

Crawley Borough Council

Report to Overview and Scrutiny Commission

25 November 2024

Report to Cabinet

27 November 2024

Waste and Recycling Scrutiny Panel Final Report

Report of the Chair of Waste and Recycling Scrutiny Panel:
Councillor J Russell **OSC/325**

1. Purpose

- 1.1. A [Notice of Motion \(NOM\)](#) at Full Council in October 2023 proposed setting up a Scrutiny Panel to examine and seek to improve Crawley's household waste recycling rate, taking into account the differing challenges the Borough had in comparison to other areas. A Waste and Recycling Scrutiny Panel was subsequently established in February 2024 to look at how household waste recycling rates in Crawley could be improved.
- 1.2. Alongside consideration of options to improve recycling performance, the National Waste and Resources Strategy, Simpler Recycling, was launched in October 2023 and amongst other proposals, confirmed that waste collection authorities will be obliged to move to a separate weekly food waste collection with effect from April 2026. Within this context, a focus for the panel was to consider the efficacy and impact of different collection regime options open to the Council in implementing the National Waste Strategy.
- 1.3. The Panel wished to consider how to maximise impact while recognising budget constraints and the demographic and social economic context which typically influences recycling behaviour and performance. Within this context, the Panel sought to "*find ways to understand impediments to recycling in the borough and also consider ways to inform residents/customers of proposed changes to waste collection and incentivise to maximise levels of recycling*".

2. Recommendations

- 2.1. To the Overview and Scrutiny Commission:

That the Commission consider the report and decide what comments, if any, it wishes to submit to the Cabinet.

2.2. To the Cabinet:

That the Cabinet is recommended to consider the below within the context of the *Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract* exempt report (HPS/045) elsewhere on the agenda and:

- a) Re-name the current Council's website link to 'Recycling and Waste'.
- b) Request that the Cabinet Member for Environment, Sustainability and Climate Change investigate the Junior Citizen event which covers 'waste and the environment' to consider expanding this further to cover 'waste and recycling'.
- c) Recognise that, from other authorities' experience, implementing a separate food waste collection service at flats presents logistical challenges and careful consideration will need to be given to support take up and participation at these properties. In advance of this, authorise officers to explore the use of different collection methods for flats, including the use of reusable bags and/or "smart clear sacks".
- d) For the majority of households, support the continued use of a 140ltr residual waste bin and existing exceptions policy as a means of encouraging use of the separate food waste bin and recycling bins.
- e) Recognise that a rollout of two or more phases may be required to take into account varying requirements of different property types, as well as balancing available resource and the lead-in time for delivery of food waste vehicles and food waste bins.
- f) Approve that the waste and recycling service engages with residents as part of any changes to the service roll out including agreeing where bins will be sited where different options may exist for their placement.
- g) Reflecting the changes proposed in the National Waste Strategy and the potential for changes to the collection regime to significantly impact upon recycling performance, the Scrutiny Panel supports moving to the following collection arrangements and subsequently requests that Cabinet consider investigation of the options:
 - Separate weekly food waste collection
 - Fortnightly residual waste collection
- h) Approve that a clear and consistent communications campaign supports the role out of the separate food waste collection and any subsequent changes in the collection regime. As part of this messaging highlight the waste hierarchy of 'reduce, reuse and recycle' whilst ensuring that communications are easy to understand and include the message about the cost, importance of recycling to incentivise and engage residents along with contact details for bulky waste collection and fly tipping. Consideration should be given to utilising the following mediums to promote communications:
 - Wrap around signs on vehicles (as per standard approach)
 - Standard information bins ("bin hangers" as per standard approach)
 - myCrawley
 - Crawley Live
 - Early promotion in Christmas 2025 collection.
 - Council Tax billing in advance in April 2026.
 - All social media to feature notification of changes.

3. Reasons for the Recommendations

- 3.1. To investigate how household waste recycling rates in Crawley could be improved and in particular to ensure the implementation of revised collection arrangements under Simpler Recycling will help to provide a step change in recycling performance across the town.

