

Appendix 1

Consultation Responses and Comments.

Comments on Draft Strategy	No.	Responses
Good	15	
Common Sense / sensible	38	
Positive	13	
Impressed with progress by LDC since 2002	1	
Right Direction	4	
Laudable	20	
Responsible attitude	27	
Collect Compostable Waste (sometimes weekly was specified and sometimes in vessel composting was specified)	182	See separate sheet appended to Strategy document as Appendix 2 to the main strategy document.
Do not incinerate (often included the concept that Lewes District Council have the power to stop the County Council moving forward with plans to incinerate)	155	Lewes District Council has made objections to incineration through the Local Waste Planning system. If Lewes District Council recycled as much as the top performing authority in the UK there would still be residual waste and the disposal authority would still be the authority with the responsibility to dispose of it.
Typo	91	Corrected (3 separate typos identified).
Practical steps needed / more urgent commitment needed.	41	Practical steps have been demonstrated by the new kerbside collection scheme, extra materials, over 100 bring sites, running a Materials Recycling Facility for the last 13 years, the Scrap Store and all of the other numerous partnerships and activities. The 'urgency' aspect is subjective and the Council has moved to meet its targets with sustainability at the top of the agenda. If urgency relates to green waste collection see comments above and appended separately.
Very impressed at what you are trying to do and your high level of commitment.	1	
Commercial recycling should be considered	24	The collection authority has no mandate to recycle trade waste. The Council has explored ways of facilitating this and has recently submitted a bid to SEEDA for

		funding exactly such a scheme, which was not responded to. The Council also provides a fact sheet on commercial waste recycling and who can be contacted to do it. There are very significant complications and costs involved when the Council considers commercial recycling and the taxpayer does not pay tax to support commercial activities (Commercial Rates do not include payment for waste management).
Explain zero waste and the requirement to separate material and the effect that has on residual waste.	175	Explanation added. This has also been referenced in the Strategy document to the 2002 Cabinet Report on the subject that is available on the Council's website.
Take advantage of increased awareness / participation	67	This has been at the forefront of the educational programmes that have been carried out and the participation rates are high for a voluntary scheme. Any suggestions will be welcome..
Willing to pay extra (includes 1 commercial)	17	This is not necessarily true of all residents.
Manufacturers to take responsibility for batteries / council to collect batteries	33	See separate sheet appended to Strategy document as Appendix 2 to the main strategy document.
Should recycle tetrapacks	53	See separate sheet appended to Strategy document as Appendix 2 to the main strategy document.
Give composters free of charge	1	The cost of provision to the remaining households in the District is £279,768 and this level of budget is not available.
Links to global warming are supported	1	
Support increasing range of items	1	
Support collection of textiles.	1	
Stop junk mail		Promoted as part of waste avoidance campaign in action plan 1.
Stop secondary packaging	2	Promoted as part of smart shopping campaign in action plan 1
Very pleased with the service you offer.	1	
Why not include Parish Councils as partners in some of your action plans.	1	We would welcome any input to assist our efforts from any Town / Parish Councils. We do already work with some Town / Parish

		Councils, all Town and Parish Councils have been consulted on this document and we welcome any further feedback from Towns and Parishes.
Unfair for taxpayers to pay for garden waste collection	18	This point is noted. Taxpayers do often pay for services they do not use at any given time for the benefit of the community as a whole e.g., parks and gardens, education, social services, the Fire & Rescue Service. Garden waste collection however, is not being recommended.
The Council could provide trolleys to help people who have difficulty or don't like the look of boxes outside their houses.	1	The Council already provides assisted collections for residents that are unable to carry their boxes. The very significant expense of providing such devices is not justified because people do not like the look of them.
Section 6.2.11 Page 33 is confusing	3	This has been clarified by the addition of fact sheets as Appendix 2.
Do cardboard on kerbside	7	We are unable to fit cardboard on current vehicles so collection would require the purchase and running of a separate fleet of vehicles. The cost of this is considered to be too high when compared with the achievability of drop-off sites for cardboard. The collection of cardboard however, will be reviewed with the consideration of collection of kitchen waste. A fact sheet has been added as Appendix 2 of the Strategy document.
Collect electrical items.	1	This is intended in Action Plan 5 for small electrical items. Large items can be collected at a charge through the bulky waste collection system. These materials are recycled. Otherwise residents can take their own large items directly to a Household Waste Recycling Site free of charge. There are three of these operated by East Sussex County Council in the District at Newhaven, Seaford and Lewes.
Calendars very good idea.	1	These will be continued where

