

**Classification:** Public

**Key Decision:** No

## **Gravesham Borough Council**

**Report to:** Operational Services Cabinet Committee  
**Date:** Monday 3 June 2024  
**Reporting officer:** Assistant Director (Operations)  
**Subject:** Waste & Recycling Service Development Proposals 2024

### **Purpose and summary of report:**

To present Members with the proposed changes to the council’s waste & recycling service in response to the Government’s “Simpler Recycling” proposals.

The recommended option will see the council adding glass to its co-mingled recycling service. The other change will see food waste collected in separate vehicles from refuse and recycling.

### **Recommendations:**

The Committee’s views are sought prior to the decision being made by the Portfolio Holder.

<b>Key Implications:</b>	
<b>Item</b>	<b>Implications</b>
<b>Legal</b>	Under the Environment Act 2021, the Government is introducing “Simpler Recycling” which will ensure that Local Authorities collect a set list of dry recyclables from the kerbside including weekly food waste collections by 1 April 2026.
<b>Finance and Value for Money</b>	The agreed option has been calculated as the cheapest and most efficient option for the council moving forward.
<b>Corporate Plan</b>	#Oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy
<b>Climate Change</b>	Under the proposals set out in this report, the Council will be procuring Euro 6 vehicles which is the current industry standard. There are options to convert to alternate fuels at the appropriate time to meet the 2030 climate commitments.

## **1. Background & Service History**

1.1 In 2014 the Council made the first of two major changes to the refuse and recycling service. The first phase in 2014 commenced with the introduction of

- wheelie bins for recycling and a completely new separate weekly food waste collection service.
- 1.2 The second phase in 2017 brought in the introduction of wheelie bins for residual waste and included the move to an “alternate weekly collection” method for residual waste and recycling.
  - 1.3 The changes to the refuse and recycling service in 2014 and 2017 resulted in;
    - 1.3.1 An increased range of materials collected from households for recycling, thereby significantly increasing the borough’s recycling rate which at the time was one of the lowest in the country.
    - 1.3.2 The workplace being made safer for the waste collection staff through the introduction of wheelie bins to replace the sack-based system. This is based on evidence from the HSE (Health and Safety Executive), showing a reduction in manual handling injuries.
    - 1.3.3 An updated refuse collection vehicle fleet which at the time was old and outdated.
    - 1.3.4 A cleaner street-scene with the introduction of wheelie bins to replace sacks. The sack-based collection regularly led to sacks being split open by animals, causing litter problems across the whole borough.

## **2. Impact of Waste Service Changes made since 2014**

- 2.1 The introduction of the refuse and recycling service had the following positive impacts;
  - 2.1.1 The borough’s recycling rate increased from 24.5% in 2013-14 to 40% in 2023/24 by providing more recycling options and restricting the amount of residual waste that residents could present for collection.
  - 2.1.2 There was a reduction in workplace accidents caused by manual handling injuries due the introduction of wheelie bins to replace the sack collection system across most of the borough.
  - 2.1.3 Cleaner streets due to the refuse and recycling being contained in wheelie bins.
  - 2.1.4 The new collection vehicles had the latest Euro 6 emissions equipment, this meant that the council led the way in reducing carbon emissions arising from the refuse collection vehicle fleet. Euro 6 vehicles are still the industry standard for environmentally clean vehicles.

## **3. Government Proposals for Waste Management**

- 3.1 The Government started consulting on the “Collections and Packaging Reforms” in the Summer of 2021. These consultations included Consistency of Collection Reforms, Deposit Return Scheme (DRS) and Extended Producer Responsibility (EPR).
- 3.2 From the start of this consultation process, there have been delays in bringing these national proposals forward. The first delay was on 25<sup>th</sup> July 2023, when the Government announced that EPR would be delayed by 12 months from 2024 to 2025.

