

DOMESTIC WASTE & RECYCLING - DESKTOP REVIEW INCLUDING THE BIG WASTE CONVERSATION FEEDBACK

Cleaner & Greener Advisory Committee – 12 March 2025

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

Status: For Decision

Also considered by: Cabinet – 20 March 2025

Key Decision: Yes

Executive Summary: This report outlines recommendations following the first phase of the desktop review, as well as feeding back on the survey results from the BIG Waste Conversation.

Portfolio Holder: Councillor Irene Roy.

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Recommendation to Cleaner & Greener Advisory Committee:

- a) Members note the findings of the waste and recycling desktop review,
- b) Members note the views of residents collected through the Big Waste Conversation
- c) Members note the requirement and proposal to introduce food and glass waste collections services no later than 1 April 2026
- d) Members set out their views on the chronology for the preferred option for the future of Sevenoaks District Councils waste and recycling services for consideration by Cabinet
- e) Consider setting up a Task & Finish Group to look at our neighbouring districts waste services in preparedness for local government reorganisation.

Recommendation to Cabinet:

- a) Members note the findings of the waste and recycling desktop review,
- b) Members note the views of residents collected through the Big Waste Conversation
- c) Members note the requirement and proposal to introduce food and glass waste collections services no later than 1 April 2026
- d) Noting the views of Cleaner & Greener Advisory Committee, Members approve the preferred option for the future of Sevenoaks District Councils waste and recycling services.

Reason for recommendation: The domestic waste and recycling collection services are a priority for the Council. It is therefore vital that the services operate in an efficient, safe, and effective manner while remaining sustainable and affordable for the Council. Current demands on the service, working practices and future legislative challenges require the council to urgently consider changes to service delivery options to avoid serious service failures.

A members' led task and finish group could be established to look at waste services for our neighbouring districts in preparedness for local government reorganisation and should report back to the Cleaner & Greener Committee at its next meeting.

Introduction

- 1 On the 19 November 2024, Council adopted and approved a new Waste and Recycling Strategy. It was further resolved that:
 - Public consultation on the delivery of the Waste and Recycling Strategy, delegating responsibility to the Portfolio Holder for Cleaner & Greener to agree the survey approach and questions is approved; and
 - A further report to the Cleaner & Greener Advisory Committee will be presented in March 2025 setting out options on the journey to delivering the Waste and Recycling Strategy, following public consultation.
- 2 Additionally, at its meeting on 18 July 2024, Cabinet resolved to undertake an internal desktop review, exploring service opportunities, costs and increasing recycling rates for new waste collection options that include food and glass collection, this report is the first phase of that desktop review. A second phase desktop review report will be presented to the next meeting of the Cleaner & Greener Committee in the summer 2025.
- 3 The methodology used to complete the desktop review was to complete a detailed data gathering exercise to replicate current operations and costs for the service (the 'Baseline' scenario). Several alternative collection profile options were considered. All operational modelling was completed using The Waste and Resources Action Programme (WRAP) Kerbside Assessment Tool (KAT), which allows current collections to be modelled and potential kerbside collection profile options to be forecast and evaluated. This is the same methodology used by the two independent reports carried out by The Association of Public Sector Excellence (APSE) and WRAP.

- 4 The outcomes of the desktop review, as set out in this report, reach the same conclusions as two independent reports that have previously been commissioned by the Council, in that, we need to change the waste collection service to increase recycling rates and to sustain operational delivery within the resources currently available.
- 5 Since the Council adopted the Waste and Recycling Strategy, it is now likely that Sevenoaks District Council will be subject to local government reorganisation and will be merged with other neighbouring councils to form a new unitary authority. The other major announcement from Government is on Simpler Recycling and the need for all waste authorities to ensure compliance with the new rules, and whether alternative collection methods need to be considered.
- 6 Local government reorganisation is likely to have significant implications for waste collection services. In practice, it may be prudent for Sevenoaks District Council to start to think about taking steps to align its waste collection services with those authorities that are most likely to form the new unitary council.

