

By : Keith Ferrin : Cabinet Member for Environment, Transport and Waste
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To : Cabinet

Date : 4 December 2006

Subject : Kent Joint Municipal Waste Management Strategy

Summary

The purpose of this report is to:

- highlight the key issues related to the draft Kent Joint Municipal Waste Management Strategy (JMWMS) and its recent public consultation
 - seek support for the JMWMS and recommend its adoption by the Cabinet and County Council as one of the key partners in the Strategy.
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1. Background

The aim of Kent Joint Municipal Waste Management Strategy (JMWMS) is to provide direction for the management of Kent's municipal waste for the next 20 years. It has been developed on behalf of the Kent Waste Forum, which includes representatives from all the 2-tier local authorities in Kent. The strategy does not cover the Medway area.

2. The Headline Strategy – Key Points

The Draft Headline Strategy is attached as Appendix 1.

- The headline strategy is necessarily “broad-brush” and a number of detailed annual action plans and other documents underpin the headline strategy.
- The policies are intended to be realistic and achievable, gain “buy-in” and give overall direction of travel.
- The strategy is founded on success in slowing waste growth per household to nil by 2016. Changing attitudes and behaviour is a key outcome.
- The strategy depends on maximising use of existing facilities and services.
- The strategy informs the Waste Development Framework. The Headline Strategy identifies a forthcoming gap between the projected increase in waste tonnages and waste capacity. This is due to a projected increase in households. This means that further waste management facilities are required to address this gap and sites will be identified as part of the emerging Waste Development Framework
- The strategy does not match the proposals in the recent DEFRA consultation on the review of the National Waste Strategy which sets a target of 40% recycling by 2010/11. In this context the strategy could be considered as either “more realistic” or “not very aspirational”.

The numeric targets in the Kent Headline Strategy are:

- The Kent Waste Forum will achieve a minimum level of 40% recycling and composting by 2012/13.
- The recycling and composting performance of Household Waste Recycling Centres will be improved, reaching 60% by 2012/13.

3. Consultation Process and Next Steps

The public consultation on the Kent JMWMS has run in tandem with the Kent Waste Development Framework Consultation. Both consultations closed on the 4th October 2006.

The outcomes of the Consultation have led to amendments to the original Draft Kent JMWMS being considered for adoption by the Kent Waste Forum on the 16 November 2006. The 'Waste Strategy Consultation Report' and the 'ERM – Suggested Amendments to Kent's Draft Waste Strategy Following Public Consultation' to be submitted to the Kent Waste Forum on the 16 November 2006, have been attached as Appendix 2 and 3. The key suggested changes to the strategy are:

- Strategy Objectives

Around 50% of the respondents were happy with the three overarching objectives of the Strategy. However, a large number thought that waste reduction/minimisation should be included explicitly at this point.

Suggested amendment – 'Delivery of high quality services to the people of Kent, including an emphasis on waste reduction, recycling and diversion from landfill'.

- Policy 4 - Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours of householders.

Respondents thought that campaigns should also target children, students, businesses etc.

Suggested amendment – 'Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours of residents, consumers and the wider community'.

- Policy 7 - The KWF will lobby for measures to combat waste growth in areas such as product design and producer responsibility that are most effectively pursued at the national and international levels.

Respondents felt that 'packaging' should be mentioned explicitly to stress the need for action to be taken specifically on this component of the municipal waste stream.

Suggested amendment - The KWF will lobby for measures to combat waste growth in areas such as product design, packaging and other

producer responsibility measures, which are most effectively pursued at the national and international levels.

- Policy 8 - The KWF will achieve a level of 40% recycling and composting of household waste by 2012/13.

The majority of responses thought that this policy and target was not ambitious and not best practice. A number of responses suggested higher levels of 50%, 60% and 75% recycling & composting.

Suggested amendment - The KWF will achieve a minimum of 40% recycling and composting of household waste by 2012/13 and seek to exceed this.

4. Process for Adoption

The Final Draft will be submitted to the Kent Waste Forum on the 16th November for agreement and to Cabinet on the 4th December and onwards to full Council on the 14 December 2006. This is in parallel with submissions to all Kent district and borough councils for approval through their respective processes. This item has been included in the Kent County Council Forward Plan and will form part of this Council's Policy Framework in common with the other partners.

The Kent JMWMS informs the development of spatial options in the waste planning process.

5. Implementation Plans

The Strategy will be implemented through a number of Annual Action Plans, which will be delivered in partnership through the Kent Waste Forum. It is intended that whilst each council will retain autonomy for its own service area there will be scope for pooling of resources to develop joint initiatives across Kent.

6. Recommendation

It is recommended that the Cabinet supports the Final Draft Strategy and recommends approval by the County Council at its meeting on 14 December 2006.

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Background Documents:

- Appendix 1 - Draft Kent Joint Municipal Waste Management Headline Strategy
- Appendix 2 - Waste Strategy Consultation Report
- Appendix 3 - ERM – Suggested Amendments to Kent's Draft Waste Strategy Following Public Consultation to be agreed at the Kent Waste Forum 16 November 2006.

SUMMARY

The Kent Waste Forum (KWF) comprises all the local authorities in Kent. This is its draft Headline Strategy for the management of Kent's municipal solid waste for the next 20 years. There will be a public consultation on this draft in the summer 2006.

The key elements of the headline strategy are as follows.

- The KWF will adopt an approach which views waste as a resource, and will seek to influence other areas of public services to support this.
- The KWF authorities will seek to strengthen their joint working through a new Kent Waste Partnership with a formal joint committee, and will continue to seek the views and contributions of community and industry stakeholders.
- The authorities' principal objectives are to deliver high quality services, meet the statutory targets set for Kent, and exceed them where this is a locally agreed priority
- Waste minimisation and re-use will be a priority in order to break the link between waste production and economic growth.
- The KWF will achieve a level of 40% recycling and composting of household waste in Kent by 2012/13.
- Individual authorities will reach recycling levels above or below this figure according to their local circumstances; Kent County Council will increase recycling at Household Waste Recycling Centres to 60% by 2012/13.
- Information and education campaigns will seek to change behaviours and to increase the performance of existing recycling schemes.
- A timely procurement of treatment capacity for residual waste will ensure that Kent meets its targets for diverting biodegradable wastes from landfill; this procurement will not specify a treatment technology and will expect to have a high degree of confidence in the deliverability of the solution.

The full Joint Municipal Waste Management Strategy will be adopted in the autumn of 2006 and will comprise this Headline Strategy, background reports, and a number of Action Plans. These will be detailed proposals for the implementation of the Strategy, and will be reviewed and updated on a regular basis.

The Strategy is being prepared in parallel with the Local Development Framework for Waste. This is the planning policy document which will guide the location and scale of new waste management facilities for all wastes (household, commercial and industrial) over the next 15 years. A consultation on this framework will also be held in the summer of 2006.

1 INTRODUCTION TO DOCUMENT

This Joint Municipal Waste Management Strategy (the Strategy) has been developed by the Kent Waste Forum (KWF). The KWF partner local authorities are the Districts of Ashford, Canterbury, Dartford, Dover, Gravesham, Maidstone, Sevenoaks, Shepway, Swale, Thanet, Tonbridge & Malling, Tunbridge Wells, and Kent County Council. The KWF also includes representatives from the Environment Agency and the Association of Parish Councils.

The Strategy comprises this Headline Strategy document, together with the following supporting documents.

- Annex 1 Baseline Report for Kent
- Annex 2 How the Strategy has been developed
- Annex 3 Detailed Action Plans
- Annex 4 Waste Minimisation Options Appraisal
- Annex 5 Recycling and Composting Options Appraisal
- Annex 6 Residual Options Appraisal
- Annex 7 Weighting of Criteria Assessment
- Annex 8 Sustainability Appraisal

The purpose of the Strategy is to set out how the authorities intend to manage municipal solid waste arising over the next 20 years.

What does this Strategy cover?

This Strategy covers the waste that the partner authorities are responsible for collecting, treating and disposing. This includes waste collected from households, street sweepings, trade waste collections (where appropriate), and waste collected at Household Waste Recycling Centres (HWRCs). These are collectively called municipal solid waste (MSW).

This Strategy does not address waste generated by businesses in Kent other than where authorities arrange for its collection.

The Strategy does not concern itself with specific sites or the location of waste management facilities. Sites and related issues are being addressed through the Local Development Framework for Waste (LDF). This is being prepared by Kent County Council in parallel to this Strategy. Government policy requires the LDF to have regard to this Strategy.

How has the Strategy been developed?

The development of the Strategy was steered by the Kent Waste Forum (KWF). The process involved a series of workshops with all of the partner authorities, the development of Strategy documents, and presentations at key stages to the KWF.

Input from other stakeholders was achieved through the Kent Waste Open Forum. Wider consultation with the public, as part of the preparation of the LDF, was also taken into consideration in the preparation of the Strategy documentation. More detail of how the Strategy was developed is provided in Annex 2.

The Strategy has been subject to a Strategic Environmental Assessment (SEA), carried out in conjunction with the Sustainability Appraisal of the LDF. The outputs of the SEA are included in the Strategy documentation.

An early stage in the preparation of the Strategy was the preparation of a Baseline Report. This describes current waste management arrangements in Kent. This report is included as *Annex 1*. The principal messages from the Baseline report are outlined below.

How much MSW is generated in Kent?

In 2005/06, Kent residents produced approximately 811,000 tonnes of MSW. This is more than 1.4 tonnes per household.

