

22 February 2024 at 7.00 pm

Council Chamber, Argyle Road, Sevenoaks

Published: 14.02.24

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Cleaner & Greener Advisory Committee

Membership:

Chairman, Cllr. McArthur; Vice-Chairman, Cllr. Roy

Cllrs. Abraham, Alger, Barker, Clack, G. Darrington, Kitchener, Cathy Morgan, Shea, Varley and White

Agenda

There are no fire drills planned. If the fire alarm is activated, which is a continuous siren with a flashing red light, please leave the building immediately, following the fire exit signs.

	Pages	Contact
Apologies for Absence		
1. Minutes To agree the minutes of the meeting of the Committee held on 23 November 2023, as a correct record.	(Pages 1 - 6)	
2. Declarations of Interest Any interests not already registered.		
3. Actions from Previous Meeting (if any)		
4. Update from Portfolio Holder		
5. Referral from Cabinet or the Audit committee (if any)		
6. Climate Change Strategy	(Pages 7 - 22)	Emma Henshall Tel: 01732 227358
7. Domestic Waste and Recycling	(Pages 23 - 82)	Trevor Kennett Tel: 01732 227407
8. Food Safety Service Plan 2023/24	(Pages 83 - 114)	Glenys Shorrick Tel: 01732 227158
9. Work Plan	(Pages 115 - 116)	

EXEMPT INFORMATION

At the time of preparing this agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public.

If you wish to obtain further factual information on any of the agenda items listed above, please contact the named officer prior to the day of the meeting.

Should you need this agenda or any of the reports in a different format, or have any other queries concerning this agenda or the meeting please contact Democratic Services on 01732 227000 or democratic.services@sevenoaks.gov.uk.

Cleaner & Greener Advisory Committee

Minutes of the meeting held on 23 November 2023 commencing at 7.00 pm

Present: Cllr. McArthur (Chairman)

Cllr. Roy (Vice Chairman)

Cllrs. Abraham, Alger, Clack, G. Darrington, Kitchener, Cathy Morgan, Shea, Varley and White

Apologies for absence were received from Cllrs. Barker

Cllrs. P. Darrington and Robinson were also present.

Cllr. Manston was present via a virtual media platform which did not constitute attendance as recognised by the Local Government Act 1972.

28. Minutes

Resolved: That the minutes of the meeting held 10 October 2023 be approved, and signed by the Chairman as a correct record.

29. Declarations of Interest

There were none.

30. Actions from Previous Meeting

There were none.

31. Update from Portfolio Holder

The Portfolio Holder, and Chairman, gave an update on the services within her portfolio. The Environmental Health service had seen a reduction in the number of complaints received, but this had not lessened workloads as there were absences for long-term illness within the team. A contractor was providing responses to planning applications, which alleviated some of this pressure. A court case concerning a breach of an abatement notice for a farm in Horton Kirby would take place in December. An offer had been presented to an applicant for the Environmental Health Manager role, and it was hoped that they would join the Council by Spring 2024.

The Licensing Team had processed a number of applications for Temporary Event Notices in the run-up to Christmas and the New Year. The service was performing very well against its targets. The team were managing the consultation on the

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council's Taxi Policy, which would be presented to the Licensing Committee in January. Pavement Licensing had been formally placed under the Council's remit, and a review of fees for this would be undertaken.

There were ongoing staff shortages due to sickness within the CCTV team. An external company was being considered to cover the Out-of-Hours service on an ad-hoc basis because of this. The team had received praise from the police recently after they tracked a perpetrator wanted for violence against a vulnerable female, who was later arrested.

The Safety Advisory Group had investigated the outbreak of norovirus at Hever Triathlon, alongside HSE. Current findings suggested that the virus was already present in the river silt, which had been disturbed by the triathlon. This would be a learning point for event organisers.

Direct Services had submitted a bid to the Heritage Lottery Fund for £2.3million for the redevelopment of Bradbourne Lakes. New partners in Historic England, the Rivers Trust, Thames Water, and KCC's Floods team had come forward to support the bid. A new duck feeder has been installed in the area.

The Portfolio Holder shared [some pictures](#) of the newly refurbished Mill Pond, and thanked the team for their hard work in the area.

A consultation on Sunday parking charges would run from the end of November until the end of December.

The new waste collection routes, introduced last year, had produced a year-to-date fuel saving of 15%, or roughly £70,000. 13 old vehicles had been replaced over the past year, to reduce the carbon emissions of the fleet.

32. Referral from Cabinet or the Audit committee

There were none.

33. Budget 2024/25: Review of Service Dashboards and Service Change Impact Assessments (SCIAs)

The Chief Officer – Finance and Trading presented the report which set out updates to the 2024/25 budget process within the existing framework of the 10-year budget and savings plan.

Some changes had been made to future assumptions and they would continue to be reviewed during the budget process. The key cost driver continued to be inflation, with pressure coming through on service demand, the pay award and the cost of goods and services. The items listed in Appendix E reported a current annual budget gap of £1.368m. Members were advised that they were likely to have to make more difficult decisions during the 2024/25 budget setting process than they had had to make for many years.

Informed by the latest information from Government and discussions from Cabinet, it was proposed that the Council once again set a balanced 10-year budget and continued to aim to be financially self-sufficient with no direct funding from Government through additional Revenue Support Grant or New Homes Bonus.

The report presented growth and savings items that had been identified which needed to be considered, and requested further suggestions from the Advisory Committee, before finalising the budget for 2024/25.

It was noted that the growth items SCIA 08 and SCIA 09 identified in Appendices G and H were considered in further detail in Minute 37 – Pest Control Service Review, and Minute 38 – Cess Pool Service Review, and consideration of these items would be better conducted separately.

The Committee considered the savings proposals set out in Appendices G and H, which were the removal of the supply of black sacks for residents, the provision of recycling “bags for life” in place of disposable recycling sacks, and the closure of the Bat & Ball and Greatness Air Quality Monitoring Stations. There was support for these proposals.

Members gave further consideration to additional suggestions for growth and savings which had been suggested by Members and required consideration of the Committee. Those suggestions relevant to this Advisory Committee were as follows:

- Reduce the number of refuse collections and street cleaning sessions per month by one.
- Issue sustainable, stronger waste bags to residents, and collect them fortnightly rather than weekly.
- Provide a new market in New Ash Green
- Reduce the Net Zero budget.

Following debate Members agreed that none of the suggestions would be recommended to Cabinet.

Public Sector Equality Duty

Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: That it be recommended to Cabinet that

- a) The saving proposal (SCIA 4) identified in Appendices G&H to the report applicable to this Advisory Committee, be considered; and
- b) That no further income or growth proposals were identified.

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34. Scrap Metal Fees

The Head of Licensing presented the report, which outlined the proposed fees for applications for scrap metal licenses. Members' attention was brought to the supplementary agenda, which corrected an error in the original report. The fees for 2024/25 were proposed to include an inflationary cost of 7%. The officer explained that the fees were set out on a cost recovery basis, and provided the authority with the funding needed to administer the legislation and ensure compliance. Enforcement was an ongoing issue for the team, as there were legal barriers around stopping collectors on the street. The 7% increase in fees would come into effect in April 2024.

Resolved: That it be recommended to Cabinet that the fees as below be approved:

Type of Application	2023/2024 Current Fee	2024/2025 Proposed Fee
Site Licence – Grant (3 years)	£532	£545
Site Licence – Renewal (3 years)	£449	£460
Collectors Licence Grant/Renewal (3 years)	£324	£332
Minor administrative change to licence	£36	£37
Variation – change of site manager	£193	£198
Variation from collector to site licence	£230	£236
Variation from site to collector licence	£149	£153

35. Review of Pre-Application Advice Charges & Other Admin Fees

The Head of Licensing Partnership presented the report, which set out the proposed fees for the pre-application advice service for 2024-25. Members' attention was directed to the Supplementary Agenda, which contained a corrected report and

appendix which indicated that the fees for 2024-25 would include an inflationary cost of 7%. These fees were rounded to whole numbers as there had been issues previously with payment systems losing the pence in the transaction, which then had to be chased.

Members discussed the report.

Resolved: that it be recommended to Cabinet that the appropriate fee levels as set out in Appendix A of the Supplementary Agenda be approved.

36. Animal Welfare - Review of Fees & Charges

The Head of Licensing presented the report, which set out proposed changes to the fees and charges for licenses relating to animal activities, to allow for full cost recovery. The current schedule of fees was from 2018 and no longer recovered the cost of operating the services. Members were advised that the A review was initially planned for 2021 when the licenses issued under the new Animal Welfare Regulations 2018 expired, but that changes in the Environmental Health service, such as the termination of the partnership with Dartford, had delayed it. The updated time and cost analysis indicated that there had been significant increases, as a result of the staff pay award, rises in the cost of administration, and the professional qualification of the Animal Welfare Officer.

In response to questions, the officer explained that the fees for licenses needed to cover the parts of the service that did not generate income, such as enforcement. Officers did not find that fees drove businesses to operate without a license; enforcement officers often found multiple other infringements when they investigated unlicensed businesses.

Resolved: That the adoption of the new fees for the licensing of activities under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, the Dangerous Wild Animals Act 1976 and the Zoo Licensing Act 1981 by Cabinet be supported.

37. Pest Control Service Review

The Head of Direct Services presented the report, which proposed the termination of the pest control service. This was a non-statutory service which operated at a market share of below 2%. In 2022/23, only 348 domestic jobs were completed. A single officer provided the service, meaning it had very little resilience. The officer explained that the business landscape for pest control services had changed; many home insurance policies now included pest control, and the service was not cost-effective. The council would work with the British Pest Control Association to source local accredited suppliers, to ensure that residents were able to access local businesses.

Members discussed the report.

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Resolved: that it be recommended to Cabinet that Option 2, as detailed within the report, be approved.

38. Cess Pool Service Review

The Head of Direct Services presented the report, which set out the service review of the cess pool emptying service, and recommended its cessation. This was a non-statutory service for domestic and commercial customers, and had historically struggled to generate profit, despite frequent usage. The service was unable to secure profitable jobs in competition with the private sector. The service consisted of a single cesspool tanker, one driver, and one operator. A pre-MOT test investigation had shown that the tanker would fail in nearly every area, and would require significant investment to remain operable.

In response to questions, the officer explained that there were a number of private cesspool services within the district, so the termination of the service would not negatively impact existing customers. Only one other local authority across Kent, Surrey, and Sussex maintained a cesspool service, though they were also reviewing the service with a view to end it. Communications would be issued to existing customers to help them migrate to new providers. These would focus on promoting local services.

Resolved: that it be recommended to Cabinet that Option 2 - Cease the Cesspool Service, as detailed in the report, be approved.

39. Work Plan

The Work Plan was noted.

THE MEETING WAS CONCLUDED AT 8.23 pm

CHAIRMAN

CLIMATE CHANGE STRATEGY

Cleaner and Greener Advisory Committee – 22 February 2024

Report of: Deputy Chief Executive and Chief Officer for Planning and Regulatory Services

Status: For decision

Also considered by: Cabinet – 14 March 2024
Council – July 2024

Key Decision: Yes

Executive Summary: This report presents a Climate Change Strategy for Sevenoaks District to members for approval.

This report supports the Key Aim of: The Council's commitment to tackling climate change.

Portfolio Holder: Cllr. McArthur

Contact Officer(s): Emma Henshall, Ext. 7358; Margaret Carr, Ext. 7341

Recommendation to Cleaner and Greener Advisory Committee:

To consider the Climate Change Strategy and recommend to Cabinet that it be approved, subject to final design and any associated amendments.

Recommendation to Cabinet:

To approve the Climate Change Strategy for Sevenoaks District; subject to final design and any associated amendments.

Recommendation to Council:

That Council notes the previous aspiration to reach net zero by 2030 for the Council and its assets will not be achieved, for the reasons set out in paragraphs 1-4 of the report.

Reason for recommendation: To ensure that the District Council continues to play its part in tackling the challenge of climate change.

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Introduction and Background

- 1 The Council's commitment to tackling climate change dates back to 2019. Over the last five years we have successfully delivered a wide range of projects that have contributed towards a reduction in the Council's carbon emissions.
- 2 However, cumulatively these efficiencies are not enough to get us to net zero by 2030 and we still face a significant challenge. Decarbonising the Council's buildings and fleet and offsetting the emissions we cannot remove has been estimated to cost in the region of £7 million. Whilst we have a plan in place to replace our fleet with more efficient and less polluting vehicles, it is not currently possible to make this operation net zero as the electric waste vehicles available do not have the range required to complete our waste rounds. We therefore need to be realistic about what we can achieve given the resources available.
- 3 Additionally, the most recent data from the Department of Energy and Net Zero (DENZ) tells us that our own carbon emissions account for less than 0.5% of those across the District.¹ Furthermore, the Council has very little scope to directly and substantially influence the two major sources of these emissions, namely those from transport and domestic use of gas and electricity. These sources account for 61% and 26% of the District's emissions respectively.
- 4 The evidence therefore suggests that the Council's aspiration to reach net zero by 2030 is no longer realistic, and we should use our limited resources where they will make the most impact. While we will continue to work towards reducing our own emissions where resources allow and where practicable, we are more likely and better placed to make a difference through focusing more on community leadership, partnership and engagement to take a broader, inclusive approach to the challenge of climate change.
- 5 The Climate Change Strategy has been developed to this end, shifting the focus to prioritise working with our residents, businesses, partners, visitors and community groups to raise climate awareness and unlock potential.
- 6 Whilst there is currently no legal requirement for local authorities to act, the Council is well placed to respond both as an organisation in its own right as well as having the potential to influence and to demonstrate leadership within our communities.

¹ (*source: www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics)

What the Climate Change Strategy does

- 7 The Climate Change Strategy brings our work to reduce carbon emissions in line with national and regional climate change policy, strengthening our opportunities for partnership working to unlock funding and initiatives, and ensures we are all working towards the same goal.
- 8 It aligns with the Council Plan and directly links with other Council strategies, policies and projects, ensuring a robust and inclusive approach that puts climate change consistently at the forefront of all Council decisions and across all service areas.
- 9 It identifies the opportunities and challenges that exist within the District, including our strategic road network, the Green Belt, how our population is expected to change, and our sphere of influence. Analysis of these key considerations clearly identifies easy wins and where we should focus our efforts.
- 10 It then sets out six climate change priorities covering: movement, travel and transport; energy and buildings; the Council's built assets and fleet; resources, consumption and waste; the natural environment; and awareness and engagement. Specific high level aims are set out for each priority.
- 11 The Strategy itself is deliberately high level, recognising that we need to aim high, but also retain flexibility to cope with and adapt to change. It is envisaged that, subject to the Strategy being approved by Members, a new Action Plan will be developed to deliver the priorities, and monitor progress against them. Each service area across the Council will be responsible for delivering their actions.

The Council's 2030 commitment

- 12 The previous aspiration to reach net zero by 2030 for the Council and its assets is no longer realistic and will not be achieved, for the reasons set out earlier in this report. It has been recorded on the Council's Strategic Risk Register since 2019, which identifies the following risk factors and mitigation (internal controls).

Risk factors:

- Technology does not sufficiently advance to allow the Council to replace fleet;
- Technology is too expensive to allow the Council to replace fleet;
- Cost of work to Council assets (prohibitive);
- Retrofitting of assets not technically feasible;
- Delay in delivering actions and projects beyond 2030;

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- Lack of adequate funding; and
- Slippage on net zero pathway.

Mitigation (internal controls):

- Officer working group;
- Monitoring and political oversight;
- Training and skills development through best practice groups;
- Net zero fund;
- Net Zero Action Plan has been agreed by members;
- Progress against actions is monitored by Cleaner & Greener Advisory Committee quarterly;
- Kent & Medway Environment Group (KMEG) and county alignment;
- Continual pathway analysis; and
- Procurement of a carbon reduction plan.

- 13 As a result, with the adoption of the Climate Change Strategy it is considered timely to revisit the previous aspiration to align with what is practicably possible.

Other options Considered and/or rejected

The Council has made a commitment to tackle the challenge of climate change. We could continue with the current Action Plan dating back to 2019, however this is not recommended. Our knowledge and understanding of climate change and carbon emissions for the Council and the District has changed and improved, including our awareness of what we can and cannot influence. This new Strategy provides a reset, and takes account of where the Council should be allocating resources to have the most impact on reducing carbon emissions.

Key Implications

Financial

Funding will be required to deliver the priorities and aims set out the Strategy, however much of this can be met through existing budgets and we will seek to maximise external funding wherever possible. Any additional funding will be considered and identified at a project level in the forthcoming Action Plan.

Legal Implications and Risk Assessment Statement

No legal implications have been identified.

Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Net Zero Implications

The decisions recommended in this paper directly impact on the Council's commitment to tackle the challenge of climate change. The impact has been reviewed and there will be a decrease in carbon emissions produced in the District as a result of this decision.

Appendices

Appendix 1 - Sevenoaks District Climate Change Strategy

Background Papers

None.

Richard Morris

Deputy Chief Executive and Chief Officer for Planning and Regulatory Services

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Sevenoaks District Climate Change Strategy 2024

Our Vision and Purpose

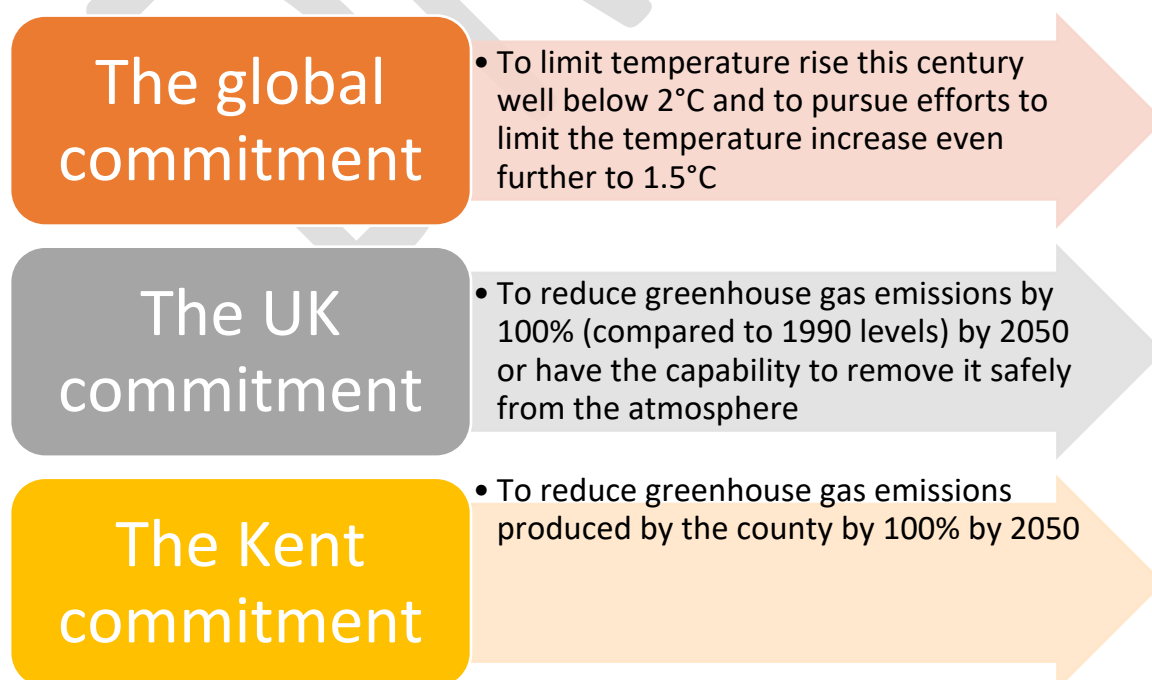
Our Climate Change Strategy marks the Council's commitment to tackling the challenge of climate change across the District. It provides a framework for our actions aimed at reducing carbon emissions (mitigation) and adapting to the effects of climate change that are already happening (adaptation), **to provide a better environment for future generations.**

We recognise that we cannot take on this challenge alone and win – the Council's emissions (from our built assets and fleet) account for less than 0.5% of those from the District as a whole, so in addition to our continuing work on reducing our own emissions, we therefore need to look at how we can help and enable residents, businesses, visitors and community groups to embrace local climate action and behaviour change in order to reduce emissions across the district. **We all have a part to play.** The Council has a key role in terms of leadership, community engagement and enablement, partnership working, unlocking funding wherever possible and sharing ideas and information.

Collectively, we will take responsibility for leaving the District in a better place than how we found it.

Why do we need a Climate Change Strategy?

Globally, nationally and locally our partners are responding to the challenge of reducing greenhouse gas emissions. Our strategy will help to place the District within this context, and will build on what we have learned from our own climate change activity over the past five years.

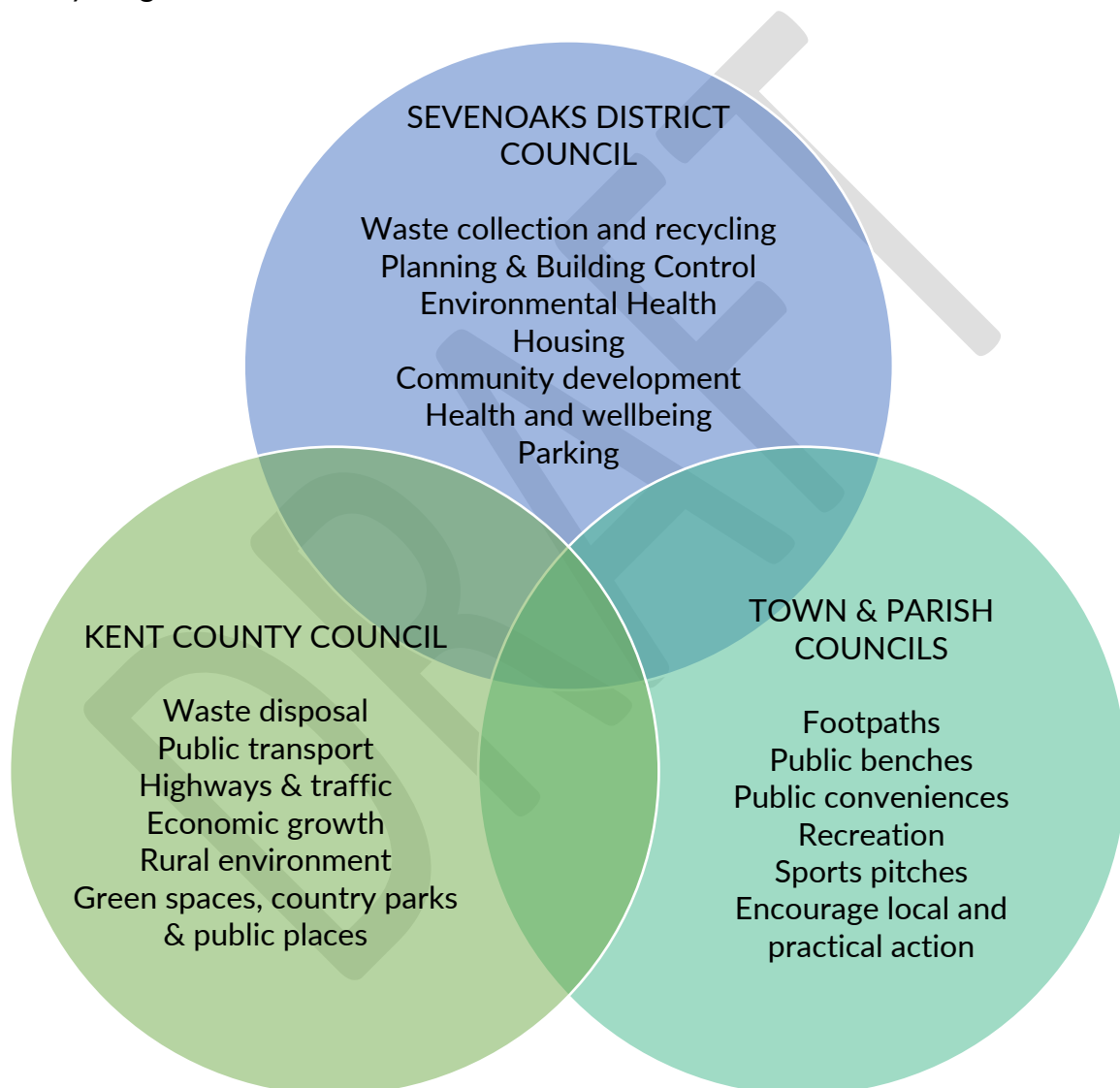


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Whilst there is currently no legal requirement for local authorities to act, the Council is well placed to respond both as an organisation in its own right as well as having the potential to influence and to demonstrate leadership within our communities.

