

Climate Action Lewisham (CAL) welcomes the Council's Draft Waste Management Strategy. We would support the implementation of the great majority of the ideas and proposals that it contains and we will work with councillors and officers to achieve them.

Our concerns, however, are that the Draft Strategy lacks the real ambition and bite necessary in the face of the Climate Emergency we all face.

We need a Strategy that is far bolder and far more rigorous in working through just exactly how key objectives will be achieved.

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1. Good moves

CAL wishes to highlight our particular support for:

- **The introduction of more community recycling skips** – see Priority 2 – Shaping service to follow the waste hierarchy p 12). These would need to be available to take the full range of recycling items that are not collected a curbside.

Almost half of Lewisham's residents do not own cars and currently find it almost impossible to access the Landmann Way facility, situated as it is at one edge of the borough with limited public transport links.

Community recycling skips located at key locations throughout the borough would mark a radical improvement in the recycling opportunities facilities available to the borough's residents.

We would, however, propose that the Council aim to make these localised facilities available on a permanent, rather than "rolling" basis, if at all possible. We are concerned that materials for recycling might start to be dumped at the skips' locations on the weeks when the recycling containers were not on site.

Supplementing the Landmann Way site with smaller community recycling facilities would also help combat the fly-tipping which is such a scourge. This reduction in visible fly tipping, via the provision of enhanced local recycling facilities could then feed back into increased support amongst the wider public for the provision of additional waste management measures.

Meanwhile, any consequent reduction in the resources used for issuing fly tipping penalty notices could be reallocated to the provision of better facilities for responsible waste disposal.

- **The implementation of communal underground systems** for waste collection on all new developments where the scale of such developments makes this feasible. (Priority 2 p.12) Envac, a Swedish company, has installed such a system at Barking Riverside in London (<https://www.letsrecycle.com/news/envac-goes-live-at-barking-riverside/>) We would wish to see such communal underground systems included in the new Local Plan currently in development and in associated design briefs.
- **"Phase out the use of single-use plastics** from within our own buildings and encourage business aligned to the Council to do likewise." (P.10)

This is a crucial first step to addressing throwaway culture and reducing waste levels. Single-use plastics should be phased out as quickly as possible and staff encouraged and supported to replicate these practices at home.

- **"Create project plans regarding potential repair and re-use.** The shops could be social enterprise organisations making use of existing networks of Repair Cafes, Refurbishment Hubs and Restart Projects"(p 10)."

Hubs both physical and digital are vital to nurturing re-use culture, creating opportunities for upskilling and building community wealth. There is a need to generally promote the sharing economy as part of these re-use hubs. Existing retail spaces or under-utilised council assets could be used. Hubs also create valuable opportunities for volunteering and for signposting to other council sites. Project plans in this area should be actioned as a priority and pilot activity started. This is something Climate Action Lewisham is particularly well-placed to promote and support with communication and social media power.

- "Using incentives such as a grant, contest or quality label, **encourage businesses and local industries** to sell and use reusable or recyclable products and packaging (e.g. cutlery, straws,

bags, glasses, bottles, cups, boxes).” (p17)

There are many current examples - from ReLondon here in London, to Cleveland, Ohio, USA - of innovative grant programmes aimed at businesses and community groups which promote and apply circular solutions and business models. The scoping, design and piloting of such grant programmes by the local authority here in Lewisham would open huge possibilities which could then be built on further. Again, Climate Action Lewisham would be keen to promote and support such initiatives.

- **“Explore how to expand the use of the Lewisham Local Card** to encourage residents and businesses to buy locally, reduce their need to travel and decrease the chance for local resources and products to be wasted.” (p. 22)

An expanded Lewisham Local Card could provide an effective infrastructure to support longstanding residents and support them in buying good local produce and services. Lewisham Local Card participants could constitute a good network upon which to test re-use and circular initiatives.

SELCHP: CAL notes, but does not formally support, the proposals for the SELCHP incinerator put forward in this Strategy. The Council is doubtless aware of the concerns of many residents about the role incinerators should play in waste management and about the threats posed to air quality. We would welcome the opportunity for ongoing dialogue with the local authority on this important issue.

2. Working with the community

The Draft Strategy frequently mentions encouraging and working alongside grass roots community groups to maximise waste reduction and together build a greener Lewisham:

“As underutilized spaces and graffiti can sometimes contribute to create an environment that encourages anti-social behaviour in the public space such as littering and fly-tipping; [the Council will] support the uses of the empty spaces for community gardens and artwork and develop art and gardening policies and activities to facilitate the improvement of the borough (Priority 1-Our Ideas at page 10, 4th bullet point).