The trend in recent years, consistent with experience elsewhere in the UK, has been for waste in Kent to grow year on year. This is generally understood to be a result of two factors: growth in the number of households; and increased consumption per household. However, in Kent the amount of MSW produced fell from 825,000 tonnes to approximately 811,000 tonnes in 2005/6. It is too early to say whether this fall represents an end to the period of year on year growth.

The forecast made for the purposes of the Strategy assume that waste growth per Household slows to Zero, in response to pressures for waste minimisation. However, overall MSW levels will grow in Kent due to the significant predicted growth in household numbers. Growth will be monitored closely and the Strategy reviewed as necessary. The Strategy's policies for encouraging waste minimisation are set out in *Section 4*.

Waste Minimisation

The KWF recognises the importance of waste minimisation in achieving the Strategy. There are currently several waste minimisation programmes in operation across Kent, including:

- home composting promotion;
- reusable nappies through the Changing Nappies promotion;
- Scrapstore for the reuse of waste as art and educational materials; and
- furniture reuse groups.

The Waste Minimisation Options Appraisal report provides more information on current schemes.

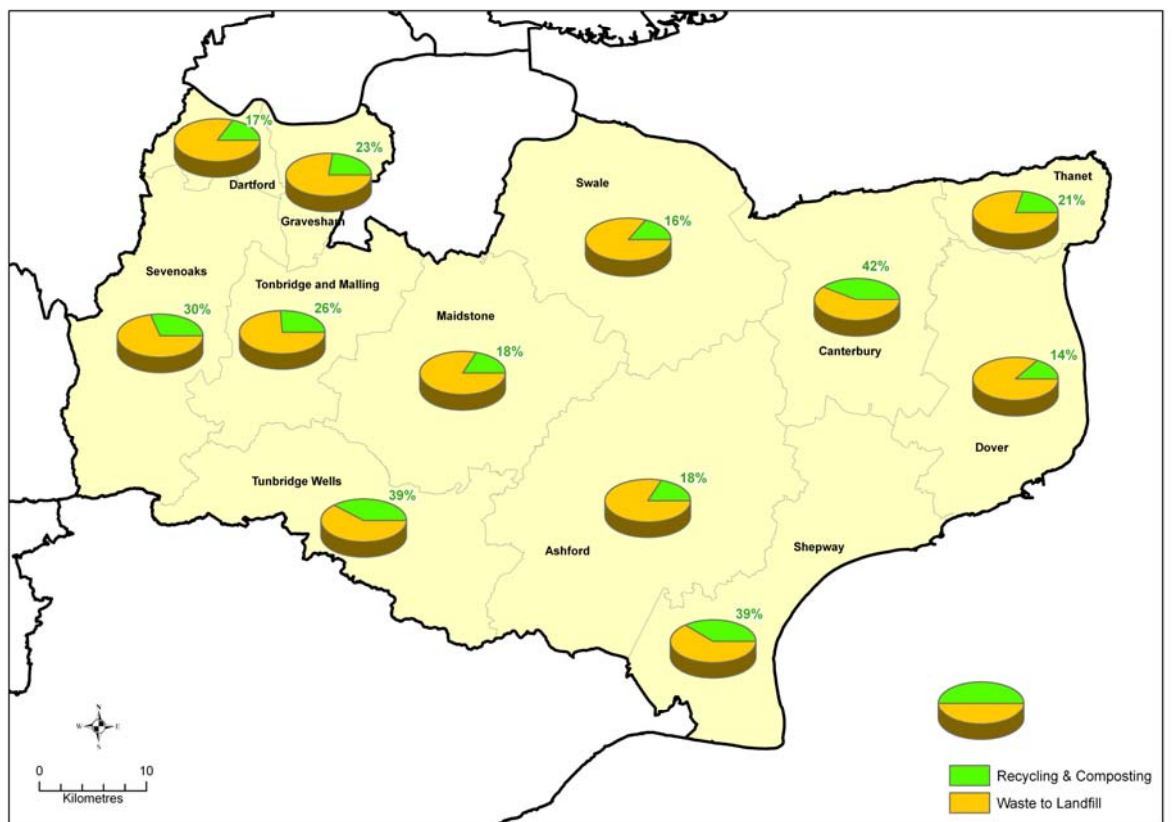
Recycling and Composting

There is a wide disparity across Kent in the recycling and composting rates achieved in each district. Each of the authorities has a statutory best value performance indicator (BVPI) targets for recycling and composting of household waste. The combined household recycling and composting rate for Kent, including material recycled at HWRCs, is currently around 29%. Current recycling and composting rates for each of the district authorities are given in the figure below.

The 18 HWRCs in Kent deliver a household waste recycling and composting rate of c.40%. Beyond this, a large proportion of soil and rubble deposited at the sites is also diverted for re-use, but does not contribute to the BVPI recycling rate.

As part of the KWF's commitment to recycling and composting, the Allington Waste Management Facility will incorporate a Materials Recovery Facility (MRF) to sort commingled recycling materials collected from Kent Districts.

*Recycling and Composting Rates in Kent 2005/6**



* Subject to Audit

Recovery

Beyond recycling and composting, recovery is the capture of value from residual waste, usually in the form of energy. The Allington Waste Management Facility will include an Energy from Waste (EfW) plant due to come on stream in late 2006. Kent County Council has agreed a long term contract with the operators, Kent Enviropower, to recover energy from 349,000 tonnes of waste a year. The facility will generate approximately 40 Mwh⁻¹ hours of electricity.

Disposal

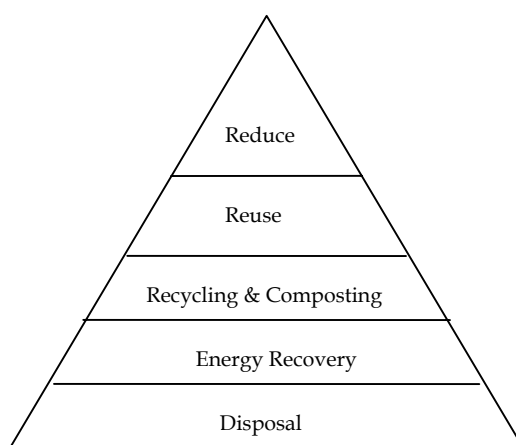
Currently Kent is sending approximately 552,000 tonnes per year of MSW to landfill. This amounts to 64% of Kent's MSW. This is not sustainable environmentally and will be restricted under the landfill directive. Government policy views waste as a resource to be put to good use; disposal should be seen as an option of last resort.

3 KEY REASONS FOR CHANGE

Kent's existing waste strategy dates from November 2002. There are a number of key reasons why the Strategy needs to be updated. These are outlined below.

Sustainable waste management: the government's national sustainable development strategy, published in 2005, identifies the way we produce, consume and waste resources as an increasing burden and stress on resources and environmental systems.

The direction of waste policy: national and regional waste policy envisages a closer fit between actual practice and the waste hierarchy (see below ⁽¹⁾), and in particular, a greater focus on waste reduction and re-use and delivery of higher levels of recycling and composting than was previously envisaged. Government has also provided new guidance on the development of Joint Municipal Waste Management Strategies.



Recycling and composting targets: statutory best value performance indicator targets (BVPIs) for recycling and composting household waste have been set for all authorities. Further targets for future years are to be finalised, consistent with national policy.

Diversion from landfill: the Landfill Directive sets the UK targets for the diversion of biodegradable municipal waste from landfill. In England, waste disposal authorities, of which Kent County Council is one, have been allocated annual permits for the disposal of biodegradable municipal waste to landfill that reduce year on year to 2020.

(1) Taken from: Department of the Environment, Transport and the Regions. Changes to Decision Making Principles in Waste Strategy 2000. (2004)

The KWF’s principal objectives in managing MSW in Kent are to:

- deliver high quality services
- meet the statutory targets set for Kent, and exceed them in areas where this is a locally agreed priority
- support, where possible, other related policy aims of the Kent authorities (e.g. regeneration)

In order to deliver the Strategy the KWF will:

- engage householders so that they understand the need for, and participate fully in, waste reduction and recycling and composting initiatives
- be responsive to the needs of the community
- ensure deliverability by influencing Kent’s Local Development Framework for Waste (LDF) and the Regional Spatial Strategy (RSS)
- secure sufficient funding to implement the Strategy

Choices regarding the detailed implementation of the Strategy should favour solutions that are deliverable, cost effective, environmentally sound and socially beneficial.

Strategy Policies

This section sets out the policies formulated for the purposes of delivery of the Strategy. A separate document sets out Action Plans which detail how the Strategy objectives and policies will be implemented.

RESOURCE MANAGEMENT

The word “waste” implies something that we do not want, and that we intend to discard. However, wastes have an inherent value because of the materials they contain and the energy they embody. Disposal of waste represents a loss of materials and energy from the economy, and means that they are replaced with new raw materials and energy demand. The KWF recognises that, where practicable, consumption of resources should be reduced and product and material life extended. The KWF views waste itself as a resource. Seeking to maximise the recovery of resources from “waste” is consistent with the national principles of sustainable development and the waste hierarchy, and underpins this Strategy.

Waste management processes, and the transport of wastes or separated materials, consume materials and energy. Where practicable, this should be minimised. Where wastes are produced, as much value as possible should be recovered, and secondary materials and energy employed locally. The development of markets in Kent will deliver a management system for resources that approaches a closed loop. The KWF recognise that to develop this to the full, a resource-focused approach will need to reach into areas such as public procurement, planning policy, economic development and regeneration.

