

# Public Document Pack

Democratic Services



## ENVIRONMENT COMMITTEE

Tuesday 13 June 2023 at 7.45 pm

Place: Council Chamber, Epsom Town Hall

Online access to this meeting is available on YouTube: [Link to online broadcast](#)

The members listed below are summoned to attend the Environment Committee meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Councillor John Beckett (Chair)  
Councillor Liz Frost (Vice-Chair)  
Councillor Arthur Abdulin  
Councillor Anthony Froud

Councillor Steven McCormick  
Councillor Julie Morris  
Councillor Kieran Persand  
Councillor Kim Spickett

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sing'.

Chief Executive

For further information, please contact [democraticservices@epsom-ewell.gov.uk](mailto:democraticservices@epsom-ewell.gov.uk) or tel: 01372 732000

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- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building, but move to the assembly point at Dullshot Green and await further instructions; and
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## Exclusion of the Press and the Public

There are no matters scheduled to be discussed at this meeting that would appear to disclose confidential or exempt information under the provisions Schedule 12A of the Local Government (Access to Information) Act 1985. Should any such matters arise during the course of discussion of the below items or should the Chair agree to discuss any other such matters on the grounds of urgency, the Committee may wish to resolve to exclude the press and public by virtue of the private nature of the business to be transacted.

## Questions and statements from the Public

Up to 30 minutes will be set aside for questions and statements from members of the public at meetings of this Committee. Any member of the public who lives, works, attends an educational establishment or owns or leases land in the Borough may ask a question or make a statement on matters within the Terms of Reference of the Committee.

All questions must consist of one question only and cannot consist of multiple parts. Questions and statements cannot relate to planning or licensing committees matters, the personal affairs of an individual, or a matter which is exempt from disclosure or confidential under the Local Government Act 1972. Questions which in the view of the Chair are defamatory, offensive, vexatious or frivolous will not be accepted. Each question or statement will be limited to 3 minutes in length.

If you wish to ask a question or make a statement at a meeting of this Committee, please contact Democratic Services at: [Democraticservices@epsom-ewell.gov.uk](mailto:Democraticservices@epsom-ewell.gov.uk)

Questions must be received in writing by Democratic Services by noon on the third working day before the day of the meeting. For this meeting this is **Noon, 8 June**.

A summary of statements must be received by Democratic Services by noon on the day before the day of the meeting. For this meeting this is **Noon, 12 June**.

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## **AGENDA**

### **1. QUESTION AND STATEMENTS FROM THE PUBLIC**

To take any questions or statements from members of the Public.

### **2. DECLARATIONS OF INTEREST**

Members are asked to declare the existence and nature of any Disclosable Pecuniary Interests in respect of any item of business to be considered at the meeting.

### **3. MINUTES OF THE PREVIOUS MEETING (Pages 5 - 8)**

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 21 March 2023 (attached) and to authorise the Chair to sign them.

### **4. SURREY ENVIRONMENT PARTNERSHIP - SEP2025 (Pages 9 - 42)**

The Surrey Environment Partnership (SEP) has generated a high-level approach document on county-wide waste management for the period 2023 – 2025, which it has called SEP2025.

This report requests that the Committee reviews and endorses SEP2025 on behalf of the Council.

### **5. TENNIS IN THE BOROUGH (Pages 43 - 54)**

This proposal is about modernising the way parks' tennis courts are operated and presents a clear opportunity for the Council to optimise the impact and value of its existing assets to benefit residents, both users and non-users, supported by the Lawn Tennis Association

### **6. FORMATION OF ALLOTMENT WORKING GROUP (Pages 55 - 60)**

This report seeks approval to form of an Allotment Working Group and proposes a draft Terms of Reference for comment.

### **7. FOOD SAFETY SERVICE AND HEALTH AND SAFETY INTERVENTION PLANS (Pages 61 - 92)**

In compliance with national monitoring arrangements, this report sets out how the Council intends to discharge its statutory responsibilities in respect of food hygiene and health and safety interventions in the year 2023-2024 and reports on activities in the previous years.

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**Minutes of the Meeting of the ENVIRONMENT AND SAFE COMMUNITIES  
COMMITTEE held at the Council Chamber, Epsom Town Hall on 21 March 2023**

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**PRESENT -**

Councillor John Beckett (Chair); Councillors Monica Coleman, Chris Frost, Rob Geleit, Steven McCormick, Julie Morris and Humphrey Reynolds

Absent: Councillor Arthur Abdulin, Councillor Steve Bridger and Councillor Lucie McIntyre

Officers present: Justin Turvey (Interim Head of Place Development), Mark Rachwal (Environment and Sustainability Officer), Samantha Whitehead (Streetcare Manager), Brendan Bradley (Head of Finance) and Dan Clackson (Democratic Services Officer)

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**24 ELECTION OF MEMBER TO PRESIDE AS VICE-CHAIR**

In the absence from the meeting of Councillor Arthur Abdulin (Vice-Chair), the Committee elected to appoint Councillor Chris Frost to preside as Vice-Chair of the meeting.

**25 QUESTION TIME**

No questions were received from members of the public.

**26 DECLARATIONS OF INTEREST**

No declarations of any Disclosable Pecuniary Interests were made by Members in respect of any item of business to be considered at the meeting.

**27 MINUTES OF THE PREVIOUS MEETING**

The Committee confirmed as a true record the Minutes of the Meeting of the Committee held on 24 January 2023 and authorised the Chair to sign them.

**28 TREE MANAGEMENT PLAN**

The Committee received a report presenting the Council Tree Management Plan and seeking support for its adoption.

The Committee considered the following matters:

- a) The Committee considered that the Tree Management Plan (as seen at appendix 1 of the report) ought to include further information with regard to legislation in relation to tree management in the interest of robustness and clarity. It was remarked that the Tree Management Plan contained grammatical and spelling errors that required correction.
- b) The Environment and Sustainability Officer explained that a number of the amendments to the Plan had been informed by a 'tracked-changes' document provided by the Tree Advisory Board in response to the consultation. He explained that there were a number of comments received relating to development and planning processes, and these comments had been passed onto the planning policy team for consideration.
- c) The Committee and the Chair agreed that the Plan should be brought to future meetings of the Committee for yearly review.

Councillor Steven McCormick proposed that an additional recommendation be added asking the Committee to agree that the Tree Management Plan be reviewed and revised to ensure the absence of grammatical and spelling errors and to include further information with regard to legislation in relation to tree management, and that any revisions be reviewed and approved by the Chair and Vice-Chair of the Committee.

The Committee unanimously agreed to the addition of the proposed recommendation.

Following consideration, the Committee unanimously resolved to:

- (1) Agree to adopt the Tree Management Plan set out in Appendix 1 of the report.**
- (2) Agree that the Tree Management Plan set out in Appendix 1 of the report be reviewed and revised to ensure the absence of grammatical and spelling errors and to include further information with regard to legislation in relation to tree management, and that any revisions be reviewed and approved by the Chair and Vice-Chair of the Committee.**

Following the conclusion of item 4, the Environment and Sustainability Officer left the meeting.

## **29 SURREY ENVIRONMENT PARTNERSHIP - SEP2025**

The Committee received a report requesting that the Committee reviews and endorses SEP2025 on behalf of the Council.

Following consideration, Councillor Julie Morris proposed a motion to defer consideration of the matter until the next ordinary meeting of the Committee in order to allow for the opportunity for the Committee to receive comment on the matter from the Transport and Waste Services Manager, who could not be present at the meeting.

The proposal was seconded by Councillor Steven McCormick.

The Committee unanimously resolved to defer consideration of the matter until the next ordinary meeting of the Committee.

### 30 PLAYGROUND PROJECT FOR BOURNE HALL

The Committee received a report seeking approval for the provision of a multi-sensory play area in Bourne Hall park for children under six years old.

The Committee considered the following matters:

- a) In response to a question from a Member, the Streetcare Manager informed the Committee that currently no contractor for the play area project had been procured but was a matter under current investigation. She explained that should the Committee be minded to agree the recommendation, the work on the play area and the work on the patio at Bourne Hall would be conducted simultaneously in the Springtime.
- b) In response to questions from Members, the Streetcare Manager explained that safety fencing will surround the perimeter of the play area. She explained that the area will contain small-scale play equipment, with an emphasis on the encouragement of imaginative play, and contain no large climbing frames. The play area will be located away from areas where waterfowl mess collects. She explained that the possibility of having a gated entrance to the play area was being considered.

Following consideration, the Committee unanimously resolved to:

- (1) Approve the procurement and installation of a toddler play area outside the library at Bourne Hall as detailed in this report.**

### 31 2023/24 ANNUAL INCREASE FOR HOME GROUND AGREEMENTS

The Committee received a report recommending the annual increase to the home ground agreement charges coming into effect from 1 April 2023.

The Committee considered the following matters:

- a) A Member queried the disparity between the increase to charges for Football/Cricket pitches and for Bowls greens. The Streetcare Manager explained that, following the pandemic, a lot of Bowls Club members terminated their memberships due to cost, and that the Clubs were

experiencing difficulty in replacing lost members – the lower increase for Bowls greens was in the interest of the survival of Bowls in the Borough. The Chair explained that Bowls greens are very costly to bring back once gone, as compared with Football/Cricket pitches.

Following consideration, the Committee resolved (3 votes for, 3 votes against, and the Chair exercising his casting vote in favour of the recommendation) to:

- (1) Agree the increase to the charge for home ground agreements as set out in appendix 1 of the report.**

*The meeting began at 7.30 pm and ended at 8.09 pm*

COUNCILLOR JOHN BECKETT (CHAIR)



## **SURREY ENVIRONMENT PARTNERSHIP - SEP2025**

<b>Head of Service:</b>	Ian Dyer, Head of Operational Services
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision?(yes/no)</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	<u>Appendix 1</u> : SEP2025 as approved by SEP Members Group on 23 November 2022

### **Summary**

The Surrey Environment Partnership (SEP) has generated a high-level approach document on county-wide waste management for the period 2023 – 2025, which it has called SEP2025.

This report requests that the Committee reviews and endorses SEP2025 on behalf of the Council.

### **Recommendation (s)**

#### **The Committee is asked to:**

- (1) Endorse SEP2025 on behalf of the Council**

#### **1 Reason for Recommendation**

- 1.1 It is a legal requirement that two-tier waste authority areas, such as Surrey, must from time-to-time generate countywide strategy documents.
- 1.2 These strategies, called Joint Municipal Waste Management Strategies (JMWMS) are generated from time to time by the Surrey Environment Partnership (SEP) on behalf of Surrey's eleven districts and boroughs and Surrey County Council (SCC).
- 1.3 The Committee has always endorsed such strategies on behalf of the Council, including any caveats that the Committee may deem appropriate.

- 1.4 As detailed below, SEP2025 is an interim, high-level approach document only, rather than a fully-fledged JMWMS. However, SEP has asked that each council reviews and endorses SEP2025 through its usual democratic process.

## 2 Background

- 2.1 SEP is a cross-Surrey forum that seeks partnership approaches to waste management issues in Surrey. The Council is represented at SEP by the Chair of this Committee.
- 2.2 SEP is non-binding. Individual councils remain autonomous within Surrey's two-tier structure, whereby boroughs and districts are Waste Collection Authorities and SCC is the Waste Disposal Authority.
- 2.3 It is a legal requirement that two-tier waste authority areas, such as Surrey, must from time-to-time generate county-wide strategy documents (JMWMS). SEP generates these on behalf of, and in consultation with, all of Surrey's councils. Any new JMWMS is legally required to go out for public consultation.
- 2.4 A new JMWMS is usually generated every four to five years. However, SEP has not generated a new JMWMS since 2015 because we still await significant announcements from the national waste strategy (which was first proposed in 2018).
- 2.5 Three elements of the national waste strategy will particularly affect councils:
  - 2.5.1 **Extended Producer Responsibility (EPR)**: aims to reduce how much packaging councils must collect, and to make it more recyclable. Some announcements have been made, but there remains a great deal of detail yet to be announced. Government has stated that EPR will start on 1 April 2024.
  - 2.5.2 **Deposit Return Scheme (DRS)**: aims to independently recycle cans and plastic bottles (and eventually glass bottles as well), reducing what councils will be required to collect. Some announcements have been made but, again, there remains a great deal of detail yet to be announced. Government had stated that DRS would start in 2023 but this has recently been revised to 2025.
  - 2.5.3 **Consistency of Collections ('Consistency')**: aims to tell councils what recyclables we must collect, and how. And it proposes that garden waste collection subscriptions should be removed or severely reduced. These proposals would radically alter the nature, cost and performance of kerbside collections across Surrey. No announcements have yet been made despite repeated assurances from government that they are imminent. SEP and other industry bodies have pressed government to make announcements as soon as possible.

- 2.6 As a result of these significant issues remaining in abeyance, SEP has felt it inappropriate to generate a new, full JMWMS until outcomes of the national waste strategy are known.
- 2.7 So, with national waste strategy outcomes likely to be both known and starting to impact councils by 2025, SEP decided to develop a high-level approach document for the period 2023 – 2025, which it calls SEP2025.
- 2.8 It may be noted that, unlike a full JMWMS, an approach document such as SEP2025 does not require a public consultation.
- 2.9 Full JMWMSs have many specific actions that underpin their overarching strategy aims. However, SEP2025 is a high-level approach document, only, that contains only high-level aspirations and broad workstream themes:

High-level aspirations	Broad workstream themes
<ul style="list-style-type: none"> <li>• Considering how the national waste strategy might affect Surrey’s councils.</li> <li>• Strategic direction for the next three years, and a longer-term vision for SEP that will follow the waste hierarchy and work towards zero waste.</li> <li>• Work to drive down food waste and plastic waste.</li> <li>• Work to reduce the contamination of recycling bins.</li> </ul>	<ul style="list-style-type: none"> <li>• Reducing refuse, especially food waste thrown away in refuse bins; reducing fly-tipping; reducing litter; promoting re-use.</li> <li>• Reducing contamination of recycling bins.</li> <li>• Understanding greener vehicle options.</li> <li>• Supporting the development of waste disposal infrastructure (although developments in Epsom &amp; Ewell seem unlikely).</li> <li>• Working together to consider what Consistency of Collections means for Surrey councils (when announcements are made), and how we can/should respond.</li> </ul>

- 2.10 As a high-level approach document, SEP2025 does not, in itself, propose specific actions:

2.10.1 However, SEP generates an annual work programme, which is reviewed and approved each year by its Members Group. An example of SEP’s 2022/23 work programme is included in the SEP2025 document at [Appendix 1](#).

2.10.2 SEP will continue to generate annual work programmes, which will be further informed by SEP2025's high-level aims and objectives.

2.11 SEP2025 was approved by the SEP Members Group (including, as previously noted, the Committee Chair) at its meeting on 23 November 2022. A full copy of SEP2025 is shown at [Appendix 1](#).

2.12 Officers consider SEP2025 to be a reasonable, appropriate document with supportable aims.

### **3 Risk Assessment**

Legal or other duties

3.1 Equality Impact Assessment

3.1.1 SEP2025 is a high-level approach document that carries no inherent equalities implications.

3.2 Crime & Disorder

3.2.1 SEP already considers fly-tipping and littering, and SEP2025 proposes that it should continue to do so.

3.3 Safeguarding

3.3.1 No safeguarding implications.

3.4 Dependencies

3.4.1 SEP2025 does not, of itself, carry any financial implications (other than the control of financial implications inherent in, for example, work to reduce contamination of recycling bins or evaluate the best response to the national waste strategy).

3.4.2 However, an indirect financial dependency brought about by SCC is discussed in section 4, below.

3.5 Other

3.5.1 Overall, SEP2025 is a relatively simple, high-level document, with reasonable content. It considers issues that face all Surrey councils and that are important to our residents. SEP2025 does not seek to change the status of SEP relative to the Council. In itself, therefore, SEP2025 presents little risk.

3.5.2 As summarised in section 2.5, above, the national waste strategy could significantly change how much waste, of what type, the Council is required to collect, how it collects it and how much that will cost residents. SEP2025 should help to mitigate those risks through its proposed partnership approach to understanding and generating solutions for those issues. Such an approach has served us well before when, in 2015/16, SEP put considerable effort into joint working to navigate the EU Waste Directive. That partnership approach greatly reduced the burden of legislative response required from each individual council, gave consistent advice to all councils and created surety for our respective collection services.

3.5.3 SEP2025 does contain some targets that have yet to be clearly justified, because we do not yet know what the true effects of the national waste strategy will be (nor, indeed, exactly when they will take effect). What is clear, however, is that SEP2025's modelling suggests that – even including predicted effects of the national waste strategy – Surrey, overall, will not achieve the targets proposed within the national waste strategy.

#### **4 Financial Implications**

4.1 SEP2025 itself carries no specific financial arrangements. However three indirect implications may be noted, as below.

#### **4.2 Indirect implication (1) – the national waste strategy:**

4.2.1 The national waste strategy could have significant financial impacts from such things as:

- How much councils get paid by EPR
- How material volumes may change as a result of EPR and DRS
- The costs of being forced to change our collection services
- Limits on how much we can charge for garden waste collections.

4.2.2 While SEP2025 cannot directly affect these things, its commitments to work together to understand the national waste strategy, and to formulate recommended responses, are likely to be very useful. Previous such joint work has been very productive and efficient.

4.2.3 It is crucial that, when national waste strategy announcements are made, the Council is well placed to understand and respond to them in the most cost-effective way possible. Joint work as proposed in SEP2025 will facilitate that.

#### **4.3 SEP annual work programme:**

4.3.1 Some SEP workstreams (see examples for 2022/23 in [Appendix 1](#)) have limited financial implications for individual boroughs and districts. For example, work to develop recycling infrastructure at flats may involve the purchase of bins and the application of staff resources.

4.3.2 But, in general, most SEP workstreams are either fully or significantly funded by SEP. Thus, SEP2025, in itself, has only limited financial implications, and within existing Council budgets.

#### 4.4 SCC annual waste payments:

4.4.1 Each year SCC makes payments to the boroughs and districts in support of their waste collections. For Epsom & Ewell this currently amounts to some £120k per annum.

4.4.2 These payments are from SCC, not SEP, and have never previously been linked to SEP activities or JMWMSs.

4.4.3 However, after the development of SEP2025 (which is an SEP initiative, not SCC), SCC announced unilaterally that it would be making its payments for the years 2023/24 – 2025/26 conditional on councils' support for SEP2025. For this, SCC announced that it required each district and borough to generate action plans in support of SEP2025 which would be scrutinised each year, and payments made according to how much SCC believed we had supported the aims and objectives of SEP2025 in that year.

4.4.4 It must be clearly noted that this arrangement was proposed unilaterally by SCC after the development of SEP2025. It was never (and still is not) a part of SEP2025 itself, nor was it proposed by SEP.

4.4.5 However, SCC's proposal was significantly objected to by the SEP Member Group at its meeting on 22 November 2022. Consequently, SCC changed its proposal to a trial system as follows:

- **Year 1 (2023/24):** SEP (not SCC) will agree action plans with each borough and district. At the end of the year, outcomes will be reviewed by SEP (not SCC), and any recommendations for improvements the following year will be discussed with each borough and district. This will be seen as a trial year, and no SCC payment deductions will be made.
- **Year 2 (2024/25):** the same arrangements will apply. Again, this will be a trial year and no SCC payment deductions will be made.
- **Year 3 (2025/26):** the same arrangements will apply. But SCC may then – and only then – consider changes to its waste

payments for 2025/26. However, SCC has committed to reviewing this with SEP at that time, before any final decision is taken by SCC.