What is the Council responsible for?

The Council has specific services it is responsible for, which differ from those provided by Kent County Council and by our town and parish councils. We can achieve more by working together and through integrating climate action into everything we do.



What have we done so far?

Climate change has been a key priority for the Council since 2019, and over the last five years we have successfully delivered a wide range of projects in support of this.

<p>Moved more of our fleet to electric. More than 100,000 miles have been travelled in electric vehicles</p> 	<p>Installed electric charging points in our car parks, at our offices and on street for taxis</p> 	<p>Working with experts to roll out electric vehicle charging points across more locations</p> 
<p>Purchased new, more efficient and less polluting waste trucks</p> 	<p>New waste rounds are reducing fuel consumption & carbon emissions by 5%</p> 	<p>Installed motion sensitive lighting in our decked car parks</p> 
<p>Produced our first cycling & walking plan and secured funding for a safe walking and cycling route</p> 	<p>Hybrid working and virtual meetings have cut staff and councillor travel to work by a third, reducing emissions</p> 	<p>Air quality has improved over the past nine years</p> 
<p>Printing In Shape on carbon neutral paper</p> 	<p>Built a new energy efficient leisure centre, reducing energy and running costs</p> 	<p>Net Zero implications included in all major Council decisions</p> 
<p>Working with specialists to reduce energy consumption in our buildings</p> 	<p>Planted trees across the District to support biodiversity and offset CO₂ emissions</p> 	<p>Led Kent's most successful household solar scheme with 264 residents signing up for solar panels</p> 

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How will we continue to tackle the challenge of climate change?

Our Climate Change Strategy re-sets the Council's approach. It places community leadership and engagement at the forefront, and recognises that through working with our residents, businesses, partners, visitors and community groups to raise climate awareness and unlock potential, we can make more of a difference.

Through taking action locally we can help create a healthier, greener, more resilient and sustainable District.

The Council will lead by example in influencing others to make sure that we are all doing what we can to protect the environment around us. Reducing carbon emissions across the District is a team effort.

Our Climate Change Strategy aligns with the promises our Members set out in the Council Plan priorities: communities, environment, economy, housing and finance and investment.



It also influences many of the Council's services and directly relates to other Council strategies, policies and projects, all working towards the common goal of tackling the challenge of climate change.



This robust and inclusive approach ensures that climate change is consistently at the forefront of all Council decisions, across all service areas, innovating and working together to instil positive behaviour change.

Our District

Sevenoaks District is located in West Kent in the South East of England, covers 143 square miles and has a population of 120,500 (2021 Census)

In 2021 the District emitted over 700ktCO₂e, approximately 7% of Kent's overall carbon emissions *

Transport and domestic use account for the largest proportion of carbon emissions (61% and 26% respectively) in the District *

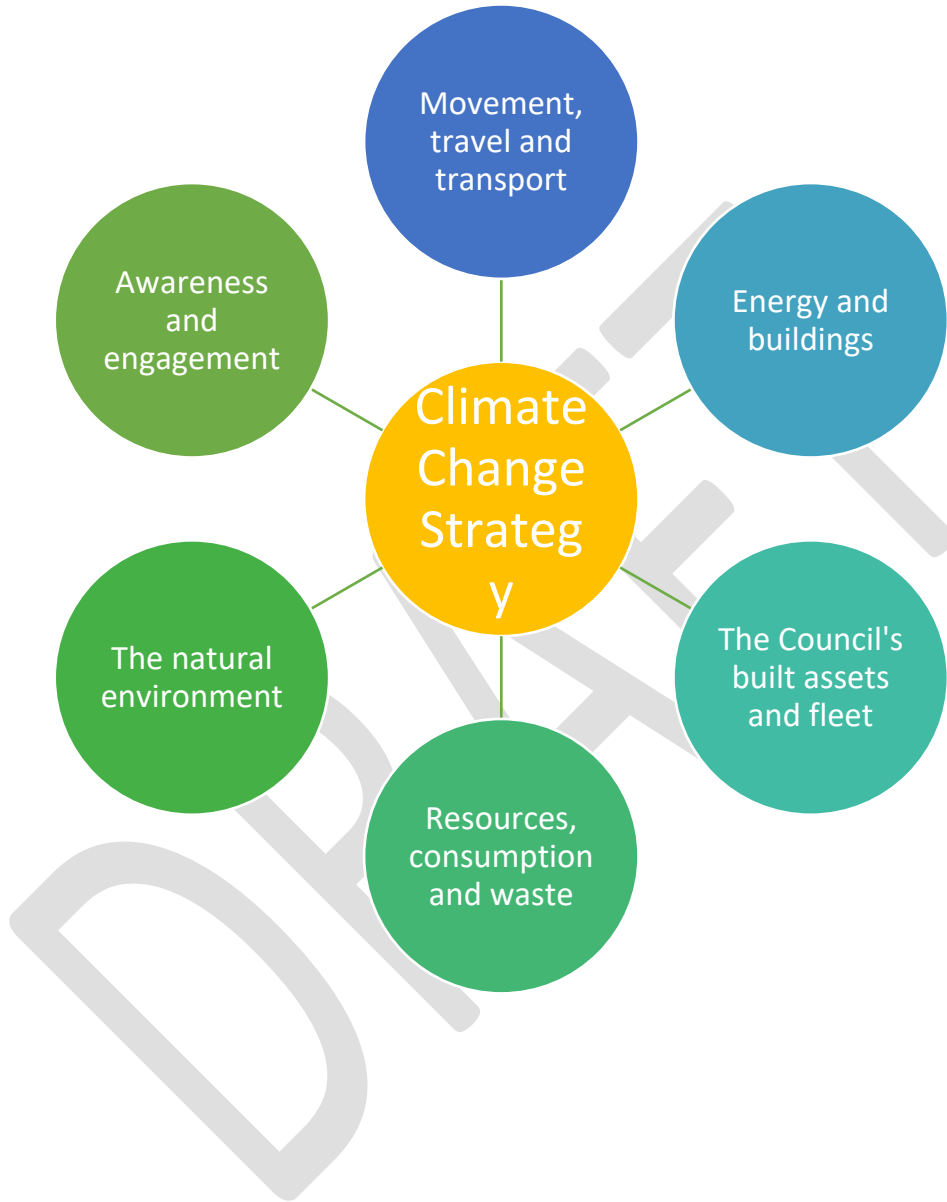
(*source: www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics)

Our opportunities and challenges:



	Opportunities	Challenges
Strategic road network – the M20, M25, M26, A21 and A25 all run through Sevenoaks District	Provides an opportunity to promote and facilitate sustainable movement including walking, wheeling and cycling for local journeys, and use of electric vehicles, car clubs and public transport.	Many road users are passing through as part of a longer journey and so our ability to have a direct influence on these types of emissions is a significant challenge.
Green Belt – 93% of Sevenoaks District is designated as Green Belt	Land in the Green Belt may provide opportunities for offsetting carbon emissions and carbon capture.	The Green Belt has limited potential for development and it is unlikely that large scale renewable energy schemes would be considered suitable in this location.
Demographics – the population of Sevenoaks District is projected to grow and is ageing	There is an opportunity through the Local Plan to ensure that all new development mitigates and adapts to the impacts of climate change, helping to reduce carbon emissions.	Our ability to influence behaviour change across all age groups is a key challenge, recognising that a one size fits all approach is not likely to be successful.
The Council's sphere of influence	As overall knowledge and understanding of “what	The Council has very limited influence on the



	<p>works” in reducing emissions also increases, partnership provides increased opportunity to work more effectively in this area. We can help to share “what works” with partners across the district, and continue to engage with our partners such as government, KCC, residents and businesses, as well as working effectively across all our teams, in support of our aims.</p>	<p>major sources of the District’s emissions (transport and domestic use of gas). Even if we reduced/offset all the Council’s emissions, this would only account for 0.5% of those of the District.</p>
<p>Funding and resources</p>	<p>Partnership working provides opportunities for collaboration and can increase the range and impact of available funding.</p>	<p>The cost of living and inflation have impacted our resources; our stated commitment to providing best value to our residents and businesses means we need to prioritise our actions carefully to produce the most effective outcomes.</p>

Our Climate Change Priorities


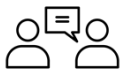


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Movement, travel and transport 	Energy and buildings 
<p>We want to change the way we use transport by creating a sustainable movement network across our District, making it easier to walk, wheel, cycle and use public transport. We will embrace new technology and ensure we have the right infrastructure in the right place at the right time. Promoting active travel and reducing carbon emissions from transport will have a positive impact on the health and wellbeing of our communities.</p>	<p>We want to ensure that all existing and future homes, businesses and other buildings are as efficient as they can be, saving costs for the consumer, and helping to reduce demand for energy and water. We will work with partners and infrastructure providers to share the latest information about schemes and grants available to our communities and businesses.</p>
<p>Our aims:</p> <ul style="list-style-type: none"> • Reduce the need for travel and discourage unnecessary travel • Increase walking, wheeling and cycling • Increase use of public transport • Change the way we move goods • Shift to electric vehicles 	<p>Our aims:</p> <ul style="list-style-type: none"> • Increase energy efficiency of homes and businesses • Reduce water consumption in homes and businesses • Embrace new technology including carbon capture / storage
<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Deliver the Movement Strategy and annual Parking Management Review • Use the results from our EV Infrastructure Study to boost the charging infrastructure across the District • Continue to deliver our Air Quality Action Plan 	<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Provide support for home energy retrofit improvements e.g. Solar Together and share ways to save water • Deliver energy and water efficient development, including embracing the use of new technology, through the Local Plan
<p>Key measure of success:</p> <ul style="list-style-type: none"> • Deliver a new walking, wheeling and cycling route in Sevenoaks urban area and develop detailed designs for two further routes 	<p>Key measure of success:</p> <ul style="list-style-type: none"> • Continue to be one of the top Kent authorities for Solar Together registrations

<p>The Council's built assets and fleet</p> 	<p>Resources, consumption and waste</p> 
<p>We want to lead by example, and to demonstrate that we are doing all we can to continue to reduce the emissions from our own estate and to make sure that our buildings are sustainable well into the future.</p>	<p>We want to improve our rates of recycling and reduce the amount of non-recyclable waste that we collect. We also want our communities to have accessible information as consumers to make choices that support the environment.</p>
<p>Our aims:</p> <ul style="list-style-type: none"> • Reduce carbon emissions from our buildings • Reduce carbon emissions from our fleet 	<p>Our aims:</p> <ul style="list-style-type: none"> • Significantly increase recycling • Reduce non-recyclable waste • Provide the right information to enable our communities to make climate friendly choices
<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Review the current sustainability of our assets, and where resources allow, implement heat decarbonisation plans for our buildings • Continue with our plans to replace the fleet with electric vehicles 	<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Review our waste and recycling services and make recommendations for optimising our rates of recycling across the District • Work with partners to encourage positive behaviour change around consumer choices
<p>Key measure of success:</p> <ul style="list-style-type: none"> • Achieve a year on year reduction in the Council's carbon emissions 	<p>Key measure of success:</p> <ul style="list-style-type: none"> • Deliver annual improvement in recycling rates

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<p>The natural environment</p> 	<p>Awareness and engagement</p> 
<p>We want to preserve and strengthen the protection and climate benefits provided by the natural environment, and demonstrate that we are adapting in a timely and appropriate way to the changing climate.</p>	<p>We want to harness the skills and enthusiasm of our communities in support of the climate change challenge and send the message that local action at any scale plays a hugely important role in reducing the District's emissions.</p>
<p>Our aims:</p> <ul style="list-style-type: none"> • Recover nature and strengthen natural resilience • Improve biodiversity • Increase natural carbon capture / storage 	<p>Our aims:</p> <ul style="list-style-type: none"> • Raise climate awareness • Engage residents, businesses and community groups with local action • Develop support and partnership working
<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Work with partners including Kent Wildlife Trust and KCC to deliver enhanced biodiversity and carbon capture / storage • Plant more trees to help offset carbon emissions 	<p>How are we going to get there?</p> <ul style="list-style-type: none"> • Promote our Better Together online platform to enable communities to deliver local "green" projects • Share local case studies and best practice to inspire community action
<p>Key measure of success:</p> <ul style="list-style-type: none"> • Work with our partners to explore and implement a natural capital and biodiversity net gain project 	<p>Key measure of success:</p> <ul style="list-style-type: none"> • Deliver climate change specific engagement with town and parish councils

DOMESTIC WASTE & RECYCLING

Cleaner & Greener Advisory Committee – 22 February 2024

Report of: Deputy Chief Executive & Chief Officer - Finance & Trading

Status: For Decision

Also considered by: Cabinet – 14 March 2024.

Key Decision: Yes

Executive Summary: This report updates on the current domestic waste and recycling collection service issues; future challenges and proposes a number of new domestic waste collection recommendations for the district.

This report supports the Key Aim: a green environment and safer communities

Portfolio Holder: Councillor McArthur

Contact Officer: Trevor Kennett, Ext. 7407

Adrian Rowbotham, Ext. 7153

Recommendation to Cleaner & Greener Advisory Committee: That the recommendations as detailed in this report be considered by the Committee, and its views be submitted for consideration by Cabinet.

Recommendation to Cabinet: That the following recommendations be approved.

- I. An internal desktop feasibility study undertaken on bi-weekly waste collection costs and impacts.
- II. A Waste & Recycling residents' survey is undertaken in 2024.
- III. Consideration of implementing waste presentation rules restricting on black sacks placed out on collection days, restricting the use of existing wheelie bins for storage only.
- IV. Consideration for either the removal of garden waste sacks or the combination of a customer booking system and fee increase to reflect the service offered. The garden waste bin service will not be effected.
- V. To obtain legal advice on the Environment Act 2021 on other waste collection options under the legislation.

Reason for recommendation: Our domestic waste collection services are a main priority for the Council, so it is vital that they operate in an efficient and effective manner, while remaining sustainable and affordable for the council. Current working practices and future legislative challenges to the service require us to look at alternate service delivery options.

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Introduction

1. At its meeting on the 6th July 2023, the Scrutiny Committee debated the need for a review into the councils recycling performance. The Scrutiny Committee asked Cabinet to consider this further. On the 19th September 2023, Cabinet considered the referral from Scrutiny Committee, which asked Cabinet to look at recycling rates within the District. Members discussed the referral, noting that a report be bought to Cabinet via the Cleaner & Greener Advisory Committee for further consideration.
2. Given the UK Governments, determination to deliver on its environmental targets it is vital that the Council actively plan to change and improve our waste collection services. The priority is to increase efforts to increase recycling rates, deliver greater value to local taxpayers, and shift towards net zero and to lower black residual waste.
3. The Department of Environment & Rural Affairs (DEFRA) classifies the council as a high cost, low performing waste collection authority, under the funding formula for extended producer responsibility grant. This gives us wider uncertainty on the modelled costs for Extended Producer Responsibility (EPR), which could fail to provide the full net costs required for us to continue to deliver waste collection services with all of the new requirements placed upon us, particularly for food and glass collections.
4. If our performance on recycling does not dramatically improve and we lower black residual waste, the new funding formula for local authorities to meet the cost of expanding our waste collection services to include new materials will leave us with significant capital and revenue expenditure shortfalls.
5. In our district, we currently provide:
 - A weekly domestic collection of both waste streams (residual waste via black sacks, and co-mingled dry recycling collection via clear sacks).
 - Glass managed via public bring-to sites and not collected from households at the kerbside.
 - A chargeable fortnightly garden waste service offered to households throughout the year, which includes unplanned collections of garden waste in paper sacks.
 - For all waste streams, waste presented collected regardless of quantity. Food waste mixed in with residual black waste.

- The Councils current weekly waste collection services involve over 65 full time employees, a fleet of 27 dedicated daily used waste vehicles on collection rounds at a yearly cost of £3.4 million.

Waste Collection Authority

- Under section 45 of the Environmental Protection Act 1990, Sevenoaks District Council are the Waste Collection Authority. This statutory duty requires the council to arrange for the collection of household domestic waste in its area except waste, placed, in the opinion of the authority in isolated or inaccessible places that the cost of collecting would be unreasonably high.
- As the Waste Collection Authority, the Council passes on the waste to Kent County Council, the waste disposal authority tasked with the ultimate treatment and disposal of that waste.
- Under the Environmental Protection Act, the council can require occupiers of households to present their domestic waste for collection in a specified way. Household waste, also known as domestic waste or residential waste is disposable materials generated by households only.

Resident Survey & Performance

- In the councils resident survey in September 2021 when asked about satisfaction with our refuse & recycling services, 91% said it was good or very good. The Local Government Association (LGA) benchmark is 79%.

Performance Indicator	2022/23 target	2022/23 actual
Number of missed collections per 100,000 of the population.	8	77.8
Percentage of missed collections put right by the next working day.	98%	94.3%

National Context

- The UK Government has a target to reuse and recycle at least 65% of domestic municipal waste by 2035. The 2022 national recycling rate is 44%, which is below the previous target set to reuse and recycle at least 50% of municipal waste by 2020.
- The current recycling rate for Sevenoaks is below the National average at 36.7%; made up of 20% garden waste and 16.7% recycled material.
- Recent waste research has shown that the lack of a consistent recycling infrastructure may prove an obstacle to improving recycling rates as residents

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across the UK face different recycling schemes organised by each English authority.

14. By 2025 DEFRA, who set the targets, hope to have 55% of waste recycled, as measured by weight.

Resources and Waste Strategy for England - Environment Act 2021

15. The Resources & Waste Strategy for England makes it clear that the UK Government is determined to transform the way waste is collected, recycled and reused for waste materials so all avoidable waste eliminated by 2050.
16. The UK Government supports comprehensive and frequent rubbish and recycling collections. Household recycling rates in England increased significantly from 11% in 2001 to 45.2% in 2017. However, in recent years, progress has been slower and rates have remained at around 44%. While many local authorities continue to make improvements and introduce new services, some have seen a drop in recycling rates and do not collect the full range of materials that can be recycled, or do not collect food waste separately. According to the strategy, householders who want to recycle more are increasingly confused about what can be recycled.
17. The key provisions and implications for local government of the Environment Act 2021, which received Royal assent on 9th November 2021 are summarised as follows:
 - a. Governance and the Office of Environmental Protection (OEP) - The Act introduces a new framework for setting long-term, legally binding targets for environmental improvement.
 - b. The Act introduces the polluter pays principle and this will apply to producers of waste packaging. The Act establishes the new OEP as an independent, domestic watchdog. The OEP will have enforcement functions over public authorities who fail to comply with environmental law and powers to deal with significant environmental complaints.
 - c. Waste and Resource Efficiency: recycling - The Act includes provisions that will require producers to pay the full net cost of managing specified products and materials at end of life, to incentivise more sustainable use of resources. DEFRA, working with local authorities to shape the reformed producer responsibility scheme. DEFRA has delayed this by a further year to October 2025.
 - d. Managing waste: the Act provides provision for recyclable household waste in each recyclable waste stream to be collected separately, except where it is not technically or economically practicable to do so. Separate

recycling streams are glass, metal, plastic, paper and card, and garden waste. This requirement will also be applicable to commercial trade waste.

- e. From 2026, food waste collected separately on a weekly basis. Glass, collections made separately from the kerbside.

18. Statutory guidance awaited from the Government on other changes within the Act, including standardisation of waste bins, waste collection service standards; garden waste services and recycling targets, which will be linked to the funding formula from the producers' responsibility payment scheme.

19. In October 2023, the Government announced new plans for simpler recycling collections and tougher regulation to reform waste systems. Further guidance will follow, however the new scheme proposes to introduce exemptions to allow all councils in England to offer just 3 waste containers (bins, boxes or bags) – for dry recycling, food waste and residual (non-recyclable) waste. Simpler Recycling will ensure that local authorities retain the flexibility to collect the recyclable waste streams in the most appropriate way for their residents. Subject to consultation with relevant parties, the exemptions confirmed in regulations.

20. Therefore, under the new requirements:

All local authorities in England must collect the same recyclable waste streams for recycling or composting from households. The recyclable waste streams include paper and card, plastic, glass, metal, food waste, and garden waste

Local Authority Data Explorer (Office of Local Government) & Benchmarking

21. The Office for Local Government (OfLOG) provides authoritative and accessible data and analysis about the performance of local government, and support its improvement. Table 1. Waste Management

Data table for selected areas

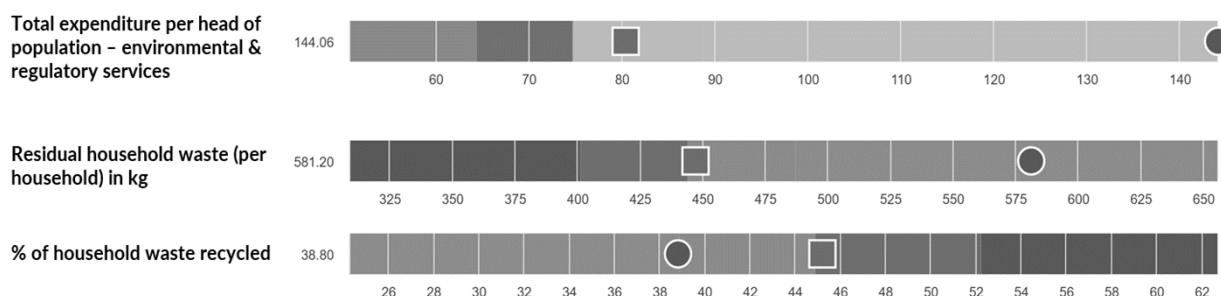
Indicator (click for source data)	Financial year	Sevenoaks	Median of Sevenoaks's CIPFA Nearest Neighbours
Household waste recycling rate	2021-22	38.8%	49.1%
Residual household waste	2021-22	581.2 kg per household	463.5 kg per household
Recycling contamination rate	2021-22	2.2%	4.0%

22. The data in table 1 clearly shows that for 2021-22 our recycling rate of 38.8% is well below the average recycling rate for our closest neighbours, which is 49.1%. As we recycle a low amount, our contamination rate is also proportionately low at 2.2%.

23. Benchmarking comparison with the District Council's in the South East shows our performance on waste and recycling as follows:

Benchmarking – waste & recycling

● Sevenoaks
 ■ Mean for All local authority districts in South East



24. The lack of any waste presentation rules in our district, in other words we collect everything placed out, results in an incredibly high kg per household of 581.2 when compared to our neighbours' average of 463.5 kg per household. This places a huge strain on our daily collection services, staff and vehicles.

25. To collect waste in accordance with new legislative requirements and to hit recycling targets the clear overall direction and priority for the Council for both recycling and residual domestic waste must be to reduce the kg per household for black residual waste and increase recycling.

26. Failure to hit set DEFRA targets for recycling and reducing residual waste will result in a lower funding settlement formula to the council within the new extended producer responsibility payments scheme.

