and develop campaign to improve recycling rates.	Campaign to run from September 2010 - January 2011. Increase recycling in city centre (baseline to be measured & target to be set)	**COMPLETE** Campaign ran in 2010. Based on research main focus was on students. Research identified that lack of storage and high turnover of population were barriers to participating in recycling scheme. The communal recycling trial seeks to address these barriers

Introduce incentive schemes for kerbside recycling and flats	Research incentives schemes (review reports and best practice) and investigate if/how they can be applied/ translated across the whole city	Trial recycling incentives October 2011 for 6 months	**PROGRESSING -** Two national incentive schemes researched and evaluated. Schemes were high in outlay and high in risk to the council so were not progressed any further. Incentive schemes being explored further through the Community Waste Forum.
Increase recycling at the two Household Waste Recycling Sites	Monitor waste being disposed with general waste – disposal of recycling with general waste and Segregate plasterboard and MDF separately (subject to feasibility)	Increase recycling/ composting rate to: 45% 2010/11 47% 2011/12 49% 2012/13 51% 2013/14	**COMPLETE/ONGOING** 2010/11 recycling/composting rate stands at 52%.
Ensure as many people as possible recycle	As a last resort take enforcement action against residents who are able to recycle, have access to a reliable recycling service and recycling information, but still refuse to recycle	No specific target set, enforcement action will only be taken as a last resort	**PROGRESSING** – Measures being put in place to make recycling easier in first instance. These include improved communications and communal recycling. The CWF is investigating reward and recognition schemes for lower performing recycling areas and will ask Magpie to input. It has been suggested by the WAG that the council should investigate having recycling branding on street cleansing vehicles and to consider having space on street cleansing barrows to separate recyclable materials.
Policy 5 Increase Composting Rates			
Increase usage of home composters and food digesters	Continue promotion of subsidised composters to areas of the city that have the outdoor space	1500 bin sales 2010/11 1250 bin sales 2011/12 1000 bin sales 2012/13	**PROGRESSING** Composting promoted through Christmas mailing, work with Food Partnership and on line. Sales below target

		Divert 668t per annum (Based on WRAP calculations)	which could be due to market saturation. Action to do more targeted promotion in areas of the city where there people have homes with space to compost and link to schools (parents evenings).
Increase usage of food digesters	Subsidise food digesters and wormeries, looking particularly into the options for composting/digesters in flats	Sell 1000 digesters per annum, starting in 2010/11 for three years	**PROGRESSING** Composting promoted through Christmas mailing, work with Food Partnership and on line. Sales below target which could be due to market saturation. Action could be to include promotion at university events.
Encourage better/ more use of composters by providing clear information	Work with Food Partnership to provide practical home composting information pack and promote composting generally	Annually from Spring 2010	**COMPLETE** Composting guide produced with Food Partnership. Home composting video produced and available on website.
Promote garden waste collection for materials that can not be readily composted at home	Review options for a self funding chargeable garden waste collection	Report on options for a self funding chargeable garden waste collection service by December 2010	**COMPLETE –** Review identified that there is no business case for a self funding service as charges would be prohibitive. Community garden waste collections continue to be promoted.
Policy 6: Residual Waste Collection			
Work with University to help tackle problems associated with Studentification	Specific actions include signage on streets with high density of student housing clarifying refuse and recycling collection days, working with universities and landlords to promote service information	Actions to be completed by March 2012	**COMPLETE/ONGOING** Year one of ongoing work with universities completed in June 2011. Activities included – • Mass email to every student at the beginning and the end of the

			academic year, encouraging students to recycle properly, manage their waste and to use council facilities to dispose of bulky waste. • Banner on their internal website carrying the same messages as the email • Bus shelter posters at university buildings and shelters on bus routes to universities, posters on Big Lemon buses, posters within university buildings. • Agripa posters on the council refuse and recycling vehicles. All print communications carried the same message and information. Key contacts were established at both universities to enable extended work in 2011/12 including practical work within halls and work with Environmental Health for problem households within residential areas.
Waste and recycling planning for new developments	Continue to consult with Planning, developers and Architects to actively encourage good recycling and composting provisions for new buildings	ongoing	**ONGOING**

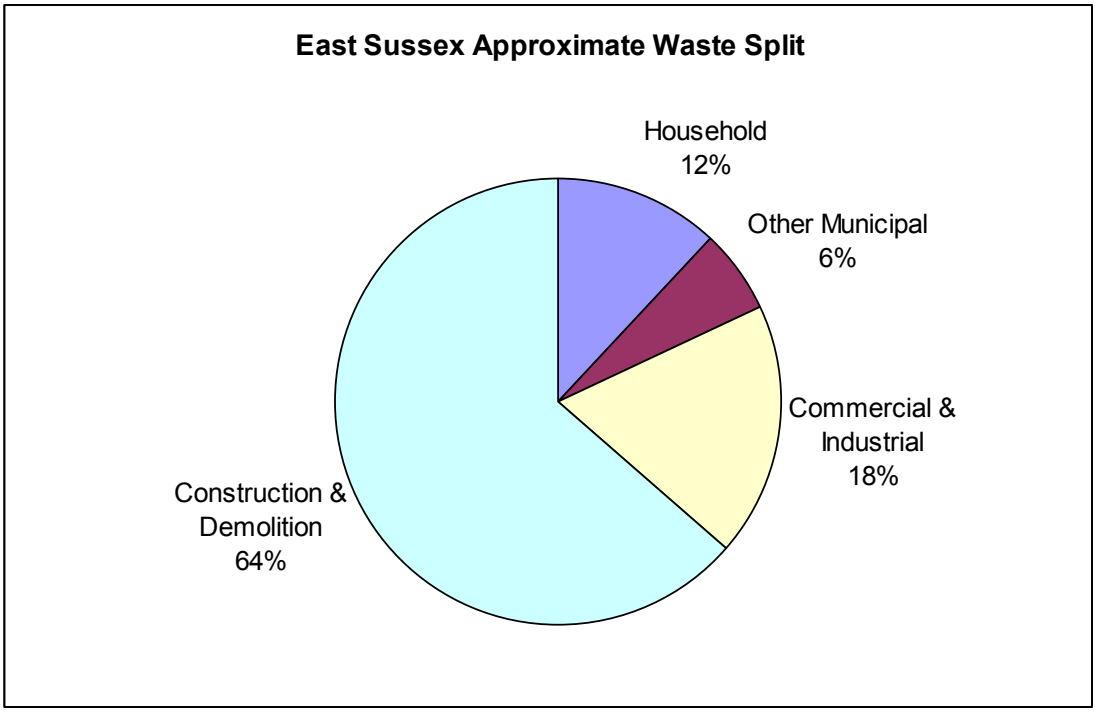
Policy 7: Waste From Businesses and Other Organisations			
Develop a strategic approach to the management of trade waste and recycling in the city	Identify strategic partners and set up a trade waste forum with contractors and businesses	Establish forum by March 2010	**COMPLETE** – Forum with key business organisations established. Plan being developed for service improvement**.**
	Develop and maintain trade waste website with strategic partners	Establish trade waste website December 2010 (subject to funding)	**COMPLETE –** Trade waste guide produced which is published on-line.
Maximise recycling of trade waste (Outstanding actions from this section have been transferred to policy 1)	To identify trade waste priorities in the city in terms of sustainability, service quality, the economy and infrastructure	Jun-10	**COMPLETE** – Review of trade waste services carried out in partnership with Brighton University. Information being used to help inform future plans for business waste.
	Establish trade waste action plan based on priorities identified	Oct-10	**PROGRESSING –** Plan being produced with business partners
	Carry out analysis of trade waste composition over a 12 month period/ analysis of collection services available	March 2011 - March 2012 subject to funding	**COMPLETE** Trade waste analysis carried out in partnership with Brighton University.
	Research the feasibility of working with the private sector to establish trade waste collection for electrical equipment and other waste streams		**PROGRESSING** – will be considered as part of overall plan for business waste.

How Much Waste is there in Brighton & Hove?

Accurate data is available regarding the total amount of household waste generated in Brighton and Hove. However estimates of the amount of commercial and industrial waste and construction and demolition waste are only available on a regional level. The table and the figure below show the approximate proportions of these waste streams in East Sussex.

Tonnages of Waste Arising in East Sussex

Municipal Waste	366,744 tonnes (2009/10) (of which 243,105 tonnes is household waste)
Commercial & Industrial Waste	367,000 tonnes per year (2006/07 data)
Construction & Demolition Waste	1,282,500 (2005/06 data)



Although exact figures are not available for Brighton & Hove, it is clear that household waste only makes up a relatively small proportion of the waste generated in the city.

Green Administration's Manifesto Commitments

The council's new Green administration has set out a number of key commitments in relation to waste and recycling. The main ones are:

- Introducing a kerbside food waste collection service
- Ambitious increases in recycling rates
- Investigate providing a commercial refuse and recycling service.

One Planet Living

Introduction

The One Planet Living approach to sustainability was developed by BioRegional and WWF[1] to help people and organisations live and work within a fair share of our planet's resources.

It uses ten guiding principles (the One Planet Living principles) as a framework to help individuals and organisations to examine the sustainability challenges that they face in a structured way, to develop appropriate solutions, and to communicate their approach.

It's based around ten principles, which are:

- Zero carbon
- Zero waste
- Sustainable transport
- Local and sustainable materials
- Local and sustainable food
- Sustainable water
- Natural habitats and wildlife
- Culture and heritage
- Equity and fair trade
- Health and happiness

Background on One Planet Living work in Brighton & Hove

During 2010/11 the City Sustainability Partnership began the process of developing a One Planet Framework for Brighton & Hove. The purpose of this was to gain a better understanding of the priorities for the city and the actions it needs to take for moving towards one planet living.

Although all 10 principles are important for the city, the partnership decided that the top 5 (in the list above) needed to be a priority for the city, In order to align this strategy with the aims and objectives of the One Planet Framework, we will be focusing on the 'zero waste' and 'local and sustainable materials' principles in this strategy. This section explains the aims for each of these two principles in further detail. It also sets out clear objectives and targets for both the Council and the wider city for meeting the One Planet Living requirements. These objectives and targets form the basis for framing our actions and ambitions within this strategy.

[1] One Planet Living is a joint initiative between WWF and BioRegional Development Group. The international initiative aims to make sustainable living affordable, attractive and easy through working with partners to support the creation of sustainable products, services and communities. 'One Planet Living' is a registered trademark of WWF and BioRegional. www.oneplanetliving.org

Zero Waste

This principle aims for a future where resources are used efficiently, reusing occurs where possible, waste levels are close to zero and ultimately zero waste is sent to landfill.

Waste and recycling targets are set for both the Councils own operations (eg its offices and schools) and for the waste collected from households and businesses.

Local Authority operations
The Council will lead by example by:

- achieving a 85% recycling rate across all its operations in 3 years;
- for council funded projects at least 95% of waste generated by Council funded construction projects to be reclaimed or recycled;

Households & businesses
For the wider city there is a target for:

- 70% of domestic waste to be reclaimed, recycled or composted by 2025
- no more than 2% of waste to be sent to landfill
- businesses and industries to be supported to achieve zero waste by 2025 through provision of recycling facilities and training, and through provision of infrastructure from the Council.

Furthermore, clean energy from waste can be employed, although this is only appropriate if treating residual waste so not compromising reuse or recycling.

Local & Sustainable materials

This principle aims for all goods and materials used, whether construction or consumer goods, are made from renewable or waste resources with low embodied energy and, where possible, sourced locally.

Local Authority operations

Goods and services
The Council will review the environmental impacts of all goods and services it procures. We will develop a robust strategy for sustainable materials and procurement and produce guidance and information on sustainable procurement activities to employees, suppliers and other partners.

Planning
The Council will endeavour to use planning powers and information to:

- promote and enable use of sustainable building materials in construction projects and to discourage the use of high impact and polluting materials

- consider life cycle impact of buildings in design so that any waste materials resulting from deconstruction or decommissioning of buildings can be recovered, re-used or recycled.

City
This strategy will enable households and businesses to reduce consumption and choose low impact goods and this will include options for:

- guidance and information on reducing the impact of goods
- promoting, providing and supporting services that facilitate the reuse and sharing of goods (particularly those with high embodied energy) i.e. Freecycle, Tiger Enterprises, Magpie, charity shops, car clubs, repair and reuse centres.

Work done so far

In 2010/11 environmental consultants Best Foot Forward (BFF) were commissioned to work on developing a One Planet Living Plan for Brighton & Hove.

In February 2011 BFF facilitated a One Planet Living workshop that was organised through the City Sustainability Partnership for the purpose of engaging key stakeholders in discussing, thinking through and planning what the adoption of a OPL approach could mean for the city and how it could inform and influence existing policies, targets and actions.

During the workshop, the discussions around the zero waste principle resulted in a range of proposed actions for waste reduction, reuse, recycling and recovery specifically within the areas including ‘domestic’, ‘commercial’ and ‘construction’. Participants recommended useful ideas, suggestions and opportunities and this review will aim to capture and reflect these where possible. Furthermore, the workshop was also able to provide useful input for the review of the Councils Economic Strategy.

Similarly, participants discussing local and sustainable materials focused largely on sustainable purchasing and categorised their ideas under the broader sectors of businesses, individuals, public and third sector organisations. Other suggestions also related to repairs/maintenance and sharing of goods, low impact buildings, and research & development of sustainable products.

Other relevant policies and strategies in Brighton & Hove

National Policy & Legislation

The Council has a statutory duty to provide a collection services for refuse and recycling from households and to manage waste arising from street cleaning. In Brighton & Hove the collection service is provided in-house by Cityclean. The Council has a contract in place with Veolia who is responsible for processing the waste once it has been collected.

Businesses are responsible for making their own arrangements for the collection and disposal of their waste and there are approximately 20 trade waste contractors operating in the city collecting and disposing of waste.

On a national level household waste and commercial and industrial wastes are generally managed in parallel, with the private sector collecting and disposing of commercial waste and local authorities dealing with household waste. As a result there is duplication in collection services and the development of disposal, recovery and recycling infrastructure.

The review of national waste policy encourages greater integration of the management of household and commercial and industrial wastes. It does not place extra responsibilities for C&I waste on local authorities. The government has also recently changed the definition of municipal wastes and abolished the Landfill Allowance Trading Scheme from 2012/13. Both these changes are expected encourage greater integration of management of household and commercial & industrial waste however the review does no place any additional responsibilities in local authorities in the area of C&I waste.

Review of Municipal Waste Definition and changes to Landfill Allowance Trading Scheme

The EU has set targets for the reduction of biodegradable *municipal waste* to landfill. Municipal waste is defined as:

Waste from households, as well as other wastes, which because of their nature and composition are similar to household waste.

According to the EU, this definition includes most commercial and industrial waste as it is similar in nature and composition to household waste, however the UK has to date restricted it to refer to waste collected by local authorities (and therefore most commercial and industrial waste has not been affected by targets to reduce landfill).

As a result of the definition only local authorities face hefty penalties under the Landfill Allowance Trading Scheme (LATS) if they do not meet targets for diverting waste from landfill. The absence of a level playing field has resulted in local authorities avoiding collecting commercial and industrial waste to reduce the risk and level of fines. In Brighton & Hove it has also resulted in collection of schools waste and waste from council offices being contracted out to a private sector company.

Under pressure from the EU, the government is now expected to amend the definition of municipal waste to include most business waste, including that currently collected by the private sector.

As part of this change the government is expected to abolish the LATS scheme by 2012/13, and rely on landfill tax (which has gone up from £40 in 2009/10 and will reach £72 by 2013/14) to meet EU landfill diversion targets.

Other Policy Considerations

The government recently consulted on options to ban certain materials from landfill disposal including:

- Paper/ card
- Food waste
- Garden waste
- Dry recyclables.

A study entitled *'Landfill Bans: Feasibility Research*' carried out by consultants Eunomia on behalf of WRAP, states that a lead-in time of between seven and ten years would be needed to introduce any bans because the UK's material sorting capacity will need to be increased first.

Assuming a lead time of seven years, Brighton & Hove will only be sending limited tonnage of waste to landfill as set out in the table below with most of the waste being diverted through recycling, composting or energy recovery. The implications of this small tonnage of waste being sent to landfill will depend on the nature of any sanctions associated with the bans. The projected tonnage expected to be disposed of to landfill is summarised below.

Projected Tonnage of Waste to Landfill 2019/20 onwards

Year	2019/20	2022/23	2025/26	2028/29	2031/32
Tonnes to Landfill	1,941	1,962	1,983	2,004	2,026

Waste & Recycling Targets

Other than diversion of waste from landfill there are no statutory waste targets for local authorities. However, the EU Waste Framework Directive includes the requirement for member states to introduce waste minimisation programmes and sets a national target of 50% for household waste recycling by 2020.

If the UK fails to meet this target, Part 2 of the proposed Localism Bill gives Ministers the power to force local authorities to pay a part of any fine passed down by the European Union to the UK. It is unclear if and how any such fines would be imposed.

If the Localism Bill is introduced in this form local authorities who do not have statutory recycling targets, but could still be fined for not doing as much as reasonably possible to increase recycling rates.

Review of the Controlled Waste Regulations

Under the Controlled Waste Regulations many types of organisations could request that the local authority collect and dispose of their waste with the authority only being able to charge for collection and not disposal. Institutions covered by the regulations included schools and educational establishments, hospitals, nursing homes and prisons. The legislation did not encourage businesses to reduce their waste or recycle, and placed an unfair burden on the local authority particularly as disposal costs increased significantly. The review of the regulations is likely to place the responsibility for waste collection and disposal with the producers of that waste. It is expected to come in to place in April 2012. Local authorities will have the option to bid for services and cover costs.

The review and the consultation all pave the way for local authorities to take a more strategic approach to managing wastes in their area rather than focusing solely on household waste. However the changes are not expected to place any extra burdens on local authorities.

Section 2 - Current Service Provision

Introduction

This section sets out how current services for household waste and commercial and industrial waste are provided including information on costs and benchmarking where this is available.

Household Waste

In-house service provision

The refuse, recycling and street cleansing service was brought in house in 2001 after a period of being outsourced.

Since coming in house the service has been transformed:

- A comprehensive recycling service has been rolled out to 98% of properties.
- Refuse has been contained by replacing black sacks.
- Efficiency has been improved these savings have been realised while rolling out a comprehensive recycling service.
- Service reliability has been improved.
- Street cleansing has improved.

The rate of staff turnover is low and most employees take pride in their work and are engaged with service development.

Recent customer satisfaction data (October 2010) shows levels of satisfaction have never been higher.

% of Residents satisfied or very satisfied with services

Service	2000	2003	2006	2008	2010	Increase from 2008 to 2010
Recycling collection	Not asked	50%	68%	67.8%	78.8%	11%
Refuse collection	46%	66%	68%	70.2%	87.4%	17.2%
Street cleansing	40%	46%	53%	67.8%	71.5%	3.7%

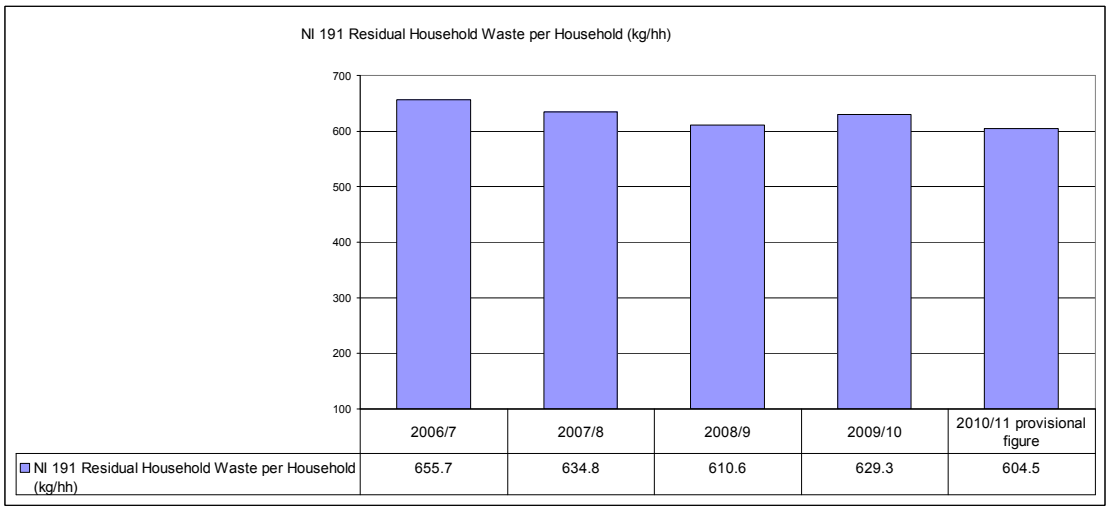
In March 2011 the service won a national customer service award for its Customer Communication Strategy in recognition for its achievements in improving customer accessibility and services.

Household waste data

The council collects approximately 107,000 tonnes of household waste per year of which currently approximately:

- 23.8% is recycled
- 3.6% is composted
- 0.3% is reused
- 27% is sent for energy recovery and
- 45.3% is disposed to landfill.

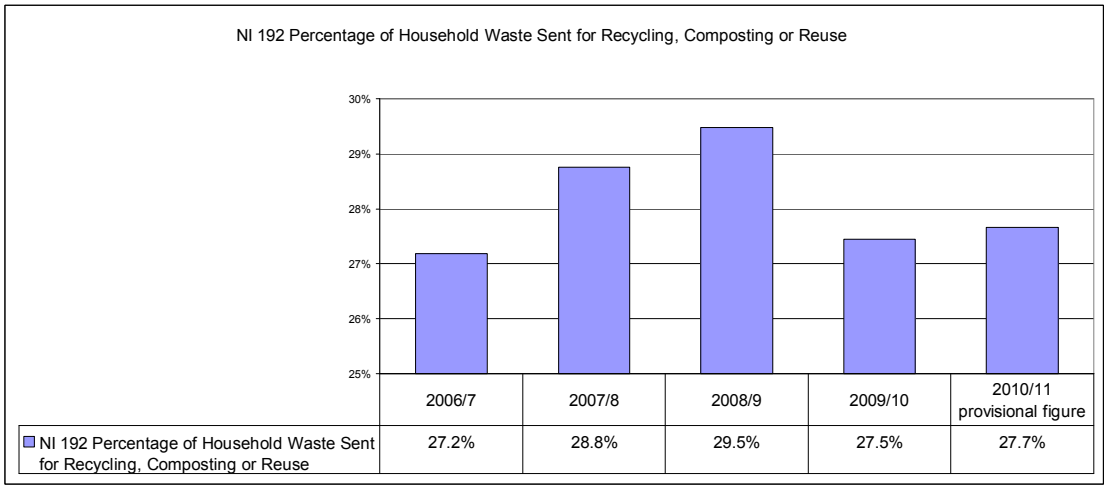
Household waste sent to landfill will reduce to approximately 4% to 2% in 2012/13 when the Newhaven Energy from Waste facility comes on line.
The total tonnage of residual waste per household (waste which is not reused, composted or recycled) has declined year on year from 656kg in 2006/07 to an estimated 605kg in 2010/11.



	2006/7	2007/8	2008/9	2009/10	2010/11 provisional figure
NI 191 Residual Household Waste per Household (kg/hh)	655.7	634.8	610.6	629.3	604.5

The tonnage of waste sent for recycling, composting or re-use has increased significantly from 16% in 2003/04 to 29.5% in 2008/09. There has been a slight decline in recycling rates in 2009/10 and 2010/11. It is difficult to identify the exact cause. Many other councils have also seen a decline in recycling which is believed to be due to a number of factors including:

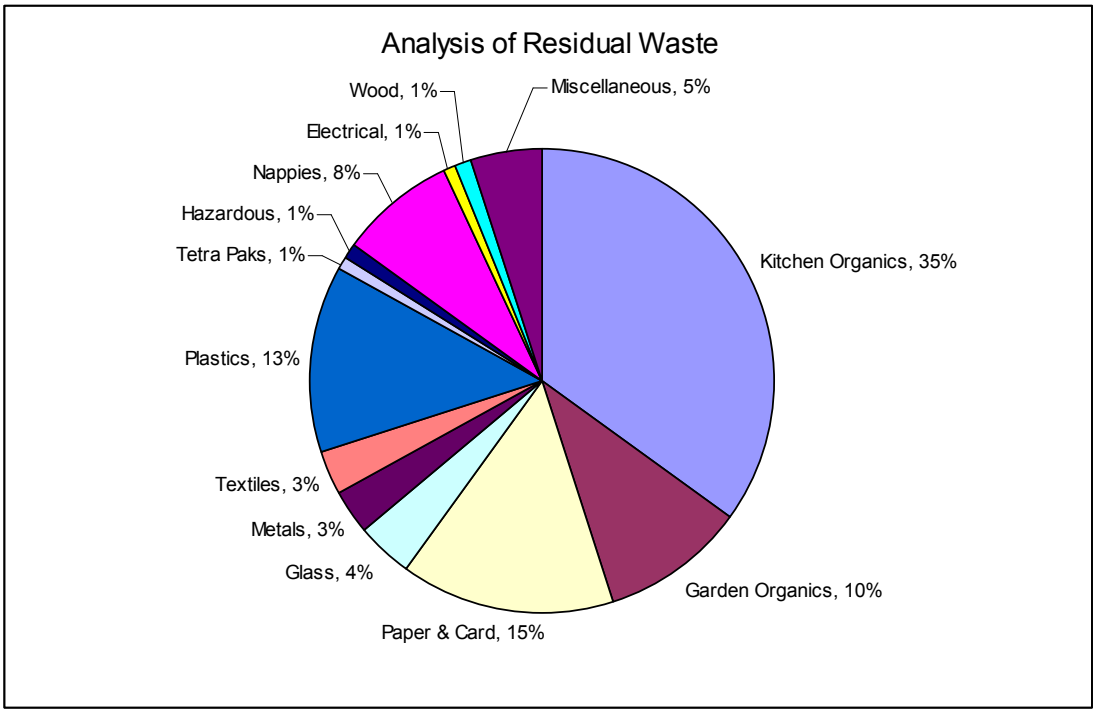
- A reduction in the amount of newspapers and magazines purchased through the recession.
- Initiatives to reduce the weight of packaging starting to take effect, for example many wine bottles are now lighter than they were in the past due to being redesigned.



Waste Analysis

In 2007 a detailed waste analysis was carried out to see what materials residents were still throwing away. The results showed that a significant proportion of the waste stream consisted of materials which are collected separately for recycling and approximately a third of the waste by weight consists of food waste.

If everyone recycled all the materials for which we provide a collection service our recycling rate would increase to 37%.



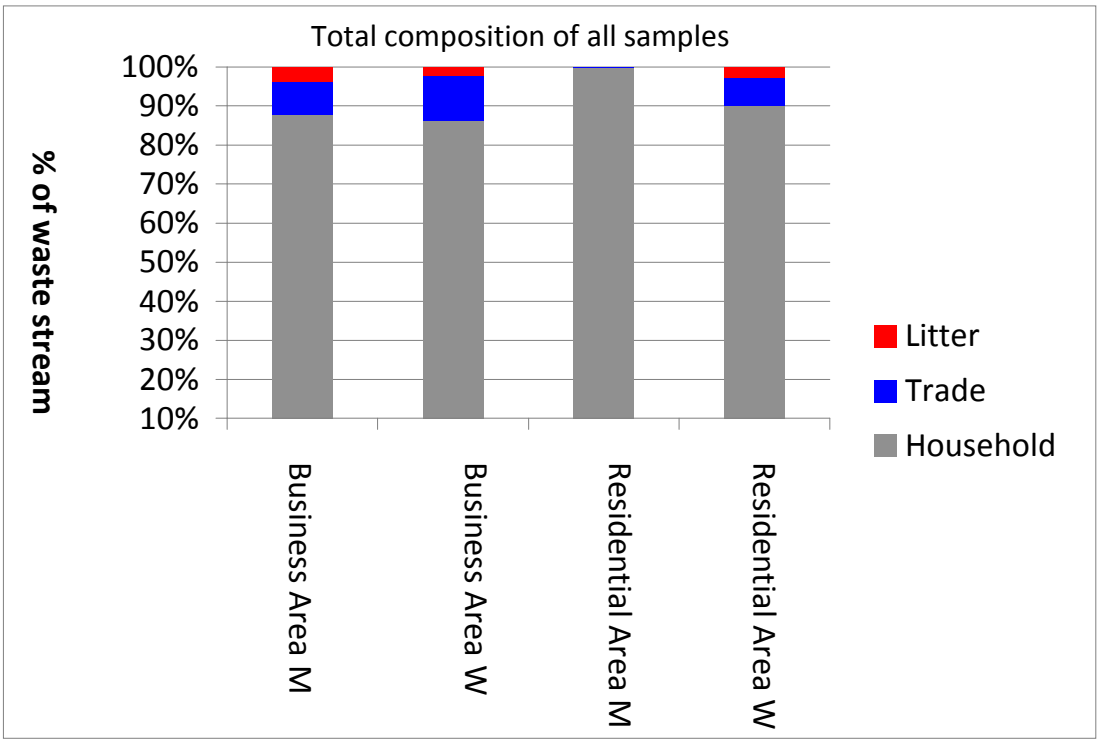
In 2011 a small number of communal bins were analysed to assess:

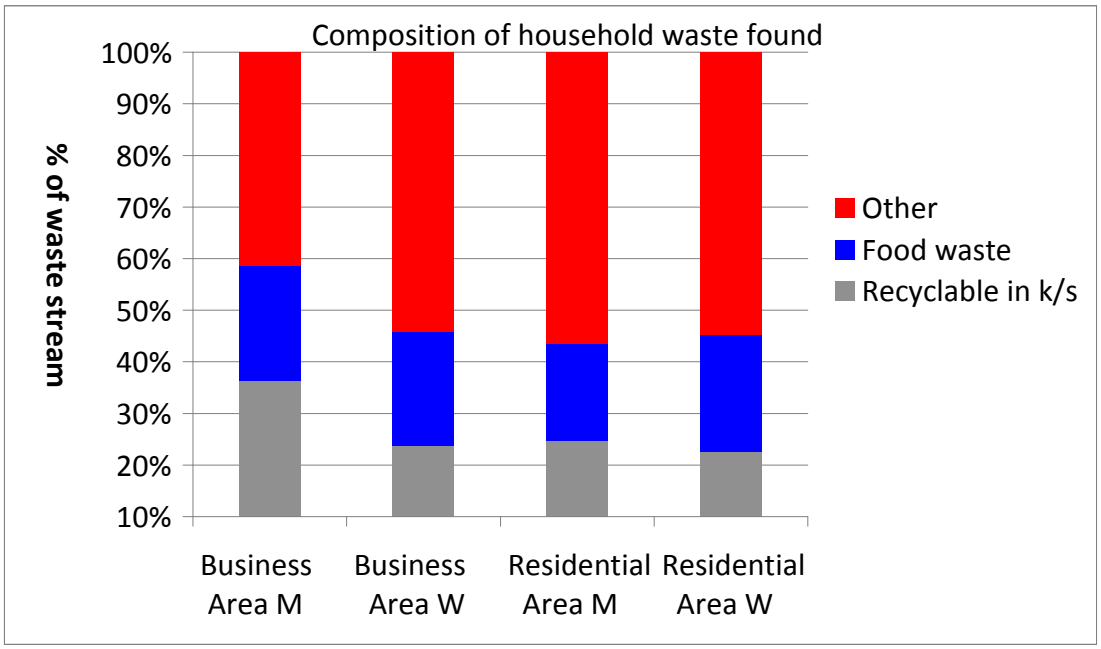
- The amount of commercial waste in the bins; and
- The amount of materials that could be recycled using the kerbside collection disposed of in the bins.

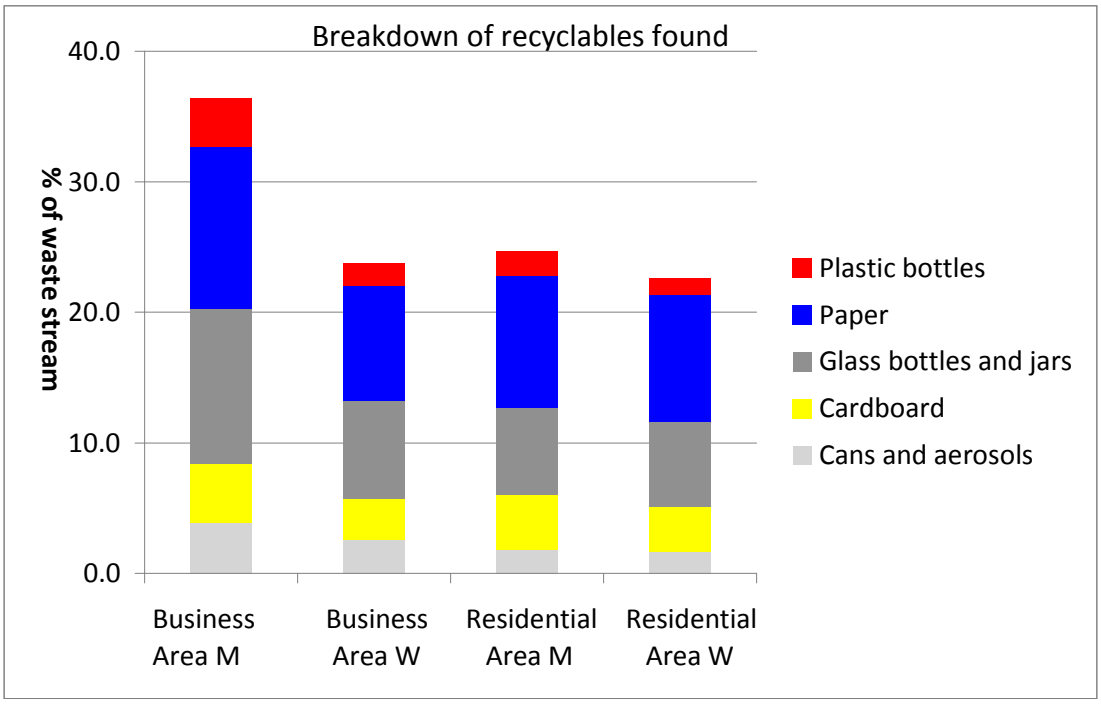
A number of bins were sampled in predominantly residential areas with no businesses, and a number in streets with both residential properties and businesses.

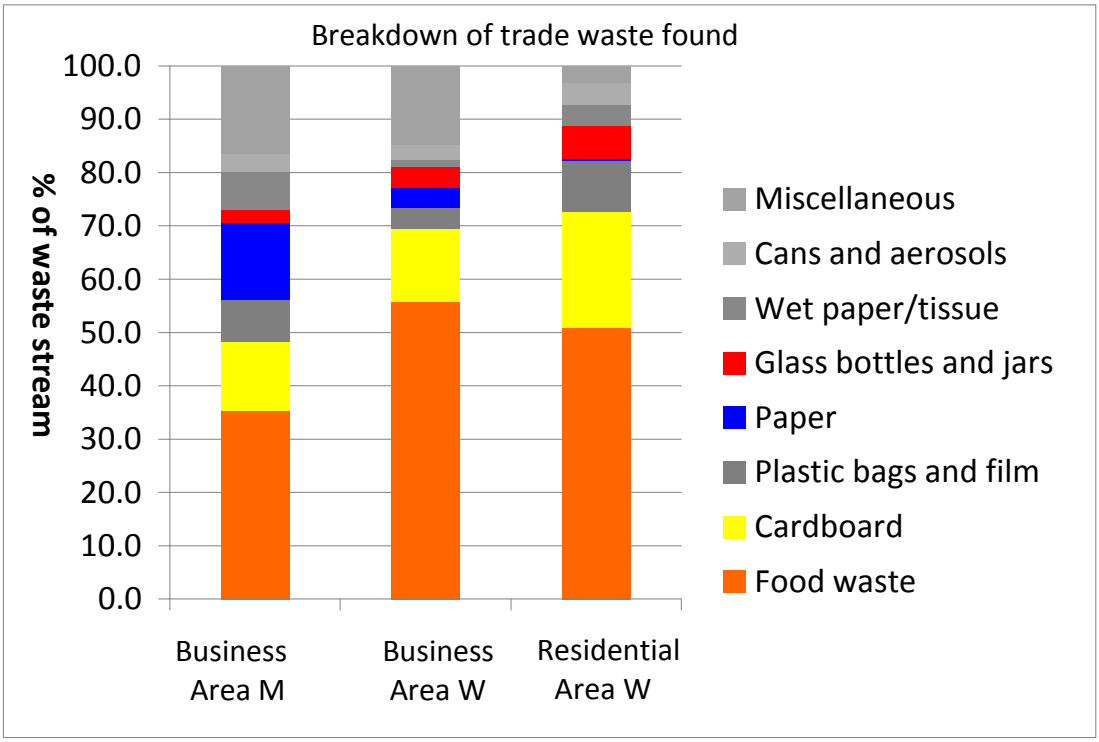
The results showed that:

- Between 6% and 10% waste found to be from a commercial source where bins were in an area with commercial outlets.
- 27% of household waste could be recycled in the kerbside scheme. Waste analysis of wheelie bins and black sacks in 2007 indicated similar percentages of recyclables in residual waste.
- 20.9% of the household waste was food.
- Between 30% and 50% of commercial waste was food predominantly from fast food outlets.
- More than 80% of commercial samples could be recovered or recycled




Composition of household waste found
% of waste stream
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
Business Area M
Business Area W
Residential Area M
Residential Area W
Other
Food waste
Recyclable in k/s


Breakdown of recyclables found
% of waste stream
40.0
30.0
20.0
10.0
0.0
Business Area M
Business Area W
Residential Area M
Residential Area W
Plastic bottles
Paper
Glass bottles and jars
Cardboard
Cans and aerosols



Note: Business Area refers to communal bins in a street with a lot of businesses as well as residential properties. Residential Area refers to communal bins in a street with mainly residential properties and little of no businesses. M- Monday W – Wednesday.

All the composition data helps inform what materials should be targeted for recycling collections to improve recycling rates.

Overall food waste makes up the biggest portion of waste which is still in the residual waste stream and will need to be collected separately if recycling rates are to improve significantly. A business case for a food waste collection service is being developed.

Benchmarking & Best Practice (Household Waste)

Performance of recycling services varies widely across the country. Generally rural areas with lower housing density have the highest rates of recycling and composting.

In urban areas higher housing density, lack of storage space and higher rates of population turnover make it more difficult to achieve the recycling rates achieved in some rural areas.

WRAP have released a report (Analysis of kerbside dry recycling performance 2008/9) which seeks to identify some of the main factors affecting the effectiveness of recycling collection schemes. The report found that the main factors affecting recycling performance are:

- **Socio-economic**, with lower yields associated with areas with higher levels of deprivation;

- **Range of materials targeted**, with those local authorities targeting a wider range of materials for dry recycling achieving higher kerbside dry recycling yields;
- **Kerbside collection system characteristics**, with those areas with less containment volume/ less frequent refuse collection for residual waste and greater capacity for dry recycling at the kerbside achieving higher dry recycling yields at the kerbside; and
- **Regional**, with some regional variations in kerbside recycling performance that cannot be explained by the other factors.

Of these the most influential were levels of deprivation (higher levels leading to lower recycling); the range of materials targeted (more materials leading to higher yields of recycling) and fortnightly refuse collections (leading to higher yields of recycling).

More detailed analysis is being carried out to assess how recycling rates vary across different parts of Brighton & Hove to be able to target areas of poor performance.

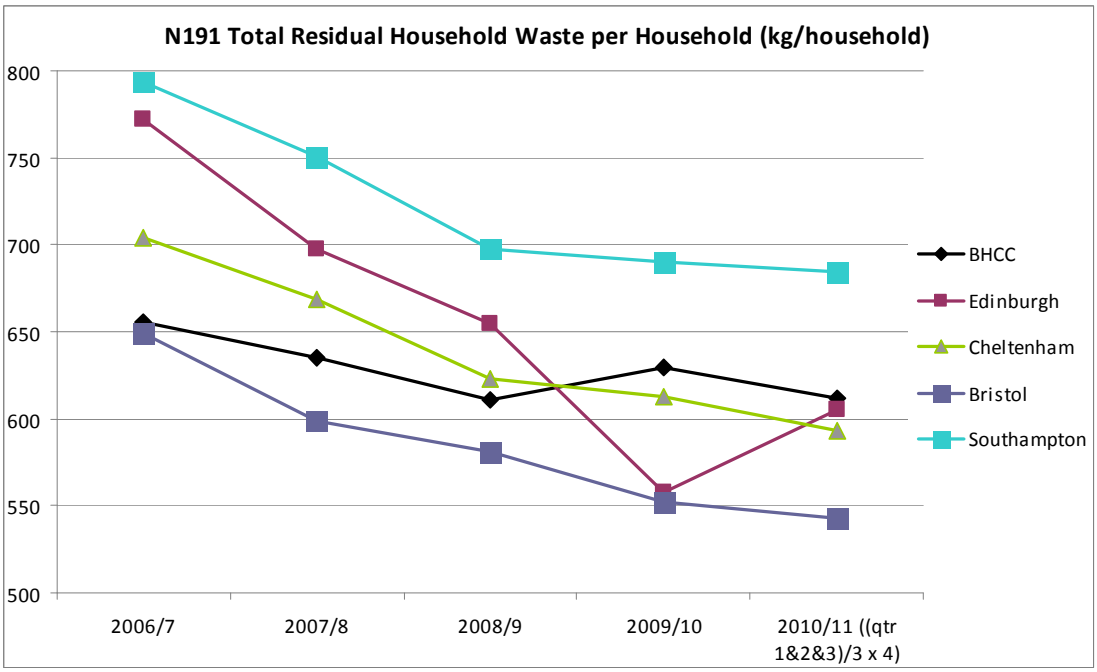
Best practice in relation to waste management is very different depending on local circumstances, for example housing density.

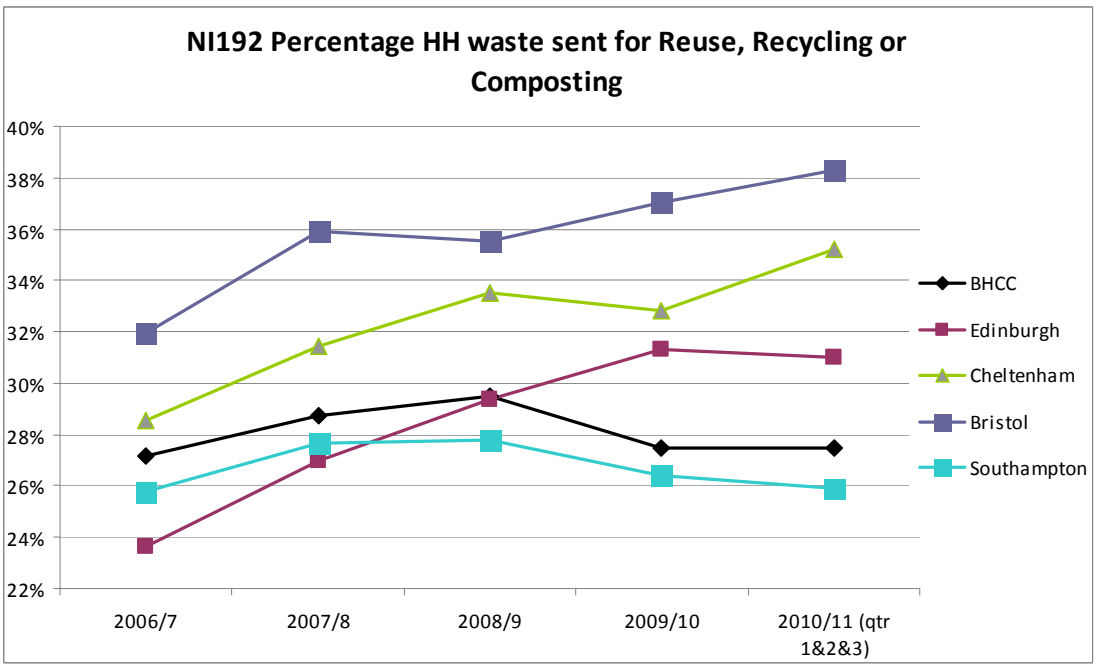
To assess performance in Brighton & Hove it has been benchmarked against comparable cities.