		budget is available.
Weekly collection of kitchen and green waste.	2	See sheet on green waste collection appended to strategy as Appendix 2 and also review comments regarding kitchen waste.
Can we support community anaerobic digesters?	1	We support individual anaerobic digesters through the subsidised Green Cone scheme. We would support Community anaerobic digesters but the disposal responsibility lies with the disposal authority East Sussex County Council. Any community projects that wish to bid for external funding will be assisted through the Council's staff and would be welcomed and supported.
Can we offer economic incentives to recycle more?	1	Council tax reductions can not be given for recycling.
Must be easy and practical for people.	1	This is facilitated as much as possible by the Council.
Suggest TV and radio and regular flyers.	1	WRAP (The Waste and Resources Action Programme) are carrying out national TV and radio campaigns on recycling. This Council aligns its promotional campaigns with the national campaign as this form of media exposure is outside the financial means of this authority and best provided on a national scale with the resulting economies that brings.
Need more repair and reuse but it isn't easy and often not cost effective.	1	Action Plan 1 aims to encourage and facilitate this.
Home composting felt to be unsuitable in urban locations.	1	This is not understood, this authority and many others have sold very many home composters in urban areas.
Would prefer to see higher recycling rates but note good performance on waste per head. Welcome much of what is in the action plan.	1	
45% by 2015 is not demanding enough.	1	This is the aim with the constraint of resource available through taxation.
Support 100% kerbside	2	The Council aims to achieve 100% participation but this is dependent on co-operation and resources.

Find box design a little awkward and would welcome improved design.	1	The Council would welcome further feedback.
Support purchasing waste from community groups	1	
Support increasing doorstep collection	2	
Support more education of the public	3	Action Plans 1 - 5
Support compulsory recycling	4	Action Plan 4
Collect wood	4	We will continue to monitor this.
Collect polystyrene	1	It is uneconomic to recycle this and we recommend taking it back to the supplier.
Pie chart on page 3 difficult to read.	2	This has been improved.
Titles box needs to include the tonnages as detailed in the chart.	1	The chart has been amended.
Confusing document structure	3	This has been reviewed and disagreed. No changes made.
Overall a compact concise document, except for page numbering (in Executive Summary).	1	Page numbers added to Executive Summary.
Need more targets for waste growth and reliable outlets for recyclates, at town / parish level.	1	There are targets for waste growth and we have aimed for zero growth. The second part of this is not understood and we would welcome further information.
Couldn't Planning System be used to encourage growth in sustainable waste facilities.	1	The planning system seeks to provide new ,and more sustainable waste facilities, in Planning Policy Statement 10 " Planning for sustainable waste management July 2005
BPEO could mean cost-effective. Needs cost benefit for Councillors analyses.	1	Councillors are provided with financial information. More information on finances has been added to the strategy including net costs of services and the affect of the Action Plans as a net cost expressed as a cost per head of population.
Support County wide collection for biodegradable waste	1	Seeking clarification of this point. Collection of green waste is covered in the appended fact sheets.
Should be long term targets	1	Zero waste is the long term target. This five year strategy will be reviewed and renewed as necessary.
Link to the South East Regional Strategy	1	This document is linked to the Joint East Sussex Waste Strategy that is in draft which in turn is linked to the Regional Strategy.
No mention that the kerbside recyclate has a bearing on residual collection.	1	This is considered to be implicit within the document.