Extended Producer Responsibility (EPR)/DEFRA funding formula.

27. Packaging definition - Packaging is any material that is used to cover or protect goods that are sold to consumers. It makes handling and delivering goods easier and safer. It also includes anything designed at the point of sale, such as a coffee cup.
28. Councils' EPR funding will depend on assessment of waste and recycling services.
29. DEFRA have set out how the scheme will operate to assess the efficiency and effectiveness of local authority recycling services. Technical advisers will examine, in detail, how each council performs. Our data shows us as a high cost, low performing Council.

30. EPR intended to shift the cost of dealing with packaging from councils to producers, but a method needed to allocate funds from producers to individual authorities. This is required because packaging producers will not want to pay extra for council services deemed excessively expensive because they are inefficient.
31. Our rating for this funding formula is of great concern as we have a high cost, low performing service for recycling. The result of this would mean that our funding settlement will be penalised and reduced, meaning that the costs of providing additional domestic waste collection services are unlikely to be covered.

DEFRA Funding

32. On the 9th January 2024, DEFRA announced indicative transitional capital funding available to the council for weekly food waste collections. The funding will be provided in the 2023/24 financial year.
33. Resources (revenue) transitional funding will be provided for the 2024/25 financial year.

Local Authority	Kitchen Caddies	Kerbside Caddies	Communal Wheeled bins	Vehicles	Total Funding
Sevenoaks District Council	£109,941	£252,865	£0	£818,400	£1,181,206

34. The above capital announcement shows, from a funding formula view the disadvantages an assessment of high cost, low performing council for recycling has. Our current planned food waste collection scheme, as advised by Waste and Resources Action Programme (WRAP) in its independent report, utilising 8 x 12 tonne farid vehicles at a cost of £1.2 million (8 x £150,000 at current prices) will need to be reassessed, as the allocated capital funding is only £818,400.
35. A further concern will be the funding of the twenty staff that will be required and the Resources/revenue funding not matching that demand.

Independent Review of the Council’s waste collection services.

36. In 2021 the Waste and Resources Action Programme (WRAP) a waste recycling charity, in partnership with Resource Futures, an environmental consultancy, as part of £25,000 funding made available by DEFRA completed an in-depth

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review and options appraisal of waste and recycling collections for the Sevenoaks District.

37. The options appraisal looked to identify an optimal waste and recycling collection system. The purpose of the funded project was to review the comparative costs, anticipated performance and resource implications of a range of kerbside collection profiles to inform possible future development of the Council's household waste collection service.
38. Resource Futures completed a detailed data gathering exercise to replicate current operations and costs for the service. Ten alternative collection profile options developed including the current service of collection via sacks, weekly of both waste streams. All operational modelling was completed using WRAP's Kerbside Assessment Tool (KAT), which allows current collections modelled and potential kerbside collection profile options evaluated.
39. Costs calculated for each option by identifying the performance and resources necessary to deliver each of the modelled options. The financial assessment considered operational costs including staff costs, vehicle maintenance and fuel, and fees for treating, sorting and/or disposal of materials.
40. The options appraisal concluded that option 3 was the best option to increase recycling: Dry recycling collection changes bi-weekly multi-stream collection via a 'Resource Recovery Vehicle' (RRV). All kerbside households restricted to a limited number of black sacks for bi-weekly residual waste, collected via a single body RCV. In addition, Introducing a weekly food waste collection and separate glass collections provide the greatest increase in recycling to around 48.9%.
41. In June 2023 The Association of Public Sector Excellence (APSE) were commissioned, following a request from the previous Leader of the Council to review the Council's collection methods following the changes to the waste collection rounds in October 2022. (Appendix 1)
42. A waste industry expert carried out a full review, which included staff workshops to discuss the current waste collection service, full policy and procedure review, along with an in-depth study of performance, costs and waste data.
43. In the extensive review the main recommendations were:
 - a. The existing waste collection methodology used to collect waste, on a weekly basis using sacks, will be required to change to bring it in line with the Governments requirements within the Environment Act 2021 to standardised collection policies.

- b. The service cannot continue as it is, collecting unlimited amounts of waste is discouraging residents from separating their waste for recycling.
- c. The current collection methodology is outdated and out of step with waste industry standards and the new Governmental requirements.
- d. The APSE review agreed with the previous WRAP recommendations made in their 2021 option appraisal report to increase recycling by using a bi-weekly single stream waste system.
- e. Black sacks should be limited to encourage recycling and to minimise manual handling by waste operatives.
- f. A full review undertaken on fleet requirements going forward to ensure that changes implemented effectively.

Health & Safety Executive (HSE) Inspection

44. On the 9th July 2023, the HSE carried out a full inspection of our Dunbriek depot and waste and recycling services and operations. Following this inspection, the council received a written formal breach notice of Manual Handling Operations 1992 Regulations 4 (1) and 4 (1) b.
45. The material breach stated:
- a. Your employees are manually handling unknown weights as the domestic collections carried out using black sacks. This compounded by having to bend to reach into wheelie bins used for storage to remove black sacks. Injuries to your employees carrying out this task formally recorded.
 - b. The Regulations requires employers to avoid the need for his employees to undertake any manual handling operations at work, which involve a risk of them sustaining injury.
 - c. To comply with the Regulations the Council should ensure they avoid manual handling risks to our employees by using manual handling aids, which are available and widely used within the waste industry, such as collection vehicles with integrated wheelie bin lifts.
46. A detailed action plan submitted to the HSE states by 31 December 2023 an independent report (APSE) will underpin a new waste and recycling update and considered by the Council's Strategic Management Team (SMT), Cleaner & Greener Advisory Committee and the Councils Cabinet for a decision.
47. Failure to comply with this formal material breach notification for manual handling may result in a further enforcement notices issued and possible prosecution for health & safety violations.

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Waste Collection Industry Standards (ISO 45001)

48. ISO 45001 is the international standard for occupational health and safety management within the waste industry. The standard identifies health and safety risks up front and put controls in place to manage them. ISO 45001 focuses on;
- a. Reduce workplace accidents and illness - Through the implementation of BS standards, organisations can reduce the incidence of workplace accidents and illness, keeping people safe, and cutting related costs and downtime.
 - b. Create the best possible working conditions - As Britain's most dangerous industry, ISO 45001 can assist to create the best possible working conditions within the organisation, which can engage and motivate staff.

Service Challenges

49. **Resources (staffing, including agency)** – Given the large spread of staff and vehicles utilised daily to collect waste and recycling the service is heavily reliant on using temporary agency staff to ensure statutory waste collections are delivered, daily. Also, given the increasing presented waste weights across the district means that our waste services are spread thinly, meaning that any holidays or unexpected sickness absences compounds our reliability of using agency staff, which has a high cost.
50. In 2024-2025, we will look to increase permanent staffing and review or reduce non-statutory services that will allow the prioritisation of weekly waste services.
51. **Black waste sacks** – Black waste sacks used by residents is extremely high, as shown by the yield weight per household being one of the highest in the UK. (581.2 kg per household against National average 440.6 kg). KCC waste audits also show extremely high levels of recycling materials within our black waste. This combined with no presentation rules and the supply of free black sacks is resulting in high residual waste and a low recycling rate.
52. The current methodology for collecting residual and dry recyclable waste in Sevenoaks in no way encourages residents to separate their waste for recycling. The lack of restriction on the amounts of waste placed out for disposal actively encourages residents not to take the time and care to recycle properly. This is evident from the amounts of recyclable materials seen in the back of the residual portion of the vehicles on collection days.
53. To improve recycling rates and to rectify this increasing year-on-year problem it is proposed in the budget report to Council that we stop the supply and delivery of free black waste sacks. This is the first step in reducing residual waste across the district, while supporting the council's 10-year balanced budget. However, we also need to restrict the amount of black sacks presented each week.

54. A black waste sack capacity is 90 litres per sack; therefore, we need to restrict how many full sacks residents can place out for collection weekly. Once the restriction is agreed any additional sacks left will not be collected and stickered informing residents after a grace period for education and compliance.
55. Limiting black waste sacks to households would be positive mitigation for the health and safety material breach on manual handling, as it would significantly reduce the weights and quantity of black residual waste collected by staff.
56. For Christmas 2023 residual waste collections saw an increase, compared with Christmas 2022 of around 45% extra waste collections. An example of these extreme waste levels is that in Swanley crews faced with a group of three properties placing out over 100 black sacks. This huge increase in collecting Christmas period waste is that our vehicles fill up even quicker meaning that more trips to the disposal tip are undertaken. This level of waste collection is unsustainable.
57. **Recycling sacks** – It is proposed in the budget report to Council that clear plastic recycling sacks are replaced with recycling bags for life, which are weighted and reusable would increase recycling weekly capacity for households and only requiring delivery once. Replacement or additional bags for life obtained from Council offices. No further sack deliveries made with substantial savings from year 2.
58. **Waste Storage bins** – The council's current policy is to allow residents to use a bin to store their waste sacks, we recommend they use a smaller traditional 80 to 90-litre dustbin. If they use a wheelie bin, they need to remove sacks from the bin before collection or put a sturdy box in the bottom of the bin so our collection crews can reach the bottom sacks.
59. The operational reality is that a large percentage (estimated at around 65%) of residents have purchased 240 litre wheelie bins, with the majority simply placing their bin out on collection day without removing their domestic waste sacks. This dramatically slows our waste crews for collection and causes manual handling back and strain injuries on the crews through stretching into the bin to retrieve the waste sacks.
60. Wheelie bins used for storage enforced on collection days if not emptied, with the waste not collected and the bin stickered to advise the reason after education and a grace period. Sustained media communication will be required to publicise the new collection rules.
61. **Garden Waste paper sacks** – The council currently offers residents who are not garden waste permit customers paper collection sacks. Each sack holds up to 80 litres of garden waste. Any resident can purchase bundles of 25 sacks from the

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council other locations for £25, (£1 per sack). Any resident can use the paper sacks when they need to without notice.

62. The challenges with this system are twofold 1) we never know when paper garden sacks are placed out for collection, so the garden waste crew need to visit every property in the district to see if paper sacks have been presented. This is in stark contrast to garden permit holders where we know what property to visit and 2) the costs of buying the paper sacks, together with paying our distributors and then collecting them means that the service is loss making.
63. The paper sacks are in addition to garden waste permits for bi-weekly collections using a 240-litre or a 130-litre bin service.

Recommendations

64. An internal desktop feasibility study undertaken by the councils' waste team on bi-weekly waste collection costs and impacts.
65. Consideration given to carrying out a full Waste & Recycling residents' consultation survey in 2024 to help shape the delivery of future waste services.
66. Consideration of implementing waste presentation rules restricting on black sacks placed out on collection days. Restricting and enforcing the use of existing wheelie bins for storage only. All sacks placed out for collection outside of the bin. Full bins not emptied after education and a grace period.
67. Consideration for either the removal of garden waste sacks or the combination of a customer booking system and fee increase to reflect the service offered. The garden waste bin service will not be effected.
68. To obtain legal advice on the four conditions and exceptions of the Environment Act 2021 section 45 & 45a requirements and on other waste collection options under the legislation. Recognising that further changes may be required as to how the service is delivered based on Government legislation and Member wishes.

Key Implications

Financial

All financial costs or savings detailed within this report.

Our rating for the Government funding formula is of great concern as we have a high cost, low performing service for recycling. The result of this would mean that our funding settlement will be penalised and reduced, meaning that we potentially not cover the full costs of providing additional domestic waste collection services.

Please note that prices quoted in the report relate to 2023/24.

Legal Implications and Risk Assessment Statement.

Under section 45 of the Environmental Protection Act 1990, Sevenoaks District Council are the Waste Collection Authority. This statutory duty requires the council to arrange for the collection of household domestic waste in its area except waste, placed, in the opinion of the authority in isolated or inaccessible places that the cost of collecting would be unreasonably high.

Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment.

Appendices - Appendix 1 – APSE Waste Report

Background Papers

<https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<https://www.gov.uk/government/news/simpler-recycling-collections-and-tougher-regulation-to-reform-waste-system>

<https://www.gov.uk/government/news/update-on-packaging-reforms-to-help-drive-down-inflation>

<https://www.legislation.gov.uk/ukpga/1990/43/contents>

<https://oflog.data.gov.uk/>

<https://wrap.org.uk/>

<https://www.apse.org.uk/index.cfm/apse/>

Adrian Rowbotham

Deputy Chief Executive and Chief Officer - Finance & Trading

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Waste Collections Diagnostic Review

Report for Sevenoaks District Council

This report has been prepared by APSE Associate Consultant Paddy Knowles
November 2023
Final Version





APSE (Association for Public Service Excellence) is a not-for-profit local government body working with over 300 councils throughout the UK. Promoting excellence in public services, APSE is the foremost specialist in local authority front line services, hosting a network for front line service providers in areas such as waste and refuse collection, parks and environmental services, leisure, school meals, cleaning, housing, and building maintenance.

APSE provides services specifically designed for local authorities, such as benchmarking, consultancy, seminars, research, briefings, and training. Through its consultancy arm APSE delivers expert assistance to councils with the overt aim of driving service improvement and value for money through service review and redesign. APSE delivers more than 100 projects a year and clients benefit from the consultancy's not for profit ethical approach to consultancy services.

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Waste Collection Diagnostic Review

Report for Sevenoaks District Council

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1.0 Introduction

- 1.1 Sevenoaks waste collection service has recently gone through a period of change and the council are keen to take a view on where the round changes made have affected the service in terms of value for money and productivity. The Council are also keen to learn from good practice and identify any recommendations for service and efficiency improvements.
- 1.2 The Council has commissioned the Association of Public Service Excellence (APSE) to present a diagnostic analysis of the current service delivery model and to identify any options available for the future improvement and development of the service.
- 1.3 The aim of the review is to give an evaluation of the current service provision following recent changes in the way the rounds are configured and to identify prospective options, to assist the Authority to make further decisions regarding the future direction of the service. To meet both the aims and objectives of the authority and to comply with any potential requirements resulting from the pending implementation of the Environment Act 2021.

2.0 Executive Summary

- 2.1 Sevenoaks District Council (SDC) is a non-metropolitan District Council located south east of London in West Kent and has its headquarters based in the town of Sevenoaks. Other towns in the district include Westerham, Edenbridge and Swanley.
- 2.2 The Authority consists of 26 wards and has 54 elected members covering an area of approximately 143 square miles, with a resident population of 120,000 (2021 Census) and a population density of 840 people per square mile (based on information provided by the authority), and according to the latest figures from the authorities G.I.S team 52,507 domestic households in the district, with three main urban areas listed as of Sevenoaks, Swanley and Edenbridge.
- 2.3 The current domestic waste and recycling services are provided by an in-house team on a weekly frequency using a standard 90-litre sack. Black sacks for residual waste and clear for co-mingled recyclable materials excluding glass, paper and card.
- 2.4 The Council operates a paid for garden waste collection system, on alternate weeks using 240 and 140 litre wheeled bins or paper garden waste sacks which residents can purchase from the Council.
- 2.5 The service currently operates from its depot at Main Road, Sundridge, near to the west of Sevenoaks and is located next door to Kent County Councils, Waste Transfer Station (WTS), where the Council's vehicles currently offload and Household Waste & Recycling Centre (HWRC).
- 2.6 Residual waste is collected weekly, based on a 37-hour, five day working week (Monday to Friday). Crews work Monday to Thursday 07.00 to 15.00 and Friday 07.00 to 14.30 and collects from 52,507 domestic properties using standard 90-litre sacks. Black sacks for

residual waste and clear for co-mingled excluding glass and food waste. There are a small number of flats collected using 1100 litre communal bins.

- 2.7 The service is currently formed of 16-rounds, consisting of one driver and either one or two loaders, depending on the vehicle, collecting on a weekly basis. The main rounds, rounds 1 to 10 are currently using 26-tonne 70/30 split refuse vehicles and collect recyclables in the 30% side of the vehicles and residual in the 70% side.
- 2.8 APSE operates the largest public sector benchmarking facility in the UK with over 200 local authority members covering 17 service area including waste. Clients benefit from the mass of performance data contained within the Performance Networks benchmarking database. This is used to provide instant benchmarks to see value for money and where the authority may improve.
- 2.9 As part of this project, Sevenoaks has joined PN for this service area as has contributed data for the first time this year.
- 2.10 The PI standing report for 2021/22 presents a mixed picture for the service with some areas performing well and other areas not so well.
- 2.11 Areas where the service did not perform well included:
- The cost of refuse collection per household (PI 02c) and the cost of refuse collection per head of population (PI 02d), shows the service to be in quartile 3 for both indicators, performing poorly in both the family group and whole service.
 - Tonnes of domestic waste recycled per household (PI 03e) also achieved Quartile 3 status in both the family group and whole service.
 - The percentage of household waste actually composted (PI 12b) also achieving quartile 3 status in both the family group and whole service.
- 2.12 Areas where the service performed well included:
- The percentage of households covered by curbside recycling collections (PI 11) which achieved top quartile performance.
 - Missed domestic residual waste collections (full year) per 100,000 (PI 22c), achieving quartile 1 performance in both the family group and whole service.
 - Missed separate recycling collections (full year) per 100,000 (PI 22e) also achieving quartile 1 performance in both the family group and whole service.
- 2.13 The full PI standing report can be seen in Appendix 1
- 2.14 This is to some degree confirmed when the tonnage data provided by the service is analysed, which shows in figure 2, the trend in residual tonnage collected over the two-year period showing that although the tonnage fluctuates slightly, the trend is reasonably steady with only a very slight downward trend over the period. As more waste is diverted through the recycling systems in place, we should in real terms be

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seeing a much more protracted trend downwards and an upward trend in recycling tonnages.

- 2.15 However, figure 3 shows the trend for dry recyclable collections, which as more waste is diverted from the residual waste stream to the recycling collections, would be expected to be an upward trend, but is in fact a downward trend. The downward trend can in real terms only be accredited to the reduction in the amounts of dry recycling being diverted from the residual waste collection system.
- 2.16 The current methodology for collecting residual and dry recyclable waste in Sevenoaks in no way encourages residents to separate their waste for recycling. The lack of restriction on the amounts of waste that can be placed out for disposal actively encourages residents not to take the time and care to recycle properly. This is evident from the amounts of recyclable materials seen in the back of the residual portion of the vehicles observed on the site visits.
- 2.17 The recycling picture is further affected by the analysis of the bring system used to collect glass, and paper and cardboard, with cardboard and paper, showing a significant downward trend in tonnage delivered to the sites and glass only showing a slight increase in the trend for tonnage delivered.
- 2.18 However, one of the larger areas for concern, is that of green waste collections, which has over the two-year period analysed shown a significant downward trend in tonnage collected. The cause for concern here, is that this material is by its very nature heavy and as such contributes approximately 50% of the tonnage by weight towards the Councils overall recycling figures.
- 2.19 Like most authorities in the UK, Sevenoaks is facing pressure to streamline its services, reduce costs and identify opportunities to improve services, generate additional income and consider its options for future service delivery.
- 2.20 In terms of operational improvement and investment, the service, recently completed a full round reconfiguration exercise using Webaspx, which was designed and predicted to improve service efficiency rather than necessarily reducing costs, by improving round efficiency, vehicle efficiency and by reducing fuel usage, emissions and distance travelled. As a result of rounds becoming more efficient, fuel usage has been reduced by approximately 11%.

3.0 Recommendations

- 3.1 There are several very important issues to be considered when looking at the future of waste and recycling collections in Sevenoaks including the geographical nature of the district and the rurality of some of its communities.
- 3.2 The methodology used to collect waste, on a weekly basis, is a policy the current administration has pledged to continue. Whether or not the use of bags is popular is debatable, having viewed the large number of residents who have already purchased their own wheeled bins. However, if the Council wishes to seriously improve the current

recycling rate and to reduce the health and safety risks to its staff, the service must be prepared to invest in change.

- 3.3 What is clear is that is that crews work hard every day and that the work allocated to them is completed every day. However, this is only achieved using a large number of vehicles resulting in high costs and low performance.
- 3.4 There is no doubt that the service cannot continue as it is, collecting unlimited amounts of waste for disposal and in so doing, discouraging residents from separating their waste for recycling. The current collection methodology is not only outdated but it is out of step with the rest of the country and what the Government is trying to achieve in developing a consistent materials and collection methodology across the UK.
- 3.5 The UK Government will at some point soon make its final decisions on how the new 'simpler recycling collection methodology' for waste and recycling will look. At that point, Council's will no doubt be given a timescale within which to achieve those changes.
- 3.6 WRAP carried out an options appraisal published in March 2021 where they recommended changes to the system including continuing the collection of residual waste using sacks but limiting the number of sacks allowed, collecting the current dry recycling materials in what are termed triple stacker boxes to keep them separate and for glass to continue to be collected as it currently is by means of bring facilities.
- 3.7 Garden waste is recommended to continue using the current wheeled bin configuration, however, the current unregulated use of sacks in addition to bins is an issue that needs addressing as this can cause issues with round configuration as it is difficult to know how much waste is likely to be placed out for collection. Also, food waste is not collected at the present time but is reported to become an additional obligation on the Council as part of the new Regulations.
- 3.8 WRAPS recommendations were of course designed to ensure that the Council complies with what was the then thoughts as to what was likely to be included in the standardised collection regime proposed by the Government.
- 3.9 Based on what we now know and the consultant's observations of the service and experience, following is recommended:

Recommendation 1: Collection Methodology

In the short term, whilst longer term changes are made, it is recommended that the current policy of crews removing unlimited numbers of residual waste sacks cease immediately with residents being restricted to 2 sacks per week.

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It is also recommended that the Council moves as soon as possible to change the current sack system to the use of a single wheeled bin. The size of wheeled bin will need to be agreed, however, as a guide a 180 litre or 240 litre is recommended, with the 180-litre wheeled bin restricting waste that can be disposed of and better encouraging residents to separate their waste for recycling.

The frequency of collection, can if the Council wishes, stay at the current weekly collections, however, this will likely mean that rounds will need to be rebalanced with additional resources. A more sensible approach would be to move to an alternate weekly collection system. In either case the use of a 180-litre bin would be the recommendation to ensure residents were encouraged to separate waste out for recycling.

Recommendation 2: Dry Recycling Collections.

It is recommended that, MRF conditions allowing, the current system of collecting co-mingled waste in a clear plastic sack ceases and that the Council moves to a standard 240 litre wheeled bin be implemented. If MRF conditions do not allow, then the use of the Triple Stacking system as recommended in the 2021 WRAP report should be implemented.

This system alongside the current bring-site system for collecting glass, and paper and card, will ensure that the Council is compliant with the current systems indicated in the Governments plans. It is therefore recommended that this system continues to operate as it currently does.

Recommendation 3: Garden Waste Collections.

It is recommended that there is no change to the current garden waste system and its current use of 240 wheeled bins.

It is however, recommended that tighter controls on the number of sacks a property can put out to be introduced to ensure the rounds do not become overloaded and have capacity to complete at peak times.

Recommendation 4: Food Waste Collections.

It is recommended, that the 2021 WRAP Options Appraisal report recommendation to implement a weekly food waste collection be implemented as soon as possible. It is a firm belief that the new regulation will make this a duty of the Council and require it to be in place by 2026.

In making these changes, the service will need to rethink its fleet requirements, to ensure that recommendations 1 to 4 above can be implemented effectively and helping to futureproof the service and ensure that the service is agile, flexible, and efficient and able to deal effectively with any further legislative changes.

Recommendation 5: Task and Finish.

It is recommended, on the grounds of health and safety and operational efficiency that the Council stops the practice of task and finish on its refuse collection and recycling service and requires all staff to report to the depot both at the beginning of and at the end of the working day.

The only exception to this should be by agreement with the service manager based on a judgement of the circumstances.