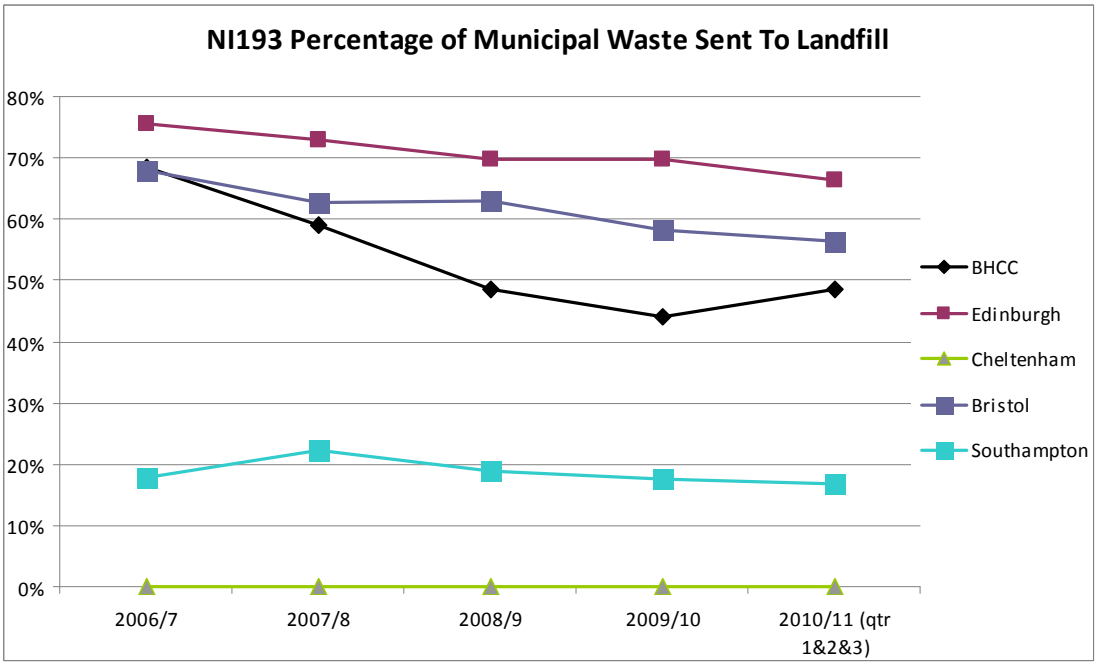
The Office of National Statistics shows Edinburgh, Cheltenham and Bristol as being most similar based on key population characteristics. In addition Southampton has been benchmarked. The services they provide and their performance is summarised below.

Authority	Kerbside Service Offered:	Additional Information:
Edinburgh City Council	Refuse: weekly Recycling: weekly (usually the same day as refuse) - Paper - Cardboard - Tins and cans - Glass - Cardboard drinks cartons - Plastic bottles - Textiles - Household batteries Green: From December to March collected every four weeks and from April to November every two weeks. Some city centre areas have daily refuse collections and communal recycling	Target; 75% recycling by 2020. Box covers and replacement recycling bags can be obtained from local libraries or the local neighbourhood office. Email & Text Reminders for Recycling Collections via www.greenboxday.co.uk. In April 2011 20,000 households will took part in a food waste collection trial.
Cheltenham	Refuse: weekly	From February 2011, the

Borough Council	Recycling: fortnightly - Paper - Cardboard (lightweight) - Tins and cans - Glass - Plastic bottles Green: fortnightly, charged for.	kerbside garden waste service (which was free of charge to 41,000 residents using re-useable bags) was replaced with a wheeled bin service. This new service is available to all residents within the borough at a cost of £3 per month, payable annually in advance. If you opt to join the scheme you are issued with a 240 litre brown wheeled bin, which is collected on a fortnightly basis. From April 2011 introduced a weekly food waste collection service, and collecting refuse and recycling on alternate weeks.
Bristol City Council	Refuse: weekly Recycling: weekly (same day as refuse) - Paper - Tins and cans - Glass - Plastic bottles - Textiles and shoes - Foil - Aerosols - Household batteries - Spectacles - Engine oil (in a secure container) - Car batteries Green: weekly (same day as refuse), charged for. Food and cardboard: weekly (same day as refuse). Collected together - including from mini recycling centres at flats.	In April 2010 mixed plastic recycling trial started. Collection day finder on website. New waste contract due to start 2011. Local schools offered free waste and recycling education workshops.
Southampton City Council	Refuse: weekly Recycling: fortnightly (households), weekly (flats) - Paper - Cardboard - Tins and cans - Plastic bottles - Aerosols Green: fortnightly, free.	Offer a commercial waste service. No glass from kerbside.


N191 Total Residual Household Waste per Household (kg/household)
800
750
700
650
600
550
500
2006/7
2007/8
2008/9
2009/10
2010/11 ((qtr 1&2&3)/3 x 4)
BHCC
Edinburgh
Cheltenham
Bristol
Southampton


NI192 Percentage HH waste sent for Reuse, Recycling or Composting
40%
38%
36%
34%
32%
30%
28%
26%
24%
22%
2006/7
2007/8
2008/9
2009/10
2010/11 (qtr 1&2&3)
BHCC
Edinburgh
Cheltenham
Bristol
Southampton



No data is available for Cheltenham.

The table below shows the approximate breakdown of green and dry recycling in NI 192.

% of waste recycled and composted amongs benchmark grouping

		BHCC	Edinburgh	Cheltenham	Bristol	Southampton
2006/7	Dry Recycling	23.8%	14.3%	16.7%	21.5%	17.9%
	Composting	3.4%	9.3%	11.8%	10.5%	7.8%
2007/8	Dry Recycling	25.2%	16.5%	19.3%	21.5%	19.7%
	Composting	3.6%	10.4%	12.2%	14.4%	8.0%
2008/9	Dry Recycling	25.7%	17.0%	19.7%	20.5%	19.2%
	Composting	3.8%	12.3%	13.8%	15.0%	8.6%
2009/10	Dry Recycling	23.8%	19.1%	18.9%	22.4%	16.9%
	Composting	3.6%	12.2%	13.9%	14.7%	9.5%

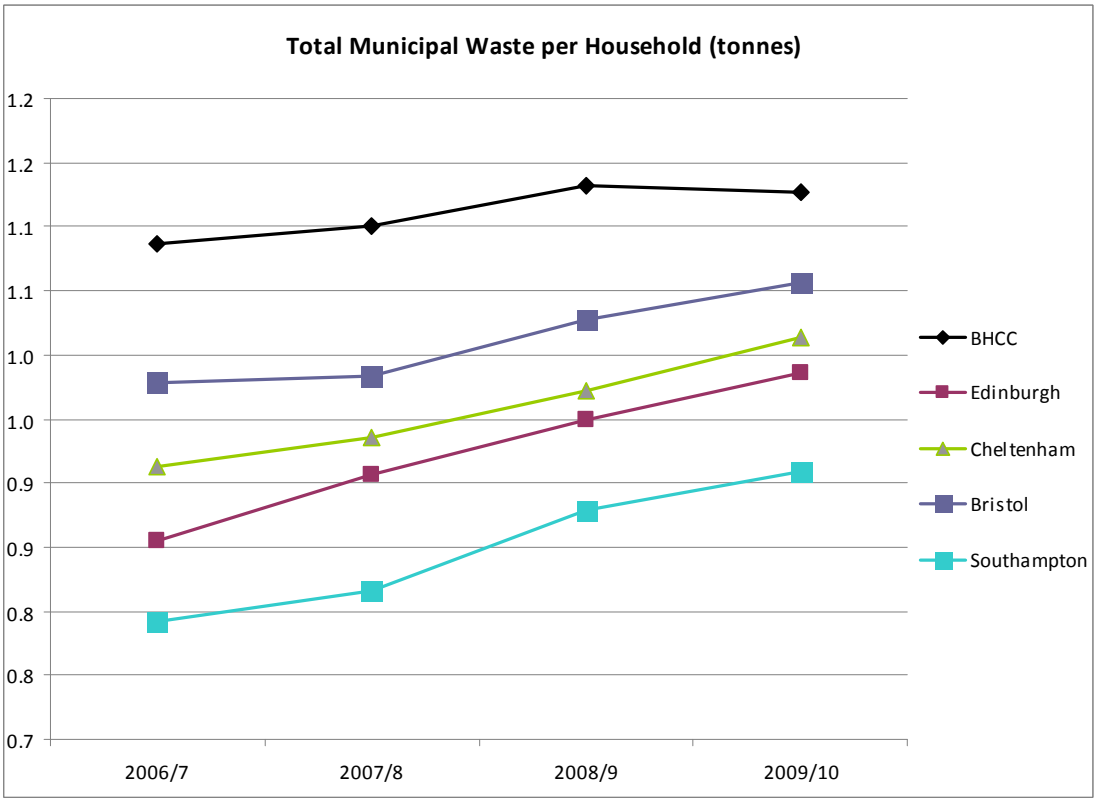
The benchmarking shows:

- BHCC's residual waste (waste that is not reused, recycled or composted) per household is near average for the group and is

generally declining. Cheltenham has the lowest residual waste per household. Its services are similar to BHCC's in all areas apart from the communal bin area but it provides a chargeable green waste collection service. As a result it has a higher composting rate, but its overall waste arisings are average.

- BHCC's percentage of waste sent for recycling and composting is at the lower end of the scale. The table above shows that in terms of dry recycling BHCC is the best performer, but the other authorities all have higher composting rates as a result of garden waste collections and in some cases food waste collections. Bristol has the highest composting and recycling rate and provides both a garden waste collection service and a food waste collection service.

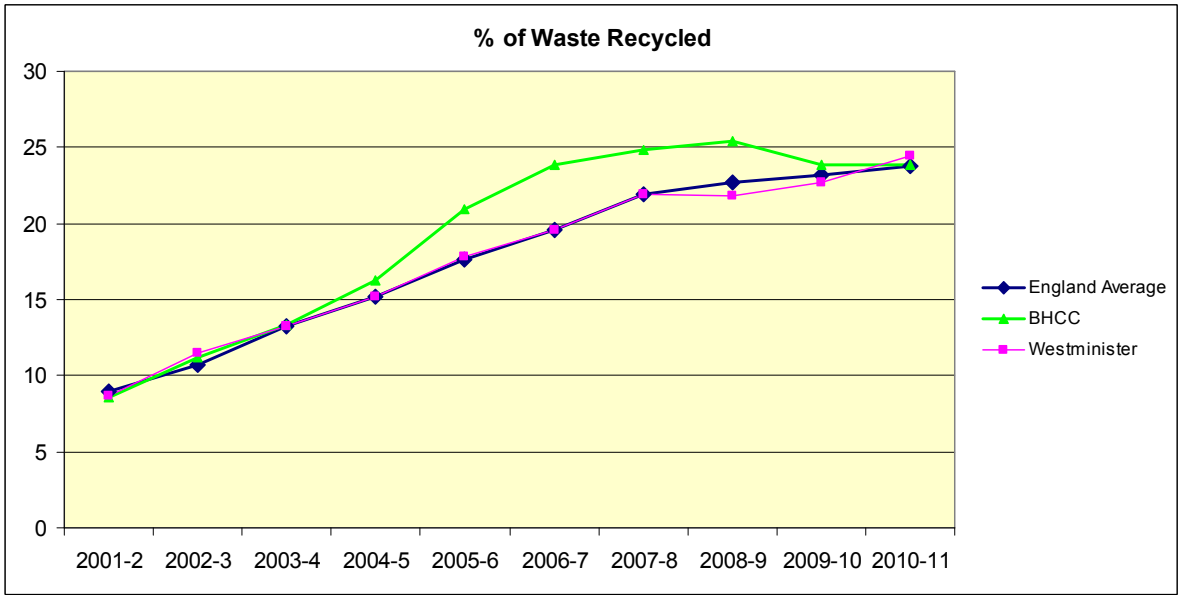
- BHCC's total waste per household appears to be the highest for the group. This is unexpected as generally authorities with garden waste collections have higher total waste arisings. It is unlikely to be due to household size skewing the figures as Brighton has relatively small households. Another possible reason is abuse of the domestic waste service by businesses. However while analysis of communal bins has shown some businesses do use communal bins the scale of the abuse is does not explain the difference in performance. It may simply be due to the fact that households in Brighton are more wasteful. This data requires further analysis.

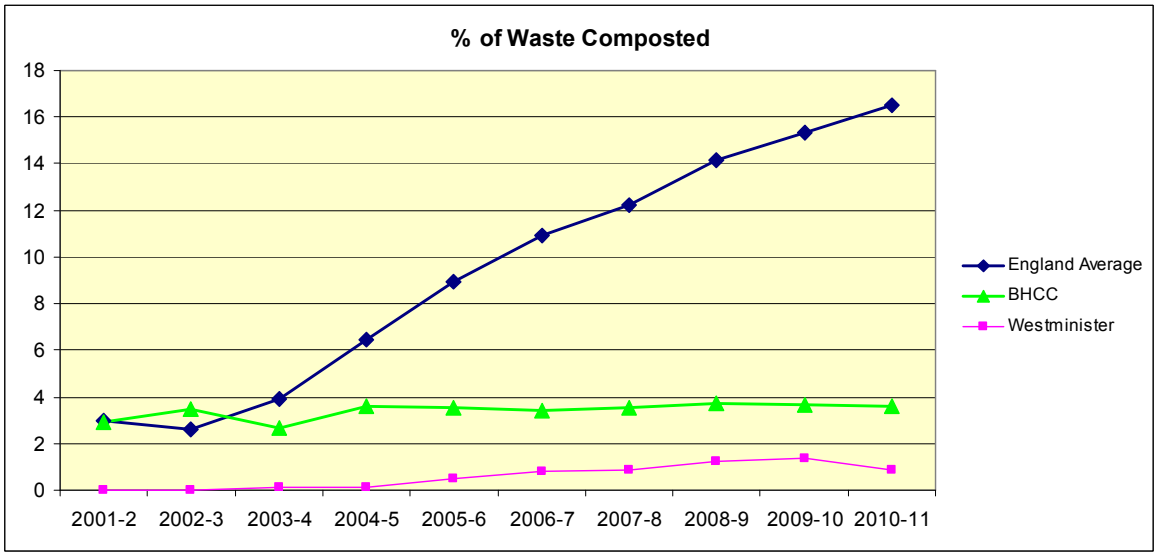


Nationally Brighton & Hove ranked 342 out of 379 with its combined recycling and composting rate of 27.7% which means it is in the bottom 10% overall.

While this includes rural authorities who generally have higher recycling and composting rates, BHCC ranked 13th out of 16 comparable urban authorities. It is therefore clear that there is scope to increase recycling rates.

In terms of dry recycling rates only BHCC is close to the average for unitary authorities in the UK and the difference in performance is largely down to lower composting rates as shown in the two graphs below.





Food Waste

Food waste makes up approximately a third of household waste, and it is estimated that each household spends £520 each year on food that is wasted.

In order to make significant improvements in recycling food will have to be collected separately. Extensive research has been carried out to determine how a food waste collection service could best work in BHCC. This research is available on line. Proposals for a food waste trial are set out in the action plan.

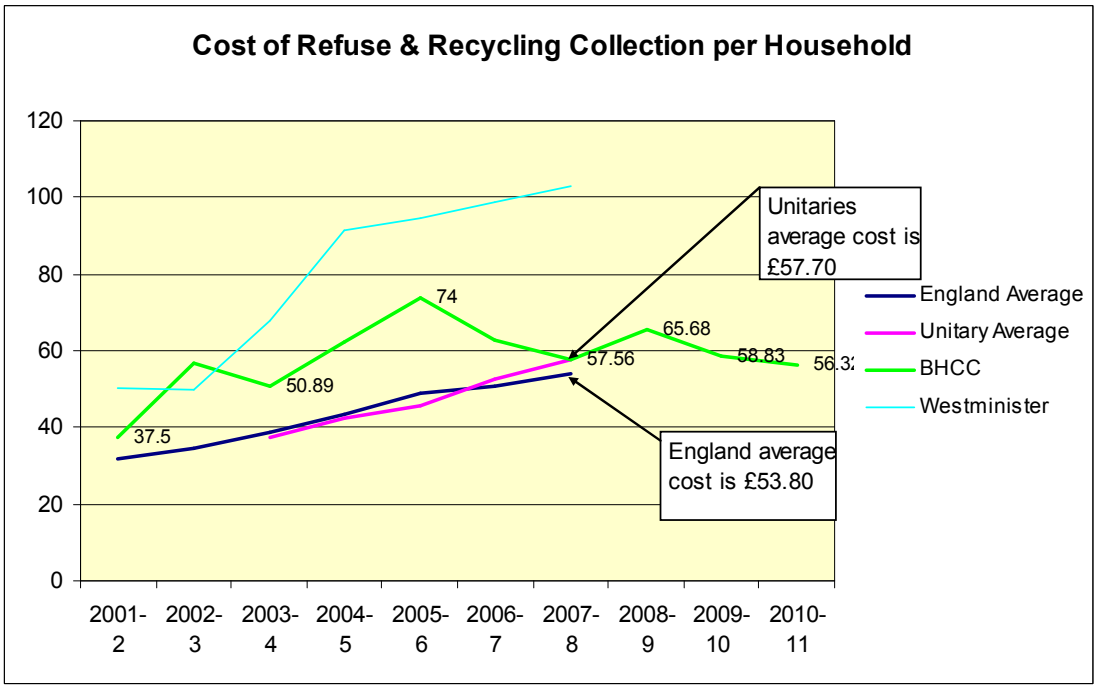
Waste Collection Costs

Cityclean employs 350 to 400 staff with more people being employed in the summer particularly on beach cleansing.

The annual budget is broken down as follows:

Refuse Collection	£2.9 million
Recycling Collection	£2.9 million
Street Cleansing	£6.1 million
Waste disposal/ recycling	£11.2 million
Total	**£23.1 million**

The efficiency of the collection service and street cleansing service has improved markedly since 2003. Waste collection costs over time are shown in the figure below. The overall decline in collection costs has been realised while at the same time rolling out a comprehensive kerbside recycling service. 2007/08 is the last year for which benchmarking data on costs is available.



Waste Disposal Costs

In 2003 the council, together with East Sussex County Council entered in to a 25 year PFI contract with Veolia to develop the required infrastructure to

handle both council's wastes in a sustainable manner. The value of the contract is approximately a billion pounds and includes:

- The construction of a new waste transfer station and recycling facility in Hollingdean, which was completed in 2009.
- The construction of a new energy recovery facility for residual waste in Newhaven which is due to be completed in 2011.

Under the contract Veolia are responsible for the composting, recycling, reuse, energy recovery and disposal of waste collected by the councils.

The costs associated with the treatment or disposal of a tonne of waste is summarised in the table below. It shows the clear financial incentive to reduce waste and to maximise recycling and composting.

Projected Waste Treatment Costs - Costs of treatment options in comparison to recycling

	Net cost difference/ tonne (£)			
Treatment option	**2011/12**	**2015/16**	**2020/21**	**2025/26**
Recycling	£	£	£	£
Composting	£ 23	£ 26	£ 30	£ 33
Energy recovery	£ 39	£ 43	£ 48	£ 53
Landfill disposal	£ 61	£ 94	£ 107	£ 108

* These costs differences are variable depending on factors including income from recyclate, electricity and on inflation.

Based on current costs reducing the total amount of waste produced by 1% will result in a saving of £110k per annum, every tonne reduction saves £101

Waste Projections

In order to forecast waste tonnages going forward and to plan for how they will be managed BHCC have developed a Waste Forecasting Model (WFM). The WFM is driven by a growth in household numbers and then other variables can be built in to model different outcomes.

The table below shows the No Change Scenario' which assumes things remain constant in terms of how waste is handled and the amount being recycled. It shows landfill decreasing due to the new energy from waste facility in Newhaven coming on stream in 2011 and waste growth is due to the number of households increasing. The amount of waste produced per household is assumed to remain static.

Changes need to be critically assessed on the basis that they do not increase overall waste levels or have a detrimental environmental impact. Disposal as well as collection costs need to be considered carefully.

No Change Scenario	2010/11	2015/16	2020/21	2025/26	2030/31
Landfill	45%	4%	6%	7%	8%
Energy from Waste	26%	67%	65%	64%	63%
Dry Recycling	24%	24%	24%	24%	24%
Green Composting	3%	3%	3%	3%	3%
Reuse	1%	1%	1%	1%	1%
Total Municipal Waste	100%	100%	100%	100%	100%

Future Targets

The existing strategy sets household waste recycling and composting targets for 2015/16 and 2020/21 of 40% and 45% respectively. Achieving these targets requires changes to existing services, in particular food waste collection and fortnightly refuse collection. The London Borough of Bromley has exceeded 50% recycling through this type of collection service.

The new Administration has set outs its ambitions to increase recycling rates and the OPL Framework sets a target of 70% recycling and composting of household waste by 2025.

Based on evidence from other authorities and the research done as part of this review the types of changes that would be required to achieve 50% recycling have been clearly identified. However the current economic climate and the budget constraints on the council mean that it will take some time to implement the changes to achieve this higher recycling/ composting rate. The proposed targets set out below reflect these constraints.

Achieving the OPL target f 70% recycling by 2025 will require further changes to packaging, the waste management industry and consumer behaviour.

The proposed targets for the revised strategy are set out in the table below. They assume a 10% reduction in the amount of waste produced per household between now and 2025.

Target	2008/09 Actual	2010/11 Actual	2012/13 Target	2015/16 Target	2020/21 Target	2025/26 Target
Recycling & Composting	29.2%	27.7	32%	40%	50%	70%
Energy Recovery	21.39%	26.8	56.1%	55%	48%	28%
Landfill	49.39%	45.6	11.6%	5%	2%	2%
Kg household waste per household	610	602	602	590	571	542
Kg residual	433	434	409	354	286	163

waste per person						

Commercial & Industrial Waste

Most businesses in Brighton and Hove are SMEs (small and medium enterprises), with a large proportion being micro businesses. Each business has to make its own waste disposal arrangements with private contractors.

A range of companies offer waste services from large multi-nationals to smaller enterprises. The amount of waste generated and the frequency of collections needed greatly depend on the size and type of business. Pre-paid bags are used by some businesses and larger wheeled containers by others. Collections are generally offered up to 7 days per week at different times of the day.

More than 20 different companies are being used in the city by 70% of businesses interviewed and only a small percentage of businesses use the same for waste and recycling (17%).[2]

Some contractors have their own waste disposal or processing facilities, other take it to a third party for processing or disposal.

The number of waste disposal or treatment facilities is limited and local landfill sites have very limited capacity left. This results in waste being transported across regions which carries a heavy environmental impact and has implications on the sustainability of the service.

Independent research in the city has shown that some businesses lack knowledge about managing their waste and have shown some dissatisfaction with their contracted collections.

The table below summarises the differences between household and commercial waste collections.

[2] Briefing note: Results from surveys in Brighton and Hove City. University of Brighton 2010.

Overview of Household and Commercial and Industrial Waste Services in Brighton & Hove

Waste Type	Household Waste	Commercial & Industrial Waste
Service Provider	The Council has a statutory duty to collect waste and recycling from all households. The services have been provided in house since 2003 and have developed and improved significantly since then.	Businesses are responsible for making their own arrangements to dispose of waste. There are approximately 20 different contractors offering waste services to businesses in the city. These range from small local companies to large multinational companies. Some of the companies only collect waste and transfer it to a third party waste disposal company, others provide both waste collection and disposal services.
Customers	Refuse and recycling services provided to 125,019 households, the total number of customer transactions is in the order of 200,000 a week taking in to account both refuse and recycling services.	All businesses in the city produce waste and all are required to make arrangements for the collection and disposal of their waste. There are around 13,000 businesses in the city, with a large proportion being small and micro businesses employing less than 10 people.
Funding of Service	The service is funded by the tax payer, but is free at the point of use.	Services have to be paid for by the businesses.
Description of services	Services have now been designed to contain waste to best suit different areas of the city.	A range of different services are offered depending on the type of business and volume of waste generated. Waste is either collected in bins or pre paid bags.
Refuse	**Weekly wheelie bin** collections are provided from the majority of households outside of the city centre. Relatively small 140l wheelie bins are used to minimise waste and encourage recycling. **Communal refuse collection** (6 times weekly) is provided to approximately 30,000 households in the city centre. Communal bins replaced black sack	Some businesses receive daily refuse collection, others less frequent depending on how much waste they produce and their contract. Waste is either collected in prepaid sacks or bins of varying sizes. The management of commercial and industrial waste can have a significant impact on the local environment and the economy, particularly in the city centre where there is the

	collections to improve street cleanliness and the efficiency of the service. **Bin store collections from blocks of flats**. Approximately 24,000 properties are in blocks of flats with dedicated bin stores. These are emptied with varying frequency depending on the storage capacity.	highest density of businesses. Overflowing or smelly bins, ripped trade waste sacks all adversely affect the city. Due to the large number of contractors operating in the city the quality of service is variable and numerous vehicles travel down the same streets collecting waste from adjacent businesses.
Recycling	**Kerbside collection** (fortnightly or weekly) of paper, card, glass, batteries, cans, aerosols and plastic bottles is provided to all suitable households. Weekly collections are provided in the city centre where households generally have less room to store recycling. **Blocks of flats** (over 15 properties per block) generally have dedicated recycling bins for paper, card, cans, aerosols, glass and plastic bottles. **Recycling points** consist of 'bring banks' where the public can take their recycling. Materials collected include textiles, tetrapak and others as well as those collected on the kerbside. **Recycling Centres** consisting of two household recycling sites for the disposal of waste and recycling; one in Brighton and one in Hove. More than 20 different materials can be segregated and recycled at each site with both achieving over 50% recycling and 70% landfill avoidance.	Data is limited, however a recent survey of 100 SMEs in the city showed: • 84% of businesses claimed to recycle. Out of these businesses paper and card is the most popular material recycled (68%), then plastics (31%), glass (25%) and finally cans (20%). • 70% of business had contracts in place for waste and half (50%) for recycling. Only 17% of these businesses used the same contractor for both waste and recycling. • Businesses stated the main barriers to recycling are cost (34%), lack of suitable services (25%) and lack of space (25%). • A significant number of businesses said they used the household waste stream for their waste. 14% use public bins and 13% take it home. 24% said they sake recycling to Recycling Centre's and recycling points. 13 % take recycling home.

		A significant amount of recyclable waste is being thrown away (see Waste Composition below).
Waste composition	Both household and commercial and industrial wastes have very similar compositions. Detailed household waste analysis was carried out in 2007, which is summarised below.	Overall commercial and industrial waste is similar in composition to household waste but it is often easier to separate and recycle because businesses tend to produce large volumes of certain materials. For example restaurants will produce a lot of food waste, offices a lot of paper and retailers a lot of packaging. The Council, in partnership with East Sussex, and Brighton University has carried out analysis of the composition of commercial and industrial waste in the city. Of 62 businesses sampled, the key findings showed that overall 31% of residual waste sampled was widely recyclable. This included: • Corrugated cardboard 50% • Office paper 11% A further 6% was possibly recyclable, where facilities exist, for example, plastic film and dense plastics. Business type had a big influence on composition and levels of waste. The most frequent materials set out were plastic film (produced by 89% of businesses), mixed paper (87%) and food waste (74%). Quantity varies across the businesses and food waste varied

		significantly. For example, out of the total sample (552kg), two businesses generated 19% of all the food waste found. Food outlets obviously generate the most food waste. In total 29% of the waste was organic and capable of being composted or treated via anaerobic digestion. The total fraction of the waste stream which could potentially be recovered for recycling or composting was 66%.
Tonnage of waste	The council collects approximately 110,000 tonnes of waste per year, of which approximately 28% is recycled.	It is estimated that 450,000 to 500,000 tonnes per annum is generated by the C&I sector across Brighton and Hove and East Sussex.
Waste Disposal & Processing	The council has entered a joint waste management contract with East Sussex County Council. The PFI contract was awarded to Veolia Environmental Services to build the necessary waste management infrastructure including recycling and composting facilities and an energy recovery facility.	The private sector uses a range of facilities for the disposal and processing of collected waste.

In summary, a lot of information is available regarding household waste collection and disposal. Significant improvements have been made to the service and the city has secured suitable infrastructure for the long term sustainable management of its waste. A lot less information is available about the management of C&I waste

Section 3 - Waste Development Framework & Waste Infrastructure

The Council is working with East Sussex County Council to prepare a Waste (and minerals) Development Framework. The main planning document in the Framework will be the Waste (and minerals) Core Strategy.

The planning system is important in helping to provide sufficient opportunities for new waste management facilities of the right type, in the right place, at the right time, and in ways which protect the environment and human health. The Core Strategy will set out how this should happen in East Sussex and Brighton & Hove.

Although the council is not responsible for handling all types of waste, as a 'waste planning authority' the council must set out a planning framework for managing all types of waste, not just municipal. For example it must also consider hazardous waste and construction waste.

The Core Strategy is currently in draft form and has been informed by several stages of public consultation. It is anticipated that a final version will be submitted to Government for inspection in 2012.

Waste Infrastructure – Household Waste

The council and East Sussex County Council have a Joint Municipal Waste Management Contract. This PFI contract, which was awarded in 2003 was awarded to Veolia Environmental Services.

Under the contract Veolia are responsible for delivering key infrastructure for the management of both council's household waste. The infrastructure consists of:

- An Energy Recovery Facility (ERF) constructed in Newhaven. This facility, which will start operating in 2011 has the capacity to process 210,000 tonnes of residual waste. It will generate electricity for approximately 20,000 households.
- A Materials Recovery Facility (MRF) constructed in Hollingdean, Brighton. The facility was completed in 2008 and sorts and bulks recycling collected from households. It has a capacity of 50,000 tonnes (if permission for extended working hours was obtained), but currently processes approximately 30,000 tonnes per annum.
- A composting facility at Whitesmith, East Sussex. The facility will be able to process 46,000 tonnes of waste (of which 15,000 tonnes can technically be used for food waste, but currently planning permission is limited to 1,000 tonnes per annum).
- A number of Waste Transfer Stations (WTSs). A purpose built WTS for Brighton & Hove was completed in 2008. Refuse trucks tip their waste here prior to it being bulked up for disposal at Newhaven.

- 14 Household Waste Recycling Sites (HWRS's), two of which are located in Brighton & Hove. Residents can take their waste and recycling to these sites. The sites are very well used, with up to 25,000 per month per site.

Waste Infrastructure – Non Household Waste

The quality of data on C&I waste is limited because data reporting and data collation arrangements are much less strict than they are for municipal waste.

Furthermore because C&I waste is managed by private waste management companies there are issues about commercial confidentiality and also about consistency of the data that is collected.

The council does not control the way in which C&I waste is managed. Because the management of C&I waste is largely a commercial concern then the choice of how it is managed is likely to be more dependent on cost and convenience than geographical location or environmental impacts. This means there is likely to be more cross-boundary movements (to other local authority areas) of waste than there is for household waste.

It is estimated that there will be a shortage of facilities to handle C&I waste over the next 15-20 years. Landfill in East Sussex (at Pebsham) is due to run out in the next few years so C&I waste will need to be managed at alternative facilities, potentially outside of East Sussex or Brighton & Hove although the closest landfills in West Sussex (Lidsey and Horton) have also got very limited capacity.

The development of new infrastructure for waste processing, recycling and composting requires the waste industry to invest significant amounts of money to construct the facilities. Risks to investors can be high, depending on the technology and limited security of contracts.

Financial pressures also result in a tendency for industry to develop larger, more centralised, facilities for handling C&I waste so that they can achieve the economies of scale by serving a much wider area.

Section 4 - Future Service Provision and Needs Assessment

Introduction

This section sets out:

- What changes to services are needed to ensure they are compliant, efficient, sustainable, and represent best practice and meet the needs of the service users.
- What further research and analysis is needed to inform future development of waste services in the city.

High Level Needs Assessment/ Gap Analysis & Information Requirements

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
1	**LEGISLATION & POLICY**	The Government has recently reviewed the national waste policy and consulted on a key number of pieces of legislation which may have a significant impact on waste and recycling.			
1.1	***EU framework directive - 50% household waste recycling by 2020****.* Localism Bill giving powers to pass EU fines down to local authorities for failure to meet national targets.	The EU framework directive requires member states to recycle 50% of household waste by 2020. In the UK individual local authorities have not been set recycling targets, however Part 2 of the proposed Localism Bill gives ministers power to pass EU fines down to local authorities if they are deemed to not have done enough to increase their recycling rate. The legislation	Cities generally have lower recycling rates than other authorities and therefore it would be reasonable to not expect BHCC to require the achievement of 50% recycling. However BHCC could do more to increase recycling rates, particularly through the introduction of food waste collection, although this would have implications in terms of cost and service delivery.	***Add more dry recyclables to the collection service and bring sites*** Materials which could be added in future are mixed plastics, foil, and tetrapak. Introducing all these materials is estimated to increase the recycling rate by approximately 3%. The impact of additional tonnage needs to be considered against potential reduction in quality of other materials (e.g. collecting food containers can affect paper quality & value) and cost. ***Increase participation*** If everyone recycled all their	Opportunities to add mixed plastics, tetrapak and foil to collection services are being investigated with Veolia. These are being considered in terms of cost, environmental benefit and the impact on the quality of the rest of the recycling stream. Commercial incentive schemes have been

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
		surrounding this is still uncertain as is its implementation – local authorities could be fined for not recycling enough even though they have no target to work towards. The definition of 'recycling enough' is very vague and it makes it difficult for local authorities to prioritise resources as the risk of fines is not known. The level of potential penalties is not yet known.		paper, card, plastic bottles, cans and glass (for which we currently provide collection services), the recycling rate would go up to approximately 37% - an increase of approximately 9%. Potential ways of increasing participation include: • Collecting refuse fortnightly • Providing incentives for recycling/ penalties for not recycling • Making the recycling service easier to access (e.g. communal recycling in the city centre). ***Introduce garden waste collections*** Garden waste collections increase recycling rates but can also increase total tonnage collected by diverting waste from home composting. Garden	explored but have not been taken further at this stage because of the high revenue cost to the council and no guarantee of being able to cover the investment through reduced disposal costs. The impacts of fortnightly refuse collection have been explored as part of research on feasibility of food waste collections. Communal recycling is being trialled in the city centre to try and increase participation rates in this area. Research has already been carried out on chargeable garden waste collections and such a service would not be self funding.

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
				waste collections are therefore not considered to be environmentally or financially sustainable. ***Introduce food waste collections*** Food waste makes up about 30% of the total waste thrown away in Brighton & Hove. Issues to consider are that a food waste service is likely to have significant capital and revenue cost implications. Savings as a result of diverting food waste to composting are unlikely to cover the cost of the scheme. The type of collection service would have to be designed for the different areas of the city (the service in the communal bin area would be very different to that in the wheelie bin areas). Refuse collection would have to move to fortnightly in wheelie	Mobile technology business case being progressed Research in to best practice on food waste collections is being carried out and a feasibility study/business case is being prepared for consideration. Mobile technology business case being progressed

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
				bin areas in order to help fund the food waste collection service and increase participation rates.	
1.2	***Potential ban on landfilling household waste:*** Paper Food Garden Waste Dry recyclables	A government consultation on potential bans is currently taking place. If bans are imposed this is likely to be phased in over a time period of at least 7 – 10 years.	Between 2015 and 2030 BHCC is expected to landfill between 2,000 and 9,000 tonnes per annum. The implications are not known as it depends on if bans are introduced, what materials they apply to, what form they will take and what, if any, sanctions there will be for non compliance. However given the very limited tonnage sent to landfill BHCC is expected to be in a relatively good position.	***Same as 1.1 above***	See above
1.3	***Potential ban on landfilling C&I waste:*** Paper Food Garden Waste Dry recyclables	**See 1.2 above**	A significant amount of C&I waste is still disposed of with residual waste and landfilled. Therefore a ban would be of greater significance for C&I waste. A transformation of collection and disposal	With the expected abolition of LATS there may be a business case for the council to carry out C&I waste collections. This would provide the opportunity to streamline household and business collections in the city, give businesses greater	A study is being undertaken to assess what capacity contract facilities have to process C&I waste. The business case for to assess the feasibility of

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
			services would be required, and it is likely that recycling infrastructure would have to be developed further which would require significant investment.	consistency and security and reduce the number of vehicles collecting waste and recycling. The ability to do this depends on how competitive the council could be compared to private sector contractors and its capacity to collect and process waste at its facilities.	collecting commercial residual waste and recycling is being developed. Mobile technology business case being progressed
1.4	***The council's waste strategy sets recycling and composting targets of 40% by 2015/16 and 45% by 2020/21*** ***The OPL framework has set a target of 70% household waste recycling for***	These longer term strategy targets are aspirational and can only be achieved by the introduction of additional services, in particular the collection of garden waste and/or food waste.	The targets are not statutory, but not improving recycling rates may have implications in relation to EU targets set out above. Introducing these services and achieving the targets needs to be considered against the cost of introducing them and the overall environmental impact. Feasibility of achieving 70% target needs to be assessed based on detailed waste	***Same as 1.1 above.*** Feasibility of achieving 70% recycling needs to be assessed, but to even attempt to reach a target of >50% all four actions listed below will need to be implemented: • Food waste collection • Fortnightly refuse collection • Communal recycling • Extend range of materials collected	

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
	2025		analysis/ development of service business plans.		
1.5	***Review of Controlled Waste Regulations*** Allowing local authorities to charge for collection and disposal of waste from schools and prisons.	Under the existing Controlled Waste Regulations certain institutions including schools and educational establishments, hospitals, prisons and charities can ask local authorities to collect and dispose of their waste, but the local authority can only charge for collection and not disposal. With the escalating cost of waste disposal this has put an increasing financial burden on local authorities and has removed the incentive from waste producers	BHCC does not collect waste from these establishments (except charities as mentioned), however there is a risk of being required to do so currently and this review is expected to eliminate this risk.	The council could consider providing a chargeable collection service for these organisations. The change in definition together with the abolition of LATs may mean that there is now a business case for the council to provide waste and recycling services to these types of organisations. (See below for detail).	A business case for the commercial refuse and recycling service is being assessed Mobile technology business case being progressed

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
		to minimise waste and recycle more. BHCC currently collects household type waste from charities in the city and does not charge for collection or disposal.			
1.6	***Abolishment of Landfill Allowance Trading Scheme (LATS) from 2012/13***	Under LATS local authorities faced fines of up to £150/tonne if they landfilled too much biodegradable waste. To avoid fines they could buy allowances from authorities which had 'spare' permits. The aim of the scheme was to ensure that the UK as a whole met its obligations to divert municipal waste from landfill.	Due to the rollout of recycling services and the development of waste infrastructure BHCC was in a good position in relation to LATs until at least 2020 and the financial risk was low. A council run commercial collection service is likely to be popular with many businesses. It is also a manifesto commitment from the new administration. A business case needs to be developed.	The abolition of LATS means that there may be a business case for the collection of C&I waste, particularly from SMEs in the city. Waste analysis has indicated that a proportion of C&I waste is currently illegally (knowingly or unknowingly) disposed of in the domestic waste stream. ***Bring the collection of schools waste in-house*** School waste collection was outsourced to reduce the risk of fines, but it may now be	Assess costs and feasibility in terms of impacts on collection rounds.

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
		This discouraged local authorities from providing waste collection services for businesses. LATS does not apply to private sector waste collection companies and therefore there was not a level playing field between the public sector and the private sector. The abolishment of LATs will make it easier for local authorities to compete with the private sector to provide waste and recycling services for businesses in the city.		beneficial to bring this in house. This will have the advantage of bringing schools recycling in line with the household service and can help promote recycling in the city. The existing contract comes to an end in March 2013. ***Collect C&I waste from businesses in the city*** This could reduce the number of collection vehicles in the city, reduce bins on the street and increase street cleanliness. It could improve services for many businesses.	Assess business case for C&I collection and feasibility in terms of collection and processing capacity. Mobile technology business case being progressed
2	**WASTE GROWTH**				
2.1	***Household waste growth***	Overall household waste has been	Through the PFI contract Brighton & Hove (and East	Reducing waste and increasing recycling (depending on how the	

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
	due to population growth or changes in consumer behaviour	reducing year on year from 110,632 in 2006/07 to 108,443 in 2009/10. Household waste is expected to grow by 3% by 2025, largely due to increases in the number of households. There are no national figures on projected waste growth although Defra is expected to publish figures in the near future.	Sussex) have sufficient infrastructure to cope with waste growth of The council has made provision in the management of its PFI reserve for waste growth. However any reduction in waste arising or increase in recycling will result in savings for the council.	service is provided) reduces costs to the council.	
2.2	***Growth in commercial and industrial waste due to growing economy/ changes in consumer behaviour***	Data on C&I waste is limited. The government is expected to release projections for C&I growth in the near future.	Growth in C&I waste could result in insufficient processing capacity in the region and opportunities for recycling being limited. Waste costs for the business sector would go up, and waste would end up being transported over	In the main the private sector provides its own infrastructure. The development of new infrastructure such as processing facilities and AD will be advantageous in increasing the range of outlets and companies operating these.	BHCC is working as part of the group of South East 7 (SE7) authorities. One of the objectives of the group is to map waste arisings and facilities on a regional level to inform what further facilities are needed and where this

	Issue	Background	Potential Implications / Risks for Brighton & Hove	Options & Opportunities	Work Being Undertaken or Planned
			longer distances. Potential risks include adverse impacts on the economy and increases in flytipping.		would be possible to encourage markets for recyclate.
2.3	***Insufficient processing capacity for C&I waste due to lack of investment / landfill closure***		If there is insufficient capacity to process C&I waste in the area, material will have to be transported further and costs for businesses will increase.	Existing contract facilities have additional capacity to process recycling and composting as well as energy recovery. The full potential of this capacity needs to be assessed.	Assessment of capacity in contract facilities Work with the private sector to develop infrastructure
3	**FINANCIAL**				
3.1	***Local authority budget constraints are set against rising costs of waste collection and treatment/ disposal***	The council has made provision in the management of its PFI reserve for waste growth.	Disposal and collection costs need to be considered together. Reductions in disposal costs may not off set increases in collection costs.		

Section 5 Conclusions & Action Plan

There are numerous drivers to further reduce total household waste arisings and increase the amount of waste recycled (and composted). In summary these are:

- National policy and legislation (although no specific targets have been set for local authorities and much of the legislation is still under review)
- The commitment of the Green administration to achieve 70% recycling and introduce a separate food waste collection service
- Targets in the existing waste management strategy
- Costs – costs of processing wastes generally follow the waste hierarchy, with recycling and composting being cheaper than recovery or disposal. There may however be exceptions to this, particularly when collection costs are taken in to account.

There is also increasingly a need to work more closely with the business sector to improve management of C&I waste and recycling. Drivers for this include:

- Desire from businesses to have better waste services and recycle more
- Legislation to increase recycling/ reduce waste sent to landfill
- A commitment from the Green administration to explore the options for providing a food waste collection service.

Addressing all these issues will require a significant transformation of services, for example:

- Food waste will require a whole new collection service and fleet and will impact on existing services
- Improving recycling in the city centre will require the implementation of communal recycling
- Commercial waste and recycling collections will require the necessary customer service and administrative processes, and different working practices.