- 3.3 On the 21 October 2023, the Government announced that it was re-framing the consistency of collections package and putting forward an updated version under the banner of “Simpler Recycling.”
- 3.4 Much of the “Simpler Recycling” proposal was the same as the Consistency proposals, with the main change being the removal of the need for councils to collect a range of materials separately from each other and that residual waste collections should remain fortnightly at the very least.
- 3.5 The need to collect the standard mix of recyclables (paper and card, plastic, metal and glass), weekly food waste and the offer of garden waste collections remained.
- 3.6 New legislation is due to be put in front of Parliament during the Spring 2024 to remove the need for councils to carry out a TEEP (Technically, Environmentally and Economically Practical) assessment if they want to collect the recyclable materials in one bin (this is termed as co-mingled).
  - 3.6.1 There are several target dates remaining for domestic collections which have been set out in the Government’s proposal;
    - 3.6.1.1 All properties must receive a separate collection of dry recyclables (paper, cardboard, plastic, metal and glass) from the kerbside by 31 March 2026.
    - 3.6.1.2 All properties must have a weekly separate weekly food waste collection from the kerbside by 31 March 2026
    - 3.6.1.3 Garden waste collections must be offered to all properties by 31 March 2026
    - 3.6.1.4 All properties must have a plastic film kerbside collection by 31 March 2027
    - 3.6.1.5 Residual waste must be collected at least every two weeks.
  - 3.6.2 Simpler Recycling also includes proposals for the collection of waste from businesses. Businesses must have the following waste collections by the dates set out below:
    - 3.6.2.1 Dry recyclables (paper, cardboard, plastic, metal and glass) by 31 March 2025.
    - 3.6.2.2 Food waste collections by 31 March 2025.
    - 3.6.2.3 Plastic film collections by 31 March 2027.
- 3.7 The lengthy delays in the Government bringing forward these proposals has caused huge problems and uncertainty for councils and the industry as a whole.
- 3.8 The delays have caused the Council several problems as outlined below:
  - 3.8.1 The council had a clear replacement plan for its refuse collection vehicles, however, this was put on hold due to the potential changes in the regulations which may have dictated the type of vehicle required. The standard life of a refuse collection vehicles is generally accepted to be 6 to 8 years. The delays to the procurement process resulted in a high proportion of the current fleet becoming over 10 years old which in turn has led to increased breakdowns and repair costs.

- 3.8.2 The delay in the Government making a final policy decision on recycling collections and the waste sector's future funding meant the council has been delayed making any changes (such as the addition of glass collections) to the kerbside recycling collection service.
- 3.8.3 The Government's delay has led to a delay in the service updating the refuse and recycling collection schedules. Over the past decade there has been a considerable amount of house building which means the current collection schedules are outdated. An efficiency exercise will not be carried out until the council knows what the Government policy for the future is and the collection service that will be operated.
- 3.9 Now that the basis of the "Simpler Recycling" proposals have been published, it is possible to assess and determine the best way forward for the service including the procurement of the most appropriate vehicles. The Council will introduce glass to its kerbside recycling collections and expand its recycling service to hard-to-reach areas and flatted developments.

#### **4. Materials Recovery Facility (MRFs) - Technological Developments**

- 4.1 Since 2014, there have been huge technological advances at the MRFs. The council's recycling goes to Crayford MRF which is the largest MRF in the UK and is run by N&P Group.
- 4.2 Investment in modern sorting equipment has also led to better quality material being produced by the facility.
- 4.3 One of the biggest changes in recent years has been the extraction of glass from the mixed recycling stream. In the past glass produced from the process was of a poor quality so was sent to make aggregate for the construction and transport industry, hence why glass wasn't included in the council's recycling stream. This has now changed, so the glass which goes through the sorting facility is sent for glass re-melt meaning new glass bottles and containers can be produced.

