

Ref: RDB/PM/BD/07.10.14

22nd October 2014

Councillor Bob Derbyshire,  
Cabinet Member for the Environment,  
County Hall,  
Atlantic Wharf,  
Cardiff,  
CF10 4UW.



Dear Councillor Derbyshire,

**Environmental Scrutiny Committee – 7<sup>th</sup> October 2014**

On behalf of the Environmental Scrutiny Committee I would like to thank you and the officers for attending the Committee meeting on Tuesday 7<sup>th</sup> October 2014. As you are aware the meeting considered items titled 'Outline Waste Management Strategy 2015 - 2018' and 'Organic Waste Treatment Solution – Procurement Update'. The comments and observations made by Members following this item are set out in this letter.

**Outline Waste Management Strategy 2015 – 2018**

The Committee are very concerned at the very high recycling and compost targets set by the Welsh Government. The long term target of 70% for 2024/25 and short term target of 58% for 2015/16 are exceptionally high and pose significant challenges for the Council; particularly in light of the current financial challenges. Members described the predicament that the Council faces as “being stuck between a rock and a hard place”. Solving such a challenge will be exceptionally expensive at a time when the Environment budget faces significant cuts. The prospect of £200 per tonne fines for failure to meet recycling targets and potential loss of the waste management grant merely add to the headache.

The Members pointed out that such targets could be achieved in the more affluent areas of Cardiff; however, they were completely unrealistic for the inner city areas. They found it frustrating that we are trying to recycle things like road sweepings and litter bins which contain dog waste just to meet

targets. Members would, therefore, ask you to pass on the comments of the Committee to the Welsh Government, i.e. that they believe that the exceptionally high targets set by the Welsh Government cannot be achieved in Cardiff.

Members agreed that in theory the move to a kerbside sort strategy was a good idea; however, Cardiff is far from an ideal place to implement such an approach. They cited a number of reasons for this view, these included:

- Cardiff has the most transient population in Wales. Implementing a more complicated kerbside sort system will mean that increased resources would need to be put into ongoing waste education and enforcement - without any guarantee of increased recycling rates.
- Kerbside sort vehicles take longer to load than traditional waste refuse lorries and are, therefore, more likely to create traffic congestion on the streets of Cardiff. The vehicles also create health and safety issues for staff who have to load recycled materials into the various compartments – the risk applies to both single and double side loading.
- Much of the housing stock in central Cardiff consists of flats and on street terraced housing. Both types of housing stock make the kerbside sort system difficult to implement as the collection and storage of boxes takes up more floor space than the comingled alternative.
- The areas with the highest recycling rates are in the north of Cardiff when the bulking stations for storage of recyclate are in the south of the city; the south of the city has the lowest recycling rates. Members are concerned that the new kerbside sort vehicles will have smaller compactors than the traditional waste refuse lorries and; therefore, will fill up far quicker. This will mean that more journeys will be required across the city which will contribute to traffic congestion; Cardiff's carbon footprint will increase and collection times will be longer making the system more inefficient. Such factors should be built into the evaluation model when determining the best way forward for the Waste Management Strategy.

The Committee were disappointed that 70% of residents who took part in the consultation exercise were in favour of a comingled system; only 4% were in favour of kerbside sort using separate boxes. This worried Members as a key element of getting a kerbside sort system to work correctly is the willingness of residents to participate properly. The consultation data suggests that many of Cardiff's residents would be reluctant participants, however, other cities have implemented such schemes and residents have adapted to the change over time.

Members noted that the introduction of smaller bins had managed to increase recycling rates in some local authority areas (for example, Monmouthshire), however, the Committee were not convinced that such a change would necessarily work in Cardiff. The examples cited are often for more affluent rural areas which are very different from Cardiff's urban setting.

The Committee were very concerned that approximately a third of Cardiff's households were not effectively engaging in the recycling process. Members felt that targeted action should be directed at this group to help increase Cardiff's recycling rate. Education and support should be the basis of the initial efforts to increase the recycling rate of this group; however, if this approach fails then it should be followed by enforcement action.

Members felt that having one standardised waste collection scheme for Cardiff was not the best way forward. They understood that having a simple system that was easy for everyone to follow was important (74% of the consultation participants agreed with this), however, the recycling differences between certain areas are so significant that tailored solutions to meet specific needs are essential. The Committee feel that there is merit in building this type of approach into the Waste Management Strategy.