Table 9 unreliable and underestimates organic material.	1	This is taken from actual sampling in the Brighton and Hove City study. These studies are known to only be estimates.
Charge garden waste per bag and compost it.	1	There is insufficient charged garden waste to warrant a separate collection.
Alternate fortnightly residual collection	1	This has been discounted with the discounting of green waste collection. It will be reviewed again with a review of kitchen waste in the next year.
Research other local authorities best performance	1	This is continuous.
Improve service to flats	1	A new Action Plan 6 has been drafted.
Page 5 item K delete the words “disposed of direct to landfill”.	1	Amended. Words have been deleted.
Page 16 penultimate paragraph update re LATS.	1	Amended.
Can we recycle more plastics than bottles ?	2	This is under constant review and we are currently looking at markets. We currently only collect what we know that we have a market for and that is bottles. A separate fact sheet has been provided on this subject in Appendix 2 of the document.
How do I dispose of aerosols?	1	With cans at kerbside or in recycling centres.
Follow up on households who produce excess waste	1	This may be possible with the new Community Wardens scheme and will be investigated.
Charge people who do not recycle	1	This is compulsory recycling and is in Action Plan 4
State if document is printed on recycled paper or sustainably sourced paper	1	Amended.
Unclear who is the target audience	1	This is a Draft Strategy for Lewes District Council therefore the aim is to use it as a working document for management purposes, a document to be audited against by , for example the Audit Commission, as well as an informative document for the general public.
More careful proof reading needed	3	This has been arranged.
2.2 is vapid	1	There are a great many documents that are available on request or for view at the Community Recycling Centre. To keep this main

		document manageable they are necessarily not all included. A systematic Options Appraisal with full documentation is available in the Joint Strategy for all authorities across East Sussex currently in draft.
4.3 and fig 4 page 19, need effect on policy not detailed list.	1	This diagram is a representation of the factors affecting the policy. There is insufficient room in this document to describe all of these in detail and examples are given. The legislation can be found and is available on the internet or through libraries.
5.3 is an exhaustive list of recycling initiatives with no attempt made to distinguish between their significance – surely they can not all be key actions.	1	These activities are all carried out as the efforts for waste reduction are the result of a sum of many different areas of work. The words “key actions” have been deleted.
7.7 re abandoned vehicles, is different in tone, reciting the Regulations as though the paragraph were the draft for an official leaflet.	1	This has been amended and cut down and a reference given to the information.
7 re vehicle purchase is repeated in 9.9 – but surely the detail of this information is of greater relevance to Councilors. What message is it intended to convey to us, the wider audience / general public?	1	The information given is to demonstrate that the Council is modernising and making its services more efficient and that through joint procurement that the Council is working to try to get the best value for the taxpayer’s money. This is exceedingly relevant to Council Taxpayers to see that the Council is trying to be economic with the public money that it receives.
4.1 refers to Table 1 (Targets for reduction of waste to landfill) but perhaps this should be table 2, since table 1 on page 7 merely illustrates the need to recycle.	1	Amended all table numbers.
4.2 Table 3 omits the financial year 04 / 05 but there is reference to this year later (section 5.1).	1	National recycling targets were not set for the year 2004 / 05. We still do have results for those years and section 5.1 refers to waste growth not recycling rates.
8.6 Smart Shopping. After what has been written in sections 5.2, 5.4 and table 4, surely the smart shopper should not avoid refills and loose / non packaged items?	1	This typo has been corrected.
Difficult to equate Zero Waste with 50% recycling target.	1	Zero Waste is an aspirational goal and the timeframe is set for 2020.