4. Background

- 4.1. At the Full Council in October 2023, a [NOM](#) was passed requesting that the Chair of the Overview and Scrutiny Commission look into setting up a cross-party Scrutiny Panel, to look at how household waste recycling rates in Crawley can be improved.
- 4.2. The Council noted the Local Authority Waste Performance Statistics released by the Department for Environment, Food and Rural Affairs (DEFRA) in March 2023, which showed the latest available household waste recycling data for the seven District and Borough Councils within West Sussex for three years from 2019/20. This data showed Crawley having the lowest household waste percentage in West Sussex that was sent for recycling. It was noted that these figures included tonnages for garden waste. Comparisons with local authority areas with a similar urban makeup were also helpful in determining performance relative to those areas with more comparable characteristics.
- 4.3. The Panel acknowledged that the proposed changes to the collection regime which would be mandated through the National Waste Strategy would provide an opportunity for a step change in recycling performance. Within this context however, the Panel were keen to review performance under the current collection arrangements and to ensure any improvements could be taken forward. Further, the Panel were keen to consider any lessons which could be learned from other waste collection authorities which had already adopted a separate food waste collection, particularly where those authorities had a similar urban make up and a relatively higher proportion of flats and communal blocks.
- 4.4. The Panel met 4 times between February 2024 and September 2024. The Members of the Panel were: Councillors Russell (Chair), Ayling, Charatan, Lanzer and Piggott, with a change in May 2024 with Councillors Russell (Chair), Bushnell, Charatan, Jaggard, Lanzer, and Yianni. The [Scoping Framework](#) was agreed on 28 February 2024.

5. Methods of Investigation and Evidence Gathering:

Witnesses

- 5.1. The following were involved in the Review, as being the most appropriate stakeholder representatives, as identified through the Scoping Framework:
 - Nigel Sheehan (Head of Major Projects and Commercial Services – Lead Officer)
 - Paul Baker (Partnership Services Manager)
 - Ricardo (Consultants)
 - Councillor Noyce (Cabinet Member for Environment, Sustainability and Climate Change)
- 5.2. Research was documented in relation to other authorities and comparisons had been analysed across different recycling and collection regimes from other authorities and recycling in flats.

- 5.3. Desk based research was undertaken to survey other organisations and authorities. Evidence was obtained from the following reports:

[WRAP – \(Waste and Resources Action Programme\) Improving recycling in flats: rolling out the flats recycling package.](#)

[WRAP finds ‘local’ flats recycling approach can help.](#)

[WRAP Barriers to Recycling: A review of evidence since 2008.](#)

[ReLondon - Making recycling work for people in flats](#)

[ReLondon Report – Making recycling work for people in flats](#)

[Re-London Report – Recycling in flats above shops](#)

6. Findings, Actions and Supporting Recommendations

Panel Meeting 1

- 6.1. The Panel dedicated its [first meeting](#) to identifying the current processes, issues and changes to legislation as a result of Simpler Recycling.
- 6.2. The current service locally operated on a 1-2-2 service (weekly residual waste, fortnightly dry recycling, paid fortnightly subscription garden waste) with approximately 50,000 collections per week across the different material arrangements. It was noted that, nationally approximately 17% of authorities had retained a weekly residual waste collection and within West Sussex only Crawley and Arun operated this. The frequency of residual waste collection was noted as a key determinant of recycling performance and comparison with authorities who continue to operate this model was acknowledged as more significant than necessarily with geographic neighbours who have different collection arrangements.
- 6.3. The service is delivered by Biffa Municipal (10-year contract), which had been extended for 2 years until April 2026. In terms of operational performance, the Panel agreed that the service is well regarded and service standards compare favourably. The continuity of service during the Covid pandemic was acknowledged by the Panel and it was noted that staff sickness throughout the service was low compared to other authorities. Within this context, the Panel recognised the commitment to staff engagement, morale, recognition and development and it was felt there could be lessons to be learned indirectly from the positive results.
- 6.4. With regards to recycling performance, across West Sussex, the Council was performing the lowest for collecting recycling waste tonnage. However, there were significant factors and contextual issues that underpinned the performance figures. It was typical that where an authority had moved from a residual waste collection to one which was less frequent (fortnightly) this had resulted in higher recycling rates. Additionally, the recycling figures included garden waste collections, but it was acknowledged that the borough had a large number of flats relative to other districts and boroughs and consequently those collecting garden waste resulted in a greater tonnage of recycled material. Finally, it was highlighted that typically the quality of recycled material retrieved from flats was lower and more was rejected from communal blocks and flats. However, this was a national trend and not specific to the town but would be an important factor to be considered for any new collection regime.
- 6.5. The Department for Environment Food and Rural Affairs (DEFRA) launched the National Waste Strategy “Simpler Recycling” which would see some significant mandated changes to the collection regimes over the next few years. In summary changes for the Council would see:
- Standardised recycling and waste collections across the country (April 2026)
 - Residual (general, non-recyclable) waste collections to be collected (at least) fortnightly.