Recommendation 6: Work Measurement.

It is recommended that when/if the proposed changes highlighted in recommendations 1 to 4 are implemented, that a work measurement exercise be carried out to establish how the changes have affected productivity levels on the service, and using that new data, carry out a new and completely fresh round optimisation exercise.

This will ensure that the any new or proposed rounds are at peak efficiency but will also present the opportunity to model a few other operational scenarios such as different shift patens, a 4-day working week or moving the service to a two, three or four weekly collection frequency.

Recommendation 7: Bin Deliveries.

It is recommended that when / if a containerised system such as wheeled bins and / or box type system is implemented, that the Council look to make a charge for the delivery of bins lost or stolen and for bins only to be delivered free of charge if it can be established that the bin has been damaged during the collection process.

It is true to say that many bins are stolen because they are left on the street and not returned to the property. Making a realistic charge for the delivery of bins is not an uncommon practice and encourages those residents who are in the habit of not returning their bins to their property following collections to do so or pay the delivery charge when it goes missing.

Recommendation 8: TEEP Assessment.

The Council should have carried out a TEEP Assessment in 2015 but has not, therefore the Council is not in a position to claim that the current collection service is the correct one for the authority or if it meets with the current legislative requirements. Therefore, the following recommendation is made.

It is recommended that A TEEP Assessment be carried out to establish if the way the service currently operates meets the technically, environmentally, economic, and practical criteria which would justify the collection method in place in Sevenoaks.

4.0 Structure of the Report

- 4.1 This report begins with an outline of the current services to be included in the review with the main attributes of each service to be considered. Section 10 will outline the options for each service element which SDC might consider when planning the future direction of the service in detail and to evaluate which option would best meet its objectives. The report concludes with a summary and set of options for Sevenoaks to consider.

5.0 Current Services

Residual Waste Collection Services

- 5.1 Currently, residual waste in Sevenoaks is collected weekly, based on a 37-hour, five day working week (Monday to Friday). Crews work Monday to Thursday 07.00 to 15.00 and Friday 07.00 to 14.30 and collect from 52,507 domestic properties using standard 90 litre sacks. Black sacks for residual waste and clear for co-mingled excluding glass, paper and card for recycling. There are a small number of flats that are collected using 1100 litre communal bins.
- 5.2 It should be noted at this early stage that during the site visits around the area, it was observed that there are many residents who have purchased wheeled bins themselves, to place their plastic sacks into. It is also noted that as well as the full and sometimes overflowing bins, many of these also put out additional sacks on top.

Fig 1 Photos of wheeled bins, boxes, and sacks on streets:



- 5.3 Residents are requested to place their waste out for collection before 7.00 am on the day of collection, with sacks presented at the curtilage or boundary of the property for collection. Residents are delivered a roll of 20 black sacks every 20 weeks, however, despite this perceived single bag per week limit, crews are required to remove all waste placed out for collection, in many cases in whatever container the resident places out for collection.
- 5.4 Across all waste streams in 2021 /22 a total of 27,746.9 tonnes was collected and 2022 /23 a total of 27,542.6 tonnes was collected (0.010 tonnes per week per household (approximately ½ tonne per annum), and some 223 tonnes less than the previous year.
- 5.5 Table one below shows the round structure provided in the Waste and Recycling Collection Round Review report which we are now aware is a little out of date by approximately 1,000 properties but does give an indication of how the current rounds operate.
- 5.6 Table 2 shows the monthly tonnage figures for 2021/22 and 2022/23 as reported in Waste Data Flow. Fig 2 plots these tonnages to identify the trend in waste arisings over the whole period.

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Table 1 - Residual Waste Collection Round Data:

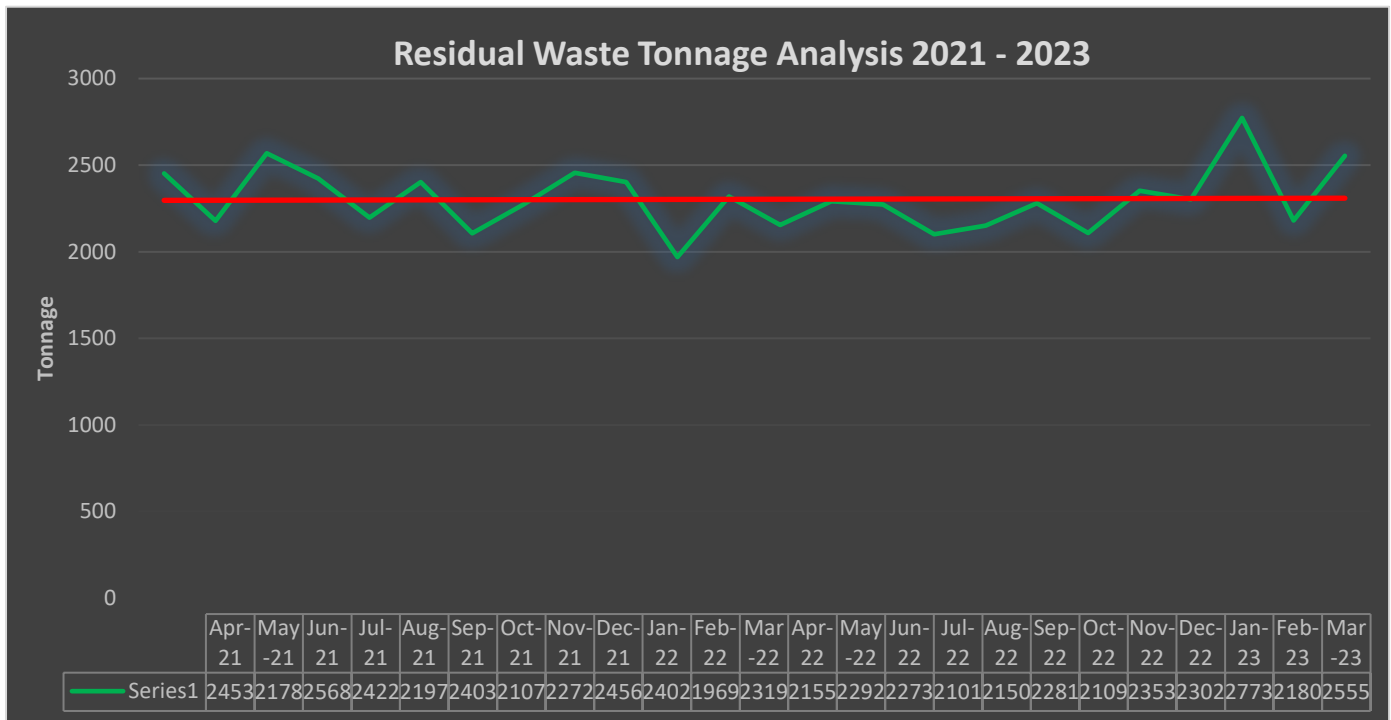
Sevenoaks Residual & Recycling Rounds	Number in crew	Average Properties per crew per day	Average Bins per loader per day	Properties per week
R1	D + 2	819	409	4097
R2	D + 2	851	425	4256
R3	D + 2	845	422	4225
R4	D + 2	850	425	4251
R5	D + 2	839	419	4196
R6	D + 2	827	413	4135
R7	D + 2	871	436	4354
R8	D + 2	689	344	3443
R9	D + 2	694	334	3472
R10	D + 2	307	154	1536
R4 - Mon	D + 1	602	301	3009
Paul 1 - 5	D + 2	724	362	3622
Narrow 1 - 5	D + 1	304	152	1520
Narrow 6 - 7	D + 1	315	158	1573
Narrow 11 - 15	D + 1	341	171	1707
Flats 1 - 5	D + 1	423	212	2117
Total	D 16 + 27			51,513

Table 2 - Residual Waste Monthly Tonnages 2021 – 2023:

Month	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Monthly Tonnes	2452.64	2177.70	2568.18	2422.30	2197.32	2403.16	2106.76	2272.34	2456.38	2402.14	1969.34	2318.64

Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly Tonnes	2154.87	2291.50	2272.97	2101.41	2150.08	2281.14	2109.21	2353.21	2302.37	2772.83	2180.37	2554.60

Fig 2 - Residual Waste Monthly Tonnage Graph 2021 – 2023:



- 5.7 The trend analysis for residual waste shows that across the whole period the level of waste arising has stayed reasonably level with only a very slight downward trend. A contributing factor to this. This indicates that not all the possible recyclable material available in the waste stream is being placed out for collection. This was observed on the site visits where on numerous occasions it could be clearly seen that recyclable materials were being placed out in residual bags and not being recycled.
- 5.8 Cost data submitted to Performance Networks in PI 02c indicates that the cost of refuse collection in Sevenoaks, per household, per year, excluding landfill tax, waste disposal and central administration charges as £76.37 per household. Which based on a current property count of 52,507, equates to a total cost of £ 4,009,959.59 per annum, placing the authority in quartile three in both the family group and all service reports.
- 5.9 Residual waste collected is tipped at the areas WTS, located next the service’s depot at Main Road, Sundridge, which is central enough for those vehicles that normally do two loads per day to travel to, whilst those who are on one load can tip off at the end of the working day or tip and go back out to assist other vehicles working in their zone. The site is operated by Kent County Council who also operate the HWRC next door, and we are informed works well with the authority.
- 5.10 The service is currently formed of 16 rounds, consisting of one driver and either one or two loaders, depending on the vehicle, collecting on a weekly basis. The main rounds, rounds 1 to 10 are currently using 26 tonne 70/30 split refuse vehicles and collect recyclables in the 30% side of the vehicles and residual in the 70% side.
- 5.11 The service reports that there is a turnaround time of approximately of 20 minutes at the transfer station, however, crews attending the workshop reported that this can

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depend on the number of bulk loaders on site when they arrive and have reported waiting times of up to two hours. This could mean that on those occasions' vehicles could be unproductive for anything between one and two hours each time they go to tip.

- 5.12 It is also reported that there are crews returning to the depot before the end of their working days as early as 13.30 which then gives the driver time to refuel and carry out checks on the vehicle. As the work is zoned, all crews will usually stay out to assist the other crews to complete before returning to the depot, however, it was stated that there are some crews who do go deliberately slow to gain assistance.
- 5.13 During the site visits, it was observed that crews although very effective, are working in a manner which could be unsafe, for e.g., running between pickups, throwing sacks above head high, throwing sack in the wagon whilst other operatives are in proximity.
- 5.14 Fig 3 below shows a crew working at the back of the wagon and shows an example of potentially unsafe working.

Fig 3 Photo of a crew working at the rear of the vehicle:



- 5.15 It is true to say that there were a number of issues observed, which we were informed crews are told not to do during their H&S training, however, it is important to understand that when unobserved, and in some cases even when Supervisors are present, crews will follow what they feel is the best way to do things and not necessarily what is considered the safest way.
- 5.16 In terms of innovation, the service has the Webaspx system for route optimisation, which was used to build the current round structure. However, the only person with the license and experience to operate the system has now left the organisation resulting in the system not being updated since the original round restructure exercise, which is the

reason the current round data is out of date with no one to tweak or update the rounds as they develop.

- 5.17 The vehicles also have a camera system fitted to them; however, we are informed that this system is not a full 360-degree system and does not allow live access to enable back-office staff to immediately access information but has to be downloaded by the Supervisor when information is required, elongating investigation times into incidents such as complaints or accidents.

Curbside Co-mingled Recycling Service

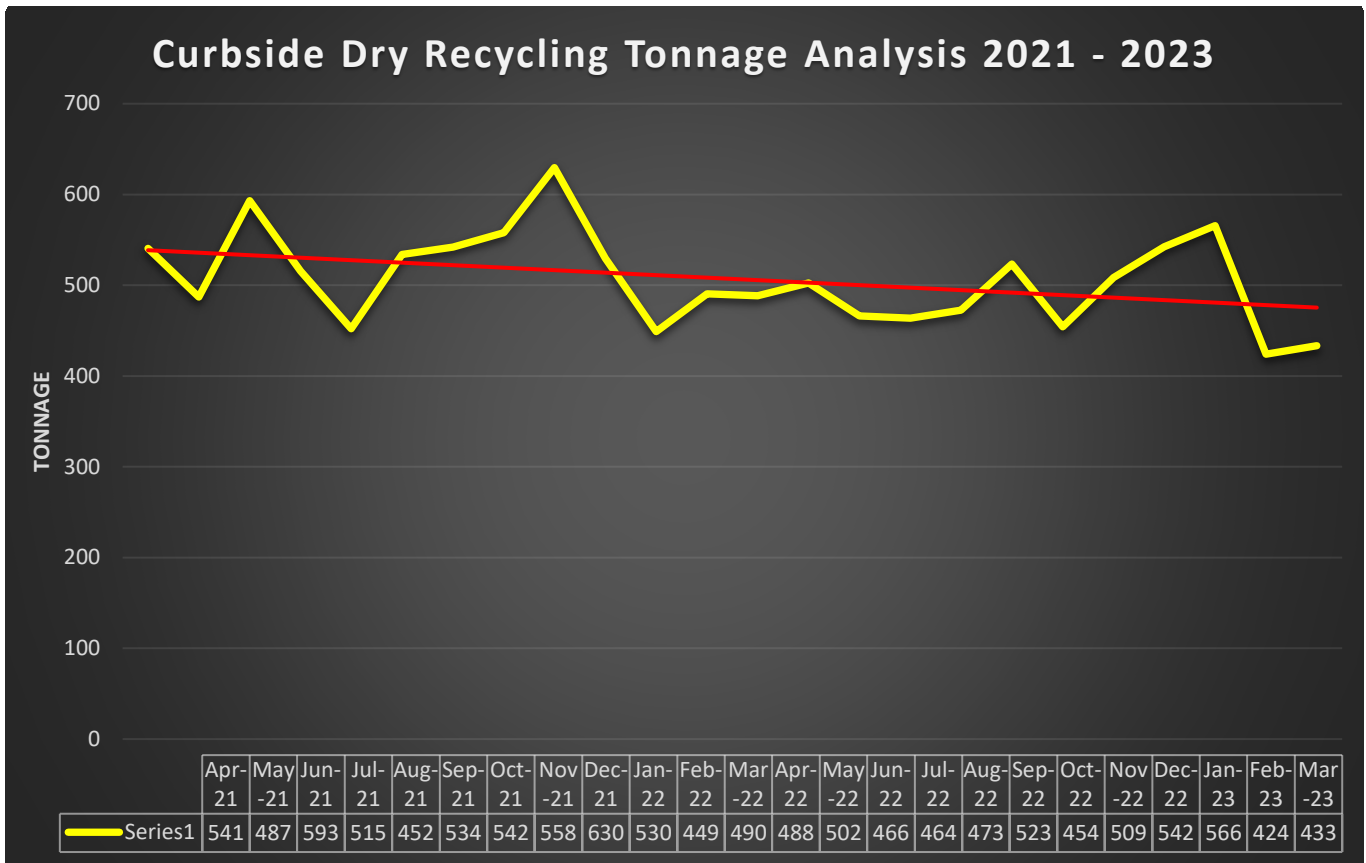
- 5.18 Using the same vehicles as the residual domestic rounds, this service operates is based on a semi comingled system, utilising a 90-litre clear plastic sacks in single dwellings and 1100 litre communal bins located at flats. As with the residual waste, many of the residents use wheeled bins to store the waste, resulting in the crews having to reach into bins, on most occasions to the full depth of the bin to pick the bags out.
- 5.19 Data provided by the service shows that the service collected 8014 tonnes in 2021/22. The current recycling rate for materials collected in sacks, excluding glass and cardboard which is collected at bring sites in 2021/22, currently stands at 18.52%.
- 5.20 PI 03i the net cost of recycling per household figure submitted by the authority was excluded from the final report as part of the exclusion process due to the submission of insufficient data being for the indicator to be calculated. However, the exclusion report indicates that a cost of £17.95 per household had been submitted by the authority, indicating that the net cost of curbside recycling collections would be approximately £942,500.65 per year, based on a property count of 52,507.
- 5.21 Table 3 and fig 3 below shows monthly tonnages for the service for 2021/22 and 2022/23 and a graph plotting the trend line for this waste stream.

Table 3 - Curbside Recycling Monthly Tonnage:

Month	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Monthly Tonnes	540.72	487.18	593.24	515.43	452.26	533.76	541.96	557.74	629.60	529.72	449.10	490.48

Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly Tonnes	488.46	502.48	466.38	463.68	472.62	523.28	454.14	508.57	542.36	565.68	424.06	433.26

Fig 3 - Curbside Dry waste Recycling Monthly Tonnage Graph 2021 – 2023:



- 5.22 Table 3 and figure 3 above indicates that there is some cause for concern as the collected tonnage trend for the whole two-year period clearly shows a downward trend. This combined with the steady or only very slight downward trend in the levels of residual waste being collected, must be a point of concern for the service as this clearly indicates that something is not happening quite as well as it should.
- 5.23 With the effects of material light weighting and if the curbside recycling system was working effectively, the trend in residual waste tonnages would be clearly and significantly downwards, as more waste is diverted from the residual waste stream to recycling. The tables above clearly indicate that either residents are not effectively recycling all the materials they can or the way in which the two waste streams are collected are working against each other.
- 5.24 Figure two below shows a picture taken on the site visit with crews, of waste after it had been placed into the back of the vehicle and clearly shows that recyclable materials is being disposed of through the residual system daily. This situation was observed on every one of the four individual vehicles seen on the site visits.

Fig 4 Collected waste in the hopper of the vehicle following collection:



Curbside Organic Waste Service

- 5.25 Sevenoaks provides a curbside garden waste collection service which is carried out on a two weekly collection frequency. The service utilises 240 litre wheeled bins provided to each relevant paying property with a bin costing £50 per year, which is renewable either at the Council offices or online. If residents have difficulty moving larger bins or have restricted storage space a smaller 140 litre bin is available for £35 per year.
- 5.26 The service is provided by 4 x 26 tonne RCV's, however, at peak times, due to the amounts of garden waste being placed out for collection, additional help vehicles are put to assist the rounds to complete. The collected waste delivered to Kent County Councils waste transfer station at Main Road, Sundridge for onward transportation to the processing facility.
- 5.27 A total of 11,903 properties signed up to receive garden waste bins in 2021/22 with an unknown number of residents opting to use the brown paper garden waste recycling bag system. The use of wheeled bins increased in 2022/23 by an additional 3,148, making the total number of bins used at 15,051, in addition to the currently unknown number using the bag system.
- 5.28 As a result of this, the service collected 8,014 tonnes of green waste in 2021/22 and 6,790 in 2022/23 some 1,224 tonnes less than the previous year which is reflected in the graph shown in figure 5 below, which shows a significant downward trend through both periods.
- 5.29 Table 4 and figure 5 below, shows an analysis of tonnage data for the years 2021/22 and 2022/23.

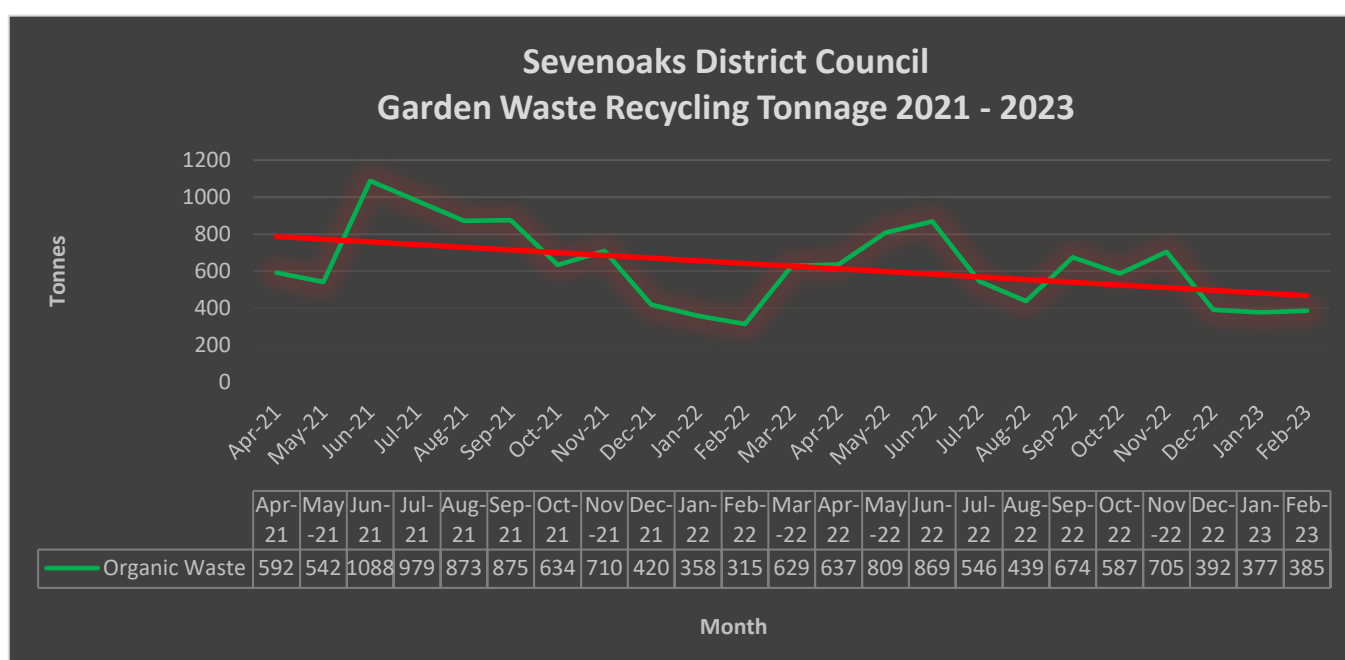
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Table 4 - Curbside Green waste Monthly Tonnage:

Month	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Monthly Tonnes	592.26	541.94	1088.08	978.78	872.98	875.16	634.40	710.29	419.58	357.87	314.70	628.86

Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly Tonnes	636.62	808.82	868.72	545.63	438.99	674.34	586.52	705.22	391.80	377.07	385.48	TBC

Fig 5 - Curbside Garden Waste Monthly Tonnage Graph 2021 – 2023:



5.30 Looking at table 4 and fig 5 above, the first thing that is obvious is that the service has quite fluctuating levels of waste arising throughout the period showing similar characteristics to other green waste services observed by the consultant, with the seasonal peaks and troughs usual in a service like this. However, the most significant aspect is that the trend in green waste tonnage collected over the period is increasingly moving downwards.

5.31 It is obvious from the figures for 2021/22 that the service was severely impacted by the effects of the lockdown periods throughout the pandemic. With tonnages making a slight recovery in mid-2022, however the overall trend over the whole period remains downwards with no obvious change in the trend since normal operations resumed.

5.32 Because of the nature of garden waste, being bulky and heavy, it does in many authorities, as it does in Sevenoaks, significantly contribute to the overall tonnage recycled by the authority. In Sevenoaks, garden waste tonnage contributes almost 50% of the overall tonnage collected, however, in the last year 2022/23, tonnages do appear

to be significantly reduced, particularly in the high season period May to August 2022 compared to the same period a year earlier in 2021.

Glass and Cardboard Collections (Bring Facilities)

5.33 Glass and paper and card are not collected within the clear sack system, in part due to its bulky and heavy nature but also by collecting these materials separately, they can demand a higher value, if the market is right.

5.34 These materials are collected on traditional bring sites located around the area. There are 45 sites that have glass collection banks on them and 22 paper and card. Table 5 and 6 and figs 6 and 7 shown the tonnage and trend figures for the years 21/22 and 22/23.