		The 50% target is currently an LDC target set for 2015. The zero waste target is conditional on a great many actions that are not deliverable by the District Councils and also rely on Central Government legislation, manufacturers and users of packaging, development of recycling infrastructure and markets and consumers. The Council supports these goals that are a part of the Zero Waste Charter.
The document barely mentions incineration. We believe that LDC should review its policies and recognize that there are certain items that do not lend themselves to recycling. Landfill is not an option. We recommend the waste hierarchy.	1	The document deals with waste collection authority activities and is not intended to deal with the Waste Disposal Authority methods. It necessarily deals with reducing the amount of waste that goes to the Waste Disposal Authority (WDA). The Council does recognize that all materials can not be recycled. Landfill however is an option. The Waste Hierarchy is one of the Council's fundamental principles.
We believe that compulsion is unnecessary and may antagonize residents.	2	Comments noted.
Should have local bring points for rural areas not electric vehicles.	1	The Council aims to provide the same service to all of its residents as regards kerbside recycling where it is feasible and cost-effective to do so.
Educate and trust might be a better policy as regards recycling.	1	The Council has had and continues to have an extensive education programme. The Council has spent more than 10 years educating and carrying out promotional work with many partners.
Explain "small WEE"	1	Amended, an explanation is included.
Key Principles [p.4] There is confusion between policies and principles. Policy is developed in accordance with the key principles.	1	There is not confusion. It is correct that policy builds on principles, nevertheless policy A of the Council's Strategy states which principles, as policy, which the Council works to.
It is unclear if the key principles are intended		References will be included. The

<p>to be a hierarchy, or how they interact. No reference is made to the legislation or government guidance from which the principles derive.</p> <p>For example, the Sustainability principle needs to be located within UK Sustainable Development policy as expressed in ‘Securing the Future’ and PPS1. Further elaboration would seek to identify those aspects of Sustainable development that waste proposals should maximise their contribution towards.</p> <p>Thus the impact of proposals upon climate change issues should require a high standard of proof from any infrastructure proposal.</p>		<p>principles are explained in section 3. There is no intention for the Council to set a hierarchy of principles.</p> <p>Sustainability is defined and in the context of the Rio Declaration of 1992. This is demonstrated in the Waste Hierarchy which reflects the principles contained within sustainability as a concept.</p> <p>This would warrant a full lifecycle analysis of all of the Council’s activities. One life cycle analysis of aluminum recycling has taken six years. This authority recycles aluminium, steel, several polymers of plastics, papers, cardboard, shoes, textiles, stamps, Wellington boots, mobile phones, glass in three colours etc.</p> <p>These comments refer to an infrastructure proposal, there is no such proposal in this document. If this comment relates to waste disposal methods that is within the purview of the Waste Disposal Authority and not Lewes District Council as the Waste Collection Authority.</p>
<p>D. No target for reduction is given. Without that, this policy is meaningless. A target is later given in 5.2 D, this should be included here. It should also state that this is in relation to residual household waste per kg/head.</p>	<p>1</p>	<p>This is a statement of policies the targets are set out in other parts of the document.</p>
<p>F. No distinction is made between increasing recycling proportions and ‘diversion from landfill’, which includes incineration.</p>	<p>1</p>	<p>Please see the Waste Hierarchy set out in policy A and described in section 3.</p>
<p>L. References sustainable development in terms of climate change via the ‘Nottingham Declaration’. This is a voluntary agreement rather than a statutory requirement. See Sustainability discussion above.</p>	<p>1</p>	<p>The Council is aware of this and has adopted the Nottingham declaration as policy even though it is not statutory.</p>

<p>3.1 A</p> <p>1; The waste hierarchy quoted has no status in EU or UK planning law, policy or guidance. It should be replaced by the version in the current UK strategy 'Waste Strategy 2000' presently out to consultation for revision in 2006.</p>		<p>The included version of the waste hierarchy does reflect that within the UK consultation document but is further elaborated on as described by Robin Murray in his book Creating Wealth from Waste. This is a more detailed version of that in the consultation paper as it differentiates between disposal options.</p>
<p>2; BPEO has been removed by UK government under PPS10. Delete this section and replace with Sustainability Appraisal under Strategic Environmental Assessment, which comes into effect this summer.</p>	1	<p>This is not appropriate. The SEA is a specific management tool to be used to determine a specific objective that is reflected in the documents from which it derives. BPEO is a principle that the Council still believes in as a guiding principle for its waste management activities. The Council aims to utilise the Best Practical Environmental Option in carrying out its waste activities.</p>
<p>3; The Proximity principle has been redefined to accord with the EU Waste Framework Directive. It now refers to waste being managed 'at the nearest suitable installation'. This no longer requires waste to be managed as close as possible to the source of arisings. This point now needs to be captured under Sustainable development criteria.</p>	1	<p>Whilst this has been amended at EU Waste Framework Directive level, this Council has taken the view that the original definition is appropriate where feasible and economically desirable. This authority would wish to see waste managed where it is produced but recognising that on occasion waste will need to be transported to be dealt with, particularly when sending recycle to specialized markets. This will be made clear in the document.</p>
<p>4.2 Targets.</p> <p>This section needs to place mid and long term targets alongside those in the B/H+ESCC Waste Local Plan, the SE Regional Strategy [soon to become the SE Plan], and [helpfully] those in the consultation draft of Waste Strategy 2006, published by Defra.</p> <p>Delete the historical targets as these are of no continuing relevance. Allowances under LATS have now been finalised, and should</p>	1	<p>Added.</p> <p>Amended for LATS. The very small space taken up by the historical target is relevant in</p>