#### **5. Waste & Recycling Service Development Proposals 2024**

- 5.1 Following consideration of the information outlined within the report several proposals were considered to take the waste & recycling service forward over the coming years.
- 5.2 Specifically, the following considerations were considered in developing the new service proposals:
  - 5.2.1 The Government Simpler Recycling Proposals
  - 5.2.2 Ability to co-mingle dry recycling materials so adding glass to the recycling collection which will have a positive impact on the borough's recycling rate.
  - 5.2.3 Vehicle reliability (and the current need to replace the freighters).
  - 5.2.4 Adverse impact of repair levels on the vehicle workshop.
  - 5.2.5 Efficiency of the service and opportunity to streamline the service.
  - 5.2.6 Ability to develop a more resilient vehicle profile (by vehicle type and age).
  - 5.2.7 Flexibility of the service and the ability to adapt in response to operational issues or demands.

5.2.8 Cost of the service.

5.2.9 Environmental considerations:

5.2.9.1 Vehicles

5.2.9.2 Fuel usage

5.2.9.3 Recycling collection / capture levels

5.2.10 The above factors were taken into account and given due consideration in shaping three options for developing the refuse and recycling

5.2.11 The three options considered were:

**Option 1 - Fully Co-mingled recycling collection (including glass) with food collected in same vehicle as refuse/recycling.**

- Residual collected every two weeks.
- Recycling collected every two weeks - Co-mingled collection of paper, cardboard, plastic and glass.
- Food waste collected weekly.
- Use of food pod vehicles to collect food waste on the same vehicle as refuse/recycling.

**Option 2 - Fully Co-mingled option (including glass) with food collected in separate vehicle as refuse/recycling**

- Residual collected every two weeks.
- Recycling collected every two weeks - Co-mingled collection of paper, cardboard, plastic and glass.
- Food waste collected weekly.
- Residual and recycling collected separately in standard RCVs.
- Food collected separate from residual / recycling using smaller RCV's.

**Option 3 - Part co-mingled recycling collection service with paper/card collected separately from glass, plastic and metals.**

- Residual collected every two weeks.
- Recycling collected every two weeks - Paper and cardboard collected separately from plastic and glass.
- Food waste collected weekly.
- Recycling collected using dual compartment (Twin pack) vehicles.
- Food collected separately using smaller RCV's.

## 5.3 Financial Evaluation

5.3.1 The different options have been financially modelled which are shown below.

5.3.2 The current staffing costs are budgeted as £1,786,950.

### 5.3.3 Option 1

#### **Staffing Costs**

5.3.3.1 The anticipated staff cost of the service is £1,815,060.

5.3.3.2 This option has high staff costs.

#### **Vehicle Costs**

5.3.3.3 The anticipated total fleet capital cost is £4,230,000, however the initial replacement costs can be reduced to £1,785,000 through procuring used and refurbishing current vehicles.

5.3.3.4 This option has high vehicle procurement and maintenance costs.

#### **Total Costs**

5.3.3.5 The total implementation cost would be £3,600,060

### 5.3.4 Option 2

#### **Staffing Costs**

5.3.4.1 The anticipated staff cost of the service is £1,625,060.

5.3.4.2 This option has the lowest staff costs.

#### **Vehicle Costs**

5.3.4.3 The anticipated total fleet capital cost is £3,490,000, however the initial replacement costs can be reduced to £1,180,000 through procuring used and refurbishing current vehicles.

5.3.4.4 This option has the lowest vehicle procurement and maintenance costs.

#### **Total Costs**

5.3.4.5 The total implementation cost would be £2,805,060

### 5.3.5 Option 3

#### **Staffing Costs**

5.3.5.1 The anticipated staff cost of the service is £1,857,850

5.3.5.2 This option has high staff costs.

#### **Vehicle Costs**

5.3.5.3 The anticipated total fleet capital cost is £4,550,000, however the initial replacement costs can be reduced to £2,525,000 through procuring used and refurbishing current vehicles.