The Action Plan below sets out the next stages of work to deliver the required transformation of the service.
It includes actions from the 2010 plan which have yet to be completed or are ongoing.

Waste Strategy Priorities Plan 2011 – 20??

Outcome	Action	Target
Policy 1: Service Quality and Engagement with Residents, Businesses and Communities		
Effective engagement with stakeholders in the development and delivery of the waste management strategy for the city	Maintain and bed in the role of the Waste Advisory Group (WAG) WAG to review the waste strategy and contribute to detailed implementation plans.	It is proposed to extend the remit of the WAG to look at other city wide issues eg the Waste & Minerals Development Plan and to advise the City Sustainability Partnership on the zero waste and sustainable material themes of OPL. It is intended for the membership of the WAG to broaden in 2012 in light of the above changes. This means that the terms of reference and governance for the group will need to be reviewed. Review proposals for communal recycling (Dec 2011), commercial waste collection (Mar 11) and food waste collection (Mar 11). To be funded from existing resources
An active community and voluntary sector working effectively with the council to deliver the waste strategy	Continue to support the Community Waste Forum (CWF) with a view to the group becoming firmly established in order to help deliver waste related projects in partnership with the council and where appropriate bid for funding for projects. Projects developed to date address – what does this mean?	The CWF is currently looking for new members to Deliver and continue to support priority projects identified which include community composting, incentives to recycle more, improved communications. It will also identify funding opportunities and submit partnership funding bids. It aims to establish a formal link with the city's

		Community & Voluntary Sector Forum (CVSF) via an environmental representative. This means that the terms of reference and governance for the group will need to be reviewed. Progress against targets will be reported through an annual report. The WAG has asked the CWF to develop relationships with the Youth Council, schools & colleges, explore the opportunity of training local volunteers or community champions to encourage more effective face to face communication and to publicise visits to the Hollingdean material recovery facility (MRF) on the CWF webpage. It has also asked for the council to follow up at schools taking part in the Wastebuster programme when recycling or reuse rates may have decreased subsequently. To be funded from existing resources
Further improve communication and responsiveness of the service.	Implement technology solution which enables direct communication between front line staff and the contact centre. This will result in improved service for the customer and improved efficiency	Implement technology solution by Aug 2012. Business case prepared / first stage of work (improving back office) being implemented as part of ICT strategy.

	Develop a clear and effective communication strategy focussing on key messages in relation to waste and other areas eg those in the OPL framework. Target messages at specific audiences eg target waste messages at areas with worst performance.. Assess different communication channels for effectiveness and cost	Agree communications strategy by March 2012, review annually. Strategy to be delivered within existing communications budgets
Improve reliability of refuse and recycling service	Vehicle replacement programme for which funding has been approved will lead to a more reliable fleet and improved reliability. Mobile technology as set out above will also improve service reliability.	Measure through customer satisfaction survey and service statistics. Reduce number of missed bins by 50%. Collect all missed bins within 24 hours of reporting Vehicle replacement program is funded/ mobile technology is subject to business case.

Publish performance data on website	Publish date relating to: • Recycling rates and other relevant waste statistics • Service reliability eg number of missed bins • Customer service performance eg how quickly we respond to complaints	Performance web page to be published by Dec 11 Funded from existing resources
Reduced problems associated with studentification in relation to refuse and recycling.	Continuation of work with both University of Brighton and University of Sussex and expanded practical work within university halls and private accommodation.	• Continued presence at university freshers fairs offering help and advice to new students. • Continuation of mass emails to all university students. • Additional practical work in student halls with residential advisors to recruit recycling champions in each block to monitor recycling participation, report on barriers and increase rates • Co-working with Environmental Health focusing on problem households in residential areas, aiming to educate them in terms of effective waste management and to help with any barriers or problems that may be present. • Plan to increase links to sixth form schools and colleges, possibly through the adult learning partnership. Action to improve and promote universal signage. Funded from existing resources
Policy 2 Waste Minimisation & Prevention		

Reduce amount of food waste produced by householders	Continue outreach work with Food Partnership and other partners to encourage residents to waste less food.	Foods partnership to continue food demos at large public spaces such as Churchill Square and Jubilee Square and supermarkets throughout the city. 18 demonstrations are planned from July 2011 to June 2012. Food demos include leftover cooking with community chef Olly Dawson, composting tips with a compost doctor and volunteers from the Food Partnership advising residents on the best approach to reduce their food waste and save money. This practical work will be promoted by corporate communications and via social media. Extension beyond July 2012 subject to funding
Prevent illegal disposal of waste (both household and business waste)	Effective enforcement action against illegal waste disposal, working with businesses where possible.	Reduction in number of incidents in waste out at the incorrect time/day and number of flytipping incidents. Funded from existing budgets
Policy 3 Increasing Rates of Re-use		
Increase re-use and recycling of textiles	Trial and assess feasibility of re-use charity consortium managing textile banks in the city. Implement changes to service to ensure benefit from textile collections is retained in Brighton and Hove.	Complete trial of textile bring bank scheme Feb 2011 Implement revised textile bring bank scheme June 2011 No cost
Work with local reuse groups through community waste forum	Further develop re-use plans for the city with community sector partners.	Re-use proposals to be published through the CWF

(CWF)	Raise profile of groups through council channels, Develop reuse events annually with universities targeting students at end/ start of term	Funded from existing budgets.
Open re-use facility at Brighton HWRS	Let contract to voluntary sector partner (through open competitive process) to operate re-use scheme at Brighton HWRS on completion of site redevelopment Appoint	On completion of site redevelopment Spring 2012 No cost
Increase re-use (and recycling) of bulky items	Contract documentation has been developed with WRAP (Waste and Resources Action Program) in order to maximise reuse and recycling and ensure there are no unreasonable barriers for the community and voluntary sector to bid for the contract.	New contract to be awarded by March 2012 No cost – self funding chargeable service
Policy 4 Increase Recycling Rates		
Trial communal recycling in Brunswick/ Adelaide Ward	Consultation on proposals by December 2011, Roll out trial in spring 2012 subject to outcome of consultation. Monitor satisfaction and recycling rates to assess effectiveness of changes	Trial to run for 12 months from March 2012 Trial funded – overall efficiency savings if rolled out on wider scale.
Pursue feasibility of increasing materials collected for recycling, in particular mixed plastics, foil and tetrapak	Feasibility of adding materials to recycling service kept under continuous review.	Determine feasibility (environmental and financial) of collecting more plastics, foil and tetrapak on the kerbside scheme by Dec 2011. Changes subject to costings & business case.

Increase recycling in worst performing areas	Targeted communication campaign encouraging people to recycle more and produce less waste, working in partnership with community and voluntary sector where appropriate.	Refer to communications under policy 1.
Increase recycling of electrical items, particularly in city centre	Introduce bring banks for waste electronic equipment recycling at 10 locations	Banks in place by Dec 11
	Provide information to households in time for digital television changeover scheduled for March 2012	Develop communication campaign in time for changeover
Policy 5 Increase Composting Rates		
Trial food waste collection service	Develop business case and detailed costings for trial (February 2012). Consult on proposals (Spring 2012) Roll out trial late 2012/early2013 – subject to consultation.	Trial to run for a period of 12 months. Decision on further roll out will depend on outcome of trial. Funding for trial sought. External sources of funding being pursued.
Increase usage of home composters and food waste digesters	Promotion of home composters and food digesters through various media: • Food Partnership events • On line, via Facebook and Twitter • Community events attended by Cityclean or community partners	Targets for sales of bins: 250 Food composters and wormeries sold 750 Garden Composters sold. Recent drop in sales could be attributed to saturation of garden composters from previous successful years of sales. Next year could have a lower due to further saturation. Funded from existing budgets
Policy 6 Waste From Businesses and Other Organisations		
Provision of refuse and recycling service for	Develop business case for commercial waste collection, particularly for small to medium sized	Launch commercial refuse/ recycling collections subject to business case in 2013

small businesses in the city	enterprises and starting with Business Improvement District (BID) Develop business case for commercial recycling collection, particularly for small to medium sized enterprises and starting with Business Improvement District (BID)	
Improve partnership working with business sector and the Business Improvement District (BID) in areas like waste collection, highways licensing, containment and street cleansing.	Meet with representatives to agree on what areas we can effectively work in partnership and how this arrangement will work.	Ongoing
Lead on joined up approach to management of all waste streams (household, commercial and industrial and construction waste) to ensure it is more sustainable	Work with South East 7 (SE7) group of authorities to identify infrastructure, material flows and business opportunities in relation to waste and recycling on a regional level	Project plans and business cases for priority materials complete by Spring 2012.

Food Waste Collection Research to Inform Brighton & Hove City Councils Proposals for a Food Waste Collection Trial

Introduction

Approximately a third of household waste is food waste and it is estimated that each household spends £520 each year on food that is wasted. The Council is investigating options to introduce a food waste collection service in Brighton and Hove. This desk based research has reviewed available information on food waste collections elsewhere in the country. The findings will be analysed further to help develop options for a food waste collection service.

Collections of food waste are now taking place across many authorities in England. According to WRAP, in 2011 136 authorities in England collected food waste, of these 71 collected food waste separately, whilst 65 collect food mixed with green waste. Three authorities have a mixture of these two collection types.

Options for collecting food waste

1. Collect food separately with bespoke vehicle
2. Collect food separately but at the same time as other wastes with a split bodied vehicle or a compartmentalised vehicle
3. Collect food and garden waste together in a single vehicle

WRAP Trials

Between 2007 and 2009 WRAP provided funding to 21 local authorities in England and Northern Ireland to carry out food waste collections. In all these trials food waste was collected:

- By small dedicated collection vehicles
- On a weekly basis
- In separate containers to both residual and garden waste
- With the provision of kerbside containers and kitchen caddies to residents
- With the provision of liners for either kitchen caddies or kerbside containers (excluding one small area in Surrey)

A summary of their main findings is below.

Housing Type	Residual Collections	Yields (kg/hh/wk)	Participation Rates (%)	Other comments
Low and Medium Density	Mix of weekly & fortnightly	1.5 – 2.17	58 - 74	Higher home composting due to larger gardens
High Density	Weekly except for in one area which had fortnightly.	1.07 – 1.68	44 - 73	A variety of systems were developed by local authorities to enable efficient loading in high-density housing areas often with double parked cars.
Multi-Occupancy	Weekly	0.46 – 0.53	25 - 30	Although door to door services produced

		(doorstep collection or a communal collection point) 0.29 (bring scheme with containers serving a high number of households)		higher yields they were time consuming and access proved difficult. The best solution to achieve reasonable yields whilst not being too time consuming was for communal bins to be located with the communal residual bins.

Scottish Food Waste Trials (WRAP and Zero Waste Scotland)
Funding was made available by the Scottish Government in 2007 for local authorities to trial food waste collections from households. Six food waste collection trials were conducted in Scotland between 2008 and 2009. Trials took place in Aberdeenshire, East Renfrewshire, Glasgow City, Inverclyde Council and Perth & Kinross.

Two of the trials provided a combined food and garden waste collection to main door properties. A summary of the results of the Scottish trials for non-flats is shown in the table below:

Collection method	Average set out rate	Average yield (kg/hh/wk)
Food waste only	45%	1.5
Co-mingled food and garden waste	34%	4.3 (0.8 food)

Unfortunately the capture rate associated with the Scottish food waste trials is not presented in the report, nor is the impact that the collection of food waste had on residual waste arisings.

Key factors affecting yield of food waste collected

- **Residual waste collection frequency** - With weekly residual waste collections a decrease in participation and yields of food waste were experienced over time in the WRAP trials. With fortnightly residual waste collection, yields and participation rates were generally maintained. This is shown in Figure 1.

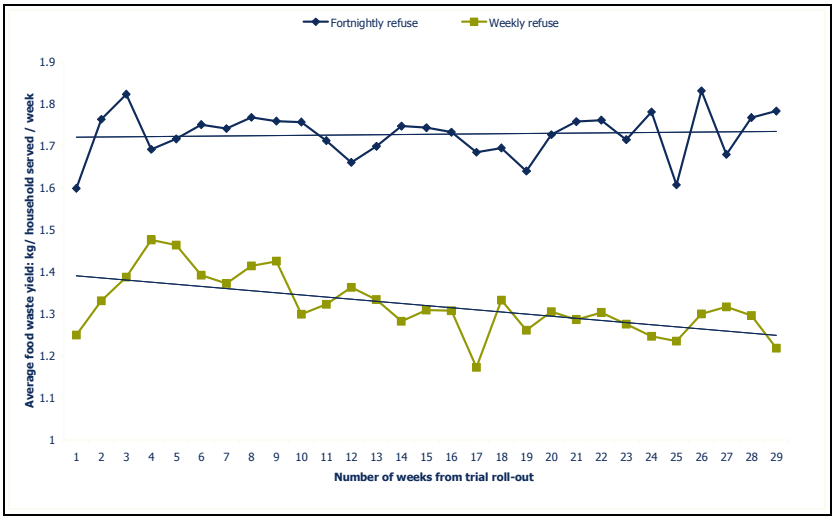


Figure 1: Effect of residual waste collection frequency on food waste collections (source: WRAP)

- **Yield of food waste per household served** – Yields were shown by the WRAP trials to be generally 20% higher with a fortnightly residual waste collection (although socio-economic factors and service communications must also be taken into account).
- **Residual waste container** - With weekly residual collections yields of separately collected food waste were higher when residual waste was collected in black bags compared with when it was collected in wheeled bins.
- **The size of wheeled bins provided for residual waste** - It is likely that the more limited the capacity of the residual bin, the more likely it is that householders will use their separate container for the collection of food waste. However, this was not studied as part of the WRAP trials.
- **Levels of deprivation** - Trials in more affluent areas tend to achieve higher yields of food waste than less affluent areas.
- **Household size** – The greater the average number of people per household the higher the yield of food waste collected.
- **Lifestyle and cultural factors** – This may affect food purchasing, preparation and consumption habits. However, this was not studied as part of the WRAP trials.
- **Amount and quality of communications** - Authorities carrying out good/frequent communications can expect to achieve higher yields of food waste.
- **Perceived concerns relating to hygiene/vermin/odour** – These may result in residents being less likely to separate their food waste from the residual waste for collection.

Collection of food waste with garden waste

A report was commissioned by WRAP in 2008 to look at the effectiveness of recycling food waste via mixed food and garden waste collections. Six authorities with established organic waste collection services were selected

for monitoring. The impact that the frequency of the food and garden waste collection was as follows:

- For food and garden waste collected weekly an average of 3.86 kg/hh/wk was collected. Where food and garden waste was collected fortnightly an average of 5.86 kg/hh/wk of waste was presented.
- The amount of food in the organic waste bin was much lower where bins were collected fortnightly (0.55 kg/hh/wk) as opposed to weekly (1.00 kg/hh/wk).
- Food waste made up around 25% (by weight) of the waste in the organic waste bin where collections of mixed food and garden waste were weekly. Where collections were fortnightly food waste was on average 9.3%.
- Weekly collections of food and garden waste captured more food waste (31.5%) than fortnightly collections (21.8%).
- For weekly collections the average set out rate was 51%. Where food and garden waste was collected fortnightly the average set out rate was higher at 58%.
- Overall, fortnightly collections of food and garden waste achieved higher participation rates when compared with weekly collections. Weekly collections showed average participation rates around 58% whereas the average participation rate for fortnightly collections was 62%. This could be because people do not have sufficient garden and food waste to justify putting their bin out every week and therefore they may put it out for collection less than weekly.

The impact of the frequency of residual waste collections was shown to be as follows:

- The amount of food remaining in the residual waste was lower where residual waste was collected fortnightly (1.57kg/hh/wk) as opposed to weekly (2.99kg/hh/wk).
- Households with fortnightly residual waste collections produced significantly less residual waste.
- Households with weekly residual waste collection captured less food waste for recycling (14.7%) than those on a fortnightly service (33.7%).

In comparison with food waste only collections the WRAP report found that on average 0.79 kg/hh/wk of food waste is diverted with a co-mingled food and garden waste collection, in comparison with 1.8 kg/hh/wk food waste in a food waste only collection. However, it is not clear whether these results are comparable (i.e. from areas with similar socio-demographic profiles and with similar indices of deprivation).

Waste auditing by ORA on behalf of another waste collection authority found that an average of 9.5 kg/hh/wk of co-mingled food and garden waste was collected (based on 5 areas audited in July/August) This is considerably higher than the figures quoted above but this may be due to a number of factors including the seasonality of garden waste arisings.

Combined collections of food and garden waste typically deliver high proportions of garden waste and may attract additional 'luxury' garden waste from householders if measures are not taken to cap total waste arisings such as introducing fortnightly residual waste collections. Although the collection of garden waste increases the recycling rate it may increase overall costs if total waste arisings are higher.

It is acceptable to charge for garden waste collections but this is not possible if garden waste is combined with food waste.

A co-mingled garden and food waste collection service can be a more expensive option than collecting food on its own in terms of treatment costs per tonne. This is because food waste needs to be processed through treatment facilities that are compliant with the Animal by-Product Regulations such as in-vessel composting (IVC) or anaerobic digestion (AD) which are more complex and expensive treatment systems than open windrow composting which can be used to treat garden waste only. If food waste is mixed with garden waste (which tends to make up the biggest proportion in these collections), the garden waste all needs to be processed at the higher cost. In addition combined schemes may fail to capture as much food as separate food waste collections.

However, if garden waste is not separately collected and is contained within the residual bin, then the local authority will have to pay for its disposal via landfill or incineration at a gate fee per tonne of £73 (post 2000 EfW) to £76 (landfill plus Landfill Tax) in comparison to £43 for IVC or AD according to the WRAP Gate Fees Report 2011.

Collection Vehicles

The choice of vehicle will depend on the anticipated tonnage of food waste to be collected, any additional materials that may be collected with the food waste (e.g. co-mingled with garden waste or cardboard), any additional materials that may be collected on the same vehicle as food waste but in a different compartment (e.g. dry recyclables), geography of the local area, property types, health and safety, existing fleet and collection rounds and the budget available. It is important to design efficient and appropriate rounds. Most food waste collection services tend to be driver plus one operator. This seems efficient in built up areas. There are also other factors to consider when collecting food waste including:

- The collection and unloading of food waste must be compliant with the requirements of the Animal by-Products Regulations
- Food waste can be collected in separate bespoke vehicles or on split back or kerbside loaded vehicles along with dry recycling or residual waste.
- Food waste has a high water content and might not easily be ejected from collection vehicles without high degrees of lift.
- Unloading directly from small vehicles into larger trucks or shipment containers will save time if the transfer stations are nearby and are well managed.

- Food waste has a high bulk density and does not compact well. Also, compacting may lead to the risk of leachate being produced. Standard refuse collection vehicles (RCV's) are not suitable for food waste only collections. Therefore there is a need to invest in specialist vehicles rather than using the existing RCV's.
- Combined food and garden waste can be collected in slightly modified RCVs (e.g. with drip trays) thus avoiding the need for additional specialist vehicles and associated back up vehicles.

Containers and Liners

The majority of the WRAP trials provided residents with kerbside containers (20-25l) and kitchen caddies (5-7l) with all but two areas supplying corn or potato starch liners.

Surveys carried out showed a high level of satisfaction with the containers and yields were higher in areas where liners were provided.

There are several supply methods that can be used by local authorities in the provision of liners:

- Residents accessing free supply of liners delivered by the local authority
    - Blanket distribution
    - Targeted distribution responding to resident requests
- Residents accessing liners through a local supply network
    - Free
    - Charged
- Residents purchasing liners from supermarkets or other retail outlets

It is more convenient for residents in flats in particular to have liners as they can then empty their food waste on the way out without having to return a caddy. However, if this method of disposal is used then liners must be carefully selected to ensure that there is limited risk of the liners splitting on transfer from the household to the disposal point.

The cost to the council of supplying free liners needs to be considered as residents used an average of 2-3 liners per household per week. The most efficient way to replace liners is for crews to do this where they can (it is not practicable in blocks of flats) or for liners to be made available at council buildings, shops etc.

If liners are not used there is a risk that participation rates will be lower, though this will vary from area to area depending on resident's willingness to pay and recycle.

Some local authorities encourage the use of newspapers to wrap food waste within the kitchen caddy. This achieves the same objectives as liners in terms of keeping the caddy clean and minimising the amount of food waste that sticks to the side of the caddy, but is achieved at no cost to the Council.

If liners are provided for residents to use with their kitchen caddy, it is important to consider any impact that they may have on the treatment facility that will manage the food waste. For example, ORA are aware that there have been some concerns arising from the use of starch liners in wet AD systems where they have the potential to cause problems in the pre-treatment process prior to entering the digester tanks, and in the digester tanks themselves where they can cause floating layers which reduce the efficiency of the digestion process and the collection of biogas.

It is also important to consider the quality of the output material from the treatment process. For example, if composters certified under the PAS100 certification scheme allowed compostable bags that are not certified to an appropriate standard to enter their process, then their PAS100 certification could be challenged. This may be a potential issue because local authorities could be keen to use suppliers of non-certified bags for lining kitchen caddies and food bins as their prices are comparatively low.

WRAP are currently carrying out a review of liners and the cost-benefit of using them in relation to the collection of food waste. The results of the study are to be published before the end of the year and would be useful in determining whether the provision of liners is appropriate for the collection of food waste in Brighton and Hove.

Communications

Good communication with residents is essential when considering a food waste collection service. The WRAP trials used a variety of communications including door-to-door canvassing, leaflets (introducing the service, instructions, follow-up), stickers on caddies, posters (in communal blocks), meetings with tenants associations, local events, press releases and website promotion.

It is considered best practice that engagement with residents is carried out early in the process to ensure understanding and gain support. Communication material should be available to all sectors of the community and in different formats on request. Adequate resources within the Council should be made available to communicate effectively with residents, especially at the implementation stage of any new service. It is recommended that a dedicated helpline or call centre be provided to residents affected by changes to their waste collection. Different methods of communication include door-stepping or road shows, promotion of the service to school children via visits to waste management sites and the provision of information on an up-to-date website.

New collection services should be branded in an appropriate manner. The logo can then be used on all communication material associated with the service allowing instant recognition by the public and continuity throughout the service.

It is considered best practice to continue providing feedback to residents throughout the duration of the service in order to provide motivational and operational information.

Surveys showed that less food waste was home composted once food waste collections were introduced. As home composting is the preferred environmental option for dealing with food waste according to the waste hierarchy, and to ensure that waste arisings do not increase, it is essential to communicate with residents about this and to heavily promote home composting when introducing a food collection service. This is especially important in Brighton and Hove given that residents are allowed to dispose of one sack of garden waste as part of their residual waste collection and that their residual waste collection frequency is likely to be reduced to alternate weekly. Encouragement of home composting could result in a decrease in the proportion of garden waste disposed of in the residual waste bin.

Frequency of Collection, Participation Rates and Set-Out Rates

The graph below from the WRAP Trials 2008 report shows the relationship between weekly and fortnightly residual waste collections and food waste yield per household served. It shows that areas with fortnightly residual waste collections have higher participation rates and yields for food waste.

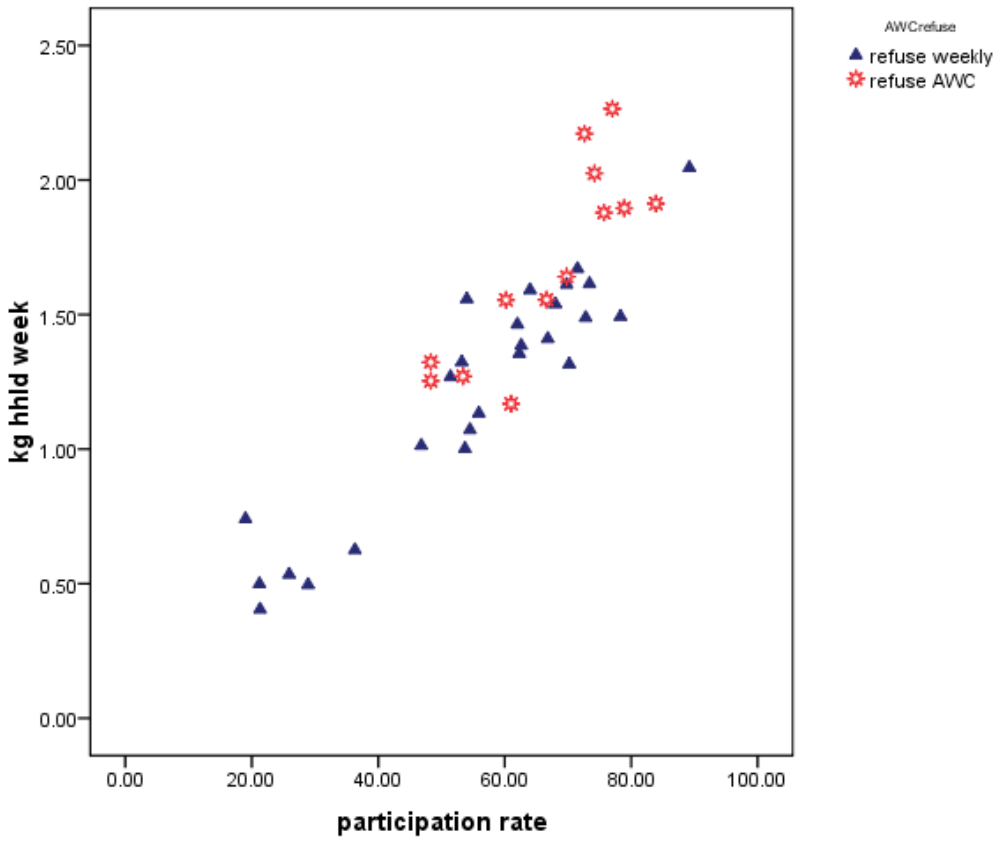


Figure 2: Participation rate and yield (per household served)

Yields of food waste are higher when residual waste is collected fortnightly and food waste is collected weekly as this acts as an incentive for households to use the weekly service.

Participation rates (the percentage of households setting out food waste at least once during a defined monitoring period)) for food waste collections are higher when there are fortnightly refuse collections. There is generally a decrease in participation from when the service is first rolled out and lower participation in multi-occupancy properties.

The set out rate (the percentage of households setting out food waste on a particular week) is found on average to be 15% lower than the participation rate.

In Brighton and Hove fortnightly residual waste collections would only really be possible in wheeled bin areas. Using the WRAP Ready Reckoner participation rates for Brighton and Hove are calculated to be 55%, with set out being 40%.

Brighton and Hove Expected Yields

There are two different methods for analysing likely food waste yields in Brighton and Hove.

1. Network Recycling Waste Audit

In 2007 Network Recycling carried out a waste compositional analysis on Brighton and Hove residual waste. It found that on average across the whole region 35% of residual waste was made up of food waste (with a further 10% being garden organics).

In 2009/10, 63,795 tonnes of kerbside residual waste was collected. Using the above analysis figures this would mean 22,328 would have been food waste. This equates to approximately 3.43 kg/hh/week of food waste that is available from the residual waste, but this assumes 100% participation and 100% capture. On the same basis the amount of garden waste being disposed of to landfill would be 6,380 tonnes per year. However it should be noted that because of the mixed nature of the housing and gardens in Brighton and Hove the total quantities and proportions of food and garden waste are likely to be highly variable dependent upon the area. It is therefore very important to take account of the specific circumstances and waste composition of the area where the trial will be undertaken.

2. WRAP 'Ready Reckoner'

Using the WRAP 'Ready Reckoner' to calculate food yields for Brighton and Hove the results are as follows:

Weekly Food Collection with:	From (kg/hh/wk):	To (kg/hh/wk):

Fortnightly Refuse	1.14	1.74
Weekly Refuse in Sacks	1.12	1.62
Weekly Refuse in Bins	0.97	1.47
Multi-occupancy	0.4	0.6

Weekly Food Collection with:	Expected Annual Yields in Brighton & Hove (tonnes per annum)		% increase in recycling (NI 192)	
	From:	To:	From:	To:
Fortnightly Refuse + Multi-occupancy	5,129	7,796	4.7%	7.2%
Weekly Refuse in Sacks + Multi-occupancy	5,060	7,386	4.7%	6.8%
Weekly Refuse in Bins + Multi-occupancy	4,548	6,873	4.2%	6.3%

Using the WRAP Ready Reckoner it is estimated that the Council could collect between 4,548 tonnes (assuming the lowest yields and weekly refuse collection in bins) and 7,796 tonnes (assuming the highest yields and fortnightly refuse collections) of food waste per annum.

These calculations suggest that had food waste collections been available for all households to use during 2009/10 the recycling rate in Brighton and Hove would have increased from 27.5% to between 31.6% and 34.6%. These figures do not take in to account increases in dry recycling as a result of moving to alternate weekly residual waste collection.

Separate modelling, specific to Brighton and Hove, has been carried out by the Organic Resource Agency and compared to modelling carried out by Council officers looking specifically at collections from suburban wheeled bin areas. These exercises indicate that the following performance can be expected in the trial area should food waste collection be introduced as part of alternate weekly residual waste collection:

Waste stream	Current Scenario	New collections including food waste and alternate weekly residual waste collection
Food	0%	10.5 - 12.4%
Recycling	31.3%	31.4 - 37.5%
Residual	68.7%	50.1 – 58.1%

Bulking up and Treatment

The most widespread treatment method for food waste is currently in-vessel composting (IVC) systems with anaerobic digestion (AD) generally recognised as being the most environmentally sustainable option.

By collecting food waste separately and then using garden waste from HWRSs it is possible to control the mix of material going into the facility which allows greater control over the composting process and the end product.

Before introducing a food waste collection scheme it is essential that the Council ensure there is somewhere for the waste to be bulked up and processed, and to have sorted logistics of vehicles delivering to the bulking up area. Also, it is important to have some idea of the expected yields, the effect this will have on residual waste collected, and the method for dealing with contamination.

Bulking up would have to take place at a Waste Transfer Station and would need to be in a closed container to address odour issues and compliance with the Animal by-Products Regulations. From here food waste could potentially be transferred to Woodlands which is an IVC facility operated by Veolia. Currently it is licensed to take 1,000 tonnes of food waste per annum so this capacity would need to be increased to manage any food waste collected. It will be especially important for the IVC to have an appropriate reception area, as well as air handling and biofilter/exhaust air treatment systems if treating food wastes. It is also important to ensure that the composting process is capable of handling this high bulk density waste and the associated leachate. Discussions need to be had with Veolia on this option.

Costs

Costs of offering a food waste collection service will depend on:

- Method of collection (with other materials or separately)
- Productivity levels
- Type of fleet and operative costs
- Containers/liners for residents
- Participation/set out levels
- Communications used

They will vary significantly depending on local circumstances, and therefore a detailed cost analysis needs to be carried out specifically for Brighton and Hove. This work is being done with support from WRAP using their Kerbside Analysis Tool (KAT).

WRAP analysis of other food waste only collections showed that costs of collections are split as per the pie chart in Figure 3.. Although this will vary between authorities it does give an indication of the areas where the main spending occurs.

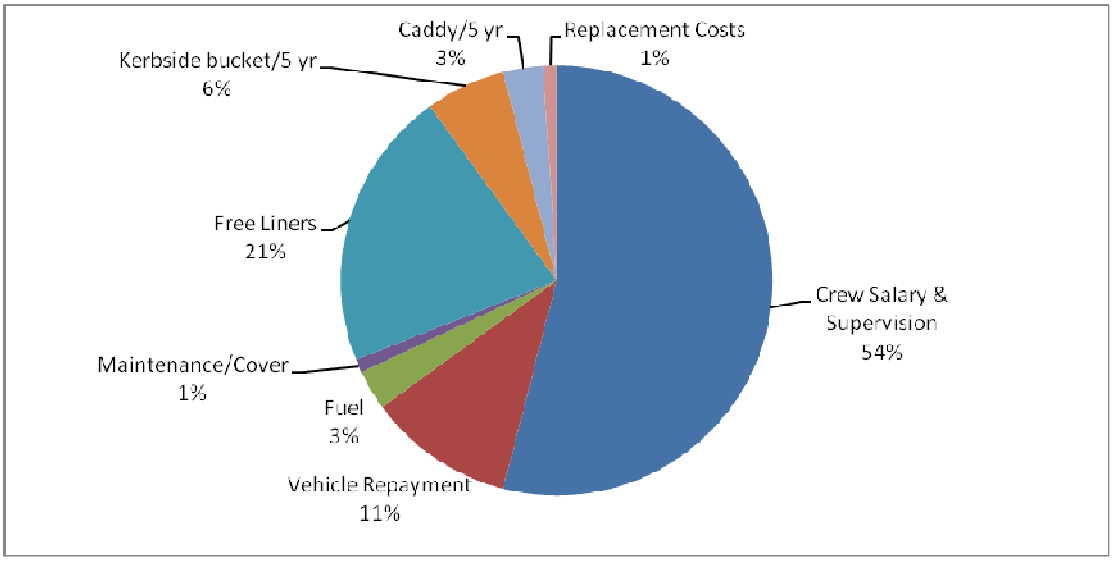


Figure 3: Collection cost breakdown

Liners costs on average £3.50 per participating household per year (or £2.00 per household across the local authority area). Given agricultural commodity and production costs it is likely that the price of liners will increase considerably over the coming years. Currently for Brighton and Hove the cost of providing liners to all households would amount to annual costs in the region of £250,000 p.a. However, this is really the only truly avoidable cost associated with the collection of food waste. Liners could just be provided to blocks of flats, which would bring costs down to approximately £70,000 per annum.

Environmental Impact

WRAP looked at the end-of-life options (but not full Life Cycle Analysis options) for:

- Various types of composting
- Incineration with energy recovery
- Landfill
- Anaerobic digestion

Anaerobic digestion was identified as the preferred option. The results of independent modelling show that environmental benefits are more significant when food is sent to AD rather than IVC.

Following AD; composting and energy recovery are generally comparable in their contribution to climate change potential.

Composting brings benefits as the compost produced can be used as a substitute for products such as peat or fertilisers. However, as composting does not recover energy, it generally does not perform well compared to the other food waste treatment options for depletion of natural resources and energy demand.

WRAP found incineration with energy recovery presents good environmental performance, despite the relatively low heating value. The benefits of incineration are greater if the energy produced substitute's fossil fuel.

The Organic Resource Agency are carrying out a full life cycle analysis of the options for food waste treatment using the Waste and Resources Assessment Tool for the Environment (WRATE) and the results of this modelling will be taken into account when designing the food waste collection and treatment service for Brighton and Hove.

Food waste from schools
A WRAP report estimates that food waste makes up by weight half of all primary school waste and one third of secondary school waste. Although further work would be needed, with such significant quantities from single collections the Council may wish to consider school food waste collections as part of any food collection service that is introduced. For example, primary schools were found to produce 72 grams per pupil per day. Assuming a school of 100 pupils this would mean 36kg per week.

Commercial food waste
The Council could consider integrating the collection of food waste from commercial properties alongside the collection of household food waste in order to optimise the efficiency of collection rounds.

The collection of food waste from small and medium sized enterprises (SME's) by local authorities is becoming more attractive as a result of the change in the definition of 'municipal waste' for the purposes of reporting under the EU Landfill Directive. It is no longer defined as 'the waste collected by, or on behalf of, local authorities'. Instead, the revised definition covers household and other 'similar' wastes produced by businesses. In addition, the Landfill Allowance Trading Scheme (LATS) is now likely to end in 2012/2013.

If the Council were to consider including commercial food waste with their household food waste collections careful consideration would need to be given to the charging mechanism to be applied in order to ensure that fair payment was received for such services.

ORA are aware that WRAP may be providing funding for local authorities wishing to collect food waste from SME's towards the end of 2011 and this may be a means of developing this service if appropriate.

Initial conclusions and recommendations for Brighton and Hove
If the Council were to go ahead with food waste collections it would be recommended to introduce fortnightly residual waste collections in wheeled bin areas. In the communal bin areas collection would be more difficult and may result in lower yields of food waste collected.

As there is currently no local AD facility, separately collected organic waste is likely to be transferred to Woodlands which has an IVC facility.

The current residual and recycling waste services provided in Brighton and Hove are shown in the following table.

Waste stream	Collection frequency	Container	Collection vehicle
Residual	Weekly	140l wheeled bin	Compaction vehicle
Recycling	Fortnightly	Black boxes	Kerbside vehicle
Food	None	None	None

Giving consideration to the current waste and recycling services as shown above a number of options have been considered for the collection of food waste and modification of other services in order to optimise recycling rates, maximise diversion from landfill or incineration, and minimise total waste arisings.

The options include:

Option 1

Waste stream	Collection frequency
Residual	Fortnightly
Recycling	Weekly
Food	Weekly

This option may result in an increase in dry recycling rates as collection frequency moves from fortnightly to weekly. Dry recycling, food and residual waste are all collected in separate vehicles. This option was modelled as part of the development of the strategy in 2009 and the increase in recycling did not off set the extra costs associated with weekly collection frequency. Brighton and Hove already has a high dry recycling rate and fortnightly residual waste collection would increase that further without the need to change recycling collections to weekly.

Option 2

Waste stream	Collection frequency
Residual	Fortnightly
Recycling/ Food	Weekly

This option is similar to Option 1, however food waste and recycling are collected on the same vehicle on a weekly basis. These vehicles would need three compartments; one for food, one for paper, card, cans and plastic bottles, and one for food waste. Research by WRAP has shown that this is often not the most efficient collection method as one compartment is likely to fill up before the two others requiring emptying and therefore losing collection time.

Option 3

Waste stream	Collection frequency
Residual	Fortnightly
Recycling	Fortnightly
Food	Weekly

This is the preferred option based on much of the research carried out. In this option

- Food waste is collected weekly on a separate bespoke vehicle
- Residual waste is collected fortnightly as all the evidence shows that this significantly improves the tonnage of food and dry recycling collected
- The reduction in residual waste collection frequency and the increase in recycling and composting contribute to the funding of the new food waste collection service

The total number of collections per household increases from 1.5 per week (weekly refuse/ fortnightly recycling) to 2 collections per week (weekly food/ fortnightly refuse/ fortnightly recycling).

Next Steps

The next stage of work is to develop detailed proposals for a food waste collection trial based on the preferred Option 3.

Further Reading

1. WRAP – Food Waste Collection Guidance – July 2009
2. WRAP – Evaluation of the WRAP Separate Food Waste Collection Trials – June 2009
3. WRAP – Food Waste Collection Trials – weekly collections of food waste operating alongside alternate weekly collections of refuse
4. WRAP – Food Waste Collection Trials – weekly collections of food waste in low and medium density housing areas
5. WRAP – Food Waste Collection Trials – collections of weekly food waste in high density housing areas
6. WRAP Food Waste Collection Trials – food waste collections from multi-occupancy dwellings
7. WRAP – Food Waste Collection Trials – Communications
8. WRAP – Food Waste Collection Trials – use of liners for kerbside containers and kitchen caddies
9. WRAP – Performance analysis of mixed food and garden waste collection schemes
10. WRAP – Environmental benefits of recycling – 2010 update
11. WRAP - Household Food and Drink Waste in the UK
12. WRAP – Food Waste in Schools
13. Beyond Waste – Revised LCA Results
14. Eunomia Research and Consulting – Food Waste Collection: Update to WRAP Biowaste Cost Benefit Study
15. LGA media release – 9th April 2011
16. Network Recycling - Household Waste Compositional Analysis Project – Comparative Report – July 2007
17. Defra – Introductory Guide to Options for the Diversion of Biodegradable Municipal Waste from Landfill
18. Enhancing Participation in Kitchen Waste Collections – Defra Waste & Resources Evidence Programme (WR0209)

19. Zero Waste Scotland – ‘ Scottish Food Waste Collection Trial – Performance and Evaluation’
20. Welsh Local Government Association and MEL – ‘Evaluation of Food Waste Collections - Fin–l Report', April 2011
21. ORA Ltd – ‘Implementation of best practice for the kerbside collection of biodegradable municipal waste - Tonbridge and Malling Borough Council: A Case Study in Best Practice’, December 2005
22. ORA Ltd – ‘Pilot food waste collection trials in Milton Keynes 2005-2006’, January 2007
23. Eunomia – ‘Anaerobic Digestion Market Outlook – Overcoming Constraints to Deliver New Infrastructure’, July 2011

Environmental impact assessment of alternate weekly residual waste collection with weekly food waste collection using WRATE

DRAFT REPORT for:

Brighton & Hove City Council

27th October 2011

ORA
ORGANIC RESOURCE AGENCY LTD

Client:	**Brighton & Hove City Council**
Client Address:	CityClean Hollingdean Depot Upper Hollingdean Road Brighton BN1 7GA
Report title:	**Environmental impact assessment of alternate weekly residual waste collection with weekly food waste collection using WRATE**
Project Code	288-11
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Contents

1 Executive summary

A life cycle assessment was carried out by the Organic Resource Agency on behalf of Brighton and Hove City Council to assess the environmental impact of reducing residual waste collections to alternate weeks and introduction of a weekly food waste collection to the 'suburban' residents of Brighton and Hove. Two future scenarios were modelled including food waste collections – one utilising anaerobic digestion and one in-vessel composting. It was found that although small environmental gains could be made through both treatment options, the advantages were not large in both cases, as the Council have invested in modern energy from waste technology and little material is landfilled. Transport use was found to be the largest environmental burden under all collection scenarios.

2 Introduction

The Organic Resource Agency Ltd (ORA) was asked by Brighton & Hove City Council (the Council) to undertake an independent life cycle assessment (LCA) which would quantify the impact on the environment from the introduction of a weekly food waste collection service and fortnightly residual waste collection to the city's suburban population.

3 WRATE

3.1 Using WRATE

ORA's favoured method of conducting an LCA for municipally collected waste is to use WRATE (the Waste and Resources Assessment Tool for the Environment). WRATE is a software package administered by the Environment Agency for conducting LCA analyses for waste management scenarios. It has been specifically developed for modelling the flows of municipal waste and the various treatments which are currently found in the UK.

3.2 Limitations of the software

The accuracy of the results from WRATE are dependent on a number of factors, but most importantly, the data on which it is based and the method of calculation within the model. The data on which the model is based has been obtained from a variety of organisations and literature. This data has been peer reviewed, and although disagreements may always occur, ORA feels that the review process puts WRATE in a strong position to produce useful results.

WRATE cannot handle every imaginable waste management scenario, and so compromises have to be made in order to model reality. For example, the model does not contain data to model semi-dry scrubbing systems in incinerators (such as that employed at Newhaven), and so the closest matching process must be modelled instead (dry scrubbing in the Newhaven case). Another limitation of the software is that battery recycling is not accounted for, and so the final results do not include the impact from this.

WRATE is also limited, along with all methods of LCA, regarding the underlying science on which it is based. For example as climate science has advanced, our knowledge of the relative impact from different greenhouse gases on global warming has increased. This has led to changes in the weighting applied to different gases in the GWP (global warming potential) assessment. WRATE is based on up-to-date weighting in this respect although this is likely to change in the future as our understanding advances.

The version of the software used by ORA was WRATE v.2.0.1.4.

3.3 Objectives

The objective of this work is to provide the Council with an independent LCA which models and shows the difference between likely future waste management scenarios in terms of their impact on the environment.

3.4 Scope

Due to the practicalities of implementing a food waste collection scheme across the whole of Brighton and Hove, ORA was asked to carry out the LCA on the city's suburban population which numbers around 80,000 households, excluding houses of multiple occupancy (HMOs) and flats.

4 Methodology

4.1 Calculation of composition and tonnage

The composition of residual waste and recycling found in the 2007 waste audits performed on behalf of the Council was re-proportioned according to the ACORN[1] categories shown in Table 1 which represent 'suburban' Brighton and Hove. This new composition, combined with current tonnage information from the Council forms the basis for the baseline scenario (see Section 4.2).