- Thereafter, it seems likely that new payment structures will, anyway, have taken effect as a result of the national waste strategy, which may effectively make SCC funding partly or fully redundant.

4.4.6 It must be reiterated that SCC's desire to link its payments to SEP2025 was its own, unilateral, decision made after the development of SEP2025, and neither solicited nor supported by SEP.

4.4.7 Past experience has clearly shown that SCC has the legal power to unilaterally reduce its payments to boroughs and districts if it so wishes. Indeed, it has done so significantly in the recent past. However, after discussion at the SEP Members Group, SCC committed to the more reasonable course of action outlined above.

4.5 **Section 151 Officer's comments:** SEP2025 does not impact existing council waste budgets for 2023/24 and aims to mitigate the financial impact of the anticipated national waste strategy on boroughs and districts. Finance officers will work with waste colleagues to understand the finance implications of any future government announcements.

## 5 Legal Implications

5.1 SEP is a legally non-binding group. As already noted, SEP2025 is a high-level approach document only, with no legal power.

5.2 **Legal Officer's comments:** Under section 32(1) of Waste and Emissions Act 2003 waste authorities for a two-tier area must, at all times, have for the area a joint strategy for the management of (a) waste from households, and (b) other waste that, because of its nature or composition, is similar to waste from households. Section 32(2) of Waste and Emissions Act 2003 requires the waste authorities for a two-tier area to keep under review the policies formulated by them for the purposes of subsection (1).

5.3 SEP2025 is not the Joint Municipal Waste Management Strategy (JMWMS) so the local authorities are not required to carry out a public consultation before formulating the policy.

5.4 SEP2025 is not a legally binding document and does not create legal obligations.

## 6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** SEP2025 supports the Council's theme of Green & Vibrant.

- 6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan. This is because SEP2025 is a high-level approach document only.
- 6.3 **Climate & Environmental Impact of recommendations:** SEP2025 aims to support the waste hierarchy of Reduce-Reuse-Recycle-Recover. Therefore, it supports the Council's climate change ambitions.
- 6.4 **Sustainability Policy & Community Safety Implications:** By supporting the waste hierarchy, SEP2025 supports the Council's sustainability ambitions.
- 6.5 **Partnerships:** SEP is a key partnership in terms of waste management. The Council has played an active role within SEP for two decades.

## 7 Background papers

- 7.1 The documents referred to in compiling this report are as follows:

### Previous reports:

- Previous JMWMS strategies have been presented to this Committee for endorsement in 2006, 2010 and 2015 (with an updated version of the 2015 JMWMS reviewed by the Committee in 2018).

### Other papers:

- National waste strategy:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)



**Environment and Safe Communities Committee  
21 March 2023**

**SURREY ENVIRONMENT PARTNERSHIP - SEP2025**

**Appendix 1**

**Index:**

Overarching SEP2025 approach document	Pages 2 – 13
Summary of current SEP work programme 2022/23	Pages 14 – 18
Summary of responsibilities in a two tier waste authority such as Surrey	Page 19
Summary of SEP performance	Pages 20 – 25



**Surrey  
Environment  
Partnership**

## **SEP 2025**

A partnership approach to waste prevention and recycling

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Changes</b>	<b>Distribution</b>
1.0	Nick Meadows	5/10/22	First draft	SEP 2025 Steering Group and the SEP Officers Group
2.0	Nick Meadows	27/10/22	Amendments throughout following partner feedback	SEP Officers Group
3.0	Nick Meadows	16/11/22	Minor amendments to give additional information in places	SEP Members Group
4.0	Nick Meadows	23/11/22	Final draft following feedback from the SEP Members Group	SEP Officers and Members Group

## Executive Summary

SEP (Surrey Environment Partnership) continuously strives to improve collection and disposal services in Surrey and aspires to be among the best nationally on all key performance indicators.

Since the Resources and Waste Strategy (RaWS) for England was published in December 2018, the Government has consulted on a number of the strategy's ambitions across a range of subjects, the results of which will provide policy direction, which we eagerly await. The policy situation combined with Surrey's growing population, increasing numbers of households, and changes in the types of waste produced by our residents means change is a certainty. However, the exact direction of the change and the impact it will have on our collection and disposal services remains unclear.

Whilst things are so uncertain, now is not the right time to update the Joint Municipal Waste Management Strategy (JMWMS) and consult with residents, so we need a short-term approach to help manage Surrey's recycling and waste in the most efficient, effective, economical and sustainable way.

SEP 2025 has been developed to bridge the gap between our existing out-of-date JMWMS and further clarity from central government. It will reflect the vision of SEP and provide clear strategic direction for the partnership for the next three years to 2025 and a longer-term vision that will allow SEP to continue to follow the waste hierarchy and work towards zero waste.

SEP 2025 is therefore a partnership approach to waste prevention and recycling, and has been developed on behalf of all Surrey local authorities through the SEP.

## Background, policy, context and vision

### Background

SEP is made up of Surrey County Council (SCC) and the 11 district and borough councils in the county (as shown in Figure 1 below). It was formed originally as the Surrey Waste Partnership (SWP) in 2009 to overcome the challenges of two-tier service delivery and aims to manage Surrey's recycling and waste in the most efficient, effective, economical, and sustainable way possible. SEP's plan (the JMWMS) outlined our approach to achieving this.

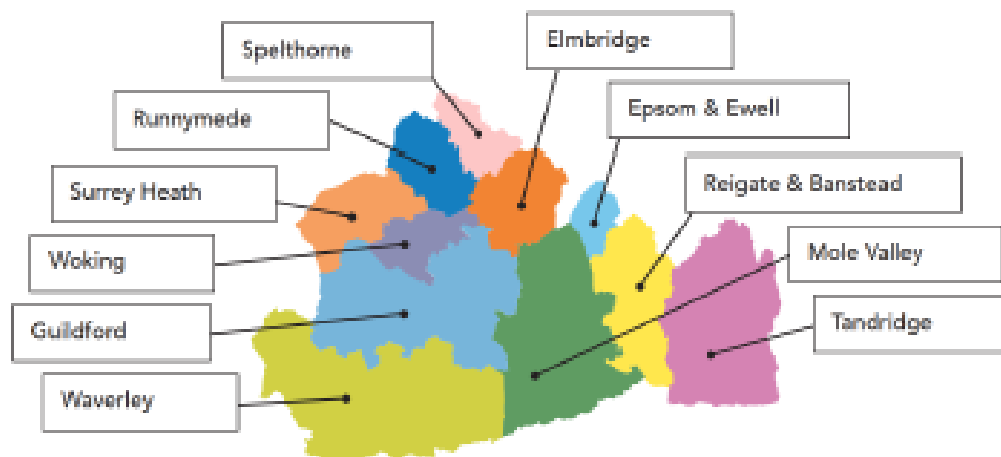


Figure 1: A map of Surrey showing the district and borough council areas

SEP's current JMWMS is meant to run until 2024-25. However, it was last updated in 2015 and is therefore considered to be 'out-of-date'. This was delayed due to the publication of the RaWS, which proposes some fundamental changes on how recycling and waste services will be funded and delivered in the future (further explained below). The key policy to support the RaWS is still emerging and therefore, the review has been postponed until national direction is clearer.

It was also decided to stop the annual monitoring of the JMWMS's action plan at the end of 2017-18 and in its place annual work programmes were developed instead. They have been in place each year through to the latest programme for 2022-23. These have effectively been the plan for working together in partnership since 2018-19. The current SEP work programme for 2022-23 can be found in **Annex 1**.

The partnership name was changed from SWP to SEP in April 2019 to reflect a growing remit and desire to tackle wider environmental issues in Surrey.

### Existing policy

As a group of councils providing recycling and waste management services, we have several duties and responsibilities in accordance with relevant key legislation. These are set out in **Annex 2**, which has been the legislative framework that we have operated under during the last 30 years.

A key concept set out here is the 'waste hierarchy', which ranks waste management options according to what is best for the environment. It gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for reuse, then recycling, then recovery<sup>1</sup> (this is where most of our residual waste goes in Surrey), and last of all disposal, e.g., landfill, as shown in **Figure 2** below.



**Figure 2: Waste Framework Directive - five step waste hierarchy<sup>1</sup>**

<sup>1</sup> this includes anaerobic digestion, incineration with energy recovery, gasification which produces energy (fuels, heat and power) and materials from waste.

## New and emerging policy

Several policies are currently being developed following the publication of the RaWS. Launched in December 2018, RaWS is the Government's plan to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. This will see products kept in use for as long as possible, making it easier to reuse, repair, refurbish or recycle them (as illustrated in Figure 3 below).

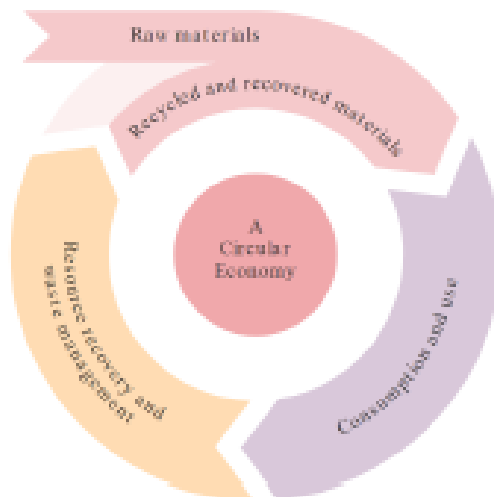


Figure 3: A circular economy<sup>11</sup>

RaWS combines actions the Government will take now with firm commitments for the coming years and gives a clear longer term policy direction in line with its [25 Year Environment Plan](#).

RaWS has set out several proposed policy reforms including to:

- Invoke the 'polluter pays' principle through **extended producer responsibility (EPR)** for packaging to ensure producers of products bear financial responsibility for the management of the waste stage of a product's life cycle (except ground litter). The Government has committed to introducing this from April 2024. The key change for local authorities is that they will be compensated for the necessary costs of managing packaging waste from households, community recycling centres and street bins. Defra is still working on the details of this with more clarity expected in 2023.
- Introduce a **deposit return scheme (DRS)** for drinks containers to reward residents for bringing back bottles and encourage them not to litter them; thereby increasing the quality and quantity of recycling. This is to include cans and plastic bottles of between 50ml and 3l and will include containers sold both individually and as part of a multipack. Glass bottles will not be included. The scheme is still under consideration for implementation from late 2024.
- Improve recycling rates by ensuring consistency in **household and business recycling** collections. This is still under consideration for implementation from 2023-24, but are likely to be delayed slightly to coincide with EPR. Key proposals include:
  - Collection of the same dry recyclable materials (glass, metal, plastic and paper and card) as separately as possible (with consideration given to circumstances where separate collection of recyclable waste streams may

not be technically or economically practicable or may not provide a significant environmental benefit).

- Collection of additional dry recycling (metal jar lids, aerosols, cartons, aluminium foil and trays, aluminium tubes, and plastic films and pouches). The Government has so far stated that plastic films and flexibles must be collected by local authorities for recycling by 31 March 2027.
  - Collection of food waste separately at least once a week.
  - Collection of garden waste for free or for a maximum cost.
  - Service standards for collection arrangements and frequency.
- The above proposals on recycling consistency together with EPR and DRS are now collectively known as the collection and packaging reforms (CPR).
  - Stimulate demand for recycled plastic by introducing a **tax on plastic packaging** manufactured in or imported into the UK that contains less than 30% recycled plastics. This came into effect on 1 April 2022.
  - Reducing the use of unnecessary single-use plastic (SUP) products including bans on items such as plastic straws, cotton buds, and drink stirrers. These were banned from 1 October 2020 and supply stopped from 3 July 2021. Proposals to ban plastic plates and cups, balloon sticks, polystyrene cups, expanded polystyrene food boxes, trays and pots. If agreed these proposed bans would come into effect in April 2023.
  - The introduction of a mandatory takeback scheme for the collection and recycling of fibre-based composite cups (disposable coffee cups). This is set to come in from 2024.

The measures in RaWS alongside other key plans have set out strategic ambitions to be achieved nationally over the next 30 years such as:

- Increase the municipal recycling rate to 55% by 2025 and 65% by 2035.
- Near elimination of biodegradable municipal waste to landfill from 2028.
- Work towards eliminating food waste to landfill by 2030.
- 78% recycling rate for packaging by 2030.
- Business fleet owners and operators work towards 100% of vehicle fleets being zero emission by 2030, or earlier where markets allow (COP28 ambition).
- No more than 10% of municipal waste to landfill by 2035.
- 50% reduction in per capita residual waste (excluding major mineral wastes) by 2042 from 2019 levels (proposed).
- Work towards eliminating avoidable waste by 2050.
- Net zero domestic greenhouse gas emissions by 2050.

To that end, the Government introduced the [Environment Act 2021](#) in November 2021 that makes provision for most of these targets and gives them the legislative power to introduce the measures above. The act will also make some changes to existing legislations to enable consistency in collections.

## Context

In Surrey about £105 million<sup>2</sup> is spent each year collecting, managing and processing recycling and waste. By increasing the amount of waste prevented and the proportion

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<sup>2</sup> From the Local Authority Revenue Expenditure and Financing: 2020-21 Final Outturn, England

recycled in the county it enables the cost of this service to reduce. It also benefits the environment; less raw materials are required, saving energy, emissions and protecting natural resources.

Significant achievements have been made possible by working together as a partnership; the most notable being our improved recycling rate, which in 2010-11 was 46.4% (13<sup>th</sup> highest nationally) and by 2020-21 was 55.1% (3<sup>rd</sup> highest nationally). More information on current performance can be found in **Annex 3**.

Despite this, it's now the right time to revisit how we work together, considering some of the challenges we face including the emerging policy to support RaWS. The direction of travel is not clear on this yet but should become apparent over the next couple of years. So, while now is not the right time to update the Surrey JMWMS and consult with residents whilst things are so uncertain, we do need a short-term approach to help us ensure we continue to manage Surrey's recycling and waste in the most efficient, effective, economical and sustainable way.

Therefore, our response to this emerging situation is to develop a partnership approach to waste prevention and recycling in Surrey for the next three years. This will look to, as a minimum, align with the Government's ambitions such as a 55% recycling rate by 2025 and 65% by 2035. There might be a requirement as a high performing county in England to go beyond this. In any event, we will strive to go beyond the national targets where possible and begin to respond to decarbonisation by planning changes to our vehicle fleets and infrastructure to reduce emissions in the shorter term and move towards net zero emissions in the longer term. The approach will.

- Bridge the gap ahead of further clarity from central Government.
- Consider the anticipated changes that may result from the key emerging national policy to support RaWS.
- Provide clear strategic direction for the next three years and a longer-term vision for the partnership that will continue to follow the waste hierarchy and work towards zero waste<sup>3</sup> reducing emissions in the process. This will aid the future development of a new JMWMS for Surrey post-2025.
- Enable us to drive down waste (particularly food and SUP waste) and increase the quality and quantity of our recycling.

#### Our vision

With the above in mind, we have developed the following vision statement for SEP 2025:

*Our vision is to eliminate avoidable waste and reuse, repair, recycle and recover any waste which cannot be eradicated in the most economical way.*

*Surrey's councils will continue to work in partnership to ensure our residents receive the highest quality of collection and disposal services possible and encourage our residents to reduce their household waste and own their impact on the natural environment.*

*Our ambition is to decarbonise our fleet and ensure that any new infrastructure is built and operated to minimise carbon emissions.*

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<sup>3</sup> means that at least 90% of operational waste has been reduced, reused, repurposed or recycled compared to the original baseline.

## Key drivers and priorities

### Drivers for change

We are at a crucial point now where we must reconsider how we can prevent more waste from arising, increase the quality and quantity of recycling and manage waste in the long term to minimise the impact on the environment and move towards a circular economy, which is being driven by several pressures including:

#### Emerging national policy

We will need to align with emerging national policies (as outlined above) that will be enshrined in legislation. While the policies aren't clear yet, they will fundamentally change the way recycling and waste services are funded and delivered. Therefore, we'll need to be mindful for future service provision and well prepared to deliver any required changes resulting from new national policy in the best way possible.

#### Reducing carbon at pace

Most authorities in Surrey have declared a climate emergency and all have set a target for reaching net zero emissions as individual organisations. Of the 12 authorities in Surrey, nine have agreed to be carbon neutral organisations by 2030, one authority by 2035, and two by 2050. The climate change strategies and action plans that have been produced by Surrey authorities recognise the carbon that recycling, and waste collection and disposal operations emit. They also recognise the role that preventing and reducing waste, increasing reuse and recycling and planned changes to vehicle fleets and infrastructure will play in tackling climate change.

#### Increasing population and number of households

The population of Surrey could rise to an estimated 1,309,500 by 2041, which could translate into 34,000 new houses being constructed<sup>4</sup>. This will result in more recycling and waste and therefore more pressure on our waste collection and disposal services.

#### Budget pressures

Surrey's authorities are facing unprecedented challenges because of reduced financial support from the Government combined with an increasing population and greater demand for our services. In addition, we are now experiencing the cost-of-living crisis in which prices for many commodities have risen sharply meaning services and infrastructure projects will cost more. This situation is being caused in part by a rise in inflation in the UK, in addition to the economic impact of global issues including the 2022 Russian invasion of Ukraine and COVID-19 pandemic (which had already reduced economic activity across the county whilst further increasing the support our communities need from us).

#### Infrastructure limitations

There is only one energy from waste type facility (an Eco Park which includes a gasifier<sup>5</sup> and an anaerobic digestion<sup>6</sup> plant), a lack of recycling processing infrastructure and there are

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<sup>4</sup> Office for National Statistics

<sup>5</sup> A process used to convert waste into energy

<sup>6</sup> A process which uses micro-organisms to break down biodegradable material



limitations with transfer stations in the county such as the distance to/from them for some waste collection and street cleansing rounds. This situation drives up cost and emissions, which come from transporting waste over longer distances. Also, where we use third party sites to sort recycling, we are limited by what the operator chooses to accept, which drives up inconsistency and causes confusion for household waste collection regimes. Over the next two to three years, SEP will need to consider infrastructure options for future service delivery that reflects the plans and strategies across authorities and enables successful attainment of the performance objectives and targets set out in this document.

### Stalling performance

The amount of residual waste per household in Surrey has been falling since 2013-14, hitting a low of 450.9kg per household in 2019-20. However, the COVID-19 pandemic saw this figure increase with more people being at home. While this is starting to decrease again as we move away from the pandemic, much more will need to be done to reach the proposed national target of a 50% reduction on 2019 levels by 2042.

Also, recycling rates levelled off back in 2016-17, and Surrey's performance has stayed around the 55% mark. While this meets the national target for 2025, significant investment and/or changes to approach will likely be required to meet the 65% recycling rate target by 2035.

A recent composition analysis (set out in Annex 3) highlighted there is still an estimated 90,000 tonnes of material in residual bins which can be recycled. So, the scope for significant improvement on both residual waste reduction and recycling does exist.