Policy 1 - The KWF will encourage the conservation of resources through the use in Kent of materials and energy recovered from wastes produced in Kent. It will aim to influence other areas of public policy and service delivery to support this agenda.

PARTNERSHIP

In parallel with the development of this strategy, the local authorities have considered how best to work together to implement it. They have reviewed their current informal arrangements and resolved in principle to establish a new Kent Waste Partnership. This will consist of a Joint Waste Management Committee for Kent supported by an advisory committee of Chief / Senior Officers. It is anticipated that this will be confirmed later in 2006, when a constitution for the joint committee is approved. A wider Kent Waste Forum body will support the work of the Kent Waste Partnership, through consultation and debate involving stakeholders from the Community, Voluntary and Industrial sectors.

The Kent Waste Partnership's purpose will be to deliver the implementation of the Strategy and provide a platform for joint working in the areas of best practice, delivering efficiencies, information exchange and the evaluation and monitoring of services.

Policy 2 - To deliver the Strategy, the County, District and Borough Councils will work towards a new Kent Waste Partnership with a formal joint committee structure; they will actively seek the views of stakeholders, and their contribution to achieving the strategy's objectives.

EDUCATION & ENGAGEMENT

Community engagement and education regarding waste issues is essential. Delivery of the Strategy relies on every stakeholder and householder in Kent taking responsibility for the waste they produce, and requires change in the attitudes and behaviour of waste producers in Kent. Changes in society and our current ways of living and working can create barriers to participation. The services provided in Kent must be adaptable to local circumstances to ensure that participation and engagement in waste management initiatives are maximised wherever opportunities arise.

Policy 3 - All stakeholders, including elected Members, will be kept informed and consulted on waste management issues affecting Strategy implementation.

Policy 4 - Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours of householders.

There is a thriving and committed Community and Social Enterprise Sector in Kent, operating at the local level and offering a range of waste management services. There is considerable potential for these services to be expanded in order to contribute to the delivery of the Strategy. Nevertheless, historically there have been obstacles that have hindered this expansion. These barriers should be removed and opportunities for the Sector to compete for contracts where it can deliver cost-effective and sustainable services should be identified.

Policy 5 - The authorities will work jointly and individually to encourage the Community and Social Enterprise Sector to reach its full potential in delivering cost-effective and sustainable waste management services.

WASTE MINIMISATION & RE- USE

Waste minimisation and reuse is at the top of the waste hierarchy and a priority for the KWF. By minimising the amount of waste we produce and reusing materials, the cost of waste

management and the demand on finite global resources will reduce. Over the next 20 years there are approximately 80,000 new homes planned to be built in Kent. Because of this, the overall amount of waste managed in Kent is expected to grow. It is therefore even more essential that the waste produced by each household is reduced. The waste minimisation and reuse options appraisal report analyses (Annex 4) assesses the impact of a number of minimisation and reuse initiatives including home composting and furniture reuse programmes.

Policy 6 - Waste minimisation and re-use will be prioritised and the KWF will seek through its wider policy aims to break the link between waste production and economic growth.

Policy 7 - The KWF will lobby for measures to combat waste growth in areas such as product design and producer responsibility that are most effectively pursued at the national and international levels.

RECYCLING AND COMPOSTING

Currently, almost 30% of waste produced by households in Kent is separated through kerbside collection, household waste recycling centres (HWRCs) and bring bank facilities for recycling or composting. The KWF plans to increase this level in diverting more waste away from landfill.

Current levels of recycling vary considerably across the County, due largely to varying priorities and statutory obligations placed on each of the authorities. The Strategy goes beyond the current statutory targets, and commits the KWF to working together towards a pooled recycling and composting target for Kent for 2012/13. Further targets will be considered when the Strategy is reviewed.

The Strategy target is challenging. However, with increased investment and engagement, the KWF believes that it has the mechanisms for ensuring that it is deliverable. The KWF considers that the target should be genuinely attainable rather than merely aspirational. The Strategy's aspiration is to achieve the target early, and to exceed it in later years, where this is consistent with broader objectives. Achieving the target demands joint working to identify, to implement and to maintain schemes that yield the best results for Kent as a whole, supporting authorities whatever their current levels of operation.

Policy 8 - The KWF will achieve a level of 40% recycling and composting of household waste by 2012/13.

Policy 9 - The KWF authorities will work together to develop, to maintain and to improve schemes that secure the best recycling and composting performance for Kent as a whole.

The recycling and composting options appraisal undertaken in developing the Strategy will inform the authorities in enhancing their existing recycling and composting services. Many services currently provided are not used to their maximum potential. The KWF will improve the efficiency of these schemes through increasing rates of householder participation and material capture.

Policy 10 - The KWF will secure higher rates of performance from existing services through education and awareness-raising.

Policy 11 - The KWF will strive to make waste and recycling accessible and easy to use for all householders, across all housing types and sectors of the community.

Beyond their ambitions for waste reduction through home composting, some of the authorities are seeking to divert additional biodegradable municipal waste from landfill through collection of garden and/or kitchen waste for composting. An in-vessel compost facility is planned in west Kent to treat this material. For the authorities in the east of the County, appropriate infrastructure will be required to fulfil their composting ambitions.

Policy 12 - The KWF will work to secure composting capacity including in-vessel in the County to enable the authorities in the east of Kent to provide an efficient and cost-effective service for managing compostable wastes.

Wastes deposited for recycling and composting at the 18 HWRCs in Kent contribute significantly to the total amount of material collected. Currently, the sites achieve a household waste recycling and composting rate of c.40%. In addition, a large proportion of soil and rubble deposited at the sites is also diverted for re-use, but does not contribute to the household waste recycling rate. The potential of these sites for further diversion will be realised by enhancing separation activities through changes to site design and infrastructure, incentivising contractors and working together towards continuous improvement. This will move the emphasis of the sites away from disposal towards recycling and composting.

Policy 13 - The recycling and composting performance of HWRCs will be improved, reaching 60% by 2012/13, while maintaining high standards of customer service.

RESIDUAL WASTE MANAGEMENT SERVICES

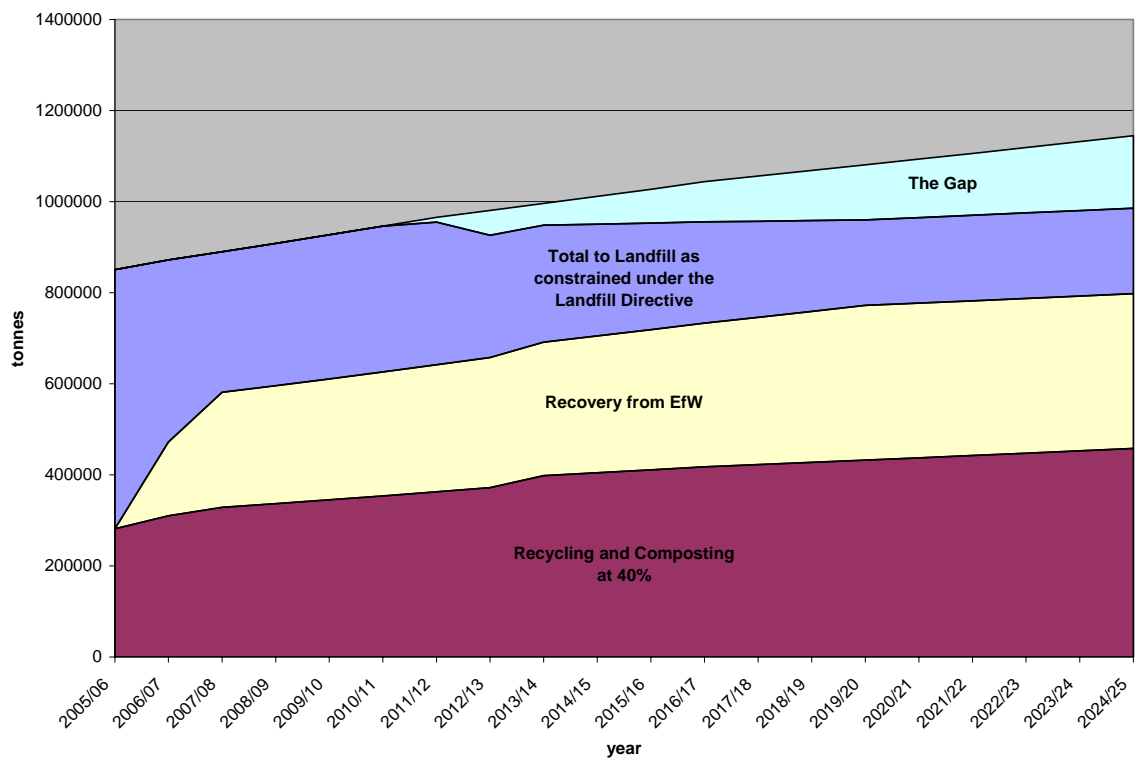
Recovery

The Strategy's expectations for recycling and composting alone will be insufficient to meet the future statutory targets to divert biodegradable municipal waste from landfill. Capacity must also be provided at recovery facilities in order to meet the targets. Contracted capacity at the Allington EfW facility, due to become operational in 2006, meets Kent's needs in the short-term.