be included.		terms of setting the context of improvements made.
4.3 The proposed EU Biowaste Directive has been deferred, and may re-emerge in amended form under the Thematic Strategies.	1	Noted in document.
5.4 This section fails to mention that the range of materials collection at kerbside has a critical impact on wastes presenting in the residual collection. This is well demonstrated in the literature, and is best considered in terms of the removal of organic materials, particularly kitchen wastes, from residuals to kerbside. This single act could increase the recycling performance of LDC by up to 10%, and providing a composting outlet is secured, it is the most important single change to the system to achieve large gains for low additional cost. Authorities that follow this step tend to see increases in collection of other materials at the same time. Transformational shift that the 30% recycling/composting target offers is accelerated if the opportunity to rebalance collection systems is taken at the same time. Moving to fortnightly alternate collection of recycling and residuals, with limits on the capacity accepted by residual collections, acts to divert materials to the recycling collection. Without including organic collections, it is likely that dry recycling will bottom out at about 30%. LDC will fail to deliver its own targets for 2015 and beyond. The objective is to try to reduce the overall volume of waste, while capturing a higher proportion and tonnage within the recycling stream. Thus the recycling service should become the 'core service' by 2010, with residual collection charged and selectively replaced as the 'easy option'.	1	This has been included. See comments regarding green waste collections above and in the fact sheet added as appendix 2 to the strategy. The balance of materials must equate to a near 50% reduction in waste currently produced to enable a fortnightly collection, otherwise the Council has to expend extremely significant sums to purchase new vehicles, crews, running costs and one –off change management costs. The recycling rate is not at 50%. The Council is considering this policy to achieve its goals and exceed Government targets and goes to 2010 / 11. No actions are ruled out after the Council has run this Strategy work and there will be continual review of the strategy.

<p>6.2.2 Kerbside.</p> <p>A target is given for an average participation rate is given [72%], but no expected 'set-out' rate is adduced. It is not possible to assess the overall success of the scheme without some understanding of the extent to which participants contribute.</p> <p>This section mentions extending collections to include materials such as Tetrapaks. As these are a very small proportion of waste, it will add little to recycling rates to include these. Consideration needs to be given to the sustainability impacts of recycling certain materials. Transport to Fife, and non-recovery of the aluminium liner from these products, which return as low grade paper products, should be factored in. This is affirmed in 6.2.11, yet it appears here as an option!</p> <p>6.2.6 Composting.</p> <p>While the opening statement that home composting is preferred is correct, it does not help greatly with the primary aim of diverting organic materials from residuals to kerbside. An increase in the use of home composting is not a replacement for kerbside collection, it is an addition to it.</p>	<p>1</p>	<p>The average set-out rate has been included.</p> <p>This has been considered and it is still an option because the markets are continually changing as is the technology for separating the wastes. A fact sheet has been prepared and placed on the Council's web site and will be appended to the strategy Appendix 2.</p> <p>The primary aim is not to divert residuals to kerbside. In line with the waste hierarchy the primary aim is to reduce waste. This can be achieved by treating the waste at source by home composting then the taxpayer does not need to pay for collection and the environmental affects of collection are negated. A fact sheet has been added on this matter too at Appendix 2.</p>
<p>There is some confusion over the extent of the biodegradable fraction in the household waste stream. Appendix 1 [Action Plan 1] quantifies the extent of the organic resource as 25% of current disposal to landfill, equating to 8000 tonnes per annum or a 10% increase in the recycling figure for LDC. This figure is derived from the analysis of waste conducted by Brighton and Hove and included as Table 8. The organic percentage</p>	<p>1</p>	<p>A second survey has been undertaken locally and the results received in late 2005. This survey was supported by DEFRA and carried out by Network Recycling and gives similar results to the Brighton survey for Lewes District . More care needs to be taken in trying to fit national statistics to local circumstances</p>

