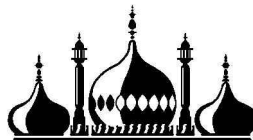


# Final Report Summary

## Sustainability Appraisal of the Brighton & Hove Municipal Waste Management Strategy

Prepared for

**Brighton & Hove  
City Council**



**Brighton & Hove**

by



working with  
**Beyond Waste**

**Consultation Version Issued  
March 2009**

## Summary

Sustainability Appraisal (SA) is a process that assesses the environmental, social and economic consequences of a plan and its policies and seeks to identify ways of achieving a sustainable balance between these considerations. It identifies and reports on the likely significant effects of a plan and the extent to which the implementation of the plan will contribute to sustainable development.

Throughout the Municipal Waste Management Strategy (MWMS) process the work on sustainability appraisal has been integrated with strategy development, to ensure sustainability principles have informed the strategy itself. This summary report documents the Sustainability Appraisal of the objectives, targets and policies of the MWMS and makes recommendations for monitoring the implementation of the strategy. The full Sustainability Appraisal Report is also available from [REDACTED].

### 1. Sustainability Appraisal Objectives and Indicators

An SA Framework was developed and reported on in the SA Scoping Report in February 2007. This involved identifying SA Objectives and Indicators which are appropriate for appraising the MWMS. The initial SA Objectives and Indicators were revised in response to a consultation process and the final set of SA Objectives used is shown in Table 2 below. The proposed indicators can be seen in the full table in section 4 of the report.

**Table 2**

<b>SA Objectives</b>	
<b>Ensuring a strong, healthy and just society</b>	
SAO1	Delivering a high quality residual waste collection service with equality of access.
SAO2	Delivering a high quality recycling service with equality of access.
SAO3	Achieving community acceptability and increasing levels of participation in re-use, recycling and composting.
SAO4	Improving Health & Safety.
SAO5	Improving wellbeing.
SAO6	Minimising the council tax burden of the service.
<b>Living within Environmental Limits</b>	
SAO7	Improving air quality.
SAO8	Minimising the effect on climate change.
SAO9	Managing/ improving the quality of the physical environment.
SAO10	Reducing the total amount of waste sent to landfill.
SAO11	Reducing the biodegradable proportion of waste sent to landfill.
SAO12	Increasing the amount of materials re-used and recycled.
SAO13	Increasing the amount of material composted.
SAO14	Reducing total waste arisings.
<b>Achieving a Sustainable Economy</b>	
SAO15	Ensuring the cost effectiveness and practicability of residual waste collection.
SAO16	Ensuring the cost effectiveness and practicability of re-use and recycling.
SAO17	Reducing road congestion.
SAO18	Encouraging sustainable resource use and maximizing the value of recyclables.
SAO19	Developing a broadly-based innovative local economy with high value/low impact activities.
SAO20	Developing and maintaining a skilled work-force to support long-term competitiveness.
<b>Promoting Good Governance</b>	
SAO21	Carrying out effective, wide ranging consultation on the waste management strategy and the associated sustainability appraisal and implement ongoing communication/ education campaign.
SAO22	Ensuring compliance with statutory duties and legal requirements.
<b>Using Sound Science Responsibly</b>	
SAO23	Reviewing new developments in waste management technologies & techniques.

## 2. Brighton & Hove MWMS

Brighton & Hove City Council has now produced a draft Municipal Waste Management Strategy (MWMS) for consultation. Although an SA is not a statutory requirement for this strategy, the Council wishes to ensure the strategy development process is robust and transparent and fully incorporates sustainability considerations. Sustainability Appraisal has been integrated into the process of options appraisal and the development of the MWMS to ensure that sustainability implications have been considered throughout the process. The results of this are documented in the full report. This summary presents the essential content of the main report.