The baseline tonnage and composition were then passed through the "tonnage impact model" which was previously developed by ORA to predict the change that introduction of alternate weekly residual waste collections and collection of food waste would have. This then provided a future waste composition (for residual waste, recycling and food) which could be used in the AWC scenarios (see Section 4.2). The compositions of waste used in the model are shown in Appendix A and the translation of categories from the Council audit to WRATE in Appendix B.

4.2 Scenarios

Three scenarios were modelled in the LCA. In all of these 95% of the residual waste is treated through incineration at Newhaven and 5% is landfilled at Lidsey, West Sussex. Scenario maps showing the flow of material through the process are shown in Appendix D. The three scenarios are:

1. **Baseline**. This scenario models a situation where there is no separate food waste collection and residual waste is collected weekly. Recyclates are collected on alternate weeks.

2. **AWC with AD**. This scenario models a weekly food waste collection and alternate weekly collection of residual waste and dry recyclables. The food waste is sent to a hypothetical anaerobic digestion facility at Whitesmith, East Sussex. Dense plastic and aluminium foil recycling are offered as additional recyclables.

3. **AWC with IVC**. This scenario models a weekly food waste collection and alternate weekly collection of residual waste and dry recyclables. The food waste is sent to the existing in-vessel composting (IVC) facility at Whitesmith. Dense plastic and aluminium foil recycling are offered as additional recyclables.

[1] ACORN = A Classification Of Residential Neighbourhoods

5 Assumptions

The waste composition used in the LCA is based on a series of audits carried out on behalf of the Council in 2007 for both residual waste and recycling. These audits separately accounted for time of year (split into four phases) and different socio-economic groups (split by ACORN category. This provided ORA with a large body of information from which to work. The tonnage of waste and recycling currently generated by residents was provided by the Council, split into different collection rounds.

For the purposes of the LCA three collection rounds were used on which to base the model. These were West Hove (food waste trial area), Saltdean and Lower Hollingbury as it was felt that combined, these three areas would represent 'suburban' Brighton and Hove. The ACORN breakdown of these areas was provided by the Council and is shown in Table 1.

	West Hove	Saltdean	Lower Hollingbury	Total
ACORN 1	825	3,068	785	4,678
ACORN 2	1,840	11	1,322	3,173
ACORN 3	2,152	1,964	2,870	6,986
ACORN 4	1,201	316	342	1,859
ACORN 5	196	0	327	523

Table 1: Number of households split by ACORN category in sample areas. ACORN 1 represents "wealthy achievers", ACORN 2 represents "urban prosperity", ACORN 3 represents "comfortably off", ACORN 4 represents "moderate means" and ACORN 5 represents "hard pressed".

The two future scenarios which include the implementation of a food waste collection scheme have a number of assumptions in terms of the overall amount of waste which is diverted. It is assumed that for food waste a 62% capture rate and a 66% participation rate are realistic. These figures were provided by the Council's own modelling exercise and give an overall rate of 41% recycling for this stream. The additional dry recyclable materials which residents will also be able to recycle, namely dense plastic and aluminium foil, are assumed to have the same capture and participation rates as existing dry recyclables before implementation of the new scheme.

Contamination in the food waste stream is not accounted for in the WRATE model. Although contamination would have an operational effect on processing facilities it should not have a major effect on the environmental burdens assessed as part of the LCA.

The electricity mix which is used in WRATE for offsetting environmental burdens is that for “UK 2011”. Therefore this modelling exercise would give a different result if it was repeated in the future. An increasing amount of renewables in future electricity mixes will reduce environmental savings which are made currently via incineration and anaerobic digestion.

6 Results

The results from the WRATE LCA are shown graphically in Figures 1 to 6 and tabulated in Appendix C. These are the six high level environmental burdens:

- global warming potential (GWP)
- acidification (acid rain)
- eutrophication
- freshwater aquatic ecotoxicity
- human toxicity
- resource depletion

Graphs showing the impact from the three scenarios (Figures 1 to 6) include a breakdown of each scenario to show which components of the waste management system have the most effect. The components are:

- Collection (this represents waste receptacles only)
- Transportation
- Intermediate facilities (includes transfer station and MRF)
- Recycling (impact from recycling materials)
- Treatment and recovery (includes EfW, AD and IVC)
- Landfill

For example the global warming potential results (Figure 1) show that in all scenarios, recycling has the largest effect, followed by treatment and recovery.

Whilst positive results (above the bold lines) represent detrimental environmental impacts such as emissions and acidification, negative results (below the bold lines) should be interpreted as environmentally beneficial due to offsets such as electricity production and the avoidance of virgin material use.

A second set of graphs are presented in Figures 7 to 12 which show the sum contribution from of all contributing parts of the waste management process. For example, the totals for global warming potential in Figure 7 show the sum of the contributing parts of the process in Figure 1.

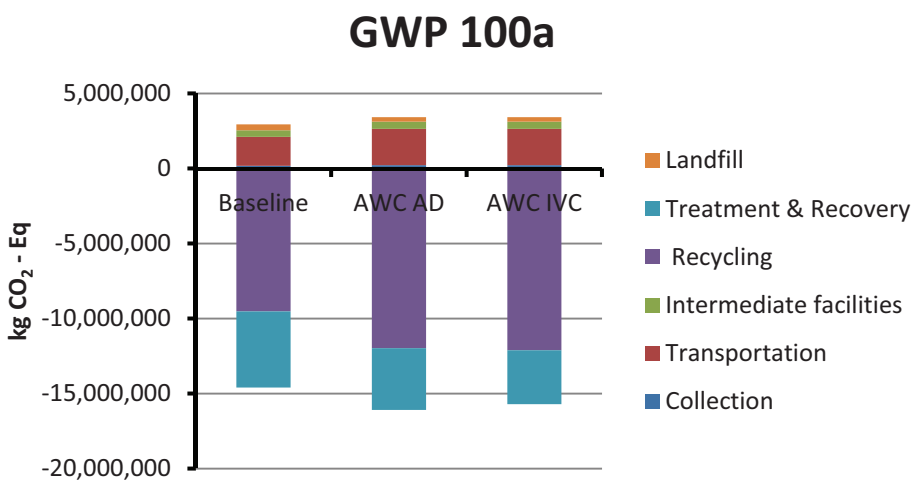


Figure 1: Breakdown of results for global warming potential

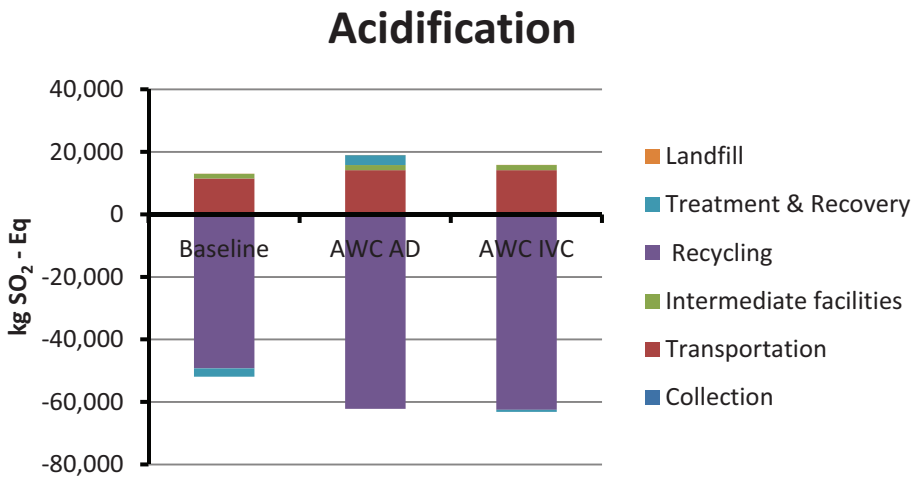


Figure 2: Breakdown of results for acidification

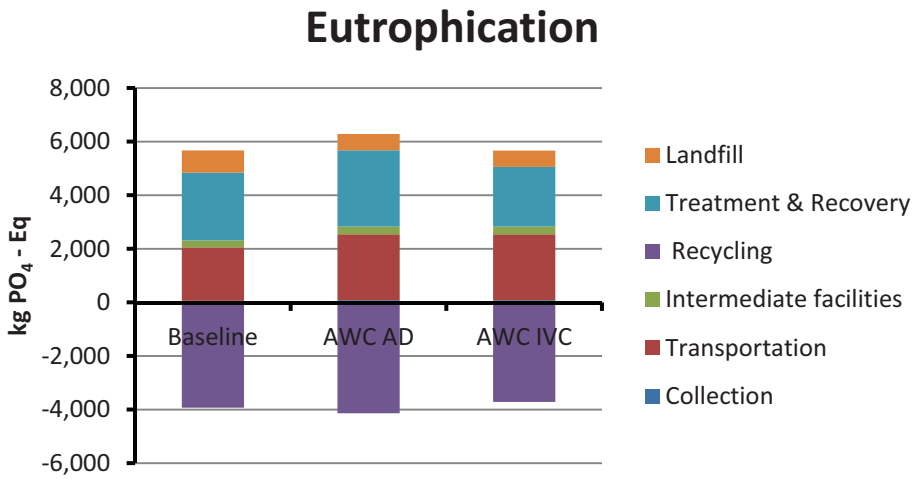


Figure 3: Breakdown of results for eutrophication

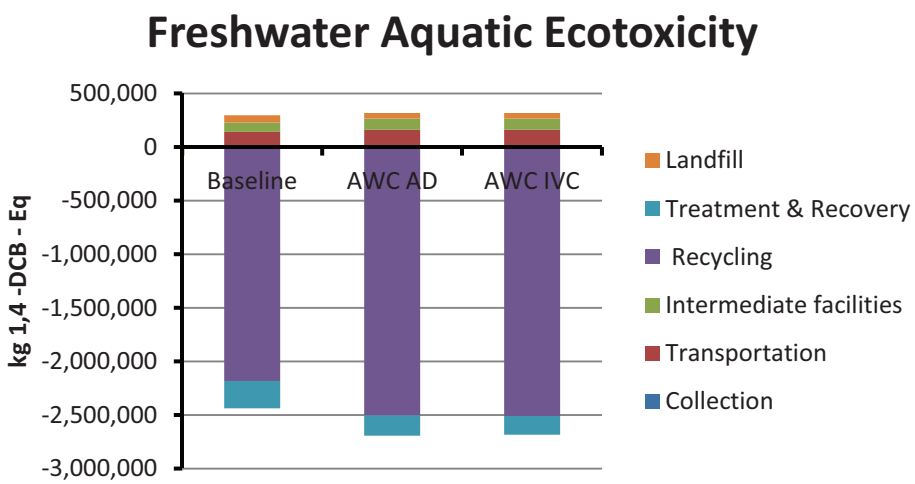


Figure 4: Breakdown of results for freshwater aquatic ecotoxicity

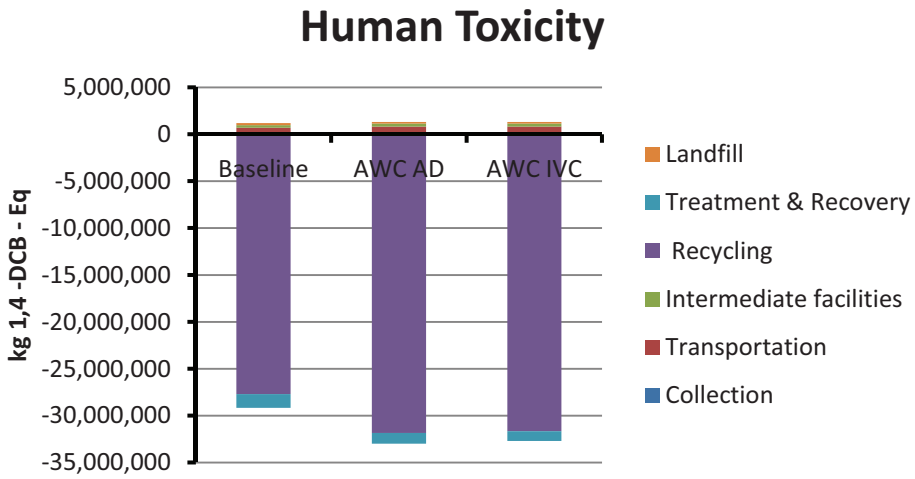


Figure 5: Breakdown of results for human toxicity

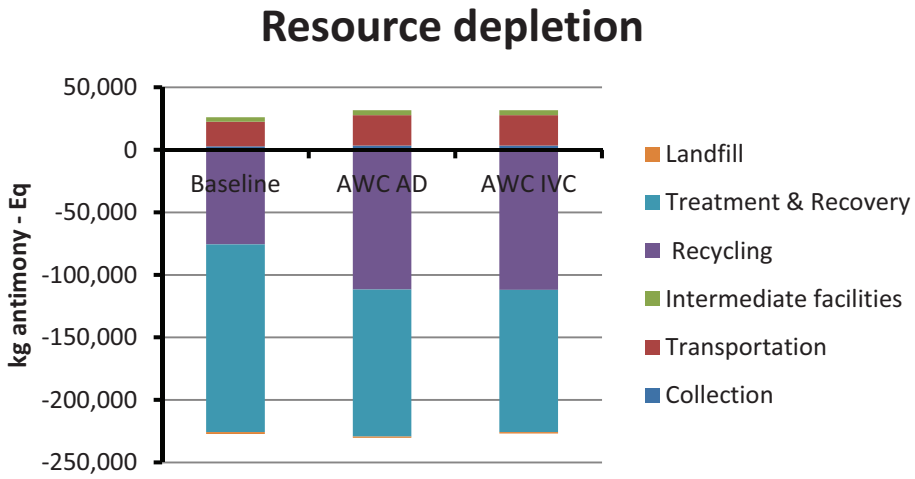


Figure 6: Breakdown of results for resource depletion

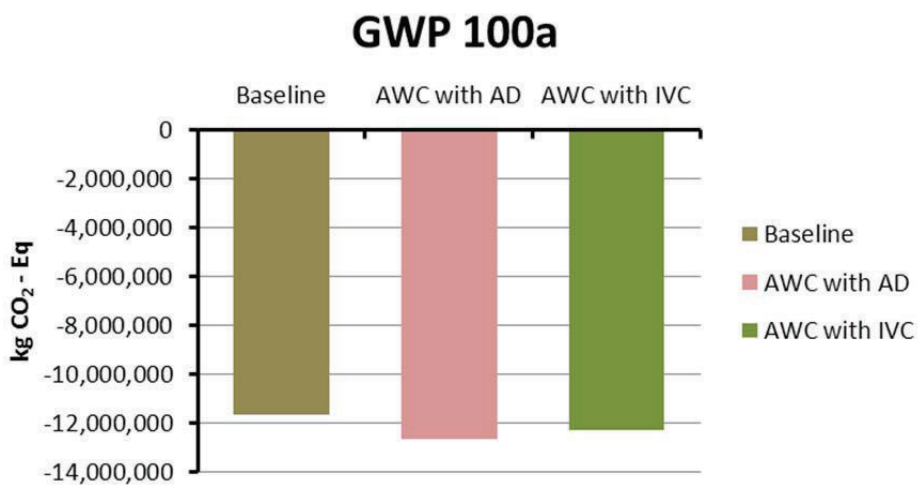


Figure 7: Total of results for global warming potential

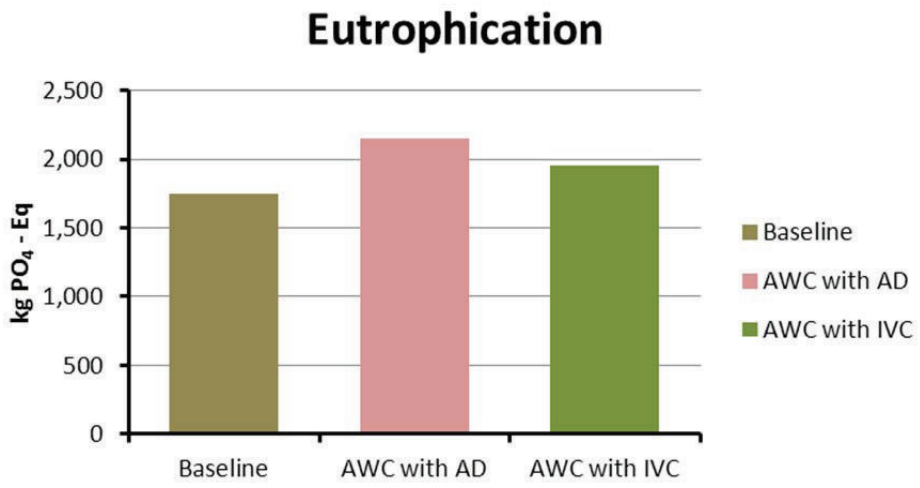


Figure 8: Total of results for eutrophication

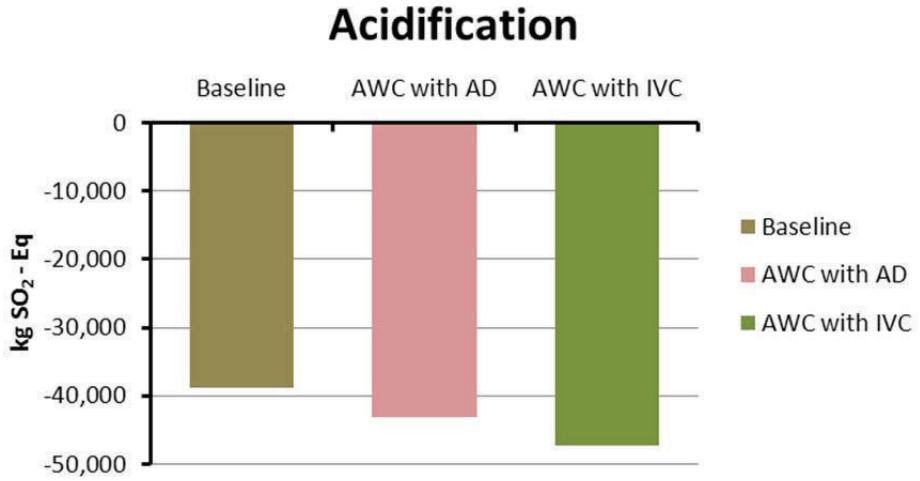


Figure 9: Total of results for acidification

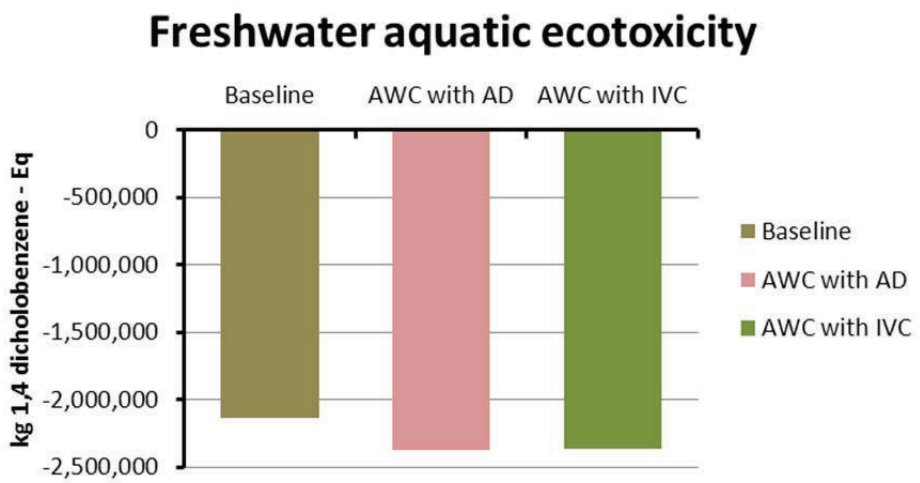


Figure 10: Total of results for freshwater aquatic ecotoxicity

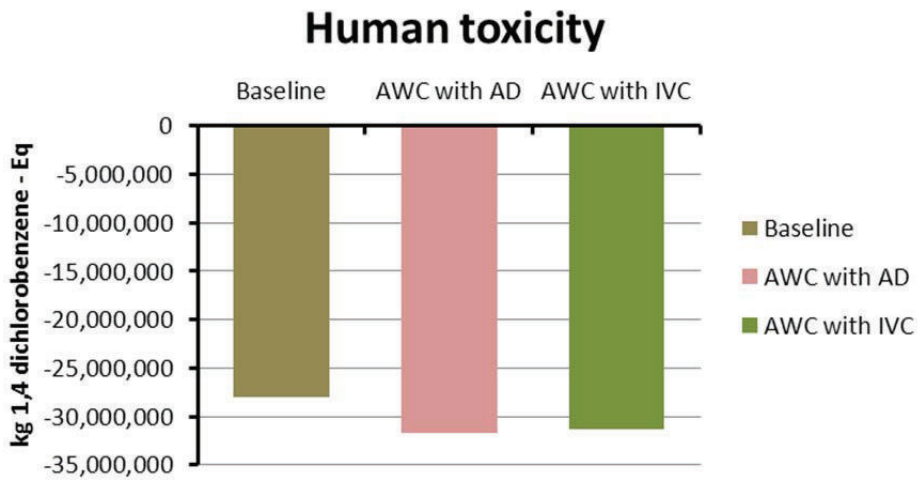


Figure 11: Total of results for human toxicity

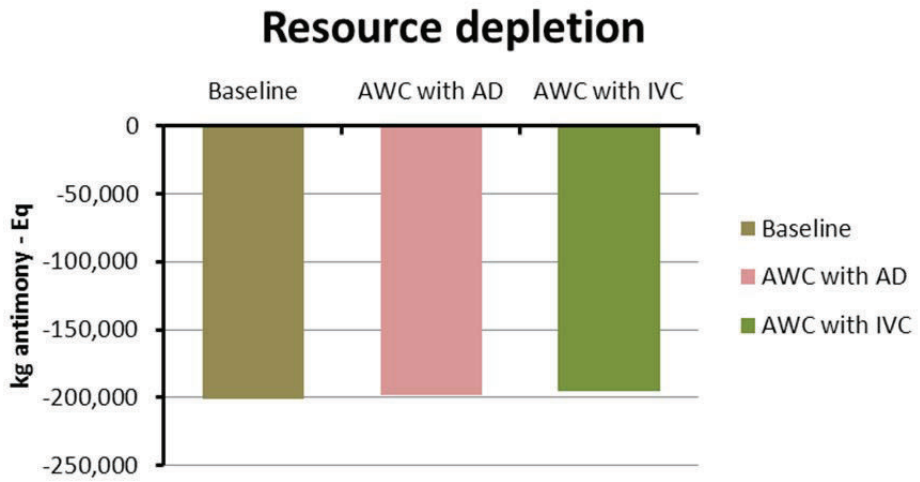


Figure 12: Total of results for resource depletion

WRATE also provides an alternative method of presenting results which uses 'European person equivalent'. To allow meaningful comparison between results, this normalises the results. Instead of presenting results in their traditional units, the normalisation allows results to all be presented as the equivalent number of 'average Europeans' which would have the same effect on the environment as this project.

For example, with reference to Table 2, the AWC with AD scenario saves the equivalent greenhouse gas emissions that 980 average Europeans would in one year, whilst the amount of resources saved would be equivalent to that used by 5,139 average Europeans. This can be seen graphically in Figure 13.

	Baseline	AWC with AD	AWC with IVC	*Units*
GWP 100a	-902	-980	-950	Eur. Person - Eq
Acidification	-543	-603	-662	Eur. Person - Eq
Eutrophication	52	64	59	Eur. Person - Eq
Freshwater aquatic ecotoxicity	-1,623	-1,801	-1,794	Eur. Person - Eq
Human toxicity	-1,415	-1,602	-1,588	Eur. Person - Eq
Resource depletion	-5,204	-5,139	-5,049	Eur. Person - Eq

Table 2: Normalised results for European person equivalent

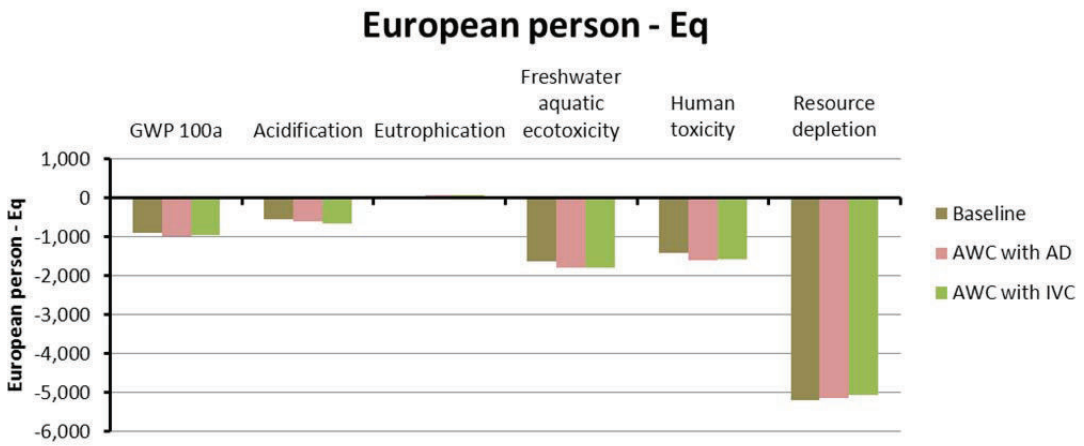


Figure 13: Normalised results for European person equivalent

7 Discussion

Comparison of the scenarios for each environmental burden is best made with reference to Figures 7 to 12. For all of the burdens the difference between scenarios is modest, with the largest difference being for acidification between the baseline and AWC with IVC (22% saving for the latter scenario). The difference between scenarios is small because the Council have already shifted away from a reliance on landfill and invested in Energy from Waste (EfW) which has some considerable offsets such as electricity production. Also, being a new facility, the Newhaven EfW is more efficient than older facilities. EfW is a major feature in all of the scenarios and this combined with fairly consistent transport use means other changes will be limited in their effect.

Global warming potential (GWP) measures the relative contribution that different greenhouse gases (GHG) make to global warming over a period of time. GWP is measured relative to carbon dioxide which is given a GWP of one. The different greenhouse gases are weighted in WRATE depending on their effect on global warming.

Figures for GWP have a timespan attached to them. This timespan is the period over which a given gas will have a certain global warming potential. A period of 100 years (100a) is most commonly used, and in this study this is the chosen time period. In this instance, moving from the baseline to AWC with IVC scenario would save 620 tonnes CO_2 (equivalent) per annum which is the equivalent to that emitted by 48 'average Europeans' (see Table 2).

The other burdens are weighted in a similar manner to GWP providing an 'equivalent' unit to work from. For example in quantifying resource depletion units are given in terms of kg of antimony. Resources contributing to this are weighted according to abundance. Figure 6 shows the breakdown of the resource depletion figures and it can be seen that recycling and the treatment/recovery components contribute the largest savings. This is due to offset virgin material use from recycling and offset fossil fuel use in electricity production. The largest component which depletes resources in all scenarios is transport. Transport is the worst performing component in all the environmental burdens with the exception of eutrophication, although the effect of the scenarios on eutrophication can be seen to be small in Figure 13.

8 Conclusions

In conclusion, based on this WRATE modelling exercise, the investment by the Council in EfW means that environmental savings from the implementation of alternate weekly residual waste collections with a weekly food collection, whether treated by AD or IVC is small although there are environmental advantages to be gained.

There is very little difference in the environmental impacts associated with treating the food waste at an AD facility or an IVC facility. Treatment of food waste via AD does perform better then IVC in terms of the following environmental burdens:

- Global warming potential
- Freshwater aquatic toxicity
- Human toxicity
- Resource depletion

In contrast, treatment of food waste via IVC performs better than AD in terms of these environmental burdens:

- Eutrophication
- Acidification

The results generated by WRATE are based upon the development of new facilities to treat the wastes modelled. As the Council already has use of an existing IVC facility ORA recommends that food waste should be processed at this facility if possible, rather than building a new AD facility as this would avoid the environmental impacts s associated with construction.

9 Appendices

Appendix A: Data used

A1. Waste composition

WRATE category	Baseline residual %	Baseline recycling %	AWC residual %	AWC recycling %
Paper and Card:				
Newspapers	3.73	39.48	0.92	36.44
Magazines	0.44	2.82	0.59	2.15
Recyclable paper	3.96	8.69	4.15	8.43
Other paper	3.73	2.54	5.02	1.92
Card packaging	2.92	9.86	2.89	9.12
Plastic film:				
Bags	2.89	0.37	3.89	0.27
Other plastic film	4.20	0.25	5.67	0.19
Dense plastic:				
Drinks bottles	0.60	2.42	0.53	2.28
Other bottles	0.66	2.20	0.62	2.08
Other dense plastic	5.69	0.53	2.41	8.39
Textiles:				
Unspecified textiles	3.47	0.08	4.65	0.06
Absorbent hygiene products:				
Disposable nappies	4.58	0.00	6.17	0.00
Other	0.41	0.00	0.56	0.00
Wood:				
Non-packaging wood	0.57	0.00	0.77	0.00
Combustibles:				
Unspecified Combustibles	2.96	0.00	3.99	0.00
Shoes	0.20	0.00	0.27	0.00
Other Combustibles	1.30	0.06	1.76	0.05
Non-combustibles:				
Unspecified non-combustibles	3.25	0.09	4.39	0.07
Soil	1.05	0.00	1.41	0.00
Glass:				
Non-packaging glass	0.77	0.10	1.04	0.07
Green bottles	0.82	12.77	0.27	11.03

WRATE category	Baseline residual %	Baseline recycling %	AWC residual %	AWC recycling %
Clear bottles	1.95	11.65	1.40	10.77
Brown bottles	0.24	2.05	0.18	1.78
Organic:				
Garden waste	7.59	0.06	10.22	0.05
Food waste	34.86	0.01	27.77	0.00
Organic pet bedding/litter	0.84	0.00	1.13	0.00
Other organics	0.66	0.00	0.89	0.01
Ferrous metals:				
Steel food and drink cans	1.26	3.04	1.29	2.95
Other ferrous metal	0.49	0.02	0.66	0.01
Non-ferrous metals:				
Aluminium drinks cans	0.29	0.77	0.31	0.71
Foil	0.74	0.01	0.31	1.05
Other non-ferrous metal	0.39	0.03	0.51	0.02
Fine material (<10mm):				
Unspecified fine material	0.86	0.00	1.16	0.00
Waste electrical and electronic equipment:				
Unspecified WEEE	0.86	0.01	1.16	0.01
Other WEEE	0.02	0.00	0.03	0.00
Specific hazardous household:				
Unspecified hazardous	0.08	0.00	0.11	0.00
Batteries	0.08	0.09	0.10	0.09
Paint/varnish	0.54	0.00	0.73	0.00
Oil	0.05	0.00	0.07	0.00

A2. Bin size distribution

Residual bin sizes were distributed according to the Council's bin size audit. For residual waste this is 140 litres – 82.7%, 240 litres – 16.7% and 360 litres – 0.6%. Two recycling bins were allocated to each of the 80,000 households (dry recyclables + glass). For food waste an additional two bins were allocated

to each household (one internal, one external). WRATE does not have an allowance for external food waste bins and so a pair of internal ones were selected.

A3. Transportation

Transport	Distance (A-B unless stated) km
Baseline residual collection	110,448 (per annum)
Baseline recycling collection	64,688 (per annum)
Transfer station to Newhaven EfW	24
Transfer station to Lidsey landfill	50
Train EfW to bottom ash processer	112
EfW to ferrous processor	10
MRF plastics to Dagenham	111
MRF plastics to South Normanton	320
MRF glass to Bromley	94
MRF glass to South Kirkby	388
MRF ferrous to Pontypool	308
MRF ferrous to Llanelli	397
MRF ferrous to Port Talbot	361
MRF ferrous to Lewes	13
MRF non-ferrous to Swindon	206
MRF non-ferrous to Warrington	408
MRF non-ferrous to Birmingham	284
MRF paper to Shotton	438
MRF paper to Aylesford	101
MRF card to Newhaven	24
MRF card to Snodland	97
AWC residual collection	55,224 (per annum)
AWC recycling collection	64,688 (per annum)
AWC food waste collection	110,448 (per annum)
Transfer station to IVC/AD	36

A4. Treatment, recovery and disposal

EfW: Gross electrical efficiency: 29%
Gas cleaning system: dry
Reduction type: SNCR

AD: Wet

IVC: Forced aeration producing ABRP compliant, PAS100 compost.

Landfill: Details unknown, although clay liner, clay cap selected.

Appendix B: Waste composition categories

WRATE category	Brighton & Hove audit category
Paper and Card:	
Newspapers	Newsprint grade paper
Magazines	Catalogues
Recyclable paper	Household paper
Other paper	Yellow pages Non-recyclable but compostable paper Non-recyclable non-compostable paper
Card packaging	Corrugated card Flat card
Plastic film:	
Bags	Refuse sacks Carrier bags
Other plastic film	All other plastic film
Dense plastic:	
Drinks bottles	PET bottles
Other bottles	HDPE bottles PVC bottles
Other dense plastic	All other dense plastic
Textiles:	
Unspecified textiles	Potentially recyclable / reusable textiles Cleaning textiles / rags
Absorbent hygiene products:	
Disposable nappies	Nappies
Other	Other sanitary
Wood:	
Non-packaging wood	Wood Wood composite
Combustibles:	
Unspecified Combustibles	Pet excrement (not bedding)
Shoes	Shoes
Other Combustibles	Composite packaging (predominantly card) Composite packaging (predominantly not card)
Non-combustibles:	
Unspecified non-combustibles	Other items suitable for reuse Miscellaneous
Soil	Garden soil and pot plants
Glass:	
Non-packaging glass	Non-recyclable glass
Green bottles	Green
Clear bottles	Clear

WRATE category	Brighton & Hove audit category
Brown bottles	Brown
Organic:	
Garden waste	Garden woody organic Garden other organic
Food waste	Kitchen home compostable Kitchen other organics
Organic pet bedding/litter	Pet bedding
Other organics	Liquid foodstuffs
Ferrous metals:	
Steel food and drink cans	Ferrous cans and packaging
Other ferrous metal	Other ferrous metals
Non-ferrous metals:	
Aluminium drinks cans	Aluminium cans
Foil	Aluminium foil
Other non-ferrous metal	Other non-ferrous metals Aerosols
Fine material (<10mm):	
Unspecified fine material	Fines
Waste electrical and electronic equipment:	
Unspecified WEEE	All WEEE categories
Other WEEE	Fluorescent tubes and low energy/energy efficient light bulbs
Specific hazardous household:	
Unspecified hazardous	Non-recyclable – cleaners and other chemicals, clinical, asbestos
Batteries	Batteries
Paint/varnish	Paint and related products
Oil	Cooking oil Mineral oil

Appendix C - Tabulated results

	GWP 100a (kg CO_2 - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	178,513	1,938,260	433,273	-9,522,887	-5,074,174	390,465	**-11,656,550**
AWC AD	223,626	2,419,609	486,038	-11,974,576	-4,113,786	295,644	**-12,663,445**
AWC IVC	223,626	2,419,609	486,038	-12,106,689	-3,595,144	295,644	**-12,276,916**

Results of LCA – Global Warming Potential

	Acidification (kg SO_2 - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	611	10,871	1,505	-49,247	-2,643	44	**-38,859**
AWC AD	779	13,411	1,632	-62,190	3,166	31	**-43,171**
AWC IVC	779	13,411	1,632	-62,495	-682	31	**-47,324**

Results of LCA – Acidification

	Eutrophication (kg PO_4 - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	61	1,995	260	-3,929	2,527	831	**1,745**
AWC AD	82	2,465	285	-4,140	2,846	610	**2,148**
AWC IVC	82	2,465	285	-3,712	2,228	610	**1,958**

Results of LCA – Eutrophication

	Freshwater Aquatic Ecotoxicity (kg 1,4 -DCB - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	12,397	129,115	87,685	-2,182,827	-255,111	68,624	**-2,140,117**
AWC AD	12,841	149,168	104,048	-2,502,997	-190,295	52,540	**-2,374,695**
AWC IVC	12,841	149,168	104,048	-2,508,852	-175,507	52,540	**-2,365,762**

Results of LCA – Freshwater aquatic ecotoxicity

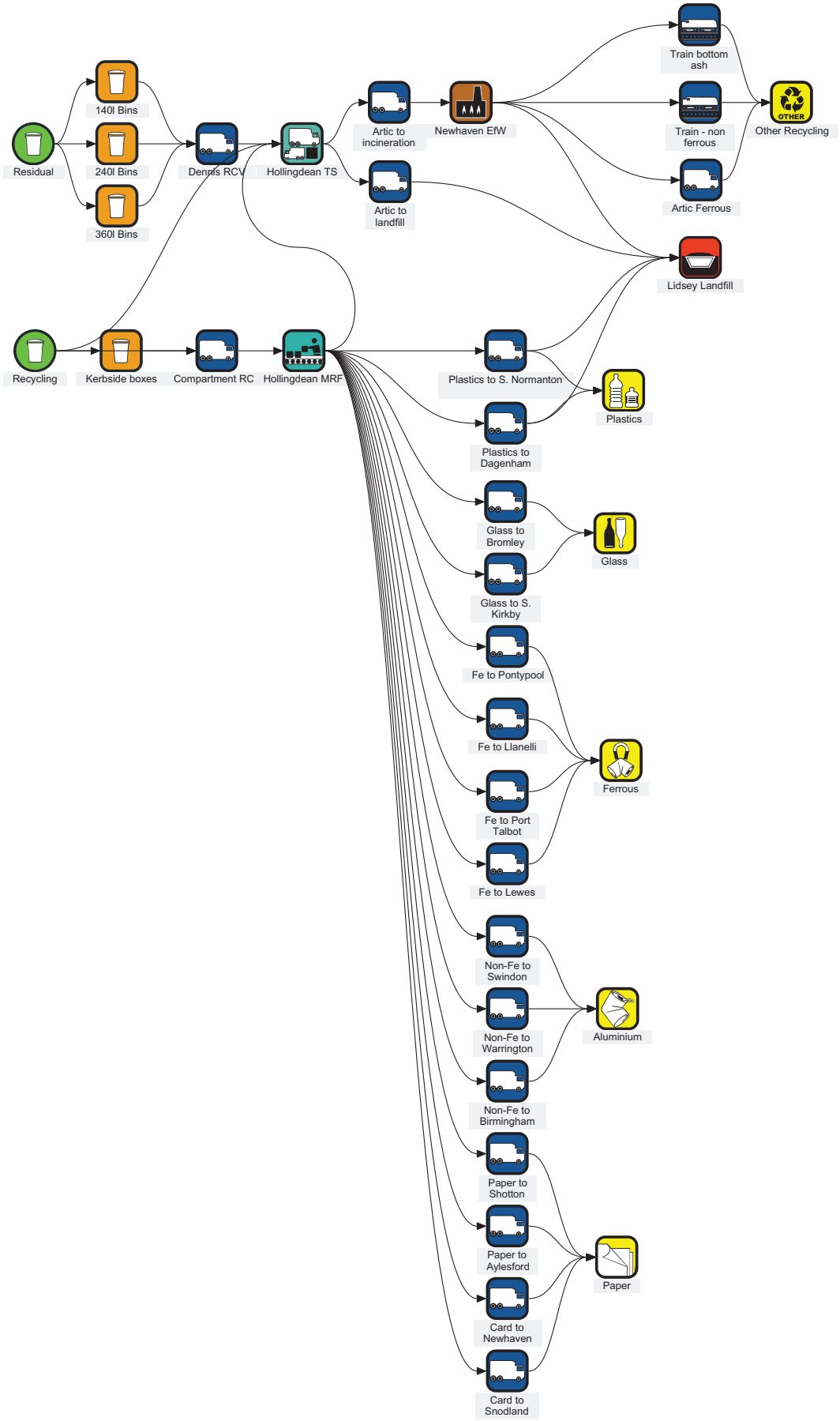
	Human Toxicity (kg 1,4 -DCB - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	43,863	663,853	278,365	-27,700,898	-1,471,718	220,547	**-27,965,988**
AWC AD	47,787	772,039	328,145	-31,843,205	-1,139,935	168,476	**-31,666,693**
AWC IVC	47,787	772,039	328,145	-31,656,906	-1,042,351	168,476	**-31,382,810**

Results of LCA – Human toxicity

	Resource depletion (kg antimony - Eq)						
	Collection	Transportation	Intermediate facilities	Recycling	Treatment & Recovery	Landfill	**Total**
Baseline	2,777	19,701	3,645	-75,655	-150,082	-1,484	**-201,098**
AWC AD	3,482	24,306	3,983	-111,684	-117,549	-1,122	**-198,584**
AWC IVC	3,482	24,306	3,983	-111,939	-113,810	-1,122	**-195,100**

Results of LCA – Resource depletion

Appendix D - Scenario maps



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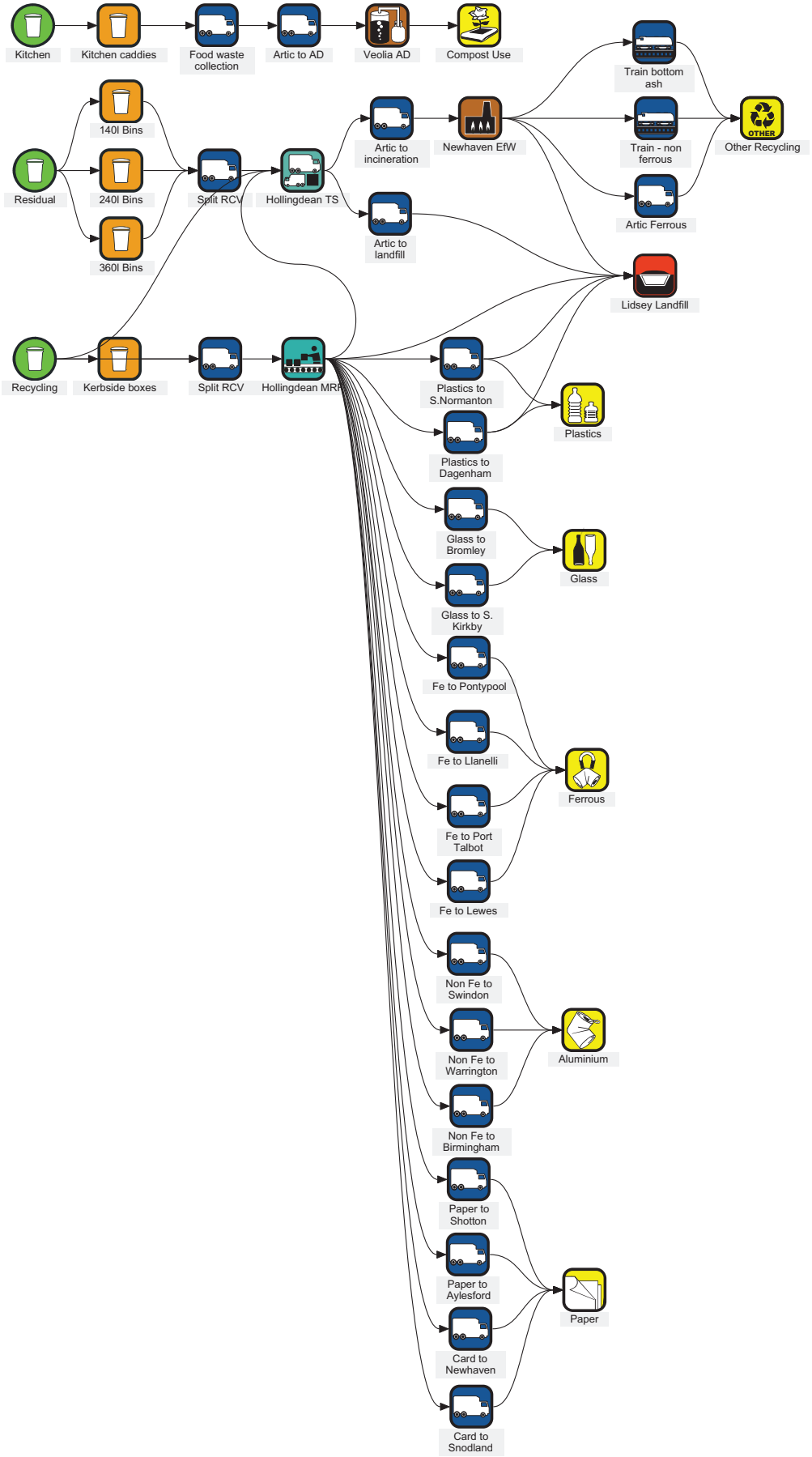

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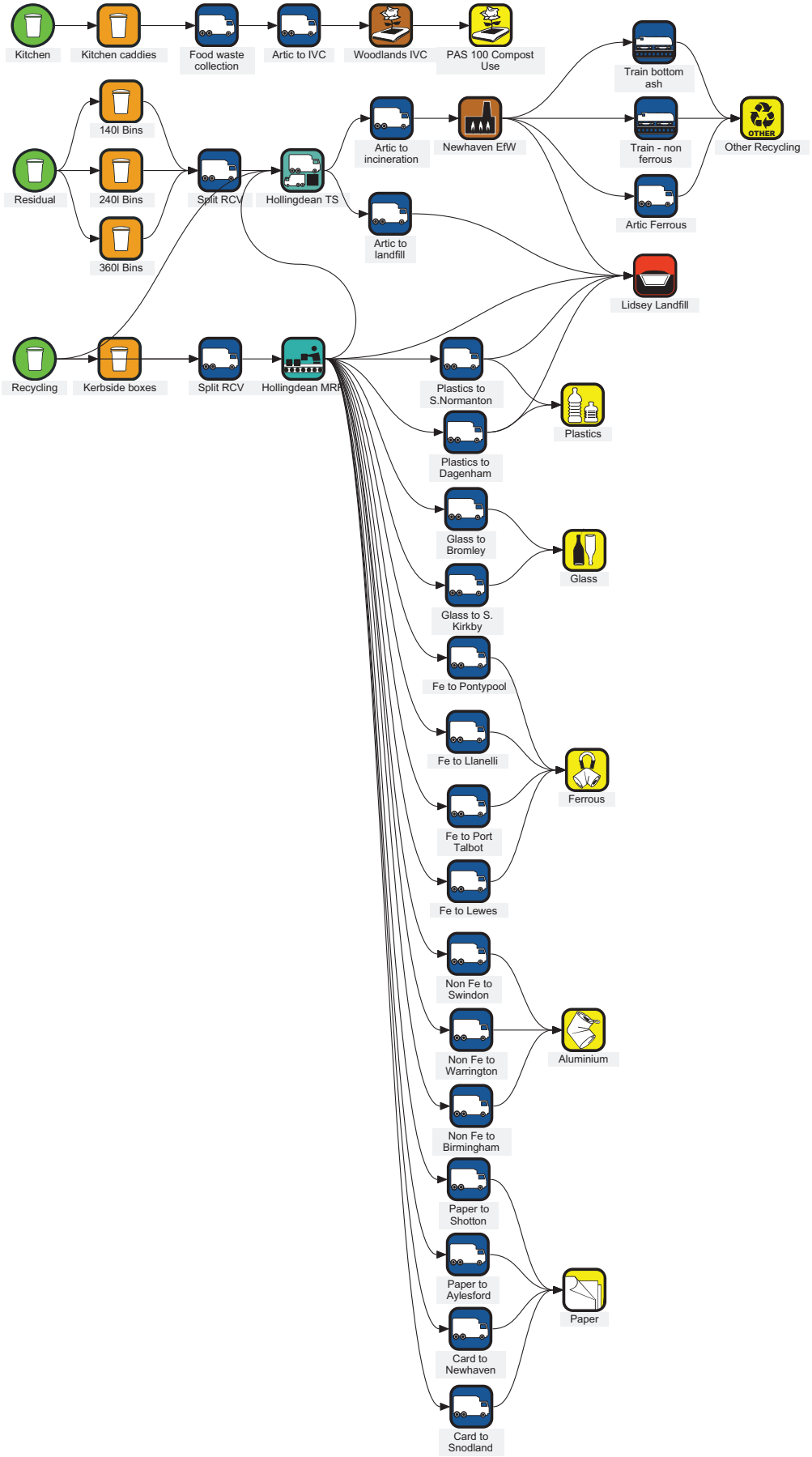

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Database Version and build date: V2.0.1.4_09-04-2010
Last project modification date: 25-10-2011

ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE	**Agenda Item 38** Brighton & Hove City Council

Subject:		**Proposed Submission East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan**	
Date of Meeting:		**23rd January 2012**	
Report of:		**Strategic Director, Place**	
Lead Cabinet Member:		**Councillor Kennedy**	
Contact Officer:	**Name:**	**Mike Holford**	**Tel: 29-2501**
	Email:	**Mike.Holford2501@brighton-hove.gov.uk**	
Key Decision:	**Yes**	**Forward Plan No: 25774**	
Ward(s) affected:		**All**	

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

1.1 This report is to inform Cabinet/Council on the progress of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan. The report also seeks approval to produce a Proposed Submission Waste and Minerals Plan prior to statutory public consultation and subsequent submission to the Secretary of State

1.2 The Waste and Minerals Plan (WMP) will eventually replace much of the Council's adopted Waste Local Plan and Minerals Local Plan. The WMP will provide planning policy for the management of all wastes and the production of all minerals in East Sussex and Brighton & Hove, including that part of the South Downs National Park within East Sussex and Brighton & Hove.