<p>given here is low in comparison to work done by Julian Parfitt of WRAP for the advisory Strategy Unit report to government '<i>Waste Not, Want Not</i>'. This research gives a national figure of 16.4% garden waste and 22.2% kitchen waste in the average bin. Care has to be exercised with local surveys, and there is no indication that the Brighton work quoted represents a 'year round' figure. Demographic characteristics also influence the organic percentage in residuals. I would regard the figures given in Table 9 for the LDC area as unsafe, and an underestimate of the potential organic fraction.</p> <p>Notwithstanding the above, it is clear that the question is therefore how to collect this material, the low hanging fruit, and manage it to best economic and environmental effect.</p>		<p>where local policies may vary the local results very significantly. Lewes District Council has a policy of charging for green waste collection and has provided subsidized composters / digesters to more than one quarter of its population's households and that keeps garden waste out of the waste stream. The green waste in the waste stream is comparatively low and that would be expected. It is more likely that because of the local policies that the national figures do not reflect the local results in this area. This should be noted in the context of BVPI 84 where Lewes District residents produce some of the lowest waste per head figures in the country.</p>
<p>There are limits to public engagement with home composting, and the challenge is to capture the organic resource from those who are disinclined to compost themselves, but are happy to co-operate with the council to compost on their behalf. Adding kitchen wastes to the kerbside scheme, with the establishment of composting facilities, would provide an outlet for a large proportion of materials currently in residual wastes.</p>	1	<p>Currently there is no infrastructure for dealing with kitchen waste composting (in vessel / anaerobic digestion) though this may be forthcoming through the Waste Disposal Authority's disposal contract in the future. The Council will undertake to review this subject over the next year and will ask ROTATE if they will be able to fund / carryout a review.</p>
<p>As collection authority, LDC collects biodegradable material in street sweepings [eg.leaves]. These could be composted.</p>	1	<p>The Council has already looked into this and there is no way of composting the leaves locally as the composting facilities will not accept the material because of the litter contamination. This has been referred once again to East Sussex County Council.</p>
<p>Action Plan 3 looks to expand cardboard recycling via the Bring sites. A low increment [1.2%] to the recycling figure is thought to emerge. The real question is what is the expected continuing presence of potentially recyclable cardboard in the 'black bag' system, and could this best be removed by inclusion in kerbside.</p>	1	<p>This will be reviewed with the issue of kitchen waste above as it is possible that both could be collected together. Currently the collection of cardboard at the kerbside is not feasible on the current vehicles as they are full to capacity (already collecting more than 6 types of material). The cost of an entire new collection service is not justified by the increase rates from cardboard collection</p>