### Key priorities

The challenges set out above mean that the current situation is unsustainable. We need to reduce costs where possible whilst increasing performance and still providing a high-quality service to Surrey residents. To that end, we believe our key priorities should be to:

**Table 1: SEP 2025 priorities**

<p><b>Reduce all residual waste with a particular focus on food waste</b> To ensure focus is applied at the top of the waste hierarchy and to align with national targets, we will focus on reducing residual waste by preventing it in the first place. Compared to high performing authorities in England, Surrey has a much higher level of residual waste. We will use the learning gained from these authorities in our future work programmes, and we will continue to engage with Surrey residents to reduce their waste, especially food waste.</p>
<p><b>Promote and maximise reuse</b> To support the principle of a circular economy, we will seek to maximise opportunities to keep products in use for as long as possible through sharing, reuse, repair and refurbishment. This is an area we'll provide focus and priority to by developing a reuse strategy for Surrey.</p>
<p><b>Increase participation in food waste recycling</b> Of course, it's best to reduce food waste where possible, but any food that is left over should be composted<sup>7</sup> or recycled, not only for the environmental benefits, but because of the money that can be saved, as it costs less than a third to recycle food waste than it</p>

<sup>7</sup> This should be done in a completely enclosed process such as a food waste digester as to not attract vermin

<p>does to dispose of it as rubbish. Our capture rate for food waste recycling in Surrey in 2021 was 43%, and as the composition analysis highlighted, there is still an estimated 50,954 tonnes of food waste in residual bins that could be recycled. Therefore, as well as trying to reduce food waste from arising at all, increasing participation in food waste recycling will continue to be a priority for us.</p>
<p><b>Increase the quality and quantity of dry mixed recycling (DMR)</b> The recent composition analysis highlighted that there are still over 20,000 tonnes of plastic, paper and card, glass and metals that could be collected for recycling. Increasing the quantity collected and reducing contamination of DMR further (13,837 tonnes of recycling was rejected in 2020-21) will boost performance towards the 65% recycling rate target and will improve the quality of material and the prices we receive for selling it to re-processors. Therefore, we will work to improve the quantity and quality of the DMR recycling that we collect, which aligns with emerging policy.</p>
<p><b>Decarbonise our waste collection and street cleansing vehicle fleet</b> To align with our ambition to reach net zero emissions, we must look to reduce emissions from our collection vehicle fleet and switch to alternative fuels<sup>9</sup>. Therefore, SEP will develop a plan over the next couple of years to look at how we can achieve this objective to decarbonise our waste collection and street cleansing vehicle fleet that recognises the challenges that exist including affordability.</p>
<p><b>Support the development of infrastructure</b> We will consider what appropriate infrastructure is required to power our vehicles and how we create it, addressing limitations with the lack of recycling and waste infrastructure in the county and work together to develop solutions that address our collective needs.</p>
<p><b>Support optimised collections</b> We will help review collections, especially with the upcoming national changes in mind, so services run in the most optimal way from a financial and emissions viewpoint.</p>
<p><b>Reduce fly-tipping</b> We will work with enforcement teams to help bring those who fly-tip to justice, with the longer-term impact of reducing fly-tipping.</p>
<p><b>Reduce litter</b> We will develop a strategy which sets out our approach to tackling litter, and how we will work with different groups to take advantage of any funding opportunities that arise to reduce litter.</p>

## The partnership approach to delivering our vision and priorities

### Targets

We appointed Eunomia Research and Consulting to develop a long-term waste flow model for Surrey. The model was created to help us understand how far upcoming national changes and the work we do will get us towards achieving national and existing local targets. Working with Eunomia, we reviewed a range of different scenarios to enable us to set realistic targets for the next three years (the monitoring period of SEP 2025) that keep us

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<sup>9</sup> This could include renewable diesel, biodiesel, electric or hydrogen. Options appraisal to be determined.

on track in the short term to meet longer term national targets. Our partnership targets are set out in Table 2 below.

Table 2: SEP 2025 targets

Measure	2021-22 (unaudited) <sup>9</sup>	SEP 2025 (monitoring period)		
		2023-24	2024-25	2025-26
Residual waste per household (KG)	470.95	461	449	446
Recycling rate (inc DRS)	54.43%	56%	57%	58%
Food waste capture rate	43% <sup>10</sup>		48% <sup>11</sup>	
DMR contamination rate	8.9%	<8%	<8%	<8%
Waste to landfill	15.1%	<6%	<3% <sup>12</sup>	<3%

The targets set out above have factored in the following measures that we think will happen nationally and locally over this three-year period:

#### National measures

- The SUP bans on plastic plates and cups, balloon sticks, polystyrene cups, expanded polystyrene food boxes, trays and pots come in from April 2023.
- The implementation of EPR from 2024, through a combination of mandatory labelling, consistency in collections and national communications campaigns, is expected to increase capture rates of recyclable packaging material.
- It is expected that there will be a change in waste composition due to EPR fee modulation and recyclability requirements when this comes in from 2025. There is likely to be a shift from non-recyclable pots, tubs and trays and composite packaging to recyclable alternatives, and some change from flexible composites to mono-material flexible polyethylene. There could be further changes in the recyclability of 'other plastics'; more challenging formats (composite flexible packaging and tubes) could also become recyclable.
- The UK Government introduce an additional set of core materials that must be collected at the kerbside for recycling. This will result in kerbside collections of at least cartons, aluminium foil and trays (from 2024), and film and plastic bags (from 2027).
- The UK Government introduce a DRS for plastic bottles and cans from late 2024, whereby materials will be returned via a separate network, but the recycling rate is apportioned to local authorities.

#### Local measures

- Food waste collections will be rolled out to all flats in Surrey where space and operations permit.
- The food waste recycling and DMR contamination reduction intervention work will continue to be developed and delivered by SEP in collaboration with Surrey's councils.

<sup>9</sup> Data for a financial year is confirmed and made available to the public once information has been validated by the WasteDataFlow team and the Environment Agency. This usually happens on the following December.

<sup>10</sup> Figure from 2021 composition analysis

<sup>11</sup> To be measured when the next composition analysis is carried out in 2024/25

<sup>12</sup> Aligns with SCC's target set out in their waste disposal contract re-procurement

- SEP will continue to encourage Surrey residents through multiple platforms to participate in food waste recycling.

### Strategic objectives and actions

To address our priorities above and meet our targets, we must deliver the work which is described in the strategic objectives and key actions in Table 3 below.

**Table 3: List of strategic objectives and key actions**

Strategic objective	Key actions
Deliver joint work programmes that focus on partnership priorities	<ul style="list-style-type: none"> <li>• Continued creation of annual work programmes that address the key priorities of the partnership to reduce waste, increase food waste recycling, reduce contamination to improve the quality and quantity of DMR and decarbonise our vehicle fleet. This will move to a new level of focus which will tie in with the individual authority delivery plans mentioned below.</li> <li>• Develop an infrastructure and transport plan that enables us to comply with the RaWS and key emerging policy; and decarbonise the fleet ideally by 2030 but in line with existing local authority policies.</li> <li>• Develop key countywide strategies for reuse and litter.</li> </ul>
Set local targets and actions	<ul style="list-style-type: none"> <li>• Develop and agree annual performance indicators for each Surrey council that will contribute towards the overall partnership targets, along with individualised delivery plans that will enable the realisation of local and countywide targets.</li> </ul>
Exploit further opportunities to work jointly	<ul style="list-style-type: none"> <li>• Build on past work and look at opportunities to carry out joint processes where viable to procure required products (vehicles and bins/containers) to introduce consistent collections as determined by emerging Government policy.</li> </ul>
Respond to policy	<ul style="list-style-type: none"> <li>• Continue to respond to consultations held by Government on proposed policy to ensure our collective views are heard and that SEP 2025 remains aligned.</li> <li>• Engage positively with industry groups such as the Association of Directors of Environment, Economy, Planning &amp; Transport (ADEPT), The Local Authority Recycling Advisory Committee (LARAC) and The National Association of Waste Disposal Officers (NAWDO) to raise concerns and share thoughts and ideas on future policy and its implementation.</li> </ul>
Adopt best practice	<ul style="list-style-type: none"> <li>• Continue to research top performing authorities in England that are comparable to Surrey's authorities using rurality and deprivation as a starting point, and overlaying delivery factors, and then feed this learning into the development of the above annual work programmes and individual delivery plans.</li> <li>• Work with the fly-tipping enforcement teams to continue to share and develop intelligence, knowledge and best practice.</li> </ul>

### Monitoring

Progress against the targets, key actions including the annual SEP work programme and local delivery plans will be monitored quarterly. A standard template will be developed for this, and it will be reported back to the SEP Officers and Members Group at their quarterly meetings.

### Review

Targets and the work programme/individual delivery plans will be reviewed annually with adjustments to targets made where necessary including adding new projects to the annual SEP work programme and individual delivery plans, where required to support target achievement. This will be developed and agreed with the SEP Officers and Members Groups.

### Revision process

SEP 2025 is set to run to 2025. At the start of 2025 (the final year for SEP 2025) we'll begin work on developing a new Surrey JMWMS. At this point we should have further clarity from Government on the way forward following the implementation of the RaWS measures which are set to start from 2024-25. Once the Surrey JMWMS is drafted, consulted on, approved and adopted, this will be our new plan for partnership working from 2026.

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<sup>1</sup> Waste Framework Directive 2008. Image taken from [Waste Framework Directive \(eur-lex.europa.eu\)](https://eur-lex.europa.eu/eli/dir/2008/1226/oj).

<sup>2</sup> Resources and Waste Strategy. Image taken from <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england/resources-and-waste-strategy-at-a-glance>



# Surrey Environment Partnership Work Programme

2022 - 2023



## Objectives

The focus for 2022-23 will be supporting the SEP priorities which are waste reduction, food waste recycling and reducing contamination of dry mixed recycling. Activity will include making service improvements that ensure Surrey residents are enabled to make the changes we are asking of them, as well as communicating and engaging with residents to influence their behaviour and help them understand how their current behaviours impact the environment.

Work will also include providing the required data and insights to inform decision making and improve resident understanding of what happens to their waste, as well as managing the partnership and defining the future waste strategy for Surrey.

The objectives are to:

1. Develop and deliver initiatives to support the priority area of waste reduction, with a particular emphasis on food waste.
2. Develop and deliver initiatives to support the priority area of food waste recycling.
3. Develop and deliver initiatives to support the priority area of reducing contamination and improving the quality and quantity of dry mixed recycling.
4. Educate and encourage residents and their children to take action to reduce, reuse and recycle quality material.
5. Develop and implement a new recycling and waste strategy for Surrey and associated delivery plans.
6. Further improve our use of data and insight in order to better inform decision-making and communication with partners and residents.
7. Ensure partners are kept informed and the reputation of SEP continues to be protected and developed.
8. Manage the partnership effectively to ensure activities are delivered with appropriate governance and oversight.
9. Develop and maintain links with other groups and initiatives to ensure that our work remains relevant in the wider context.
10. Ensure that we have the capacity to be able to respond to new issues and opportunities as they arise.

**Programme of activity**

For each objective we have detailed below the activities for 2022-23. These will be reviewed regularly and updated as appropriate. Also included is how success will be measured for each objective and the input required from partners to ensure successful delivery.

Objective 1: Develop and deliver initiatives to support the priority area of waste reduction, with a particular emphasis on food waste reduction			
Activity	Description	How will success be measured?	Partner responsibilities
Waste reduction incentive scheme	Continued management of the Rethink Waste scheme currently being trialled in Elmbridge. The trial will run until March 2023, but it will be evaluated from November 2022 to establish whether it should be rolled out more widely within the county in 2023-24.	Reduction in residual waste tonnage in Elmbridge, and resident sign up and engagement with the scheme.	Elmbridge Borough Council: Promotion of scheme.
Compost bin and hot composter 'sales'	Run and promote a series of time-limited 'sales' which offer residents the opportunity to buy a discounted compost bin or hot composter to manage their garden and food waste at home.	Sales of compost bins and hot composters and return on investment from tonnage diverted.	All partners: Use communications toolkits to share messages and promote sales.
Food waste reduction partnerships	Carry out a review of any organisations that operate within Surrey which we could partner with to promote food waste reduction and reuse, promoting a local circular economy for any food waste which cannot be prevented.	Identification of organisations who are willing to partner with us to reduce food waste.	All partners: Provide details of any known organisations that could be approached.
Food waste reduction online toolkit	Create a new section of the SEP website featuring links to existing food waste reduction tools and national initiatives.  Communications to signpost residents to the resources – paid promotion to be covered by campaign budget included under objective 4.	Web page views plus communications reach and engagement.	All partners: - Add link to new section to own websites. - Use communications toolkit to share messages and promote the new online resource.

Objective 2: Develop and deliver initiatives to support the priority area of food waste recycling			
Activity	Description	How will success be measured?	Partner responsibilities
Food recycling at flats	Introduce food recycling at flats where there is currently no collection, including providing bins, liners and communication materials to engage residents in the new service.	Number of properties a new food waste service is provided to. Monitoring of fill levels to assess participation in new services.	All partners: - Provide site details. - Review and approval of communication materials. - Carry out delivery of food bins and caddies. - Carry out crew training (where bins are different from current) including testing on vehicles. - Work with contractor / DSO supervisors to plan new collection routes. - Resolve any collection problems. - Briefing of local customer service team and members. Provide safe storage of bins / associated items.
	Re-launch existing food recycling services at flats with improved bins, signage, liners and communication materials to engage residents in the re-launch and increase use of the service.	Number of properties covered. Comparison of pre-monitoring and post-monitoring fill levels and caddy orders to assess increases in participation.	All partners: - Provide site details. - Review and approval of communication materials. - Carry out delivery of food bins and caddies. - Carry out crew training (where bins are different from current) including testing on vehicles.

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			<ul style="list-style-type: none"> <li>- Resolve any collection problems.</li> <li>- Briefing of local customer service team and members.</li> </ul> Provide safe storage of bins / associated items.
Food waste recycling targeted interventions	Roll out of interventions which were successful in previous trials, i.e., use of no food waste stickers on residual bins combined with communications delivered through letterbox. Will be targeted at low performing households, identified via in-cab exceptions data if available, or round tonnage/ local operational knowledge.	Increase in resident participation in the service and/or tonnages depending on data availability.	All participating D&Bs: - Discussion and agreement of data to be used/ areas to be targeted. - Review and approval of intervention materials. - Briefing of local customer service team and members. Provision of any caddies or food bins requested.
Explore adding 'no food waste' to new residual bins	Explore options for all D&Bs to include a 'no food waste' message on all new residual waste bins, to direct residents to use the food waste recycling service.	Identifying a practical approach that can be implemented to include a 'no food waste' message on new residual waste bins.	Provide input to discussions of options.
Review replacement food bin policies	Carry out a review of current policies for providing replacement food bins and caddies and assess options to make them easily available to residents.	Reaching agreement on an approach that could align policies to make food bins and caddies easily available to residents.	Provide input to discussions of options.
Investigate regular flats bin cleaning	Investigate and trial options for introducing regular cleaning of communal food waste bins, to resolve hygiene issues and make the bins more appealing for residents to use.	Carrying out trials and producing an options appraisal with a cost benefit analysis for introducing regular bin cleaning.	Provide input to discussions of options. Partners participating in trials: - Provide suitable site details. - Assist in co-ordinating with timing of collections. Briefing of local customer service team and members.

Objective 3: Develop and deliver initiatives to support the priority area of reducing contamination and improving the quality and quantity of dry mixed recycling.			
Activity	Description	How will success be measured?	Partner responsibilities
Contamination reduction at flats	Continuing the rollout of measures to reduce the contamination of communal recycling bins at blocks of flats with significant issues. This will include reviewing bin capacity, introducing reduced aperture lids and locks or providing one-off replacements of broken locks, updating signage and providing communication materials to encourage residents to recycle the right items.	Number of properties covered. Comparison of pre-monitoring and post-monitoring observations of contamination levels to assess improvements in material quality.	All partners: - Provide site details and attend site visits where required. - Review and approval of communication materials. - Carry out delivery of DMR bins. - Carry out crew training (where bins are different from current), including testing on vehicles. - Resolve any collection problems. - Briefing of local customer service team and members. Provide safe storage of bins / associated items.
Contamination interventions	Continuing the trial of targeted letters to residents who repeatedly contaminate. Taking learnings from trials started in the joint contract areas and carrying out further trials in other authorities.	Reduction in the number of repeated contaminators.	All participating D&Bs: - Provide in-cab lock out data as required and agree address lists to target. - Review and approval of communication materials. Briefing of local customer service team and members.
	Scope options to procure a third party to carry out monitoring or interventions. This could potentially involve monitoring whether collection crews are correctly identifying and not emptying contaminated bins or tagging bins that are contaminated.	Summary of actions taken by individual authorities to improve crew performance in response to monitoring results. This may include the results of locally managed spot checks/monitoring	All participating D&Bs: - Provide training/guidance to contractor on the expected practise for locking out bins. - Provide round data on streets to target.