The projections on which the Strategy is based identify a need for additional recovery beyond 2010/11, which increases over time as waste arisings grow, and diversion targets become more demanding. Monitoring and review of the Strategy will trigger the procurement of additional capacity if these projections are borne out. Careful consideration of the lead time for new facilities will be required.

Policy 14 - A timely procurement programme will be implemented to provide sufficient capacity for Kent to continue to meet its statutory targets for the diversion of biodegradable municipal waste.

The contribution of EfW at Allington, and the further recovery gap, is shown below.



Monitoring and review of the need for additional capacity will inform the scale of facilities sought in any procurement. There may be opportunities for achieving economies of scale through co-management with commercial, agricultural and other wastes with similar characteristics to MSW. However, the Strategy seeks to avoid the import of waste into Kent for recovery and disposal.

Policy 15 - The procurement programme for additional capacity will take account of the opportunities for co-management with other waste streams, but will discourage facilities of a scale that will attract imports of waste to the County.

The residual waste options appraisal undertaken as part of the development of the strategy and provided in *Annex 6*, has indicated that there is a balance of advantages and disadvantages between the recovery technologies available and the number and scale of facilities. This will be used to help guide procurement. Landfill diversion targets have to be met and thus any technology proposed to help meet these needs to be deliverable and reliable. In the procurement of additional capacity, no specific technology or scale of facility is favoured.

Policy 16 - Procurement of additional capacity will keep technical options open and flexible in terms of the number and scale of facilities to be provided but will need to emphasise deliverability.

The performance of recycling and composting collections, and the contribution of Allington, provide Kent with a surplus of permits for the landfill of biodegradable municipal waste in the short-term. Policy 12 will ensure that this situation continues in the medium- and long-term. The government has introduced a trading system which allows obligated authorities to buy and sell permits in meeting their targets. Kent County Council will seek to trade its surplus permits to the advantage of service delivery in the County.

Policy 17 - Kent County Council will take a pragmatic approach to trading landfill allowances, being willing to trade, but not reliant on trading for compliance or essential income.

Disposal

Compliant with statutory targets, a proportion of Kent's MSW will continue to be landfilled once the Allington facility is operational. Landfill capacity in Kent is in short supply, and will continue to be required for the disposal of residual wastes in the long-term. Constraints on landfill capacity may make other treatment routes more attractive for the proportion of MSW that the County could continue to landfill after meeting its statutory obligations.

Policy 18 - Kent will procure landfill capacity to meet the need for the disposal of residual waste for which recovery capacity is not contracted.

Policy 19 - Where it is cost-effective, Kent will exceed its statutory targets for diversion of biodegradable municipal waste from landfill in order to preserve landfill void space in the County.

Waste Transfer Facilities

The waste transfer station network will be improved to facilitate transport of materials to the recycling, composting, treatment, recovery and disposal infrastructure provided across the County. The transfer station network will deliver reduced environmental impacts, cost-effective and efficient transport, and efficiencies for collection services. Acceptance of non-municipal waste streams at transfer facilities will be explored where there is a positive business case to be made.

Policy 20 - The transfer station network will be improved across Kent to promote the efficient transport of wastes for treatment, recovery and disposal.

Action Plans: the accompanying Action Plans are an integral part of the Strategy. They provide detail on the specific initiatives and decision points that will implement the Strategy, particularly in the short-term, together with responsibilities and timescales. Further detail will be placed in the Action Plans as further choices are made by the KWF and individual authorities on service provision beyond the current planning horizon. Action Plans will be monitored and revised as the Strategy is implemented in order to respond to changing circumstances and to maintain a focus on the next phase of delivering new waste management services.

Strategy Action Plans will be monitored and revised annually in response to changing circumstances in order to focus on the next phase of service delivery

Engagement: delivery of the Strategy's objectives is predicated on the greater involvement of householders and businesses in Kent in addressing the issues that mean we must change how we manage waste. Without commitment and participation, limiting or reversing waste growth, and achieving higher levels of source separation for recycling and composting, will be compromised. If the Strategy's ambitions in these areas are undermined, the costs of waste management will increase and further capacity for residual waste treatment and disposal will need to be procured as the 'gap' grows (see page 9).

Extensive and effective awareness-raising and communication will recruit a high proportion of householders to participate in the authorities' waste reduction and source separation initiatives.

Infrastructure Development: implementation of the Strategy will require new infrastructure to be delivered in Kent. Provision of adequate sites for the wastes to be managed in Kent will be made through the Regional Spatial Strategy (RSS) and the LDF. Government policy is that this Strategy should be a material consideration in the development of both. The KWF will seek to ensure that sufficient regard is given to the capacity requirements of the Strategy and to demands made by non waste-related development.

The KWF will seek to ensure that the provisions of the RSS and the LDF are sufficient to enable the delivery of the Strategy.

Partnership: the Strategy has been developed through partnership working between the authorities, and is adopted by them all. Delivery of the Strategy will require that the authorities continue to work together in order most efficiently to meet its objectives. The principle of working together towards joint goals does not compromise subsidiarity: the authorities have different responsibilities and mandates that they must fulfil. However, in making service level choices, the authorities will consider objectives for Kent as a whole, and, in particular, reduction of the overall impact on the Council Tax payer.

The KWF will work together to achieve the objectives of this Strategy and are committed to sharing equitably the costs and rewards of delivery.

Monitoring & Review: the Strategy will be monitored for compliance with government policy and guidance and to ensure that it is current and relevant in the light of changing circumstances. The Strategy will be subject to public consultation as part of the wider consultation on the LDF, and consideration will be given to any changes necessary in the light of comments received. The Strategy will be subject to a comprehensive review and revision no later than 2010/11.

The Strategy will be monitored to ensure its currency and relevancy, and will be revised no later than 2010/11.

Kent Joint Municipal Waste Management Strategy Consultation

Summary of responses

Produced by Dialogue by Design, independent facilitators of the online consultation for Kent Waste Forum

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Summary of responses

Introduction and background

The Kent Joint Municipal Waste Management Strategy (KJMWMS) is a strategy that sets policy and overall targets for the collection and recycling of household waste in Kent. It has been developed by the Kent Waste Forum, which is made up of the County Council, all the Districts, the Kent Association of Parish Councils and the Environment Agency.

Dialogue by Design has been working with the Kent Waste Forum (KWF) to deliver the consultation process.

Purpose of this document

This report summarises the responses to the online consultation during Stage 1.

The purpose of this summary is to illustrate the range of ideas and opinions contained in the responses received from 1133 participants to the 10 questions. The KWF will use all the comments made to inform the next stage in the process.

The Consultation Arrangements and Process

The Draft Strategy was the result of extensive dialogue with stakeholders over 15 months. All partner authorities at officer and councillor level helped to develop the Draft Strategy. Other important stakeholders were able to influence the contents of the Draft Strategy through the KWF. The public consultation from July to October represented a further opportunity for key stakeholders to provide their views, and for the public to consider the draft policies that their elected representatives had constructed on their behalf.

The formal consultation period was ten weeks. It was designed to allow for discussion and debate at local level over an extended period. Kent Waste Partnership websites arranged for details of the consultation to be made widely available from 26 July through to the closing date of 4 October.

Over 2,000 organisations (including parish councils) and individuals were sent letters on 25 July 2006 advising details of the consultation and inviting their contributions. The KWF partners worked together to ensure the public received information about the consultation and could take part. This included posters and 30,000 leaflets in civic buildings, detailed copies of the Draft Strategy in libraries and main council buildings, and the co-ordination of website information across partners.

Newspaper coverage was also undertaken throughout the consultation period (see Summary Table). Media information and requests were handled by DTW Vavasour, a specialist independent consultancy, throughout the consultation with the aim of raising debate about the issues and encouraging contributions.

A help line and e-mail contact was available to assist anyone with other special needs throughout the process. Details of the consultation exercise and instructions on participating were also available via the Kent County Council Website. In addition, the County Council aimed to deal with all enquiries it received concerning the consultation in an effective manner.

Table: Waste Consultation - Summary of Media Coverage
(Source: DTW Vavasour)

Date of article	Newspaper/media	Consultation details	Kent waste policy	Treatment facilities	Landfill sites	Recycling options
27.07.2006	www.kentonline.co.uk	✓	✓	✓		
30.07.2006	www.news.bbc.co.uk			✓		
02.08.2006	www.news.bbc.co.uk	✓				
03.08.2006	Dover Mercury	✓		✓		✓
03.08.2006	East Kent Mercury	✓		✓		✓
03.08.2006	Folkestone Herald	✓		✓		✓
03.08.2006	Kentish Express			✓		
04.08.2006	Isle of Thanet Gazette	✓		✓		
04.08.2006	Isle of Thanet Gazette			✓		✓
10.08.2006	Folkestone Herald			✓		✓
10.08.2006	Folkestone Herald			✓		
10.08.2006	Dover Mercury			✓		
10.08.2006	Dover Mercury	✓		✓		
10.08.2006	East Kent Mercury	✓		✓		
10.08.2006	Herne Bay Gazette	✓		✓		
10.08.2006	Kentish Gazette	✓		✓		
10.08.2006	Whitstable Gazette	✓		✓		
11.08.2006	Isle of Thanet Gazette			✓		
13.08.2006	Kent on Sunday	✓		✓	✓	
20.08.2006	Kent on Sunday			✓		
25.08.2006	Isle of Thanet Gazette			✓		
27.08.2006	Kent on Sunday			✓		✓
31.08.2006	Dover Express	✓		✓		
31.08.2006	Dover Express			✓		
31.08.2006	East Kent Mercury	✓		✓		
31.08.2006	East Kent Mercury			✓		
03.09.2006	www.bbc.co.uk			✓		
07.09.2006	East Kent Mercury	✓		✓		✓
14.09.2006	East Kent Mercury			✓		
14.09.2006	East Kent Mercury	✓		✓		
14.09.2006	Dover Mercury			✓		
14.09.2006	Dover Express	✓		✓		
14.09.2006	Dover Express			✓		
21.09.2006	East Kent Mercury	✓		✓		
28.09.2006	East Kent Mercury	✓	✓	✓		

Several events were organised for key stakeholders throughout the consultation. These included all elected representatives in the county that wished to take part, including an event specifically for parish councillors.