<p>It should be noted that materials such as cardboard can be composted as well as recycled. Given the high % of cardboard in trade waste, potential synergies between household and commercial streams for this material should be explored. The document does not consider the status of commercial municipal waste, and the role it might play.</p>		<p>alone at this time.</p> <p>The collection authority has no mandate to recycle trade waste. The Council has explored ways of facilitating this and has recently submitted a bid to SEEDA for funding exactly such a scheme, which was not responded to. The Council also provides a fact sheet on commercial waste recycling and who can be contacted to do it. There are very significant complications and costs involved when the Council considers commercial recycling and the taxpayer does not pay tax to support commercial activities (Commercial Rates do not include payment for waste management). Again the District Council is not the responsible authority for disposal and facilities and infrastructure is not available to dispose of such waste.</p>
<p>7.1 Garden waste.</p> <p>The current policy of collecting garden waste for a charge is supported, but this material needs to be weighed and its management audited. No indication of how this material is managed is offered, so it is unclear if this material is being treated in a way that allows it to be counted towards LDC recycling targets. There is little point in separate collection of green waste, if it is then sent to landfill.</p> <p>The claim that composting this at home is the most sustainable solution is not relevant. Garden waste can include woody material unsuited to both the scale and process of many home composting systems. Indeed, inappropriate attempts to manage the waste in this way can discourage people from using their system to best effect. The alternative of LDC accepting this material at a charge should allow it to be shredded and professionally managed.</p>	<p>1</p>	<p>On average the Council was requested to pick up green waste bags from residents 5 times per month in the financial year 2005 / 06. The logistics and expenditure required to lay on a separate collection and / or weigh this waste are not cost effective or value for money.</p> <p>Woody material is by far a minority of such waste and this can be dealt with through the Household Waste Recycling Sites or a charged collection or chipping at home.</p>

<p>A ban on collecting garden refuse as a part of the residual round may help to keep this material out of the ‘black bag’ and divert it from landfill.</p> <p>7.3 Hazardous waste.</p> <p>The type of waste classified as hazardous has changed recently, and this section needs to define hazardous waste accordingly and describe the appropriate management route.</p>		<p>The Council is not allowed to ‘ban’ the collection of this waste as it has a statutory duty to collect. The Council does however ban the waste without payment which it is entitled to do under the law. This is a significant disincentive to place green waste in the black bags as is reflected by the waste survey results showing very low levels of garden waste in Lewes’s waste stream and the low number of requests to collect at a charge.</p> <p>Amended.</p>
<p>8.2 Waste Reduction.</p> <p>The aim of reducing waste in the next 5 years to increase the recycling rate by 3% to 7% is given. To achieve this, the waste that must be reduced is that which is in the ‘black bag’, and not currently recycled. In other words, reducing waste can also reduce the recycling rate if the waste prevented entering the system is material that could [or would] have been recycled.</p> <p>This implies the LDC recycling strategy relies upon the ‘right’ materials being taken out in order for targets to be attained. This is a dangerous assumption as it is beyond the control of LDC to ensure that reductions arising from wider changes in the production economy, such as reducing packaging materials, will be reflected in the correct proportions in the residual collection.</p>	<p>1</p>	<p>That is true but if the waste that is recycled is reduced too it is still positive in that it moves the management of waste up the waste hierarchy. This is a good thing as it would reduce the waste per head although it may reduce the recycling rate (to a lesser degree) too.</p> <p>The ‘right’ materials will include all material that would otherwise be put in black bags. The entire system of waste management in this respect is beyond the control of Lewes District Council and that includes recycling levels as new materials may be invented, shifts in packaging patterns are predicted. The Council has to make its policies on the basis of the information available. The current collection systems up and down the country are dependent on the right materials being put into the system hence the very specific waste streams that can be recycled.</p>

<p>It would be preferable to deliver this reduction target, which is supported, by the mechanism of attributed policy choices in the collection system. The promotional campaign is a welcome ‘broad brush’ tool to raise awareness and consolidate the other initiatives the council support, but does not in itself guarantee a specific outcome.</p>		<p>Clarification of this point is being sought. Very little guarantees an outcome, however the ‘broad brush tool’ referred to has resulted in actual waste reductions and increases in recycling rates. This is all referenced in the nwr (national waste and recycling forum) document that formed the basis of the projections.</p>
<p>8.8 General Recycling Promotion.</p> <p>The materials to be added to kerbside will offer very low returns in terms of % increase of recyclables. Only cardboard is a substantial fraction of the residual stream. Batteries and electronics should be offered as options because of legislative liabilities, although the economics of collection may be marginal.</p> <p>Tetrapaks were previously rejected on sustainability grounds. Using the Parfitt figures of 0.4% cartons in the residual, a recycling scheme with a 72% participation rate and a 72% set out rate, would deliver an increase in the total recycling figure of about 0.2%.</p>	<p>1</p>	<p>Every increase in recycling is considered positive no matter how small. The economics depend on economies of scale and what could be fitted into existing systems. Batteries and small electronics could be fitted into the existing scheme. There are some other considerations and a fact sheet is added to the strategy document on the matter of batteries and other materials.</p> <p>Every increase in recycling is considered positive no matter how small. The economics depend on economies of scale and what could be fitted into existing systems. Tetrapaks could possibly be fitted into the existing scheme and the Council is keeping an eye to the markets, processing and sustainability of this method before committing to it. A fact sheet is added to the strategy document on the matter of tetrapaks and other materials.</p>
<p>10.1 Future plans.</p> <p>The dry recycling proposals of the council will deliver the 27% target by 2006 only if the range of materials is fully comprehensive and district wide. At current performance standards, this target will not be met. It may be delivered by improved service delivery, but will then stall short of stated ambitions.</p>	<p>1</p>	<p>The target may not be met in time due to the lack of drop-off points for certain rounds and the delays in getting kerbside glass collection on all of the rounds. Progress is still being made in the area and the resources are still available.</p>