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		showing any improvements to performance.  Reduction in rejected loads and reduced contamination levels.	<ul style="list-style-type: none"> <li>- Briefing of local customer service team and members.</li> <li>- To act on the results of monitoring, to deliver any required local improvements e.g. crew training.</li> </ul> <p>To conduct spot checks following the delivery of any improvements and share the results within three months.</p>
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Objective 4: Educate and encourage residents and their children to take action to reduce, reuse and recycle quality material			
Activity	Description	How will success be measured?	Partner responsibilities
Own Your Impact campaign	<p>Year-long communications campaign badged under a new theme 'Own Your Impact'.</p> <p>To include the following specific campaign phases to support SEP's priority areas:</p> <ul style="list-style-type: none"> <li>- 1 x food waste reduction.</li> <li>- 2 x food waste recycling.</li> <li>- 1 x contamination reduction/ recycling education.</li> <li>- 1 x festive season contamination reduction.</li> </ul> <p>Ongoing communications activity to encourage and motivate residents to reduce waste, including single-use plastics and to reuse or repair where possible. This will link to national awareness days/weeks and events where relevant.</p> <p>Support and promotion of national WRAP initiatives:</p> <ul style="list-style-type: none"> <li>- Recycle Week (2022 theme TBC).</li> <li>- Food Waste Action Week (reduction focus).</li> </ul>	<p>Independent research to evaluate the impact of the campaign and service guides with residents. This will look at a range of measures such as awareness, message penetration, relevance, persuasiveness, engagement and claimed behaviour change.</p> <p>Digital channel metrics including website visits and social media reach and engagements (e.g., shares, retweets, video views and comments).</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Use campaign toolkits to share messages with residents and staff through own channels.</li> <li>- Share posts/tweets from SEP social media channels.</li> </ul>
Surrey Recycles search tool, app and waste sorting game	<p>Ongoing management, updates and improvements to the search tool, app and waste sorting game which aim to educate residents and specifically reduce contamination of mixed recycling bins.</p> <p>Communications to encourage and increase usage of the tool, app and game undertaken as part of the Own Your Impact campaign.</p>	<p>Increase in the number of searches and downloads of the Surrey Recycles search tool and app and plays of the waste sorting game.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Promotion of the search tool, app and waste sorting game.</li> </ul> <p>Providing updates when services or acceptance criteria changes.</p>
Service guides and calendars	<p>Creation and distribution of printed annual recycling guides tailored for each area but based on a consistent template. Optional calendars also included where requested.</p> <p>Communication activity on social media to highlight the recycling guides to residents and encourage them to read and retain them.</p>	<p>Independent research to evaluate the impact of the campaign and service guides with residents. This will look at a range of measures such as awareness, retention and message penetration.</p> <p>Social media reach and engagement.</p>	<p>All participating D&amp;Bs:</p> <ul style="list-style-type: none"> <li>- Providing content for guides.</li> <li>- Reviewing and signing off content.</li> <li>- Providing residential postal addresses where relevant.</li> </ul> <p>Use of communications</p>
SEP digital channels	<p>Ongoing management, development and promotion of the SEP website and social media channels on Facebook, Twitter, Instagram and YouTube. Budget also covers subscriptions to a photo library for design use, film editing and animation tools, social media management system and e-newsletter software.</p>	<p>Digital metrics including website page views, social media reach and engagements (likes/shares/comments/retweets etc) and video views.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Adding relevant SEP website links to own websites.</li> </ul> <p>Sharing content from SEP channels on own channels.</p>
Primary schools'	<p>Promotion of SEP website educational resources to primary school teachers.</p>	<p>Website visits and downloads of resources.</p>	<p>All partners</p> <p>Promotion of the resources.</p>

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education programme	Development of additional new resources for the 2022/23 academic year to add to the SEP website.		
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Objective 5: Develop and implement a new recycling and waste strategy for Surrey and associated delivery plans			
Activity	Description	How will success be measured?	Partner responsibilities
Key waste policy consultation responses	<p>Produce and submit partnership responses to possible further consultations on the Government's Resources and Waste Strategy including a new written assessment process for separate recycling collection, minimum service standards, recycling credits, proposals from the Waste Prevention Programme for England, and any other waste related consultations that may arise throughout the year.</p>	<p>Agree and submit responses ahead of deadlines.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Review and input into SEP responses where necessary.</li> </ul> <p>Produce individual response where required using the SEP responses as a template.</p>
SEP 2025: A partnership approach to waste prevention and recycling	<p>Development of 'SEP 2025: A partnership approach to waste prevention and recycling', which will look as a minimum to align with the Government's ambitions such as a 55% recycling rate by 2025 and 65% by 2035 and strive to go beyond this, and begin to respond to decarbonisation by planning changes to our vehicle fleets and infrastructure to reduce emissions in the shorter term and move towards net-zero emissions in the longer term. SEP 2025 will:</p> <ul style="list-style-type: none"> <li>• bridge the gap ahead of further clarity from central government;</li> <li>• take into account the anticipated changes resulting from the key emerging national policy to support the Resources and Waste Strategy;</li> <li>• provide clear strategic direction for the next 3 years and a longer term vision for the partnership that will continue to follow the waste hierarchy and work towards a net-zero waste trajectory. This will aid the future development of a new Joint Municipal Waste Management Strategy for Surrey post 2025; and</li> <li>• enable us to drive down waste (particularly food and single use plastic waste) and increase the quality and quantity of our recycling.</li> </ul>	<p>All partners endorsing and adopting SEP 2025 by March 2023.</p> <p>Delivery of the associated targets.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Input into the design of SEP 2025.</li> </ul> <p>Endorse and adopt SEP 2025.</p>
Infrastructure & Transport Delivery Plan	<p>To review and document the existing infrastructure, it's capacity and usage.</p> <p>To consider future infrastructure requirements for managing waste in accordance with the national Resources and Waste Strategy and develop a delivery plan.</p> <p>To develop a plan to decarbonise the collection and disposal transport fleet and establish the supporting infrastructure requirements.</p>	<p>All partners endorsing and adopting the delivery plan by September 2023.</p> <p>Delivery of the associated targets set out in the final delivery plan.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Input into the review and documentation of existing infrastructure, it's capacity ad usage and in the development of future requirements.</li> <li>- Input into the plan to decarbonise the collection and disposal fleet and to understand supporting infrastructure needs.</li> <li>- Endorse and adopt the agreed final delivery plan.</li> </ul>
Future governance arrangements	<p>Agree a pathway towards formalising Surrey Environment Partnership governance and approvals processes.</p>	<p>Greater transparency of decision-making.</p> <p>SEP has delegated authority to make decisions on matters such as budget</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Input into development of proposals.</li> </ul> <p>Provide information on individual authority governance arrangements and approvals processes.</p>

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		agreement and approvals for strategy consultations.	
Funding mechanisms	Carry out a review of options to introduce a short-term financial incentive to increase food waste recycling and/or reduce contamination, prior to any new burdens funding from government, as part of the SEP funding mechanism. This would recognise the additional cost to D&Bs of expanding services.  Agree SEP and WCA funding arrangements for 2023-24 onwards in light of changes that will arise from the national Resources and Waste Strategy.	Reaching agreement on a financial incentive to introduce.	All partners: - Provide input to discussions of options. SCC: Agree and communicate funding arrangements for 2023-24 in time for individual authority budget setting cycles, with the aim of establishing a financial mechanism that will remain year-on-year until further funding arrangements develop through government policy.
Support the development of disposal contract requirements	Support SCC in developing the requirements for new waste disposal arrangements for 2024 onwards to ensure a strategic fit with the future direction of travel.  Ensure sufficient provision and management mechanisms within the new disposal contract(s) to ensure quality data is issued and updated in a timely manner and consistent format.	SCC are supported to ensure that future waste disposal arrangements are aligned with the strategic direction of the SEP.  The contractor(s) provide quality and reliable data within timescales required	SCC: - Consultation with partners as appropriate Districts and Boroughs: - Provide feedback on proposals.

Objective 6: Further improve our use of data and insight in order to better inform decision-making and communication with partners and residents.			
Activity	Description	How will success be measured?	Partner responsibilities
Performance reporting	Use up to date data to provide analysis and insights to current trends and performance against targets, including recycling performance, emissions and contract performance.  Produce quarterly performance reports for SEP members and officers.	Members and officers are well informed regarding strategic and operational performance.  Strategic decision-making processes are based on a robust and transparent evidence base.	All partners: - Review performance reports and provide feedback on format. Help identify opportunities for performance improvement.
Data management	Management of the SEP waste data system, including contract management and managing the supply of weighbridge data.  Management of third-party contractor data so that performance reporting incorporates up to date data regarding materials collected by third parties.	Data gathering from all parties becomes fully automated, without need of further development.	All partners: Support the introduction of new processes and reporting data issues.
What happened to Surrey's waste	Creation of report and infographic highlighting what happens to the waste collected in Surrey.  Communications activity to share the report findings with residents.	Resident engagement with 'What happened to Surrey's waste' report (e.g. website visits, social media engagements).	All partners: - Promotion of the report/ sharing of communications. Surrey County Council: Help with responding to media requests relating to waste disposal.

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Future data management system	Develop options for when Open Sky contract ends in February 2023 <ul style="list-style-type: none"> <li>Undertake analysis of the OpenSky contract and data system performance, and future development requirements.</li> <li>Complete an appraisal of the options to manage data following the end of the current contract, with support of D&amp;Bs and SCC.</li> <li>Undertake procurement/implementation of the chosen option to ensure that there is no degradation of data availability / analysis.</li> </ul>	Report identifying the outcome of the review of the OpenSky contract and the potential options for the end of the contract.  Successful procurement & implementation of new system.	All partners: - Engagement of officers in the review of OpenSky and the future options.
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Objective 7: Ensure partners are kept informed and the reputation of SEP continues to be protected and developed			
Activity	Description	How will success be measured?	Partner responsibilities
Protecting and building the reputation of SEP	Respond to media enquiries from local and trade media, drafting responses and liaising with partners if appropriate.  Generate coverage in key trade media (local Surrey media engagement will be undertaken as part of the Own Your Impact campaign).  Identify, draft and submit entries for key award schemes to highlight the work being done in Surrey.	Positive media coverage. Nominations for awards. Involvement in industry/Government panels.	None.
Keeping partners informed	Monthly email updates detailing progress, outcomes and upcoming activities in the SEP programme.  An end of year report prepared for the June meeting cycle and an Annual Review of activity and outcomes created and published on the SEP website following release of Defra waste statistics.  Creation of quarterly Environment Matters email newsletter and distribution to all members and senior officers in partner authorities.	Partner feedback.	All partners: Share information with internal stakeholders.
Member seminars	Develop and deliver a programme of seminars on recycling and waste for all members across Surrey.	Partner feedback.	Help design and deliver seminars where required.

Objective 8: Manage the partnership effectively to ensure activities are delivered with appropriate governance and oversight			
Activity	Description	How will success be measured?	Partner responsibilities
SEP governance	Agenda planning in consultation with SEP Member and Officer Chairmen.  Administration of all the SEP member and officer meetings, including booking meeting venues, dispatch of papers and minute taking.	Smooth running of partnership governance processes.	Attendance at relevant meetings.

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Financial management	<p>Monthly budget monitoring processes and production of quarterly reports for partners.</p> <p>Administration of Surrey waste financial mechanisms payments and administration of recycling credits payments for organisations in the Surrey (furniture) re-use network.</p> <p>Identification of potential savings opportunities, service efficiencies and budget reductions.</p>	<p>Timely and accurate reports available for partners to review.</p> <p>Payments are made in a timely manner.</p> <p>Development and approval of a savings plan for 2023-24 and delivery of actions set out in the plan.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- To invoice for services within appropriate timescales to enable effective and efficient budget management.</li> <li>- To support the delivery of the actions set out in the savings plan.</li> </ul>
Programme management	<p>Develop work programme proposals.</p> <p>Manage the SEP work programme for 22-23 by administering a process to plan and design projects and other work that the partnership has agreed to.</p> <p>Monitor and report against progress with delivery to SEP partners on a quarterly basis.</p>	<p>Ensuring projects and other work have an agreed plan to work from.</p> <p>Providing accurate and informative updates on a quarterly basis.</p>	<p>All partners:</p> <ul style="list-style-type: none"> <li>- Input into planning and help delivery of projects and other work where required.</li> <li>- Review reports and ask for additional information where necessary.</li> </ul>

Objective 9: Develop and maintain links with other groups and initiatives to ensure that our work remains relevant in the wider context			
Activity	Description	How will success be measured?	Partner responsibilities
Fly-tipping/ Enforcement Group	Provide administration support to the Enforcement Group, which is made up of officers from each Surrey authority.	Partners are kept up to date with what is happening across Surrey and issues can be dealt with as they arise.	All partners - relevant officers to attend meetings.
Waste industry groups	Attend meetings and monitor updates from groups such as ADEPT, South East Waste Partnership Managers, NAWDO and LARAC.	Good relationships built with industry and authority colleagues. Insights and intelligence gained from industry experts.	None.
Surrey Comms Group	Attend meetings to share details of SEP work programme and keep informed about other countywide communications work being undertaken.  Share toolkits for upcoming SEP activities via Surrey Comms Group for partner communications teams to use.	Use of toolkits/ sharing of messages by partner communications teams.	All partners: - Encourage communications teams to support and share SEP messages.
Planning Officers	Liaise with planning officers to ensure that guidance on bin storage and access is provided to developers.	Best practice shared and consistent guidance used by authorities.	Districts and Boroughs: - Provide case studies and best practice examples. - Liaise with planning officers in their authorities - Publish guidance on websites where appropriate.

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Objective 10: Ensure that we have the capacity to be able to respond to new issues and opportunities as they arise.				
Activity	Description	How will success be measured?	Partner responsibilities	Budget
Crisis and issues management	Rapid response to any crises or issues that arise during the year.	To be determined by the nature of the crisis or issue and the response required.	To be determined by the nature of the crisis or issue and the response required.	Covered by underspends or reserves as appropriate.
Maximising opportunities	Allocate resource to research, develop or deliver new opportunities that emerge during the year.	To be determined by the nature of the opportunity.	To be determined by the nature of the opportunity.	Covered by underspends or reserves as appropriate.



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## **Annex 2 - Duties and responsibilities in accordance with relevant key legislation**

- **Environmental Protection Act 1990.** This is the main legislation that has covered waste management for the last 30 years. Key responsibilities include (but are not limited to):
  - A duty to provide a domestic waste collection service to households. Local authorities can also offer collection services to businesses for which they can charge. This is exempt from VAT.
  - A duty to provide domestic waste disposal and provide the necessary facilities for homeowners to dispose of their own refuse.
  - And a duty of care to handle waste responsibly.
- **EU Landfill Directive 1999.** This set minimum standards and targets to reduce reliance on landfill as a disposal option.
- **Waste and Emissions Trading Act 2003.** The JMWMS requirement sits under this. It sets out that in a two-tier area, local authorities have a legal requirement to have a joint strategy for the management of recycling and waste from households. This legislation also states that the strategy must be kept under review, and any significant future revisions will require public consultation.
- **Waste Framework Directive 2008.** This includes basic concepts and definitions related to waste management, such as definitions of recycling and waste, and a legally binding five-step waste hierarchy.
- **Waste (England and Wales) Regulations 2011, 2012.** This legislation chiefly transposes the requirements of the 2008 EU revised Waste Framework Directive into UK law. A key part of the regulation is to prioritise recycling over disposal. Local authorities are required to have regard to the waste hierarchy (above) in the preparation of waste development frameworks including local development plans.
- **Controlled Waste Regulations 2012 -** Classifies waste according to household, industrial and commercial for the provisions of the Environmental Protection Act. Sets out where charges for the collection or disposal of certain types of non-domestic household waste can be made.
- **MRF Regulations and Code of Practice 2014 -** The main aim of the regulation (implemented via the Environmental Permitting (England and Wales) (Amendment) Regulations 2014) is to improve transparency on material quality in the supply chain, through provision of accurate information on contamination levels.

### Annex 3 - Current performance and waste composition

#### Current performance

Recycling and waste performance in Surrey is currently monitored by measuring the amount of household waste generated within the county and how much of it is either recycled, recovered or sent to landfill. The most recent revision of the Surrey JMWMS gave performance data up to and including 2013-14, which showed that:

- The quantity of household waste generated in Surrey decreased by 9% from 583,518 tonnes in 2006-07 to 532,773 tonnes in 2013-14.
- The proportion of household waste that was recycled increased from 31% in 2006-7 to 52% in 2013-14.
- The amount of rubbish sent to landfill declined dramatically from 67% in 2006-07 to 11% in 2013-14.
- The amount of rubbish sent for energy recovery went from 2% in 2006-7 to 36% in 2013-14.

Since 2013-14, the total amount of household waste generated in Surrey has continued to fall, reaching a low of 507,428 tonnes in 2018-19 (a 5% reduction from 2013-14). In 2020-21 it increased significantly to 539,777 tonnes as shown in 1 below. However, this large spike correlated with the coronavirus pandemic and more people being at home. Provisional data for 2021-22, currently being audited by Defra ahead of publication in December 2022, shows that household waste decreased to approximately 520,000 tonnes.

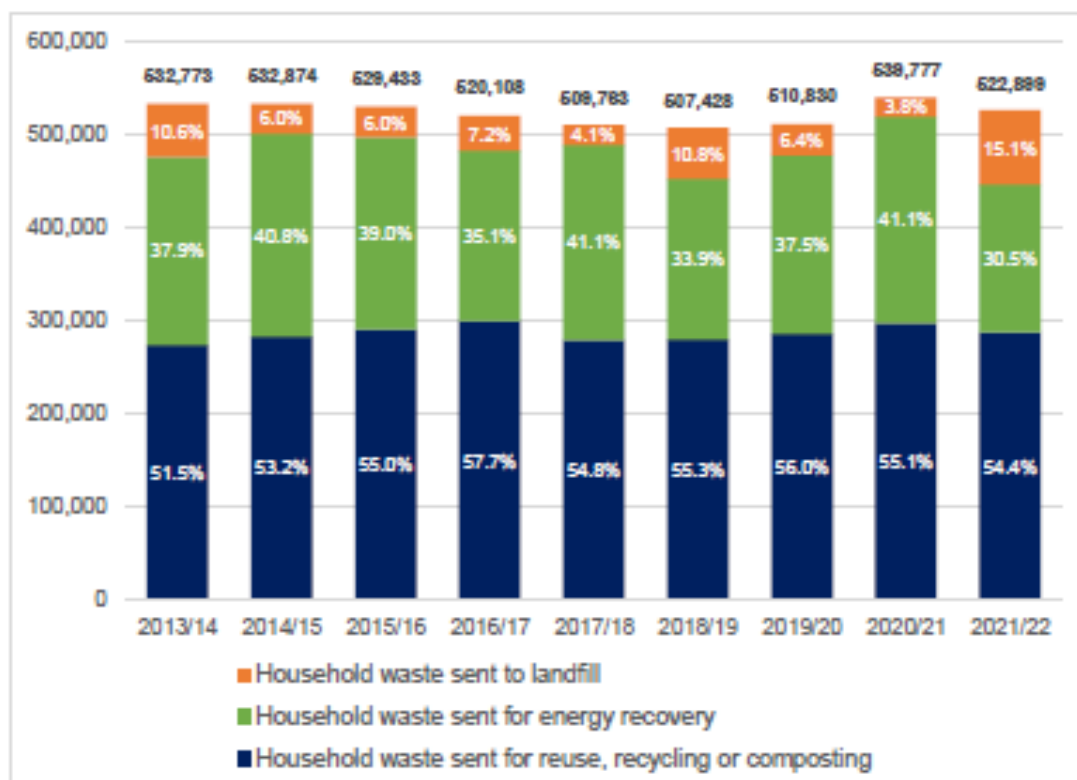
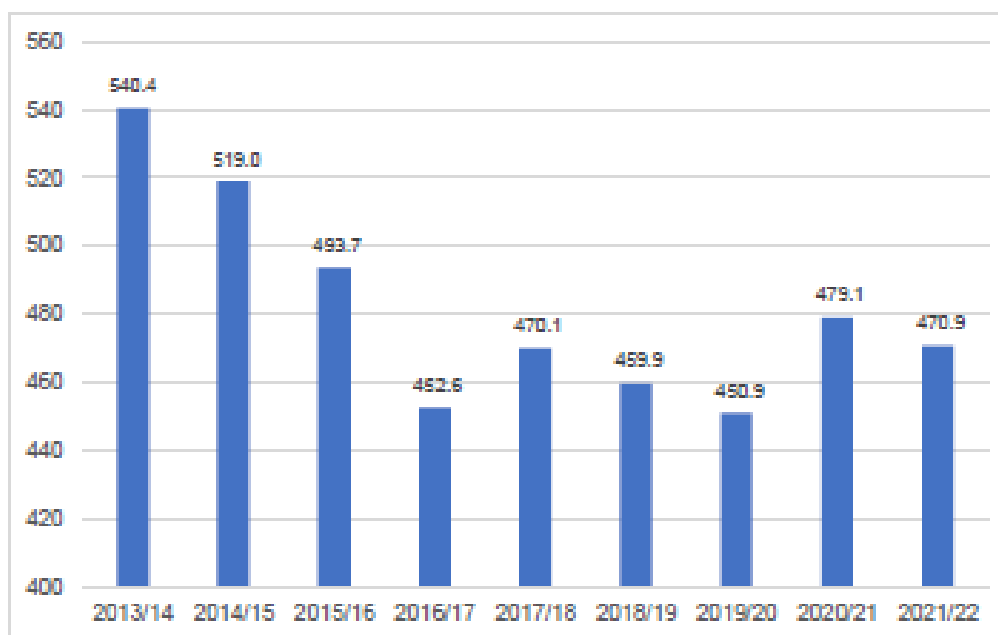


Figure 1: Household waste treated in Surrey from 2013-14 to 2021-22

Between 2013-14 and 2016-17 there was a steady increase in the proportion of household waste that was recycled each year, reaching a peak at 57.7% in 2016-17. From this point forward, SCC lost markets for recycling carpets and rigid plastics, and the ability to compost autumn leaf litter from street cleansing. Also, standards applied by the Environment Agency around what could be recycled began to tighten at this time with re-processors focussing more on quality, and not quantity, and demanding material with less contamination, which led to more recycling being rejected by materials recovery facilities (MRFs). Furthermore, Surrey had already realised most of the benefits associated with changes to recycling services such as the rollout of separate food waste collections from households, which has been provided by every Surrey authority since around 2012-13. With the above in mind, Surrey's recycling rate has fluctuated, but has remained around 55% for the last four years (Figure 1). Provisional data for 2021-22 indicates an unaudited recycling rate of 54.4%.