Table 5 – Glass Bring Site Monthly Tonnage 2021 – 2023:

Month	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Monthly Tonnes	45.960	38.333	41.490	31.840	49.722	30.660	37.160	11.150	41.082	49.641	30.580	37.460
Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly Tonnes	37.520	31.740	37.960	37.960	34.080	45.600	43.960	37.297	32.240	62.560	35.960	39.420

Fig 6 – Glass Bring Site Monthly Tonnage Graph 2021 – 2023:



5.35 It is interesting that recycling at bring sites, which historically had waned in Councils because of the introduction of curbside recycling system has to a degree been successful in Sevenoaks. Glass tonnages fluctuate a little but overall, the trend in tonnage is an upward one, in stark contrast to other areas of the service.

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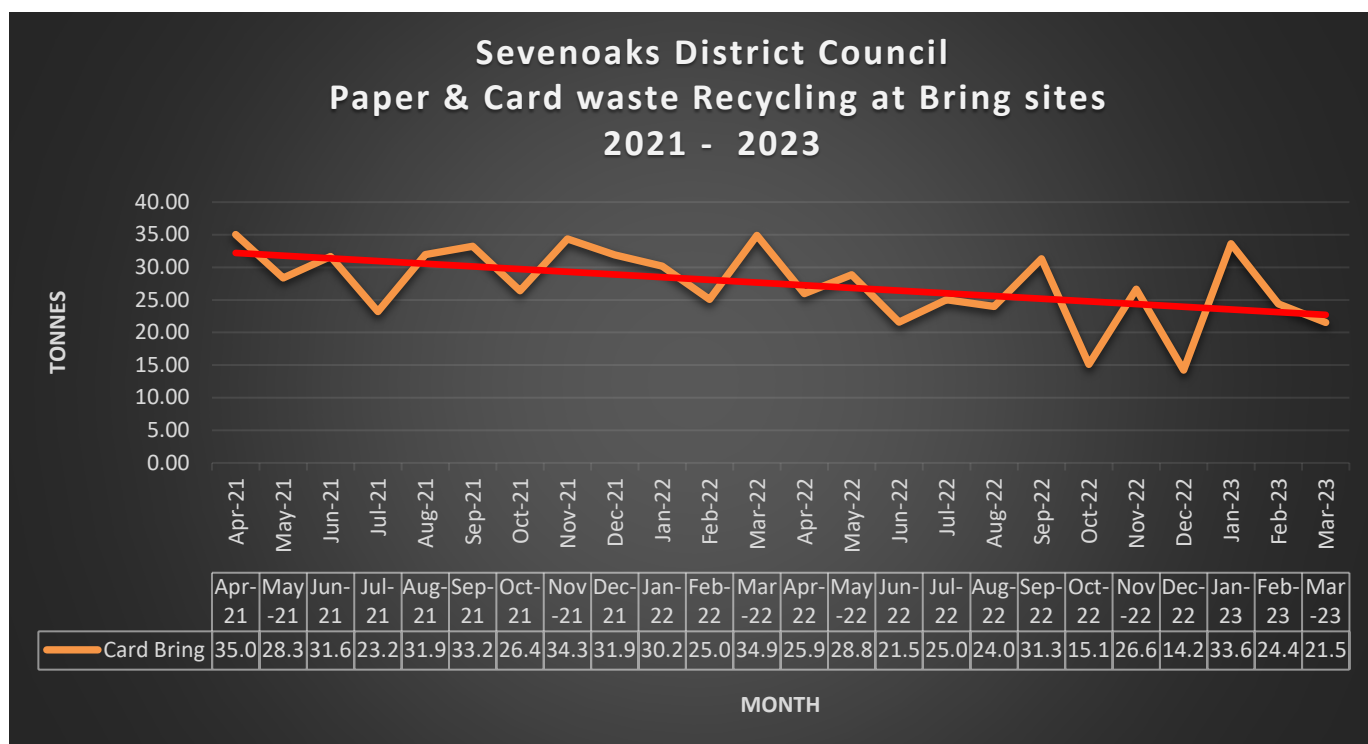
5.36 Table 6 and figure 7 below show the tonnages and trend for paper and cardboard which unfortunately has over the period taken a considerable downward trend. This was observed to a degree during the site visits where considerable amounts of cardboard was observed in the residual domestic portion of the collection vehicles, as seen in one of the photos in figure 4.

Table 6 – Paper & Card Bring Site Monthly Tonnage 2021 – 2023:

Month	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22
Monthly Tonnes	35.04	28.37	31.67	23.22	31.96	33.22	26.41	34.37	31.92	30.20	25.09	34.91

Month	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Monthly Tonnes	25.98	28.87	21.58	25.06	24.01	31.33	15.10	26.66	14.23	33.62	24.41	21.56

Fig 7 – Paper & Card Bring Site Monthly Tonnage Graph 2021 – 2023:

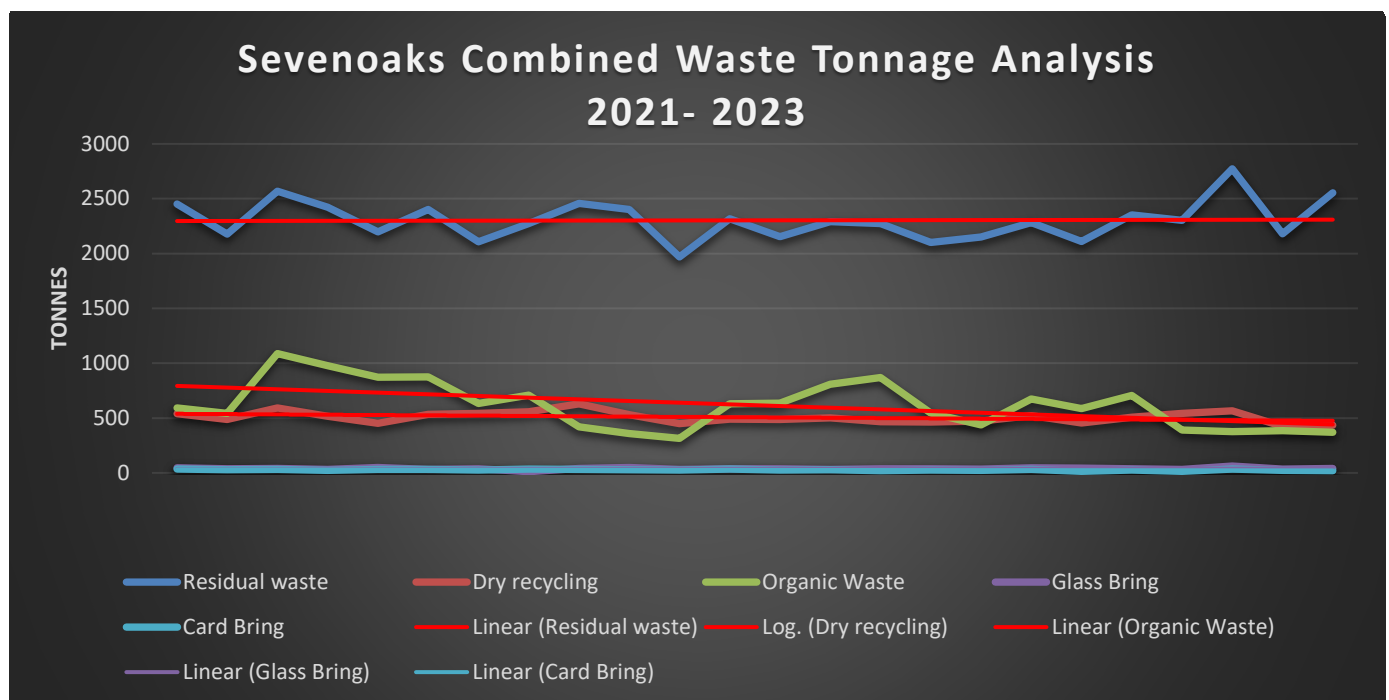


Analysis

5.37 Fig 1 showing the trend in tonnage of residual waste, shows only a very slight downward trend but in real terms a reasonably steady level of waste across the whole two-year period. In contrast the only material showing any kind of upward trend is the glass which is collected at bring sites. However, even this is only a slight upward trend. All other recyclable materials are showing a protracted and significant downward trend and, in some cases, significant reduction in tonnages over the period.

- 5.38 This is to some degree confirmed by the league table published annually on the LetsRecycle.com website which is derived from data collected from Waste Data Flow for the period covering the financial year 2020/21 and 2021/22, which gives a league table showing the position in the league table of and total percentage of household waste recycling, composting and reused for 351 English local authorities.
- 5.39 It shows that between April 2020 and March 2021 Sevenoaks was placed in 234th place out of 338 Local authorities in England with a recycling rate of 36.6%. The same data and league table for the period covering the financial year 2016/17, shows that between April 2021 and March 2022 Sevenoaks improved only very slightly and was placed in 212th place out of 333 Local authorities in England with a 38.8% recycling rate.
- 5.40 Figure 8 below shows a comparison of all material streams and their individual trend lines. It clearly shows the trend for the green waste recycling rising and the residual waste and dry recycling trends moving downwards with the decrease in dry recycling appearing to be greater than the residual waste.

Fig 8 – Combined Service Tonnage Graph:



- 5.41 The service is clearly achieving extremely high levels of service delivery by delivering a weekly collection of unrestricted amounts of waste; however, it is failing dramatically to achieve the high levels of recycling required to meet the Council’s current obligations and targets.
- 5.42 The current bring system for glass is the only area of the service where any significant gain is being made. All other areas are either flat lining in trend or showing a decrease in tonnages over the last two years.

Food Waste Collections.

- 5.43 SDC currently does not currently provide any level of food waste recycling collection. All food waste passes through the current residual system and is placed in black sacks. However, it should be noted that this material stream does pass through a process that produces green energy, as the food waste would have, had it been processed separately.
- 5.44 Under proposal within the Resources and Waste Strategy for England, it is proposed that every household and appropriate business within an authority's area, be provided with a food waste collection on a weekly basis. As food waste is a household waste, it cannot therefore be charged for, therefore, it must be assumed that this service would need to be provided by the council free of charge for all households with a possible charge to businesses.
- 5.55 Capturing this waste stream will require the implementation of a dedicated collection service operating on a weekly basis and would require significant investment in additional vehicles and crews to facilitate the collections incurring the additional associated costs.
- 5.56 This material could be processed through an anaerobic digestion plant if available but could equally be delivered to an in vessel composting facility to be mixed with green waste before processing.
- 5.57 Fortunately, as a WCA, the cost of processing these materials will be borne by Kent County Council, however, the cost of collections won't.

6.0 VFM – Value for money

- 6.1 APSE operates the largest public sector benchmarking facility in the UK with over 200 local authority members covering 17 service area including waste. Clients benefit from the mass of performance data contained within the Performance Networks benchmarking database. This is used to provide instant benchmarks to see value for money and where the authority may improve.
- 6.2 Sevenoaks have been members of APSE as an organisation for some time now, but not a member of Performance Networks (PN). As part of this project, Sevenoaks, joined PN for this service area and has contributed data for the first time this year.
- 6.3 Table 7 below shows data taken from the recently published 2021/22 Performance Indicator Standings Report for Sevenoaks and gives a snapshot of several key indicators taken from both the family group and whole service reports.

Table 7 - VFM Performance Comparison

Service	Indicator	Description	SDC 2021/22 Figures	APSE 2021/22 Excl CEC Ave in Family Group	APSE 2021/22 Excl CEC Top Quartile in family group	APSE 2021/22 Excl CEC Ave Whole Service	APSE 2021/22 Excl CEC Top Quartile Whole Service	Quartile Achieved
Recycling	PI 03f	Kgs of waste recycled per head of population	158.40	179.99	226.00	183.58	226.28	3
	PI 11	% Households Covered by curbside Recycling Collections	100%	99.97%	100%	99.18%	100%	1
	PI 03e	Tonnes of Domestic Waste Recycled per Household	0.36	0.41	0.51	0.42	0.51	3
	PI 12b	% Household waste collected that is actually composted	17.22%	18.98%	24.24%	18.51%	23.83%	3
	PI 02c	Cost of refuse collection service per household (Excl landfill tax, disposal & CEC)	£76.37	£71.46	£58.11	£75.92	£58.11	3
	PI 02d	Cost of refuse collection per head of population (Excl landfill tax, disposal & CEC)	£33.53	£31.68	£26.53	£32.80	£26.53	3
	PI 22c	Missed domestic residual waste collections (full year) per 100,00 collections	2.37	57.50	10.02	91.49	41.13	1
	PI 22e	Missed separate recycling collections (full year) per 100,00 collections	2.37	52.21	7.88	62.15	32.90	1

Quartile 1 = high performance – Quartile 4 = low performance

6.4 The PI standing report for 2021/22 presents a mixed picture for the service with some areas performing well and other areas not so well.

6.5 Areas where the service did not perform well included:

- The cost of refuse collection per household (PI 02c) and the cost of refuse collection per head of population (PI 02d), shows the service to be in quartile 3 for both indicators, performing poorly in both the family group and whole service.
- Tonnes of domestic waste recycled per household (PI 03e) also achieved Quartile 3 status in both the family group and whole service.
- The percentage of household waste actually composted (PI 12b) also achieving quartile 3 status in both the family group and whole service.

6.6 Areas where the service performed well included:

- The percentage of households covered by curbside recycling collections (PI 11) which achieved top quartile performance.

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- Missed domestic residual waste collections (full year) per 100,000 (PI 22c), achieving quartile 1 performance in both the family group and whole service.
- Missed separate recycling collections (full year) per 100,000 (PI 22e) also achieving quartile 1 performance in both the family group and whole service.

6.7 The full PI standing report can be seen in Appendix 1

7.0 Task and Finish

- 7.1 Traditionally in the UK, task and finish is the term for a way of being paid by completing a task rather than by hour. For example, a refuse collection team are contracted to work 5 days a week, 7.5 hours/day. Each day's collection route, made up of a balanced number of properties, is known to represent 7.5 hours work on average. If on any day they work extra fast and finish their route after 6 hours, then they can finish for the day, go home, and will still be paid for 7.5 hours.
- 7.2 This is the system used by several Council's including Sevenoaks. However, there are some issues with Task and Finish, with in many cases unions and Council's expressing concerns about the use of task and finish because by its very nature it encourages staff to take short cuts and potentially work in an unsafe manner.
- 7.3 There are several variations to task and finish, with Sevenoaks utilising a reasonably standard system used across many Councils. What is considered a standard task and finish system is where crews work on a single unit task and finish with teams who complete early, returning to the depot and going home.
- 7.4 These teams can and often do leave their fellow team members to fend for themselves regardless of what has happened on the service during the day, with many teams reportedly returning to the depot early.
- 7.5 Task and finish can without doubt be divisive, it encourages teams to operate in a way that is unsafe with staff running whilst pulling bins, collecting roads that should be collected single sided because of their high levels of traffic, double sided and not using reversing assistants when vehicles are moving backwards. All which was observed during the site visits with the supervisor.
- 7.6 Another issue which causes confusion is allowing team members to be picked up on the round and dropped off on the round, rather than having to come into the depot at the start and finish of the day. This alone can cause difficulty in staffing rounds if say for example a team member who is normally picked up on the round does not appear for their shift, leaving a crew shorthanded until a replacement can be taken out by one of the supervisors.

8.0 TEEP Assessment

Waste (England and Wales) (Amendment) Regulations 2012:

- 8.1 The Waste (England and Wales) (Amendment) Regulations 2012 came into force on the 1st of October 2012 and applies across all areas of the waste and resource management sector. It also impacts on the whole of the supply chain. This includes all waste collected by local authorities (household waste, bulky waste, commercial and industrial waste and street cleaning waste) regardless of the collection methodology.
- 8.2 Regulation 12 specifically places a duty on authorities to ensure that they apply the waste hierarchy to their services, where reasonable, when designing and implementing waste management systems.
- 8.3 When applying this, attention should be given to achieving the best environmental outcome. However, the directive does recognise that for some waste streams there may be a need to deviate from the priority order of the hierarchy, as long as this can be justified, in order to ensure this is achieved.
- 8.4 The regulations also make specific reference to the separate collection of waste and amended the Waste (England and Wales) Regulations 2011 by changing regulation 13. The changes to Regulation 13 mean that from 1st of January 2015, waste collection authorities must collect the following materials separately (paper, metal, plastic and glass).
- 8.5 A significant part of this duty is that from that date, all waste collection and unitary authorities should when making arrangements for the collection of such waste, ensure that those arrangements are by way of separate collections.
- 8.6 The duty applies to waste classified as waste from households as well as waste that classified as commercial or industrial waste.
- 8.7 All waste collection authorities were required to have evaluated their individual compliance before the 1st of January 2015 deadline. This is known as a TEEP Assessment. The Waste and Resources Action program (WRAP) have developed a Route Map, which is decision support tool that provides a clear, step by step process for local authorities to follow to help them decide whether they are compliant or need to consider making changes to their service.
- 8.8 The consultant has been informed that Sevenoaks has never carried out TEEP assessment on its current service.
- 8.9 It is recommended that A TEEP Assessment be carried out as a priority. This will establish if the way the service currently operates in in fact the most technically, environmentally, economic, and practical method of collecting waste in Sevenoaks. This will also perhaps give a steer on what may need to be done with the service, should the changes to

potential collection methodologies, be imposed on local authorities, as they currently appear in the Environmental Improvement Plan 2023.

9.0 Risks

Removal of Recycling Credits by Kent County Council

- 9.1 Recycling credits are paid by KCC to third parties that collect items from the municipal waste stream and reuse or recycle them. Under the system, which was amended by the Government in 2006 to reflect the introduction of other legislative drivers to boost recycling and reuse, Waste Disposal Authorities (WDAs) like Kent County Council could if they choose, pay credits to Waste Collection Authorities (WCAs) like Sevenoaks, when they divert waste from landfill for recycling or reuse.
- 9.2 Credits can also be paid by Sevenoaks to third party partners to encourage them to recycle more. The value of the recycling credit is worked out as equivalent to the average per tonne cost of the WDAs most expensive form of waste disposal, taking account of inflation. The 2006 changes also gave councils the option to introduce alternative arrangements to just using the statutory recycling credits system, and several councils have chosen to do this.
- 9.3 One recently developing area of concern is the number of WDAs now informing WCAs that they are ceasing to pay recycling credits which in some cases has prompted Councils to consider charging for their green waste collections to cover the potential loss of recycling credit income and also to consider its effect on recycling budgets as recycling credits can in some material markets mean the difference between the Council having to pay to recycle some materials or just covering their cost.
- 9.4 Although there have been no indications at this time that Kent County Council are intending to do this, we are informed that it is under review, it would therefore be prudent to be aware that in the current financial situation this is not impossible and for the Council to consider now how it would deal with such an event.

Legislative Changes

The Governments 25-year Environment Plan

- 9.5 Launched the then Prime Minister Teresa May in January 2018, the 25-year Environment Plan was developed with the aim of minimise waste, reuse materials as much as possible and manage materials at the end of their life to minimise the impact on the environment. The plan aimed to do this by:
 - Working towards the ambition of zero avoidable waste by 2050.
 - Working to a target of eliminating avoidable plastic waste by the end of 2024.
 - Meeting all existing waste targets – including those for landfill, reuse and recycling and developing new future targets and milestones.

- Seeking to eliminate waste crime and illegal waste sites, delivering a substantial reduction in litter and littering behaviour.
- Significantly reducing and where possible preventing all kinds of marine pollution, in particular material that came originally from land.

Resources and Waste Strategy for England

- 9.6 The Resource and Waste Strategy for England is still in its consultation phase and so far, nothing proposed has been confirmed as policy. It has been specifically designed to support the 25-year Environmental Plan, however, if it is delivered as proposed, it will have significant operational and potentially financial implications for many local authorities.
- 9.7 Recycling rates have risen from 11% in 2001 to 45.2% in 2017, however since 2017 rates stagnated around 44 - 45%. Some recycling rates have improved but some have seen falls in recycling and quality of materials collected and some local authorities are still not collecting food waste.
- 9.8 Landfill Tax is still a real driver to increase recycling rates, however with plastics now being high on public agenda, mainly through the blue planet effect, with different types causing confusion and the 2018 Chinese ban on post-consumer contaminated plastics creating an ever-growing problem for the UK waste management industry causing.
- 9.9 Contamination in domestic recycling schemes is still a massive problem with ever growing demands to improve collected materials quality, increase demand amongst UK firms and meeting higher quality demands for export. In all there is a general feeling that there needs to be greater consistency in materials collected and how it is collected.
- 9.10 The Resource and waste Strategy for England has two objectives:
- To maximise the value of resource use; and
 - To minimise waste and its impact on the environment.
- 9.11 To achieve this the Government has proposed several areas for consultation including.
- A consultation on a tax on plastic packaging containing <30% recycled content.
 - A consultation on increasing the plastic carrier bag charge to 10p and extending it to small shops.
 - A consultation on banning the most problematic plastic products (e.g., straws, cotton buds, stirrers).
 - Extended Producer Responsibility.
 - The implementation of Deposit Return Schemes (DRS).
- 9.12 Subject to consultation, legislation to:
- Specify a 'core set' of materials that local authorities will be required to collect.
 - Determine which collection systems drive quality.

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- Introduce non-binding performance indicators for local authorities; and
 - Introduce minimum service standards to improve the quantity and quality of what is recycled.
- 9.13 With respect to the collection of food waste, the strategy proposes that every household and appropriate business has a weekly, separate collection of food waste from 2023 (subject to consultation).
- 9.14 With many local authorities now charging for garden waste collections the proposal for every household to receive free garden waste collections (subject to consultation) will obviously have financial implication.
- 9.15 Also included in the proposal are:
- Timings for changes
 - Funding for changes
 - Implications for Councils
- 9.16 The UK Government published four consultation papers on the key policy proposals in the Resources & Waste Strategy. These were open for consultation until 13th May 2019.
- 9.17 The core set of materials proposed by the strategy includes:

Material	Current Target	Proposed Target
Paper & Card	82%	85%
Glass	70%	75%
Aluminium	55%	60%
Steel	75%	80%
Plastic	50%	55%
Wood	30%	30%

- 9.18 Potentially, there are wide implications for a range of stakeholders and not just the waste collection authority. The management of packaging waste currently costs local authorities in the region of £820m per year, which could rise significantly because of amending collection systems to meet the quality demands proposed in the strategy.
- 9.19 It is proposed in the strategy that local authorities will be paid by producers for collecting and managing packaging that arises in household waste with local authorities having to collect all recyclable packaging that is identified for collection through the household collection services. In addition, collection services will have to meet with any minimum collection standards required in each nation which is intended to lead to more consistent service provision across the country.
- 9.20 It is assumed that these changes will give waste companies the confidence to invest in collection services and recycling infrastructure. Pre-processors and manufacturers can

expect to have greater confidence in the supply of materials, resulting from the adoption of more consistent approaches to collecting recyclable materials and consumers will have clarity on what packaging items can be recycled and those that can't be recycled.

- 9.21 For items that can be recycled, the strategy aims to ensure that consumers will be able to recycle them wherever they live. Combined with more consistent collection services, this will reduce confusion and contribute to more packaging being recycled, less contamination and hence better-quality materials.

Incineration Tax

- 9.22 If measures to drive up the quality of materials and recycling rates contained in the Resource and Waste Strategy for England fails, the UK Government will consider introducing a tax on incinerated waste. The strategy says that incineration is expected to continue to play a "significant" role in ensuring that rubbish is not sent to landfill with 41% of municipal waste currently being burnt and (EfW) plants in England contributing about 3.4 per cent of the nation's total renewable electricity supplies.
- 9.23 However, if the measures included in the strategy fail to increase the quality and quantity of recyclable waste, a tax on that waste sent to energy from waste will be considered as a tactic to increase separation of recyclables.