2. RECOMMENDATIONS:

2.1 That ESCOSC be invited to comment and that comments be taken into account at full council (date 26th January 2012)

2.2 That Cabinet is asked to recommend to Council that:-

- The analysis of the response to the consultation on the draft Waste and Minerals Plan be noted;
- The Proposed Submission Waste and Minerals Plan (PSWMP) is agreed and published for statutory public consultation for a six week period commencing on 21 February 2012.

- The document be subsequently submitted to the Secretary of State subject to no material changes, other than alterations for the purposes of clarification, improved accuracy of meaning or typographical corrections, being necessary.

- The Strategic Director, Place be authorised to agree any alterations for the purposes of clarification, improved accuracy of meaning or typographical corrections to the text of the PSWMP with East Sussex County Council and the South Downs National Park Authority prior to consultation.

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

3.1 Following consideration by Cabinet at its meeting on 13 October 2011, a draft Waste and Minerals Plan (WMP) was published for public comment. The main approaches of the draft WMP comprised:

- Reducing the amount of waste produced;
- making provision for increased treatment (e.g. recycling or recovery) of waste including planning for additional capacity for recycling/recovery facilities equivalent to the likely exports of waste for landfill;
- identifying an area of focus for later searches for suitable locations for waste treatment facilities;
- saving allocations for recycling/recovery facilities until the subsequent Sites document has been adopted;
- recognising that the declining amounts of waste still requiring land disposal should utilise existing planning permissions outside the Plan area and therefore the Plan would not include any Areas of Search for landraise or landfill reflecting the Plan's policy steer to minimise the amount of waste sent to landfill or landraise
- safeguarding existing landfill capacity;
- resisting the disposal of residual waste from London in the Plan Area;
- meeting the apportionment for aggregates advised by Government.

3.2. 87 responses (containing around 170 comments) to the draft WMP were received, which is in marked contrast to the nearly 3,000 received to an earlier draft ‘Preferred Strategy’ document (most of these were concerned with future land disposal in the Plan area). The responses generally support the broad thrust of the approaches set out in the draft WMP, with some respondees requesting a strengthening of policy protection in certain areas. Some concerns were raised about the Plan’s approach of relying on other areas for the management of waste by land disposal (see below). A summary of the consultation process and the comments received is set out in Appendix One. All submissions will be made -available on the County Council's website.

3.3 Officer comments from Kent County Council included requesting greater certainty regarding the destination of non-inert and hazardous wastes requiring landfill. Surrey County Council raised a concern that landfill capacity in their area would not last as long as they had forecast if waste was imported and were not convinced that landfill capacity could not be developed. West Sussex County Council noted that there was declining land disposal capacity in their area and it was likely that sites further afield would have to be utilised. However, waste that might be exported to landfill would almost certainly be commercial and industrial, which is not directly managed local authorities but, instead, responds

to market conditions. It is not, therefore, proposed to make any significant changes to the Plan's approach to land disposal although further evidence to support the position has been gathered.

3.4 Several respondees raised concern with the saving of Waste Local Plan (WLP) policy allocating land at Bexhill and Newhaven as suitable for waste management activity. No changes to the Plan are proposed in light of these comments as the matter of deciding on specific sites for future waste development will be properly and thoroughly dealt with as part of the development of the Sites document. This will involve a call for sites and thorough assessment of all possible opportunities taking into account constraints and consultation responses at that time.

3.5 In light of the comments received on the draft WMP no major changes in approach are proposed although the proposed text of the PSWMP has been strengthened (See Appendix 2 draft shortened version less supporting text - Full version is available on the Council's website). Based on evidence, assessments and consultation responses it is considered that the PSWMP represents a 'sound' document. It is therefore, proposed that a six week consultation period takes place between 21 February 2012 and 3 April 2012.

3.6 Subject to there being no further material changes to the Plan in light of comments, the Plan will be submitted to the Secretary of State who will appoint an Inspector for independent examination of the Plan.. The Inspector will be required to test the Plan for compliance with certain statutory provisions, including whether the Plan is "sound". More information on the tests of soundness is included in Appendix Three. Appendix Four sets out a shortened version of the PSWMP.

3.7 In testing the Plan the Planning Inspector will consider the way in which the Plan has been prepared, its content and evidence submitted by the Councils together with representations received as a result of consultation. The Planning Inspector will also hold a public examination and it is anticipated that this will take place in the Autumn 2012. Adoption is then programmed for Early 2013, following which, formal work will commence on identifying specific sites for waste and minerals development required by the WMP.

4. COMMUNITY ENGAGEMENT AND CONSULTATION

4.1 Public consultation took place on the draft Waste and Minerals Plan from 27 October 2011 to 8 December 2011. Consultation on the proposed submission Waste and Minerals Plan will take place between 21 February 2012 and 3 April 2012 if the report recommendations are agreed.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

5.1 The costs of the consultation on the draft Waste and Minerals Plan and of publishing the Proposed Submission Waste and Minerals Plan are being shared proportionally with East Sussex County Council and the South Downs National

Park Authority. The council's share of the costs will be met from within the existing Waste Planning revenue budget.

Finance Officer Consulted: *Name Karen Brookshaw* *Date: 22/12/11*

Legal Implications:

5.2 Once adopted, the Waste and Minerals Plan will be a Development Plan Document ("DPD") within the meaning of the Planning and Compulsory Purchase Act 2004. The detail as to the preparation of this type of document is found in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). Regulation 27 of the 2004 Regulations provides that, prior to submission to the Secretary of State for independent examination, a DPD must be publicised for a period of at least 6 weeks and representations invited. Any representations received by the local planning authority within the timescale set out must be forwarded to the Secretary of State. The consultation proposed by this report will need to comply with the publicity requirements set out in Regulation 27.

It is not considered that any adverse human rights implications arise form this report.

Lawyer Consulted: *Name Hilary Woodward* *Date: 16/12/2011*

Equalities Implications:

5.3 None directly arising from this report.

Sustainability Implications:

5.4 The planning system has a clear purpose to contribute towards the achievement of sustainable development. All planning policy documents will be appraised for their economic, social and environmental impacts. The WMP has been subject to a full Sustainability Appraisal.

Crime & Disorder Implications:

5.5 None specifically arising from this report

Risk and Opportunity Management Implications:

5.6 Risks to the project are regularly reviewed at project meetings. A risk is if the plan were to be found unsound by the Planning Inspector. As outlined in the report this is not considered to be a high risk.

Public Health Implications:

5.7 None arising directly from this report.

Corporate / Citywide Implications:

5.8 It is important that the planning policies are in place to provide a strategy for dealing with waste management and minerals production across Brighton & Hove and East Sussex.

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

6.1 This is the only practicable option if the Waste and Minerals Plan is to progress towards adoption.

7. REASONS FOR REPORT RECOMMENDATIONS

7.1 Approval of Council is required to submit the Waste and Minerals Plan for public examination.

SUPPORTING DOCUMENTATION

Appendices:

1. Summary and analysis of the consultation process and comments received on the draft Waste and Minerals Plan

2. A Proposed Submission Draft Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove (shortened version)

3. Test of Soundness

4. List of Evidence Base Documents

Documents in Members' Rooms

1. None

Background Documents

1. See Appendix 4

Summary and Analysis of the Consultation Process and Comments Received on the draft Waste and Minerals Plan
January 2012

Consultation Period

1.1 The consultation ran for six weeks, between 27 October and 8 December 2011.

How people were notified

1.2 Notification was given by letter and email, with documents made available on the consultation portal and in local libraries or council offices.

- A factsheet was circulated to 20,000 residents in the Low Weald and in Bexhill. Factsheets were also sent to those who had responded to the Preferred Strategy consultation in 2009/2010.

- Notification letters were sent to Parish Councils, District and Borough Councils in the Plan Area, neighbouring County Councils and adjacent authorities.

- All consultees registered on the Objective database were notified by email, one week before the consultation began, as well as on the day the consultation started.

- Neighbouring districts and parish councils were notified by email, as were key members of industry.

- A reminder email was sent to everyone with an email address on the database (approx 1300 people) to let them know there was one week left to comment on the draft Plan.

- Documents were made available at local libraries and District or Borough Council Offices, as well as through the East Sussex County Council website and at http://consult.eastsussex.gov.uk.

Meetings

1.3 Letters to the Parish and Town Councils and Interest Groups included an offer to meet with them, if they felt this would be helpful.

- A stakeholder workshop was held at County Hall on 17th November 2011. This was attended by around twenty representatives from neighbouring counties, parish councils, local interest groups and the waste industry.
- Meetings with held with Newhaven Town Council, Peacehaven Town Councils, Polegate Town Council and a joint meeting of Lewes District Council and Lewes Town Council.
- PAAL (Piltdown Action Against Landraise) requested a meeting, and this was held at County Hall, Lewes.

Summary of Responses

1.4 87 individuals and organisations responded to the consultation, making around 170 comments. Comments were received in relation to Ashdown Brickworks, Pebsham Countryside Park, Newhaven and the Low Weald. There were no comments on Hangleton Bottom, Tutts Barn or Bellbrook. A summary of all responses received can be found below.

1.5 The majority of comments were supportive of the policies within the draft Plan. Particular support was given to

1) The move away from landraise policies (individuals, groups, Parish Councils. Districts and Boroughs);
2) Less reliance on Ashdown Brickworks (individuals, groups, Parish Councils. Districts and Boroughs);
3) The approach to waste management in alignment with the waste hierarchy;
4) The approach to address concerns of local or host communities and requests that this is expanded throughout the Plan.

1.6 The following issues were raised as areas of concern, without objection to policy:

1) Forecasting of waste data relating to evidence other authorities hold;
2) Plan is not aspirational enough in terms of reducing the level of waste produced or the use of technology;
3) Requests from environmental bodies that policies are strengthened to increase protection for the natural environment in terms of biodiversity, soils and water quality;
4) Clarification sought around implications for other forms of development by continued safeguarding of wharves, balanced by concerns from operators for more explicit safeguarding approach;
5) Some concern that Ashdown Brickworks is not totally removed from consideration;
6) Some concern that Pebsham Countryside Park could be affected by continued allocation for waste;
7) Concern about additional waste uses proposed at North Quay, Newhaven
8) Restriction of waste uses within the SDNPA
9) Definition of ‘major’ development in relation to the SDNPA

1.7 In addition to the comments with asked for policy to be clarified, some consultees objected to the following:

1) The references to Ashdown Brickworks;
2) The implications for Pebsham and Pebsham Countryside Park;
3) The waste data forecasts and the implications for neighbouring authorities.

List of respondents

County Councils
Kent, Surrey, West Sussex.

Districts and Borough Councils
Rother, Wealden, Lewes, Eastbourne, Adur, Ashford, Mid-Sussex.

Parish and Town Councils
Brightling, Chalvington with Ripe, Chiddingly, Rotherfield, Newick, Ninfield, Arlington, Ripe, South Heighton, Laughton, Rottingdean, Ickelsham and Winchelsea, Plumpton, Cuckmere Valley, Telscombe, Polegate, Newhaven.

Statutory Consultees
Natural England, Environment Agency, HSE, Coal Authority

Industry and Business
Sovereign Harbour, Mineral Products Association, Southern Water, Dudmans, Positive Energy Sussex, Brett Group, Deanland Wood Park Ltd, Cemex, KTI, Magpie, Grovebridge Farm, Light Bros, Firle Estate, Rabbits, Ibstock (Veolia response to follow).

Interest Groups and
Wealden LSP, Brighton and Hove WAG, Friends of the Earth Brighton, Friends of the Earth Lewes, South Downs Society, CPRE Sussex, BALI, REAL.

Individuals (30)
Residents of the Low Weald, Pebsham and Bexhill.

Contents

Contents

Introduction

What is this document?

This document is a short version of the full Proposed Submission Draft Waste and Minerals Plan.

It sets out the key information contained in the main document.

In the full Proposed Submission Draft Waste and Minerals Plan you can also find extra supporting information and more detail about the policies and background studies that have informed the approaches.

Copies of all the main documents will be available online and at your local council office. Copies of the consultation document will be available at main libraries across East Sussex and Brighton and Hove.

A separate factsheet (Factsheet No.4, February 2012) is also available which further explains the purpose and content of this document.

What is the Waste and Minerals Plan?

The Waste and Minerals Plan will set out the strategic policy decisions for waste and minerals in the Plan Area.

Existing waste and minerals planning policy is contained in the adopted East Sussex and Brighton & Hove Waste Local Plan (2006), and Minerals Local Plan (1999). The policies from both have been 'saved' which means they will remain in force until replaced by policies in the new Waste and Minerals Development Framework.

The Waste and Minerals Development Framework will be made up of:

- The Plan;
- A waste sites document; and
- A minerals sites document.

Document Guide

Introduction

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Overarching policies	Policies that apply to waste and minerals development as well as development determined by other planning authorities	40
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Key Diagram	Minerals Key Diagram. Waste Key Diagram.
Glossary	Technical words used in the document

Key dates for the Waste & Minerals Plan

The table below provides the dates of previous consultations and summarises the current timetable for key stages of the Plan. Once the Plan has been adopted, work will commence on the sites documents.

Key dates for the Waste & Minerals Plan

Stage	Date
Preferred Strategy consultation	21 October 2009 to 25 January 2010
Draft Plan consultation	27 October 2011 to 8 December 2011
Formal ('Regulation 27') consultation on the soundness of the Plan	22 February 2012 to 4 April 2012
Submission of the Plan to Government	Summer 2012
Public Examination	Autumn 2012
Adoption	January 2013

This is the opportunity to formally submit any representations on the soundness of the Submission document. Any comments will be taken into account by the independent Planning Inspector as part of the Examination which is anticipated to be held in Autumn 2012. The

examination is an independent assessment to ensure that the Plan satisfies the requirements of regulations and legislation, and is 'sound'. Please see our guide to making a representation which is available on the following website: TBC.

Information Papers

The Plan is supported by ten Information Papers which provide explanatory information related to the key issues addressed, and are signposted at appropriate point in this document. These are:

Information Paper 1 -	The Future Need for Waste Management
Information Paper 2 -	The Future Need for Minerals Production and Management
Information Paper 3 -	Sustainable Waste Management
Information Paper 4 -	Waste Management Methods and Technologies
Information Paper 5 -	Land Disposal
Information Paper 6 -	Spatial Portrait of East Sussex, Brighton & Hove and the South Downs
Information Paper 7 -	Hazardous and Radioactive Waste
Information Paper 8 -	Transportation of Waste and Minerals
Information Paper 9 -	Climate Change and Waste and Minerals
Information Paper 10 -	Waste Water and Sewage Sludge

Introduction

How do I submit representations on the soundness of the the Plan?

This is the formal stage of registering representations about the soundness of the Plan.

All representations must be received by midnight on 4 April 2012 to ensure that they can be taken into account by the Planning Inspectorate. Your comments will made available to view, so please do not include any information that you consider to be confidential. We will hold your name, address and contact details for use in future waste and minerals consultations.

On-line Submission of Representations

We strongly encourage you to view the document and send in your representations online, via the website http://consult.eastsussex.gov.uk, as this will help make significant savings of resources and paper.

Anyone can view the documents online, but to submit representations you will need to register at http://consult.eastsussex.gov.uk. Please contact us if you have any difficulty with the website.

Other ways to send us your representations:

By email	wasteandmineralsdf@eastsussex.gov.uk
By post	Economy, Transport & Environment, East Sussex County Council, C4 Waste and Minerals Policy (AP), FREEPOST (LW43), Lewes, BN7 1BR

For general queries you can contact:

East Sussex County Council	**Tel:** 01273 481846
Brighton & Hove City Council	**Tel:** 01273 292505

Context 1

Waste & Minerals Context

Waste and Minerals: What are they?

1.1 **Waste** or 'rubbish' is generally defined as materials and goods we discard because we no longer want or need them. Many different types of solid and liquid waste are produced in the Plan Area and the Plan applies to them all.

1.2 **Minerals** are natural substances including metals, rocks, and hydrocarbons (solid and liquid) that are extracted from the earth by mining, quarrying and pumping. They are used in a wide range of applications related to construction, manufacturing, agriculture and energy supply. Mineral resources that may be available in the Plan Area in workable quantities include sand and gravel, chalk, clay, gypsum, and searches have been undertaken for oil and gas.

Waste in the Plan Area

1.3 Around 1.75 million tonnes of solid waste are handled in the Plan Area each year. The main types are:

- ***Municipal Solid Waste (MSW)*** is taken in this Plan to mean waste that is collected by local authorities. Generally it is from households (from doorstep collections and Household Waste Recycling Sites), from street cleansing, and from public parks and gardens[(1)]. The current production of over 365,000 tonnes per annum makes up about 21% of all wastes in the Plan Area.
- ***Commercial and Industrial Waste (C&I)*** from shops, food outlets, businesses, and manufacturing activities makes up about 27% of wastes in the Plan Area. It is difficult to get an accurate picture of how much C&I waste is produced because there are no requirements on producers of this waste to submit data for statistical purposes. It is estimated that around 475,000 tonnes of C&I waste was produced in 2008/9.
- ***Construction, Demolition and Excavation Waste (CDEW)*** is produced from building activity. The amount that arises fluctuates considerably due to economic and social factors, with increases during periods of high development and construction. An accurate figure for arisings is difficult to obtain and best estimates suggest that around 906,000 tonnes was produced in 2008/9.
- ***Other wastes*** include hazardous waste (around 19,000 tonnes per year), low level radioactive waste, liquid waste (other than wastewater), and wastes arising from the agricultural sector. Hazardous waste makes up approximately 1% of the total waste stream and altogether these wastes make up only a small proportion of the wastes generated in the Plan Area, although they still need to be planned for and usually require specialist treatment facilities with even tighter environmental controls.

1.4 As well as solid waste, the Plan is concerned with the management of wastewater, which comprises the water and solids that flow to a waste water treatment works operated by a water company. There are 32 waste water treatment works within the Plan Area treating 60 million cubic metres of waste water each year.

1 Due to the wider EU Waste Framework Directive definition of MSW, a new definition has been brought into use in England which relates to the waste previously recorded as Municipal Solid Waste and this is 'Local Authority Collected Waste'. However for reasons of comparability and consistency with previous documents the term Municipal Solid Waste will continue to be used in this Plan.

1 Context

Existing Waste Management in the Plan Area

1.5 Although progress has been made towards more sustainable management of waste, in particular with the recent development of new facilities for managing MSW by recycling, composting and energy recovery, a significant proportion of solid waste produced by businesses and industry is still landfilled. This is unsustainable. Landfilling waste prevents it from being used as a resource (e.g. as a raw material produced from a recycling process); it is likely to be the least environmentally acceptable waste management option and landfill costs are rising steeply.

Minerals in the Plan Area

Aggregates

1.6 Aggregates (sand, gravel, and crushed rock) are important for the improvement of infrastructure and buildings.

1.7 Historically there has been low levels of extraction of 'land-won' sand and gravel in East Sussex, and imports of aggregates dredged from the seabed (known as marine aggregates) and crushed rock have been important in meeting local construction needs. Whilst there are several permitted sites for land-won aggregates, there is currently only one site producing building sand and it is located in an area now within the South Downs National Park[(2)].

Chalk

1.8 There are no active chalk quarries in East Sussex. Chalk for agricultural use has recently been supplied by imports.

Clay

1.9 Clay is extracted in East Sussex for brick and tile manufacture, and also more recently for flood defences. There are currently four active sites, at Aldershaw Farm, Sedlescombe near Battle; Chailey Brickworks; Hastings Brickworks; and Ashdown Brickworks. There is also an existing planning permission for a new brick works and clay pit at Horam, as well as several dormant and inactive sites in East Sussex.

Gypsum

1.10 Gypsum is an important raw material for the construction industry, and is used in plaster and plasterboard, cement and other industrial processes. The resource near Robertsbridge in East Sussex is the largest deposit in the UK. Desulphogypsum (DSG), a by-product from coal fired power stations, can be used as an alternative to gypsum and has been used at the plasterboard plant.

Oil and gas

1.11 Exploration for oil and gas took place in East Sussex in the 1980s although no commercially viable resources were found. There is currently no exploitation of oil or gas in the Plan Area although there are several licences for exploration.

2 See Information Paper 2

Recycled and Secondary Aggregates

1.12 Supplies of land-won aggregates in the Plan Area are augmented by secondary aggregates and recycled materials alongside marine imports. In 2007 there were thirteen sites in the Plan Area which recycled aggregates, producing about 370,000 tonnes of recycled aggregates. It is anticipated that this pattern will continue to increase in accordance with national policies to increase their use.

Wharves and Railheads

1.13 Marine aggregates are imported through the ports of Newhaven, Rye and Shoreham. The capacity for receiving and processing marine-dredged and other aggregates through the three ports is over 3 million tonnes per annum (mtpa)[3] but actual throughput has been much lower.

1.14 Bottom ash produced by the Newhaven Energy Recovery Facility is transported by rail to a processing facility in Brentford, west London.

1.15 The only rail movement of minerals is DSG to the processing facility at Robertsbridge.

Further information in the full consultation document

1.16 In the full draft Waste and Minerals Plan you can also find further detail about the policy context, overview of waste and minerals in the Plan Area, and of the characteristics of the Plan Area.

3 SEERA Aggregates Monitoring Report 2005

2 Overarching Strategy

Vision

Vision for the Plan Area to 2030

By 2030 the environmental footprint, in particular greenhouse gas emissions, associated with the production and management of waste and minerals in the Plan Area will have been significantly reduced.

Reductions in waste arisings will have occurred and the efficient production and use of materials will have been maximised. Most waste will be reused, recycled to provide goods or raw materials, or processed to provide energy (heat or power), with as little as possible being disposed of because it is the least sustainable option and because the environmental characteristics of the Plan Area mean that opportunities for disposal to land are severely restricted.

Facilities needed to manage waste and produce minerals will be designed, located, and operated to ensure that the area's built and natural heritage are preserved and even enhanced - from its exceptional countryside, which includes part of the South Downs National Park, the Heritage Coast, the High Weald AONB including Ashdown Forest, the Low Weald, and the Levels at Pevensey and Rye, to its distinctive and varied built environment which includes seaside towns and a city with grand Regency architecture as well as scattered Weald and downland villages.

The production of secondary materials will be maximised but where primary minerals are essential to meet the need for new development, both locally and the needs of the wider South-East region, the extraction and use of aggregates, clay, chalk, and gypsum, will take place in an efficient manner that protects the environment and local communities.

New planning applications for waste or minerals development will take into account concerns and interests of host communities, and seek to capture benefits for the local community.

Objectives

Strategic Objectives

SO1: To achieve declining rates of growth of all wastes, to reduce the amount of waste produced, and to drive the management of waste up the hierarchy by reusing and recycling waste material into new products and recovering energy from materials that cannot effectively be recycled.

Relevant policies and delivery strategy: WMP 2, 2a, 2b, 2c, 2d, 3, 4a, 4b, 5, 6a, 6b

SO2: To achieve prudent and efficient use of minerals, having regard to the market demand and supply restrictions in the Plan Area, and to recognise waste as a resource in order to reduce local demands on water, energy, land, and primary raw materials including soil and minerals.

Relevant policies and delivery strategy: WMP 1, 2c, 2d, 3, 10, 11, 12, 13, 14, 15, 18, 22a, 22b, 23a, 23b, 25, 26, 27b

SO3: To make timely provision for sufficient facilities for the sustainable management of waste (including waste water) and production of minerals to meet forecast requirements for the Plan Area, in order to contribute as far as practicable to regional and national requirements for waste management and support the production of nationally and regionally important minerals.

Relevant policies and delivery strategy: WMP 2, 2a, 2b, 3, 8a, 8b, 9, 10, 11, 12, 13, 14, 15, 20, 21

SO4: To protect and enhance the environment, communities and human health through minimising harmful emissions to air (including greenhouse gases), water and land; minimising the use of natural resources (including greenfield sites); minimising impacts on protected habitats, designated landscapes, geological sites and heritage sites; and areas which have landscape character and quality which is sensitive to development including the South Downs National Park; and through ensuring high quality mitigation, compensation and restoration to appropriate after-uses. Account will be taken of local landscape character and distinctiveness.

Relevant policies and delivery strategy: WMP 1, 6a, 6b, 16, 17, 18, 19, 22a, 22b, 24, 25, 26, 27a, 27b

SO5: To manage waste and minerals at an appropriate scale, taking account of the distribution of waste sources and the limitations on the availability of suitable land in the Plan Area, as close to the sources as practicable in order to encourage communities to take more responsibility for the waste they create and to minimise the transport of waste and minerals *whilst still moving up the waste hierarchy*. Use the most sustainable and practicable mode where it is necessary to transport waste or minerals.

Relevant policies and delivery strategy: WMP 2e, 4a, 4b, 7, 17, 18, 20, 21, 25

2 Overarching Strategy

SO6: To ensure that sustainable waste management objectives are considered in all plans, strategies and proposals in the Plan Area, and that the design, construction and operation of all new development promotes sustainable waste management.

Relevant policies and delivery strategy: WMP 2a, 2d, 20

SO7: In recognition of limited capacity for disposal to land in the Plan Area, to dispose of waste to land as a last resort and seek appropriate after-use of land disposal sites to achieve conservation and enhancement of the environment.

Relevant policies and delivery strategy: WMP 2, 2b, 4a, 4b, 7, 7a, 7b, 7c, 16

SO8: To ensure facilities are designed, located and operated in a manner that takes the implications of climate change, and in particular rising sea levels, into account.

Relevant policies and delivery strategy: WMP 6a, 6b, 23a, 27a

Overarching Strategy 2

Local Strategy Statement- Approach to Key 'Larger than Local' Matters

2.1 Waste and mineral planning authorities in preparing their plans are very conscious of the need to address the implications of their proposals on their neighbours in the wider area. Waste and mineral planning authorities are also further motivated to address these issues in order to have a coherent approach if the current regional plan framework were to be removed.

2.2 Additionally, the trend in waste management and the production of minerals is to cater for markets that cross administrative boundaries, and in the case of certain waste activities deal with waste over considerable distances.

2.3 The Local Strategy Statement is intended to give guidance on how the Authorities have approached 'larger than local' issues. There is an intention to gain consensus with our neighbouring authorities on the Statement.

2.4 The key matters to be considered have been identified as follows:

Waste

1. Provision of waste management capacity requirements;
2. MSW recycling targets;
3. Sub-regional self-sufficiency - land disposal outside the Plan Area
4. London's waste;
5. Strategic management of hazardous waste.

Minerals

1. Provision and use of aggregates (sharp sand and gravel, and soft sand).

2.5 The proposed actions to address these matters are set out in the full Proposed Submission Draft Waste and Minerals Plan.

2 Overarching Strategy

Minerals and waste development affecting the South Downs National Park (WMP1)

Purpose of Policy WMP 1

To ensure development is sustainable and appropriate to the purposes and duties of the South Downs National Park Authority.

Policy WMP 1

Minerals and waste development affecting the South Downs National Park

a) Minerals and waste development in the South Downs National Park should demonstrate that it contributes to the sustainable development of the area.

b) Major minerals and waste development in the South Downs National Park should not take place except in exceptional circumstances, where it can be demonstrated to be in the public interest[4]. In this respect, consideration will be given to:

i. the need for the development, including in terms of any national considerations; and
ii. the impact of permitting or refusing the development upon the local economy; and
iii. the cost of and scope for developing outside the designated area or meeting the need in another way; and
iv. any detrimental effect on the environment, landscape and/or recreational opportunities and the extent to which it could be satisfactorily mitigated.

Development will only be in the public interest if the outcomes of i-iv above gives sufficient reason/s to override the potential damage to the natural beauty, cultural heritage, wildlife or quiet enjoyment of the National Park.

c) Extensions to existing soft sand quarries or new quarry proposals in the National Park need to conform with (b) above and additionally demonstrate that the need could not be practically achieved by extraction in adjoining Counties.

d) Small-scale waste management facilities for local needs should not be precluded from the National Park and should meet the requirements of Policy WMP 6a.

4 In the case of minerals and waste proposals, all applications are defined by the Town and Country Planning (Development Management Procedure) Order 2010 as 'major'. However, for the purpose of this policy, major minerals and waste development is development that by reason of its scale, character or nature, has the potential to have a serious adverse impact on the natural beauty, wildlife, cultural heritage and recreational opportunities provided by the South Downs National Park. The potential for significant impacts on the National Park will be dependent on the individual characteristics of each case.

e) Proposals for the backfilling of redundant quarries within the National Park need to conform with (b) above and additionally demonstrate net long term benefits to the National Park and that they meet Policy WMP 7b criteria (a) to (e).

Implementing the Waste Hierarchy (WMP2a-2e)

2.6 This Plan proposes that the waste hierarchy is implemented in a number of key ways which are set out in policies below and summarised as follows:

1. Providing support for strategies and activities which seek to minimise waste or prevent it from occurring (Policies WMP 2a and 2d);
2. providing overarching support for businesses and activities which involve the re-use of materials or utilise materials which have been derived from waste (Policy WMP 2a);
3. setting minimum targets for recycling and recovering waste (Policy WMP 2b);
4. quantifying the need for the development of additional recycling and recovery infrastructure (Policy WMP 4);
5. encouraging the inclusion of recycling infrastructure in new developments (Policy WMP 2e);
6. promoting the capture and use of waste as a resource in the form of materials and energy (Policies WMP 2b and 2d); and,
7. keeping the requirements for the disposal of waste to a minimum and placing strict constraints on the development of new land disposal capacity (Policies WMP 2b, 7a and 7b).

Purpose of Policy WMP 2a

To prevent waste occurring in order to reduce the amount of waste treatment capacity needed. To provide commitment to contributing to wider strategies about waste awareness and sustainable resource use.

To facilitate movement to the upper tiers in the waste hierarchy, and particularly to increase preparation for re-use, which will involve industries and developments beyond waste management facilities.

For development management authorities, this policy provides a clear framework for ensuring that sustainable waste management is taken into account in planning decisions about non-waste developments.

2 Overarching Strategy

Policy WMP 2a

Promoting Waste Prevention, Re-use and Waste Awareness

To maximise waste prevention and re-use, the authorities will work with stakeholders and delivery partners to:

a. promote strategies for waste prevention, re-use and waste awareness;
b. develop more detailed action plans and policies;
c. encourage developments that involve the preparation of materials for re-use.

Support will be given to non-waste management developments which involve the utilisation of materials, or energy, derived from waste as a resource.

Policy WMP 2a

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Support will be given to non-waste management developments which involve the utilisation of materials, or energy, derived from waste as a resource.

Purpose of Policy WMP 2b

To encourage the development of new waste recycling and recovery infrastructure which ensures waste which has been produced is managed as far up the waste hierarchy as possible and in a manner which minimises the production of greenhouse gases.

Policy WMP 2b

Turning Waste into a Resource

Development proposals should demonstrate that they will contribute to the implementation of the waste hierarchy by indicating how the waste could be managed in the priority order of the hierarchy.

Overarching Strategy 2

Proposals for the management of waste shall be permitted which are able to demonstrate the following:

1. That:

- the waste to be managed cannot reasonably be manages by a process which is further up the waste hierarchy; and,
- the proposed process is an option which delivers the best overall environmental outcome;

And,

2. The operation of the facility will:

- contribute to meeting or exceeding the targets set out in Tables 3, 4 and 5; and,
- not displace the management of waste which is already managed, or likely to be managed, by a process which is further up the waste hierarchy than that being proposed, unless the proposal would result in fewer greenhouse gas emissions overall;

All proposals shall be considered in the context of the generic development management policies of this Plan and the wider Development Plan for the Plan Area.

2.7 Consideration will be given to preparing guidance for developers which sets out how this policy will be implemented.

2.8 Municipal Solid Waste[5] Targets

Table 3 Targets for the Management of Household Waste in the Plan Area

Year[1]	*Recycling*[2]	*Overall Recovery*[3]
2015/16	45%	98%
2020/21	50%	98%
2025/26	55%	98%

1. Targets shall apply to the average achieved during the target year.
2. Recycling includes composting.
3. Overall recovery target is the total percentage of waste diverted away from land disposal and includes re-use, recycling and composting.

2.9 Commercial and Industrial Waste Targets[6]

Table 4 Targets for the Management of C&I Waste in the Plan Area

Year	Recycling	Overall Recovery

5 Taken to mean waste that is collected by, or on behalf of, a local authority, from households, public parks and gardens and street cleansing; or waste delivered by households to household waste sites.

6 Commercial and Industrial waste is waste collected from businesses and establishments and includes that collected from businesses and establishments by local authorities.

2 Overarching Strategy

2015/16	70%	95%
2020/21	70%	98%
2025/26	70%	98%

2.10 Construction, Demolition and Excavation Waste Targets

Table 5 Targets for the Management of CDEW in the Plan Area

Year	Recycling	Overall Recovery
2015/16	50%	98%
2020/21	50%	98%
2025/26	50%	98%

Purpose of Policy WMP 2c

To recognise that energy recovery is lower in the waste hierarchy than other processes so proposals will need to be justified accordingly, and ensure that where energy recovery does take place, the capture of heat and/or energy from those processes should be in the most sustainable and efficient manner possible. This includes taking into account the EU Waste Framework Directive as well as Government policy about increasing use of renewable energy and decentralised power sources, and more broadly about mitigating against climate change.

Policy WMP 2c

Production of Energy from Waste

Proposals for waste management facilities primarily intended to recover energy from waste will only be permitted if it can be demonstrated that appropriate capture of energy will take place in accordance with the EU Waste Framework Directive.

Applicants should demonstrate that the feasibility of recovering heat for local use has been thoroughly considered and, where appropriate, methods for doing so have been incorporated into the development.

Proposals should set out how they contribute to the supply of renewable, decentralised, or low carbon energy sources, and the Government objectives of contributing to the EU2020 renewable energy target.

Purpose of Policy WMP 2d

To ensure that the waste hierarchy is taken into account during construction and demolition activities associated with all new development which require planning permission (not just those that involve the management of waste).

To encourage architects, project funders, and contractors to minimise waste through the life-cycle of a project by 'designing out waste'.

It is envisaged that this policy will be implemented by all planning authorities in the Plan Area.

Policy WMP 2d

Minimising and Managing Waste During Construction, Demolition and Excavation

When assessing development proposals, all planning authorities will consider how the applicant proposes to minimise the waste arising from construction, demolition and excavation works in order to maximise the sustainable management of waste and in particular, to minimise the need for landfill capacity.

All development proposals will be expected to:

a. Demonstrate how the durability of the construction has been maximised[7];
b. minimise the waste arising from construction, demolition and excavation activities;
c. move the management of CDEW waste as far up the waste hierarchy as practicable;
d. take account of relevant legislation, the guidance within the Construction & Demolition Waste SPD (including any subsequent updates); and
e. demonstrate how they will monitor progress within the lifetime of the construction phase of the development.

Temporary waste facilities on construction sites:

Major construction sites or development areas (such as housing developments) should provide temporary waste management facilities to separate and where appropriate recycle Construction, Demolition and Excavation Waste.

Where space on site allows, development should be phased to encourage re-use of recycled material and also to minimise the transport of waste materials from the site and the import of new materials. Temporary screening banks may be needed around any onsite processing facility to minimise the impacts on adjoining areas and on completed parts of the development. Where these are to be retained as permanent features they must be designed to conserve and enhance local landscape character.

7 E.g. Through use of durable materials which minimise requirements for refurbishment and extend the life of the development

2 Overarching Strategy

Purpose of Policy WMP 2e

To ensure that new developments take place in a manner which allows for the convenient sustainable management of waste. For example the policy will ensure that, where appropriate, space is made available for the storage and collection of separated recyclable materials e.g. bring banks.

It is envisaged that this policy will be implemented by all planning authorities in the Plan Area.

Policy WMP 2e

Waste Management in New Development

Proposals for new developments (housing, retail, commercial and industrial uses) should identify the location and provision of facilities and infrastructure intended to allow for the efficient management of waste within the overall site plan. This includes provision for waste collection and separation (including communal facilities), and for allowing proper manoeuvring of waste collection vehicles.

All new development proposals should facilitate the convenient separation and collection of household and business waste, as appropriate; as well as ensuring ease of access for waste collection.

Sustainable Provision and Use of Minerals (WMP3)

Purpose of Policy WMP 3

To deliver the sustainable use and production of minerals using the minerals hierarchy, for example by promoting secondary and recycled materials.

Policy WMP 3

Sustainable Provision and Use of Minerals in the Plan Area

Proposals for minerals development shall be assessed against the following overarching principles in terms of the contribution they make to sustainable provision and use of minerals in the Plan Area:

a. To make provision for a steady supply of minerals in accordance with national policies;

Overarching Strategy 2

b. To support development that produces secondary materials (that can be used as an alternative to primary materials) and/or utilises reused or recycled materials;

c. Allowing primary mineral production only where it is demonstrated the need cannot be met by sources of alternative materials, and that there is evidence of viable resources; and

d. Only allocating further mineral resources if needed to meet our agreed share of national requirements unless material considerations indicate otherwise.

3 Providing for Waste

Provision of Built Waste Facilities (WMP4)

Purpose of Policy WMP 4

To identify the future need for recycling and recovery facilities, and avoid any adverse effects over-provision of capacity could bring.

To provide flexibility in the Plan to demonstrate 'net self sufficiency' by allowing for additional recovery capacity of an amount equivalent to that amount that is identified as needing to be exported for disposal to land.

Table 6 Estimated Quantity of Waste to be Managed in the Plan Area (tonnes)

	2015/16		2020/21		2025/26	
	Min	*Max*	*Min*	*Max*	*Min*	*Max*
MSW	361,000	392,000	356,000	414,000	352,000	437,000
C&I	429,000	478,000	420,000	481,000	412,000	483,000
CDEW	853,000	879,000	832,000	924,000	811,000	971,000

3.1 Similar figures are anticipated in the years immediately after 2025/26.

3.2 The projected capacity gap for recycling and recovery including the allowance equivalent to that exported to landfill indicates:

- That based on the expected requirement to meet Plan targets, the recycling capacity by 2026/27 could be between 30,000 and 170,000 tonnes per annum. and
- demand for recovery capacity is in excess of existing capacity and this is likely to continue throughout the Plan period. The recovery capacity demand will reduce once the Newhaven ERF becomes fully operational, however a capacity deficit will still exist of between 60,000 and 220,000 tonnes per annum.