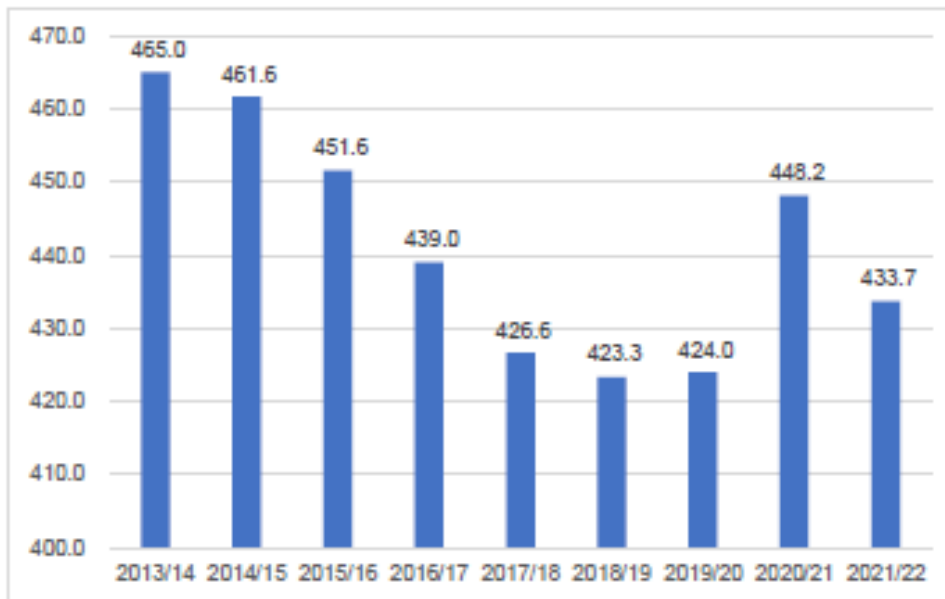
We have continued to reduce the amount of rubbish sent to landfill (Figure 1), hitting lows of around 4% in 2017-18 and 2020-21, although it has fluctuated around an average of 6 - 7%. However, provisional data for 2021-22 indicates that it has gone up to an estimated 15.1%. This was due to operational shutdowns at facilities used to treat Surrey's rubbish and a reduction in the amount of waste that was sent to facilities in Europe.

The amount of residual household waste collected per household in Surrey has been falling since 2013-14 hitting a low of 450.9kg per household in 2019-20 (Figure 2). However, there was a large spike in 2020-21, taking it up to 479.1kg per household, but again this correlates with the coronavirus pandemic and more people being at home. The unaudited data for 2021-22 now puts this at 470.9kg per household.



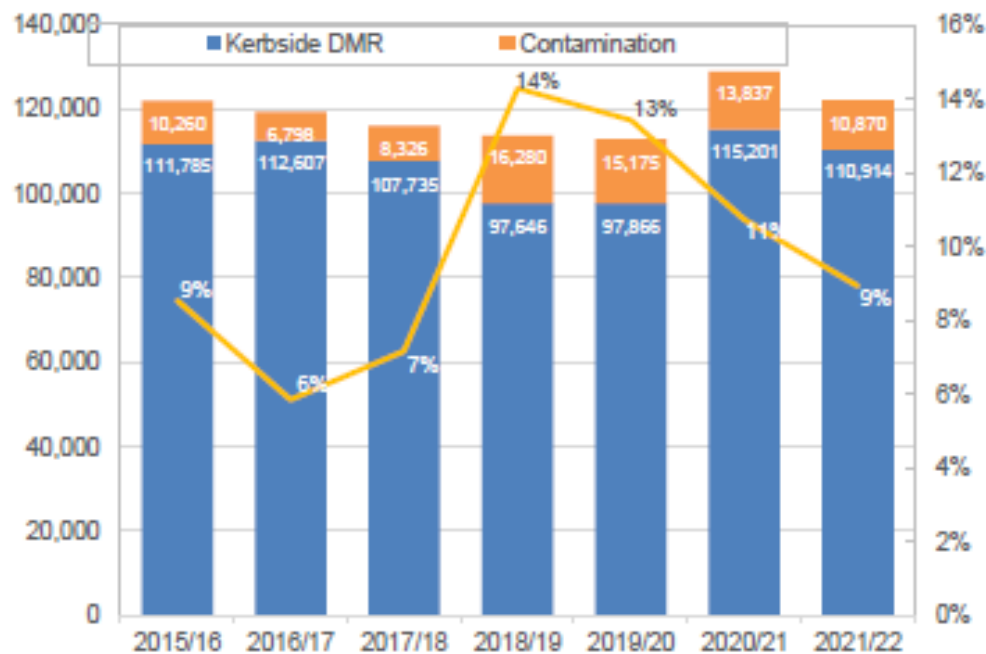
**Figure 2: Residual household waste per household (kg) in Surrey from 2013-14 to 2021-22**

The amount of household waste collected per person in Surrey has also been falling since 2013-14 (Figure 3) hitting a low of 423.3kg per person in 2018-19. Again, there was a large spike shown here in 2020-21, taking it up to 448.2kg per person, but again this correlates with the coronavirus pandemic and more people being at home. The unaudited data for 2021-22 indicates that this has dropped to 433.7kg per person.



**Figure 3: Collected household waste per person in Surrey from 2013-14 to 2021-22**

In 2015-16, data began to be collected on contamination of dry mixed recycling (DMR) following the introduction of legislation that required Material Recovery Facilities to sample material being delivered. Figure 4 shows a large spike in 2018-19, which was when data was consistently reported for all D&Bs, as it was limited before this. Since then, SEP has worked to drive down contamination, the effects of which can be seen in 2019-20 and 2020-21.



**Figure 4: Contamination of DMR in Surrey from 2015-16 to 2021-22**



### How we compare with others

Defra publishes performance data on an annual basis for each local authority in England. Table 1 below shows Surrey's position in a league table with all other local authorities in England in relation to performance data on recycling rates, residual waste per household, and collected household waste per person for 2020-21.

**Table 1: Position in the Defra league table for 2020-21**

Authority	% recycled, reused or composted	Rank in the league table	Residual household waste per household (kg)	Rank in the league table	Total household waste per person (kg)	Rank in the league table
<b>Disposal Authorities Only (out of 30)</b>						
Surrey County Council	55.1%	3rd	479.1	6th	448.2	17th
<b>Waste Collection Authorities Only (out of 308)</b>						
Elmbridge Borough Council	54.5%	37th	469.1	101st	440.5	264th
Epsom and Ewell Borough Council	53.7%	43rd	447	77th	388.3	129th
Guildford Borough Council	58.9%	15th	389.2	32nd	373.7	102nd
Mole Valley District Council	56.6%	25th	426.5	59th	437	259th
Reigate and Banstead Borough Council	53.2%	51st	413.2	49th	368.3	92nd
Runnymede Borough Council	49.0%	76th	411.9	47th	334.8	31st
Spelthorne Borough Council	46.4%	102nd	457	85th	369.8	95th
Surrey Heath Borough Council	61.3%	5th	364.9	22nd	397.1	155th
Tandridge District Council	59.9%	10th	379.6	29th	397.8	157th
Waverley Borough Council	57.0%	22nd	388.9	31st	391.2	140th
Woking Borough Council	54.3%	40th	434.5	66th	408.2	190th

Surrey has one of the best rates of recycling, reuse and composting at 55.1% (3<sup>rd</sup>) and residual waste per household at 479.1kg (6<sup>th</sup>) of all disposal authorities in England. However, it ranks around mid-table for landfill usage (14<sup>th</sup>) and collected household waste per person (17<sup>th</sup>).

Landfill rates are also provided, but this can only be compared by disposal authority. In 2020-21, Surrey ranked 14<sup>th</sup> out of 30 disposal authorities with a landfill rate of 3.8%.

Most waste collection authorities in Surrey (9 out of 11) rank in the top 50 for recycling, reuse and composting performance with Surrey Heath Borough Council placed at fifth.

However, performance on residual waste is less encouraging with just over half (8 out of 11) place in the top 50 for residual household waste per household with the rest between 59<sup>th</sup> and 101<sup>st</sup>. Only one authority of 11 is in the top 50 for collected household waste per person with the rest between 92<sup>nd</sup> and 264<sup>th</sup>.

In summary, while recycling performance is mostly encouraging, residual waste volumes are high compared to other authorities in England. To that end, there is more that can be done to improve performance in Surrey. We have looked at the top authorities in England that are comparable to Surrey's authorities in terms of rurality and deprivation to see what we can learn from them, and this thinking has been incorporated into the key actions referred to in the section on the **partnership approach to achieving our vision, objectives and targets** in the main SEP 2025 approach document.

### Where our recycling and waste goes

Surrey's residents have a keen interest in what happens to their recycling and waste with previous research suggesting that increased transparency around what happens to recycling and waste once collected can positively affect recycling behaviours. A report, *What Happened to Surrey's Waste, 2020/21*, is available on [SEP's website](#). In summary, Figure below shows that of the 539,777 tonnes of household recycling and waste generated in Surrey in 2020-21, 76.9% of it remained in the UK, 15.7% was treated in Europe (largely Germany and the Netherlands) and 7.4% was treated outside of Europe (largely India).

Of the 287,409 tonnes of recycling collected in 2020-21, 83.4% was processed in the UK, 3.1% in Europe and 13.3% outside of Europe.

Of the 242,368 tonnes of rubbish collected in 2020-21, 69.2% was treated in the UK with the remaining 30.8% treated in Europe.



Figure 5: Where our recycling and waste went in 2020-21

### Waste composition

Understanding the composition of waste in Surrey provides a valuable insight on where to target future resource to reduce waste and increase recycling. To that end we undertook detailed sampling and analysis of recycling and residual bins at houses and flats in the



summer of 2021. Based on the materials that each of the authorities are currently able to accept for recycling, Error! Reference source not found.shows the proportion of each material that was presented in the rubbish bin but that the analysis shows could have been recycled.

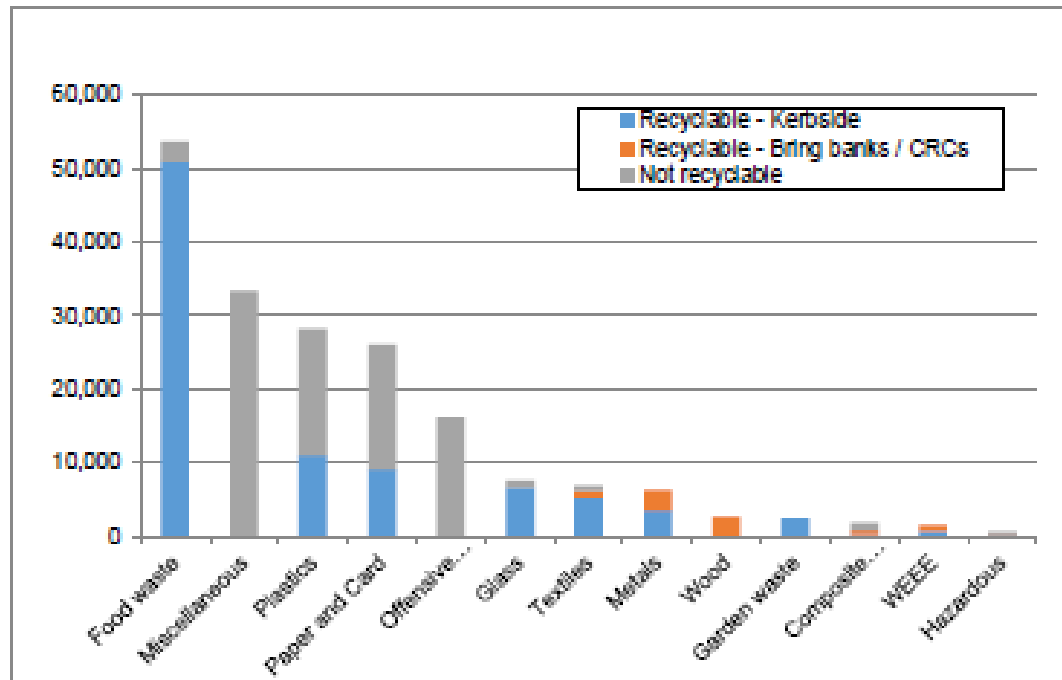


Figure 6: Recycling potential of residual waste 2021

In summary this shows that:

- Nearly 90,000 tonnes of material in kerbside rubbish bins could be recycled. Likewise, nearly 90,000 tonnes are not currently recyclable. A further 7,600 tonnes could be recycled at bring banks or Community Recycling Centres.
- The largest proportion of material which could be recycled is food waste at nearly 51,000 tonnes, over half the recyclable material. Only a small proportion of food waste is not recyclable – 2,700 tonnes of liquids and oils.
- There are significant quantities of plastics and paper and card in residual waste. However, only 40% and 30% of these respectively are recyclable, at 11,000 and 9,000 tonnes. Some plastics such as films and flexibles aren't accepted at the sorting facilities we use. This is because they can become entangled in equipment causing blockages increasing machinery downtime and, crucially, the current onward market for these materials isn't substantial. Paper and card can become contaminated when mixed with food waste, so is rejected for recycling when presented in this state. Some paper and card (shredded paper, glittery Christmas cards and wrapping paper etc.) aren't accepted for recycling as it can cause problems at the sorting facilities we use and the paper fibres are often of low grade or can't be separated.

END.

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## TENNIS IN THE BOROUGH

<b>Head of Service:</b>	Ian Dyer, Head of Operational Services
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision? (yes/no)</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	Appendix 1: Proposed Fees and Charges for new operating model

### Summary

This proposal is about modernising the way parks' tennis courts are operated and presents a clear opportunity for the Council to optimise the impact and value of its existing assets to benefit residents. This proposal relies on grant funding from the Lawn Tennis Association.

### Recommendation (s)

#### The Committee is asked to:

- (1) **Grant permission for officers to apply for a non-repayable grant from the Lawn Tennis Association to install gate technology to all tennis courts in the borough as set out in section four of this report.**
- (2) **Agree to income received for use of tennis courts to be placed in the Council's reserves and used solely for the ongoing maintenance need of the courts.**
- (3) **Agree that £10,330 identified from section 106 funding is used to carry out maintenance and improvement works on tennis courts across the borough ahead of implementing the charging scheme.**
- (4) **Agree the fees and charges for tennis provision for 2023/24 as set out in appendix 1.**
- (5) **Agree that the fees and charges will be reviewed annually and align to the LTA guidance and market testing of neighbouring authorities.**

## **1 Reason for Recommendation**

- 1.1 After exploring several funding opportunities from the Lawn Tennis Association, the recommendations presented in this report offer the Council a cost-effective operating model to provide a sustainable, well-maintained tennis provision in the Borough.
- 1.2 The five-year funding agreement from the Lawn Tennis provides for access to the ClubSpark online booking software, and installation of a gate access system to each of our tennis courts.
- 1.3 In contrast to other funding opportunities this option does not require any match funding and any income generated will be reinvested to maintain the courts.

## **2 Background**

- 2.1 The Council currently provides and maintains 12 public Tennis Courts across the borough at 5 sites. All the courts are available for commercial bookings but generate minimal income. The courts are also available free of charge to recreational players, and as such can be seen to support the 'Tennis for Free' schemes that became popular in c2008; an ethos adopted by many Councils at that time. The courts have therefore become a community resource for both professionals and residents of the borough.
- 2.2 It is of note however, that whilst a 'Tennis for Free' approach has its benefits, there is a missed opportunity for income generation, with the Lawn Tennis Association (LTA) acknowledging that a lack of income, coupled with a reduction in public sector finances had resulted in a lack of investment in facilities. This has caused participation in the sport to drop.
- 2.3 The LTA are now keen to work with Councils to help improve the current facilities and assist with promoting a sustainable operating model which will reinvigorate an interest in tennis and provide an income to support the on-going maintenance of facilities.
- 2.4 Of note, the courts in Epsom and Ewell were recently inspected by the LTA and deemed to be in reasonable condition.

## **3 Current position**

- 3.1 The current tennis offer is low profile, providing both residents and professionals/coaches/clubs with limited information in respect of how, and when the courts can be used and booked, when they are available and the fee's required.
- 3.2 The consequence of the current operational model, is that courts are accessed primarily on a no fee basis, representing a missed opportunity to generate income to fund the on-going maintenance and improvement of the courts.

- 3.3 As such, Council officers have been working with the Lawn Tennis Association and local tennis providers, to explore opportunities for improving the use of our tennis facilities.
- 3.4 The discussions resulted in a report being taken to the Community & Wellbeing Committee on 17th March 2022 and proposed that a grant application be made to the LTA to meet the cost of refurbishing and upgrading the borough's tennis courts.
- 3.5 Whilst members supported the initial proposal, the availability of grant funding from the LTA has since reduced significantly leading officers to explore other options and operating models.

#### **4 Proposal**

- 4.1 This report seeks permission from Environment Committee to pursue a non-repayable grant funding opportunity with the LTA for funds to install a new gate access system and explore options for managing the tennis courts in the future, if the application is successful.
- 4.2 This proposal is that the LTA fund the gate access system only. In this instance the Council would apply to the LTA for £20,000 non repayable grant, to fund the secure gate access system. The LTA will also provide free access to the Clubspark system which allows customers to see court availability and make online bookings.
- 4.3 An annual subscription of £2,380 for a 5-year period will be required for the yearly servicing and general maintenance of the gates and use of the software.
- 4.4 This subscription fee will be frozen from increase for the 5 years of this agreement, after this period is over the increase will be in line with inflation. At the end of the 5 years. EEBC will have the option to roll the agreement over with CIA (the gate access company) and enter negotiations or look for alternative suppliers.
- 4.5 Although match funding or upfront capital is no longer required, the £10,330 previously approved by the Community and Wellbeing Committee can be ringfenced specifically for tennis across the borough for future maintenance or to offset the annual subscription fee for the gates.
- 4.6 Should the Council adopt this approach to managing the tennis courts across the borough, existing staff would be utilised to support with bookings and any FAQ's that arise. This would take approximately 4 hours per week, or 0.1 FTE based on a G8 SCP5 costing £3,910 based on the 2023/24 salary budget. An equal portion of tennis income will be set aside to fund this staffing requirement.
- 4.7 This provides minimal risk for the Council and generates income, allowing tennis to become more sustainable in the borough.

- 4.8 The agreement will ensure that court availability for casual play is protected, the core purpose of the parks. This will include restricting the coaching providers to a defined total number of hours to deliver the programme and ensuring that there is always a certain number of courts available for casual play.
- 4.9 If members support the recommendations in this report, the current estimation to complete the funding agreement, install the gate access system and implement and promote the new online booking system is September 2023.