<p>Assuming improved service provision, progress beyond the 30% barrier will be most unlikely without kitchen waste inclusion in kerbside. The 2008/09 ambition to make kerbside compulsory is premature without a bespoke kerbside scheme, including kitchen wastes, in operation.</p> <p>Although it is mentioned in the text, there is no indication of the interplay between this programme and other policy tools available. Before moving to compulsory recycling, LDC should move to alternate fortnightly collections. This should coincide with the introduction of kitchen wastes to kerbside. This is an operational [and political] pre-requisite to transfer the balance of system allocation to the premium recycling service, and away from 'residuals as normal'.</p> <p>The option of variable charging has been successful in Europe, and is being explored in Scotland. It is likely to become a permissive power to local authorities in England well within the timeframe of this strategy. It may be that this is a more persuasive tool for behavioural change than compulsion, certainly in the first instance.</p> <p>The 2.5 % gains attributed to compulsory recycling in Action Plan 4 are relatively low, and I cannot understand how these have been determined. This does not seem to correspond with observable impacts where this has been tried elsewhere, and I would need some evidence as to how it has been assessed in this case.</p>		<p>As stated above this will be reviewed over the next year.</p> <p>As above this will be reviewed with kitchen waste and cardboard.</p> <p>This will be reviewed when the legislation allows it.</p> <p>The levels have been deliberately conservative as it is anticipated that compulsory recycling will only be relevant to the 30% that do not currently participate. Of those a fraction will use bring sites, others may not be able to recycle and those that can but do not wish to are believed to be likely to be less effective than those that are happy to contribute to the cause of sustainable waste management.</p>
<p>Further Comments.</p> <p>There is a dearth of information on the financial parameters that the strategy must work to. This is important in setting the priorities for scheme expansion, as one would expect the cost benefit analysis to favour the choices which offer the greatest marginal</p>	<p>1</p>	<p>Information has been added. Financial information is also freely and publicly available through the reports to Cabinet and the Council's published accounts.</p>

<p>increment to be developed early, to minimise future capital expense, amortise any necessary expenditure as early as possible, and secure the maximum benefit to LDC from options chosen.</p>		
<p>The schematic does not indicate how LDC plan to deliver the higher 50% target that is council policy. This is not likely to present itself as a windfall, so the strategy should engage with ways of consolidating the gains to 2011 with full route map through to the policy goal.</p> <p>Reference to those waste collection authorities currently achieving high recycling figures, by a comparable route to that identified, would be useful as a template.</p>	1	<p>The Strategy is proposed until 2010 / 11. This takes the Council to a 40% rate as planned. After that there is potential to get to 50% by other methods which may or may not include e.g., kitchen waste. These options will be reviewed as stated above during the progress of this strategy to achieve 40% by the end of the term.</p>
<p>More street sweeping needed in Lewes town.</p>	1	<p>Operationally street sweepers have been asked to sweep (as opposed to litter-pick) from 2005. The Council has achieved the required Best Value Performance Indicator standards that the Government has set nationally. Work is ongoing to move resources into street sweeping over the next two years.</p>