3.3 In addition the data modelling[8] suggests that there is currently sufficient capacity for bulk metal recycling and inert CDEW recycling during the Plan period.

8 Review of Future Waste Management Requirements, AEA, October 2011

Policy WMP 4

Provision of Built Waste Facilities to Ensure Net Self-Sufficiency

Provision will be made for a sustainable network of waste recycling, composting and other recovery facilities in the Plan Area sufficient to at least meet the indicative waste management capacities set out in the following tables, which includes an amount equivalent to the requirement for land disposal capacity beyond the Plan Area.

	Recycling[9] and composting capacity (tonnes per annum)	
Year	Minimum	Maximum
2015/16	0	80,000
2020/21	0	120,000
2026/27	30,000	170,000

The development of further recycling capacity above that shown in the table above will reduce the need for additional other recovery capacity and may be needed for market reasons. The development of recycling capacity in preference to other recovery capacity will be permitted in accordance with Policy WMP 2b.

	Other Recovery capacity (tonnes per annum)	
Year	Minimum	Maximum
2015/16	60,000	200,000
2020/21	80,000	220,000
2026/27	60,000	220,000

Applications for additional recovery capacity, above that shown in the table above, would need to demonstrate that the proposal reduced disposal to land requirements.

3.4 Similar provision would be needed in the years immediately after 2026/27. Capacity requirements will be monitored in the Authorities Monitoring Reports. An indication of the additional number of strategic facilities needed to meet the above shortfalls is shown in Table 8.

9 Recycling capacity does not include transfer capacity where unsorted materials are simply bulked up or capacity for recycling of bulk metals

3 Providing for Waste

Potential Number of Facilities

Table 8 Potential Number of Facilities

	Recycling and Composting		Recovery	
	Small	Large	Small	Large
2015/16	0/5	0/1	1/4	1/2
2020/21	0/8	0/2	2/4	1/2
2026/27	2/11	1/3	1/4	1/2

Overarching Strategy for Built Waste Facilities

The proposed overarching strategy for provision of built waste facilities in the Plan Area is as follows:

1. Safeguard capacity at existing waste facilities as appropriate (see Policy WMP 5)

2. Allow for appropriate expansion and alteration of existing facilities (see Policy WMP 21)

3. Identify broad areas of focus for recycling and recovery facilities within which a network of sites will be identified in the Waste Sites DPD. The areas of focus reflect proximity to waste arisings, accessibility to A class roads and railways, and exclude flood risk areas and valued environments (see Sustainable Locations for Waste Development and Policies WMP 6a and WMP 6b, and the Waste Key Diagram)

4. Continue to save the following Waste Local Plan policies (and the issues and constraints included on the associated inset plans):

- WLP7 Site Specific Allocation for Road to Rail Transfers, which identifies Sackville Coalyard, Hove;
- WLP8 Site Specific Allocations for Material Recovery Facilities/Waste Transfer Stations, which identifies sites at:
    - Hangleton Bottom
    - Hollingdean Depot (this area has been partially developed for a MRF and WTS)
    - Bellbrook Industrial Estate
    - Land at Tutts Barn
    - Pebsham WDF
- WLP9 Site Specific Allocation for Energy from Waste and Materials Recovery Facilities, which identifies North Quay (this area has been partially developed for an Energy Recovery Facility)

Safeguarding Waste Sites (WMP5)

Purpose of Policy WMP 5

To safeguard existing waste management facilities as appropriate.

To safeguard certain areas in order to support the delivery of waste management facilities in the most appropriate locations.

To safeguard Waste Local Plan site-specific allocations for waste management facilities.

Policy WMP 5

Safeguarding Waste Sites

To ensure waste management capacity in the Plan Area is maintained and enhanced, waste management sites as described below will be safeguarded unless it is demonstrated that alternative capacity is permitted and delivered elsewhere within the Plan Area, or unless it is demonstrated that the waste management provision is no longer needed to meet either local or strategic needs:

a. Existing waste management sites (waste facilities plus supporting infrastructure) with permanent planning permission;

b. Sites that have planning permission for waste management use but have not yet been developed for that purpose;

c. Sites allocated for waste uses in any development plan document except as indicated in section 9.

Development proposals which would prevent or prejudice those sites for waste management uses will be resisted.

Waste Consultation Areas[10] will be identified in the Waste Sites DPD to help ensure that existing and allocated sites for strategic waste management facilities are protected from development that would prejudice an existing or future waste management use.

10 Waste Consultation Areas are intended to be a tool for use by Planning Authorities in considering development proposals that could prejudice an existing or allocated waste management site. WCAs will normally include a distance of 250 metres around any such site.

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Sustainable Locations for Waste Development (WMP6a,6b)

Purpose of Policy WMP 6

To identify broad areas (Areas of Focus) within the Plan Area within which the best opportunities for locating waste recycling and recovery facilities are more likely to be found.

The Areas of Focus identified in this policy, and shown on the Waste Key Diagram, will guide preparation of the Waste Sites DPD.

Policy WMP 6a

Sustainable Locations for Waste Development (excluding land disposal)

Sites for additional waste recycling and recovery facilities, whether new developments or extensions to operations on existing sites, should be sought within the broad Areas of Focus indicated on the Key Diagram inset plan. The sites identified in the Waste Sites DPD will also conform to the strategy set out here.

Proposals should demonstrate how they will balance the need to be located close to waste arisings, moving waste management up the waste hierarchy, and minimising adverse impacts on communities and the environment.

Proposals for development will only be considered outside of the Areas of Focus if it can be demonstrated that:

a. There are no suitable sites available within the Areas of Focus to meet identified needs, or they are small-scale facilities predominantly to meet smaller, more localised needs only[11]; and
b. The development will contribute to moving waste management up the waste hierarchy and minimising greenhouse gas emissions; and
c. They are well related to the relevant main treatment facilities within the Plan Area.

The South Downs National Park and the High Weald Area of Outstanding Natural Beauty

Small-scale facilities should not be precluded from the SDNP and High Weald Area of Outstanding Natural Beauty where the development is for local needs[12] and where it would not compromise the objectives of the designation.

11 Smaller, localised facilities can be essential in helping to provide local solutions for collecting, sorting, bulking, and transferring and treating wastes in complementing the waste treatment provided at more strategic larger-scale facilities.

12 Smaller, localised, facilities are generally considered to include: local recycling facilities e.g. businesses collecting, storing, sorting and bulking waste materials prior to their transfer to waste processing sites; local scale materials recycling facilities which collect, sort, and bulk recyclable materials prior to transfer; waste transfer stations where waste is bulked up and transferred in larger loads to a waste recovery or disposal facility; scrap yards and inert

In addition to the criteria above, proposals for development within the SDNP will need to demonstrate that they do not compromise the statutory purposes and duty of the designation.

Policy WMP 6b

More Detailed Criteria for Waste Development

In addition to the preferences for locations for waste development indicated in Policy WMP 6a, before other locations are considered preference will be given to proposals for development on land meeting one or more of the following criteria:

a. General industrial land including general industrial estates;
b. Employment land (B2/B8 uses);
c. Previously-developed land;
d. Land already in waste management uses.

Waste built development at mineral workings or landfill sites may also be acceptable but will usually be restricted to temporary permissions reflecting the lifespan of the minerals operation or landfill site.

Land Disposal (WMP7a-7c)

Purpose of Policy WMP 7

To identify the need for land disposal of non-inert and inert waste. To provide a policy approach if such applications are submitted and to ensure that landfill gas produced by land disposal facilities is captured and used as a fuel.

Table 9 Forecast Requirements for Non-Inert Land Disposal

	Year							
	2011/12		2015/16		2020/21		2025/26	
	Min	Max	Min	Max	Min	Max	Min	Max
Forecast annual requirements (tonnes)	284,000	342,000	41,000	159,000	28,000	113,000	28,000	107,000

waste and aggregates recycling facilities serving the needs of a particular local area; Local scale composting e.g. on farms or small waste management sites receiving inputs from limited sources; or Household Waste Recycling Sites

3 Providing for Waste

Forecast total cumulative volume requirements from 2011/12 (cubic metres)	284,000	342,000	680,000	1,128,000	846,000	1,787,000	986,000	2,335,000

London's Waste

The South East Plan Policies W3 and W4, expect that capacity for the final disposal of residual waste[13] from London should, where appropriate, be provided in counties in the South East. The apportionment for East Sussex and Brighton & Hove is 1.06 million tonnes from 2006-2016 and 0.59 million tonnes from 2016 to 2025.

The County Council and City Council have consistently contested these policies considering that the approach was not justified and the disposal of London's waste in the area was unlikely to happen.

A detailed local study has been undertaken[14]. This has concluded on the basis of current infrastructure, there is no real prospect of waste travelling to East Sussex and there is no realistic expectation that appropriate land disposal capacity would be available.

Given these constraints and the poor proximity to London, it is not considered appropriate for the Authorities to provide for the landfill provision for waste from London as per policy W4 of the South East Plan, which negates the need to allocate the apportionment.

3.5 The Authorities have reviewed the initial appraisal of the Areas of Search for land raise and landfill, and the overall conclusion is that there is no real prospect for a land raise site in the Low Weald nor a realistic expectation that Ashdown Brickworks could provide capacity within the Plan period. Therefore no Areas of Search will be put forward in the Plan.

Ashdown Brickworks

Ashdown Brickworks is a large clay void located to the north-west of Bexhill which is allocated in the Waste Local Plan for non-inert landfill (Policy WLP10b). Although this site had been identified as offering potential for the development as a landfill for some time, no proposals have come forward. This situation has continued into the current period during which considerable quantities of waste are being transported to existing landfill sites beyond the Plan Area and the closure of Pebsham Landfill has become imminent. In any event, infill of the site at a rate that would be economically viable is dependent on the development of the 'Bexhill Hastings Link Road' (BHLR) and a separate 'Country Avenue'. The funding of the BHLR is dependent on a government decision which is expected in Spring 2012 and, even if funding is provided, it is therefore highly unlikely

13 Residual waste is the waste remaining after materials have been recovered from a waste stream by re-use, recycling, composting or some other recovery process

14 Residual Waste from London Study, 2009

that the whole connection to the A269 would be constructed before at least the mid 2020s. In these circumstances it is therefore considered that landfill at this site could not be delivered during the period of this Plan.

As demand for landfill will be at a very low ebb by the 2020s, it is not proposed to save the site specific allocation in the Waste Local Plan at Ashdown Brickworks.

Overarching Strategy for Land Disposal

Taking the above matters into account, the Authorities' strategy for non-inert land disposal is as follows:

1) Reduce the need for land disposal by reducing the amount of waste produced in the first place (Policies WMP 2a and WMP 2d).

2) Making provision for increased recovery of waste (Policy WMP 2b).

3) Safeguarding existing permitted land disposal capacity at Pebsham Landfill (Policy WMP 5).

4) Recognising that an amount of non-inert waste will still need to be disposed of to land and that this will be achieved utilising existing planning permissions outside the Plan Area (see Local Strategy Statement).

5) Planning for flexibility in the provision of capacity for recycling and recovery equivalent to the amount of waste that could be potentially exported out of the Plan Area for land disposal (Policy WMP 4b).

3.6 Whilst not proposing any new provision for land disposal, the following policy (WMP 7a) would be used if such an application is submitted.

Policy WMP 7a

Land Disposal of Non-Inert Waste

Proposals for the disposal of non-inert waste to land will only be considered as a last resort where it is demonstrated that:

a. the waste to be disposed of cannot be managed in a manner which is defined further up the waste hierarchy; and,
b. there is a clearly established need for the additional waste disposal to land capacity which cannot be met at existing permitted sites either within, or at an appropriate distance beyond, the Plan Area; and
c. it does not pose an unacceptable risk to the environment, including ground and surface waters, landscape character and visual amenity; and

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d. it can be demonstrated that it will not give rise to unacceptable implications for communities through adverse impacts on amenity or highway infrastructure; and,
e. the proposals form part of an engineering operation such as the restoration and/or stabilisation of a mineral void; and,
f. the resulting final landform, landscape and after-uses enhance the environment and are sympathetic to the land uses, nature conservation and amenity interests of the site and surrounding area, including landscape character and visual amenity.

In the case of landraise proposals for non-inert waste on greenfield sites, in addition to the requirements (a) to (f) above, permission will only be granted if all existing permitted land disposal and mineral working sites and appropriate previously developed sites within, and at anappropriate distance beyond the Plan Area, have been investigated and eliminated as unsuitable for non-inert waste disposal.

Policy WMP 7b

Deposit of Inert Waste on Land for Beneficial Uses

Proposals for the deposit of only inert waste on land will be permitted, subject to other policies of the Development Plan for the area, where relevant, where it is demonstrated that the proposal:

a. conforms with Policy WMP 7a (a, c, d, e); and
b. forms part of a comprehensive scheme for restoration of suitable previously developed land or minerals sites; or
c. significantly enhances other development or its setting; or
d. would result in appropriate measurable improvement to the use or operation of agricultural and/or forestry land; and
e. the resulting final landform, landscape and afteruse enhances the environment and is sympathetic to the land uses, landscape, visual amenity and nature conservation interests of the site and the surrounding area including its landscape character; and the minimum volume of inert material is used to achieve necessary improvements; and
f. where appropriate, the proposal includes ancillary on-site facilities for the recovery of the waste which can be managed by methods further up the waste hierarchy.

Policy WMP 7c

Management of Landfill Gas

Subject to other polices in the Plan, proposals for the disposal of non-inert waste and for the development of closed landfills generally, will only be permitted where it is demonstrated that:

a. the development includes measures to prevent the release of landfill gas that is produced by deposited waste; and,
b. for new proposals, landfill gas will be captured and used to produce the maximum amount of useful energy in the form of heat and/or electricity; and,
c. for closed landfills, where landfill gas is present in sufficient quantities it will be captured and used, as appropriate, to produce the maximum amount of useful energy in the form of heat and/or electricity; and
d. landfill gas will be managed in a manner that minimises risk to human health and the environment; and
e. in the case of proposals associated with planned or existing land disposal, they are planned in such a way as to minimise conflict with the restoration and after-use proposed for the site.

The Councils will control emissions of landfill gas from those closed land disposal sites that they are responsible for managing in order to minimise any risk to human health and the environment (e.g. from explosions risk or fires) and will seek to control emissions in order to minimise any climate change impacts.

Hazardous and Low Level Radioactive Waste (WMP8a, 8b)

Purpose of Policy WMP 8a

This policy is intended to ensure that:

a. capacity for the management of hazardous waste which make a locally, regionally or nationally significant contribution will be safeguarded;
b. the established important contribution made by the Plan Area to national and regional requirements for the management of certain hazardous wastes can continue;
c. the proportion of hazardous waste imports to the Plan Area, relative to exports, does not increase beyond the existing level; and
d. additional capacity can be developed, where required, for the management of certain types of hazardous waste arising from within the Plan Area.

Policy WMP 8a

Hazardous Waste

Existing capacity for the management of hazardous waste will be safeguarded, where this capacity makes a local, regional or nationally significant contribution to the management of specific hazardous waste streams.

Permission will be granted for proposals for the development of additional hazardous waste management capacity where it can be demonstrated that:

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a. any proposal for the development of capacity for managing imported hazardous waste will not result in the overall hazardous waste management capacity utilised for imports, exceeding the quantity of hazardous waste exported from the Plan Area; and
b. subject to any reassessment of the need for certain types of management capacity which has been undertaken and published, or in some other way approved, by the Authorities, the proposal provides additional capacity for the management of hazardous waste in the following ways:

- Treatment or incineration capacity (including thermal treatment technologies) for healthcare wastes[15];
- Expansion of existing treatment facilities or the introduction of novel treatment technologies for oil wastes;
- Treatment capacity for contaminated soils arising from construction, demolition and excavation where this is delivered via mobile treatment plant which can be moved close to the source of production.

Purpose of Policy WMP 8b

This policy is intended to ensure that:

a. where viable, Low Level Radioactive Waste (LLW) management capacity is provided in the Plan Area such that LLW can be managed close to its source of production;
b. in particular, the development of LLW incineration capacity, if incorporated as part of a wider scheme for the Plan Area, can be supported;
c. additional capacity could be provided to manage LLW from beyond the Plan Area but only where this would help achieve 'net self-sufficiency'; and
d. where additional capacity is developed for the management of LLW from beyond the Plan Area, that this capacity makes a significant contribution to the management of LLW arising within the Area.

Policy WMP 8b

Low Level Radioactive Waste

Subject to other policies of this Plan, permission will be granted for proposals for the development of additional LLW waste management capacity where it can be demonstrated that the proposal will be make a significant contribution to the management of LLW produced in the Plan Area.

15 The need for this additional capacity in future is dependent on the outcome of a planning application for such a facility in Eastbourne (currently programmed for a decision in early 2012)

Implementation of this policy may be subject to any reassessment of the need for certain types of management capacity which has been undertaken and published by the Authorities.

Management of Waste Water and Sewage Sludge (WMP9)

Purpose of Policy WMP 9

To allow for new waste water treatment capacity to be developed as appropriate.

To provide additional waste water treatment works capacity in the Hailsham area and additional sewage sludge treatment capacity in the period up to 2026, in accordance with identified needs.

Appropriate sites for both types of facilities will be considered in more detail in the Waste Sites DPD.

Policy WMP 9

Management of Waste Water and Sewage Sludge

Proposals for the provision of new wastewater management, treatment and disposal facilities will be supported where the development is a necessary extension or replacement of existing infrastructure, and where it is demonstrated that development is required to:

a. meet the relevant environmental standards;
b. improve the operational efficiency of wastewater and sewage sludge management principally to serve the needs of the Plan Area; or
c. enable planned development to be taken forward.

4 Providing for Minerals

Provision of Aggregates (WMP10)

Purpose of Policy WMP 10

To account for the proposed government apportionment for aggregates in order to assess the need for any further allocations of primary aggregates production.

Landbank/Reserve Requirement for Aggregates

Annual Allocation/reserve	Total allocation
0.1 mtpa , minimum 7 year equivalent landbank	0.8 million tonnes to 2017 1.7 million tonnes to 2026

Estimated Reserves 2011

Site	Dates of extraction (estimated)	Estimated Reserve (tonnes)
Stanton's Farm (Building Sand)	Up to 2017(1)	120,000
Scotney Court, Lydd Quarry	2011 - 2013(2)	750,000
Scotney Court extension and Wall Farm, Lydd Quarry	2013 - 2026(3)	3,230,000
Total Coarse Aggregates		**4,100,000**

1. Current permission expires in 2016
2. Extraction commenced in 2011 not 2014 as previously expected
3. Subject to further HRA. Assumes average annual extraction rate of 270,000 tonnes.

4.1 Although the total amount of aggregate estimated in the above table is over 4 million tonnes, it is expected that around 50% of the reserve at Lydd Quarry will serve the Kent market. If this is taken into account there is at least a total of around 2.1 million tonnes for the amount of resource expected to serve the Plan Area, which is still above the apportionment requirement. (16)

Policy WMP 10

Provision of Aggregates

The Authorities will maintain provision for the production of land won aggregates at a rate of 0.10mtpa throughout the Plan period.

16 (This is calculated as the full resource available at Stanton's Farm plus half the reserve from the permitted sites at Lydd Quarry within the boundary of East Sussex).

The Mineral Planning Authorities will maintain a landbank of at least 7 years of planning permission for the extraction of sand and gravel.

Provision of Gypsum (WMP11)

Purpose of Policy WMP 11

To safeguard and maintain supplies to and from the British Gypsum works throughout the Plan period.

Policy WMP 11

Provision of Gypsum

Reserves of at least 20 years of current production rates for mined gypsum will be maintained through the Plan period. The use of DSG and other alternative sources of gypsum will be supported to increase supply for the plasterboard factory and to safeguard and extend the lifetime of reserves of mined gypsum.

Provision of Clay (WMP12)

Purpose of Policy WMP 12

To safeguard and maintain sufficient supplies of clay for brick and tile manufacture.

Policy WMP 12

Provision of Clay

In order to sustain the manufacture of brick, tile and clay products in the Plan Area, continued production at existing brickworks will be supported, subject to other policies of the plan.

Proposals for extensions to clay workings will be supported, subject to other policies of the plan, where it can be shown that the levels of permitted reserve at that site is insufficient to maintain brick and tile production for up to 25 years.

4 Providing for Minerals

At existing clay sites, recycling of clay products, and stockpiling of clay waste materials on site for re-use in brick and tile manufacture will be supported. Any proposal for the use of clay from existing brickmaking sites for flood defences will need to demonstrate that the clay could not be sourced from other parts of the resource.

Safeguarding Resources (WMP13)

Purpose of Policy WMP 13

To set out how mineral resources will be safeguarded by identifying Mineral Safeguarding Areas (areas of known resources) and Mineral Consultation Areas (areas where the district or borough council should notify the Authorities of any alternative development proposals). Identifying Consultation Areas does not necessarily imply that the resource will be worked.

Policy WMP 13

Safeguarding Mineral Resources

The Authorities will safeguard areas for land-won resource to ensure viable resources are not sterilised.

As mineral resources in the Plan Area are particularly constrained, the Authorities will identify mineral consultation areas in the Mineral Sites DPD, and expect to be consulted on any proposal for major development that would have a significant impact on current or future operations.

In addition, other non-strategic mineral resources that might need protection will be identified through the Plan review process and in the Minerals Sites DPD. This will allow a viability assessment to be made around additional resource need over the plan period.[17]

Existing Mineral Safeguarding Areas and Mineral Consultation Areas for land-won minerals resources within the Plan Area

Gypsum:

- Brightling Mine/Robertsbridge Works, Mountfield

Sand and Gravel:

- Stanton's Farm, Novington

17 This is likely to include potential resources identified in the previous Minerals Local Plan

- Scotney Court Farm, Jury's Gap Road, Camber, near Lydd
- Scotney Court Extension and Wall Farm, Jury's Gap Road, Camber, near Lydd

Clay:

- Ashdown Brickworks, Bexhill
- Little Standard Hill Farm, Ninfield
- Chailey Brickworks, Chailey
- Hastings Brickworks, Guestling
- Aldershaw Farm, near Hastings
- Horam Brickworks, Horam

Safeguarding Wharves and Railheads (WMP14)

Purpose of Policy WMP 14

To safeguard railheads, wharves and rail sidings for existing and future mineral imports and processing. In particular to safeguard overall mineral wharf capacity in ports subject to no net loss of capacity, and to encourage co-location with processing capacity.

Policy WMP 14

Safeguarding railheads and wharves

Existing railhead and minerals wharf facilities (including rail sidings) and their consequential capacity will be safeguarded in order to contribute towards meeting local and regional supply for aggregates and other minerals as well as supporting modal shift in the transport of minerals. The need for railheads and minerals wharves will be monitored.

Capacity for landing, processing and handling of minerals at wharves in Shoreham, Newhaven and Rye Ports will be safeguarded. Alternative use proposals would need to demonstrate that there is no net loss of capacity for handling minerals within a port.

Local planning authorities will be expected to consult the minerals planning authorities on proposals for non-minerals development.

The Authorities will support the co-location of railheads and minerals wharves with processing capacity subject to it being demonstrated that this does not adversely affect space requirements for operational use.

4 Providing for Minerals

Oil and Gas (WMP15)

Purpose of Policy WMP 15

To provide a policy framework for any potential oil and gas exploration and extraction.

Policy WMP 15

A) Exploration for Oil and Gas

The Authorities will support proposals for the exploration for oil and gas where it can be demonstrated that there is no less sensitive location that could be utilised and that there is no unacceptable adverse impact on the environment or local amenity.

B) Appraisal for Extraction

Site identification for the extraction of oil or gas should meet the requirements of the policy framework of the Plan, having demonstrated the following sequence:

i. an area of search, with alternative sites, indicating consideration of sites outside sensitive areas or features including the High Weald AONB and South Downs National Park;
ii. avoidance of environmental harm; and
iii. mitigation and compensation of environmental harm.

C) Production

In addition, when considering the merits of any extraction proposal, the Authorities will assess

i. how the oil and gas will be transported from site; and
ii. how additional impacts of production will be avoided, and
iii. the potential for acceptable mitigation, where impacts cannot be avoided

in addition to other policies within the Plan, including those relating to site restoration and the potential for community benefit.

Restoration (WMP16)

Purpose of Policy WMP 16

To secure appropriate restoration of mineral workings and waste sites. Restoration should seek environmental and amenity benefits reflecting local circumstances and relevant landscape and biodiversity objectives. Proposed afteruses are likely to require ongoing management.

Policy WMP 16

Restoration

Proposals for minerals extraction, land disposal and minerals and waste processing should include a scheme for progressive restoration and aftercare to the highest standard which is appropriate to the agreed after-use and which can be achieved in an acceptable timescale. Restoration, after-use and aftercare arrangements should maximise the potential benefits, enhancements and opportunities, particularly for landscape and biodiversity.

All proposals should:

a. be sensitive to and in keeping with local landscape character and distinctiveness;
b. demonstrate how proposed habitat restoration and creation plans can assist in achieving Biodiversity Action Plan targets;
c. demonstrate how the amenity value of the restored site could be realised;
d. include details of ongoing aftercare arrangements which aim to support and achieve the proposed after-use; and
e. meet the requirements of policies WMP 27a on flooding, WMP 27b groundwater and water quality, WMP 23a climate change, WMP 24 amenity, and WMP 26 on the environment and environmental enhancements.

Restoration obligations will be secured where required.

Inactive and dormant sites will be reviewed. Appropriate action will be considered if it was demonstrated that reopening sites would result in an unacceptable adverse impact.

5 Overarching Policies

Transport - Road, Rail and Water (WMP17)

Purpose of Policy WMP 17

To minimise the environmental and amenity effects of the transport of waste and minerals by promoting rail and water transport as an alternative to road transport.

Detailed, site-specific, transport impacts are covered by Policy WMP 25.

Policy WMP 17

Transport - Road, Rail and Water

Waste and minerals development should seek to minimise transport movements and prefer non-road modes of transport subject to the practicalities pertaining to individual cases.

Proposals for waste and minerals development should demonstrate:

a. how movements relate to waste and minerals sources;
b. how opportunities for alternative methods of transport have been evaluated;
c. how access to the strategic highway network is suitable and how impacts on road safety and congestion have been addressed; and
d. what measures have been incorporated including mitigation to avoid unacceptable harm to the environment and local communities.

The Authorities will seek to maximise the use of existing railheads and rail links. Proposals which will enable waste and/or minerals to be carried on the rail network or by water will be permitted, subject to other policies of the Plan where relevant, and where it is demonstrated that this would achieve overall environmental benefits.

Co-location of Complementary Facilities (WMP18)

Purpose of Policy WMP 18

To encourage co-location of complementary waste or minerals processing facilities and associated industries, where this would offer either operational or cost efficiencies or transport benefits.

Policy WMP 18

Co-location of Complementary Facilities

The Authorities will encourage opportunities to co-locate facilities provided this does not cause unacceptable impacts on the environment or communities.

Any proposal involving co-location must:

a. address the likely cumulative impacts of the proposal to ensure that overall effects on communities and the environment are within acceptable limits including noise, transport movements, and emissions to air;
b. take into account the locational strategies and Areas of Focus identified elsewhere in the Plan.

Proposals for co-locating ancillary uses at landfill sites should be tied to the life of time-limited operations of the landfill site.

Community Involvement and Benefits (WMP19)

Purpose of Policy WMP 19

To encourage developers to take a more proactive approach and engage with local communities as early as possible to help avoid misunderstandings and reduce anxiety related to waste or minerals-related developments, and also to ensure that where there are potential benefits for the community, that those benefits are realised by people living or working close by.

The policy aims to readdress a perceived lack of engagement between host communities and developers/the waste and minerals industry in the submission of planning applications for waste or minerals developments. It seeks not only to reduce negative experiences of communities but actually to secure positive benefits for host communities.

Policy WMP 19

Community Involvement and Benefits

Applicants should demonstrate how host communities have been involved in the development of the proposal, taking into account best practice, and show how their concerns have been addressed. Subject to agreement with the minerals and waste planning authority, this policy may not apply to some proposals involving small non-strategic facilities, minor extensions or alterations to existing facilities.

5 Overarching Policies

Applicants should investigate concerns of those communities and provide information about any perceived risks held by them.

For communities hosting strategic waste or minerals developments which serve a much wider area, the proposal should set out the tangible benefits to the local host community.

Opportunities for Sustainable Waste Management and Minerals Production in Other Developments (WMP20)

Purpose of Policy WMP 20

To ensure that objectives of sustainable waste management and minerals production are considered in the preparation and determination of non-waste and minerals applications, where appropriate.

This policy is concerned with maximising opportunities for improving the sustainable management and transport of waste that has already been produced - prevention of waste is dealt with elsewhere in this Plan.

This policy is not intended to address the management of waste arising from construction and demolition which is dealt with separately by Policy WMP 2d.

It is envisaged that this policy will be implemented by all planning authorities in the Plan Area.

Policy WMP 20

Opportunities for Sustainable Waste Management and Minerals Production in Other Developments

In all proposals for large scale non waste and minerals development[(18)]:

a. applicants should show how opportunities for accommodating strategic sustainable waste management and minerals production as described in this Plan have been considered; and,
b. in determining such proposals, Local Planning Authorities should pursue opportunities for meeting the objectives of sustainable waste management and minerals production as set out in this Plan.

18 'large scale' non-waste or non-mineral developments will be defined by their size and nature and will include development requiring Environmental Impact Assessment. Developments are likely to include the following: 1) Development of housing defined by number of units and/or floor area (square metres); 2) Development of industrial facilities defined by developed area (hectares); 3) Agricultural developments defined by developed area (hectares); 4) Development involving the generation of heat and/or power defined by energy produced (MW); 5) District heating schemes; 6) Distribution centres. N.B. This is not intended to be an exhaustive list.

Expansion and Alterations to Waste Facilities (WMP21)

Purpose of Policy WMP 21

To enable expansions of capacity or alterations to operations within existing waste management facilities.

Policy WMP 21

Expansions and Alterations within the Site Boundary of Existing Waste Facilities

Proposals for expansions or alterations within the site boundary of existing waste management facilities will be supported in principle where it is demonstrated that:

a. the development is required to meet current environmental standards including improving energy efficiency; or
b. the development is required to improve the operational efficiency of the facility, including the efficiency with which the facility uses or generates energy; and
c. the development would contribute towards meeting the Objectives of the Plan.

6 Development Management Policies

Design Principles for Built Waste Facilities (WMP22a,22b)

Purpose of Policy WMP 22

To provide guidance about more detailed design and operational aspects for built waste facilities, and to support the spatial policies regarding waste facilities. It focuses on non-functional components of waste facilities and does not seek to address issues associated with technical design, but recognises the interface between the two is important.

The policy also links with the Community Involvement policy (WMP 19), about involving host communities in the design of facilities, with the Climate Change policy (WMP 23) which seeks design aspects which contribute to minimising greenhouse gas emissions, and with the Resource and Energy policy (WMP 23b).

Policy WMP 22a

Design Principles for Built Waste Facilities

All buildings associated with waste and minerals developments should be of a scale, form and character appropriate to its location and incorporate innovative design, where appropriate, and allow sufficient space for the effective sorting, recycling and recovery of waste.

Opportunities should be taken to provide efficient separation from more sensitive land uses and where possible mitigation measures should integrate existing environmental assets and maximise opportunities for appropriate habitat creation.

Urban locations:

a. design should complement the existing or planned scale and built form of the local area and take account of local landscape character and distinctiveness;

Urban fringe/new development sites:

a. design should complement the planned scale and built form of the local area and/or the new development area, and take account of local landscape character and distinctiveness; and,
b. waste management should be considered in the initial masterplan; and,
c. masterplans should consider separation from more sensitive land uses.

Rural locations:

a. buildings should reflect the nearby built form or reuse redundant farm buildings;
b. design should take account of local landscape character and distinctiveness;

c. site locations should allow sufficient space for quality landscape treatment; and
d. site design should minimise views to operational areas, particularly external storage and parking and other elements that present a more 'industrial' appearance.

Policy WMP 22b

Operation of Sites

Proposals for waste management, mineral extraction / processing, and associated activities should be accompanied by a working programme for the proposed operation which includes arrangements as applicable for the scale and nature of the operation, for:

a. site preparation;
b. phasing of workings/construction;
c. plant and machinery to be used;
d. location of site roads, material storage areas, buildings and provision of screening of working areas and cleaning of vehicles;
e. protection of existing features of cultural and landscape significance;
f. a mitigation/compensation scheme for any other environmental impacts and enhancements; and
g. a landscaping scheme for the operational life of the site to include a means of screening the proposed development, including planting, with native species where appropriate,to maximise opportunities for habitat creation and supported by a management plan.

Proposals for mineral extraction should additionally set out the arrangements for:

a. stripping, storage and re-spreading of soils;
b. appropriate stockpiling;
c. the order and direction of workings and methods of extraction; and
d. a scheme for progressive restoration and aftercare to the highest standard which is appropriate to the agreed after-use and which can be achieved in an acceptable timescale.

Climate Change (WMP23a, 23b)

Purpose of Policy WMP 23

To set out how waste and minerals developments should seek to mitigate and adapt to climate change.

6 Development Management Policies

It supplements the guidance about climate change set out in national policy (PPS1) because a) the Plan Area is coastal so climate change is a particular concern, and b) national policy about design is not specific to waste or minerals developments.

Proposals for waste and minerals development should set out how they will minimise greenhouse gas emissions, either through design, construction or operations.

Diversion of waste from landfill and movement up the waste hierarchy also contributes to mitigating climate change - this is covered in Policy WMP 2 Implementing the Waste Hierarchy. Policy WMP 23 deals with the more detailed aspects of how waste or minerals operations themselves can take measures to mitigate and adapt to the impacts of climate change.

Policy WMP 23a

Climate Change

Proposals for minerals or waste management, including restoration proposals, must take account of climate change for the lifetime of the development from construction through to operation and decommissioning.

Measures should be incorporated to minimise greenhouse gas emissions ('mitigation') and to allow flexibility for future adaptation to the impacts of climate change ('adaptation'), which may include some or all of the following:

a. locating and designing the facility, and designing transport related to the development, in ways that seek to minimise greenhouse gas emissions;
b. incorporating carbon off-setting measures;
c. Use of renewable, decentralised, or low carbon energy sources to power the facility;
d. incorporating measures to minimise flood risk associated with the development; and
e. measures to minimise waste materials generated from operational processes.

The information supplied and the measures to be incorporated into the design should be appropriate to the scale and nature of the proposals. It is likely therefore that larger scale proposals may be expected to show more detailed mitigation and adaptation measures and provide more information than smaller-scale permissions or proposals for temporary waste facilities.

Policy WMP 23b

Resource and Energy Use

Proposals should incorporate carbon offset measures and should be designed in such a way as to minimise greenhouse gas emissions. Applicants should demonstrate that during operation of any facility:

a. energy (including heat) will be obtained from renewable sources where possible (although on-site generation of energy should not prejudice the movement of waste up the waste hierarchy); and
b. measures will be taken to minimise waste from operational processes and maximise energy efficiency.

General Amenity (WMP24)

Purpose of Policy WMP 24

To protect local communities from the potential negative impacts of waste and minerals development such as those resulting from noise, dust, fumes, windblown litter, and visual intrusion.

Policy WMP 24

General Amenity

All proposals should ensure:

a. there is no unacceptable effect on the standard of amenity appropriate to the established, permitted or allocated land uses of the local and host communities likely to be affected by the development including transport links;

b. there is no significant adverse impact on air quality or the local acoustic environment;

c. adequate means of controlling noise, dust, litter, odours and other emissions, including those arising from traffic generated by the development, are secured;

d. there is no unacceptable effect on the recreational or tourist use of an area, or the use of existing public access or rights of way.

Where proposals require an Environmental Impact Assessment, applicants should consider the potential impacts on human health.

6 Development Management Policies

Traffic Impacts (WMP25)

Purpose of Policy WMP 25

To ensure that proposals fully address the site-specific issues related to road transport and traffic of waste or minerals developments.

This policy links with WMP 17 Transport - Road, Rail and Water.

Policy WMP 25

Traffic Impacts

Proposals will be permitted where:

a. access arrangements are appropriate or could be made suitable for the volume and nature of traffic generated by the proposal;
b. no unacceptable safety hazards for other road users, cyclists and pedestrians would be generated;
c. the level of traffic generated would not exceed the capacity of the local road network;
d. no unacceptable adverse impact upon existing highway conditions in terms of traffic congestion and parking would arise;
e. there are suitable arrangements for on site vehicle manoeuvring, parking and loading/unloading areas; and
f. adverse traffic impacts that would arise from the proposal can be satisfactorily mitigated by routeing controls or other highway improvements.

Consideration of these matters should take into account existing and other planned development.

Environment and Environmental Enhancement (WMP26)

Purpose of Policy WMP 26

To protect and enhance the built and natural environment including:

- Natural assets;
- Biodiversity;
- Landscapes;
- Historic environment;
- Geology and geomorphology;

- Heritage assets; and
- Landscape character.

This policy also links with the policy about design of built facilities.

Policy WMP 26

Environment and Environmental Enhancement

a) To conserve and enhance the local character and environment of the Plan Area, permission will not be granted where the development would have a significant adverse impact on the following sites :

- South Downs National Park (see Policy WMP 1);
- High Weald AONB;
- Listed Buildings;
- Scheduled Monuments;
- Conservation areas;
- Registered Parks and Gardens;
- Registered Battlefields;
- Designated wreck sites;
- Significant Heritage Assets;
- High quality agricultural land;
- other sites recognised for their cultural heritage and historic significance.

These assets should be protected and where appropriate, enhanced.

b) Environmental enhancement - biodiversity and habitat creation

To conserve and enhance the local natural environment, the Authorities will maximise opportunities for increasing biodiversity and habitat creation. Permission will not be granted where the development would have a significant adverse impact on sites of national and local importance for nature conservation including:

- Sites of Special Scientific Interest;
- Local sites, identified for their biodiversity interest, including Sites of Nature Conservation Importance and Local Nature Reserves;
- Areas of significance for geodiversity and geomorphology, including local sites and Regionally Important Geological and Geomorphological Sites;
- Ancient woodlands;
- Land managed under an agri-environment agreement.

C) International Designations

These sites and protected species have statutory protection. Any development with a negative assessment of the implications of the proposal would need to demonstrate imperative reasons of overriding public interest.

6 Development Management Policies

International Designations: Special Areas of Conservation, Special Protection Areas and Ramsar sites;

In order to assess whether a proposal will have likely significant effects on a designated site, the following criteria will be used to help determine where a project level Habitats Regulation Assessment is required with a planning application:

Table 1

Pathway	Screening Distance
Air Quality - Energy from Waste	10km from a European Site
Air Quality - Landfill Gas Flares	1km from a European Site
Air Quality - Biopathogens	1km from a European Site
Air Quality - Dust	500 m from a European Site
Air Quality - Vehicle exhaust emissions	200 m from a European Site
Water quality and flow	No standard distance (use Source/Pathway/Receptor approach)
Disturbance (noise/visual)	1km from a European Site supporting disturbance sensitive species/populations
Gull/corvoid predation (non-inert landfill only)	5km from European site supporting sensitive ground-nesting breeding species (e.g. Terns)
Coastal squeeze	No standard distance -evaluate on case by case basis

Any waste or minerals development that is likely to result in an increase of more than 200 Heavy Duty Vehicles per day[19] on any road that lies within 200m of a European site will be subject to HRA screening to evaluate air quality impacts. It will be necessary for the applicant to demonstrate that either:

- The increased traffic will not lead to an increase in nitrogen deposition within all European sites that lie within 200m that constitutes more than 1% of the critical load for the most sensitive habitat within the site; or
- If the increase in deposition will be greater than 1% of the critical load it will nonetheless be sufficiently small that no adverse effect on the interest features and integrity of the European site will result.

19 The Design Manual for Roads and Bridges (Voulme 11, Section 3, Part 1) regarding air quality environmental impact assessment from roads indicates that if the increases in traffic will amount to less than 200 HDV movements per day the development can be scoped out of further assessment.

The protection of bird species within designated areas includes protection against predation and disturbance. In order to adequately assess the potential impacts of a proposal, applicants will be required to:

- Undertake a project level Appropriate Assessment to determine whether adverse disturbance effects would result on the SPA. This may require bespoke surveys potentially over several years and covering both the minerals/waste site location and the SPA itself;
- If necessary, introduce noise control measures to the satisfaction of the local authority and Natural England in order to render any disturbance impacts negligible; and
- Introduce regular monitoring (frequency, duration and details to be agreed with the local authority and Natural England) to ensure that the effectiveness of any control measures that are introduced is evaluated and additional/alternative measures deployed as necessary.
- If it is not possible for the application to demonstrate that any noise or disturbance impacts cannot be adequately mitigated then permission will be refused.

Flooding and Groundwater (WMP27a,27b)

Purpose of Policy WMP 27

To ensure that flood risk and potential impacts on groundwater and water quality are taken into consideration in determining waste and minerals development proposals.

Policy WMP 27a

Flood Risk

Development will only be permitted if it can be demonstrated that a proposal:

a. adequately provides for the implications of flood risk in that it would not increase the risk of flooding on the site or elsewhere and where possible reduce the risk of flooding overall;
b. is not detrimental to the integrity of sea, tide or fluvial flood defences or river channels;
c. would not impede access for future maintenance or improvements of flood defences;
d. has no significant adverse impact on the nature conservation and amenity value of rivers, wetlands or the marine environment; and
e. has appropriate measures in place to reduce surface water run-off, including the provision of sustainable drainage systems (SUDS); and
f. would not require any additional protection from flood or erosion such that it would be in contravention of the existing Shoreline Management Plans and/or Catchment Flood Management Plans.

6 Development Management Policies

Development proposed in areas of flood risk (flood zones 2, 3a, or 3b) must apply the Sequential Test and where applicable the Exceptions Tests, as set out in national policy and carry out a site level Flood Risk Assessment. Proposals should also take into account recommendations in the Strategic Flood Risk Assessment for East Sussex and Brighton & Hove, or for the relevant district/borough council, whichever is more recent.

Policy WMP 27b

Groundwater and Water Quality

To protect the quality of groundwater in the natural environment of the Plan Area, including abstraction areas within the chalk of the South Downs, the Authorities will not grant permission for proposals which:

a. cause unacceptable risk to the quality of surface and groundwater (including reservoirs);

b. cause changes to groundwater levels which would result in unacceptable adverse impacts on

   i. adjoining land;

   ii. the quality of groundwater resources or potential groundwater resources; and

   iii. the potential yield of groundwater resources, river flows or natural habitats.

Work beneath the water-table will not be permitted unless there is a comprehensive groundwater management scheme agreed for the construction, operation and restoration of the proposal.

6.1 In addition to the policies above, proposals will be subject to environmental regulation [20] through the Environment Agency. Groundwater is classified into Source Protection Zones 1, 2 and 3. [21]

6.2 Applications for both waste and minerals operations within Source Protection Zones should be accompanied by a hydrological assessment. Waste operations and working for minerals are not usually considered compatible within SPZ1.

20 including Regulation 5 of the Landfill (England and Wales) Regulations 2002 and Environment Agency's Groundwater Protection: Policy and Practice (GP3)

21 Zone 4 designations will now be incorporated into Zones 1, 2 or 3.

Implementation and Monitoring

7.1 How will we implement and monitor the effectiveness of the Plan

7.2 Monitoring and reporting on the implementation of the policies in the Plan is important to establish whether they are being successful is achieving their aims. Monitoring also allow corrective action to be taken if the aims of the Plan are not being met.