The BIG waste Conversation – Resident survey feedback

- 7 The BIG Waste Conversation consultation consisted of both an online survey, open to all residents, and a smaller representative face-to-face survey. The questions asked of residents were identical in both surveys, which were run by an independent, external market research company. The survey results provide an insight into the waste management and recycling habits of Sevenoaks District residents and also provides information on attitudes towards recycling and views on potential changes to collection services.
- 8 A total of 3,853 respondents completed the online survey between 9 December 2024 and 3 February 2025. This was a self-selecting survey and anyone could take part. While the profile of respondents to this survey was close to that of the District population as a whole, demographic information was optional. From the information provided, it is apparent that some age groups and groups of people were under represented.
- 9 The face-to-face survey of residents took place between 2 January and 5 February 2025. The sample was 427 residents and was broadly representative of the District population as a whole in respect of gender, age, working status and geographic spread across the District.
- 10 In broad terms, the responses from the two surveys were similar with one or two notable exceptions, including the question 'support for collecting waste one week and recycling the next'.
- 11 The following paragraphs set out a short summary of the main questions included in the survey. A full summary report is provided as Appendix 1 to this report.

12 **General Waste Management** - The survey asked respondents about the number of general waste (black) sacks they fill in a typical week. The responses varied across different age groups and genders with most households (online survey 89% and representative survey 91%) filling between 1 to 3 sacks per week.

13 **Recycling Habits - Newspapers, Magazines, and Paper:** The majority of respondents put these items in a recycling bag or clear sack, with a small percentage taking them to a recycling centre.

14 **Recycling Habits – Cans, Tins, and Metal Items:** These are predominantly recycled in bags or sacks alongside aluminium meal trays and kitchen foil.

15 **Recycling Habits – Plastic bottles & Long-life Cartons:** Tetra Paks® are less commonly recycled, with some respondents unsure about how to recycle them. However, plastic bottles and tops are widely recycled in bags or sacks. Plastic pots, tubs, and trays are recycled, but less consistently than bottles.

16 **Recycling Habits – Glass Bottles and Jars:** These are often taken to recycling centres, though a small percentage incorrectly recycle them in bags or sacks.

17 **Barriers to Recycling:** Most respondents indicated they recycle everything they can. Those that did not cited barriers such as lack of knowledge about recyclable items, inconvenience, a lack of space, and time constraints.

18 **Importance of Recycling Services:**

- 86% of online respondents and 89% of representative survey respondents highlighted the importance of Sevenoaks District Council improving the environmental impact of waste and recycling services.
- 77% of online survey respondents and 86% of representative survey respondents said the Council should reach the new national recycling target.
- 87% of online survey respondents and 88% of representative survey respondents supported the provision of services that help reduce general waste.

19 **Proposed Future Services**

- Glass – 88% of respondents of both surveys said they would use a kerbside glass recycling service.
- Food waste – 55% of online survey respondents and 66% of representative survey respondents said they would use a kerbside Food Waste Collection service. Some respondents expressed concerns about storing food waste.

20 **Additional Materials** - Respondents expressed interest in the Council collecting additional materials such as clothing, textiles, and small electrical items.

- 21 **Collection Frequency:** Opinions were divided on the approach of collecting waste one week and recycling the next. 26% of online survey respondents and 44% of the representative respondents supported this as an option.
- 22 **Wheelie Bins:** A majority of respondents supported the option of providing households with wheelie bins for general waste (online survey 67%; representative survey 69%).
- 23 This summary captures the key findings and themes of the Sevenoaks Waste Survey, providing a detailed overview of residents' waste management practices, recycling habits, and preferences for future services.
- 24 It should be noted that the survey results for the amount of residual waste presented and how much residents recycle does not align with the data recorded for the district.
- 25 The amount of black sack, residual waste, recorded in 2023/24, was 26,500 tonnes or over 580kg per household, which is extremely high in comparison to other organisations. The national average is around 470kg per household, with Sevenoaks District residents producing 23% more residual waste than the national average.
- 26 The districts recycling levels currently average around 37%. This is made up of 20% garden waste and only 17% from recycled materials collected in sacks. The national average for recycling is approximately 44%.

Waste & Recycling Strategy Desktop Review

- 27 This first phase of the desktop review has been completed and sets out the operational improvements necessary to start to deliver the domestic Waste and Recycling Strategy.
- 28 The main aims of the Waste and Recycling Strategy, based on the principles of the national waste hierarchy and the strategies aims and objectives, are:
 - a) To provide the Sevenoaks District with a cost and carbon efficient recycling and waste service that maximises the recovery and recycling of valuable natural resources and meets the needs and expectations of our residents.
 - b) To ensure that this service is compliant with national legislation, adheres to health and safety obligations and compatible with any new working arrangements with our Kent County Council (KCC) waste disposal partners and any future unitary council arrangements.
- 29 The desktop review sets out vital operational changes that are fully costed that will need to be made to deliver the Strategy's aims and objectives and to keep the service operating efficiently. The Strategy has four main objectives:

- **Objective one** - Minimise carbon impact of waste/recycling service. We are committed to taking all possible measures to help tackle climate change. We will do this by considering the carbon impact of each element of our waste collection service.
- **Objective two** - Increase quality and quantity of recycling. Our recycling rate is currently very low when compared to other authorities, ranking us 246th out of 343 waste collection authorities in England. Future recycling rate targets set by the Government will not be met without service changes. Contamination (non-recyclable items) within the recycling is also increasing, and we need to be able to provide feedback directly to residents to educate and help bring about behavioural change.
- **Objective three** - Reduce levels of overall household waste. Waste reduction remains top of the waste hierarchy; therefore, we must implement all possible actions proven to reduce levels of waste. Over time, replacing unsafe for manual handling black waste sacks with 180-litre black wheelie bins.
- **Objective four** - Legislative and regulatory compliance. As a waste collection authority, we are required to comply with any legislation that Government pass in relation to waste collection services. Failing to meet requirements on current and any new legislation or meet health and safety standards for staff may result in severe penalties for us.

The Need for Change

- 30 Given the continuing year-on-year rise in domestic residual black waste, the current waste collection service is beginning to fail to collect all the waste being put out by households on the scheduled day, and to separate it at the kerbside.
- 31 The mixing of waste in an emergency, where it could be separated in small quantities is no longer an option due to the volume of residual waste. The mixing of waste is now becoming a regular occurrence, which means some of the recycling waste collected goes with the residual black waste to provide green energy and is not recycled.
- 32 Regardless of the demands of Government, we have a waste collection problem that, if continued, will quickly make the current system of collection unsustainable. The challenges faced by collections teams on a daily basis indicate that without urgent change, the service is at risk of failing our residents.
- 33 The increasing weight of waste presented at the kerbside, means that the Council does not have enough resources in split-back waste vehicles to collect waste separately and therefore we need to consider the options for changes to our collection methods.

- 34 It is also the case that we are on the outer limits of the Operator's Licence for our fleet. Adding more vehicles to the fleet is therefore not an option based on the size of the current depot and the budget allocated for delivering the service.
- 35 The 'O' licence is issued by the Traffic Commissioner and restricts the number of HGV vehicles that we can have on our site at Dunbrik, so simply increasing the number of vehicles we have is not a solution. Increasing the number of vehicles would also mean that we would need to employ a greater number of HGV drivers and loaders. Unfortunately, much higher staffing numbers could not be accommodated at our Dunbrik depot and would require significant growth in revenue budgets. This could also not be achieved within the required timeframe.
- 36 The increasing waste weight problem will lead to more waste being mixed in inappropriate vehicles because it can no longer be separated and ultimately waste not being collected at all on scheduled collection days due to lack of capacity. This was witnessed over the festive and New Year period, even though we had five extra waste vehicles helping collect the general waste, which are normally used for garden waste. This is also starting to impact our ability to go back and collect missed waste, which could result in residents having to take back in missed waste until the next collection.
- 37 As we have introduced the new reusable recycling bags, we are collecting more recycling, which is a positive move towards delivering the new Waste and Recycling Strategy. However this is starting to overwhelm the 30% capacity of the split-back vehicles we operate, i.e. we are running out of space on the vehicle at the kerbside. This could result in the waste being mixed or worse, not being collected at all on the scheduled day.
- 38 In July 2024, the new Government asked for views on its updated National Planning Policy Framework (NPPF). It includes a revised housing target for the Sevenoaks District that jumped from 704 to 1,113 new homes to be built every year between 2025 and 2040. This will place additional burdens for collecting waste from the kerbside, making the current model even more unsustainable.
- 39 The Council's Housing Strategy 2022-2027 shows that there were 121,415 people living in Sevenoaks District in 2020. The population is projected to increase to 129,442 by 2040, an overall increase of 8,027 or 6.6%. The type of homes built will also influence how we collect waste going forward with more conversions and adaptations will result in more communal facilities required. For example, given the new Government targets for homes to be built each year will mean an additional vehicle/round and three staff will be required to collect the domestic waste, adding to the current waste collection pressures and facilities at Dunbrik going forward.
- 40 Since the Council adopted the Waste and Recycling Strategy, the Government published the 'English Devolution White Paper' on 16 December 2024. This has

significant implications for Sevenoaks District Council's waste collection service. By 31 March 2028, it is likely that Sevenoaks District Council will be merged with nearby councils to form a new unitary authority. In practice, Sevenoaks District Council may wish to start to consider taking steps to align its waste collection services to those authorities that already provide alternate weekly collections.