- Co-mingled recycling will continue to be collected on a fortnightly basis.
- A separate weekly food waste and absorbent hygiene products collection will be mandated.
- Garden waste will remain a subscription based fee-paying service.
- A separate flexible/soft plastics collection (crisp packets, cling film) will be required by March 2027.

Panel Meeting 2:

6.6. The [second meeting](#) involved attendance from consultants Ricardo to offer analysis of

(i) the council's current recycling performance compared to other authorities with similar collection regimes and

(ii) an assessment of the potential on recycling performance changes to the collection regime would achieve.

Current Recycling Performance

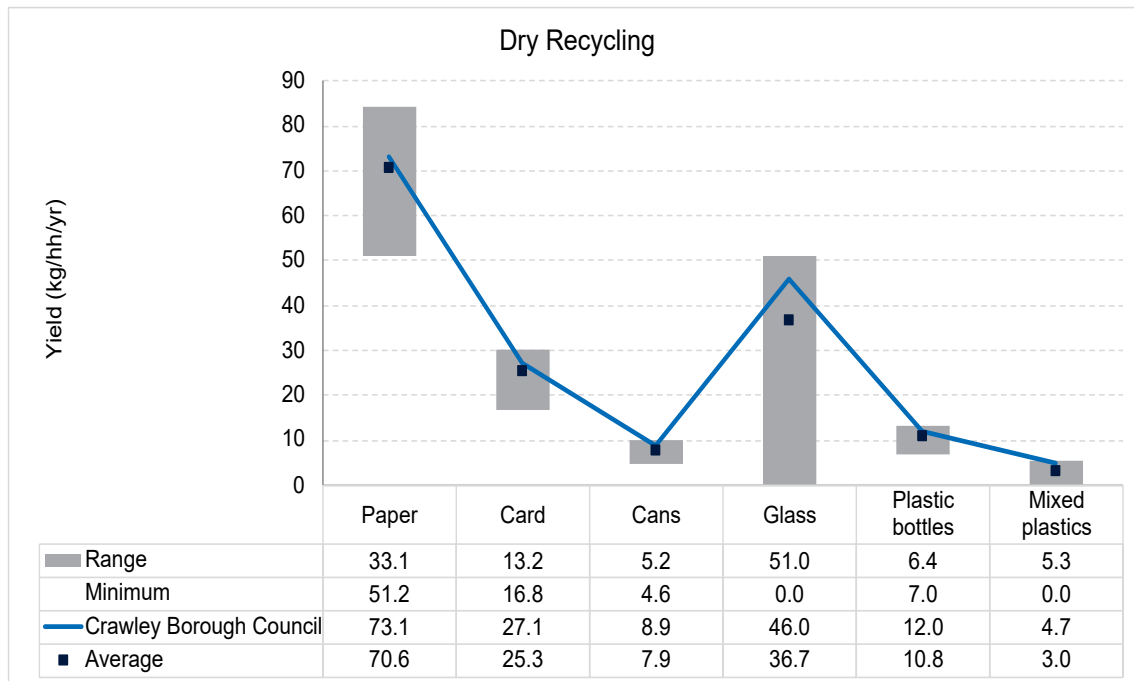
6.7. Crawley is identified as having a lower recycling rate relative to other West Sussex Districts and Boroughs. These figures do however sit within the context of a range of inherent factors which will negatively impact performance. Notably;

- A higher urban density (larger numbers of flats and smaller gardens) which will prompt lower levels of recyclable garden waste;
- As a national and countywide trend, recycling from flats and communal blocks is typically lower than from individual properties. The greater proportion of flats in Crawley will therefore typically generate a lower proportion of recycling material and higher incidence of recycling contamination.
- Of the seven waste collection authorities in West Sussex, 5 have previously moved to fortnightly residual waste collections which will tend to 'require' residents to use recycling bins as their residual waste bin becomes full.