### Overarching Objectives

The Strategy sets out how Brighton & Hove City Council (BHCC) will achieve its aims of reducing waste and increasing recycling and composting. The objectives of the MWMS are to:

- Prioritise the waste hierarchy by reducing the overall volume of municipal waste generated in Brighton & Hove and maximise recovery of value from the waste that isn't avoided.
- Maximise diversion of waste from landfill to minimise the council's financial liabilities under the Landfill Allowance Trading Scheme (LATS), and minimise other such costs such as landfill tax.
- Ensure compliance with other emerging legislation which requires greater segregation of waste and recycling and recovery practices, often requiring increasingly complicated technology (for example legislation covering the disposal of electronic equipment [WEEE] and hazardous wastes).
- Further increase the sustainability of waste management practices in Brighton & Hove taking into account new targets set out in the national waste strategy.
- Plan for further continuous improvement in services in relation to refuse and recycling and in particular, ensuring services are cost effective and are available to all.
- Protection of our environment through minimising impacts on the physical environment, air quality and emissions and protection of human health and well being.
- Ensure costs of services present value for money for council tax payers.

### Targets

Targets for the strategy (see Table 1) have been produced taking into account what can realistically be achieved, likely future government set targets and minimising the cost increases associated with disposal to landfill.

**Table 1**

Target	Current Performance (2007/08)	2012/13	2015/16	2020/21
Recycling & Composting	28.45%	32%	40%	45%
Energy recovery	11%	56.1%	55%	53%
Landfill	60.6%	11.6%	5%	2%

### Policies

The strategy policies and principles are then explained. Accompanying the strategy is an action plan setting out the policies and associated tasks in more detail. The focus of the strategy is municipal waste, for which the Council has direct responsibility. Most of this is household waste and recycling, but it also includes waste from street and beach cleaning operations.

### 3. Impact assessment

The proposed strategy objectives were appraised against the SA Objectives at earlier stages in the development of the strategy, and a number of changes have been made.

#### 3.1 Strategy objectives

The current strategy objectives overall were found to be broadly compatible with the sustainability objectives, emphasising the importance of moving waste up the waste hierarchy; maximising diversion of waste from landfill; meeting LATS and other regulatory requirements and government targets; and planning for continuous improvement in service delivery.

The assessment also showed that the MWMS objectives do not fully address the sustainable economy aspects, in particular SAO19 – ‘Developing a broadly-based innovative local economy with high value/low impact activities’. To meet this more explicit emphasis could be given to local re-use, recycling and composting opportunities. Also SAO21 – ‘Carrying out effective, wide ranging consultation on the waste management strategy and the associated sustainability appraisal and implement ongoing communication/ education campaign’ was not seen to be fully covered, to remedy this explicit commitment should be made to ongoing communication and education.

It is suggested that the MWMS objectives be amended in order to better reflect all aspects of sustainability. Recommendations are to:

- Introduce a more explicit reference to social aspects such as community acceptability, increasing participation in recycling and re-use, and including the importance of ongoing communication and education measures. This could be added to the fifth objective.
- Include a reference to the importance of promoting local re-use, recycling and composting facilities where they enhance strategy sustainability, perhaps also as an addition to the fifth objective, as part of promoting a sustainable local economy.

#### 3.2 Strategy targets

The Council has been rigorous in ensuring targets set are achievable. We note the tension between realistic targets and those set in Waste Strategy 2007 and Regional Policy for recycling and composting. While a wish to avoid setting targets that will not be met is understandable, ambitious targets can encourage more radical action. The current target gap leaves considerable scope for improvement and we note that the intention to review these in 2011 will present an opportunity to ‘raise the bar’ as the proposed measures and service delivery changes take effect.

The reduction in landfill to 2% by 2020, achieved by introducing the energy from waste plant, clearly helps in terms of reducing landfill dependence. However this plant will only be able to deal with around half the waste produced in Brighton & Hove and East Sussex, which as pointed out in the strategy should not detract from achieving ambitious recycling and composting rates. A more sustainable solution would be to prioritise recycling and composting, to achieve 50% (or higher, e.g. the 55% proposed in the RPG) by 2020. Residual waste could then be incinerated knowing that real efforts have been made to maximise recycling.