## 5 Risk Assessment

### Legal or other duties

#### 5.1 Equality Impact Assessment

- 5.1.1 It is important to ensure that our tennis facilities cater for all members of the community

#### 5.2 Crime & Disorder

- 5.2.1 Engaging people, especially young people in physical activity and organised sports is an effective tool to help reduce boredom, improve mental health, and create a diversion from antisocial behaviour, violence, crime, and drug use.
- 5.2.2 There are no measures that can stop people from booking one court and then occupying more courts during quieter times of the day however the benefit of this system, is that all usage can be tracked, and users contacted should you have reports that some users are taking advantage of their access rights. In other boroughs court users have policed the facilities and reported misuse to the authorities that manage these facilities.
- 5.2.3 Well-maintained and well-used sporting facilities promote a vibrancy in our parks and outdoor spaces which helps to reduce the fear of crime and disorder.

#### 5.3 Safeguarding

- 5.3.1 Tennis coaches will need to be approved through the LTA portal, as a standard, this means coaches will be DBS checked, first aid trained, and will attain public liability insurance through the LTA.
- 5.3.2 Coaches will be expected to have attained a minimum of Level 3 Tennis coaching qualification. Either as a independent coach or as a lead coach for an organisation.

5.4 Dependencies

5.4.1 Progress of this Item is dependent on a successful application to the LTA parks investment fund.

5.5 Other

5.5.1 There is a risk that if we don't pursue this opportunity the funding pot available will be depleted and an opportunity to implement the gate system to help the sustainability of our tennis courts will be missed.

5.5.2 Some residents might be reluctant to pay for a scheme that was previously free, but this can be negated with a good marketing campaign and explaining that the investment in the gate system will aid in building a sustainable operating model for the future. Our marketing strategy will comprise of a communication plan devised by our in-house communications team and a wider campaign promoted by the LTA, who have worked closely with other Boroughs to ensure a successful launch.

## 6 Financial Implications

6.1 The LTA helpfully conducted a feasibility study, and confidently ascertained that the introduction of a 'pay to play'/subscription operating model will return a healthy income to support future renovations and sustainability.

6.2 To ensure inclusivity, a discounted annual subscription will be offered to households on low incomes or those receiving benefits. All annual subscriptions will be limited to one booking per day for a maximum of two hours and applicants will need to adhere to a set of terms and conditions.

6.3 The table in paragraph 6.5 details the level of income we might expect to receive through the introduction of a £40 annual subscription for households in the borough. From their extensive knowledge of operating a subscription-based model in other boroughs,

6.4 The LTA estimate the uptake of an annual subscription will be 1400 households in the borough. Of the 1400 household the figures also assume that, 5% will pay £6 per hour to take advantage of the option to make an ad-hoc 'pay to play' booking. Please note, the figures paragraph 6.5 do not include any allowances for discounted subscriptions for low-income households or coaching packages which are outlined in Appendix One, both which could bring in a significant amount of additional income.

6.5

	Estimated annual income
Pessimistic outturn	£24,643
Realistic outturn (+10%)	£27,107
Optimistic outturn (+30%)	£32,036

\* based on 1400 households taking out a regular £40 annual subscription and 5% choosing to pay £6 per hour for an ad-hoc session. It does not include discounted subscriptions or coaching packages

6.6 Fees and Charges

- 6.6.1 The scheme will offer residents two simple payment options, both of which provide good value for money, when compared with the cost of other sporting activities in the borough.
- 6.6.2 It's proposed that the park tennis subscription will cost each household (of up to five people) £40 per annum which means all occupants living at the same address can use the same subscription. £40 is the average across Surrey with surrounding boroughs charging similar amounts.
- 6.6.3 The benefit to the subscriber is that once the payment has been made, all subsequent court bookings are free of charge. Customers will be able to book up to 7 days in advance and play up to 2 hours every day across all venues in the borough.
- 6.6.4 A play and pay option will also be available to residents, likely a preferable option for those that wish to play on an occasional basis. Pay and Play courts will be bookable 3 days in advance and sold at a standard fee of £6 per court per hour (£1.50 per person for a group of 4)
- 6.6.5 The modest subscription charge reflects that the tennis courts are in public space and reasons for implementing these charges is primarily encourage recreational players to the sport and providing a sustainable operating model to ensure the courts are well-maintained. Our customers are simply paying for court access unlike a tennis club where members have access to more facilities such as a club house, toilets, and showers.
- 6.6.6 The only additional cost subscribers and ad-hoc users will be expected to pay is for booking a floodlit court at Court Recreation Ground. The online booking system (Clubspark) will be pre-programmed to automatically apply an additional charge of £6.00 per hour charge to booking made on the floodlit courts during the winter months after dusk. This additional income will be used to offset electricity costs.



6.6.7 It is expected that the proposed fees will be frozen for the first three years to allow the scheme to establish. However, it is recommended that annual review by this committee should take place to monitor uptake and review charges. Should an increase be applied, this should be aligned to the LTA recommendations, and should be benchmarked with surrounding local authorities.

6.6.8 Income will be coded to a separate budget code set up specifically to fund ongoing costs and be reinvested back into the tennis provision. Expenditure budgets will be set for the costs related to this scheme, including staffing, maintenance, electricity and LTA subscription payments.

#### 6.7 Tennis Coaches

6.7.1 To ensure that professional coaches who are making a living from the courts make a proportionate financial contribution, whilst providing a coherent and visible community programme a proposed set of charges have been outlined in appendix one.

6.7.2 To ensure consistency with regular subscribers and ad-hoc bookings, tennis coaches will be expected to pay an additional rate on top of their annual subscription for the use of floodlit courts.

6.7.3 The LTA will assist with the recruitment of professional coaches to ensure that all coaches meet stringent criteria with regards to quality, qualifications, safeguarding, first aid and insurance.

6.7.4 Coaching places will be limited to ensure court availability for regular subscribers. If necessary, Coaches may need to apply and be appointed through a formal competitive procurement process and will be required to hold and maintain LTA accreditation for the duration of the subscription period.

6.7.5 Tennis coaches are NOT allowed to use a household subscription or book ad-hoc 'pay to play' sessions for coaching purposes.

6.7.6 All coaching packages contain a clause which commits the coach to providing a one-hour free community coaching session each week.

6.7.7 Offering coaches, a reduced rate on a block booking basis generates additional income for the Council and helps to encourage and improve engagement in the sport.

6.8 **Section 151 Officer's comments:** The financial implications are contained within the body of the report.

## 7 Legal Implications

7.1 At this stage a pro-forma has been signed to register interest and to allow funding to be set aside ready for a formal bid, however at this stage of the process there are no legal implications to consider as the council is not committed to accepting any funds awarded.

7.2 If the application is successful, legal assistance will be required to assess the terms and conditions of the LTA funding agreement and provide the advice necessary to proceed.

7.3 Legal advice will also be required at a later stage in the process to help draw up terms and conditions for the annual household subscription and coaching packages.

7.4 **Legal Officer's comments:** None for the purpose of this report

## 8 Policies, Plans & Partnerships

8.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- Safe & Well
- Opportunity & Prosperity
- Smart & Connected
- Effective Council

8.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

8.3 **Climate & Environmental Impact of recommendations:**

None for the purpose of this report

8.4 **Sustainability Policy & Community Safety Implications:**

8.5 A key benefit of this proposal is that it secures the financial and operational sustainability of the council's park tennis courts and to that end is compatible with in-house retention.

8.6 **Partnerships:**

This project is partnership between the Council and the LTA.

**9 Background papers**

9.1 The documents referred to in compiling this report are as follows:

**Previous reports:**

- Report to Community & Wellbeing Committee on 17th March 2022

<http://th-modgov-01/mgConvert2PDF.aspx?ID=23152&ISATT=1#search=%22tennis%22>

**Other papers:**

- None

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## Appendix One - Proposed Fees and Charges

### General

Ad-hoc Cost Per Hour All Courts	£6.00
Additional Cost Per Hour for Floodlights	£6.00
Annual Household Subscription	£40.00
Annual Household Subscription for those in receipt of low-income benefits	£20.00

### Coaching Packages

Package Type	Operating Days and Hours	Hours per week	No of weeks	Max hours per annum	Coaches package costs	Hourly Rate for Coaches
Package 1	off peak only Mon-Fri 0800-1600	10	40	400	£1,000.00	£2.50
Package 2	off peak and peak Mon-Fri 0800-dusk	10	40	400	£1,500.00	£3.75
Package 3	off peak and peak Mon-Sun 0800-dusk	10	40	400	£1,800.00	£4.50
Ad-hoc	Floodlight Courts Coaches Rate per hour					£9.00

### Notes:

- All coaching packages are for one year, reviewed and renewable annually
- For each package purchased, the coach must provide one free hour tennis coaching session per week of supervised community activity, this will give coaches 11 hours per week, per annum.
- Subject to availability coaches may buy multiple 10-hour packages
- All annual packages are based on 52 weeks with a 12-week discount to allow for holidays and inclement weather. Therefore, above charges are based on 40 weeks.

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## FORMATION OF ALLOTMENT WORKING GROUP

<b>Head of Service:</b>	Ian Dyer, Head of Operational Services
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision?(yes/no)</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	Appendix One – Draft Terms of Reference for the Allotment Working Group

### Summary

This report seeks approval to form of an Allotment Working Group and proposes a draft Terms of Reference for comment.

### Recommendation (s)

#### The Committee is asked to:

- (1) Approve the formation of an Allotment Working Group
- (2) Approve the draft Terms of Reference, noting any amendments.
- (3) Appoint the Vice Chair of the Environment Committee to Chair the Allotment Working Group and appoint at least two additional members of this committee to form part of the group.
- (4) To delegate authority to the Vice Chair to appoint/invite additional councillors, stakeholders and officers to the Allotment Working Group as required.

#### 1 Reason for Recommendation

- 1.1 The formation of a Working Group comprising of members, officers and stakeholders as required, is necessary to ensure that the allotment provision in the borough is fit for purpose, efficient and sustainable.

#### 2 Background

- 2.1 There are seven council managed allotments and three self-managed allotments in the borough.

- 2.2 Several changes to the administration and operational management of the service have been made over the last ten years and although the subject of allotments has been discussed by the Community and Well Being Committee over the years, the transfer of Allotments to the Environment Committee presents an opportunity to thoroughly review the service and make recommendations for improvements and sustainability.
- 2.3 It is therefore proposed that a Working Group is formed as a subgroup of the Environment Committee to undertake a thorough review of the service.
- 2.4 To set out responsibilities and provide focus for the Working Group a draft Terms of Reference has been prepared and is shown at appendix one.
- 2.5 Members are invited to comment on this draft and suggest amendments which will be made prior to circulation of the final document to the group.

### **3 Risk Assessment**

Legal or other duties

- 3.1 Equality Impact Assessment
  - None for the purpose of this report
- 3.2 Crime & Disorder
  - None for the purpose of this report
- 3.3 Safeguarding
  - None for the purpose of this report
- 3.4 Dependencies
  - None for the purpose of this report
- 3.5 Other
  - None

### **4 Financial Implications**

- 4.1 There are no specific financial implications arising from this report.
- 4.2 **Section 151 Officer's comments:** None arising from the contents of this report.

### **5 Legal Implications**

- 5.1 There are no specific legal issues arising from this report



5.2 **Legal Officer's comments:** none arising from this report

## 6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- Effective Council

6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** The Working Group will address issues such as water use and other issues which may have an environmental impact.

6.4 **Sustainability Policy & Community Safety Implications:** One of the key objectives of the Working Group is to ensure the future sustainability of the Allotment provision within the Borough.

6.5 **Partnerships:** It is suggested that the Allotment Working Group invites key stakeholders to participate in the assessment process as required.

## 7 Background papers

7.1 The documents referred to in compiling this report are as follows:

### **Previous reports:**

- None

### **Other papers:**

- None

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## Allotment Working Group

### Draft Terms of Reference

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#### Role of the Group

To assess the status of allotments in Epsom and Ewell and to make recommendations to the Environment Committee based on findings. Assessment should include but is not limited to:

- Carry out a bench marking exercise of allotment fees and charges
- Assess water charges, water conservation and usage
- To understand expenditure budgets and resources allocated to allotments
- Ensure current rules and regulations are fit for purpose
- Understand the process of migrating the current Allotment database to the My Council Services system to improve the integrity of the data, ease of administration and the customer experience
- Explore ways to reduce waiting lists and ensure 100% tenancy of all Council managed sites
- Understand and define the role of site representatives and the allotment forum
- Look at reoccurring issues on allotment sites such as waste management

#### Decision Making/Reporting

Reports and recommendations from the Group will be presented through the Committee process to Environment Committee.

#### Membership

The Chair of the group will be the Vice Chair of Environment Committee. The Vice Chair will be joined by least two members of the Environment Committee, with additional invitations sent to all Councillors who have an interest in allotments within their wards.

For efficiency, the working group should comprise of no more than ten core members.

Officers will provide support as listed and other officers will be invited to meetings as required. Stakeholders will be consulted and then invited to attend meetings, if appropriate.

**Officers:**      Head of Operational Services  
                     Streetcare Manager/Assistant Streetcare Manager  
                     Administrators/Finance/IT - when required

#### Meetings and Project Length

The frequency of meetings will be determined by the Chair or Vice Chair of Environment Committee in consultation with the Head of Operational Services, an initial suggestion is bi-monthly meetings with the overall project concluding by 30 April 2024.

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## **FOOD SAFETY SERVICE AND HEALTH AND SAFETY INTERVENTION PLANS**

<b>Head of Service:</b>	Rod Brown, Head of Housing & Community
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision?(yes/no)</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	Appendix 1 – Food Service Plan Appendix 2 – External Food Service Assessment Appendix 3 – Health and Safety Intervention Plan

### **Summary**

In compliance with national monitoring arrangements, this report sets out how the Council intends to discharge its statutory responsibilities in respect of food hygiene and health and safety interventions in the year 2023-2024 and reports on activities in the previous years.

### **Recommendation (s)**

#### **The Committee is asked to:**

- (1) Adopt the service plan for food safety.**
- (2) Adopt the intervention plan for health and safety.**
- (3) Agree to receive revised food and health and safety plans for the year 2024-2025 at a date in 2024.**

### **1 Reason for Recommendation**

- 1.1 To demonstrate compliance with section 18 of the Health and Safety at Work Act 1974 and the Framework Agreement on Official Feed and Food Controls by Local Authorities.
- 1.2 To update the committee on the priorities within the service areas and the planned use of resources.

## **2 Background**

- 2.1 The Environmental Health team based within the public protection service is deployed in many areas of public and environmental health two of which are food hygiene (inspections and interventions within food businesses), and health & safety (targeted interventions within businesses and other undertakings to support the compliance with safety obligations).
- 2.2 In each regime there are legal requirements and expectations from national authorities that they be adequately resourced and planned, with those plans being agreed by the appropriate policy making bodies within each local authority.
- 2.3 Best practice in the area of regulatory service is to establish transparent plans for the deployment of public resources and to publicise those plans.
- 2.4 Owing to the effect of Covid-19 and the implications the pandemic held for work priorities, the Council has not agreed these annual plans since 2019. Therefore the plans have been adjusted to report on the work which took place over the covid-19 pandemic period and proposes targets for the 2023-2024 financial year. It would be anticipated that equivalent plans form an annual item to committee in line with guidance.
- 2.5 During 2022 the food service area was subject to an external assessment based around the implementation of the covid-19 recovery plan. The report of this assessment is included as appendix 2 in this report.

## **3 Risk Assessment**

### Legal or other duties

- 3.1 Equality Impact Assessment
  - 3.1.1 None arising from this report
- 3.2 Crime & Disorder
  - 3.2.1 None arising from this report
- 3.3 Safeguarding
  - 3.3.1 None arising from this report
- 3.4 Dependencies
  - 3.4.1 The achievement of the targets are dependent on broadly the same level of resource allocation being maintained and not lost or reallocated to other service areas.
- 3.5 Other
  - 3.5.1 None

#### 4 Financial Implications

- 4.1 The proposals are funded from within the existing budgetary allocation.
- 4.2 **Section 151 Officer's comments:** None arising from the contents of this report.

#### 5 Legal Implications

- 5.1 The Food Standards Agency and the Health & Safety Executive monitor the effectiveness of the Authority's action taken in these service areas. The risk of under resourcing these areas is a decrease in public protection and public health, adverse publicity arising from annual reports on local authority performance and non-fulfilment of statutory obligations.
- 5.2 **Legal Officer's comments:** none for the purposes of this report

#### 6 Policies, Plans & Partnerships

- 6.1 **Council's Key Priorities:** The following Key Priorities are engaged: Safe and Well, Effective Council.
- 6.2 **Service Plans:** The matter is included within the current Service Delivery Plan.
- 6.3 **Climate & Environmental Impact of recommendations:** None
- 6.4 **Sustainability Policy & Community Safety Implications:** None
- 6.5 **Partnerships:** None

#### 7 Background papers

- 7.1 The documents referred to in compiling this report are as follows:

**Previous reports:**

- 22 October 2019 Environment and Safe Communities Committee

**Other papers:**

- Food Law Code of Practice, 2021 (Food Standards Agency)  
[<https://smartercommunications.food.gov.uk/connect/UXYpkuExoT>]  
accessed 22/5/23
- Framework Agreement on Official Feed and Food Controls by Local Authorities, 2010 (Food Standards Agency)  
[<https://acss.food.gov.uk/sites/default/files/multimedia/pdfs/enforcement/frameworkagreementno5.pdf>] accessed 22/5/23

- National Local Authority Enforcement Code Health and Safety at Work, 2012 (Health and Safety Executive)  
[<https://www.hse.gov.uk/lau/national-la-code.pdf>] accessed 22/5/23





## Food Safety Service Plan 2023-2024

### Contents

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## **1.0 Service Aim, Objectives, Key Tasks and Targets**

### **1.1 Objective, Aims and Key Tasks**

- To meet statutory responsibilities in respect of national requirements concerning official controls of food in a cost effective and responsible manner in accordance with statutory guidance.
- To encourage best practice and publish advice on Food Safety to businesses and voluntary groups.
- To discharge food safety inspection and enforcement responsibilities in accordance with the Food Law Code of Practice, Regulators Code and the Epsom & Ewell enforcement policy.
- To implement national and local food sampling programmes and to promote Food Safety.

### **1.2 Links to Corporate Objectives and Targets**

The food inspection service is relevant to several of the current key priorities.

#### **Opportunity and Prosperity**

By ensuring a level playing field through appropriate and proportional regulatory interventions, holding to account the worst offenders and supporting business by providing a degree of trusted technical advice.

#### **Safe and Well**

By ensuring a minimum standard of hygiene in business to reduce the occurrence of ill health through food borne disease and by promoting good hygiene practice in the home.

#### **Effective Council**

By discharging our duties in the most time and cost effective way.

## **2.0 Background**

### **2.1 Profile of the Local Authority**

The Borough of Epsom & Ewell is situated in the North East of Surrey, with an area of 3,411 hectares, of which over half is open space, particularly to the South and West. The Borough has a population of approximately 81,000 predominantly in suburban areas. There are in the region of 31,320 households in the Borough and the average household size is 2.58 people.

### **2.2 Organisational Structure**

A chart is attached showing the structure of the Council's Public Protection Service and with the elements involved in food hygiene delivery highlighted.