6.8. In assessing current performance, specialist waste consultants Ricardos advised that they would typically benchmark performance with authorities which have a comparable urban make up and which have a similar collection regime. Although exact comparisons can rarely be found, Ricardos identified 13 waste collection authorities with a similar urban make up and comparable collection regime (i.e. weekly residual waste collection and fortnightly co-mingled dry recycling collection).

6.9. From the benchmark authorities, the average kilograms of residual waste per household per annum (kg/hh/pa) was 472.3kg/hh/pa. The figure for Crawley was close to the average at 478.9kg/hh/pa and significantly better than the poorest performing where 700kg/hh/pa were collected (note a lower figure for residual waste denotes better performance). It was further noted that for Crawley, 44% of material in the residual waste bin is food which presents a significant opportunity to increase recycling if and when a separate food waste collection service is introduced.

6.10. When considering performance in collecting different recycling materials, as illustrated below, Crawley performed better than the average for each material type (note the higher figure for recycling materials denotes better performance).



Assessment of Collection Regime Options

- 6.11. Utilising the baseline date for Crawley, Ricardos presented to the Panel their assessment of different collection regime options and the project impact of each on carbon emissions, recycling performance and service costs.
- 6.12. The two options presented which comply with the Simpler Recycling Statutory Guidance were:

Option 1: Weekly residual waste collection, separate weekly food waste collection, (fortnightly co-mingled recycling collection and paid for fortnightly garden waste collection are retained as is).

Option 2: Fortnightly residual waste collection, separate weekly food waste collection, (fortnightly co-mingled recycling collection and paid for fortnightly garden waste collection are retained as is).

A third option of three weekly residual waste collection, separate weekly food waste collection, (fortnightly co-mingled recycling collection and paid for fortnightly garden waste collection retained as is) was also assessed however the subsequent Simpler Recycling statutory guidance indicates this option would not be permissible.

The results of the options assessment were presented to the Panel and are in the table below.

	Projected Increase in Recycling Rate	Projected Reduction in Carbon Emissions	Projected Increase in Service Cost
Option 1 (Weekly residual / weekly food)	8.5% increase	28% reduction	£1.34m capital £1.14m per annum revenue
Option 2: (Fortnightly residual / weekly food)	10.4% increase	35% reduction	£1.25m capital £827k per annum revenue

6.13. Of the two modelled options which would be permissible under Simpler Recycling, Ricardos analysis highlighted that Option 2 (fortnightly residual waste collection and weekly food collection) would achieve a higher projected increase in recycling, a greater reduction in carbon emissions and a lower capital and revenue implementation cost. Option 2 was endorsed by the Panel as the recommended option which would therefore achieve the greatest benefit.

6.14. The following points were also noted by the Panel;

- Concern with the disposal of other items such as sanitary products/ nappies and
- Interest in schemes currently underway (for example use of “smart bags” for recycling /collection regimes) to understand lessons learned at other councils and also recycling in flats.
- The Panel were keen to explore the potential for resident engagement and communication in seeking to increase recycling, particularly where this could benefit performance from flats and communal blocks.

These points were picked up as part of the discussion in the third Panel meeting.

6.15. It was acknowledged that the packaging extended producer responsibility (EPR) was due to be implemented from January 2025, making organisations more responsible for the recovery and recycling costs of their packaging. Variable fees would also aim to encourage the use of more easily recycled materials with income derived from packaging producers used to offset the additional collection costs of introducing separate food waste. Further details for this scheme were not available over the period in which the Panel met. It was also noted that the deposit return scheme (DRS) for plastic bottles and cans was due to be implemented in 2027.

Panel Meeting 3

6.16. The [third meeting](#) focused on local intervention, Crawley implementation and incentivisation. It was key to maximise the recycling rates within the town within the confines of relevant cost. It was important for the Panel to establish similar activities councils were undertaking, particularly in the recycling output in flats. The Panel noted the importance to learn from other authorities and requested further research be undertaken with regards to their collection regimes, together with the barriers and subsequent incentivisation to recycling. Report [HPS/042](#) documented research in relation to other authorities and comparisons had been analysed across different recycling and collection regimes from other authorities and recycling in flats.