This is an area where the public and many small and emerging community groups are eager to engage. Being fully embedded in the community, Climate Action Lewisham comes to hear of anecdotal examples which suggest that this policy would be welcomed:

- At one end of Ravensbourne Road, SE23, where it joins the A205 (Catford/Forest Hill), there is an area which has regularly attracted fly-tipping, to the intense annoyance of the Blythe Hill Action Group, the local residents' association. The Action Group has contacted the Council and suggested that one positive solution would be to utilise the land currently used for fly tipping to create a pocket park with trees and plants and utilising old railway sleepers, and has had a positive conversation with council officials.
- At the end of Silver Road, SE13, very near the railway line and the Ravensbourne River and quite close to central Lewisham, the residents despair of fly tipping and are keen to create a small pocket park of some sort to try and address the problem. They talk about it on their neighbourhood WhatsApp group but currently lack resources and are unsure about the permission needed to do this.

Community groups are also active in promoting a circular economy:

- The Library of Things is a very valuable community project which loans out to people, at minimum cost, a whole range of items so they do not have to buy such items, themselves, thus reducing consumption, space taken up in homes and excess waste. Currently, the closest Library of Things is in Crystal Palace. They would like to be able to expand into the centre of the borough but have not yet been able to find premises. Committed to a low carbon footprint, the Library of Things is understandably keen to ensure that their sites can be as local as possible, so that they can be accessed by people without any need to use a car.

Community groups will play a vital role in making a success of the Waste Management Strategy. We bring with us human resources, new ideas and enthusiasm, but community groups often need support, both financial and technical, and crucially, we can work with the people, but not with the bigger items such as premises, resources and political permission.

CAL would wish to see the Strategy set out in detail the support that the local authority intends to offer to local community groups to help achieve our shared goals.

3. Waste Management in Blocks of Flats

Blocks of flats pose many challenges for the implementation of any waste management policies that are aiming towards a circular economy. Recycling contamination is very high for several reasons.

CAL would wish the Lewisham Strategy to make full use of the toolkit created by Wrap and Resource London which seeks to establish a minimum standard for blocks of flats <https://relondon.gov.uk/wp-content/uploads/2021/02/Resource-London-Recycling-in-flats-toolkit-2020.pdf>

Milan provides a case study of the route one European city has taken - where 80% of residents live in multi unit dwellings, compared with 40% in Lewisham. The city authorities have implemented rules and regulations with proper enforcement to ensure the success of food waste separation.

“Rules and regulations set by the Municipality and a proper enforcement system, including inspections and fees for non-compliance are necessary for the good performance of the program” Cristina Fusco, responsible for Project and Planning Service at AMSA.

Milan aims to recycle 65% of municipal solid waste. Households and businesses may be issued a 50€ fine for non-conformity or if they present their bin at the wrong time. This is enforced by an ample team of agents who are tasked with inspecting the quality of the material in the bins prior to collection. About 50,000 fines are issued every year.

In the case of the 80% of Milan’s residents in flats, citizens share bins with their neighbours. If contamination is found in these shared bins then a fine is issued to the building and is payable to all residents, regardless of the perpetrator. This measure provides strong social pressure on residents to use the system correctly.

We appreciate that the powers and funding levels of local authorities vary widely from country to country, as do the cultures in which those authorities operate. But the example of Milan serves as an example of what another big city, with a far higher proportion of flat dwellers than Lewisham, can achieve.

4. Carrots and Sticks: the time to act is now

In the Forward to the Strategy, the Council’s Cabinet Member for Environment and Transport writes how the authority is “passionate about providing a cleaner, greener, environmentally sustainable borough”; later the document says that the Council wishes “to be ambitious, show leadership and innovate”.

Unfortunately, however, the Strategy, as currently drafted, appears to CAL to be far from the ambitious document it claims to be. More than two years after the public Declaration of a Climate Emergency it is disappointing to find that in proposing a new Waste Management Strategy the wording chosen to introduce new initiatives is repeatedly set out in terms of ‘to help to’, ‘explore how to’, ‘consider to use of’, ‘encourage’ and ‘to trial’. This kind of language does not inspire optimism when used in terms of a ten-year timeline. More concrete achievements should be described, with more authority and less caution. We risk losing valuable time in the global fight against unnecessary waste.

All of the initiatives outlined in the Strategy have been implemented in the UK or elsewhere and have already been seen to work.

We would, therefore, wish to see a Strategy which:

- clearly lays out the recognised good practice in each area; and then
- sets out a plan as to how Lewisham will achieve good practice in that particular area. Our submission has included a few of the many such examples which are available for Lewisham to learn from, adapting to local circumstances, of course, as necessary.

5. Data, Priorities, Costings and Targets

CAL would wish to see the Strategy founded upon a wider range of published data about the current waste management situation in the borough. We would also argue strongly that the Waste Management Strategy needs to have clearly articulated costings, priorities and targets.