People wanting to comment could:

- Register and participate online
- Request paper versions of the documents be sent to them and return emailed or paper responses via a Freepost address

Participants who participated online logged on to a website with usernames and passwords generated at the time of registration. On the website they could read background information about the consultation, its objectives and how the results will be used, and ground rules for participating in the process.

Participants could then read the documents on screen or download and print them and respond to questions contained in the documents. Responses were recorded in boxes limited to 2,000 characters (about 400 words).

At the end of the session the responses to each question were collated and grouped under appropriate headings by independent facilitators. This summary has been prepared by one of the independent facilitators.

Format of summary

There were ten questions inviting comment on a number of areas. Each question is listed along with some background information in bold type under the relevant section. This is followed by a table which lists the groups that have been created for each question, along with the number of comments that have been placed into each group. Please note that where a comment refers to more than one issue it will have been placed in more than one group. For each question a small number of comments have been selected to illustrate the types of comments received. These example comments are in italics. It must be emphasised that reading this summary is not a substitute for reading all of the responses, available at <http://www.kentwaste.dialoguebydesign.net>

It is also important to remember that this is a qualitative consultation, not an opinion poll: its primary purpose is to identify key issues relating to the Strategy and inform any revisions. This consultation was open to anyone who wanted to participate and is consequently, not statistically representative. Care must be exercised, therefore, in attributing any significance to the number of responses placed in each group.

Results

General comments on the submissions

1133 people submitted comments, of these:

- Approximately 306 people submitted their comments using the online system;
- About 81 people's comments were manually inputted onto the online system as they submitted their comments to the consultation by either email or letter; and
- A further 746 people commented using a similar format agreeing with either Lympne Parish Council's response or Whitfield Parish Council's response.

Some of the submissions, received by email or letter, exceeded the character length as they had a series of attachments. Where this is the case, a note has been made within the submission text about the type of attachment included in their submission.

A series of comments were also received late but have not been included in this summary. As at the 20 October 2006, the total number of late submissions was 85.

Section 1: Principle Objectives

The Kent Waste Forum's principal objectives in managing Municipal Waste Strategy in Kent are to:

- **deliver high quality services;**
- **meet the statutory targets set for Kent, and exceed them in areas where this is a locally agreed priority;**
- **support, where possible, other related policy aims of the Kent authorities (e.g. regeneration).**

Question 1: What are your views of the Strategy's three main objectives? Are these the top three objectives that you would choose? If not, what alternatives would you suggest?

There were a total of 1050 submissions to this question. Many of these submissions were from people agreeing with the response made by Lympne Parish Council, Whitfield Parish Council and Sandwich Town Council. It should be noted that the full submission from organisations such as these may well have addressed more than one question. However, the submissions supporting these organisation's responses may only appear in the first question.

81 of the respondents supported the objectives, 23 comments supported them but with suggestions for additions. In particular, 27 people wished to see a stronger emphasis on recycling. 21 comments specifically said they would like the objectives to be stronger or clearer. 29 comments expressed concern about the objectives or suggested alternative objectives.

... Maximum effort should also be put on recycling of waste and ensuring that waste that is produced should be processed by more sustainable and less polluting methods such as large-scale composting and anaerobic digestion.

...we can see little problem with recycling or composting facilities in these areas if they are of appropriate scale. You should be trying to exceed statutory targets and be a leader in waste strategy.

The objectives could be more ambitious and decisive e.g. surely it would be good to aim for targets to be exceeded in all areas rather than just where it is a locally agreed priority.

I agree these are the top priorities but I would question the locally agreed priority to exceed the statutory targets. The statutory targets should be the minimum requirement and all local areas should strive to exceed them as normal course of waste management & strategy not just meet the target.

Group Heading	Number of Comments
Add objective - customer satisfaction	1
Add objective - explain options	1
Add objective - cleanliness	1
Add objective - consultation and communication	4
Add objective - economics	2
Add objective - education	1
Add objective - environmental	4
Add objective - promote reduction	4
Add objective - sustainability	2
Add objective - minimise transport of waste	3
Challenge objective 1	10
Challenge objective 2	16
Challenge objective 3	11
Comments about delivering high quality services	3
Comments about frequency of collection	3
Comments about implementation	2
Comments on the consultation	4
Need to include all waste	2
No comment	4
Objectives need to be stronger or clearer	21
Objectives should emphasise statutory targets	1
Objectives should focus on education	3
Objectives should focus on minimisation	8
Objectives should include quality of life	1
Objectives should prioritise recycling	27
Objectives should relate to finance	1
Oppose specific sites	5
Suggest alternative objectives	29
Suggest alternative site	1
<i>Support Lympne Parish Council Response</i>	<i>469</i>
Support objectives	81
<i>Support SAGE Response</i>	<i>35</i>
<i>Support Sandwich Town Council Response</i>	<i>46</i>
<i>Support Thanet Friends of the Earth Response</i>	<i>11</i>
<i>Support the response of FoE</i>	<i>1</i>
<i>Support the views of CPRE</i>	<i>1</i>
<i>Support the views of Tilmanstone Parish Council</i>	<i>2</i>
<i>Support Whitfield Parish Council Response</i>	<i>283</i>

Section 2: Resource Management

The word "waste" implies something that we do not want, and that we intend to discard. However, wastes have an inherent value because of the materials they contain and the energy they embody. Disposal of waste represents a loss of materials and energy from the economy, and means that they are replaced with new raw materials and energy demand. The KWF recognises that, where practicable, consumption of resources should be reduced and product and material life extended. The KWF views waste itself as a resource. Seeking to maximise the recovery of resources from "waste" is consistent with the national principles of sustainable development and the waste hierarchy, and underpins this Strategy.

Question 2: What importance do you think should be placed on seeing 'waste as a resource'? What actions would you like to see from Kent's councils in support of your views?

199 people commented on this section of which 89 supported the view that waste is a resource. There was a split of 20 comments considering energy produced from waste is a resource and 24 comments stating that waste should not be used as a resource for energy production. 94 respondents supported more recycling and composting as part of viewing waste as a resource. The importance of education, especially in increasing recycling was raised by 21 people.

The importance of "waste as a resource" is undeniable and should be taken into careful consideration throughout the Kent resource management. Kent's councils should promote the concept of waste as a resource and place particular emphasis on recycling.

Exceptionally important. It would be inexcusable to waste energy produced from recycling waste. Linking the energy from waste recycling with power generation is important.

Waste is not just a resource, and shouldn't be viewed as such. Much better to re-cycle and re-cycle again and again. The idea of just burning it once to gain a very small amount of energy and potentially pollute the surrounding area is not a very sensible option.

Greater Recycling Facilities. Currently, Kent's District Council's are recycling different materials within each District. Why? As they are all monitored by the County Council why the differences.

It is very important that more people become aware of waste as a resource. Not enough is being told to people. Everyone needs educating on it. It starts in schools. More being advertised on it.

Group Heading	Number of Comments
Collection of data	2
Comments on the consultation	2
Consider economic costs	6
Consider energy from waste a resource	20
Consider energy or environmental balance	10
Consider sustainable procurement	1
Increase education and communication	21
Limited resource potential	2
Make good use of existing facilities	2
Need more consultation	2

Group Heading	Number of Comments
No comments	2
Not a resource for energy production	24
Prioritise waste minimisation	21
Priority is to remove waste	2
Refer to other question	2
Support more recycling and composting	94
<i>Support the view of Thanet FoE</i>	1
<i>Support the views of SAGE</i>	1
<i>Support the views of Sandwich Town Council</i>	6
Support view that waste is a resource	89

Section 3: Education & Engagement

Community engagement and education regarding waste issues is essential. Delivery of the Strategy relies on every stakeholder and householder in Kent taking responsibility for the waste they produce, and requires change in the attitudes and behaviour of waste producers in Kent.

Question 3: What campaigns and/or incentives would encourage more re-use and recycling in Kent?

205 responses were received for this section. 108 people feel that education and public awareness are important in encouraging re-use and recycling in Kent. Many respondents were advocates of the carrot and stick approach with 56 comments on using financial incentives, 16 comments about prizes and awards and 27 comments making reference to penalties and disincentives.

Making the process simpler was also seen to be important to encouraging re-use and recycling;

- 22 comments were made about making recycling more user friendly;
- 42 comments were made specifically about improving doorstep recycling;
- 22 comments were made about the equipment and bins provided for recycling;
- 27 comments were made about improving local facilities; and
- 19 comments were made about the segregation of different waste streams.

11 people raised partnership working with 26 comments specifically commenting on engaging with retailers/ manufacturers.