7.3 The Plan is founded on a vision and objectives (see section 2) that need to be met to ensure that the vision is realised. The delivery strategy for meeting objectives is based on a framework of strategic policies which are linked to implementation plans.

7.4 The Plan policies and associated implementation plans include 'SMART' (Specific, Measurable, Achievable, Relevant and Time bound) targets, which can be monitored. Performance against these targets will be evaluated and reported on annually in the Annual Monitoring Report (AMR). The AMR will also consider the monitoring requirements of the sustainability appraisal report.

7.5 Dialogue with key delivery partners, including District and Borough Councils, the waste and minerals industry, community groups and the Environment Agency will take place on an annual basis, to review progress against the Plan Implementation Strategy.

7.6 A report on the AMR will be taken to the relevant Members for their consideration, will include recommendations for necessary corrective actions to address missed targets.

8 Saved Policies

8.1 The following policies will **not** be replaced by the new Waste and Minerals Plan and are therefore still saved until replaced by subsequent development plan documents, including the Waste Sites DPD. The adopted Waste Local Plan (2006)[22] and Minerals Local Plan (1999)[23] can be found on the Councils' websites.

Waste Local Plan:

8.2 **WLP7 Site Specific Allocation for Road to Rail Transfers**, which identifies Sackville Coalyard, Hove;

8.3 **WLP8 Site Specific Allocations for Material Recovery Facilities/Waste Transfer Stations**, which identifies sites at:

- Hangleton Bottom
- Hollingdean Depot (this area has been partially developed for a MRF and WTS)
- Bellbrook Industrial Estate
- Land at Tutts Barm
- Pebsham WDF

8.4 **WLP9 Site Specific Allocation for Energy from Waste and Materials Recovery Facilities**, which identifies North Quay (this area has been partially developed for an Energy Recovery Facility);

8.5 These policies will be reviewed through the process of preparing the Site Allocations document, work on which is due to commence after the Waste & Minerals Plan has been adopted.

Minerals Local Plan:

8.6 Subject to ongoing reviews of mineral sites under the Habitats Regulations, the following sites policies are still saved until replaced by subsequent development plan documents, including the Mineral Sites DPD.

8.7 **Policy 3 and Policy 4.**[24]

8.8 **Policy 32** Safeguarding

8.9 **Policy 36** Review of Sites

8.10 All the sites that benefit from planning consent will be reviewed between 2012 and 2017 under the Environment Act 1990. There will be a separate Review of Consents under the Habitats Regulations (consolidated), once the proposed Dungeness to Pett Level SPA and Ramsar site is designated by the Secretary of State (as recommended by Defra).

22 http://www.brighton-hove.gov.uk/index.cfm?request=a800
23 http://www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste/mineralslocalplan.htm
24 There is no further access to resource at Sovereign Harbour, and Scotney Court Extension and Wall Farm have planning permission.

Replaced Policies

9.1 It is proposed that the following policies will be replaced by the Waste and Minerals Plan

Replacement of policies in the Waste Local Plan

Waste Local Plan policy		Waste & Minerals Plan policy/ies	
WLP1	The Plan's Strategy	WMP 2	Implementing the Waste Hierarchy
		WMP 2a	Promoting waste prevention, re-use and waste awareness
		WMP 4a	Provision of built waste facilities
		WMP 4b	Provision of built waste facilities with additional provision to cover flexibility
		WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 17	Transport
		WMP 18	Co-location
WLP2	Transport Strategy	WMP 17	Transport
		WMP 25	Traffic impacts
		WMP 23a	Climate Change
WLP3	Areas of Outstanding Natural Beauty	WMP 1	South Downs National Park
		WMP 6a	Sustainable locations for waste development
		WMP 26	Environment and Environmental Enhancement
WLP4	Road to rail or water transfer	WMP 5	Safeguarding waste sites
		WMP 14	Safeguarding wharves and railheads
		WMP 17	Transport
WLP5	Safeguarding sites	WMP 5	Safeguarding waste sites
WLP6	Expansions or alterations to existing facilities	WMP 21	Expansion and alterations to waste facilities

9 Replaced Policies

Waste Local Plan policy		Waste & Minerals Plan policy/ies	
WLP10 a,b	Site specific allocations for waste disposal to land	WMP 7a	Land disposal of non-inert waste
WLP11	Reduction, re-use and recycling during demolition and design, and construction of new developments	WMP 2d	Minimising and managing waste during construction, demolition and excavation
		WMP 22a	Design of waste and minerals development: design principles
		WMP 22b	Operation of sites
		WMP 23a	Climate change
WLP12	Recycling as part of major development	WMP 20	Opportunities for waste management and minerals production in other development
WLP13	Recycling, transfer and materials recovery facilities	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
WLP14	Recycling and recovery facilities for construction and demolition waste	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
WLP15	Small Scale recycling / bring banks	WMP 2b	Turning waste into a resource
		WMP 2e	Provision for waste in new development
WLP16	household waste sites	WMP 2e	Provision for waste in new development
		WMP 6a	Sustainable locations for waste development
WLP17	Reprocessing industries	WMP 2	Implementing the waste hierarchy
		WMP 2b	Turning waste into a resource
WLP18	Composting facilities	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 22a	Design of waste and minerals development: design principles
WLP19	Energy from waste facilities	WMP 2c	Production of energy from waste

Replaced Policies 9

Waste Local Plan policy		Waste & Minerals Plan policy/ies	
		WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 22a	Design of waste and minerals development: design principles
		WMP 23a	Climate change
WLP20	Landfilling - non-inert waste	WMP 7	Land disposal
WLP21	Landraising - non-inert waste	WMP 7	Land disposal
WLP22	Landfill gas	WMP 7c	Management of landfill gas
WLP23	Landfilling - inert waste	WMP 7b	Deposit of inert waste for beneficial uses
WLP24	Landraising/improvement with inert waste	WMP 7b	Deposit of inert waste for beneficial uses
WLP25	Landfill mining	WMP 2	Implementing the waste hierarchy
		WMP 26	Environment and heritage
		WMP 27b	Groundwater
WLP26	Mineral waste	WMP 2d	Minimising and managing waste during construction, demolition and excavation
		WMP 3	Sustainable provision and use of minerals
		WMP 18	Co-location of complementary facilities
WLP27	Special and difficult wastes	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 8a	Hazardous waste
		WMP 8b	Low level radioactive waste
WLP28	Onsite clinical waste facilities	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 8a	Hazardous waste

9 Replaced Policies

Waste Local Plan policy		Waste & Minerals Plan policy/ies	
		WMP 8b	Low level radioactive waste
WLP29	Independent clinical waste facilities	WMP 6a	Sustainable locations for waste development
		WMP 6b	Detailed criteria
		WMP 8a	Hazardous waste
		WMP 8b	Low level radioactive waste
WLP30	Wastewater and sewage sludge	WMP 9	Management of waste water and sewage sludge
WLP30A	Wastewater and sewage sludge (Brighton & Hove/Peacehaven catchment)	Facility is under development. Policy not to be replaced	
WLP31	Disposal of liquid waste and dredgings on land for its improvement	WMP 7	Land disposal
WLP32	Liquid Waste facilities	WMP 8	Hazardous waste
WLP33	Agricultural and stable wastes	WMP 2	Implementing the waste hierarchy
WLP34	Animal carcass waste	WMP 2	Implementing the waste hierarchy
WLP35	General amenity considerations	WMP 22a	Design of waste and minerals development: design principles
		WMP 24	Amenity
		WMP 26	Environment and Environmental Enhancement
WLP36	Transport considerations	WMP 17	Transport
		WMP 25	Traffic impacts
WLP37	Flood defences, flood plains and surface water runoff	WMP 27a	Flood risk
WLP38	Surface and groundwater	WMP 27b	Groundwater
WLP39	Design considerations	WMP 22a	Design of waste and minerals development: design principles
		WMP 24	Amenity
		WMP 26	Environment and heritage

Replaced Policies 9

Waste Local Plan policy		Waste & Minerals Plan policy/ies	
WLP40	Environmental improvements and other benefits	WMP 2c	Production of energy from waste
		WMP 19	Community involvement and benefits
		WMP 23a	Climate change

Replacement of policies in the Minerals Local Plan

Minerals Local Plan policy		Waste & Minerals Plan policy/ies	
1	General Approach	WMP 3	Sustainable Provision and Use of Minerals Overarching Policies DM policies
2	Future Provision of Aggregates	WMP 10	Provision of Aggregates
3	Sites for the provision of sand and gravel extraction	Not replaced. Updated approach set out in Policy WMP13, but policy will not be replaced until production of the Mineral Sites DPD.	
4	Preferred Areas and Areas of Search	Not replaced. Updated approach set out in Policy WMP13, but policy will not be replaced until production of the Mineral Sites DPD.	
5	Outside the Areas of Search and Preferred Areas		
6	Extraction of aggregates at Broomhill North, Scotney Court extension and Wall farm	WMP 3 WMP 10 WMP 17	Sustainable Provision and Use of Minerals Provision of Aggregates Transport (waste and minerals) DM policies
7	Rye Harbour	Not replaced	
8	Shoreham	WMP 14 WMP 17	Safeguarding wharves and Railheads Transport (waste and minerals)

9 Replaced Policies

Minerals Local Plan policy		Waste & Minerals Plan policy/ies	
9	Newhaven	WMP 14	Safeguarding wharves and Railheads
		WMP 17	Transport (waste and minerals)
10	Rail transport from Newhaven	WMP 14 WMP 17	Safeguarding wharves and Railheads Transport - Road, Rail and Water
11	Rye	WMP 14 WMP 17	Safeguarding wharves and Railheads Transport (waste and minerals)
12	Mountfield Coated Roadstone Plant	WMP11 WMP 17	Provision of Gypsum Transport - Road, Rail and Water
13	Rail Depots	WMP 17	Transport - Road, Rail and Water Overarching Policies DM policies
14	Recycling Material	WMP 2	Implementing the waste hierarchy Overarching Policies DM policies
15	Existing Clay Sites	WMP 12	Provision for Clay
16	New Clay sites	WMP 12	Provision for Clay Overarching Policies DM policies
17	Future Clay Reserves	WMP 3 WMP 12	Sustainable Provision and Use of Minerals Provision for Clay
18	Clay working in the AONB	WMP 12	Provision for Clay

Replaced Policies 9

Minerals Local Plan policy		Waste & Minerals Plan policy/ies	
			Overarching Policies DM policies
19	Ashdown Brickworks (clay extraction)	WMP 12 WMP17	Provision for Clay Transport - Road, Rail and Water Overarching Policies DM policies
20	Chalk	WMP 3 WMP1	Sustainable Provision and Use of Minerals South Downs National Park DM policies
21	Tarring Neville	WMP 3	Sustainable Provision and Use of Minerals DM policies
22	Filching Quarry restoration	WMP 16	Restoration Overarching Policies DM policies Waste policies
23	Meeching Quarry		Not replaced, not saved
24	Cement Manufacture	WMP 3 WMP 1	Sustainable Provision and Use of Minerals South Downs National Park Overarching Policies DM policies
25	Chalk for construction fill	WMP 3	Sustainable Provision and Use of Minerals DM policies

9 Replaced Policies

Minerals Local Plan policy		Waste & Minerals Plan policy/ies	
26	Gypsum	WMP 11	Provision of Gypsum Overarching policies
27	Restoration and management around Robertsbridge and the Brightling Mine	WMP 16	Restoration Overarching Policies DM policies
28	Retention of rail link at Robertsbridge	WMP 17	Transport- Road, Rail and Water
29	Plasterboard Manufacturing and recycling	WMP11	Provision of Gypsum Waste recycling policies
30	Hydrocarbons	WMP 15	Oil and Gas Overarching Policies DM policies
31	Development Control- Environmental Assessment		Overarching Policies DM policies
32	Safeguarding	Updated approach set out in Policy WMP13, but policy will not be replaced until production of the Mineral Sites DPD.	
33	Breaches of planning control	Not replaced	
34	Restoration	WMP 16	Restoration Overarching policies DM policies
35	After-use	WMP 16	Restoration Overarching policies DM policies
36	Review of Sites	Not replaced	

Glossary

Aggregates – sand, gravel, crushed rock that is used in the construction industry to make things like concrete, mortar, drainage, and asphalt. For secondary or recycled aggregates, see below.

Agricultural waste – waste from a farm or market garden such as pesticide containers, tyres, and old machinery.

Annual Monitoring Report (AMR) – document which monitors the implementation of planning policies in the Waste Local Plan and Minerals Local Plan and will monitor the implementation policies in the Core Strategy, once adopted. It also monitors progress in meeting the milestones in the Minerals and Waste Development Scheme.

Apportionment – the allocation between minerals and waste authorities of the regional amount of required mineral production or quantities of waste to be managed, for a particular period of time. These requirements are set out in the South East Plan.

Area of Outstanding Natural Beauty (AONB) – area with a statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.

Area of search - a broad geographic area within which a site, on which a waste management facility could be developed, could be found which is more likely to be acceptable than a site which is identified outside of the area.

Biodegradable – materials that can be broken down by naturally-occurring micro-organisms. Examples include food, garden waste and paper.

Biodiversity Action Plan (BAP) - strategy prepared by the Local Planning Authority together with nature conservation organisations to aimed at protecting and enhancing the biological diversity.

Biological Diversity / Biodiversity - The variety of life including plants, animals and micro-organisms, ecosystems and ecological processes.

Built waste facilities - There are waste management facilities that treat or transfer (bulk up) waste rather than landfill it. Treatment includes recycling or other recovery, the most common kinds of built waste facilities involve Materials Recovery (screening and sorting), stockpiling materials, Anaerobic Digestion, Mechanical Biological Treatment or Energy Recovery Facilities. The size and scale, and therefore the appearance, of buildings housing waste management facilities varies depending on the type of facility and the quantity of waste being managed.

Commercial and Industrial waste (C&I) - waste produced by business and commerce, and includes waste from restaurants, offices, retail and wholesale businesses, and manufacturing industries.

Composting – the breaking down of organic matter aerobically (in presence of oxygen) into a stable material that can be used as a fertiliser or soil conditioner.

Glossary

Construction, Demolition and Excavation waste (CDEW) - Waste arising from the construction and demolition of buildings and infrastructure. Materials arising in each of the three streams (i.e. Construction; Demolition; Excavation) are substantially different: construction waste being composed of mixed non inert materials e.g. timber off cuts, plasterboard, metal banding, plastic packaging; demolition waste being primarily hard materials with some non inert content e.g. bricks, mortar, reinforced concrete; and excavation waste being almost solely soft inert material e.g. soil and stones.

Core Strategy - Former name of the Waste & Minerals Plan DPD.

Development Plan Documents (DPDs) - Spatial planning documents that are subject to independent examination. They will have 'development plan' status. A Core Strategy DPD and a Site Allocations DPD are key parts of any Local Development Framework or Waste and Minerals Development Framework.

Dormant mineral site -a site defined by the Environment Act 1995 as "dormant" where 'no minerals development has been carried out to any substantial extent in, on or under the site at any time in the period from 22 February 1982 to 6 June 1995'. Mineral working cannot take place at a dormant site unless full modern planning conditions have been submitted and approved by the Minerals Planning Authority.

End of Life Vehicles (ELV) - these are vehicles that have reached the end of their life and therefore require scrapping. Their management is specifically covered by the End of Life Vehicle Directive which aims to reduce the amount of waste produced from vehicles when they are scrapped.

Energy recovery – covers a number of established and emerging technologies, though most energy recovery is through incineration technologies. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis.

Environment Agency (EA) – Government agency that aims to protect and improve the environment.

Environmental Impact Assessment (EIA) - study to evaluate the likely environmental impacts of a development, together with an assessment of how the severity of the impacts could be reduced. The EIA is prepared by and is the responsibility of the applicant and the resulting documentation is termed an 'Environmental Statement'.

Greenfield site – site previously unaffected by built development.

Greenhouse gases – gases such as methane and carbon dioxide that contribute to climate change.

Groundwater - water held in water-bearing rocks, in pores and fissures underground.

Hazardous waste - waste that may be hazardous to humans and that requires specific and separate provision for dealing with it.

Glossary

In-vessel Composting - is a form of composting biodegradable waste that occurs in enclosed containers. These generally consist of metal tanks or concrete bunkers in which air flow and temperature can be controlled.

Inactive mineral site - Where mineral working has taken place under an extant planning permission but has ceased working for a period of time, e.g. the site has been 'mothballed' for commercial and/or economic reasons.

Incineration – burning of waste at high temperatures under controlled conditions. This results in a reduction bulk and may involve energy reclamation. Produces a burnt residue or 'bottom ash' whilst the chemical treatment of emissions from the burning of the waste produces smaller amounts of 'fly ash'.

Inert waste - waste that does not normally undergo any significant physical, chemical or biological change when deposited at a landfill site. It may include materials such as rock, concrete, brick, sand, soil or certain arisings from road building or maintenance.

Issues and Options – the first formal stage in preparing a Development Plan Document. Identifies and gathers information on key issues, and considers various options for addressing those issues.

Land disposal - Collective term for landfill and landraise.

Landbank - the reserve of unworked minerals, which may be identified or for which planning permission has been granted. Can include dormant sites or currently non-working sites and can be expressed in weight, time or area e.g. 'the operator has a landbank of only 5 years for gravel extraction'.

Landfill– permanent disposal of waste into the ground by the filling of man-made voids or similar features.

Landfill gas – gas generated by the breakdown of biodegradable waste within landfill sites. Consists mainly of methane and carbon dioxide.

Landfill tax – tax charged per tonne of waste disposed of at land disposal sites.

Landraise - disposal of waste material on greenfield sites, resulting in the raising of the ground level.

Local Development Framework (LDF) – suite of Development Plan Documents and other items prepared by district councils and unitary authorities, that together form the spatial planning strategy for the local area.

Local Development Scheme – the programme for the preparation of a planning authority's Development Plan Documents.

Local Plan – part of the statutory development plan that sets out detailed development policies prepared by district and unitary planning authorities. The Planning and Compulsory Purchase Act 2004 requires that this form of plan is replaced by Local Development Frameworks.

Glossary

Localism Bill - Introduced to Parliament on 13 December 2010. The Government intends that this Bill will shift power from central government back into the hands of individuals, communities and councils. The Bill proposes changes to the planning system.

Marine aggregates – aggregates sourced by dredging from the sea bed.

Marine borne material - minerals imported by sea from other areas.

Mineral Consultation Areas - areas of potential mineral resource where district and borough planning authorities should notify the County Council if applications for development come forward. This should prevent mineral resource being lost ('sterilised').

Mineral Safeguarding Areas - areas of known mineral resource that are of sufficient economic or conservation value (such as building stones) to warrant protection for the future.

Mineral Local Plan – a statutory development plan that sets out the policies in relation to minerals within the minerals planning authority (unitary or county council). The Planning and Compulsory Purchase Act 2004 requires that this form of plan is replaced by Local Development Frameworks.

Minerals Planning Authority – the planning authority responsible for planning control of minerals development.

Mitigation measures – actions to prevent, avoid, or minimise the actual or potential adverse affects of a development, plan, or policy.

Municipal Solid Waste (MSW) – waste that is collected by a waste collection authority. The majority is household waste, but also includes waste from municipal parks and gardens, beach cleansing, cleared fly-tipped materials and some commercial waste.

National Park - A protected area designated by Natural England, under the National Parks and Access to the Countryside Act 1949 (as amended). The statutory purposes of National Parks are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and to promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

Natural England - independent public body whose purpose is to protect and improve England's natural environment.

Non-inert waste - Waste that is potentially biodegradable or may undergo any significant physical, chemical or biological change when deposited at a landfill site. Sometimes referred to as 'non-hazardous waste'.

Oil/gas exploration - Following identification by survey of a sub-surface geological feature of interest, the drilling of a borehole to determine firstly whether or not oil and/or gas are present and secondly the likely size of any resources discovered. Drilling is the only known method of determining the presence of oil or gas.

Options Testing Dialogue (OTD) - The process through which the Councils discussed and 'tested' revised waste and minerals issues and options with key stakeholders between September and December 2008.

Glossary

Plan Area - The geographical area covered by this Plan.

Planning permission - formal consent given by the local planning authority to develop and use land.

Primary aggregates – naturally-occurring mineral deposits that are used for the first time.

Ramsar site - wetlands of international importance, designated under the Ramsar Convention, an international agreement signed in Ramsar, Iran, in 1971.

Recovery - obtain value from wastes through one of the following means recycling, composting or energy recovery.

Recycled aggregates - are derived from reprocessing waste arisings from construction and demolition activities (concrete, bricks, tiles), highway maintenance (asphalt planings), excavation and utility operations. Examples include recycled concrete from construction and demolition waste material, spent rail ballast, and recycled asphalt.

Recycling - the processing of waste materials into new products to prevent waste of potentially useful resources. This activity can include the physical sorting of waste which involves separating out certain materials from mixed waste.

Recovery - 'Recovery' refers to waste treatment processes such as anaerobic digestion, energy recovery via direct combustion, gasification, pyrolysis or other technologies. These processes can recover value from waste, for instance by recovering energy or compost, in addition they can reduce the mass of the waste and stabilise it prior to disposal. The definition of recovery set out in the EU Waste Framework Directive applies which states: " 'recovery' means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy."

Residual waste – refers to the material that remains after the process of waste treatment has taken place, that cannot practicably be recycled, composted or recovered any further.

Restoration - methods by which the land is returned to a condition suitable for an agreed after-use following the completion of waste or minerals operations.

Secondary aggregates - recycled material that can be used in place of primary aggregates. Usually a by-product of other industrial processes. Examples include blast furnace slag, steel slag, pulverised-fuel ash (PFA), incinerator bottom ash, furnace bottom ash, recycled glass, slate aggregate, china clay sand, colliery spoil.

Sewage sludge - the semi-solid or liquid residue removed during the treatment of waste water.

Soundness – in accordance with national planning policy, local development documents must be 'soundly' based in terms of their content and the process by which they were produced. They must also be based upon a robust, credible evidence base. There are nine tests of soundness which must be passed in order for a document to be found 'sound'.

Glossary

South East Plan – the Regional Spatial Strategy for the South East region, published in 2009. The Government has indicated its intention to abolish Regional Spatial Strategies through the Localism Bill

Special Area of Conservation (SAC) - designation made under the Habitats Directive to ensure the restoration or maintenance of certain natural habitats or species.

Special Protection Area (SPA) – designation made under the Birds Directive to conserve the habitats of certain threatened species of birds.

Statutory consultee - Organisations with which the local planning authority must consult with on the preparation of plans or in determining a planning application. Include the Environment Agency, Natural England and English Heritage.

Sustainability Appraisal - a tool for appraising policies to ensure they reflect sustainable development objectives. The Planning and Compulsory Purchase Act requires a sustainability appraisal to be undertaken for all development plan documents.

Sustainable Community Strategy – statutory strategy for promoting the economic, social and environmental well-being of the area. Prepared through partnership working between statutory sector providers, the community and voluntary sector, businesses, residents and the local authority.

Sustainable development – various definitions, but in its broadest sense it is about ensuring well-being and quality of life for everyone, now and for generations to come, by meeting social and environmental as well as economic needs

Transfer station - facility where waste is bulked up before being transported to another facility for further processing.

Waste and Minerals Development Framework (WMDF) – suite of Development Plan Documents and other items prepared by Waste and Minerals Planning Authorities, that outline the planning strategy for waste and minerals for the local area.

Waste & Minerals Plan - the DPD that sets out the long-term spatial vision for the area and the strategic policies to deliver that vision.

Waste Collection Authority – district or unitary authority that has a duty to collect household waste.

Waste Disposal Authority – local county or unitary authority responsible for managing the waste collected by the collection authorities, and the provision of household waste recycling centres.

Waste Planning Authority – county or unitary council planning authority responsible for planning control of waste management facilities.

Waste Local Plan - a statutory document that sets out the land-use policies in relation to the management and disposal of waste within the plan area. Local Plans are being replaced by the Development Frameworks introduced through the Planning and Compulsory Purchase Act 2004.

Glossary

Waste water - the water and solids from a community that flow to a sewage treatment plant operated by a water company.

Glossary

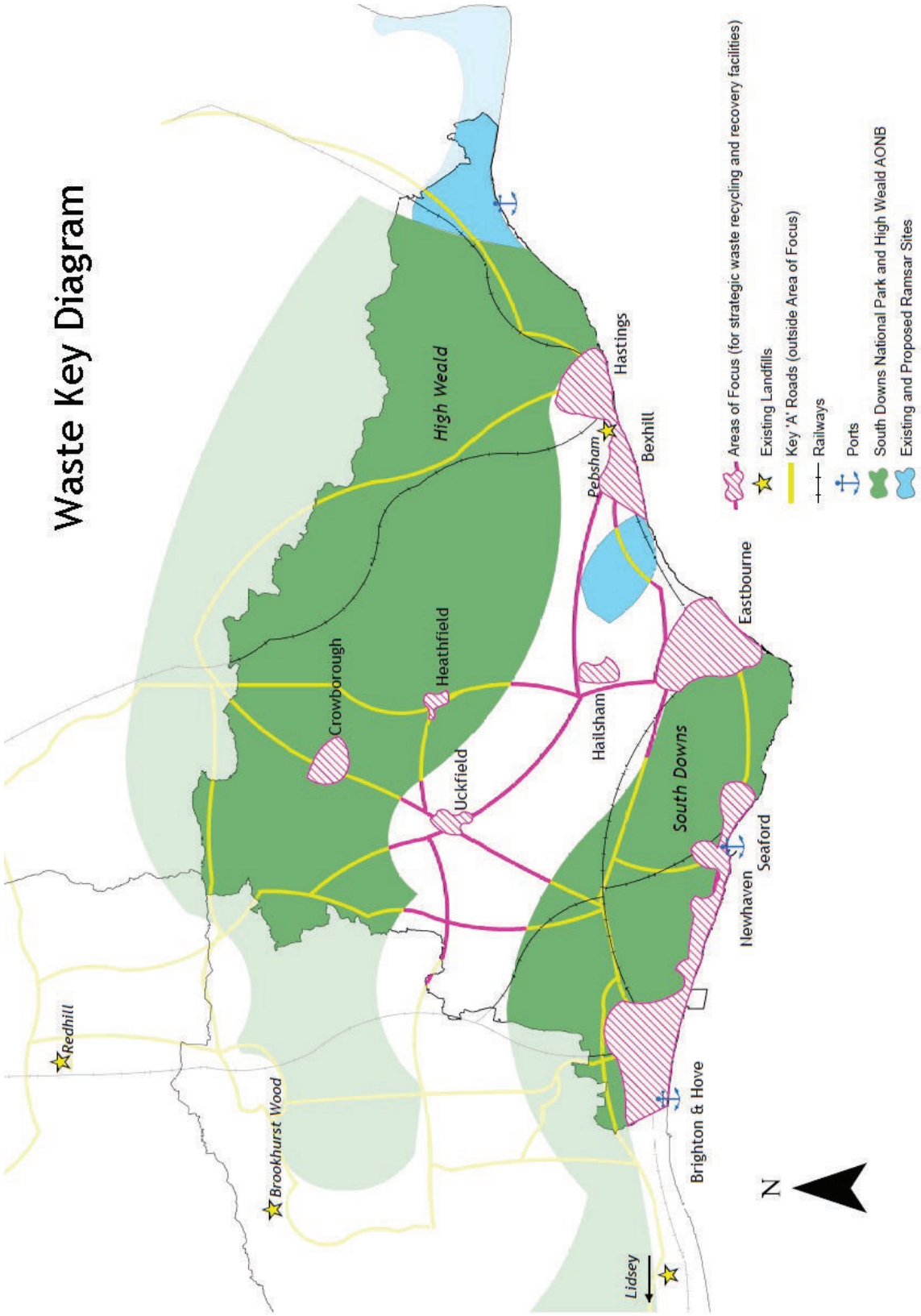
Abbreviations

AD	Anaerobic Digestion
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
CDEW	Construction, Demolition and Excavation waste
C&I	Commercial & Industrial waste
DPD	Development Plan Document
DSG	Desulphogypsum
EA	Environment Agency
EfW	Energy from Waste
EIA	Environmental Impact Assessment
ELV	End of Life Vehicles
ERF	Energy Recovery Facility
HWRS	Household Waste Recycling Site
IVC	In Vessel Composting
LDF	Local Development Framework
LEP	Local Enterprise Partnership
LNR	Local Nature Reserve
LTP	Local Transport Plan
MPA	Minerals Planning Authority
MPS	Minerals Policy Statement
MRF	Materials Recovery Facility
MSW	Municipal Solid Waste
MWDS	Minerals and Waste Development Scheme
NNR	National Nature Reserve
OTD	Options Testing Dialogue
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy

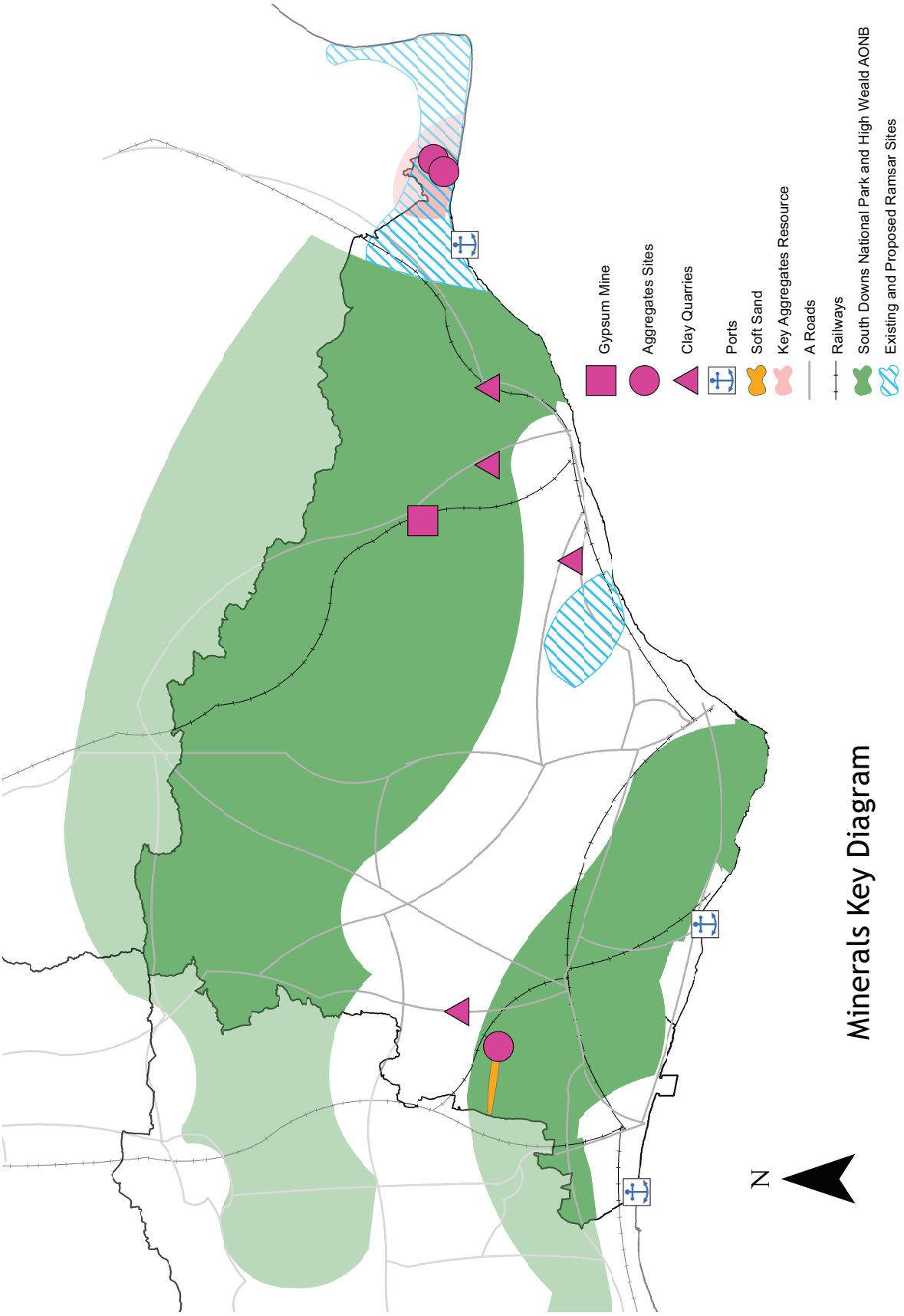
Glossary

SA	Sustainability Appraisal
SAC	Special Area of Conservation
SDNP	South Downs National Park
SSSI	Site of Special Scientific Interest
SPA	Special Protection Area
SPD	Supplementary Planning Document
WCA	Waste Collection Authority
WDA	Waste Disposal Authority
WPA	Waste Planning Authority
WMDF	Waste and Minerals Development Framework
WWTW	Waste Water Treatment Works

Waste Key Diagram

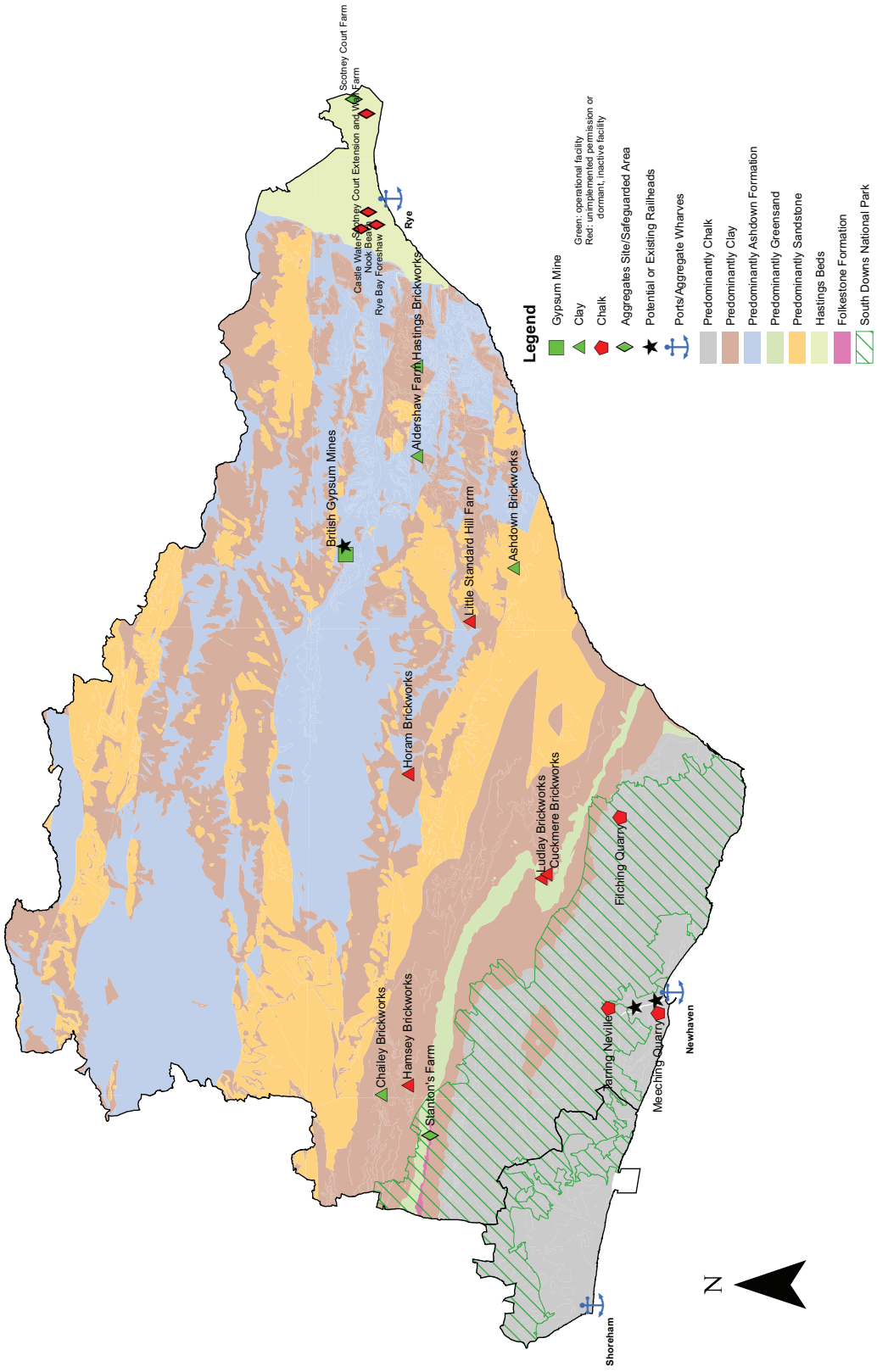


Minerals Key Diagram



Minerals Key Diagram

Simplified Geology of the Plan Area



Tests of Soundness

The Government's Planning Policy Statement 12, 'Local Spatial Planning' defines 'soundness' in relation to core strategies as follows:

"To be "sound" a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

- "Justified" means that the document must be:
- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- deliverable
- flexible
- able to be monitored"

Evidence Base Documents

Information Papers:

- 1. The Future Need for Waste Management
- 2. The Future Need for Minerals Production and Management
- 3. Sustainable Waste Management
- 4. Waste Management Methods and Technologies
- 5. Land Disposal
- 6. Spatial Portrait of East Sussex, Brighton & Hove and the South Downs
- 7. Hazardous and Radioactive Waste
- 8. Transportation of Waste and Minerals
- 9. Climate Change and Waste and Minerals
- 10. Waste Water and Sewage Sludge

Studies and Assessments:

- Sustainability Appraisal
- Waste Minimisation Study
- Waste and Minerals Sustainable Transport Feasibility Study
- Road Transport Implications of Strategic Locations for Waste Facilities, JMP
- Landfill, Landraise and Surcharging in East Sussex, South Downs and Brighton & Hove (Full Version)
- Landfill, Landraise and Surcharging in East Sussex, South Downs and Brighton & Hove (Shortened Version)
- Sustainable Locations for Waste Development – Update of Evidence
- Sites Identification Study, Scott Wilson, 2009
- Review of Future Waste Management Capacity Requirements, AEA
- Assessing the Potential for Heat Capture from Energy From Waste Facilities in East Sussex and Brighton & Hove, Beyond Waste
- Climate Change Study, Eunomia
- Residual Waste from London Study: Draft Report, Scott Wilson
- Low Level Radioactive Waste - Review of The Future Management Needs, URS/Scott Wilson
- Hazardous Waste - Review of The Future Management Needs, URS/Scott Wilson
- Defining Strategic Waste Management Facilities – report
- Equalities Impact Assessment
- Appropriate Assessment, URS/Scott Wilson

Other Documents:

- Responses to the Consultation on the Preferred Strategy document
- Responses to Draft Waste and Minerals Plan

ENVIRONMENT AND COMMUNITY SAFETY OVERVIEW AND SCRUTINY COMMITTEE	Agenda Item 36 Brighton & Hove City Council

Subject:		**Citywide Parking Review**	
Date of Meeting:		**23 January 2012**	
Report of:		**Strategic Director, Place**	
Contact Officer:	**Name:**	**Owen Mcelroy**	**Tel: 293693**
	Email:	**owen.mcelroy@brighton-hove.gov.uk**	
Ward(s) affected:		**All**	

1. PROGRESS TO DATE.

1.1 Consultation letters sent to over a 100 community groups including all 40 Local Action Teams and Tenants' Associations.

1.2 External stakeholders contacted include; emergency services, transport user groups, business organisations and disability groups. Invites have been sent to partnership meetings such as the Strategic Transport Partnership.

1.3 Internal stakeholders contacted, key officers and Trade Unions.

1.4 All 54 ward members contacted.

1.5 Project Board set up and project brief approved

2. RELATED ACTIVITIES:

2.1 Preston Park ECMM report 8th December - summarises current parking problems, the proposals to control the parking, the outcome of consultation and recommends measures to control the parking.

2.2 Parking Tariff review report to Cabinet 9 February 2012, consideration of objections and representations.

2.3 Parking Contract renewal – notice placed in journal of European Union on 10th January, sets out pre qualification criteria

2.4 Current parking review timetable – informal consultation in progress on Richmond Heights (Area C extension) and Canning Street (Area H extension), closes 31st January

3. RESPONSE TO CONSULTATION TO DATE: REQUESTS FOR RESIDENTS PARKING SCHEMES

3.1 Feedback from resident groups so far is that there are parking demand and capacity issues together with a local desire for extensions to controlled parking in Blaker's Park (Preston ward) and in parts of West Hove such as Wish Park and Worcester Villas (Wish Ward).

3.2 Residents in Baker's Bottom (QP Ward) are split between either not wanting resident parking or wishing to be joined to the adjacent Area U light touch scheme.

3.3 Although some parking problems are acknowledged residents in the area north-west of Fiveways and of Bevendean and Hollingdean generally do not want resident parking schemes

4. OTHER ISSUES ARISING FROM CONSULTATION TO DATE AND OFFICER RESPONSE

4.1 Illegal and anti social parking e.g. parking on double yellow lines or obstructive parking and parking around schools. Need for greater enforcement. Response – outside of the CPZs the council operates targeted mobile enforcement and employs reactive enforcement. There is an agreed rota of schools visited each week and officers focus on complaints and regularly change the rota to ensure that all schools are visited. Five minutes observation time must be given on double yellow lines. Penalty charges can only be issued where there is are traffic restrictions and a permitted contravention code.

4.2 Preston Park and Preston Park Avenue. There should be one hour free parking in the park and charges should be reduced in Preston Park Avenue. Response – One hour free parking would result in the scheme being financially unviable. Surplus revenue is reinvested in the Park. Charges in Preston Park Avenue would have to be considered in the context of the overall review

4.3 Provide more car club spaces but remove unused spaces. Response – the council seeks to encourage car club spaces as part of the city's transport strategy of providing options for sustainable transport. Unused spaces can be advertised for removal following consultation.

4.4 Residents generally favourable to the option of cashless/mobile phone parking. Response – under consideration as part of contract renewal

4.5 Issues reported in respect of parking on grass verges and pavements. There have been very mixed responses to this within communities including concerns about displacement if restrictions are imposed. Response - the council recognises that parking on pavements and verges can create a significant obstruction to road users and can cause damage to basement areas therefore it cannot condone parking on pavements. The council has powers to restrict verge and pavement parking in streets or areas but their use would be subject to consultation, resourcing and displacement factors.

4.6 Concerns have been expressed about traffic speeds and there have been request for calming measures. Response – passed to Road Safety Manager as appropriate

5. ISSUES RAISED BY SCRUTINY WORKSHOP 6 DECEMBER 2011- OFFICER RESPONSE:

5.1 Encouraging motorcycle use by providing extra motorcycle spaces and allowing motorcycles to use bus lanes. Response – It is recognised that there is a lack of motorcycle parking in City Centre areas and it is intended to address this, subject to consultation in future revisions to schemes. In new parking schemes at least one bay should be provide per street where site conditions allow. The council is undertaking a study of the implications of allowing motorcycles in Bus Lanes following the petition of the Motorcycle Action Group

5.2 Introducing parking charge holidays. Response – The evidence from other local authorities is that this reduces income but does not increase visitor volumes. It is also in conflict with the promotion of sustainable transport.

5.3 Allowing a trading system for permits. Response – there are legal objections to this as only a council can set charges for permits

5.4 Graduated parking fees according to vehicle dimensions. Response – this is legally possible but could lead to enforcement problems.