Specialist services, when required, are provided as follows

- (i) Public Analyst: Public Analysis Scientific Services, 28-32 Brunel Road, Westway Estate, Acton, W3 7XR
- (ii) Microbiological testing: UK Health Security Agency, Food, Water and Environmental Laboratory, Manor Farm Road, Porton Down Salisbury Wiltshire SP4 0JG

### **2.3 Scope of the Food Service**

The Food Safety Service exists to ensure that all food produced, purchased, stored or distributed in the Borough meets statutory requirements under conditions which are hygienic. Delivery of the service is principally centred on the delivery of Official Controls such as inspections and audits in compliance with statutory requirements followed by appropriate enforcement action as necessary. By providing this service, the Council actively contributes to the maintenance of high standards of hygiene in processes of production, preparation and sale of food throughout the Borough. Advice is given to food businesses and handlers to ensure they meet legal requirements and observe best practice designed to protect public health.

The Service also undertakes occasional food sampling, a service which complements and reinforces the overall objective of protecting public health. Sampling exercises are typically carried out as part of national surveillance projects or in response to a local incident or complaint.

The service, in certain circumstances, works in association with the UK Health Security Agency in relation to the investigation of notifications of infectious disease and food poisoning.

In addition to programmed and demand driven food hygiene inspections, and the investigation of complaints related to food and food premises, other services are delivered in commercial business premises. These include health and safety interventions, infectious disease investigations and pollution emanating from premises where food is prepared, processed or sold. The full range of the environmental health service includes the varied elements of pollution control, conditions in private sector housing and other public health and public protection obligations.

### **2.4 Demands on the Food Service**

As at April 2023 there were 555 food premises in the Borough, of these 440 were restaurants, cafes, canteens or other caterers, and 99 were retailers. The remainder are made up of small scale producers and distributors. 150 premises fall into the higher risk categories of A to C. Category A requires inspection at 6 month intervals, category B at 12 month intervals and category C at 18 month intervals in accordance with Food Safety Code of Practice issued by the Food Standards Agency. There are 41 unrated businesses where the Council has received a registration but has yet to inspect. These mainly consist of low risk home caterers combined with recently established conventional catering premises. Presently there are no approved establishments operating within the Borough. The service advises and inspects the in-house and external catering provision at the Epsom Racecourse, particularly at the time of the Derby.

Environmental Health Services is based at the Town Hall, and the service is available from 9am to 5pm Monday to Friday although a substantial proportion of premises now only open in the evening necessitating out of hours visits. In the event of a major incident or an outbreak of food poisoning, there are arrangements for contacting senior officers outside of normal office hours.

A significant proportion of catering establishments are operated by people whose first language is not English. In rare circumstances arrangements are in place for professional translation of necessary documentation and use of interpreters.

## **2.5 Enforcement Policy**

The Environmental Health Enforcement Policy was revised in 2014 to reflect the national Regulators Code and is programmed to be reviewed in the 2023-2024 year.

## **3.0 Service Delivery**

### **3.1 Food Premises Inspections**

Food premises are inspected in accordance with the Food Law Code of Practice (England) published by the Food Standards Agency.

Other premises e.g. childminders are not routinely inspected other than at their request or by referral from OFSTED. The Council, in line with other Surrey local authorities have reached an agreement with OFSTED whereby any food hygiene concerns from OFSTED inspectors will be referred to the local authority for follow up.

Additional to programmed inspections, the service also carries out a proportion of revisits during the same period. These are necessary to check whether informal action has been successful, where compliance with notices needs to be assessed and where a formal request has been made by a food business operator as part of the Food Hygiene Rating Scheme.

Any significant increase in the numbers of food related complaints or incidents would place additional demands on the service. Without additional resources this demand could only be met at the expense of the premises inspection programme and/or other areas of environmental health.

### **3.2 Food Complaints and requests for service**

Procedures exist to deal with food complaints which allows for working with Buckinghamshire and Surrey Trading Standards when necessary.

Enforcement of food safety is undertaken in accordance with the Food Safety Act 1990, EU Regulations 852/2004, the Food Safety and Hygiene (England) Regulations 2013 and associated legislation. Enforcement decisions and decisions to bring legal proceedings in appropriate cases are made in accordance with the Service's Enforcement Policy and the Scheme of Delegated Authority to Officers.

### **3.3 Primary Authority**

The Council is committed to the Primary Authority principle whereby, in order to ensure consistency of enforcement, a business can form a partnership with a local authority, often, but not always the authority where its head office exists and enforcement issues can be moderated by that authority.

Epsom & Ewell have no formal partnerships with any food business at this time.

### **3.4 Advice to Business**

Businesses are encouraged to consult the Council's website in the first instance or else the advice displayed on the website of the Food Standards Agency. Enquiries of a specific and/or technically complex nature will normally be dealt with by telephone. However officers frequently advise business during programmed inspections and other food hygiene interventions such as complaints or sampling visits.

### **3.5 Food Sampling**

The authority undertakes occasional planned food sampling in coordination with the UK Health Security Agency (UKHSA) and local initiatives.

Samples may also be submitted to the UKHSA laboratory or to the Public Analyst in support of food complaint investigations.

### **3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease**

In respect of an outbreak of food poisoning or infectious disease, procedures are set out in the Surrey Outbreak Control Plan and the Environmental Health Service will act in conjunction with UKHSA under the guidance of the Consultant in Communicable Disease Control (CCDC).

Typically Environmental Health Service receives around 150 notifications of infectious disease including food poisoning, actual or suspected and some notable instances of Hepatitis, Ecoli and legionnaire's disease which require careful handling and which require priority over the majority of other areas of work.

### **3.7 Food Safety Incidents**

Food Alerts are part of a national system of letting local authorities and consumers know about problems associated with food and, in some cases, provide details of specific action to be taken.

Where necessary a media release or high priority visits to premises are arranged.

Out of hours contact arrangements are in place whereby the Public Protection Manager can be contacted by national authorities via the Mole Valley out of hours call centre.

The resource implications are very much dependent on the category of any given alert 'For Action' alerts can potentially involve a considerable amount of work contacting and inspecting food outlets, whilst 'For information' may involve less response. To date, all work relating to food alerts has been undertaken by Environmental Health Officers and resources are considered adequate. In the event of a large-scale warning, support staff will be drawn from other areas of the Council as required.

### **3.8 Liaison with Other Organisations**

The authority has in place various arrangements to ensure that enforcement action taken in its area is consistent with that in neighbouring local authorities.

Epsom & Ewell is represented on the Surrey Food Liaison and Study Group that includes the other Surrey local authorities, Buckinghamshire and Surrey Trading Standards, UK Health Security Agency and the Food Standards Agency.

Joint working with, in particular, Trading Standards will continue and where possible, inspections will be coordinated as will action on food alerts.

Epsom & Ewell is also represented on the Surrey Infection and Environmental Control Group, which is chaired by UKHSA.

The service responds to planning consultations involving new food premises or alterations to existing premises.

Applications received by the Borough's Licensing Service that includes food preparation or sales are individually screened for likely public risk on health grounds.

### **3.9 Food Safety Promotion**

Resource constraints are such that food safety promotion is largely confined to the point of service delivery and mostly at the time of food premises inspection.

The service will seek to publicise any enforcement action which results in a fine or other sanction issued by the courts.

## **4.0 Resources**

### **4.1 Staffing Allocation**

The number of staff working on food law enforcement and related matters (including infectious diseases) is 1.2 officer full time equivalent. There are no dedicated administrative support staff and all officers carrying out official controls also have responsibilities in other fields of environmental health.

All Environmental Health qualified staff are authorised in all aspects of Food Safety Enforcement with appropriate supervision as necessary. The service operates a competency verification procedure utilising document review and occasional shadowed visits.

## **4.2 Staff Development Plan**

The Council operates a system of developmental one to one meetings with staff members and their manager. From this, learning needs are identified and provision made to fulfil them. The Food Law Code of Practice requires at least 20 hours of continuing professional development per authorised officer.

## **5.0 Quality Assessment**

In line with the Food Law Code of Practice, monitoring measures are in place to assess performance of food officers and adherence to standard working methodology.

Any newly recruited officer will be assessed in accordance with the team monitoring procedure involving shadowed visits and follow up. This also applies periodically for food officers already in post and for consultancy members of staff. Team meetings address consistency issues within the team and food service matters are discussed.

## **6.0 Reviewing the 2020-2023 years**

### **6.1 COVID-19**

During the peaks of the COVID-19 pandemic, the service was entirely suspended both in response to the suspension of the majority of the hospitality sector and owing to the Environmental Health staff being required to concentrate on COVID-19 operations such as contact tracing and enforcement. This led to extensive backlogs of food hygiene inspections which became overdue and a larger than normal business churn rate as certain businesses ceased trading and were replaced. It was also notable for the quantity of new businesses, many operating from home who started during the various lock down periods.

The 2020-2021 year was also challenging owing to long term vacancies within the team necessitating temporary consultancy staff being used to fulfil the entire food inspection programme for 2022-2023. This situation had its origins prior to COVID-19 when a position became vacant in April 2019 and despite various attempts, was only filled in February 2023.

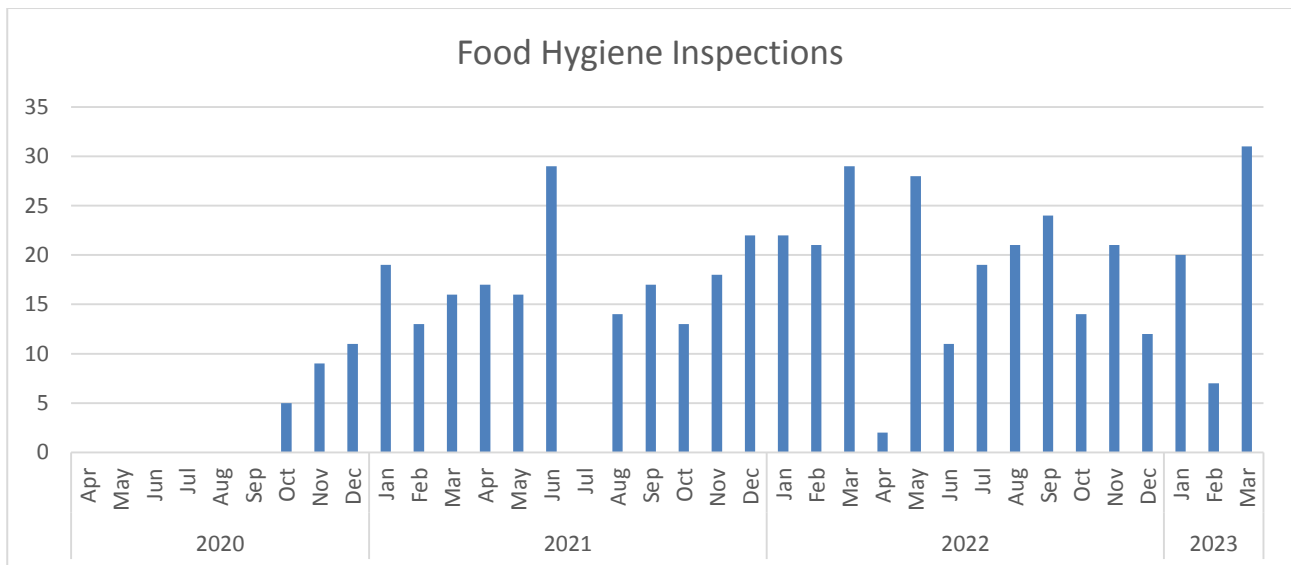
### **6.2 COVID-19 Recovery Plan**

Utilising Contain Outbreak Management Funds (COMF), the service was able to adhere to the Food Standards Agency milestones for recovery and received a positive implementation assessment from the Agency in summer 2022. As at April 2023 food official controls have been brought back in house and there are no vacancies although two new members of staff are still in a probationary period with their food competencies still to be fully assessed.

During the earlier stages of recovery, the service experimented with remote inspections via telephone and WhatsApp. This was discontinued when it became practical to resume in person physical inspections.

## 6.2 Interventions in 2020-2023

Owing to the effects of COVID-19, the food inspection programme was significantly disrupted. Consistent with the recovery plan, the service prioritised higher risk inspections and interventions where monitoring and surveillance showed an increased level of risk. The following chart shows those inspections which were achieved.



Performance of the service was directly monitored by the Environmental Health and Community Safety Manager and when that position was abolished as part of the Council's restructure, by the Principal Environmental Health Officer.

## 6.2 Food Hygiene Rating Scheme

Official food hygiene ratings appear on a national website available for public information at [www.food.gov.uk/ratings](http://www.food.gov.uk/ratings) as well as various mobile device apps. Where a business wishes to improve their score but not wait for the programmed inspection, they may pay a fee to the Council for an additional visit which will be unannounced within a three month window of making that request.

## 6.3 Complaints

For 2022-2023 48 complaints were received and investigated concerning both concerns about food and of food businesses. These ranged from allegations of food poisoning, complaints about foreign bodies in food, unfitness of food and hygiene of premises. Where valid, these complaints were investigated and action taken.



#### **6.4 Sampling**

Owing to the pressing priorities relating to COVID-19, the service has not taken any food or environmental samples since 2020.

The financial allocation set aside for Epsom & Ewell by UKHSA is in the region of £2800 per year and this is considered to be adequate. This allocation facilitates bacteriological and qualitative sampling and analysis of food, water and environmental monitoring.

#### **6.5 Education and information**

The service does provide a degree of free advice to business who either make contact independently or request advice during inspections. Environmental Health staff are also in the position to be able to refer potential new businesses to the local Growth Hub and for Epsom – the Business Improvement District.

#### **6.6 Partnership working**

Representation was made on the Surrey Food Liaison Group which includes trading standards officers to develop joint working relationships such as sampling initiatives and procedural guidance.

#### **6.7 Document review**

The majority of documentation now exists on the internet and the service no longer carries hard copies of leaflets. The Council's website contains information for businesses and the consumer whilst the Food Standards Agency website contains more technical information for those involved in food production and catering.

#### **6.8 Enforcement**

204 written warnings were issued and a voluntary part closure of a business was undertaken in 2022-2023.

#### **6.9 Alternative Enforcement Strategy (AES)**

The service has an alternative enforcement policy in place for low risk food premises involving a self assessment process. The aim of this strategy is to enable the Council to focus attention on those businesses which present the greatest risk to consumer safety and/or who are failing to meet their statutory obligations whilst relieving low risk businesses from a proportion of formal inspection. During the period of time affected by COVID-19, it was not possible to operate this policy resulting in a backlog of outstanding low risk premises interventions.

## 7.0 Plan for 2023-2024

### 7.1 Programmed inspections 2023-2024

In 2023-2024 185 premises interventions are due broken down as follows.

Category	Number
A	1
B	23
C	80
D	74
E	7 (AES)

It should be noted that addition to the due inspection programme additional inspections are also required for new food premises and business premises that close and re-opened as a different category operation and those that change management. This number is largely unpredictable as is the number of business who request a re-inspection as part of the safe guards employed under the Food Hygiene Rating Scheme.

### 7.2 Accuracy of database

The accuracy of the commercial premises database will be ensured by the following means:

- A periodic cross check against web based directories for changes to businesses in the Borough
- Updating of details via intelligence gathered during other Council visits and reported to the Environmental Health team.
- Use of local knowledge

### 7.3 Sampling

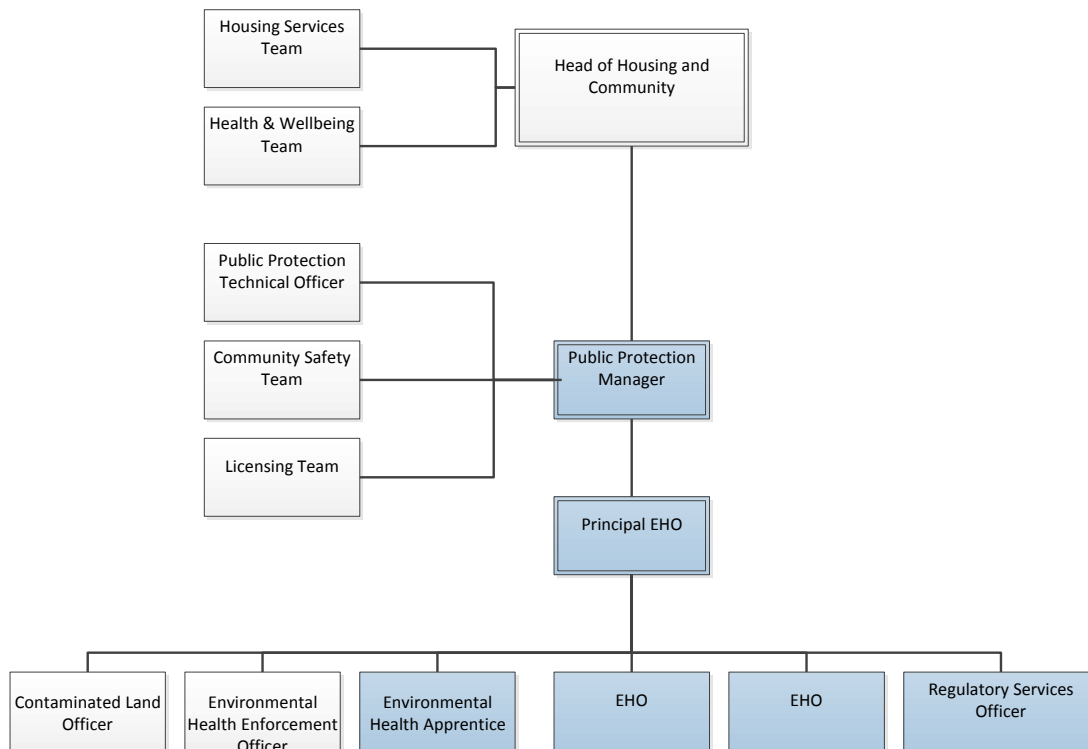
A budget of £300 has been allocated for chemical sampling of food and water. Where this is insufficient, underspends will be looked for to supplement the budget. An allocation of around £2,800 is expected from UKHSA for the routine microbiological sampling of food and water.

### 7.4 Complaints

Complaints and enquiries from members of the public will be assessed and priority given to situations representing immediate or urgent public health risks. In some circumstances it will be appropriate to follow the matter up at the next routine inspection.

## **7.6 Publicity**

The Service will seek to publicise successful initiatives which are of benefit and interest to the public. In particular the service will utilise the Council's social media channels to inform, advise and alert the public to issues pertaining to food safety. It will also publicise any prosecutions and sentencing of businesses who have broken the law and been taken to court by the Council.



1.2 Full Time Equivalents spread over positions highlighted in blue

### Structure of Housing and Community Services



# **Food Standards Agency assessment of the implementation of the FSA Recovery Plan by local authorities [England]**

**Epsom & Ewell Borough Council  
(6, 8, 9 June 2022)**

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## 1.0 Introduction

- 1.1 In response to the Covid19 pandemic, the Food Standards Agency (FSA) has maintained regular contact with local authorities (LAs) in England, Wales and N Ireland to provide them with guidance on the expected standards of delivery for food hygiene and food standards services. On 16 June 2021 LAs were contacted and provided details of the FSA's Recovery Plan guidance<sup>1</sup>. This Recovery Plan and associated Q&A sets out the FSA's guidance and advice to LAs for the period from 1 July 2021 to March 2023.
- 1.2 The FSA is delivering a programme of LA assessments between April and early July 2022, looking at the implementation of the Recovery Plan. The programme involves remote assessments of a selection of LAs in England to examine the arrangements put in place by LAs to enable them to implement the Recovery Plan guidance.
- 1.3 In particular, the assessments covered arrangements made in relation to the requirements of Phase 1 and any relevant elements of Phase 2 at the time of the assessments, including an assessment of forward planning for the roll out of any remaining elements of Phase 2 throughout 2022 and up to March 2023.
- 1.4 This is a report on the outcomes of the remote assessment conducted with **Epsom & Ewell Borough Council** between 6 and 9 June 2022. A flexible agenda was used allowing the LA to select assessment timeslots over the period to suit their workload.
- 1.5 Epsom & Ewell Borough Council was included in the Food Standards Agency's programme of assessments of LA food law enforcement services as part of a geographical mix and different types and responsibilities of LAs, and because it reported no significant concerns regarding the delivery of the Recovery Plan at the *FSA October 2021 Temperature Check Survey*.
- 1.6 The objectives of the assessment programme are;
- to gain assurance that LAs in England have implemented the guidance in the Recovery Plan and delivered relevant official controls in accordance with relevant legislation and statutory guidance, including the Food Law Code of Practice (FLCoP).
  - to identify and disseminate any areas of innovation or good practice
  - to establish how LAs had interpreted the Recovery Plan and to gather views on the Plan itself and

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<sup>1</sup> COVID-19 response - [Recovery Plan](#) setting out guidance and advice for local authorities on delivery of official food controls and related activities in the period 1 July 2021 to 2023/24.