The Welsh Government has requested a copy of the draft Outline Waste Management Strategy 2015 – 2018 by January 2015. Members are puzzled at this as the Welsh Government has yet to disclose how it plans to operate the TEEP (Technically, Environmentally, Economically, Practicable) criteria. The way in which TEEP is operated will ultimately impact on how waste

management strategies are constructed – the prospect of not having this information makes it difficult for the Council to develop an appropriate waste management strategy.

Members fear that any future changes to the Waste Management Strategy could have a negative impact on any potential contractual arrangements with an alternative delivery model provider. For example, if a service specification, contract or service level agreement is agreed with a third party to provide waste management then a forced change of delivery model could potentially compromise such agreements. Ultimately such contractual arrangements could be very expensive to adjust. The Committee feel that agreeing the Outline Waste Management Strategy 2015 to 2018 in advance of developing a specification with an alternative delivery model provider was essential. If this is not possible then the Council should consider some kind of interim contract for waste collection services to cover the period of uncertainty.

The Committee were told that some comparative analysis has been carried on how other local authorities undertake green waste recycling; this included looking at fees charged for taking away green waste. Members would be grateful if you could arrange for a copy of this analysis to be provided to the Committee.

The Committee noted that other local authorities have used reusable bags for the collection of recycled materials, for example, the Vale of Glamorgan has a blue reusable bag system which works well. The Council should review the option of using such a scheme; however, in doing this it should consider how well it might work in all areas. Members felt that such a system might work well in rural areas but not as well in urban areas.

During the meeting Members were told that taking a new kerbside sort approach would involve replacing the existing refuse lorries with new kerbside sort vehicles. The Committee were told that the kerbside sort vehicles are very expensive (approximately £110,000 each) and that it isn't currently possible to acquire them on a lease hire basis. This means that obtaining a new kerbside sort vehicle fleet would require a significant capital investment.

Officers explained that potentially capital funding could be available from the Welsh Government in the form of a grant for such an investment. Members would encourage you to obtain some form of agreement in principle from the Welsh Government that sets out the level of financial support that they are willing to provide. This could help in terms of modelling waste management systems and in planning the Council's finances.

At the meeting it was mentioned that the Council is currently exploring a range of hybrid waste collection schemes which were in effect a combination of kerbside sort and comingling; a favoured example seemed to be a comingled approach with cardboard and glass being separated from the rest of the recycle. The Committee felt that there were clear advantages in taking a flexible approach to modelling waste management systems, particularly in uncertain times. Looking at such hybrid solutions was an example of a sensible and flexible approach.

A Member was concerned that the Council no longer distributes the waste collection schedules to residents on a regular basis; she explained that the Capital Times and posting local waste collection schedules had been used in the past. She felt that it would be useful to put something in the Capital Times which would let all residents know when they could expect to have their waste collected. She suggested that perhaps the Council could look to publish something in the next edition of the Capital Times.

The Committee feel that more work needs to be undertaken with students to encourage them to use the waste collection services properly. It was explained that students often abuse the green bag allocation system and that more work is needed to stop this from happening. The Council should continue to work with the Universities to address the issue.

The Committee were displeased that there is currently a one month wait for the collection of bulky waste in Cardiff; particularly as other local Welsh authorities are able to collect bulky waste within a few days of the request. I would be grateful if you could look into the matter with a view to speeding up the process. It was noted that some housing associations in Cardiff have been

successful in running their own bulky item collection services. Members felt that that there might be some merit in the Council talking to the housing associations to explore if there is any potential for expanding the service for council tenants to help manage demand.

The Committee believe that the development of an effective Waste Management Strategy is vitally important for Cardiff. They are interested in adding future contributions during the development of the strategy and will in the coming weeks evaluate how this could be done. I will keep you updated.

### **Organic Waste Treatment Solution – Procurement Update**

- Members were pleased with the progress made in procuring a partner for the Organic Waste Treatment Solution. They were particularly happy that the new gate fees will be significantly lower than the existing contract rates for dealing with the organic waste. They would like to thank you and the project team for the work that has been undertaken to deliver this positive outcome.

I would be grateful if you would consider the above comments and provide a response to the requests made in this letter.

Regards,

A handwritten signature in black ink that reads "P. D. Mitchell". The signature is written in a cursive, slightly slanted style.

Councillor Paul Mitchell  
Chairperson Environmental Scrutiny Committee

Cc to:

Jane Forshaw, Director for the Environment  
Tara King, Assistant Director for the Environment  
David Lowe, Waste Operations Manager  
Jane Cherrington, Operational Manager – Strategy & Enforcement  
James Buckingham, Organics Project Manager

Paul Keeping, Operational Manager, Scrutiny Services

Joanne Watkins, Cabinet Office Manager

Members of the Environmental Scrutiny Committee