5.5 Encouraging cycling with secure spaces for bicycles. Response – additional 'on street' bicycle spaces are being installed this financial year, the council is looking at Lambeth's councils provision of bike boxes for lessons learned

5.6 Transferability of P&D tickets across the City within the same tariff band. Response – there is no provision within traffic orders to prevent this and no contravention code available to issue a PCN. It is not felt that in practice this would result in a significant increase in internal commuting or loss of revenue to the council.

5.7 Further consultation and research is required in respect of paragraph m sub paragraphs a, d, e h, I and k.

5.8 Scrutiny's guidance on the scope of the review set out in paragraph o is agreed and will be incorporated as appropriate.

5.9 It is proposed that the strategic objectives of parking policy align with the Brighton and Hove City Council's Corporate Plan. This describes how the council will help to deliver the vision of the city's Sustainable Community Strategy priorities of; living within environmental limits, and enhancing the environment and providing sustainable transport.

5.10 Specific commitments for 2011/12 include "offering greater choice in how people move around the city… supporting a fairer balance between road users" and "reviewing the effectiveness and impact of current parking schemes on the city for residents businesses and visitors.

5.11 In addition Parking Policy Objectives have been set out in the council's Parking Annual Report 2011 which are to:

- Reduce congestion and keep traffic moving
- Provide access safely to those who need it most
- Deliver excellent customer service

5.12 Available data on vehicle ownership and travel patterns from Census and Personal travel plans is appended to the report and was commented on in the minutes of 8th December Scrutiny Workshop. Generally there is a concern that the data is 10 and 6 years out of date respectively and it would be unsafe to draw conclusions from it.

5.13 Notes of the 6 December 2012 ECSOSC workshop are included in this report at Appendix D.

6. FUTURE MEDIUM TERM TIMETABLE

6.1 The review is still in an early stage and additional research and consultation is required particularly in respect of best practice in other local authorities and elsewhere.

6.2 There is a commitment from officers to visit community groups in Hollingbury, Queen's Park, West Hove, Rottingdean, London Road, Lewes Road and Tarner

6.3 It is proposed to give an interim report to the Cabinet Member for Environment in the Spring.

SUPPORTING DOCUMENTATION

Appendices:

Appendix A Census 2001 Vehicle ownership by ward

Appendix B Census data vehicle ownership

Appendix C Personalised travel plan data report

Appendix D Notes of 6 Dec ECSOSC Informal Workshop; Citywide Parking Review

Background Documents

1. Sustainable Community Strategy

2. Corporate Plan 2011-15

3. Parking Annual Report 2011

Census data	All Households Households	No car or van Households	1 car or van Households	2 cars or vans Households	3 cars or vans Households	4 or more cars Households	Total cars or van Vehicles
Brunswick and Adelaide	5425	2528	2359	482	42	14	3505
Central Hove	5052	2254	2257	466	58	17	3434
East Brighton	6464	3076	2632	634	94	28	4302
Goldsmid	7367	3115	3302	824	99	27	5361
Hangleton and Knoll	5931	1726	2655	1320	193	37	6032
Hanover and Elm Grove	6103	2479	2698	757	137	32	4760
Hollingdean and Stanmer	5029	1908	2084	858	146	33	4381
Moulsecoomb and Bevendean	5598	2001	2501	914	149	33	4915
North Portslade	4159	877	2040	1033	165	44	4830
Patcham	5794	1289	2581	1582	262	80	6894
Preston Park	6141	2090	2951	937	120	43	5375
Queen's Park	7409	4203	2593	508	82	23	3968
Regency	4978	2735	1874	321	43	5	2665
Rottingdean Coastal	5907	1359	2865	1383	236	64	6618
South Portslade	3828	1158	1754	774	116	26	3757
St. Peter's and North Laine	7153	3559	2913	594	70	17	4401
Stanford	3961	561	1651	1379	277	93	5646
Westbourne	4314	1547	1981	677	81	28	3706
Wish	3901	1197	1802	761	111	30	3802
Withdean	6139	1356	2931	1531	248	73	7045
Woodingdean	3825	812	1745	1003	202	63	4636

01-Mar-07

Do we have numerical estimates of vehicle types/traffic modes in the city?

Do we have vehicle ownership and usage mapping relating to different parts of the city? E.g. census/demographic data

Modal trends - what information is available e.g from personalised travel plans & academic studies?

Cars or Vans (1)

All Households	Households	114479
No car or van	Households	41830
1 car or van	Households	50169
2 cars or vans	Households	18738
3 cars or vans	Households	2931
4 or more cars or vans	Households	811
Total cars or vans	Vehicles	100049
	01-Mar-07	

Method of Travel to Work – Resident (2)

All People	Persons	185131
Works mainly at or from home	Persons	10870
Underground, metro, light rail or tram	Persons	202
Train	Persons	9854
Bus, minibus or coach	Persons	14642
Taxi or minicab	Persons	623
Driving a car or van	Persons	50733
Passenger in a car or van	Persons	5730
Motorcycle, scooter or moped	Persons	953
Bicycle	Persons	3168
On foot	Persons	20162
Other	Persons	614
Not currently working	Persons	67580
	18-Nov-04	

Method of Travel to Work - Daytime Population (3)

All People	Persons	179753
Works mainly at or from home	Persons	10870
Underground, metro, light rail or tram	Persons	111
Train	Persons	4800
Bus, minibus or coach	Persons	15578
Taxi or minicab	Persons	633
Driving a car or van	Persons	49716
Passenger in a car or van	Persons	5547
Motorcycle, scooter or moped	Persons	1061
Bicycle	Persons	3188
On foot	Persons	20154
Other	Persons	515
Not currently working	Persons	67580

1

Distance Travelled to Work - Workplace Population (4)

All People Aged 16 to 74 in Employment in Area	Persons	112173
Works mainly at or from home	Persons	17733
Distance travelled to work: Less than 2km	Persons	29842
Distance travelled to work: 2km to less than 5km	Persons	29014
Distance travelled to work: 5km to less than 10km	Persons	14692
Distance travelled to work: 10km to less than 20km	Persons	12229
Distance travelled to work: 20km to less than 30km	Persons	3534
Distance travelled to work: 30km to less than 40km	Persons	1926
Distance travelled to work: 40km to less than 60km	Persons	1067
Distance travelled to work: 60km and over	Persons	2136

Distance Travelled to Work (5)

All People	Persons	117551
Works mainly at or from home	Persons	10870
Less than 2km	Persons	29765
2km to less than 5km	Persons	28567
5km to less than 10km	Persons	11690
10km to less than 20km	Persons	9476
20km to less than 30km	Persons	2939
30km to less than 40km	Persons	5581
40km to less than 60km	Persons	2130
60km and over	Persons	9298
No fixed place of work	Persons	6863
Working outside the UK	Persons	299

(1)

The table shows all households by whether there are any cars or vans owned or available to the household, and if so how many. It also includes a total count of cars or vans in the area.
The number of cars or vans available for use, by one or more members of a household includes company cars and vans available for private use.
The count of cars or vans in an area is based on details for private households only. Cars or vans used by residents of communal establishments are not counted.
The population of this table is all households.

(2)
The table shows the usual resident population aged 16 to 74 by the method of travel to work. Those people not currently working are shown separately.
The method of travel to work is for the longest part, by distance, of the usual journey to work.
The population of this table is the usual resident population aged 16 to 74.

(3) The day-time population is defined for people aged 16 to 74, as those people who live and work in the area (or do not work) and those people who live outside the area and work inside the area. 'No fixed place of work' is counted as if working in the area. The

(4)
The workplace population is defined as the people aged 16 to 74 who are in employment and whose usual place of work is in the area. People with no fixed place of work are treated the same as people who work mainly at or from home and are counted as working in their area of residence.
The distance travelled to work is measured in kilometres of a straight line between the residence postcode and the workplace postcode. It is not calculated for people working mainly at or from home, people with no fixed workplace, people working on an offshore installation or people working outside the UK.
The population of this table is all people aged 16 to 74 in employment in area

(5)
The distance travelled to work is measured in kilometres of a straight line between the residence postcode and the workplace postcode.
It is not calculated for people working mainly at or from home, people with no fixed workplace, people working on an offshore installation, or people working outside the UK.
The population of this table is all people aged 16 to 74 in employment.

Year on year Personalised Travel Planning Summary
Areas 1 to 5
2006/7 – 2009/10

Objectives

To demonstrate that 'soft measures' are an effective tool in securing behavioural change.
In this instance- that the deployment of trained travel advisors can provide residents with a comprehensive range of travel information so enabling them to make informed decisions and increase their personal use of sustainable modes travel.

Approach

In order to measure change the same approach was used in each area.

- baseline survey in the area in order to establish patterns of travel behaviour
- Implement an intervention programme in the area
- Re-survey the area, a year on from the start of the programme, in order to determine whether travel behaviour has changed since intervention

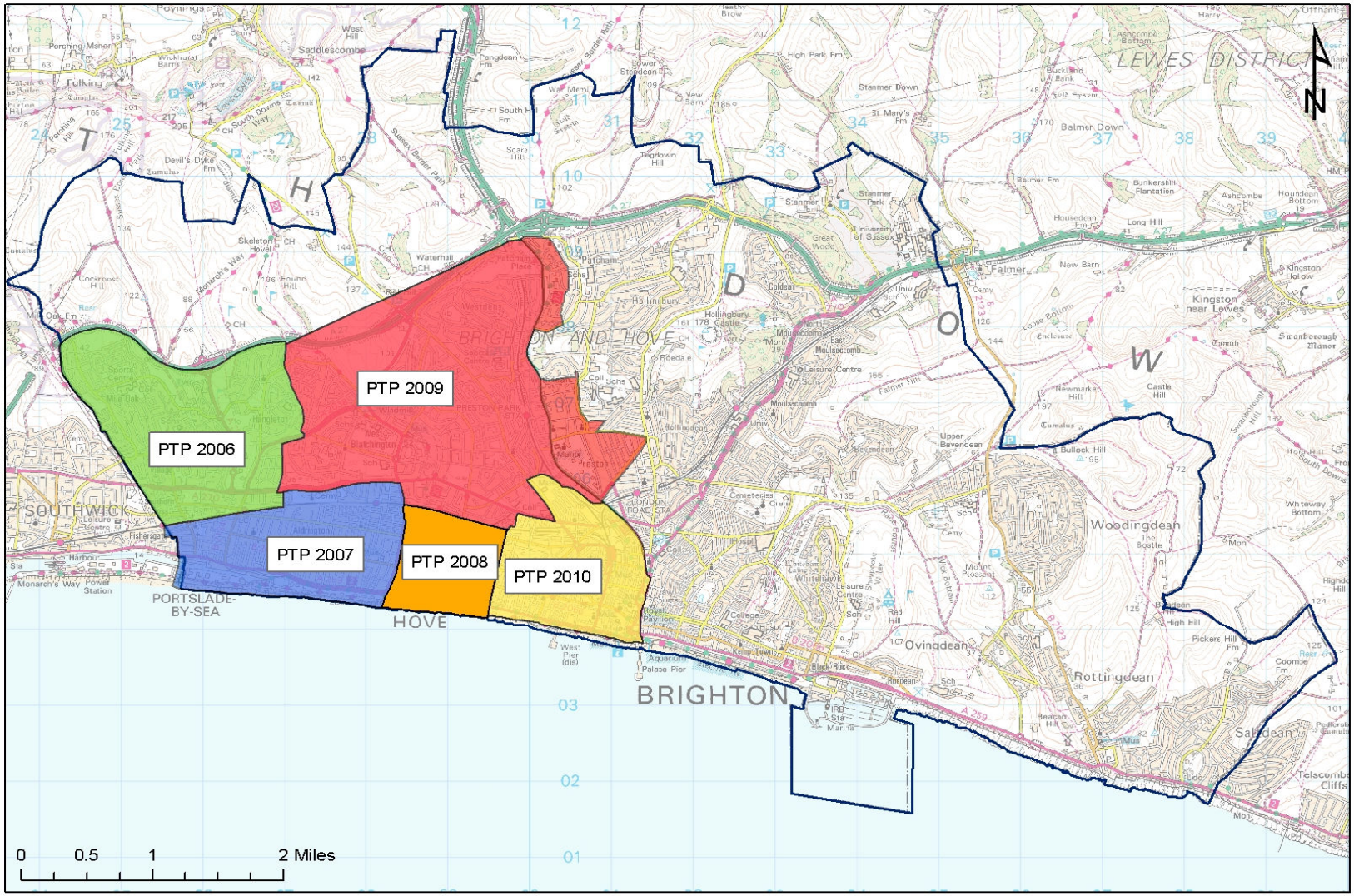
Methodology

Residents in the selected area were interviewed on the doorstep of their homes, with the questionnaire collecting data on:

1. A travelogue of journeys undertaken the previous day
2. Respondents use of, and attitudes towards, car and bicycles
3. Monitoring Information and profiling of respondents

Doorstep interviews were conducted across all days of the week and at various times of day to ensure a full balance of activities could be tracked.
Maximum sample size was 2000 – Minimum sample size was 1000

PTP Areas 2006 to 2010



Survey Figures numbers for each area

PTP Area	No. of households			
	Baseline Survey	**Post-intervention survey**	**PTP area**	**% of household surveyed**
PTP1 2006-07 Portslade and Hangleton	1968	1990	10,000	20%
PTP2 2007-08 Stanford and Central Hove	2145	1917	12,000	16%
PTP3 2008-09 Wish and Westbourne	1106	1000	4000	25%
PTP4 2009-10 Withdean and Preston Park	1004	1041	16000	6%
PTP5 2010-11 Central/ 7 Dials/ Old Steine	1998	2000	16500	12.5%

In total over 5 year the PTP initiative has knocked on 58500 doors - approximately half of the households in the City. But there are quite wide variations from area to area in either the number of households that form an area or in the sample surveyed.
Most significantly Area 4, which increased the households included and decreased the sample surveyed. There are further reasons around this: over this area the project was part funded by Civitas and an additional emphasis on social media/marketing was tried during this year (this work is documented elsewhere).

Headline Yearly Results for each area

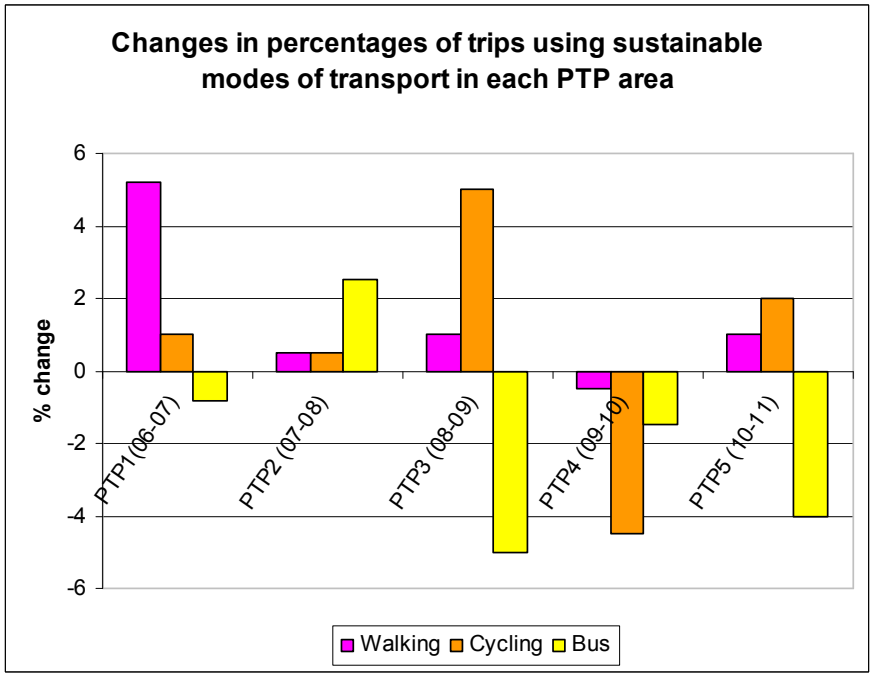
Number of Trips	PTP 1		PTP 2		PTP3		PTP 4		PTP5	
	2006	2007	2007	2008	2008	2009	2009	2010	2010	2011
Walking	554 (13.5%)	769 (18.7%)	1656 (29%)	1209 (29.5%)	800 (34%)	751 (35%)	862 (35%)	830 (34.5)	2549 (48%)	2421 (49%)
	↑	+5.2%	↑	+0.5%	↑	+1%	↓	-0.5%	↑	+1%
Cycling	37 (1%)	82 (2%)	322 (5.5%)	253 (6%)	171 (7.5%)	265 (12.5%)	260 (10.5%)	149 (6%)	420 (8%)	492 (10%)
	↑	+1%	↑	+0.5%	↑	+5%	↓	-4.5%	↑	+2%
Bus	649 (15.9%)	622 (15.1%)	775 (13.5%)	660 (16%)	470 (20%)	322 (15%)	302 (12%)	261 (10.5%)	670 (13%)	441 (9%)
	↓	-0.8%	↑	+2.5%	↓	-5%	↓	-1.5%	↓	-4%
Car as a driver	2,198 (54%)	2,065 (50%)	2,355 (41%)	1,498 (36%)	541 (23%)	480 (22.5%)	653 (26.5%)	788 (32.5%)	881 (16.5%)	785 (16%)
	↓	-4%	↓	-5%	↓	-0.5%	↑	+6%	↓	-0.5%
Car as a passenger	414 (10%)	297 (7%)	245 (4.5%)	201 (5%)	129 (5.5%)	119 (5.5%)	168 (7%)	185 (32.5%)	313 (6%)	294 (6%)
	↓	-3%	↑	+0.5%	↓	-	↑	+0.5%	↓	-
Driver and Passenger	2,612 (64%)	2,362 (57%)	2,600 (45.5%)	1,699 (41%)	670 (28.5%)	599 (28%)	821 (33.5%)	973 (40%)	1194 (22.5%)	1079 (22%)
	↓	-7%	↓	-4.5%	↓	-0.5%	↓	+6.5%	↓	-0.5%

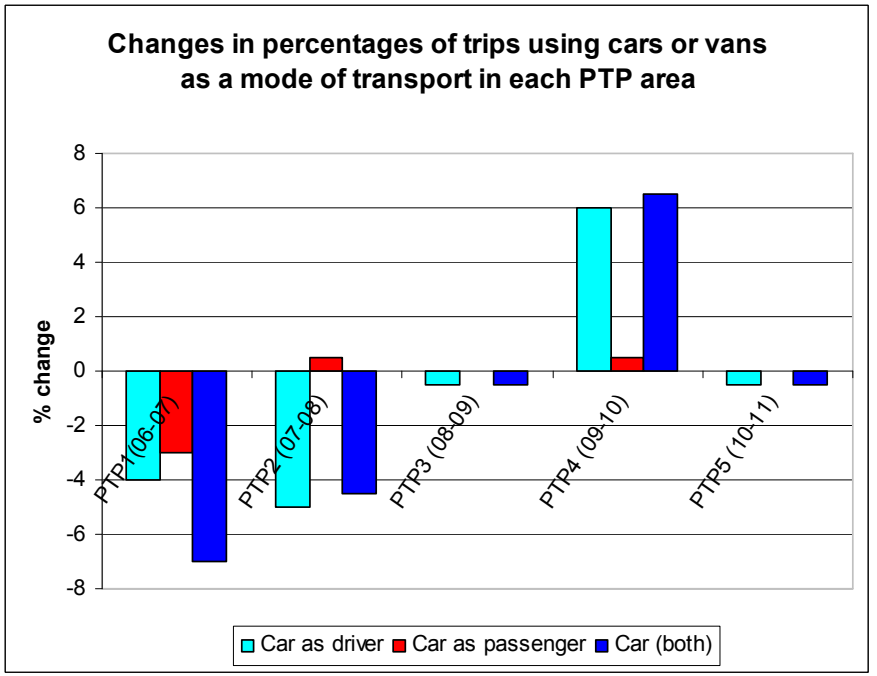
Walking and Cycling: In all but the PTP4 area walking journeys increased.

Bus: The only PTP area which showed an increase in the percentage of journeys was in the PTP2 Area Stanford and Central Hove. This is possibly the most ill fitting information as Bus journeys have increased 27% (from 30 million – 40 million) over the last 11 years (2001 – 2010) across the city

Car Use: In all but the PTP4 area, car journeys decreased.

The changes in transport modes for each area are shown in two graphs below, one showing shifts in sustainable modes and the other shows changes for car users. These graphs show quite clearly that shifts to more sustainable modes after the intervention programme were more obvious in PTP1 and 3 and shifts to less sustainable modes was more likely to happen in PTP4 area.

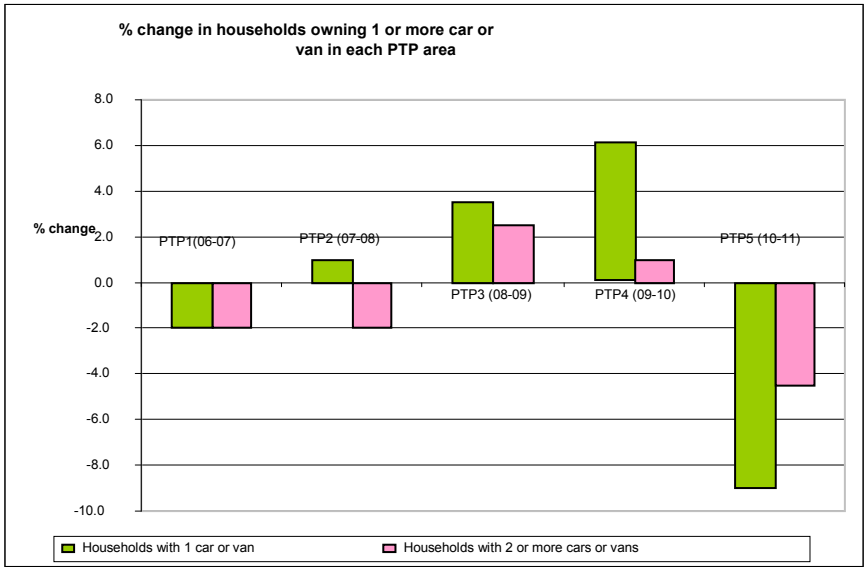


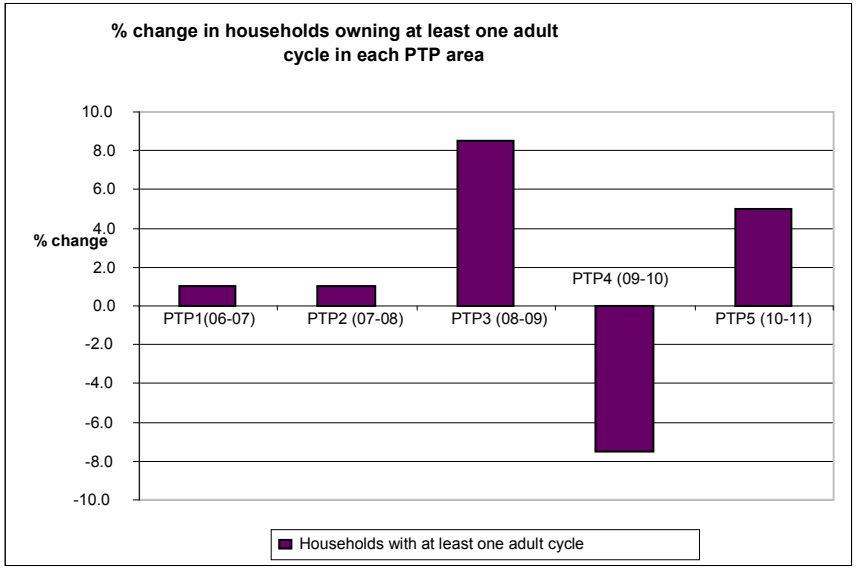


Rates of car ownership also show a trend towards car use in the PTP 4 area with 77% households owning at least one car in 2009 rising to 83% in 2010. Areas showing decreased car ownership were PTP1 and PTP5 areas.

	PTP1		PTP2		PTP3		PTP4		PTP5	
	2006	2007	2007	2008	2008	2009	2009	2010	2009	2010
No cars	21%	23%	29%	28%	45.5%	42%	33%	27%	43%	52%
		+2%		-1%		-3.5%		-6%		+9%
Two or more cars	31%	29%	25.5%	23.5%	12.5%	15%	19%	20%	13%	8.5%
		-2%		-2%		+2.5%		+1%		-4.5%
Cycle Ownership[1]	38%	39%	50%	51%	44%	52.5%	60%	52.5%	51.5%	56.5%
		+1%		+1%		+8.5%		-7.5%		+5%

Cycle ownership has increased in each area from the baseline survey to the follow-up a year later, apart from in the PTP4 area where cycle ownership has dropped by 7.5%. % change in vehicle ownership is shown in the graphs below:



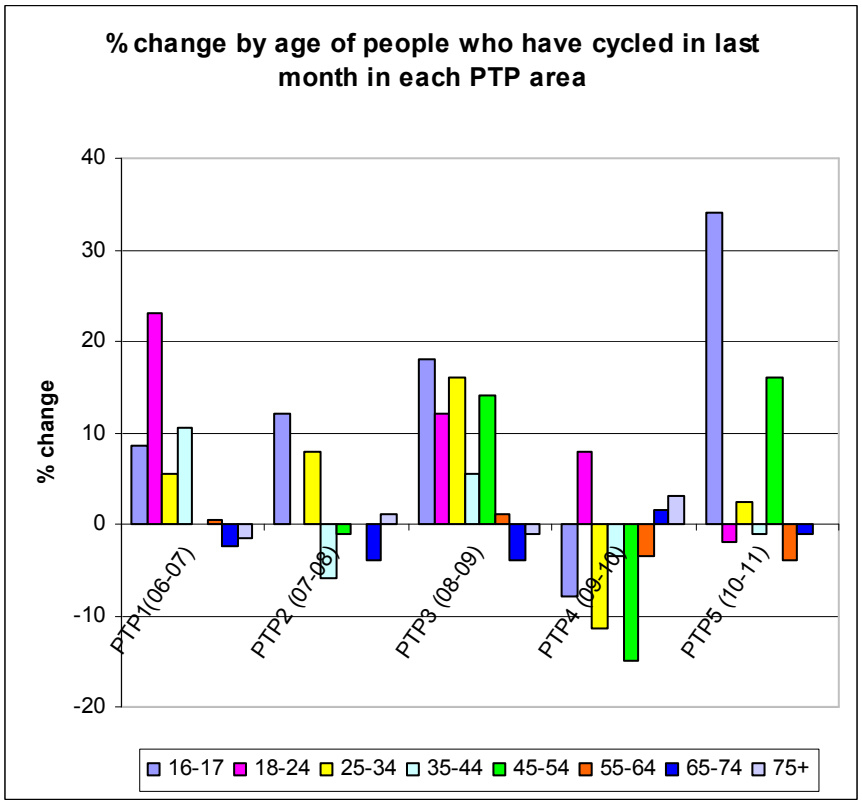


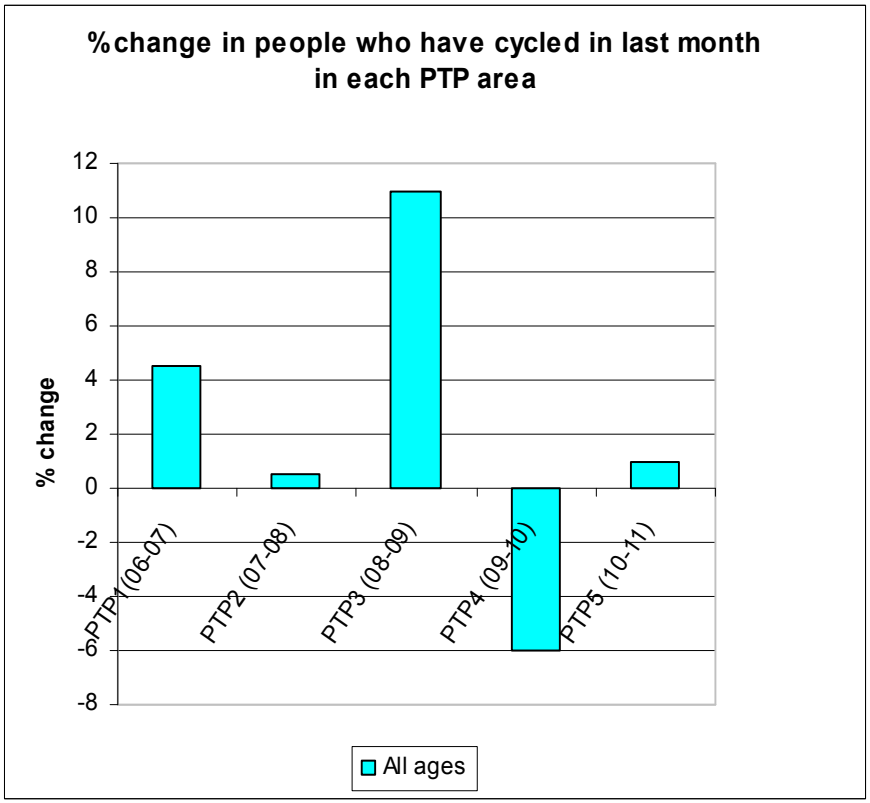
[1] At least one per household

Cycling: Number of respondents who had cycled in the previous month:

	PTP 1		PTP 2		PTP3		PTP4		PTP5	
Age	**2006**	**2007**	**2007**	**2008**	**2008**	**2009**	**2009**	**2010**	**2010**	**2011**
16-17	9 (31%)	13 (39.5%)	6 (24%)	10 (36%)	9 (32%)	5 (50%)	12 (63%)	9 (55%)	11 (41%)	12 (75%)
		+8.5%		+12%		+18%		-8%		+34%
18-24	18 (22%)	44 (45%)	37 (37%)	41 (37%)	28 (31%)	52 (43%)	45 (40%)	36 (48%)	126 (47%)	127 (45%)
		+23%		/		+12%		+8%		-2%
25-34	38 (15%)	41 (20.5%)	112 (35%)	121 (43%)	85 (36%)	122 (52%)	98 (50%)	48 (38.5%)	162 (37%)	192 (39.5%)
		+5.5%		+8%		+16%		-11.5%		+2.5%
35-44	62 (16.5%)	103 (26%)	219 (41%)	179 (35%)	90 (37.5%)	115 (43%)	115 (43%)	103 (39.5%)	185 (37%)	211 (36%)
		+10.5%		-6%		+5.5%		-3.5%		-1%
45-54	28 (19.5%)	54 (19.5%)	99 (30%)	81 (29%)	23 (23%)	40 (37%)	35 (43%)	48 (28%)	68 (24%)	58 (40%)
		/		-1%		+14%		-15%		+16%
55-64	21 (7.5%)	25 (8%)	50 (18%)	40 (18%)	11 (11%)	8 (12%)	15 (18%)	20 (14.5%)	18 (12%)	12 (8%)
		+0.5%		/		+1%		-3.5%		-4%
65-74	19 (5.5%)	9 (3%)	18 (8%)	8 (4%)	8 (7%)	3 (3%)	4 (4%)	7 (5.5%)	4 (2.5%)	2 (1.5%)
		-2.5%		-4%		-4%		+1.5%		-1%
75+	5 (2%)	2 (0.5%)	7 (2%)	7 (3%)	3 (2%)	1 (1%)	1 (1%)	5 (4%)	0 (0%)	0 (0%)
		-1.5%		+1%		-1%		+3%		0
Overall	200 (10%)	292 (14.5%)	548 (25.5%)	488 (26%)	257 (24%)	346 (35%)	325 (33%)	276 (27%)	574 (29%)	603 (30%)
		+4.5%		+0.5%		+11%		-6%		+1%

Percentage change people who have cycled in last month for each area:





The number of respondents who had cycled in the previous month has increased in each area from the baseline survey to the follow-up a year later, apart from in PTP4 Withdean and Preston Park area where a lower percentage of people have cycled in the last month, although looking at the breakdown by age for this area we can see that there have been increases over 5% in the 18-24 age group and slight increases in people aged 65 and over. The largest increases in rates of cycling within the last month have generally been for people aged 34 and under. The table overleaf shows peoples' attitudes towards cycling.

Barriers to cycling	PTP1		PTP2		PTP3		PTP4		PTP5	
	2006	2007	2007	2008	2008	2009	2009	2010	2010	2011
Noticed improvements in cycling in B&H over last 12 months		27%		38%		40%		42%		16%
Have you cycled in the last month?										
Yes	200 (10%)	292 (14.5%)	548 (25.5%)	488 (26%)	257 (24%)	346 (35%)	325 (33%)	276 (27%)	574 (29%)	603 (30%)
		+4.5%		+0.5%		+11%		-6%		+1%
No	1756 (89.5%)	1698 (85%)	1588 (74%)	1375 (74%)	826 (76%)	649 (65%)	664 (67%)	759 (75%)	1412 (71%)	1242 (62%)
		-4.5%		0%		-11%		+8%		-9%
Would you consider cycling?										
		22%		8%		47%		33.5%		40%
If you had cycled in last month – what would encourage you to cycle more?										
• More cycle lanes		26.5%		23.5%		35.5%		20.5%		18%
• More cyclist awareness by drivers		17.5%		14%		25%		18.5%		10%
• Nothing		17%		17%		-		-		40%
• Secure parking		-		-		25%		11%		10%
If you have not cycled in the last month what would encourage you to cycle more:										
• Other		25%		-		-		-		-
• Cycle lanes		18.5%		16.5%		28.5%		17%		25%
• Owning a bike		18%		20%		56.5%		15%		75%
• More cyclist awareness by drivers		13.5%		9.5%		22%		13%		-
• Info on safer/ easier routes		-		7.5%		20.5%		-		-
• Secure parking		-		-		-		7%		-

The percentage of people noticing improvements to cycling facilities in the city has increased year on year since the PTP programme started and also that - whether or not people have cycled in the last month - they are citing the same things that would encourage them to cycle more: a request for **more cycle lanes** and **more cyclist awareness by drivers** and these things are common to all PTP areas.

Summary

Overall each target area on the PTP initiatives have shown a shift from the baseline in favour of sustainable modes, with the exception of area 4, where in total strangely more resources and emphasis were used.

But the unknown elements of PTP does leave it open to question. Not checks & balances were put in place. – for instance if a control group had been run in another area of the city where travel advisors were not working, it would have been useful to see if a shift towards sustainable modes was occurring without intervention and was part of a bigger picture (rising fuel, recession , etc).

Additionally we have never revisited any of the previous areas to check & see if the shift has either been sustained, increased or infact decreased.

ECSOSC Informal Workshop: Citywide Parking Review
4pm Tuesday 6 December 2011. Kings House R122

Present: Councillors Warren Morgan (Chair) Ollie Sykes (Deputy Chair), Leo Littman, Denise Cobb, Tony Janio and Anne Pissaridou (sub)

a) Councillor Warren Morgan, ECSOSC Chair welcomed everyone to the second workshop on the citywide parking review and referred to the Project Manager Owen McElroy's (OM) update.

b) Councillor Morgan was concerned that the Parking Tariff Review as agreed by 29 November 2011 CMM was a significant policy change. The decision impacted on the work of this scrutiny workshop and should have been a part of the citywide parking review. It may cause unintended consequences but scrutiny had no opportunity to comment on it. Members generally agreed that the workshop was expecting to work more in tandem with the development of the administration's emerging review of parking policy. This would be raised with the Cabinet Member.

c) OM noted the main issues from the first workshop, and initial proposals for consultation or development regarding these. Workplace parking levies were being looked at; however a suitable number of parking places had to be available in the right places to enable this approach, he added.

d) Councillor Cobb was disappointed that her idea at the first workshop for a citywide parking scheme did not seem to have been fully followed up. The workshop asked that the citywide parking review include scope for completely new ideas rather than merely adapting existing provision. *[Councillor Cobb's suggestion has been circulated and Councillor Cobb has received an officer reply]*

e) OM set out plans for the consultation on the citywide parking review. Visits to LATs were being arranged as listed and Community Engagement training had provided new ideas and information on methods and groups for consultation. Some areas of the City were under-represented at present as regards engagement with their LATs on the parking review and **Members were asked to contact OM with suggestions for consultations with LATs and other interested groups.**

f) Asked for more information on the consultation process, OM said LATs and community groups were being involved, also Ward Members, disability groups, officers and other external stakeholders. There would be a press release and development of a web page plus a postal questionnaire during the summer for which officers were being advised on the timing and notice period, and the timetable for receiving and analysing responses. The questions asked, the design and extent of the questionnaire would be key. For general opinions, randomised samples could be used but for consultation on a specific scheme, all households would need to receive a questionnaire. The potential for displacement parking was now included in all parking consultations.

g) All Ward Councillors would be asked to provide a list of consultee organisations if they wished, from now until the end of March 2012.

h) (The web-based consultation on cumulative impact licensing area was described by a Member as difficult to use/navigate, so that some would-be respondents gave up and did

not reply.)

i) Members asked questions. (**Further information provided in brackets)**

- what is the legal position on parking penalty charges in instances when the 'correct' fee has been paid, albeit for a different zone of the City.

(The traffic order has a definition of a tariff area and stipulates that a ticket purchased in one tariff area cannot be used in another tariff area. CEOs are trained to look for this. However there is nothing in the traffic order to prevent transferability within the same tariff zone e.g. buying a ticket in a low tariff street in Area R and then using it in another low tariff street e.g. in Area H. This is not widely known by the public or even by officers.)

- what is the tendering timetable and process for the parking enforcement contract currently with NSL.

(This is set out set out on the minutes of Cabinet 8 December 2011 Agenda item 147 para 3.10:

OJEU Placed	Jan 2012
Evaluate PQQs	March 2012
Invitation to Tender sent out	April 2012
Evaluation of Tenders	May / June 2012
Award Contract	August 2012
Mobilisation	August – December 2012
Contract Start	1st January 2013

- are parking permits available for family carers, as well as professional carers?

(Parking permits are available for family carers. These are called carers permits. We could also issue these to friends who care for someone within the CPZ.

Terms of issue: A 'Carers' permit can be applied for if a 'carer' has to visit a resident or residents who need to be cared for by virtue of age, physical or mental infirmity, as well as women requiring antenatal and/or postnatal care. Please answer the following questions so that we can assess whether you are eligible for a Carers Permit.

The GP of the person being cared for needs to sign a declaration stating:

"I confirm the person named and living at the address in section D is suffering from physical and/or mental infirmity or having ante- and/or post natal treatment, and is assisted by a Carer.")

j) Contact officers Paul Nichols and Austen Hunter can provide more detailed information on current transport operations and the tendering process for the parking enforcement contract. (phone numbers 29 - 2245 and 29 - 3287)

k) The workshop discussed how 'internal' commuting by car could best be reduced and asked for more information on the 'demographics' of car ownership and usage, the current

allocation criteria for resident permits and the definition of a household in relation to this. It was thought likely that residents would be influenced in where they live by the availability/cost of parking; reduced car ownership in the City centre could potentially result in additional pressure on car parking spaces in the suburbs.

(Attached are statistical reports of car ownership/demographical information taken from the 2001 census and the report on Personalised Travel Planning (PTP) data from the West of the City 2006- 10. The census data is broken down into wards; note that the census data is now ten years out of date.

(The PTP data shows that rates of car ownership and usage have been in decline in the West of the City except the Withdean and Preston Park area and the Wish and Westbourne areas. However the data must be treated with caution as the return rates varied between the areas and no control group was used for comparison. This data is also up to six years old.)

l) Members noted that maximum vehicle height restrictions means that small businesses' vans had to park outside parking zones to avoid blocking ground floor windows. This reduced the take-up of permits, and increased displacement. Parking displacement of any kind was difficult to avoid.

m) The workshop suggested ideas for consideration as part of the citywide parking consultation:

a) Removing all parking zones altogether
b) Encouraging motorcycles actively eg by providing extra motorcycle parking spaces, allowing motorcycles to use bus lanes
c) Introducing parking charge 'holidays'
d) Enabling permits to be purchased for neighbouring zones especially where take-up of resident permits was lower than anticipated; (this was unlikely to be feasible and may open the Council to Ombudsman challenge. **(see note below*)** A trial was being proposed in Zones M and N
e) Re-visiting the merits and disadvantages of 'light touch' parking schemes
f) Allowing a trading system for parking permits, with the number of permits available being reduced year by year.
g) Graduated parking fees according to vehicle dimensions/characteristics (allowing for a lead-in time to encourage changes in patterns of vehicle purchasing)
h) Introducing transferable vehicle permits for use by small garages in residential areas
i) Underground parking
j) Encouraging cycling with secure spaces for bicycles
k) Supporting businesses and taking account of the night-time economy as well as daytime business hours

n) The Chair Councillor Warren Morgan thanked colleagues and officers and summarised the key issues from the workshop for the consultation, to feed back to Cabinet Member. Engagement with the public, including carers' groups, was key and the timetable for the citywide parking review and implementation needed to be clear.

o) Would like the consultation on the citywide parking review from the starting point, to

- Be clear on the strategic objectives of parking policy in the City
- be 'open' to encourage completely new innovative ideas from all stakeholders
- summarise the current parking problems including numerical estimates of the various users and stakeholders (eg census/demographic data, vehicle ownership and usage mapping relating to different parts of the City, trends in journeys, tourist information, use of the transport model, matching with public transport information, personal travel plans, results of NSL surveys and academic studies. Also hotspots eg hospitals, doctors, schools)
- consider how parking/car usage trends in different parts of the City may change over time eg if car use shifts significantly from the city centre towards the suburbs
- give due attention to disabled parking
- describe best practice elsewhere
- review the effects of the 'light-touch' approach, based on experience here and elsewhere
- investigate workplace parking levies

(*There is concern that allowing permits to households that do not have waiting restrictions in front of their house outside of parking schemes could open the floodgates to other roads throughout the city that are on the edge of parking zones asking for permits. Residents throughout Brighton & Hove on the edge of parking schemes could argue that if we allow residents that do not have waiting restrictions in front of their house and who do not live within a scheme to be issued permits, then the City Council will have established a precedent and their road too should also get resident permits.

(It is arguable that this could lead to residents within a parking scheme throughout Brighton & Hove making complaints that those residents who do not have parking restrictions within their area are parking within the parking scheme.

(There had been a recent complaint from a resident which had got to Ombudsman stage and the ombudsman ruled that there was no maladministration in the council's current policy in this respect.)

Environment and Community Safety Overview and Scrutiny Committee
Draft Work Plan 2011- 2012

Issue	Overview & Scrutiny Activity	Outcome & Monitoring/Dates
31 October 2011		
Monitoring Scrutiny review: 20mph Speed Limits/zones	Tracking action on completed scrutiny reviews; determine whether a further monitoring report is needed	Further update requested, with invitation to Cabinet Member
Council-supported bus services	For Scrutiny comment	Further information requested
Monitoring Scrutiny reviews: Support Services for Victims of Sexual Violence and Older People and Community Safety	Tracking action on completed scrutiny reviews; determine whether a further monitoring report is needed	Further updates requested including case studies
Scrutiny of Crime and Disorder; Police and Crime Commissioners	To consider proposals	Officers asked to bring forward proposals

23 January 2012		
Taxis update. Invite Chair of Licensing Committee	Reply to 5 September scrutiny request	
Waste Strategy	Member debate	
Waste and Minerals Plan	Council Framework Document to Scrutiny	
Report on Citywide Parking Review	Monitoring citywide parking review	

7th March 2012 (instead of meeting originally scheduled for 26 March 2012)		
Review of Travellers Strategy	to consider Scrutiny panel report for endorsement	
Renewable Energy Potential	Monitoring implementation of the scrutiny recommendations	
Street lighting	Update for Members	
Official Feed and Food Controls Service Plan 2012-2013	Council Framework Document to Scrutiny	
Health and Safety Annual Service Plan 2012-13	Council Framework Document to scrutiny	
Monitoring Winter Service Plan, if needed		