1. *Education. Children educate parents. Aim not just at junior level but at the whole school age range. Emphasize the causes and effects of the waste problem and how they can contribute to the solutions. This should be a topic for debate in the 6th form and be included in 6th form conferences.*
2. *Run competitions for the best examples of reuse for schools and for adults.*
3. *As this is such an important issue that affects everyone it should be kept at the forefront of the public's awareness in as many different ways as possible. Posters, competitions, local radio and press, campaign buses and advertisements etc, should be used.*

....Incentive schemes must be put in place. It could be a reduction in council tax for the better recyclers. And if this is not enough, sanction households which repeatedly disregard recycling.

Most people can be engaged if you make it easy for them to segregate their waste. The implementation of paper/metal waste in Sevenoaks was exceptionally positive. You got it right here, by making it easy for us to help you. However we need to look in more detail at

the components of the average bin... we still have to dispose of bottles ourselves at bottle banks and there is no fabric or cardboard collection. Plastics too for most food packaging about from liquids isn't yet collected....

Wheelie bins make life so much easier for put out each week than to have to carry large black bags full of heavy rubbish, particularly for those who are elderly or have disabilities.

There needs to be understanding that this is a two way process. Councils need to inform the public on how to recycle & keep them continually informed on roll-outs, successes etc. In turn the public needs to provide feedback on schemes put in place. Most importantly Councils need to listen and respond to public comment – the public is not necessarily trying to be awkward; sometimes schemes are complicated and hard to use....

Like many others in Kent I have children and feel it would be beneficial to all to encourage schools and businesses to work together and improve their waste too, places like McDonalds should have a recycling bin for their happy meal boxes as they are cardboard, and if people were to lobby them on this I feel that children would take an interest in their environment too.

Group Heading	Number of Comments
All plastic should be biodegradable	1
Better solutions for businesses	4
Central government role	4
Comments on consultation	3
Community exchanges / free recycling	5
Composting and compost bins	9
Compulsory recycling	5
Consistent policy	2
Education and public awareness	108
Engage with retailers / manufacturers	26
Engage with the community	9
Ensure adequate funding / resources	5
Financial incentives	56
Improve doorstep recycling	42
Improve local environment to engender civic pride	2
Improve local facilities	27
Improve quality / status of personnel	3
Issues around monitoring of recycling	8
Issues around regularity of collection	13
League tables	3
Legislation	4
Make collection / equipment free	13
More user-friendly recycling	22
Nappy scheme	2
NGO schemes and information	2
No comment	2
Partnership working	11
Penalties / disincentives	27
Prizes / awards / competitions	16

Group Heading	Number of Comments
Provide plastics recycling facilities	4
Refer to other question	6
Reject policies that discourage recycling	2
Responsibility lies with KCC	12
Return schemes for bottles etc	11
Segregation of different waste streams	19
Support SAGE Response	1
Support Sandwich Town Council response	3
Threat of incinerators / landfill	2
Use external consultant	1
Use money from composting	3
Waste receptacles and equipment	22

Involvement of the Community

There is a thriving and committed Community and Social Enterprise Sector in Kent, operating at the local level and offering a range of waste management services. There is considerable potential for these services to be expanded in order to contribute to the delivery of the Strategy.

Question 4: What roles do you think the community and social enterprise sector could play in dealing with household waste?

160 people responded to this question. Education and improving public awareness was raised by 59 people. 25 people felt that some sort of incentive or applying social pressure could act as an encouragement for better recycling. 21 comments made reference to improving facilities and services with many ideas given. 36 comments were made about having sufficient, especially local, schemes for recycling, reuse and collection to support improved household waste management. 22 comments addressed the issue of local authorities requiring adequate support or funding to assist them in their role.

Awareness programmes to inform local communities of the options for household waste and recycling, composting for them to then filter on to their neighbours/friends etc.

Reward parishes for high recycling take up, encourages communities to get involved...

Clearly the sector could expand the range and frequency of collections. It could also play a role in encouraging responsible behaviour, by a providing an example and a form of social pressure

Community and Social enterprise sectors are in general driven from the ground up and as such tend to be effective in motivating groups and individuals than top down policies. Community and Social Enterprise should be actively encouraged as an effective means of delivering household waste management policies, particularly if those groups are able to make a real and meaningful contributions to the formulation of policies.

Significant role if given the opportunity - for example WyeCycle in Ashford shows how a community business can thrive around using waste as a resource. Alongside reducing, reusing and recycling waste, the enterprise also organises local veg box schemes and a farmers market which supports the local economy; showing how all these issues are interlinked. There needs to be much more support from councils for local initiatives like this.

Group Heading	Number of Comments
Comments on council tax incentives	3
Comments on incineration	2
Comments on markets and competition	9
Comments on the consultation	2
Composting schemes	2
Do not understand question / definition	11
Education and public awareness	59
Engage with business	2
Engage with local councils	2
Focus on plastics and packaging	4
Important role / more involvement	17
Important role but unrealistic	1
Incentives, encouragement & social pressure	25
Include commercial / industrial waste	2
KCC role	12
Lead by example	3
Less talk, more action	1
Limited / no role	9
Link to improved facilities and services	21
Link to national policy	1
Monitoring / reporting	8
Need for funding / support	22
Need for long-term paradigm shift	1
Not sure / no comment	10
Partnerships and community engagement	12
Pressure on retailers / manufacturers	4
Question not relevant	3
R&D work	1
Refer to other question	8
Reuse / recycling / collection schemes	36
<i>Support Sandwich Town Council response</i>	3

Section 4: Waste Minimisation & Reuse

Waste minimisation and reuse is at the top of the waste hierarchy and a priority for the KWF. By minimising the amount of waste we produce and reusing materials, the cost of waste management and the demand on finite global resources will reduce.

Question 5: What practical measures could councils, residents and businesses do to reduce waste produced in Kent?

202 people responded to this question. 48 comments made reference to measures to increase recycling, many about making facilities more local and providing different bins for different materials. 25 people discussed the need to use penalties and/ or incentive packages. 47 comments specifically objected to the amount of packaging sold with goods, especially in supermarkets and 21 people felt that involving supermarkets and other retailers is important.

Be aware of what we are buying i.e packaging on products etc, and recycle as much as possible. As before councils could provide different bins for different materials.

Expansion of doorstep recycling, perhaps coupled with incentives or fines or both and pressure on producers to reduce unnecessary packaging.

How easy is this one!!! Produce less packaging. Produce less printed waste (remember the paper-free society the computer was meant to herald?). Businesses could stop selling things in plastic bottles and go back to glass bottles with refills. Residents could try buying less in the first place! Councils could try and ensure recycling banks are in suitable places and are emptied more often. But really, the main one is for businesses to PRODUCE LESS PACKAGING.

Councils need to collect more recycling from households. Other counties have glass and plastic collections as well as paper. More recycling sites could be set up. It could be that those companies who are involved in creating household waste e.g. supermarkets are forced to provide recycling facilities for the waste they ultimately generate... Businesses need to lead by example. I'm sure that the pub near me doesn't recycle as there are always blue waste bags that are full of recyclable glass in their bins...

Group Heading	Number of Comments
Alternatives to using new plastic bags	11
Be realistic about waste collection	4
Better information provision	18
Comments on consultation process	4
Comments on specific sites	1
Compostable/recyclable packaging	10
Encourage composting	13
Home incineration	1
Implement waste minimisation & green procurement	16
Kerbside/doorstep collection	10
Make recycling a condition of licensing	5
Measures to increase recycling	48
Measures to increase re-use	20
National policy initiatives required	4
No comment	9
Packaging and hygiene	2
Penalties and incentives	25
Recycling/managing business waste	11
Reduce consumerism	6
Reduce junk mail	9
Reduce packaging	47
Reduce regional growth	2
Research best practice elsewhere	6
Support local producers	8
<i>Support Sandwich Town Council Response</i>	3
Waste separation	13
What supermarkets/other retailers can do	21

Section 5: Recycling & Composting

Currently, almost 30% of waste produced by households in Kent is separated through kerbside collection, household waste recycling centres (HWRCs) and bring bank facilities for recycling or composting. Many services currently provided are not used to their maximum potential. The KWF will improve the efficiency of these schemes through increasing rates of householder participation and material capture.

Question 6: What do you think are the reasons why many residents do not use current recycling services to their full potential? What could be done to put that right?

249 people responded to this question. Many of the comments gave a general recommendation to improve recycling rates. 30 comments identified that there were difficulties in getting to recycling facilities and a further 30 comments generally spoke about the current situation. A number of other comments also acknowledged a need to increase the understanding about waste and make recycling easier.

The extent of recycling facilities varies greatly across the county; some districts collect everything including plastic whilst other areas don't even provide a full service with many houses having no kerbside collection. The way in which collections operate also has an impact i.e. boxes seem to be more effective than bags, different colours for green waste etc. Recycling needs to be made as easy as possible and this includes good communication about collection dates etc.

Logistical problems cause many issues, How do I transport my waste (smelly, wet, dirty) to my local facility, in my 2 seater Porche, push bike, commercial vehicle? How far do I have to go to deliver my waste, is there any other reason I would be travelling to this location. I am 80 and I can't lift the waste. There are lots of reasons why people don't use the current facilities. Recycling and re-use needs to be accessible and convenient for all households; which tends to entail roadside collection.