41 Current neighbouring authority waste service collections, as follows:

Neighbouring Authority	Current waste collection frequency and method
Tunbridge & Malling Borough Council	Bi-weekly, wheelie bins
Tunbridge Wells Borough Council	Bi-weekly, wheelie bins
Maidstone Borough Council.	Bi-weekly, wheelie bins

42 Staff parking is already at over capacity at the Dunbrik depot.

Current Operational Collection issues

Issue	Detail	Operational impact	Solution on KAT modelling
Increased residual waste weights	We currently collect 26,500 tonnes of residual waste, which puts us in the bottom quartile of National performance, which is increasing year on year.	Service failure is inevitable if levels of waste continue to increase. Early signs the service is facing difficulties collecting all waste streams weekly.	Change required to collection methods
Increasing recycling weights	New reusable recycling bags have a larger capacity of 190 litres.	Our 30% split-back vehicle capacity is already starting to be overwhelmed. This will result in more mixing or non-collection of waste	Change required to collection methods
Insufficient split-back HGV vehicles.	Unable to source bespoke 50/50 split vehicles for over 12 months, if they can be afforded.	As above	Change required to collection methods
High cost of service delivery	Weekly collection of all waste streams is costly, reducing vehicles and resources can be achieved by collecting waste on alternate weeks.	Without change the collection service has an increased risk of service failure and over-spends on current budgets.	Change required to collection methods
Introducing new recycling services, such as food and glass	A legislative requirement by March 2026.	It will not be physically possible to collect all waste streams weekly from March 2026 without changes to the current collection method.	Change required to collection methods

Issue	Detail	Operational impact	Solution on KAT modelling
Mixing residual and recycling waste	Lack of split-back vehicles. Also, the rural nature of the District does not allow 26 tonne access so smaller vehicles need to be used.	Only collecting one waste stream weekly completely resolves both issues, so no waste mixing and reduced likelihood of missed collections.	Change required to collection methods
Not collecting waste on the scheduled day of collection	The volume of residual waste is the main reason for not collecting waste.	As above	Change required to collection methods
Ageing fleet and lack of enough split back vehicles	The 5-year vehicle replacement programme is working to replace older vehicles.	This programme will see a cost reduction as split-back vehicles will not be required with a change to weekly collections.	Change required to collection methods

43 If left unresolved the issues highlighted in the table above will result in service failures and will undermine the increasing of recycling across the District, which is the main aim of the new reusable recycling green bags and the Council's Waste and Recycling strategy.

44 The only recognised solution is to review urgently the waste collections methods as soon as practicably possible. The desktop review therefore recommends the following operational changes throughout 2025 and into 2026.

Preferred Option

Operational Change Chronology

45 This option would retain our existing infrastructure and urgently review our weekly collections methods in 2025 and beyond. It will also provide a desktop review phase 2 report to members at the next Cleaner & Greener Advisory committee meeting.

46 January 2025 - The first operational changes that need to take place are the procurement of specialised food and glass vehicles and waste containers such as food caddies and boxes for glass. This will be followed by the recruitment of additional staffing to operate these new weekly and bi-weekly services. These actions achieve all four objectives of the waste and recycling strategy.

Vehicle Procurement	Cost (£m)	Funded by	Timescales
8 x 7.5 tonne food waste collection vehicles	0.905 (one off)	DEFRA capital food waste grant.	Purchased. Delivery 12 months (Due January 2026)
TOTAL	£0.905m		

Container Procurement	Cost (£m)	Funded by	Timescales
55,000 7 litre and 23 litre food caddies.	0.358 (one off)	DEFRA capital food waste grant.	Delivery 3 to 4 months
55,000 36L Glass Collection Basket with additional metal carrying handle	0.294 (one off)	Extended Producer Responsibility (EPR) payment	Delivery 3 to 4 months
TOTAL	£0.652m		

Staff Recruitment	Cost (£m)	Funded by	Timescales
24 new staff (Drivers & Loaders) for food and glass collections	0.700 (ongoing)	Extended Producer Responsibility (EPR) payment	January 2026 recruitment process
TOTAL	£0.700m		