The Environmental Improvement Plan 2023

- 9.24 The Environment Improvement Plan 2023 is the first 5-year review of the Governments 25 year Environmental Planned reinforces the intent of the plan which sets out the framework for improving our environment in the future.
- 9.25 The 25-year plan sets out 10 goals which are listed below. The goal with the potential to affect this service is goal 5 maximising our resources and minimising our waste.

The 10 environmental goals are:

- Goal 1: Thriving plants and wildlife.
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides.
- Goal 5: Maximise our resources, minimise our waste.
- Goal 6: Using resources from nature sustainably.
- Goal 7: Mitigating and adapting climate change.
- Goal 8: Reduced risk of harm from the environment
- Goal 9: Enhancing biosecurity.
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

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- 9.26 The goal aims to improve our overall environment by increasing recycling, improving air quality, dealing with our waste better, reducing the amounts of waste we produce and to improve the current producer responsibility legislation.
- 9.27 The plan sets out how the Government intends to achieve this which is listed below:
- To work with business to implement packaging extended producer responsibility from 2024 so that polluters pay to recycle packaging.
 - To introduce a deposit return scheme for plastic and metal drinks containers from October 2025s to drive higher recycling rates.
 - To implement consistent recycling between different councils, to boost recycling rates.
 - To ban the supply of single use plastics like plates and cutlery from October 2023. Also, to explore options for further, including with stakeholders, for the potential for technical innovation in the production of coffee cups, and behavioural science in how they are used.
- 9.28 In addition to the cost of implementing some of the possible service changes, some of the requirements, such as the implementation of a 'Deposit Return Scheme' (DRS) have the potential to reduce the tonnage available to be collected on the curbside by the council, potentially making it impossible to reach recycling targets set by the Government.
- 9.29 It is believed from the DRS scheme could operate something like the current bring system on supermarket car parks with the possibility of there being an incentive to recycle such as vouchers for money off etc. This could encourage people to take their recycling to the DRS points to gain whatever financial or reward for recycling is in place rather than having the council collect it. There is some debate as to how this will work, who provides the incentive and who gets the value of the materials and recycling credits if available.
- 9.30 The Government were intending to make an announcement in January 2023 in respect of what would be expected of local authorities in terms of collection and recycling changes, however, this has been delayed indefinitely with no further announcements.

10.0 Operational Options for Consideration

4 Day Working Week (Tuesday to Friday)

- 10.1 There are Councils that have very successfully implemented working across a 4-day week, Tuesday to Friday (9.25 hours per day). This has obvious benefits in removing the overtime burden on the service for the 7 bank holidays planned each year (normally 8

per year) and allows a day free when vehicle maintenance and repairs could be carried out without interruption.

- 10.2 This system could easily be used alongside any of the other proposals for e.g., working a 4-day shift cycle or 3 and 4 weekly collection frequencies. However, this will require very accurate round configuration, strict management, and regular monitoring.
- 10.3 There would be a need for consultation and discussions with the staff and potentially trade unions around the increased working hours per day and the possible issues around health and safety. Therefore, there would need to be some negotiation and explanation around how the service would be operated and the benefits to both staff and the operation working 4 longer days.
- 10.4 There may also be other considerations identified through the Council’s HR section regarding any locally agreed terms and conditions that may be in place.
- 10.5 The main saving from this exercise is the current cost of paying the team’s overtime to work the 7 bank holidays (excluding Good Friday). Table 14 below shows the estimated saving the authority could make based on paying time and a half. Based on pay rates for drivers and loaders provided by the authority, the potential saving in overtime payments to the authority is estimated to be circa £18,933. The calculations are shown below. Any additional bank holidays would produce an additional £2,704.79 savings based on these figures.

Table 14 – Estimated revenue saving from moving to a 4-day working week:

	Unit	Unit Day Rate	Unit Rate per Year	No Bank Holidays	Total Est Saving
Driver	22	£55.43	£1,219.35	7	£8,535.45
Loader	32	£46.42	£1485.44	7	£10,398.08
Total Saving					£18,933.53

Introduction of a 5 Day Shift Cycle for Residual Rounds

- 10.6 A sustainable option to be considered is the introduction a 5-day shift system.
- 10.7 In making the most productive use of resources and labour, authorities across the country have seen the need to review shift patterns as an operating option.
- 10.8 Already, shift systems are in operation in many areas of the country including the capital e.g., in the City of Westminster as well as the Corporation of London. Both authorities collect a large proportion of waste produced by residents in the evening and through the night, enabling the Councils to “double shift” their vehicles reducing the cost of vehicle provision whilst maximising the use of the resource.

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- 10.9 The collection of waste in the evening and the night in the capital has proved to be a sustainable method of collecting waste due to reduced traffic and pedestrian levels which has improved productivity of the waste collection service.
- 10.10 However, it is recognised that a night shift system in Sevenoaks may not be the preferred choice due to the rural nature of parts of the district; however, SDC could introduce a shift system over a 5-day period with waste being collected on either a morning or an afternoon / evening collection shift cycle.
- 10.11 Based on a 5-day 37-hour shift system, this could be deployed as follows:
- Shift one could start at 5.00am and finish at 12.30pm four days of the week and finish at 12.00pm on the fifth working day.
 - Shift two could start at 1pm and would finish at 8.30pm four days of the week and would finish at 8.00pm on the fifth working day.
- 10.12 The advantages to be gained from this change in service provision is the potential savings in resources in terms double shifting the collection vehicles. Currently, SDC's waste collection service operates from 07.00 and finishes at 1500 Monday to Thursday and 07.00 to 14.30 on Fridays, working on a five day a week basis (37 hours). Indicating that the current fleet is potentially parked up for approximately 8 hours per vehicle per day or 40 hours per vehicle every week (Potential operational hours).
- 10.13 This suggests that at this time and based on a possible 15-hour day working window (5am to 8pm) for double shifting the teams, that the current vehicle resource is parked up for just under 50% of the time potentially available for work.
- 10.14 By switching to shift working, full utilisation of front-line vehicles and equipment will be achieved, and the Authority could consider downsizing their front-line fleet of residual collection vehicles by a little over half, allowing for the fact that spare vehicles will still be required.
- 10.15 In addition, this would offer longer term financial benefits in the reduction in fleet costs e.g., vehicle purchase and depreciation of fleet assets. However, the downside to this would be an increased maintenance costs in using the single fleet of vehicles, working two shifts a day as opposed to one.
- 10.16 Therefore, in considering this option the authority must consider the associated additional service and MOT scheduling and vehicle maintenance cost. A more detailed fleet analysis may be required to identify the right options for the authority in terms of vehicle types and costings.
- 10.17 This option would require very little infrastructure change and would fit in with the potential re-running of the route optimisation exercise where this scenario could be modelled before any firm decision was made.

- 10.18 However, in addition to modelling this scenario before considering its implementation there are several other considerations that would need to be taken into account and are identified below.

Operational issues to be considered.

- 10.19 Prior to the implementation of a waste collection shift system, a campaign would need to be rolled out to all residents across the SDC area advising them of the proposed changes to their waste collection services e.g., the proposed shift/working patterns, changes in timings to place bins out for collection etc.
- 10.20 New risk assessments and route risk assessments will need to be completed in lieu of the changes, particularly regarding early morning and evening working during Autumn/Winter periods and of course inclement weather.
- 10.21 New residual waste collection routes will need to be planned and produced prior to any service change being mobilised. Vehicle access must be considered during the out of hours where vehicle parking might be encountered determining the route and time of service in certain areas.
- 10.22 As the difficult to access properties would not be included in the shift system this would not apply to them.

Logistics/transport of waste to transfer/treatment facilities out of normal hours

- 10.23 Prior to the implementation of any shift working arrangements, The Authority must ascertain whether the current disposal facilities used by the service would be available to them including ensuring that the sites have the relevant operating licenses which covers the planned working times of the shift system to both accept and process waste and what if any additional costs would be.

Shift Supervision

- 10.24 Staff supervision would also need to be restructured and supervisory staff rotated e.g., working on a shift rotation for example, week one - day shift and week two - evening shift.
- 10.25 This would provide the supervisors with an all-round knowledge of all shift patterns and would help them to deal with operational problems which may arise.

Innovation and sustainability

- 10.26 The changes to the residual waste service through a shift pattern system can be further harnessed through the introduction of hybrid waste collection vehicles, which would demonstrate SDC's commitment to innovation and sustainability.
- 10.27 Hybrid waste collection vehicles would be of most benefit when collecting waste in the early morning and evening periods, helping to reduce noise pollution as well as reducing carbon emissions. The Corporation of London have already invested in hybrid waste collection vehicles which collect waste in central London both in the evening and through the night.

Underground Waste Systems

- 10.28 APSE has carried out extensive research into the potential of using underground waste system both in urban and rural settings and both types of location can utilise this growing innovation.
- 10.29 Underground waste systems are widely used across Europe, however, there are an increasing number of local authorities in the UK looking at and installing this type of system.
- 10.30 Underground units can assist in overcoming some of the difficulties associated with above ground bins by increasing storage capacity in a single container out of sight below ground. There are several different systems available, being used in areas where there are flats or areas of high-density housing as well as rural location such as small hamlets and villages.
- 10.31 There are several types of system available, some comprising of a pre-cast concrete bunker set in the ground, a bin-liner which can be made of metal or HDPE (high-density polyethylene) which holds the waste and is located within the bunker. A surface access point which invariably looks like a normal on street litter type litter bin, which is located on a platform designed to blend in with the paved surroundings.
- 10.32 Access to the system can either be open access, in that there is no restriction on who is able to use the system or restricted access, where access is restricted to a number of residents by the use of a swipe card or RIDF fob. In either case this type of system can offer several advantages such as:
- Reducing the visual impact of existing wheeled bins or common place above ground bin storage compounds.
 - Potentially reducing collection costs due to the reduction in collection time because of the efficiencies of a smaller number of large waste containers opposed to a large number of smaller bins spread over a wide area.
 - A reduction in operational costs is because of the system potentially only requiring a single operative to make the collections, opposed to the normal 3 or more operatives required for the collection of what would be considered normal collection systems. However, health and safety must be considered at the design stage of the development and should consider the use of single operatives to allow for this saving to be made.

The introduction of recycling incentive schemes

- 10.33 Since the introduction of the Climate Change Act in 2008, the former labour government (pre-2010) looked to encourage Council's to enforce residents to reduce the amount of waste they produced. This, however, did not encourage or incentivise people to recycle and therefore in 2009, UK local authorities reviewed more sustainable options which encouraged residents to recycle their waste.

- 10.34 Once the coalition government came into power in 2010, their perspective on recycling changed from that of the former Labour government e.g., they wanted to incentivise people to recycle and encouraged more UK local authorities rolled out incentive schemes to increase recycling.
- 10.35 SDC does not have any form of incentive scheme in place at this time but as part of any future waste education and communications plan should consider how they could encourage greater participation in their recycling schemes.
- 10.36 The Case studies below give an example of how an Incentive Schemes (Recycle bank / Green redeem) can encourage improved recycling participation.

Case Study: The Royal Borough of Windsor and Maidenhead

- 10.37 In June 2009, The Royal Borough of Windsor and Maidenhead rolled out a recycling incentive scheme in conjunction with its green waste collection scheme to two hundred of its residents across the borough.
- 10.38 The incentive scheme chosen by Council was an American system called Recycle bank which works by means of a radio frequency identification device (RFID) tag being fitted to resident's blue coloured 240 litre wheeled bins for the deposit of their commingled dry mixed recyclables.
- 10.39 The Authority provided residents with the blue coloured 240 litre wheeled bin complete with RFID tag for the placement of their commingled dry mixed recyclables.
- 10.40 The weight of dry mixed recyclables collected per household is recorded through the RFID device and dependent on how much dry mixed recyclables a resident had recycled by weight, they could then redeem points towards buying household items from shops and outlets through coupons awarded to residents by the Royal Borough of Windsor and Maidenhead Council. The Council encourages residents to participate by using a 'carrot and stick' approach in that there is an 'upper limit' that residents can aim for to redeem the maximum number of points and vouchers for recycling the largest proportion of their domestic waste each month.
- 10.41 The commingled dry recyclables which can be placed inside the blue coloured 240 litre wheeled bin are paper, cardboard, glass, plastic e.g., HDPE, PET and TETRAPAK as well as aluminium and steel cans. If each household recycles as much of their domestic waste as possible, they will be eligible to earn up to one hundred and thirty-five pounds a year in vouchers and discounts from retail outlets.
- 10.42 The scheme has been introduced alongside the green waste collection scheme which combined can earn households up to a total of one hundred and seventy-five pounds in points each year. One hundred and thirty-five pounds for the commingled dry mixed recyclable and forty pounds for the recycling of their green waste.
- 10.43 Following the introduction of the Recycle bank scheme the Council saw a corresponding a first-year increase in the boroughs recycling rate of 4.5%.

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- 10.44 In response to the success of the dry recycling incentive scheme, the borough has since introduced a food waste collection service also using the Recycle bank scheme to incentivise households to recycle their food waste. Households are able to receive up to twenty-five points per month for segregating their food waste to be recycled.

Communications

- 10.45 The importance of education and communication to encourage participation in any scheme cannot be underestimated. The Council does have service information on the Council's website, albeit not very inspiring, however the Council also has quite an active and interesting looking Facebook page for recycling. The authority also makes use of Twitter, however looking at the feed, there is not a great deal of information on them about the recycling service.
- 10.46 There is a link on the Councils website direct to the award winning, Waste Partnership, Recycle for Cambridge and Peterborough (RECAP) website, which is very much based on the WRAP and Recycle Now theme, very colourful and engaging with links to educational and waste minimisation information.
- 10.47 It is true to say that for any type of recycling scheme to work, households need to be clear about what they can and cannot recycle, as well as why they should do it in the first instance. This can take many forms from operating a telephone hotline service, having a dedicated web page for information, delivering leaflets or newsletters, doing face-to-face education about the service, or liaising with local schools.
- 10.48 Content on the Councils website is controlled by the Councils policies which restricts the use of pictures etc, making it very difficult for the staff on the service to make the information contained on it engaging. The information on the website is presented in quite a bland way with little or no colour, Recycle Now iconology or pictures. If a similar approach to that taken on the RECAP site was adopted, using Recycle Now type iconology, this would make the site more aesthetically appealing and perhaps make people linger and read the information.
- 10.49 Other methods of communication include advertising on the sides of vehicles and on litter bins. Every letter or communication that goes out from the Council, regardless of its nature and origin should bare information about recycling in some form or another so that the constant drip message is maintained.

11.0 Consultants Direct Observations

- 11.1 As part of their ongoing service development programme, Sevenoaks have completed a full round reconfiguration exercise of its refuse and recycling service using the Webaspx route optimisation software. The review was informed that the project was not necessarily designed to reduce costs but rather to improve round efficiency. Neither was it designed to reduce the number of rounds on the service but was based more on vehicle efficiency by reducing fuel usage, emissions and distance travelled. It is suggested that all these things can help to reduce cost.

- 11.2 The service operates a task and finish system, along with the vehicles being fitted with trackers, which is an attempt to ensure that some level of monitoring of the service can be carried out and that drivers are compliant with their driver obligations. There are issues with task and finish, by the very nature of it, it is inherently difficult operationally to get crews to co-operate with each other and has proven to encourage unsafe working practices, with many Councils removing it in favour of standardised hours.
- 11.3 The round data supplied by the Council as shown in the Refuse and Recycling Collections Round Review report, states that there are 51,513 domestic properties in Sevenoaks. These at first glance, appear to be reasonably balanced rounds in terms of numbers of properties collected, however, there is some discrepancy in the data with the Councils GIS team stating that there are 52,507 domestic properties in Sevenoaks, a little under 1,000 more. This could be explained as new builds coming online; however, these should have already been built in through the route optimisation exercise.
- 11.4 The current round data, based on the experience of the consultant, suggests that individual team productivity is quite low in terms of the number of properties collected per round each day. There is no doubt that this is because of the current policy directing crews to remove all waste placed out for collection, rather than limiting residents to a single black sack or a smaller number of sacks. Even when compared to authorities using wheeled bins for example, property numbers per round still appear low.
- 11.5 The current collection methodology, collecting sacks on a weekly basis, on a task and finish regime, is a cause for serious concern around health and safety, with crews encouraged to run, cut corners, and carryout unsafe working practices, which were observed during the site visits, resulting in high levels of sickness and muscular skeletal injuries, in 2021/22 a total of 346.5 days lost and in 2022/23 a total of 556.5 days lost.
- 11.6 It is believed where appropriate, that rounds with an average number of properties per day of between 1,100 and 1,300 per day should be achievable in Sevenoaks, which would enable the authority to reduce the number of rounds across some areas of the service. However, to achieve this, changes to the current collection system, would need to be made.
- 11.7 The rural rounds are of particular concern as the service is currently driving collection vehicles on very narrow privately owned farm tracks. It is believed that this could be more efficiently achieved by investigating the possibility of end of lane collections.
- 11.8 This may be contentious, however, the risk to the Council in driving large vehicles down privately owned roads is clear. Many of these roads, particularly down to farms, can be unmade or in poor condition, potentially causing extensive and costly damage to the Councils vehicle. In addition, the Council uses large heavy vehicles which could be seen as contributing to the damage to these unmade roads, which could result in claims for damages from the landowner. End of lane collections would resolve this issue for both the Council and the resident.

Agenda Item 7

- 11.9 Without a doubt the methodology used to collect waste, on a weekly basis using sacks, is popular with residents and is a policy the currently Conservative controlled Council has pledged to continue. However, with new Government regulations on the horizon, the service may be required to change some aspects of the service to bring it in line with Governments 'simpler recycling' collection policies.
- 11.10 There is no doubt that the service cannot continue as it is, collecting unlimited amounts of waste for disposal and in so doing discouraging residents from separating their waste for recycling. The current collection methodology is not only outdated but is out of step with the rest of the country. It will not in any way assist the Council in achieving its recycling targets or to become a high performing authority.
- 11.11 WRAP carried out an options appraisal published in March 2021 where they recommended changes to the system including continuing the collection of residual waste using sacks but limiting the number of sacks allowed. The Consultant believes that this is flawed and should be changed to the use of a 240 or 180 litre wheeled bin.
- 11.12 WRAP also recommend collecting the current dry recycling materials in what are termed triple stacker boxes to keep them separate and for glass to continue to be collected as it currently is by means of bring facilities.
- 11.13 The Consultant believes that this system would work and would improve the quality of the materials collected for recycling. However, if the current waste collected for recycling is being processed and achieving a high level of recovery through the (MRF), placing this waste co-mingled in a wheeled bin would achieve the same goal with wheeled bins traditionally being cheaper to purchase than the stacker boxes.
- 11.14 WRAP recommend garden waste to continue as it does now, using the current wheeled bin configuration, however, the current unregulated use of sacks in addition to bins is an issue that needs addressing, as this can cause issues with round configuration, making it difficult to calculate how much waste is likely to be placed out for collection. Also, food waste is not collected at the present time but is highly likely to be a requirement in the future.
- 11.15 WRAPs recommendations are of course designed to ensure that the Council complies with what was thought would be required in the new standardised collection regime proposed by the Government, However, since the government's announcement in October 2023, this has now been thrown into doubt and the industry awaits new regulations on what is termed 'Simpler Recycling'.
- 11.16 The UK Government will at some point soon make its final decisions on how the new 'Simpler Recycling' collection methodology will look. At that point, Council's will no doubt be given a timescale in which to achieve those changes.

Appendices

Appendix 1 PI standings report 2021/22

Family group comparison

Refuse collection performance indicator standings 2021/22

Name of authority Sevenoaks District Council

PIN 4335

Family group R1

Performance indicator

Performance indicator	Number in group	Highest in group	Average for group	Lowest in group	Your output/score	Standing in group	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
Key performance indicators										
PI 02c - Cost of refuse collection service per household (excluding landfill tax, waste disposal and CEC)	15	£110.56	£71.46	£41.89	£76.37	12	£58.11	3	-	L
PI 03b - Tonnes of domestic waste sent/collected for recycling per household (Scotland only)	6	0.50	0.36	0.14	-	-	-	-	-	H
PI 03g - Tonnes of domestic waste sent/collected for recycling per 1,000 head of population (Scotland only)	6	239.05	164.26	64.82	-	-	-	-	-	H
PI 03e - Tonnes of domestic waste recycled per household	18	0.67	0.41	0.16	0.36	10	0.51	3	-	H
PI 03f - Kg of domestic waste recycled per head of population	18	300.73	179.99	75.42	158.40	10	226.00	3	-	H
PI 03h - Tonnes of domestic waste recycled per 1,000 head of population (Scotland only)	6	300.73	213.86	75.42	-	-	-	-	-	H
PI 03i - Net cost of recycling per household (excluding CEC)	13	£78.48	£34.71	£11.73	-	-	£20.62	-	-	L
PI 11 - Percentage of households covered by kerbside recycling collections	19	100.00%	99.79%	96.36%	100.00%	1	100.00%	1	-	H
PI 12a - Percentage of total municipal waste collected which is sent for recycling (Scotland only)	6	49.49%	39.58%	15.92%	-	-	-	-	-	H
PI 12b - Percentage of household waste collected which is actually composted	17	33.51%	18.98%	6.21%	17.22%	11	24.24%	3	-	H
PI 12c - Percentage recovery of energy from household waste collected (England and Wales only - unitary authorities only)	2	69.32%	40.70%	12.08%	-	-	-	-	-	H
PI 12g - Percentage recovery of energy from total municipal waste collected (Wales only)	-	-	-	-	-	-	-	-	-	H
PI 12f - Percentage of total municipal waste collected which is actually recycled (Unitary only)	8	64.52%	39.30%	18.08%	-	-	59.20%	-	-	H
PI 32a - Kg of residual household waste landfilled per annum per head of population (Unitary authorities only)	8	210.68	87.12	6.12	-	-	6.47	-	-	L
PI 32e - Tonnage of residual household waste sent to landfill per annum per 1,000 head of population (Scotland only)	6	357.22	217.86	143.53	-	-	-	-	-	L
PI 32d - Kg of residual household waste landfilled per annum per household (Unitary authorities only)	8	470.23	194.83	13.63	-	-	15.72	-	-	L
PI 32f - Tonnes of residual household waste sent to landfill per annum per household (Scotland only)	6	0.78	0.48	0.32	-	-	-	-	-	L

Notes:

- The Authority will only be ranked in family group if it has shown an output / score within the set parameters for the performance indicator.
- Quartile / percentile marks are only shown for those performance indicators for which there is a desirable achievement.
- Quartile marks are only shown for those performance indicators for which there are a minimum of 8 outputs / scores within the set parameters.