Council	Frequency of residual waste collection	Food waste	Standard size residual waste bin
Crawley Borough Council	Analyse various options which would include moving from weekly to alternate weekly when food waste introduced	No	140 litre
Chichester District Council	Alternate weekly	No	240 litre
Horsham District Council	Alternate weekly	No	140 litre
Arun District Council	Moving from weekly to alternate weekly when food waste introduced	No	Introducing 180 litre from sack service
Adur and Worthing District Council	Alternate weekly	No	140 litre

Mid Sussex District Council	Moving from alternate to three weekly	Rolling out now	240 litre
Reigate and Banstead District Council	Alternate weekly	Yes	140 litre
Mole Valley District Council	Alternate weekly	Yes	140 litre
Tandridge District Council	Alternate weekly	Yes	180 litre
Bournemouth, Christchurch and Poole Borough Council	Alternate weekly	Yes	180 litre
Ealing London Borough	Alternate weekly	Yes	180 litre
Harrow London Borough	Alternate weekly	Yes	240 litre
Croydon London Borough	Alternate weekly	Yes	180 litre
Merton London Borough	Alternate weekly	Yes	180 litre
Portsmouth City Council	Alternate weekly	Yes	140 litre

Table 1

- 6.17. Within Crawley there were 10,970 flats across 989 blocks. 3,769 flats (505 blocks) were managed by Crawley Homes. There were also around another 135 managing agents and private landlords who were responsible for the remaining flats. In addition it was thought it would be beneficial to contact and liaise with Residents' Associations for some of the flats.
- 6.18. Recycling at flats presented a number of barriers and challenges including storage space constraints within homes, the state and location of communal bin areas and confusion over what can and cannot be recycled. Blocks of flats vary considerably from the refuse disposal methods used to the communication opportunities available, meaning different approaches may be appropriate depending upon circumstance. There was an exception in determining physical space within communal blocks to provide a separate food waste collection bin and there was the potential that the current residual waste collection may continue. An audit (currently being undertaken) for each block of flats/communal area would determine the specifics, availability, options and opportunities as understanding the current environment was key.
- 6.19. Given the small percentage of local authorities nationally (15%) that had maintained a weekly residual waste collection, it was noted that documentation and research available on implementation and incentivisation would be paramount. Simpler Recycling was a national strategy and further information would be forthcoming. However, the Council worked in partnership with WSCC (as the waste disposal authority) to ensure regional communication would ensure consistency, along with that on a local level.
- 6.20. The Simpler Recycling regulations stipulated that food waste collections must be provided to all households including flats and this would be challenging given the complex nature. Previously, improvements implemented at flats were phased in the pilot in 2016. It was anticipated that households would receive two food caddies (small one for inside and the external bin). As with any change it would take a little while for residents to adapt to the new service and see the benefits if they fully recycled and separated out all of their food waste. The Panel welcomed that the roll-out may potentially again be undertaken in two or more phases depending on the varying requirements of different property types.
- 6.21. Panel Members saw the benefit of using 'smart clear sacks' for recycling material, particularly for flats. These had been successfully used in other local authorities (for example Kensington and Chelsea for both [commercial](#) premises and [residential](#)). Accepted recyclable items were printed on the sack and clearly visible.

- 6.22. The Panel observed that its scope had been to improve recycling rates within the borough and there was a strong link between the waste collection strategy and the level of recycling, (typically where an authority had moved from a residual waste collection to one which was less frequent this had resulted in higher recycling rates). Simpler Recycling was to be mandated in 2026 and the Panel supported moving to an alternate weekly collection alongside the introduction of food waste collection services. However, there were improvements that could be actioned prior (and in tandem) which would assist.
- 6.23. It was clear that a positive message regarding recycling was required in order to incentivise and encourage residents. The Panel was keen that the Council's current webpage on 'Waste and Recycling' be re-named 'Recycling and Waste', together with some rebranding (similar to other authorities). It was felt a simple title change would place recycling at the forefront but also relocate the page higher on the website and thus refocus priorities. It was important to have a simple message throughout all communications, both now and during the introduction of Simpler Recycling, that recycling makes a difference and for residents not to 'waste' their recycling. There should also be an option to signpost to tangible information for those residents that wish to receive further material.
- 6.24. Further communication and resident engagement would be paramount to ensure a successful rollout throughout each phase and this included ensuring any material was easy to access and understand. It was noted that there were programmes and schemes working with local schools and colleges to address recycling, however it was hoped the message could always be improved. It was felt it would be beneficial to investigate whether the Junior Citizen event which covered 'waste and the environment' could be expanded further to cover 'waste and recycling'.