...recommendations for reducing waste:

- kerbside bottle recycling
- coloured boxes supplied to householders for different
- Encourage more commercial operators to recycle office paper and boxes
- Green waste to be collected weekly
- Charge for garden waste bins to be abolished
- Supermarkets be encouraged to have bins for surplus packaging to be discarded
- More information be available on what items can be put in clear recycling bags — perhaps printed on the sacks
- Supermarket bags be taxed

...Solutions

1. Education. Explain the importance of recycling and show how it is done in leaflets, articles and displays.
2. Send householders more detailed information on what can be recycled and update this as more things are added to the list.
3. Target areas where there is the least recycling to give advice.
4. Put bins for recyclables such as cans and packaging in streets, in parks and at events.

Group Headings	Number of Comments
Comment on consultation process	3
Comment on current situation	30
Confusion about what is recyclable, where and when	24
Difficulties in getting to recycling facilities	30
General recommendations to improve recycling rates	71
Kerbside collections need boosting	16
Lack of consistent methods	7
Lack of incentives/penalties	15
Lack of storage space	10
Lack of understanding	7
Making recycling easy	26
Making recycling facilities more user-friendly	23
Need for a reduction in product packaging	14
Need to combat apathy and idleness	29
Need to increase understanding of waste issues	28
No comment	4
Problems experienced by older people	5
Problems with bins, boxes and refuse collectors	14
Recycling not a priority	9
Scepticism that things are recycled	7
Separating waste	7
Support Sandwich Town Council Response	3

Question 7: If you wanted to have an aspirational recycling and composting target higher than the achievable target of 40% set for 2012/13, what target would you suggest? What levels of increased investment and commitment would you be willing to give to achieve this?

170 submissions were made to this question. The majority of comments identified the target of 60% as achievable. A number of people also expressed concern in terms of the environmental and economic costs associated with achieving the targets.

In my household we are already recycling as much as we can but we cannot do better except by stopping buying product in plastic packages sold in most of the supermarkets. I reckon we could achieve a target of 60% recycling

I feel that the targets need to be revised as it appears that some areas have a very low target. I understand that by 2012/3 Ashford will have a larger population and 18% will be more than 18% now - however, why not make all areas in line - everyone has to be 40%, those already at 40% well done and see if you can get to 60% etc. Also, the KCC HWRC leads to some confusion - it distorts the real recycling figures for given areas. In Shepway cardboard is collected kerbside and is therefore included in recycling. However, in Dover we have to take cardboard to a KCC site or place it in the normal bin collection - it is therefore not included in the Dover recycling figure and will come under the KCC HWRC figure instead. How is this fair to the people of Dover who make an effort to recycle when it is reflected in the KCC figure and not Dover, to then be told that Dover is only at 14%?

An accurate cost estimate to society should be given to carbon emissions, particularly the toxic effects of incineration, such as healthcare costs, loss of non-renewable material,

greenhouse warming etc. This should then be included in the budget for waste removal and recycling. I believe it would then become apparent that it is more economic, holistically, to recycle. The problem with localised budgets is that they encourage the bad practice of shifting the economic burden of unpleasant and costly tasks so that they become "someone else's problem"... if true costs were publicised, including the cost of NOT recycling, I believe that most "ordinary" people would be willing to bear it, whatever it was.

Group Headings	Number of Comments
100%	8
45%	2
50%	24
55%	2
60%	31
65%	3
70%	16
75%	14
80% plus	3
90% plus	4
Cannot comment	11
Comment on the consultation	2
Consider costs - £ and environmental	9
Needs to be in the context of facilities	1
Question ability to achieve 40%	3
Refer to other question	1
Set target for waste reduction	1
Should be comparable with Europe	4
Suggested target not enough	7
Support more recycling and composting	7
Support suggested target	7
<i>Support the views of Sandwich Town Council</i>	3
This should not be a priority	2
Use EFRA Committee targets	6
Use more appropriate language	1

Improvements at the HWRCs

Wastes deposited for recycling and composting at the 18 HWRCs in Kent contribute significantly to the total amount of material collected. Currently, the sites achieve a household waste recycling and composting rate of c.40%.

Question 8: What improvements do you think could be made at the HWRCs to recycle and compost more and to help meet the target of 60% set for 2012/13?

160 responses were received for this section. Responses were quite varied and focussed on the actual collection services and also allowing more waste streams to be recycled. Making the HWRCs more accessible and user friendly as well as extending their opening hours was also a frequent comment made.

If you watch most people at the HWRC's they are the committed ones and they are really quite distressed when told to put most things into general household waste. From my observations I would say that recycling wood would eliminate a large element of the waste currently dumped in 'general'. Maybe if we could purchase, or even have delivered - different coloured sacks for different types of waste products, we would learn to distinguish recycling by colour coding. Polythene, paper, foil, metal etc., then at least when we are clearing spaces we could sack up in the right colours and it would make it easy to unload. A similar scheme might also work for street collections?

Improve access. Provide a collection service for those without transport. Overall, if collection of recyclable waste was improved to cover plastics, cardboard, fabrics etc. then there would be shorter queues at the centres at weekends and less fuel wasted by those vehicles queuing to get in!

...Many residents cannot travel to their nearest HWRC. Therefore kerbside collections need to be more efficient. A green neighbour scheme should be adopted by residents, to adopt a vulnerable neighbour, or one that doesn't own transport to reach the HWRC, and take the neighbour's waste as well as their own. This could also increase kerbside recycling when good neighbours provide advice on materials that can be recycled. Enable people to use their HWRCs to increase the amount of deposits made.

Make sure that sites are open for longer and not for just one evening a week summertime only. Also make sure that the sites are easier to use and not congested with traffic. Many people avoid the sites as they are dangerous and difficult to use at peak times.

Group Heading	Number of Comments
Allow larger vehicles	9
Allow more commercial / industrial waste	10
Allow more waste streams to be recycled	26
Comments on 60% target	15
Comments on collection services	31
Comments on site location	9
Comments on the consultation	3
Develop re-use options	18
Improve composting facilities	12
Improve lay-out	6
Improve on-site information	7
Improve safety / security	2
Improve segregation / sorting	13
Increase education / public awareness	12
Increase funding	1
Increase multi-party engagement	1
Longer opening hours	19
Look at technical innovation	2
Monitoring and targets	4
More / better staff	15
More / better waste receptacles	8
More / bigger HWRCs	14
More accessible and user friendly	25
More small, local facilities	7

Group Heading	Number of Comments
No improvements needed at HWRCs	2
Not sure / no comment	11
Positive feedback on existing sites	9
Reduce queues at sites	6
Refer to other question	13
Rewards / incentives	4
Sell products at site	6
Share good practice between sites / regions	2
<i>Support Sandwich Town Council Response</i>	3
Tackle packaging first	2

Section 6: Residual Waste Management Services

The Strategy's expectations for recycling and composting alone will be insufficient to meet the future statutory targets to divert biodegradable municipal waste from landfill. Capacity must also be provided at recovery facilities in order to meet the targets. Contracted capacity at the Allington EfW facility, due to become operational in 2006, meets Kent's needs in the short-term.

The projections on which the Strategy is based identify a need for additional recovery beyond 2010/11, which increases over time as waste arisings grow, and diversion targets become more demanding.

Question 9: What are your views on the approach taken for long term planning for residual waste treatment and landfill capacity in Kent?

168 people responded to this question. 39 comments recommended a focus on reduce, re-use and recycling be taken for long term planning, 28 comments opposed the use of energy from waste or recovery facilities and 21 opposed landfill, air fill or land raise. A number of people also commented on the use of Allington in the future.

In the past it has been very short sighted with all overspill going out of county. Allington fulfils the requirements for now so this should give planners the time to look to see if waste levels will drop or if another facility is required. If another facility is required maybe it would be good to look at alternative technologies. Landfill capacity will always be required in some respects as some wastes will not be accepted for incineration and by its nature incineration requires landfill to dispose of its ash wastes. The ideal would be for Allington to take up all the slack and for any further requirements to be met by increased recycling and composting. Many campaigners against incineration believe this to be possible. Maybe we have to listen to what they have to say.

I struggle with this one. The more material that can be recycled the less needs to be dumped into landfill sites or incinerated. If there is likely to be a difficulty in using all the reusable material produced by an major increase in recycling levels then some special research needs to be undertaken to resolve this problem - again, looking at the success of other countries in this respect.

Where it may be realistic to assume a growth in arisings is it really realistic to accept that such a growth is inevitable. A concerted programme of waste reduction at source will remove pressure from diversion targets.

The impression is that with the increase in population, there will be an increase in waste production. If attempts to minimise waste now were undertaken, there should not ideally be a

need for greater waste capacities in the future as householders and businesses would have reduced their own waste. That we generate mountains of rubbish is a sad fact and disposing of it creates problems for the environment. A lot of time and energy have been spent on this Development Framework, assessing the best methods of minimising the effects of transportation on the environment, the cost in labour and finding the best locations for landfill sites. Perhaps we need to start by rejecting the idea that waste mountains are inevitable and campaign vigorously to reduce them now.