Family group comparison

Refuse collection performance indicator standings 2021/22

Name of authority	Sevenoaks District Council									
PIN	4335									
Family group	R1									
Performance indicator	Number in group	Highest in group	Average for group	Lowest in group	Your output/score	Standing in group	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
Other cost performance indicators										
PI 02d - Cost of refuse collection service per head of population (excluding landfill tax, waste disposal and CEC)	15	£50.65	£31.68	£19.12	£33.33	12	£26.53	3	-	L
PI 08c - Total labour costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	17	69.59%	52.91%	37.14%	42.90%	-	-	-	-	N
PI 10c - Transport costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	15	32.75%	22.10%	10.94%	-	-	-	-	-	N
PI 18c - Front line labour costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	17	63.59%	47.30%	29.94%	38.02%	-	-	-	-	N
PI 27 - Cost per household excluding trade waste costs	17	£106.95	£67.12	£31.56	£73.67	11	£53.98	3	-	L
PI 37 - Cost of domestic waste disposal per household	5	£59.12	£47.50	£38.63	-	-	-	-	-	L
PI 38 - Cost of municipal waste disposal per household	5	£64.62	£53.75	£43.09	-	-	-	-	-	L
PI 41a - Percentage change in total annual income generated vs. previous year	12	38.39%	10.98%	-9.23%	-	-	-	-	-	N
PI 41b - Percentage change in income generated from recycling vs. previous year	9	188.91%	39.96%	-16.53%	-	-	-	-	-	N
Customer Services performance indicators										
PI 15 - Quality assurance and consultation process	20	56.00%	22.70%	8.00%	35.50%	3	29.00%	1	-	H
PI 16 - Human resources and people management	20	74.00%	46.65%	10.00%	68.00%	2	58.00%	1	-	H
PI 33 - Community / customer surveys undertaken	6	97.00%	90.50%	78.00%	91.00%	4	-	-	-	H
Efficiency performance indicators										
PI 22a - Missed collections per 100,000 collections (full year)	18	199.05	65.56	1.88	2.37	2	13.83	1	-	L
PI 22b - Missed collections per 100,000 collections (April - September)	18	295.95	76.26	2.37	2.37	1	14.57	1	-	L
PI 22c - Missed domestic residual waste collections per 100,000 collections (full year)	16	284.53	57.50	2.37	2.37	1	10.02	1	-	L
PI 22d - Missed domestic residual waste collections per 100,000 collections (April - September)	16	136.66	54.07	2.37	2.37	1	15.28	1	-	L
PI 22e - Missed separate recycling collections per 100,000 collections (full year)	16	142.06	52.21	1.44	2.37	2	7.88	1	-	L
PI 22f - Missed separate recycling collections per 100,000 collections (April - September)	15	244.97	64.68	2.29	2.37	2	10.20	1	-	L

Notes:

- a. The Authority will only be ranked in family group if it has shown an output / score within the set parameters for the performance indicator.
- b. Quartile / percentile marks are only shown for those performance indicators for which there is a desirable achievement.
- c. Quartile marks are only shown for those performance indicators for which there are a minimum of 8 outputs / scores within the set parameters.

Family group comparison

Refuse collection performance indicator standings 2021/22

Name of authority Sevenoaks District Council

PIN 4335

Family group R1

Performance indicator	Number in group	Highest in group	Average for group	Lowest in group	Your output/score	Standing in group	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
PI 04a - Trade waste contracts (charged) as a percentage of available market	17	100.00%	22.24%	3.28%	10.07%	15	23.87%	4	-	H
PI 04b - Number of trade waste agreements for recycling (free or charged)	21	1,600	419	0	80	18	507	4	-	H
PI 04c - Percentage change in trade waste contracts (charged / non recycling)	15	33.33%	-2.46%	-38.80%	-	-	2.38%	-	-	H
PI 04d - Percentage change in trade waste contracts (all)	15	42.11%	0.26%	-36.10%	-	-	-	-	-	N
PI 35a - Litres of fuel used annually in refuse collection vehicles per 1,000 head of population	17	4,811	2,538	1,412	2,146	7	2,089	2	-	L
PI 20a - Staff absence (all employees)	14	12.73%	6.08%	0.00%	-	-	3.62%	-	-	L
PI 20b - Staff absence - days lost per FTE non covid only (Scotland only)(all employees)	5	30.00	20.11	11.59	-	-	-	-	-	L
Other recycling performance indicators										
PI 32b - Percentage of household waste sent to landfill per annum (Unitary authorities only)	8	69.59%	25.38%	1.51%	-	-	1.80%	-	-	L
PI 32g - Percentage of household waste collected for landfill per annum (Scotland only)	6	84.64%	56.56%	47.41%	-	-	-	-	-	L
PI 32c - Percentage of municipal waste collected for landfill per annum (Scotland only)	6	84.08%	60.42%	50.51%	-	-	-	-	-	L
Covid impact performance indicators										
PI 39a - Percentage of fleet which constituted additional vehicles for Covid precautions	8	32.43%	18.26%	7.41%	-	-	-	-	-	N
PI 40a - PPE and other covid related equipment as percentage of total expenditure	10	12.31%	3.26%	0.11%	1.01%	-	-	-	-	N
PI 42a - Agency/temporary/casual staff costs as percentage of total staff costs	17	34.34%	11.57%	0.87%	27.46%	-	-	-	-	N
PI 42b - Agency/temporary/casual staff costs as percentage of total expenditure	17	20.47%	5.90%	0.40%	11.78%	-	-	-	-	N
PI 45a - Percentage change in net operational expenditure	14	51.29%	4.65%	-28.36%	-	-	-	-	-	N
PI 46a - Percentage change in number of operational vehicles deployed	15	143.33%	10.17%	-29.69%	-	-	-	-	-	N
PI 46b - Percentage change in cost of operational vehicles deployed	12	72.64%	-0.52%	-95.04%	-	-	-	-	-	N

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Whole service comparison

Refuse collection performance indicator standings 2021/22

Name of authority	Sevenoaks District Council									
PIN	4335									
Performance indicator	Number in service	Highest in service	Average for service	Lowest in service	Your output/score	Standing in service	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
Key performance indicators										
PI 02c - Cost of refuse collection service per household (excluding landfill tax, waste disposal and CEC)	36	£150.36	£75.92	£41.89	£76.37	25	£58.11	3	-	L
PI 03b - Tonnes of domestic waste sent/collected for recycling per household (Scotland only)	10	0.54	0.38	0.14	-	-	0.50	-	-	H
PI 03g - Tonnes of domestic waste sent/collected for recycling per 1,000 head of population (Scotland only)	10	244.78	172.65	64.82	-	-	225.75	-	-	H
PI 03e - Tonnes of domestic waste recycled per household	49	0.73	0.42	0.16	0.36	29	0.51	3	-	H
PI 03f - Kg of domestic waste recycled per head of population	49	332.30	183.58	75.42	158.40	30	226.28	3	-	H
PI 03h - Tonnes of domestic waste recycled per 1,000 head of population (Scotland only)	10	332.30	220.25	75.42	-	-	285.56	-	-	H
PI 03i - Net cost of recycling per household (excluding CEC)	36	£92.80	£39.41	£11.73	-	-	£18.22	-	-	L
PI 11 - Percentage of households covered by kerbside recycling collections	49	100.00%	99.18%	86.82%	100.00%	1	100.00%	1	-	H
PI 12a - Percentage of total municipal waste collected which is sent for recycling (Scotland only)	10	49.49%	38.56%	15.92%	-	-	47.24%	-	-	H
PI 12b - Percentage of household waste collected which is actually composted	48	36.06%	18.51%	3.79%	17.22%	29	23.83%	3	-	H
PI 12c - Percentage recovery of energy from household waste collected (England and Wales only - unitary authorities only)	13	69.32%	46.60%	12.08%	-	-	57.43%	-	-	H
PI 12g - Percentage recovery of energy from total municipal waste collected (Wales only)	1	38.31%	38.31%	38.31%	-	-	-	-	-	H
PI 12f - Percentage of total municipal waste collected which is actually recycled (Unitary only)	23	64.52%	44.32%	18.08%	-	-	59.20%	-	-	H
PI 32a - Kg of residual household waste landfilled per annum per head of population (Unitary authorities only)	22	210.68	60.66	0.30	-	-	4.30	-	-	L
PI 32e - Tonnage of residual household waste sent to landfill per annum per 1,000 head of population (Scotland only)	10	357.22	243.70	143.53	-	-	182.56	-	-	L
PI 32d - Kg of residual household waste landfilled per annum per household (Unitary authorities only)	22	470.23	133.66	0.61	-	-	10.57	-	-	L
PI 32f - Tonnes of residual household waste sent to landfill per annum per household (Scotland only)	10	0.78	0.53	0.32	-	-	0.38	-	-	L
Other cost performance indicators										
PI 02d - Cost of refuse collection service per head of population (excluding landfill tax, waste disposal and CEC)	35	£53.79	£32.80	£18.83	£33.33	25	£26.53	3	-	L

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Whole service comparison

Refuse collection performance indicator standings 2021/22

Name of authority	Sevenoaks District Council									
PIN	4335									
Performance indicator	Number in service	Highest in service	Average for service	Lowest in service	Your output/score	Standing in service	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
PI 08c - Total labour costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	37	69.59%	51.12%	35.34%	42.90%	-	-	-	-	N
PI 10c - Transport costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	36	33.51%	22.64%	10.94%	-	-	-	-	-	N
PI 18c - Front line labour costs as a percentage of total expenditure (excluding waste disposal costs and CEC)	40	64.03%	44.15%	22.68%	38.02%	-	-	-	-	N
PI 27 - Cost per household excluding trade waste costs	38	£123.86	£70.00	£27.58	£73.67	23	£53.98	3	-	L
PI 37 - Cost of domestic waste disposal per household	20	£77.53	£56.65	£36.85	-	-	£44.16	-	-	L
PI 38 - Cost of municipal waste disposal per household	21	£81.60	£59.96	£30.66	-	-	£50.67	-	-	L
PI 41a - Percentage change in total annual income generated vs. previous year	29	38.39%	9.74%	-9.23%	-	-	-	-	-	N
PI 41b - Percentage change in income generated from recycling vs. previous year	21	188.91%	26.54%	-45.52%	-	-	-	-	-	N
Customer Services performance indicators										
PI 15 - Quality assurance and consultation process	48	56.00%	21.39%	4.00%	35.50%	5	31.00%	1	-	H
PI 16 - Human resources and people management	45	75.00%	44.38%	10.00%	68.00%	3	55.00%	1	-	H
PI 33 - Community / customer surveys undertaken	13	97.00%	83.24%	48.00%	91.00%	6	93.00%	2	-	H
Efficiency performance indicators										
PI 22a - Missed collections per 100,000 collections (full year)	46	315.09	79.33	0.89	2.37	3	39.07	1	-	L
PI 22b - Missed collections per 100,000 collections (April - September)	46	295.95	81.76	0.16	2.37	2	40.30	1	-	L
PI 22c - Missed domestic residual waste collections per 100,000 collections (full year)	44	296.33	91.49	0.45	2.37	2	41.13	1	-	L
PI 22d - Missed domestic residual waste collections per 100,000 collections (April - September)	44	270.35	85.92	0.22	2.37	2	34.36	1	-	L
PI 22e - Missed separate recycling collections per 100,000 collections (full year)	41	189.53	62.15	1.23	2.37	3	32.90	1	-	L
PI 22f - Missed separate recycling collections per 100,000 collections (April - September)	41	296.86	73.66	0.11	2.37	3	40.79	1	-	L
PI 04a - Trade waste contracts (charged) as a percentage of available market	38	100.00%	22.07%	3.28%	10.07%	33	24.67%	4	-	H
PI 04b - Number of trade waste agreements for recycling (free or charged)	49	3,526	580	0	80	40	752	4	-	H
PI 04c - Percentage change in trade waste contracts (charged / non recycling)	34	57.08%	-0.30%	-38.80%	-	-	3.94%	-	-	H
PI 04d - Percentage change in trade waste contracts (all)	34	45.99%	0.81%	-36.10%	-	-	-	-	-	N

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Whole service comparison

Refuse collection performance indicator standings 2021/22

Name of authority	Sevenoaks District Council									
PIN	4335									
Performance indicator	Number in service	Highest in service	Average for service	Lowest in service	Your output/score	Standing in service	Top quartile mark	Quartile achieved	19/20 score	High/Low/Neutral
PI 35a - Litres of fuel used annually in refuse collection vehicles per 1,000 head of population	39	4,811	2,218	1,120	2,146	23	1,658	3	-	L
PI 20a - Staff absence (all employees)	32	17.76%	7.96%	0.00%	-	-	4.80%	-	-	L
PI 20b - Staff absence - days lost per FTE non covid only (Scotland only)(all employees)	8	30.00	20.24	11.59	-	-	11.81	-	-	L
Other recycling performance indicators										
PI 32b - Percentage of household waste sent to landfill per annum (Unitary authorities only)	22	69.59%	15.65%	0.06%	-	-	0.95%	-	-	L
PI 32g - Percentage of household waste collected for landfill per annum (Scotland only)	10	84.64%	58.47%	47.41%	-	-	50.79%	-	-	L
PI 32c - Percentage of municipal waste collected for landfill per annum (Scotland only)	10	84.08%	61.44%	50.51%	-	-	52.76%	-	-	L
Covid impact performance indicators										
PI 39a - Percentage of fleet which constituted additional vehicles for Covid precautions	17	44.94%	22.06%	2.00%	-	-	-	-	-	N
PI 40a - PPE and other covid related equipment as percentage of total expenditure	23	12.31%	3.58%	0.00%	1.01%	-	-	-	-	N
PI 42a - Agency/temporary/casual staff costs as percentage of total staff costs	37	34.34%	10.73%	0.02%	27.46%	-	-	-	-	N
PI 42b - Agency/temporary/casual staff costs as percentage of total expenditure	38	20.47%	5.36%	0.01%	11.78%	-	-	-	-	N
PI 45a - Percentage change in net operational expenditure	34	51.29%	4.06%	-28.36%	-	-	-	-	-	N
PI 46a - Percentage change in number of operational vehicles deployed	38	143.33%	14.69%	-29.69%	-	-	-	-	-	N
PI 46b - Percentage change in cost of operational vehicles deployed	35	72.64%	0.55%	-99.79%	-	-	-	-	-	N

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Notes:

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LOCAL SERVICES
LOCAL SOLUTIONS

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Food Safety Service Plan 2023/24

Cleaner and Greener Advisory Committee – 22 February 2024

Report of: Deputy Chief Executive and Chief Officer for Planning and Regulatory Services

Status: For decision

Also considered by: Cabinet – 14 March 2024
Council – 23 April 2024

Key Decision: No

This report supports the Key Aim of: Meeting a statutory duty of the council.

Portfolio Holder: Cllr. McArthur

Contact Officer: Glenys Shorrick, Ext. 7158

Recommendation to Cleaner and Greener Advisory Committee:

That it be recommended to Cabinet, that it be recommended to Council to note the contents of the 'SDC Food Safety Plan 2023/24' and support the adoption of this document.

Recommendation to Cabinet:

That it be recommended to Council to note the contents of the 'SDC Food Safety Plan 2023/24' and support the adoption of this document.

Recommendation to Council:

To note the contents of the 'SDC Food Safety Plan 2023/24' and agree the adoption of this document.

Reason for recommendation:

This food safety plan details how the Environmental Health Team intend to meet and discharge its statutory obligations in respect of Food Safety. This document is a requirement of the Food Standards Agency and if approved will be shared with them.

Agenda Item 8

Introduction and Background

- 1 The Council recognises the importance that the provision of an effective Food and Safety team plays in ensuring the health, safety and wellbeing of those who live, work and visit our district. This Service Plan sets out how Sevenoaks District Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement on Local Authority Food Law Enforcement. It covers the functions carried out by authorised officers of the Food and Safety Team and provides a clear strategy to ensure that resources are targeted towards front line services and high risk food activities.
- 2 The objective of this plan is to ensure that a program of food enforcement activity is carried out providing public confidence that food is produced and sold under safe and hygienic conditions in the Sevenoaks district. The layout of the plan is dictated by the Framework Agreement between the Food Standards Agency and Local Authorities.
- 3 The Plan sets out our priorities and what they will be going forward ensuring that resources are targeted where they add greatest value in providing safeguards for public health and consumer protection in relation to food.
- 4 We have worked hard as a team to ensure that all of our higher risk establishments (A and B rated) have received an inspection by the due date and all of our non-compliant establishments (awarded a 2 hygiene rating or less) have received a revisit to check compliance.
- 5 We are a busy team and have been carrying a part-time Food Safety Officer vacancy since April 2023. To ensure we meet and exceed our performance target for inspecting medium risk premises due within the inspection programme we have occasionally used an experienced contractor to help us manage variances in demand and fluctuations in the programme.
- 6 The team aims to successfully balance service delivery between education, encouragement and enforcement.
- 7 To ensure that the food safety service operates as efficiently as possible we continue to invest in technology and systems to assist us and we have re-configured processes and procedures. We have developed a more effective strategy which has enabled us to focus more closely on our lower risk food businesses which were not a priority as we were emerging from the pandemic eg home bakers, childminders and pharmacies. Officers continue to undertake electronic food hygiene inspections utilising iPads and custom built iAuditor forms and we have developed additional templates and other food safety documents improving the accuracy and transparency of our service.
- 8 Wherever possible, administration tasks have been moved from qualified Food officers to our technical administrators generating additional capacity. We are working to increase the knowledge and experience of these officers so that

they are able to respond to basic enquiries and requests improving the speed of our responses to customers. We work with our Customer Solutions colleagues to ensure that 'Frequently asked questions' are accurate and informative and with our Communications team to ensure that the content of our website is accurate and a good source of information for residents and businesses. We encourage customers to provide feedback on the service they have received via an emailed customer feedback survey.

- 9 The service remains on track to deliver this year's food programme in accordance with the Food Standards Agency Plans.
- 10 We will carry out a review of our Food Safety service annually and this will be based on performance and resources available over the previous 12 months, feedback from local businesses and the community, observations from Members and the team and guidance issued by the Food Standards Agency.

Key Implications

Financial

Minimal cost as undertaken within existing resources.

Legal Implications and Risk Assessment Statement.

The Food Safety Plan is a document required by the Food Standards Agency and its format is dictated by the Framework Agreement between the FSA and local authorities.

Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Net Zero Implications

The decisions recommended through this paper have a remote or low relevance to the council's ambition to be Net Zero by 2030. There is no perceived impact regarding either an increase or decrease in carbon emissions in the district, or supporting the resilience of the natural environment

Appendices

Appendix 1 – Sevenoaks District Climate Change Strategy 2023/24

Background Papers

None.

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Richard Morris

Deputy Chief Executive and Chief Officer for Planning and Regulatory Services



Service Delivery- Environmental Health Food Safety Service Plan 2023-2024

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Introduction

This Service Plan sets out how Sevenoaks District Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement on Local Authority Food Law Enforcement. The Food Standards Agency regards this as important to ensure national priorities and standards are addressed and delivered locally, The FSA also encourages local authorities to include locally defined objectives in their Plans which we have done.

It covers the functions carried out by authorised officers of the Food and Safety Team under the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013 and relevant regulations made under the European Communities Act 1992. To set it in context with other Environmental Health responsibilities, it should be read in conjunction with current versions of:

- The Council Plan
- The Environmental Health Enforcement Policy
- The Environmental Health Service Plan

1. Service aims and objectives

1.1 Aims and objectives

FSA Recovery Plan arrangements which set out guidance during the period of recovery from the impact of the pandemic came to an end on 31st March 2023.

From 1st April the service has reverted back to the intervention arrangements outlined in the Food Law Code of Practice.

We aim to ensure that all food and drink intended for sale for human consumption that is produced, stored, distributed, handled or consumed in the Sevenoaks District is safe, hygienic and compliant with food hygiene legislation and that all food premises and food handlers comply with the Food Hygiene Regulations. We will encourage good practice

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amongst those responsible for preparing, handling and cooking food and to ensure they comply with their statutory obligations.

This will be achieved through:

- Programmed and intelligence led food hygiene interventions and revisits
- Local delivery of the Food Hygiene Rating Scheme
- Investigation of complaints regarding food sold or prepared in the district
- Investigation of complaints regarding hygiene standards or practices
- Investigation and control of infectious diseases including food poisoning and food borne disease
- Responding to food alerts issued by the Food Standards Agency
- Sampling initiatives in accordance with the Local Government guidance and National programme
- The provision of advice and information on food safety issues
- Promotional work
- Statutory consultation on relevant licensing and planning applications
- Use of questionnaires for lower risk premises
- Developing and utilising partnerships, both professional and commercial, to enhance quality and effectiveness of the service
- Ensuring that food safety guidance is provided to individuals and organisations that are starting new food businesses in the area.
- Monitoring of existing Approved premises as well as granting new approval applications
- Imported food control

1.2 Links to corporate objectives and plans

This Food Service Plan is delivered by the Food and Safety Team (within Environmental Health) whose broad spectrum of work is linked to the Council Plan with particular reference to the health and wellbeing of those who live, work and visit the area. Environmental Health also has a significant role in supporting economic growth.

2. Background

2.1. District Profile

Sevenoaks District Council is located in north-west Kent, is situated to the southeast of London, and administers an area which forms a major part of what is now “commuter belt country”. The population is approximately 121,400 people. The district covers an area of approximately 378km², and comprises a mostly rural land-uses, with the three major centres of population concentration, which occur in and around the towns of Swanley in the North, Sevenoaks and Westerham in the centre, and Edenbridge in the South of the district.

Our Food Safety service is delivered from:

Sevenoaks District Council

Council Offices

Argyle Road

Sevenoaks

Kent

TN13 1HG

Telephone number 01732 227000. Our offices are open between 09:00 and 17:00 Monday to Friday. environmental.health@sevenoaks.gov.uk

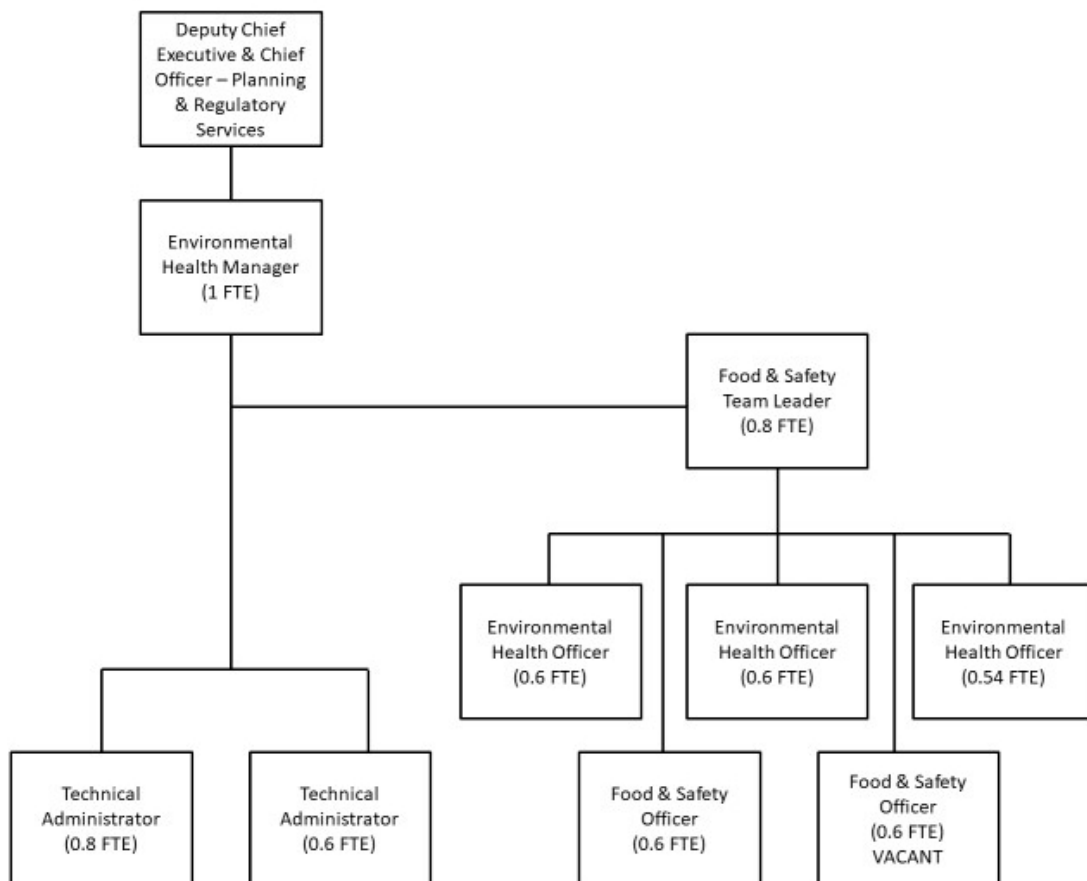
Outside of office hours, an emergency out of office service is provided via CCTV who will operate a cascade system to contact a suitably qualified and experienced Environmental Health Officer.