Residents and local community groups are fully aware of the severe financial constraints facing Lewisham, in common with all other local authorities. A Strategy without clear costings attached may not, therefore, command the respect it deserves.

These aspects of the Strategy are too important to be left to any subsequent Implementation or Action Plan. Without details the Strategy risks becoming a wish list rather than the call to targeted action that is needed. We would like the Council to be clear about the limitations it faces, but *then* set out what it aims to achieve within the level of resources - capital, revenue and staffing - that it expects to be available to it in the years ahead: a clear focus on where precious resources can best be used to give quantified long-term results, a true cost benefit analysis. This is exactly where the local authority has a vital leading role to play on behalf of the community it serves.

Five Years rather than Ten

Ten years is a long period of reference for the Waste Management Strategy, when the world is changing so fast, in so many ways, and resources are so uncertain. We believe that the proposed Strategy, with costings, targets and priorities, will work better over five years rather than ten. Five years is the timeframe the Council has chosen for its forthcoming Strategy on Air Quality and we believe that it would be wise to follow that example for Waste Management, too.

Targets

Currently, the Strategy cites few, if any, targets, other than those posed externally by the GLA. Without clear targets, however, there can be no clear monitoring, nor assessment of achievements and it will be much harder to make whatever adjustments to the Strategy that may be required.

Without targets residents and council taxpayers lose a crucial means by which they can hold their local authority to account.

6. More details please

In the following section we highlight particular areas where we believe more detail would enrich the final version of the Strategy.

Rationale and data: the Draft Strategy presents high-level data graphs, but does not share any waste composition data to justify the rationale behind the Strategy. We cannot, therefore, feel assured that Lewisham will be able to move from 20% recycling to 50% in less than 5 years.

There is no detail of waste composition analysis to be able to establish, as a baseline, the relative roles played by food, construction materials, plastics, etc., in the overall total volume of waste that the Council has to manage. It is unclear how the Council will be able to prioritise which segments and

material flows without such data. Likewise, the Strategy pledges to target current waste hotspots, but it does not give details of where those are currently situated.

Priorities, objectives and ideas: CAL would appreciate greater clarity on which ideas relate to which objectives. The level of ambition for Priorities 3 and 4, “Working together...” and Using Waste as a Resource...” seems very limited. The Strategy would benefit from greater concrete detail in how the Council might work with businesses and successfully engage with “hard to reach” residents.

We would suggest the Council gives plans to work with free community newspapers, such the Lewisham Ledger, and with neighbourhood level social media to maximise awareness of the Waste Strategy’s imperatives. In addition, we would like to suggest that the Council plans to to engage with residents at key junctures where lifestyle changes are often made, such as engaging with new mothers, parents of nursery starters or with new residents, whether tenants or homeowners.

The Cleaner Lewisham App is a positive development. However, we would like to know how many residents are utilising it and what plans are there to increase uptake if needed. Climate Action Lewisham engages fully with local social media and the level of general ignorance about how waste disposal works, how street cleansing works and what the council can and cannot do is very high indeed. CAL runs regular litter picks with community groups and talks to participants, who have all come on a litter pick because of a personal desire to clean up the local area, about how to flag litter problems and what happens to hard-to-dispose-of waste, and it is usually very well received by residents: all information they didn’t previously know. The council’s waste team are very helpful in supporting CAL to run these litter picks.

Circular Economy and the Local Plan: CAL recognises this is a potentially high impact initiative. However, there are currently no ideas or actions associated with following this up. The Draft Local Plan requires developers to prepare statements setting out how they will avoid landfill and re-use as much material as possible. We would like to know how the Council will collate, disseminate and learn from the large amount of new information that this new requirement will generate over time. We are also interested to know whether the Council will consider making this requirement apply to all developments, rather than only the very largest, as appears to be the case at the moment. Also, we want to know how the Council plans to support individual households who wish to move towards a circular economy with any improvements which they make to their own homes?

7. Working with others to influence Central Government

The Council has an important role to play in working with public bodies and other authorities to support central government initiatives aimed at promoting the better management of waste.

In particular, we would wish Lewisham Council to join with others to lobby the Government to introduce as swiftly as possible the requirements of the Extended Producers’ Responsibility (EPR). The EPR will set new standards for the recyclability of manufactured products and impose a levy or tax paid on companies which fail to meet those requirements. Local authorities will, it is hoped, have access to

the funds accumulated by the EPR which could thus form an important income stream in the future for the investment in and enforcement of waste management policies.

8. Leadership

The waste crisis deepens and Lewisham is drowning in waste. The public is disgusted by fly tipping, horrified by litter and dangerous waste and many of us are only too aware that the products we buy are over-packaged. Now is the time for the Council to show true leadership. Climate Action Lewisham will support a Council that is bold, takes a long-term view and stands firm when necessary to achieve progress in waste management for a sustainable future.

Climate Action Lewisham, October 2021

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