- to highlight any emerging issues or concerns to inform any future amendments or changes to the Plan.

## 2.0 Executive Summary

- 2.1 The LA had implemented the guidance and met the appropriate milestones in the FSA Recovery Plan at the time of the assessment. Through discussions with officers about service planning and evidence provided during the assessment, it was clear that the LA was delivering official controls broadly in accordance with relevant legislation, including that of the FLCoP. Assessors were also able to verify the accuracy of the information provided to the FSA during the *October 2021 Temperature Check survey* along with that of the *LA end of year returns 2021-22*.
- 2.2 In line with FSA guidance, the LA had been able to move at a faster pace than the minimum requirements set out by the Recovery Plan. They were able to restart programmed food hygiene interventions during the summer of 2020 by re-employing a contractor. The LA also utilised funding to bolster their experienced core environmental health team with additional resources to deal with the increased service demands of Covid19. Consequently, the resource for reactive food safety work throughout the pandemic was maintained. The Service benefited from having a relatively small number of registered food businesses and a dedicated resource (Contractor) for programmed food hygiene interventions.
- 2.3 The LA found the FSA guidance prior to the Recovery Plan timely and helpful. The Recovery Plan itself was clear and its expectations reasonable, which aligned with the LA's capability and capacity during the pandemic.



### 3.0 Background

- 3.1 Since the summer of 2019, programmed food hygiene interventions have been allocated to a contractor because of historical LA recruitment issues (salaries and finding competent staff). The contractor was allocated programmed intervention work by the lead food officer. This work was allocated on a monthly basis in conjunction with a deadline for delivery. Prior to the pandemic the LA had a backlog of more than 10% overdue food hygiene interventions and had an action plan in place to address this matter. The action plan was on course to be delivered by end of March 2020, but when the pandemic hit priorities changed and the plan was unable to be completed.
- 3.2 The lead food officer (food hygiene) is a member of a core team of Environmental Health Officers (EHOs). The team is generally responsible for the delivery food hygiene controls and enforcing other aspects of public health such as anti-social behaviour, housing and environmental protection legislation.
- 3.3 At the beginning of the pandemic despite officers immediately adopting home working arrangements, the LA was able to maintain its operational capacity and presence. Officers desk numbers were diverted to mobile phones and along with email, these were the primary methods of communication. As the LA had yet to adopt Microsoft 365 it improvised by utilising other online platforms such as WhatsApp to conduct virtual staff meetings. Microsoft 365 was eventually adopted, enabling a more effective and efficient communication between staff members whilst home working.
- 3.4 Despite staff embracing home working arrangements, members of the public were still able to contact the Service during this period, by telephoning the LAs contact centre and by using the “contact us” or “report it” functions on the corporate website. Service requests were then generated and forwarded to the EHOs for action. The LA organised its services to ensure there was sufficient resources (Monday to Friday) to deal with any reactive activities and service requests concerning food hygiene controls.
- 3.5 At the start of the pandemic, programmed interventions immediately ceased. The contractor employed to conduct programmed food hygiene interventions was released and his contract terminated. All food hygiene work was then allocated to the core team of EHOs, who at the time were also dealing with an

additional Covid19 workload and their business as usual (BAU) duties. As the pandemic progressed, team members experienced in communicable disease were also dealing with “Track and Trace” referrals from county level and completing self-isolation checks within the community. Despite releasing the contractor and the additional workload, the LA was able to maintain a dedicated resource for any reactive food safety related work, in accordance with FSA guidance at the time.

- 3.6 A small number of remote interventions were attempted during the initial stage of the pandemic, but as restrictions began to ease, in person interventions were the preferred choice. The LA felt that remote visits were not beneficial in reducing the overall numbers of visits due on their Management Information System (MIS). During the summer of 2020 as establishments were permitted to reopen, the contractor was re-employed and programmed intervention work was reintroduced.
- 3.7 Containment Outbreak Management Funding (COMF) was allocated to the LA from county level (Surrey) for enforcement of relevant Covid 19 regulations and backfilling for any diverted staff. This funding was utilised by the LA to further resource its core environmental health team with an additional four (redeployed) members of staff who were employed as Covid Marshals.
- 3.8 The Covid Marshals assisted with Covid19 related queries on the high-street in addition to providing advice to businesses regarding social distancing, signage and leaflet drops. The LA also used the funding to employ a Covid19 enforcement officer contracted to 20-30 hours a week who was positioned within the core team.
- 3.9 In addition, the LA also received FSA funding for the prioritisation of new businesses which increased numbers of staff assisting with the planning and prioritisation of food hygiene work.
- 3.10 The LA found the FSA letters received via the smarter communications platform during the pandemic very useful. The information provided the LA with clarification and direction regarding official control activities.
- 3.11 The LAs MIS continued to be used during the pandemic to record any official control activities and risk rate food business as per FLCoP. During the pandemic the LA continued with its programmed intervention programme generated by their MIS and are now using it to deliver a programme of work to meet the Recovery Plan milestones. The LA also used their MIS to record Covid19 actions and service requests during the pandemic.

## 4.0 Delivering Against Expectations

### 4.1 Implementation of Phase 1 Requirements: Planning and Prioritisation

- 4.1.1 Covid19 hampered all work on the service planning arrangements for 2020-21 and 2021-22, as such this has very much had a knock-on effect with regards to the service planning for 2022-23. The Authority had been unable to update its previous documented Service Plan with details about the impact of the pandemic on the Service. The LA however confirmed that plans were now in place to update its service planning arrangements by the end of summer 2022, in line with current FSA guidance expectations.
- 4.1.2 In the summer of 2020, the Authority restarted its routine risk-based food hygiene intervention programme with programmed interventions being allocated to the contractor. This was done by the lead food officer using the LA MIS. Planning arrangements consisted of conversations between the Service Manager and Lead Food Officer. The LA had therefore not felt the need to produce a specific documented intervention plan to show how interventions would be delivered in accordance with the relevant milestones in the Recovery Plan. The re-introduction of the routine intervention programme in 2020 has enabled the LA to move at a faster pace than the current requirements of the Recovery Plan.
- 4.1.3 Work allocated to the contractor for completion is monitored on a weekly basis by the lead food officer. If the contractor is unable to deliver the programme of work to the agreed deadlines, contingencies have been put in place whereby the lead food officer will assist in the delivery of this work.
- 4.1.4 A prioritisation exercise for new businesses was completed by the LA using the FSA funding along with a modified version of the newly developed FSA Business Triage Form. The LA found this funding to be very helpful and was used to employ contact centre staff to undertake the prioritisation exercise with regards to new business registrations. The exercise consisted of contact centre staff telephoning new businesses in order to verify their registration information and prioritise them for interventions using a risk-based approach, in line with FLCoP requirements. The lead food officer produced training (video) for contact centre staff concerning the triaging and prioritisation of new business, helping to ensure the accuracy and consistency of this work.
- 4.1.5 For the period April 2021 to the end of March 2022, the LA received a total of 64 new food registrations, of which 13 were categorised as high risk (and received onsite interventions) and 51 as low risk.

## 4.2 Implementation of Phase 2 Requirements

- 4.2.1 All category A rated premises (two in total) had received an onsite intervention by March 2022 in line with the Recovery Plan milestone. These were subsequently re-risk rated as category B rated premises. The LA was currently on track to deliver interventions at all B rated premises by the end of June 2022. Based on the training records provided by the LA, interventions were carried out by authorised officers who had received relevant training commensurate with their enforcement activities.
- 4.2.2 Assessors verified a small sample of records and there was evidence that risk scores had been applied correctly. Food Business Operators (FBOs) had been informed of contraventions, best practice, required corrective actions and timescales for compliance in line with the FLCoP requirements.
- 4.2.3 The Food Hygiene Rating Scheme (FHRS) was implemented and remained in operation during the pandemic. Risk ratings were applied based on officer findings and communicated to the FBOs during the intervention. These scores were also monitored by the lead food officer for their accuracy and consistency.

## 4.3 Any Areas of Faster Progress with the Recovery Plan

- 4.3.1 The Recovery Plan encouraged LAs where possible to move at a faster pace in realigning with the intervention frequencies and other provisions set out in the FLCoP. The key milestone dates within the Recovery Plan, and Phase 2 in particular can be seen in Annex 1.
- 4.3.2 The LA was responsible for enforcement at approximately 500 food businesses. In accordance with FSA guidance, they had been able to move at a faster pace and are able to achieve all the remaining milestones in Phase 2 (subject to any further restrictions imposed due to Covid19).

#### 4.4 Ongoing Expectations: Sector Specific Controls and other Official Controls and Activities

4.4.1 Since the beginning of the pandemic, the FSA has provided LAs with guidance regarding ongoing expectations about sector specific official controls<sup>2</sup> and other official controls and activities in registered and approved establishments<sup>3</sup>. These ongoing expectations were placed on LAs before the Recovery Plan was issued, these continued to remain in place alongside the additional milestone requirements of the Recovery Plan:

- **Proactive Surveillance**

The LA confirmed proactive surveillance activities were carried out by officers during the pandemic. These activities included officers regularly travelling across the borough and identifying new businesses in addition to triaging any new complaint information. Partnership working with other departments such as Licensing, Police and Trading Standards at county level also helped to inform on the changing business landscape. The LA confirmed that although these activities were not routinely recorded, the MIS was updated as and when officers actioned official control activities resulting from proactive surveillance – such as interventions at new FBOs / updating FBO details etc.

- **Dealing with incidents, complaints and foodborne disease outbreak investigations**

The LAs policy on dealing with incidents, complaints and foodborne disease outbreak investigations did not change during the pandemic. It was confirmed that no incidents were required to be investigated during this period. The LA received a total of 38 food premises complaints and 15 food complaints between 2020 and the day of assessment, this was a small but insignificant increase on the previous year. Assessors were informed that all complaints had been prioritised and actioned whilst adopting a risk-based approach to public health.

Assessors checked a small sample of food complaints; records described the nature and details of the complaint and there was evidence of appropriate investigation and complainant feedback. Objective evidence demonstrated that

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<sup>2</sup> Table 1 in COVID-19 response: [guidance and advice to local authorities on delivery of official food and feed controls during the lockdown in England announced on 4 January; and issuing of Version 14A of the COVID-19 Local Authority Enforcement Q&A](#)

<sup>3</sup> Table 2 in COVID-19 response: [guidance and advice to local authorities on delivery of official food and feed controls during the lockdown in England announced on 4 January; and issuing of Version 14A of the COVID-19 Local Authority Enforcement Q&A](#)

the LA had taken appropriate corrective action to address the complaints and mitigate any further risks to public health.

- **Sampling**

The Sampling Policy also remained in place and did not change during the pandemic. Proactive sampling was not undertaken during the pandemic, however the LA is committed to restarting its proactive sampling activities in due course in line with their sampling policy. Although the capacity for taking reactive samples remained in place, no reactive sampling was required during the pandemic.

- **Enforcement**

The LA had an enforcement policy in place which was in line with centrally issued guidance and had been approved appropriately. Although the policy had remained in place throughout the pandemic, the LA had not needed to carry out any formal enforcement activities to achieve business compliance. The LA did however issue a total number of 26 written warnings between April 21 and March 22 in order to address contraventions found during inspections and to ensure compliance in these businesses.

- **Product specific legislative requirements**

The LA confirmed they had no approved establishments within their area or other sector specific controls that needed to be delivered during the pandemic.

## **5.0 Monitoring**

- 5.1 The LA had an internal monitoring procedure, but since the beginning of the pandemic this had not been fully implemented. Despite not completing any shadowing visits with officers, the lead food officer was regularly monitoring the FHRS uploads from the contractor, ensuring the accuracy and consistency of ratings. Monitoring of the triaging and prioritisation of new business by newly redeployed staff was also being undertaken. Programmed interventions issued to the contractor were also being monitored to ensure timely delivery against agreed deadlines, in line with the Recovery Plan milestones.
- 5.2 Given the circumstances, assessors were satisfied with the LAs approach to monitoring during the height of the pandemic but did discuss the benefits of reviewing their approach moving forward.

## 6.0 Conclusions

- 6.1 Assessors were able to confirm that the LAs responses to the *FSA October 2021 Temperature Check survey* were accurate along with that of the *LA end of year returns 2021-22*.
- 6.2 Based on discussions with officers and a review of evidence provided, it is clear that the LA is delivering the Recovery Plan in accordance with the guidance and FSA expectations. They have also been able to move at a faster pace than the minimum requirements of the Recovery Plan.
- 6.3 The LA confirmed that at the time of assessment and with the use of the contractor, the Service is resourced to a satisfactory standard and expects to deliver the remaining milestones of the Recovery Plan (subject to any future changes as a result of the pandemic)
- 6.4 Food core officer training during the pandemic was delivered remotely and met the FLCoP requirements. Internal training provided by the Lead Food Officer (video) concerning the triaging and prioritisation of new business for new redeployed staff was noted as good practice by the Assessors.
- 6.5 Moving forward, assessors suggested that the Service could be strengthened further by:
- Developing a documented post pandemic service plan in line with centrally issued guidance, approved by relevant members or senior management, including details of the interventions to be delivered throughout the year and an estimate of the resources required to deliver them.
  - Re-introducing a suitable proactive sampling programme as soon as possible in line with the LA sampling policy, building on the LAs risk-based approach for the delivery of official controls.
  - Re- introduce a risk based and proportionate internal monitoring approach across the whole of its Food Safety Service in line with LA policy.

**Assessment Team:** Andrew Webb (Lead Assessor)  
Aranzazu Sanchez (Assessor)

ANNEX 1- Key milestone dates within the recovery plan







## **Epsom & Ewell Borough Council Health and Safety Intervention Plan 2023-2024**

Epsom & Ewell Borough Council has a duty to enforce the Health and Safety at Work etc Act 1974 and associated regulations within its district. The Council has enforcement responsibilities in many areas including retail units, offices, warehousing, catering premises, leisure and entertainment premises, consumer services such as beauty parlours and tattooists and tyre and exhaust fitters - the vast majority of areas the public has access to.

The primary objective of the health and safety service placed within the Environmental Health Service at Epsom & Ewell Borough Council is to protect employees and the public from hazards arising from work activities and to seek improvement in working conditions in terms of health, safety and welfare.

This intervention plan sets out the overall aim of the service and identifies specific areas where we will prioritise our efforts in line with the better regulation concepts of modern regulatory enforcement.

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## Service aim and objectives

The primary objective of the health and safety service placed within the Environmental Health Team at Epsom & Ewell Borough Council is to promote health and protect employees and the public from hazards arising from work activities and to seek improvement in working conditions in terms of health, safety and welfare through advisory and enforcement activities.

We will do this by both proactive and reactive means.

## Key Delivery Priorities

In 2013 changes in government guidance and direction caused the service to review its method of operation. For example, The Löfstedt review<sup>1</sup>, the Department for Work and Pensions Ministerial Statement on Good Health and Safety<sup>2</sup> the Young Report<sup>3</sup> and the Health and Safety Executive/Local Government Association guidance on reduced proactive inspections<sup>4</sup> is directing enforcement authorities to carry out fewer overall inspections and utilise greater targeting of proactive interventions. The result of these changes meant that very few routine inspections are carried out in Epsom & Ewell, and instead the Council concentrates on a project based approach taking into account national priorities and local initiatives where there is evidence that intervention is warranted.

The key delivery priorities are as follows

- Execution of proactive inspections of businesses and undertakings representing particularly high risk or poor standards.
- Investigating accidents and incidents in line with the Health and Safety Executive's (HSE) incident selection criteria which has been adopted for use locally.
- Responding to service requests in line with the Council's expectations and incident selection criteria.

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<sup>1</sup> Reclaiming health and safety for all: An independent review of health and safety legislation  
Professor Ragnar E Löfstedt November 2011 <https://www.gov.uk/government/publications/reclaiming-health-and-safety-for-all-lofstedt-report>

<sup>2</sup> Good Health and Safety, Good for Everyone The next steps in the Government's plans for reform of the health and safety system in Britain 21 March 2011 [www.dwp.gov.uk/docs/good-health-and-safety.pdf](http://www.dwp.gov.uk/docs/good-health-and-safety.pdf)

<sup>3</sup> Common Sense Common Safety [www.hse.gov.uk/aboutus/commonsense/index.htm](http://www.hse.gov.uk/aboutus/commonsense/index.htm)

<sup>4</sup> Joint guidance for reduced proactive inspections [www.hse.gov.uk/lau/pdfs/reduced-proactive-inspections.pdf](http://www.hse.gov.uk/lau/pdfs/reduced-proactive-inspections.pdf)

## Proposed 2023-2024 interventions

In 2023-2024 the service plans to deliver the following programme of interventions.

- Planned in person focused inspections based around the identified national priorities of electrical safety in outdoor environments and the completion of the gas safety in commercial kitchens project.
- Identification and resolution of matters of evident concern identified during interventions for other regulatory reasons.
- Reactive responses to complaints, accidents and requests for assistance from business.

## Measurable Targets

- We will deliver the identified priorities as planned during the year.
- We will not investigate all accidents or incidents reported to us. Instead we aim to investigate 100% of those accidents which meet the incident investigation criteria.
- We will respond to matters of evident concern highlighted during our work with business and in the community at the time they are identified or as soon as possible afterwards.

## Review of the years 2020-2023

### Proactive

Much of the work in the 2020-2023 period related to enforcement of various COVID-19 related provisions including business closure, restrictions and acting as a point of advice for business and consumers. The service took part in three Safety Advisory Groups (SAG) around the running of events during the pandemic and made visits to check compliance as well as two separate SAGS associated with christmas, spring and fireworks events. Additionally the service produced a social media video specifically for close contact businesses which attracted national attention: <https://youtu.be/TB3nP8tRCFc>.

From February 2023 as the COVID-19 work diminished and the service was able to fill a long term vacancy, 17 proactive visits were made in support of the gas safety in catering premises covering the risks of explosion and carbon monoxide exposure to staff and residential occupiers in attached dwellings.

### Reactive

The service undertook 127 COVID-19 in person contact tracing visits and dealt with 230 individual enquiries and complaints associated with the COVID-19 restrictions. Additionally 91 accidents were reported under the RIDDOR system including a fatality which was found not to be as a result of a work activity and a further serious injury to a member of staff which is still under investigation.

### Formal action

The service successfully concluded a prosecution of a duty holder for failures associated with a serious accident to a member of the public. No improvement or prohibitions were issued in this timeframe.