2.2. Organisational Structure

The Food Service Plan is delivered by officers in the Food and Safety team which reports to the Environmental Health Manager (EHM). The EHM reports to the Deputy Chief Executive & Chief Officer Planning and Regulatory Services. A structure chart for the service is provided below.

The team is also tasked with delivery of the Council's statutory health & safety enforcement function and appropriately qualified, experienced and authorised staff carry out these day to day health & safety functions alongside their food hygiene responsibilities.

2.2.1. Organisational diagram showing the Food and Safety Team



2.3. Scope of the Food Service

The Food and Safety team is responsible for:

- Implementing programmed and intelligence led food hygiene interventions and revisits for non-compliant premises
- Investigating reported cases of food poisonings and potential outbreaks in accordance with the UK Health Security Agency (UKHSA) guidance
- Investigating requests for service regarding the hygiene of food premises, or food safety issues relating to foods purchased or produced in Sevenoaks
- Developing and delivering a programme of appropriate interventions for lower risk premises
- Registration of food premises
- Monitoring of existing approved premises as well as granting new approval applications
- Responding to food alerts issued by the Food Standards Agency
- Delivering a food sampling programme in line with local and national programmes
- Provision of advice and support to existing and prospective food business operators and users of the service
- Consideration of planning and licensing applications relating to food premises.
- Implementing projects and campaigns that promote good food hygiene
- Development and maintenance of partnerships and liaisons to the benefit of the Food Service
- Delivering the National Food Hygiene Rating Scheme
- Ensuring that food business operators providing non-prepacked food and food that is 'pre-packed for direct sale' (PPDS) are given appropriate advice on allergens.
- Issuing export certificates to local businesses that export food products
- Imported food control

(Note: All food standards and feeding stuffs enforcement is undertaken by Kent County Council Trading Standards Department and so no reference to these will be made in this document. There is a Memorandum of Understanding between Kent County Council

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Trading Standards and the twelve local authorities which provides Environmental Health with some legal powers under the Food Information Regulations 2014).

All food services are delivered by in house staff, except where analytical services are used. Contractors may occasionally be used to carry out inspections of medium risk premises to support our work and help us manage variances in demand and fluctuations in the inspection programme but this will depend on money available in the service budget. Work carried out by a contractor will be closely monitored by the Food and Safety Team Leader.

2.4. Demands on the Food Service

2.4.1. Food Hygiene Interventions

There are approximately 1,071 registered food premises and ten approved premises as of 30th September 2023. Approved premises fall outside of the scope of registration and therefore are not recorded in the table below.

Premises type	Number
Primary Producer	11
Manufacturers & Packers	11
Importer/Exporter	11
Distributor/Transporter	4
Retailer	176
Caterer	858
Total	1,071

Of these premises, approx. 500 are due for inspection each year. We receive approx. 10 new food registrations per month which need to be prioritised for inspection and then included in the inspection programme. Prior to the pandemic we received on average 6/7 new food business registrations. The increase is mainly the result of more home

caterers and mobile caterers registering. This reflects the fact that the general public are diversifying into different means of employment to support their income.

Between 1st April and 30th September 2023 we closed the records of 90 food businesses which had ceased trading, although some may have registered and never traded.

Businesses that have closed rarely advise us and it can be a time consuming exercise chasing food business operators for information about the status of their business.

Since 1st April to end December 2023 we have received 6 requests for a food hygiene re-rating inspections. Food businesses are able to request a re-rating after they have made improvements. We charge £205 for this service, as it requires a full additional inspection to be carried out. This is half the number of requests received the previous year.

However, we are currently finding poorer standards in many businesses inspected and consequently we are having to carry out more revisits to non- broadly compliant businesses to check that they have made the improvements required. Lack of staff and increased costs are likely to be contributory factors.

The full range of food safety interventions also includes advisory visits and food sampling visits.

Local businesses are also expanding their markets and are increasingly exporting products. As the United Kingdom is no longer in the European Union all countries are now classed as being 'third countries' and these food products require to be accompanied by an export certificate from the inspecting officer certifying that the produce has been made in accordance with the requirements of current Food Legislation. This creates additional work as consignments being exported to third countries require additional checks at point of production so that the certificates can be issued.

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2.4.2. Approved Premises

We have 11 Approved premises which are inspected in accordance with our risk rating programme. Approval may be required where products of animal origin are produced/processed. The standards required and levels of product monitoring at an Approved Premises are far more stringent than for 'Registered Establishments'. As a result the inspection and monitoring programs as well as the frequency of product sampling is far more onerous than for routine food hygiene inspections.

We currently have:

- 3x milk pasteurising,
- 2x cheese makers,
- 1x kefir (dairy),
- 1x meat processing
- 4x egg packers

We also have 2 farms selling raw milk which are inspected by the Dairy Hygiene Inspector from the Food Standards Agency, however the bottling process comes under our remit.

A number of private estates have developed their commercial operations as a means of bringing in more income. This includes wedding and conference venues, music festivals and weekend events involving mass catering. The expanded use of rural land has seen a huge increase in the number of Event Notifications being received by Environmental Health. The Food and Safety team reviews and comments on event plans including the catering provision and an officer attends the Council's Safety Advisory Group (SAG) meetings.

2.5. Enforcement Policy

The Environmental Health service adopts the principles laid down in the Regulators Code (which states that enforcement must be fair, consistent and equitable) and the Enforcement Concordat for all appropriate services. The Environmental Health Enforcement Policy has been approved by Council.

The Council also has a formal complaints procedure available to any customer aggrieved by our processes or decisions, except where an appeal mechanism is available eg the Food Hygiene Rating Scheme safeguarding procedure.

3. Service Delivery

3.1. Food Premises Interventions

100% of our higher risk establishments (A and B rated) have received a programmed inspection within the month of their due date to ensure that the PI set for the department is met. Any establishment awarded a 2 hygiene rating or less is non-compliant with required food safety standards and is re-visited within an appropriate time frame. We currently have approx. 18 businesses with a 2 hygiene rating.

All new businesses are triaged and prioritised for inspection. They are then inspected and provided with a food hygiene rating as soon as possible. Inspection of unrated premises as well as inspection of high-risk establishments is a priority.

Where an unregistered food business is found trading in the area, then an inspection will be undertaken as soon as it is practical to do so and the business will be required to complete a registration form at the time of the inspection.

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Lower risk premises (categories D and E) may be monitored by means of alternative interventions (normally via a questionnaire) following an initial inspection eg home bakers and pharmacies.

Category D premises that only handle low risk foods and pre-packed goods can be assessed by questionnaire however, a business that sits in this category but handles “high risk” foods must have a full inspection at every programmed intervention.

The information available to businesses on the Council’s website has been reviewed and re-written over the last few years. We have invested time in making these changes for several reasons:

- to give new and existing businesses on-line access to all of the information that they need to ensure that they are compliant with current legislation
- to reduce the amount of time that officers spend talking to new food business operators and repeatedly providing verbal answers to the same, or similar questions
- to reduce the amount of time taken to undertake “first inspections” as the operator has had access to all of the information they need in order to be at least ‘Broadly compliant’ (equivalent to a 3 hygiene rating).

3.2. Inspection Frequencies

The table below summarises the frequency of inspections for different risk categories where A is the highest risk. The category is defined by scoring premises around potential hazard associated with the business and food safety compliance, this then relates to the interval between inspections

As a rough guide, on average, around 50% of all registered food business will need to be inspected each year. This equates to around 500 inspections/interventions per year. The figure does not include inspection of new business or the inspection of Approved premises.

Category	Inspection Rating	Minimum inspection frequency
A (High Risk)	92 or higher	At least every 6 months
B	72 to 91	At least every 12 months
C	52 to 71	At least every 18 months
D	31 to 51	At least every 2 years. An alternative enforcement strategy (AES) can be used when and where it is deemed to be appropriate for every alternate inspection.
E (Lowest Risk)	0 to 30	At least every 3 years. An AES can be used when and where it is deemed to be appropriate due to the low risk nature of the business. For business not considered as a food business by the public AES can be used for every scheduled inspection.

Between 1st April 2023 and 31st March 2024 the following inspections/interventions are due:

- A rated-2
- B rated-42
- C rated-152
- D rated-181
- E rated-75
- New businesses receiving an inspection approx. 10/month

3.2.1. Performance Indicators

The following performance indicators apply to the food service:

- 100% completion of higher priority graded inspections (Category A and B)

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- 75% completion of lower priority graded inspections (Category C, D and E)

The team has met the target for higher risk inspections each month.

Progress against the planned inspection programme is monitored by the Food and Safety Team Leader and statutory activity returns and quarterly 'temperature check' surveys are provided to the Food Standards Agency.

As the team has been carrying a part time Food Safety Officer vacancy since 1st April 2023 a contractor is employed when necessary to carry out inspections. This is to ensure that we are able to inspect the majority of our due C and D category inspections (exceeding the 75% PI), avoiding inspections being carried forward into next year's inspection programme.

3.3. Food and Food Premises Complaints

Food complaints received and investigated by the service fall into one of two broad categories -food contamination or complaints about food businesses (hygiene and practices).

Investigations are carried out in accordance with guidelines issued by the FSA. In 2023 we received 46 complaints regarding the hygiene of premises. We receive very few complaints about food contamination.

All service requests are managed in accordance with the Local Performance Indicator. Where the complaint relates to premises which are outside of the district we will work with the relevant authority to investigate the complaint. Where appropriate we will pass the matter to another authority and inform the customer why the complaint has been referred on, along with contact information for the other local authority.

Requests for service regarding food standards will be dealt with in accordance with the agreement between Kent County Council Trading Standards and the local authority. Where appropriate, complainants will be re-directed to the County Council. Trading Standards will not accept complaints made by Environmental Health on behalf of a member of the public who has initially contacted the wrong authority.

The majority of service requests received are 'For Information and Advice'. They account for around half of all service requests received.

All service requests are allocated as soon as possible after receipt and prioritised for appropriate action.

The Environmental Health have a performance indicator for service requests as follows:

- Average time taken (days) to provide a meaningful response to service requests. Target is less than 5 days (average).

3.4. Primary Authority Principle

We acknowledge the Primary Authority Principle and will act in accordance with LGR guidance.

The Regulatory Enforcement and Sanctions Act 2008, regulated by Regulatory Delivery (RD), introduced measures to secure coordination and consistency of regulatory enforcement by local authorities by establishing a Primary Authority scheme.

Businesses operating in more than one local authority area that choose to have a Primary Authority Partnership will benefit from improved consistency of advice and enforcement across local authority trading standards, environmental health, licensing and fire and rescue services. We will comply with the legislation and guidance issued by RD. We will take direction from inspection plans produced by Primary Authorities for multi-outlet businesses and we will notify relevant PAs where formal enforcement action is proposed.

3.5. Advice to Businesses

We are proactive in providing advice to businesses to help them comply with the law and we encourage the use of best practice. This approach aims to help standards of food hygiene to improve and for positive relationships to be built with food business operators. We achieve this through:

- advice given during inspections and other visits
- the provision of advisory leaflets
- responding to enquiries
- advice regarding the implementation of the Safer Food Better Business(SFBB) pack
- availability of food safety information on the Council's website
- advising proposed businesses at the planning stage

Advice and support for businesses is also provided via our link with “Team Around Your Business” which is a single point of contact for businesses.

A new ‘Gain or Retain a 5 scheme’ has been agreed with the intention to implement the scheme from April 2024. This would be a new chargeable scheme for the delivery of comprehensive advice to food business operators (fbo). The proposal is to offer a set amount of advice and information within one chargeable fee that provides a fbo with the best chance of obtaining a 5 rating at the time of inspection. It is anticipated that the scheme will generate a small income for Environmental Health. Some elements of the scheme still need to be resolved before implementation eg the content of the service-level agreement.

3.6. Food Inspection and Sampling

The microbiological and physical examination and analysis of food is undertaken on the basis of:

- businesses identified for sampling as part of a nationwide, regional or local schemes
- businesses subject to consumer complaints or outbreak investigations
- during a programmed inspection where the officer deems a sample is necessary.

We support all relevant nationally co-ordinated food sampling programmes organised by the FSA and the UK Health Security Agency UKHSA (formally known as PHE) Laboratory Services as well as any relevant cross regional surveys co-ordinated by the Food and Water Laboratory. Samples requiring microbiological examination are collected by a courier service and taken to the Colindale laboratory in London.

Since 1st April to end November 2023, 53 samples were taken for microbiological analysis. We have supported a local/cross regional studies on Ready to eat salads from catering and retail premises, Cooked meats and Swabbing in catering premises.

There is a separate food sampling plan for businesses within the district that are Approved Premises. The Food Standards Agency requires that microbiological testing of locally produced food from 'Approved' premises is undertaken annually.

3.7. Control and Investigation of Outbreaks and Food Related Infectious Diseases (Food Poisoning)

Investigation of outbreaks will be in accordance with the UK Health Security Agency (UKHSA) Communicable Disease Outbreak Management Plan. The number of notifications received almost always relates to single cases rather than outbreaks. Single cases are investigated in accordance with the Single Case Plan made under a Framework Agreement for the control of communicable disease between UKHSA and Kent and Medway Environmental Health teams.

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All infectious disease notifications are followed up by a standard letter, advisory leaflet and questionnaire (where appropriate) to identify possible sources of infection and recommend practices to prevent its spread.

3.8. Food Safety Incidents

The Council complies with the Food Safety Act Code of Practice in relation to handling food alerts. Food alerts are issued by the FSA to communicate information on national food issues, the majority being for information only. Food alerts for action require officers to undertake a wide variety of courses of action dependant on the issue.

3.9. Liaison with Other Organisations

The Food and Safety Team is committed to sharing data where permissible, learning from the experience of others and endeavouring to secure consistency. This is aided considerably by participating in countywide or national professional networks.

- Kent Food Technical Group
- Kent Food Sampling Sub Group
- Liaison meetings with the CCDC/ UKHSA
- Kent Infection Control Committee (KICC)
- Kent Environmental Health Managers Group

The importance of partnerships and joint working extends also to contacts within the Council, which includes Building Control, Development Control, Licensing, Legal Services, Economic Development, Community Safety Unit, CCTV and the Environmental Protection Team within Environment Health. The team also works in partnership with a number of external organisations including; Food Standards Agency, UKHSA, DEFRA, Kent Police and Kent Fire and Rescue, HSE, Border Force and DWP

3.10. Food Safety Promotion

We participate in the Food Standards Agency National Food Hygiene Ratings Scheme. The scheme is designed to provide information about business hygiene standards to members of the public but it is also a useful tool to drive up performance standards of food businesses.

We are promoting businesses that have achieved a 5 hygiene rating at a recent inspection via social media-‘Five Star Friday’.

We will look to develop our food safety education role and seek to identify new opportunities to deliver information on food safety and food allergen awareness.

Natasha’s Law came into effect on 1st October 2021. This requires food businesses to include full ingredients labelling (with the 14 major allergens emphasised in the list) on pre-packed for direct sale foods on the same premises from which they are sold. For example, a packaged sandwich or salad made by staff earlier in the day and placed on a shelf for purchase.

Kent Trading Standards are authorised to undertake enforcement of these legal requirements so we will proactively report matters to them and support their investigations in order to drive up compliance.

Allergen awareness interventions are included within our routine food safety inspections.

Wherever practicable we will participate in national campaigns to improve food safety standards and awareness of good practice. Where we decide to take part in campaigns we will ensure that they are focused to make best value usage of our resources.

4. Resources

4.1. Financial Allocation

The Environmental Health Function operates within an annual budget of approximately £780,000 per annum. Of this total, approximately £347,000 is allocated to the Food & Safety Team. Food safety accounts for approximately 77% of the work undertaken by the Food & Safety Team (£267,000).

The majority of the budget is allocated to staffing costs (salary plus on costs including training, professional membership etc.). The remainder is used to fund equipment, sampling and other necessary support services.

The Food & Safety Team budget covers all of the functions of the team and resources are allocated according to the needs of the service. The Food and Safety Team Leader is responsible for the day to day management of the budget. Financial allocations are currently considered sufficient to meet the equipment and training needs of the team.

If and when necessary, the Environmental Health Manager has the flexibility to supplement the Food & Safety resources from elsewhere within the Environmental Health Team budget.

4.2. Staffing Allocation

The Environmental Health Team currently allocate 3.21 FTE to discharging the food safety functions. This FTE is allocated by role as follows:

Role	FTE
Environmental Health Manager	0.20
Food & Safety Team Leader	0.41
Environmental Health Officer- 1	0.42

Role	FTE
Environmental Health Officer- 2	0.43
Environmental Health Officer- 3	0.51
Food & Safety Officer- 1	0.43 Vacant
Food & Safety Officer -2	0.51
Technical Administrator-1	0.20
Technical Administrator-2	0.10
TOTAL	3.21

If necessary (i.e. in the event of an outbreak or major incident) additional resources are available from within the Environmental Protection Team (5.6 FTE) and/ or neighbouring authorities within Kent as part of an informal support network.

An external contractor has been employed to carry out a certain number of food safety inspections while we have a vacant post.

4.2.1. Allocation of staff resources by task

By Task	FTE
Food hygiene inspection	1.86
Food complaints	0.05
Primary & Home authority principle	0.025
Advice to business	0.4
Food Sampling	0.2
FP and ID investigations	0.05
Food Safety incidents	0.05
Liaison with other authorities	0.05
Food Safety Promotion	0.025
Training and Education delivery	0.05
Administration	0.2
Monitoring and review of service	0.1
National Food Hygiene Rating Scheme	0.1
CPD and team consistency training	0.05
Total	3.21

4.2.2. Use of Specialist Contractors

We do not routinely use contractors and do not have an allocated budget for their employment.

However, if and when necessary we may employ suitably qualified and experienced specialist contractors on an ad hoc basis to assist with the delivery of food safety inspections. Contractors are required to demonstrate compliance with the competency framework in advance of their employment.

4.2.3. Operational Efficiency and Accuracy

We recognise the importance of ensuring that our service offers best value to the residents of Sevenoaks and work hard to ensure that the food safety service operates as efficiently as possible.

We have invested in technology and systems to assist us with the delivery of food safety, re-configured processes and procedures to ensure that they utilise the available resources effectively and minimised waste.

4.2.4. Electronic Inspections

Our officers continue to undertake electronic food hygiene inspections, utilising iPads and custom built iAuditor (specialist auditing software) forms.

These electronic inspections ensure that officer notes, comments, recommendations and legal requirements are communicated clearly to Food Business Operators in Portable Document Format (PDF). Photographs and other evidence can be attached to the inspection ensuring that officer reasoning is made more transparent and easily explainable to those not present at time of inspection. As a result, we are receiving fewer appeals against Food Hygiene Ratings.

We have, and continue to develop inspection templates (eg specific templates for assessing home bakers, childminders and pharmacies) and other food safety documents

improving the accuracy, transparency and efficiency of our service. These include standard letters, Voluntary closure documents, Voluntary surrender of food and Certificate of examination of unsaleable food.

4.2.5. Enterprise for Uniform

Introducing Enterprise for Uniform helps us keep track of, prioritise, record and monitor food hygiene inspections. This system has enabled us to undertake a full review of our existing food premises and make sure that databases we hold are accurately updated and cleansed of duplicate entries, unnecessary records and historic input errors.

4.2.6. Process Re-design

We have ensured that whenever possible, administration tasks have been moved from qualified food hygiene inspectors to our technical administrators generating additional capacity. We are working to increase the knowledge and experience of these officers so that, with the support of qualified food safety officers, they are able to respond to basic enquires and requests improving the speed of our responses to customers.

We have worked with our colleagues in Customer Solutions to ensure that the 'Frequently Asked Questions' (FAQ) (accessed during a customer's initial contact with the Council) are accurate and informative. This has helped to ensure that customers are where necessary signposted to other organisations (such as UKHSA or Kent County Council Trading Standards) and resolve some common enquiries at point of 1st contact without the need for officer involvement.

4.2.7. Website Updates

We continue to utilise our website as a source of information for residents and businesses. We work with our Communications Team to ensure that the content we produce is accurate and user friendly and that it assists our customers and their needs.

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We have developed with IT colleagues a more efficient process for Food Hygiene Rating rescore inspection applications. We now have an on-line revisit form which ensures that the food business operator has to provide information at the time of payment regarding improvements that have been made since the programmed inspection rather than this being a separate process.

We do not recreate resources available elsewhere and link to authoritative sources whenever possible such as the FSA website.

4.3. Staff Development

The Council places significant importance on the development and training of staff to ensure that quality services are delivered to our customers.

The Food Standards Agency requires that all persons undertaking any food hygiene and/or food standards functions must undertake a minimum of 10 hours work specific CPD each year. The CIEH requires a minimum of 20 hours work specific CPD each year.

All Officers are required to prove competence via the Competency Framework introduced by the Food Standards Agency. Training will be undertaken through in-house training, formal courses and vocational visits as appropriate. The team undertakes regular training as part of team meetings to ensure that knowledge and interpretation of legislation and guidance is maintained. The team also completes consistency exercises to ensure that food hygiene ratings awarded to businesses are consistent across the team.

Training needs are considered as part of the appraisal process and staff maintain a training and development file containing evidence of formal qualifications and CPD certificates from external and internal course attended, together with details of agreed, planned training for the forthcoming year.

Officers may have access to an online training platform which provides training modules and webinars. The service provider was for a number of years the sole contracted

provider of FSA training to local authorities as well as acting in a consultancy capacity to the FSA on the development of Guidance.

5. Quality Assessment

The work of the Food & Safety Team is subject to scrutiny by Members, internal auditors and the Food Standards Agency

All officers delivering food law interventions are required to meet a rigid qualification criterion and demonstrate knowledge and competency across a number of skill sets. The competency framework drives personal and team training and development. It is also used to highlight gaps in the team's knowledge and skills.

All officers participate in annual national consistency exercises developed by the Food Standards Agency to review various scenarios and then to determine the hygiene rating awarded. The team also participates in Kent wide and in-house scenario set exercises.

The following monitoring arrangements are in place to assist in quality assessment:

- inspection audits including associated paperwork
- performance and development reviews
- customer satisfaction questionnaires
- performance monitoring of target response time
- 1:1 meetings with team members
- Team and department meetings
- use of Enterprise in the IDOX Uniform database to improve monitoring of the inspection programme and service requests

In our work programme, we will continue to review and improve our documented food procedures required within the Food Standards Agency's Framework Agreement.

6. Review against the Service Plan

We will carry out a review of our Food Safety service each year. This will be based on performance and resources available over the previous 12 months, feedback from local businesses and the community, observations from Members and the Food and Safety team and advice and guidance issued by the Food Standards Agency.

The FSA are in the process of developing a new performance monitoring system and have removed the use of the Local Authority Enforcement Monitoring System (LAEMS). It is likely that new benchmarking categories will be set and we may need to adapt our key performance indicators to reflect these changes once the detail is known.

7. Areas of Improvement

Every effort is being made to maintain a high quality service to the public and to meet and exceed performance targets. We aim to:

- improve the accuracy of the Uniform database
- reduce the number of non-compliant premises
- respond to requests for advice within max 5 working days
- triage all new food business registrations received so that they can be prioritised for inspection as soon as practicable
- be more alert to issues around mislabelling (Trading Standards)
- and food fraud
- continue to raise awareness and provide advice in relation to food allergies and intolerances within the catering industry
- to give renewed emphasis in promoting the healthy eating message
- encourage customers to provide feedback on the service they have received via an emailed customer feedback survey.

8. Contact Officer

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6 June 2024

17 September 2024

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