5.3.5.4 This option has high vehicle procurement and maintenance costs.

**Total Costs**

5.3.5.5 The total implementation cost would be £4,382,850

5.3.6 The table shows a summary of the total costs.

	Option 1	Option 2	Option 3
Staff	£1,815,060	£1,625,060	£1,857,850
Vehicles	£1,785,000	£1,180,000	£2,525,000
<b>Total</b>	<b>£3,600,060</b>	<b>£2,805,060</b>	<b>£4,382,850</b>

5.4 Options Evaluation

5.4.1 Each of the options were evaluated for pros and cons which are shown below;

<b>Option 1 Fully Co-mingled recycling collection (including glass) with food collected in same vehicle as refuse/recycling.</b>	
<b>Pros</b>	<b>Cons</b>
<p>Slight modification to service to improve operational efficiency.</p> <p>Single vehicle domestic collections</p> <p>Current fleet specification can be utilised to continue this service.</p> <p>Adding glass will have a positive impact on the borough's recycling rate.</p>	<p>More expensive and complicates the service for residents which could reduce recycling capture rates.</p> <p>Slower collection process which has a negative effect in causing increased traffic congestion plus increased emissions.</p> <p>Requirement for multiple spare vehicles</p> <p>More staff and vehicles required</p> <p>Pod or Twin pack vehicles 12 to 24 months lead time</p> <p>Vehicles have smaller weight capacity so will need to empty off on multiple occasions per day (lower volume bodies)</p> <p>High vehicle purchase costs</p> <p>Low vehicle residual value</p>

	Continue to run expired high-risk vehicles due to age
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<b>Option 2 Fully Co-mingled option (including glass) with food collected in separate vehicle as refuse/recycling.</b>	
<b>Pros</b>	<b>Cons</b>
<p>Co-mingled collections are easier for residents to use</p> <p>Less containers required for residents to store especially in areas where waste material storage is limited.</p> <p>Fleet and vehicle requirements are uncomplicated as standard RCVs are used across the service.</p> <p>Lowest staff numbers required to operate the service.</p> <p>Highest capacity (Volume and weight) vehicles, reduced tipping per day so generating greater efficiency.</p> <p>Lowest vehicle purchase cost of the three service options</p> <p>Increased narrow access options Recycling / Garden / Trade waste available to the collection operation.</p> <p>Immediate service launch possible due to utilisation of existing fleet and available used vehicles.</p> <p>Reduced missed collections with a dedicated food waste collection because crews have more time to check properties.</p> <p>Food waste vehicles are smaller, so it is easier to access hard to reach areas.</p> <p>Higher availability of drivers as food waste vehicles are smaller so drivers do not require HGV licence.</p> <p>Adding glass will have a positive impact on the borough's recycling rate.</p>	<p>Multiple vehicles per domestic collection</p>

**Option 3 Part co-mingled recycling collection service with paper/card collected separately from glass, plastic and metals with food collected in separate vehicle as refuse/recycling.**

<i>Pros</i>	<i>Cons</i>
<p>Segregated waste streams would provide better quality materials from the recovery process.</p> <p>Single vehicle domestic collections.</p> <p>Reduced missed collections with a dedicated food waste collection because crews have more time to check properties.</p> <p>Food waste vehicles are smaller, so it is easier to access hard to reach areas.</p> <p>Higher availability of drivers as food waste vehicles are smaller so drivers do not require HGV licence.</p> <p>Adding glass will have a positive impact on the borough's recycling rate.</p>	<p>More expensive and complicates the service for residents which could reduce recycling capture rates.</p> <p>Slower collection process which has a negative effect in causing increased traffic congestion and emissions.</p> <p>Require extra containers so may cause an issue for residents in areas where storage is limited.</p> <p>Current fleet unable to transition to this service</p> <p>More staff and vehicles required, so increased costs.</p> <p>Double weighing and tipping would be required for the separate waste streams</p> <p>High maintenance of the equipment required for this method of collection.</p> <p>Pod or Twin pack vehicles 12 to 24 months lead-time</p> <p>Tipping multiple occasions per day (lower volume bodies)</p> <p>Highest vehicle purchase costs of all the service options</p> <p>Low vehicle residual value</p> <p>Limited options for alternative tipping arrangements</p> <p>Extended time tipping multiple compartments.</p> <p>Delayed service launch due to vehicle availability</p>