#### 3.3 Policies and Action Plans

The strategy policies and principles, together with the actions and tasks assigned to these in the Action Plan, are considered in a matrix (see Appendix B). Each action is assessed against the SA Objectives using a rating system. Summary tables were then produced for each policy, drawing on the assessment matrix to describe the effects and indicate any mitigation measures proposed.

Overall very few significant adverse effects on the SA Objectives were identified; however mitigation measures were proposed which aim to enhance the positive effects of the policies. These are outlined in Table 3 below:

Table 3

Policy	Mitigating measures
Policy 1: Waste Minimisation and Prevention.	<ul style="list-style-type: none"> <li>• Enforcing side waste policy should be done as far as possible in an educational manner to encourage behaviour change.</li> <li>• Creative and targeted approaches should be adopted for the waste awareness and reduction campaign, acknowledging different elements of the community and different waste streams. Food waste reduction is mentioned in the detail of the action plan which is wholeheartedly endorsed. This has been recently brought to national attention and has many potential benefits, social, economic and environmental.</li> <li>• Excess packaging is something people often complain about in the context of waste reduction, so efforts to tackle this in conjunction with Trading Standards as proposed are welcomed. This could perhaps be extended as part of action 1.4 to include the role of consumer choice in terms of packaging purchased and the use of re-usable bags, since this is very much on the agenda now. Retailers could also be engaged in this debate and perhaps involved in the campaign, and linkage could also be made with shopping for local produce.</li> <li>• 'Zero waste' (sometimes interpreted as zero waste to landfill) is a concept some local authorities (e.g. Bath and North East Somerset) are using to inspire creative ways to minimise waste and move beyond the best currently achieved diversion rate of about 50%. Waste Strategy 2007 endorsed this concept by announcing a 'Zero Waste Places initiative' encouraging exemplars of good practice on waste. The MWMS takes valuable steps towards this by emphasising minimisation, re-use and recycling. Useful lessons may be learned for future development of the strategy from other councils using this as an organising principle.</li> </ul>
Policy 2: Improving rates of re-use.	<ul style="list-style-type: none"> <li>• Partnerships with charities and community organisations have real potential for increasing re-use – this should include opportunities for repair/refurbishment of items.</li> <li>• Promotion of communal exchange events including 'Give and Take days' where people leave items out for others to take and the Council cleans up at the end of the day, and also car boot sales.</li> <li>• Maximise re-use opportunities at HWRS – e.g. encourage introduction of an on-site shop at the Wilson Avenue site along the lines of that in Hove and ensure effective separation of re-usable items at both sites.</li> <li>• Encourage support of local repair schemes through economic development activities.</li> </ul>
Policy 3: Increasing recycling rates.	<ul style="list-style-type: none"> <li>• Strongly endorse the action plan target for 3.1 of ensuring all properties without kerbside recycling have a bring site within 500m. This will be especially important for increasing recycling in central parts of the city.</li> <li>• Bring sites need to be well maintained and frequently emptied. Also signage to bring sites and on recycling bins themselves needs to be clear and simple, including pictures to cater for non English speakers.</li> <li>• In addition to bring sites for residents, street bins catering for recycling should be expanded on the seafront and elsewhere in the city centre. Again clear, simple labelling will be important to ensure success. The 'Recycle on the Go' campaign has been recently launched by defra and partners – BHCC should take an active role in this.</li> <li>• Ref action 3.6, increasing recycling at the HWRS while being important in it's own right can also reinforce the message that the Council is serious about recycling. There are other opportunities here too – by ensuring staff are well informed about recycling this can help with ongoing education; also there may be opportunities to increase collaboration with local recycling or composting businesses thus</li> </ul>