Panel Meeting 4

- 6.25. At the [final meeting](#), the Panel reviewed the draft recommendations which drew on the findings and discussions of the previous panel meetings. The draft recommendations were confirmed however panel members were keen to ensure the correct emphasis is given to the 'reduce, reuse, recycle' waste hierarchy. Recommendation 'h' (as above) was amended to reflect this discussion and ensure this emphasis has been provided.
- 6.26. The Panel also discussed the proposed waste and recycling bin sizes and endorsed the retention of the 140ltr residual waste bin as a means of encouraging residents to utilise the food waste bin. The proposed 23litre food waste bin was also noted and Panel members agreed that the ensuring a food waste bin is not oversized would be important in encouraging residents to 'reduce' food waste in preference to recycling.

7. Implications

- 7.1. Legal Implications – The Environment Act (2021) imposes a duty on Council's to introduce a separate weekly food waste collection and to retain residual waste collections with a maximum frequency of every two weeks. These duties are scheduled to come into effect from April 2026. The Council has been discussing the implications of the revised collection arrangements with Biffa and is due to make recommendations to Cabinet regarding revisions to the service in November 2024.
- 7.2. Financial Implications – The transition to a weekly food waste collection and fortnightly residual waste collection will necessitate additional capital and revenue expenditure. The increased costs are currently being discussed with Biffa and will be presented to Cabinet as and when recommendations regarding service changes come forward. DEFRA has indicated

that capital and revenue resource funding will be made available to support Councils with their increased collection costs.

- 7.3. The capital award was confirmed in August 2024 and is set at £840K. Initial indications indicate that this will not be sufficient to cover all the capital costs which the Council will incur and further work with Biffa is currently taking place to consider how this can be mitigated.
- 7.4. The amount of revenue support funding from DEFRA has not as yet been confirmed. given the options, there will be an increase in revenue and capital that needs to be factored into account along with the need for any additional resources, both in terms of communication and engagement and the implementation of Simpler Recycling.
- 7.5. Environmental Implications – The Council’s current recycling rate is 30% (2022/23). Although this is lower than other West Sussex districts and boroughs, this rate is broadly comparable to other local authorities with a similar urban make-up and who have retained a weekly residual waste collection. A move to a fortnightly residual waste collection with a separate food waste collection has been estimated by Ricardo as facilitating an increase in the recycling rate to 40%, albeit this will be dependent upon take up and utilisation of the separate food waste bin.
- 7.6. In 2024/25, the Council is installing a fuel storage tank to support the use of Hydrotreated Vegetable Oil as a low carbon alternative to traditional diesel. The extent to which the refuse fleet is able to fully transition to HVO will be dependent upon the price differential between diesel and HVO however, this transfer has the potential to reduce carbon emissions from the refuse fleet by up to 90%, representing approximately 10% of the Council’s total carbon emissions.

8. Background Papers

- a) [DEFRA Simpler Recycling – Government Response 9.5.24](#)
- b) [ReLondon - Making recycling work for people in flats](#)
- c) [ReLondon Report – Making recycling work for people in flats](#)
- d) [Re-London Report – Recycling in flats above shops](#)
- e) [Waste and Recycling Scrutiny Panel 28.2.24](#)
- f) [Waste and Recycling Scrutiny Panel 12.6.24](#)
- g) [Waste and Recycling Scrutiny Panel 29.7.24](#)
- h) [Waste and Recycling Scrutiny Panel 17.9.24](#)
- i) [WRAP A framework for Greater Consistency in Household Recycling in England](#)
- j) [WRAP – \(Waste and Resources Action Programme\) Improving recycling in flats: rolling out the flats recycling package.](#)
- k) [WRAP finds ‘local’ flats recycling approach can help.](#)
- l) [WRAP Barriers to Recycling: A review of evidence since 2008.](#)

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