- 47 May 2025 – The second phase of the desktop review will be to run a digital optimisation project, which will last between 3 to 6 months that reviews waste collection round efficiency and effectiveness of alternate weekly collections by looking at round size, vehicle and staffing requirements, along with reducing fuel use and carbon emissions. A fully costed fleet options and the use of wheelie bins will form part of this second phase review. Further live round data will also be fed into this review, using tonnages collected.
- 48 June 2025 – A robust and clear communication plan will be rolled out to engage and inform residents of the timeline for change and the journey we are taking on waste collection methods.
- 49 Summer 2025 – The second phase report will be presented to the Cleaner & Greener Committee on all options to change our waste collection methods for domestic waste and recycling. This will achieve several objectives:
- a) Gearing us up to being able to introduce additional recycling collection services of glass and food by March 2026.
 - b) A cost reduction through efficiencies in collection round vehicles and resources.
 - c) Evidence shows that changing our collection methods could reduce residual black waste collected and increases recycling rates.
- 50 October 2025 – Start the roll out of new food caddies and glass boxes to all households.
- 51 March 2026 – New and additional recycling kerbside services will be introduced for all households for food waste and glass.
- 52 March 2026 – Additional recycling services will be reviewed to be added to the weekly collections, such as textiles and small electrical items.

Other Options considered.

- 53 Increasing the fleet and staffing resources was considered, however the Dunbrik depot is at full capacity for staffing, operational delivery and for the storage of vehicles. This pressure will increase with the redevelopment of Otford Road Depot as this is currently used to store bins, which will increase (food & glass) and houses non-operator's licence vehicles (small vans).
- 54 No alternative space has yet been identified to replace that potentially lost at Otford Road. It has also not been possible to acquire any more space within the wider Dunbrik site.
- 55 To keep the existing service running it would require substantial investment in a new larger depot, which is not achievable in the timeframe.

56 Phase 2 of the desktop review will look at the waste industry standard, supported by DEFRA of a new fleet with integrated bin lifts and wheelie bins as the main waste containers. The phase 2 review will look at a full feasibility and cost survey for Members to consider.

Wheelie Bins

57 Following a Health & Safety Executive inspection, the Council received a written formal breach notice of Manual Handling Operations 1992 Regulations 4 (1) and 4 (1) b.

58 The material breach stated:

- a) Your employees are manually handling unknown weights as the domestic collections carried out are using black sacks. This is 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 is already 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.

59 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.

60 It is therefore important that the Council explores all of the options available to it, within the resources available, to ensure that where practicable we eliminate manual handling risks. Long-term this would be achieved with wheelie bins and integrated lifts for residual and recycling waste. This was supported as a future action by nearly 70% of residents in the BIG Waste Conversation.

Conclusion

61 Given the information presented in this report, there is a clear compelling and urgent case to change the way we collect kerbside waste and recycling. The service risks collection failures, risks the health and safety of staff operating the service and will simply not be able to implement the new legislative changes required, if our collection methodology doesn't change.

62 Without these changes and a second phase review the service will see more serious service failures with waste either not being collected or waste being

mixed. Given that the presented waste weight is so high we also risk running out of resources, such as staff and vehicles available to collect the waste daily.

63 It should be noted that with the preferred option detailed in this report the operational risk of severe service failures remains until the preferred option is fully implemented.

Key Implications

Financial

The following specific funding has been allocated by Government that will help to finance some changes:

Extended Producer Responsibility (EPR) – Funding allocated by DEFRA £1,174,000 (annual funding but amount expected to reduce).

Capital Allocation for Food Waste – Funding allocated by DEFRA £1,181,206 (one off funding)

Preferred Option – Summary of potential costs

	One-off cost £m	Annual cost £m
Vehicle procurement	0.905	-
Container procurement	0.652	-
Food and glass staffing	-	0.700
TOTAL	1.557	0.700

Funding summary

	One-off £m	Annual £m
DEFRA EPR funding (all years)	-	0.700
DEFRA EPR funding (remaining) 2025/26	0.376	-
DEFRA Food Waste funding	1.181	-

TOTAL	1.557	0.700
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Legal Implications and Risk Assessment Statement.

Under section 45 of the Environmental Protection Act 1990, Sevenoaks District Council is 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.

Following a Health & Safety Executive inspection, the Council received a written formal breach notice of Manual Handling Operations 1992 Regulations 4 (1) and 4 (1) b. 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.

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.

Climate Change Implications

The decisions recommended in this paper directly impact our climate change ambition. This is because of the significant increasing of recycling of materials, reduce our fuel use and a reduction in single use plastics, while decreasing residual waste. 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 A – Big Waste Conversation Survey results

Appendix B – Desktop Review Model – Phase 1

Background Papers Waste and Recycling Strategy

<https://sevenoaks.moderngov.co.uk/documents/s59777/08%20-%20Appendix%201%20-%20Domestic%20Waste%20Recycling%20Strategy.pdf?J=1>

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