	<p>helping the local economy.</p> <ul style="list-style-type: none"> <li>• Consideration should be given to supporting local materials recycling where possible, e.g. use of recycled glass to make work surfaces and other products in Newhaven (eight inch ltd). Onward transportation of recyclate, particularly by road, has considerable environmental impact and should be minimised where possible.</li> <li>• BHCC could take a leading role in green procurement and encouraging 'closed loop' recycling. Purchasing policy could involve doing an inventory of potential uses of recycled materials in council activities, e.g. street furniture (plastic); paving sand (glass); office stationery (paper) etc.</li> </ul>
<p>Policy 4: Increasing composting rates.</p>	<ul style="list-style-type: none"> <li>• Keep to the timescale for reviewing food waste collections by 2011, and include consideration of the feasibility of expanding the capacity of the in vessel composting facility referred to in the strategy to allow local composting to take place to a good standard.</li> <li>• Consider food waste collection &amp; on-site in-vessel composting for large blocks of flats as has been introduced in parts of London.</li> <li>• Continue to support and help expand local initiatives such as BCCC and consider marketing compost produced locally, e.g. at HWRS to encourage the idea of 'closed loop' recycling.</li> </ul>
<p>Policy 5: Residual waste collection to actively encourage minimisation, recycling and composting.</p>	<ul style="list-style-type: none"> <li>• Careful planning and timing of collections will be essential to minimise impacts on congestion and air quality, and also noise disturbance.</li> <li>• Measures may need to be taken to avoid abuse of communal bins, e.g. the possible introduction of access cards.</li> <li>• Introduce communal recycling bins to offer a convenient alternative to residual waste bin use.</li> </ul>
<p>Policy 6: Enforcement</p>	<ul style="list-style-type: none"> <li>• The emphasis for the enforcement team should include a strong element of communication/education rather than a more punitive approach. This has the potential of achieving better results and helping community acceptability.</li> <li>• Information on alternatives to HWRS, e.g. for recycling, should be given to ineligible users, e.g. commercial producers.</li> </ul>
<p>Policy 7: Clear and effective communication</p>	<ul style="list-style-type: none"> <li>• Consider innovative communication approaches – e.g. through letting agents and universities to new tenants.</li> <li>• Signage for recycling sites/bins is an important part of this communication, particularly with regard to visitors and transient populations. Information should be clear and simple and pictorial as well as using words to cater for all languages.</li> <li>• Consider using socio-demographic profiling such as ACORN (A Classification of Residential Neighbourhoods) to segment the population for different messages/approaches.</li> <li>• Introduce recycling at public events, perhaps with incentives, which can also have an educational role.</li> </ul>
<p>Policy 8: Trade waste</p>	<ul style="list-style-type: none"> <li>• There is an opportunity here for the Council to take a high profile lead with their own waste and recycling, and demonstrate best practice to businesses. This should include procurement of recycled products to encourage 'closed loop' recycling.</li> <li>• In addition to enforcement there is an opportunity for awareness raising/education about alternatives to general waste disposal. Business enquirers should be given information about local recycling options, and these could also be promoted more widely.</li> <li>• Reviewing business recycling services to identify and disseminate best practice.</li> <li>• Consider allowing small businesses to take waste for recycling to</li> </ul>

	HWRS for a charge to increase business recycling rates.
Policy 9: Improve service quality.	<ul style="list-style-type: none"> <li>Integrate service improvements and communication of these into wider communications campaigning.</li> </ul>

#### 4. Monitoring and next steps

Government guidance on Municipal Waste Management Strategies states that it is vital that the delivery of strategies is properly monitored and success properly evaluated. Strategies are advised to set clear indicators and targets to measure progress against, including performance indicators and sustainability indicators.

In the context of the Sustainability Appraisal monitoring provides the means to measure the ongoing performance of the MWMS against the SA objectives. A set of sustainability indicators are proposed in the SA Objectives table (Table 3 in Section 4 of the report), and it is proposed that these are used to monitor delivery of the MWMS and its social, environmental and economic effects.

This SA Report will go out for consultation together with the MWMS through a wide scale exercise involving residents and other stakeholders in the city.

