

**Councillor Simon Letts**  
**LEADER OF THE COUNCIL**  
Southampton City Council  
Civic Centre  
Southampton  
SO14 7LY



Our ref: SL/Is  
Please ask for: Councillor Simon Letts

Date: 21 August 2017

[REDACTED]  
Environmental Quality  
Defra  
17 Smith Square  
London  
SW1P 3JR

Dear [REDACTED]

Further to the letter from Thérèse Coffey MP, the Minister responsible for waste and recycling, I am writing to provide you with the further information requested about how we intend to increase our recycling rate. Please note that 2016/17 data demonstrates a further increase in the city's recycling rate to nearly 30%.

**What's working well?** Do you have any positive experience it would be helpful to share?

- The council has changed its collection methods and from 5 June 2017, now collects general waste every two weeks. This change will require residents to recycle more which will increase the city's recycling rate to over 30% and also reduce the amount of waste generated.
- The council is a member of Project Integra, Hampshire's local authority waste partnership. Close working between Southampton and Hampshire's waste collection and disposal authorities has led to the development of a waste infrastructure, which has enabled excellent landfill diversion rates in England. In 2016-17, Southampton sent just 12% of domestic waste to landfill and 16% of municipal waste to landfill and is making a significant contribution to the UK meeting its targets for the diversion of Biodegradable Municipal Waste. 84% of waste is sent to recycling and energy recovery.
- By disposing of waste at an energy recovery facility, the council is helping to generate electricity for 52,000 homes.
- In the 2016 City Survey, 82% satisfaction level was achieved for bin collections which is matched by a survey completed by MORI in 2016, which showed an 80% satisfaction level, compared with a national satisfaction level of 77%.
- Material collected by street sweepers is also now being recycled and will be reflected in the 17/18 data.
- When considering the amount of total waste produced in Hampshire households, Southampton was in the top quartile for unitary authorities (ranked 23 out of 92).
- The service delivers an education programme with schools, and works with residents, community and resident groups to improve recycling. Targeted work is being undertaken.

**Are there particular reasons affecting waste and recycling locally to you?** And do you have views on how they could be addressed?

- Southampton is a diverse city, with areas of deprivation in parts of the city. It has two universities and a student population of over 40,000 who recycle differently in halls of residence, and often from where they have come from. There is also significant population

churn, a significant number of residents who do not have English as their first language, large numbers of Houses in Multiple Occupation and significant numbers of the population living in flats – all these factors impact on the recycling rate. Not having a common method of recycling across the country means transient and established communities can get confused about recycling.

- Whilst the service has produced simple pictorial information about recycling, there is a limited communications budget due to financial constraints facing the council.
- Authorities that do not charge for garden waste, will often have a higher recycling rate. Due to financial pressures the council needs to charge for garden waste collections, which also impacts on our recycling rate.
- What can be recycled is currently constrained by disposal infrastructure and any changes to this would require significant financial investment.

**Are there obstacles outside your authority's control that may affect your recycling rate?**

- The waste disposal authorities in Hampshire, including Southampton have a long term integrated waste disposal contract which currently handles the disposal of residual waste and the processing of collected recyclables. The contract length and cost of investment in infrastructure is such that it can be difficult to pursue some opportunities as markets and technologies change. However, the contract has been extended to 2030, which creates an opportunity to look again at the type and configuration of waste infrastructure that we have, with a view to both reducing costs and increasing recycling. Feasibility of this is dependent on costs and sustainable markets.
- The Energy Recovery Facilities produce a by-product known as Incinerator Bottom Ash (IBA). This material is recycled as a building aggregate and used in construction projects across Hampshire. Current recycling rate definitions do not allow us to include this material in measures of recycling rate, but if they did, this would add 10.42% to our recycling rate.
- Instability of the markets - this is always a concern for existing targeted materials but also a concern when considering large capital projects. For example, the inclusion of plastic pots, tubs and trays (PTT) in recycling. Despite the inclusion of PTT in WRAP's recent consistency framework, we are not clear that there are currently viable end markets for the bulk (c.75%) of this material.
- A significant proportion of Hampshire waste is packaging, much of which can be recycled. However much of it is material that cannot be recycled in an economical way – in particular, new types of hybrid materials (e.g. cat food pouches that are a mix of aluminium and plastic) that have no established route for recycling. Packaging trends can change quite quickly, which doesn't align with the time frames for developing or altering waste collection and disposal infrastructure.
- WRAP's recent annual report on waste facility gate fees showed another increase in gate fees at Anaerobic Digestion (AD) facilities. Hampshire's early adoption (in the 1990s) of a landfill diversion strategy has led to a cost-effective method of recovering value from residual waste, and the economics of food waste collection and disposal are not conducive to separating this out for separate processing.
- It is difficult and time consuming to use enforcement powers to enable residents to comply with requirements to recycle. Section 46(a) of the Environmental Protection Act, reduces the burden on the householder and increases the burden on the local authority at a time when staff numbers have been reduced. It is an onerous process which does not quickly address the issues that incorrect presentation produces.
- With cost pressures/budget constraints, this impacts on our ability to expand services.

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**Over the longer term, what are the biggest challenges and opportunities you see in driving recycling improvements locally?**

- The UK's devolved Governments, in particular Wales and Scotland, have provided councils with a clear and coherent strategy for future management of waste and resources and funding with which to deliver it. This has helped to develop relevant infrastructure and incentives for Councils to improve performance. England would benefit from a similar approach.
- Balancing the investment required in new services with the need to balance council budgets and maintain high quality local services to our residents.
- Further infrastructure development is needed – for example, the processing capacity for plastics is limited, and without a viable market this makes it difficult to justify collecting a wider range of materials. This situation would be helped by introducing drivers to incentivise producers to include recycled feedstock (secondary raw materials as opposed to virgin) in next generation products.
- Split responsibilities for waste management over two tiers of local government doesn't always allow for a full "Whole System Cost" approach.
- Ensuring residents take responsibility for their waste.

Kind regards

Councillor Simon Letts  
**Leader of the Council**