Group Headings	Number of Comments
Ambiguous over trading with others	2
Comments on Allington	20
Comments on commercial drivers	5
Comments on Dungeness	1
Comments on finance / resources	5
Comments on the consultation	6
Concerns over lack of long term approach	10
Concerns over specific waste streams	2
Concerns over speed of implementation	4
Concerns over targets / achievability	7
Consider housing / population issues	11
Criticism of Permit system	1
Education and public awareness	11
Engage with central government	2
Engage with supply chain	4
Focus on localised solutions	14
Focus on reduce / re-use / recycling	39
Improve collection services	7
Learn from others	5
Look into new / innovative technologies	17
Make better use of existing facilities	6
No comment / not sure	13
Oppose EfW / recovery facilities	28
Oppose landfill / airfill / land raise	21
Oppose overall approach	14
Oppose trading with other counties / countries	11
Refer to other question	2
Site location issues	10
Specific disposal suggestions	2
Support EfW / recovery facilities	17
Support land reclamation	1
Support landfill / airfill / land raise	7
Support new EFL facilities	1
Support overall approach	14
<i>Support Sandwich Town Council response</i>	3
Support trading with other counties / countries	2

Section 7: Additional Views on the Draft Waste Strategy

Question 10: Do you have any further comments on the draft Strategy?

161 responses were made to this question. Most presented specific comments on the Strategy and a number of comments were made on the publicity, access and format of the consultation.

As a public consultation, this is far too complex and lengthy to appeal to the ordinary mortal! I recycle as much as I can. The public is hampered in not understanding what and how to manage their waste efficiently. Education is key.

Use every form of publicity to get the public on your side. We have to make everyone aware that we are all in this together. This is our planet and we have to be responsible with the resources... If we get people to work together across all ages 5 upwards we will get there. We (all of us schools councils businesses) have to train our children and grandchildren to be responsible citizens.

Whilst appreciating the complexity of the demands of moving large quantities of waste around places on councils, surely it would be better to focus on reducing waste in the first place?

The strategy does not in my view make sufficient reference to the economic aspects of waste management and the cost of it to each household Council Tax payer. Ideals and fine ideas frequently come from governments at all levels. However, it is the man in the street who will have to pay the cost of waste disposal, his own and his community's. No mention is made of the levels of charge for waste and no attempt made to introduce consideration of cost as an absolute item, nor of cost/benefit analysis; nor of the value of proper, clean and wholesome waste management. In today's very mercenary society these issues should be addressed.

Whilst of course we would wish to recycle/reuse as much as possible, we believe that there must be both an economic and an environmental 'hierarchy value of waste'. We would wish to encourage research that can show (on average) whether more effort should be placed on recycling say glass than say paper, etc. This is because clearly, if Council resources are stretched, then they should make certain that the most economically valuable waste products are recycled. A similar exercise should be done regarding environmental values. This would be more difficult because what values can be placed on environmental impacts, but very clearly it might be more important to save forests (from where most inputs to paper manufacture comes), rather than say sands (from which glass is made). So, the Council needs to establish a 'waste hierarchy', one that is able to be manipulated over time to match changing economic and environmental parameters, and one that provides an indication as to where its waste priorities should lie.

We have an opportunity to develop a rational, sustainable and deliverable waste strategy that if it includes high recycling rates may even be supported by the public; we cannot allow this opportunity to slip by. Currently we have a host of non burn technologies available to us and a clear desire on the part of stakeholders, as was demonstrated at last years Waste and Minerals stakeholder meeting hosted by KCC, to develop a network of smaller facilities better able to respond to local need. If we move towards incineration or other methods of thermal treatment we are likely to stifle other emergent technologies. We feel the need for stronger guidance from KCC, at present it would appear that some Districts can opt out of taking responsibility for their own waste in the hope that will be disposed of in somebody else's backyard, this is not acceptable, a high recycling rate needs to be set and Districts

compelled to achieve it for the benefit of us all. Whilst KCC has, without a great deal of success, flirted with emerging technologies, we would urge serious consideration be given to proven non burn technologies offered by companies with a demonstrable track record. Many of the problems we face at present are due to a failure to understand the need for best practice to be adopted, the information is out there, not always in the hands of so called Beacon Councils, and the community sector often has many examples of best practice at its finger tips. For the public to support any KCC plan or strategy the public need to feel involved, sadly this consultation process has not helped, there have been too many gaps and oversights, too little actual information/consultation. A paradigm shift in Officer attitude is required if this strategy is to be supported and a need to be more holistic and sustainable if it is to be a success.

Group Heading	Number of Comments
Comments on facilities and services	9
Comments on specific sites	3
Concerns over accuracy of figures	2
Deadline for responses too early	2
Further engagement / education	9
General and specific comments	45
General criticism	17
General support	12
Language / content of consultation	10
Learn from other counties or countries	4
Need joined up thinking	3
No further comments	18
Publicity / access / format of consultation	25
Questions	5
Refer to other question	3
Speed / effectiveness of implementation	1
<i>Support Sandwich Town Council response</i>	4
Use of bio-degradable materials	2

1 **SUGGESTED AMMENDMENTS TO KENT'S DRAFT WASTE STRATEGY FOLLOWING PUBLIC CONSULTATION TO BE AGREEED AT THE KENT WASTE FORUM ON THE 16 NOVMEMBER 2006**

1.1 **INTRODUCTION**

The draft Headline Strategy for Kent (the Strategy) underwent public consultation between 19th July and 4th October 2006. The results of this consultation have been coordinated by the consultants Dialogue by Design (DbyD).

ERM have reviewed all the responses received as a result of the consultation process, including comments given at the Kent Waste Open Forum in September. Their objective has been to ensure that all relevant recommendations and points of concern are duly considered when drafting the final version of the Strategy.

This report identifies the key areas for your consideration in revising the draft Strategy.

DbyD are producing for the Partnership a report summarising the number and type of responses received in the consultation. Consequently, these issues are not covered by this report.

There were also a number of generic comments put forward in the consultation (both positive and negative) that do not have a direct impact on the wording of the Strategy at this stage and that are not included in this report. However, these comments may be relevant for consideration during the implementation of the Strategy and are included in the DbyD report.

The consultation also produced some specific suggestions for how the Strategy should be delivered. These are being are being considered for inclusion in the Action Plans.

The Kent Waste Partnership reviewed proposed amendments at a meeting on 2nd November and now put these forward to the Kent Waste Forum for formal agreement.

1.2 **COMMENTS ON STRATEGY OBJECTIVES**

Concerns raised

Around 50% of the respondents were happy with the three overarching objectives of the Strategy. However, a large number of respondents (as well as a number of delegates at the Kent Open Forum) thought that waste reduction/minimisation should be included explicitly at this point.

Respondents also felt that the objective ‘*to deliver high quality services*’ was rather vague, and that high quality services should be delivered as a matter of course.

Points to Consider

Throughout the development of the Strategy, the importance of ‘*delivery of high quality services*’ has been stressed continually at both officer and Member level. In reality, some authorities in England do not offer high quality services, and we consider that this is valid as a ‘strategic’ aim. It would only be appropriate to include waste minimisation as a strategy objective if there is commitment across the Forum to implement actions to deliver this. Nevertheless, there is value in stressing that, in delivering high quality services, there will be an emphasis on driving waste management up the waste hierarchy

Suggested Amendment

- Delivery of high quality services to the people of Kent, including an emphasis on waste reduction, recycling and diversion from landfill.

1.3 COMMENTS ON SPECIFIC POLICIES

1.3.1 Policy 4

Policy 4 - Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours of householders.

Concern raised

Consultees thought that focusing the policy on changing the behaviour of *householders* may not emphasise sufficiently clearly the fact that campaigns should also target children, students, businesses etc.

Points to Consider

Throughout the development of this Strategy, the KWP and KWF were clear that they needed a challenging, achievable Strategy rather than one that was purely aspirational.

A higher recycling and composting target should only be included in the Strategy if there is commitment from the Partnership to deliver the services required to achieve this. The authorities’ choices have been clear throughout the strategy development process, and we do not believe that a higher target is justifiable as anything other than an aspiration at this stage.

Suggested Amendment

Revised Policy 4 - Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours **of residents, consumers and the wider community.**

1.3.2

Policy 7

Policy 7 - The KWF will lobby for measures to combat waste growth in areas such as product design and producer responsibility that are most effectively pursued at the national and international levels.

Concerns raised

The issue of reducing the amount of packaging and lobbying Government and supermarkets was raised strongly in the consultation feedback. People were therefore generally supportive of Policy 7. However, it was felt that 'packaging' should be mentioned explicitly to stress the need for action to be taken specifically on this component of the municipal waste stream.

Suggested Amendment

Revised Policy 7 - The KWF will lobby for measures to combat waste growth in areas such as **product design, packaging and other producer responsibility measures**, which are most effectively pursued at the national and international levels.

It is also essential that a method for implementing this policy is included in the Strategy Education Action Plan.

1.3.3

Policy 8

Policy 8 - The KWF will achieve a level of 40% recycling and composting of household waste by 2012/13.

Concerns raised

The majority of responses thought that this policy and target was not ambitious and not best practice. A number of responses suggested higher levels of 50%, 60% and 75% recycling & composting.

Points to Consider

Throughout the development of this Strategy, the KWP and KWF were clear that they needed a challenging, achievable Strategy rather than one that was purely aspirational.

The method used so far in developing the 40% target is robust. If a higher target, say of 50%, was to be adopted, this would need to be backed by a justification that showed why this level is appropriate, given the appraisal carried out. The strategy would also need to show how such a level would be delivered and how this would impact on the residual waste options.

A higher recycling and composting target should only be included in the Strategy if there is commitment from the Partnership to deliver the services required to achieve this. The authorities' choices have been clear throughout the strategy development process, and we do not believe that a higher target is justifiable as anything other than an aspiration at this stage.

Suggested Amendments

<p><i>Revised Policy 8</i> - The KWF will achieve a minimum of 40% recycling and composting of household waste by 2012/13 and seek to exceed this.</p>
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