5.5 Other considerations

- 5.5.1 Recent advances in refuse vehicle technology and particularly smaller and medium sized vehicles have allowed us to demonstrate and trial numerous types of vehicle, we would utilize small and medium RCV's to deliver Option 2.
- 5.5.2 Fleet and vehicle requirements for option 2 are uncomplicated, opting for standard RCV's will have the effect of running a more straightforward and standard service, enabling utilisation of vehicles and crews to any round or service type without compromise. Vehicle maintenance provision will also benefit due to reduced number of serviceable components on a standard RCV, also reducing the risk of vehicle breakdowns due to equipment failure.
- 5.5.3 A proportion of our current fleet is overdue for replacement and marked red on our "RAG" fleet plan, as a consequence of the delay in Government proposals. The transition to option 2 will start with replacing these expired RCV's and the acquisition of new or quality used vehicles to continue with a hybrid "current + option 2" service. We will continue to run food pod trucks until refurbishment and re-bodying works can be carried out on the re-usable vehicles. Eventually we will have a refreshed fleet of standard bodied RCV's compliant with a simple collection and disposal regime.
- 5.5.4 The main difference between current and option 2 effects the domestic rounds we currently use 8 x food pod trucks, 8 x HGV drivers and 24 x loaders. Option 2 requires 9 x RCV's (6 x large, 3 x small), 9 x HGV drivers and 18 x loaders. Smaller RCV's would access narrow and restrictive areas both urban and countryside, there's an inherent versatility of single waste stream vehicles to be utilized freely where needed, simplified collection and tipping methods, the ability to divert to alternative disposal facilities if required.

## **6. Recommended way forward**

- 6.1 Following the consideration of all the options, Option 2 is recommended as the best way forward with the refuse and recycling service.
- 6.2 The proposed service moving forward would be a fully co-mingled option (including glass) with food collected in separate vehicles. The service would provide;
- Residual waste collected every two weeks.
  - Recycling collected every two weeks - co-mingled collection of paper, cardboard, plastic, metal and glass.
  - Food waste collected weekly.
  - Food collected separate from residual / recycling using smaller RCV's.
- 6.3 The inclusion of glass in the co-mingled recycling is an easy change so would be implemented as quickly as possible. The addition of glass to the recycling service will have a positive impact on the borough's recycling rate.
- 6.4 The other changes to the service including the change of collection vehicles would be implemented over the next 12-18 months dependant on the funding available and procurement timescales for the vehicles.

- 6.5 As part of the changes to the service, a rescheduling exercise will be carried out to make sure the new service is as efficient as possible.
- 6.6 A communications plan is currently being devised with the Communications Manager to support the changes to the waste and recycling service.
- 6.7 Further reports will be brought to Operational Services Committee in the future to update Members on the progress of the proposed changes.

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<b>Secondary Implications</b>	
<b>Risk Assessment</b>	The Council has to make changes to its refuse and recycling service. Any delay in making a decision and making the appropriate changes could lead to the council missing the 1 April 2026 deadline due to delays in procurement of vehicles and containers.
<b>Data Protection Impact Assessment</b>	<i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i>
	a. Does the project/change being recommended through this paper involve the processing of <a href="#">personal data</a> or <a href="#">special category data</a> or <a href="#">criminal offence data</a> ?  A definition of each type of data can be found on the Information Commissioner's Office website via the above links.  No
	b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice?  NA
	c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at <a href="mailto:gdpr@medway.gov.uk">gdpr@medway.gov.uk</a> .  NA
<b>Equality Impact Assessment</b>	a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer.  No
	b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer.  NA
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
<b>Crime and Disorder</b>	There are no implications
<b>Digital and website implications</b>	There will changes required to the website when the new service is implemented.
<b>Safeguarding children and vulnerable adults</b>	There are no implications