

Environment and Sustainability Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date:

Wednesday, 25 June 2014

Meeting time:

09.20

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



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Agenda

Informal Pre meeting (09:20 – 09:30)

1 Introductions, apologies and substitutions

2 Inquiry into recycling in Wales: Evidence from Wales Audit Office

(09:30 – 10:15) (Pages 1 – 33)

E&S(4)-16-14 paper 1 : Wales Audit Office

Jane Holownia, Director, Performance Audit

Andy Phillips, Performance Audit Manager

Break (10:15 – 10:25)

3 Inquiry into recycling in Wales: Evidence from Local Authorities (10:25

– 11:40) (Pages 34 – 92)

E&S(4)-16-14 paper 2 : Caerphilly County Borough Council

E&S(4)-16-14 paper 3 : Denbighshire County Council

Mark S. Williams, Head of Community and Leisure Services, Caerphilly County Borough Council

Andrew Wilkinson, Head of Neighbourhood Services, Conwy County Borough Council

Alan L. Roberts, Senior Waste Officer, Denbighshire County Council

Stephen Thomas, Senior Waste Strategy Officer, Merthyr Tydfil County Borough Council

Richard Brown, Head of Environment and Civil Contingencies, Pembrokeshire County Council

4 Inquiry into recycling in Wales: Evidence from Natural Resources

Wales (11:40 – 12:20) (Pages 93 – 99)

E&S(4)-16-14 paper 4 : Natural Resources Wales

Isobel Moore, Head of Business, Regulation and Economics

Nadia De Longhi, Strategy Manager – Waste

5 Papers to note (Pages 100 – 101)

Minutes of the meeting held on 11 June 2014

Biodiversity – Further information from Natural Resources Wales following 21 May meeting (Pages 102 – 106)

E&S(4)-16-14 paper 5

Correspondence between the Chair and Natural Resources Wales following 7 May meeting (Pages 107 – 136)

E&S(4)-16-14 paper 6

Inquiry into the Welsh Government's proposals for the M4 around Newport : Response from the Minister for Economy, Science and Transport to the letter from the Chair on 5 June

E&S(4)-16-14 paper 7

6 Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for item 7

Private Session

7 Forward Work Programme – Update (12:20 – 12:30)

Agenda Item 2

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Mr Alun Ffred Jones AM
Chair of the Environment and Sustainability Committee
National Assembly for Wales
Cardiff Bay
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Date: 10 June 2014
Our ref: HVT/2163/mjb
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Dear Chair

INQUIRY INTO RECYCLING IN WALES

Thank you for the opportunity to respond with my comments on waste recycling in Wales, and for inviting us to give evidence to the Committee on 25 June 2014.

I am pleased to accept the Committee's invitation and I will be represented at that meeting by Jane Holownia and Andy Phillips. I am aware that Andy has already had some contact with the Committee's clerking team as the Committee has determined the terms of reference for its inquiry. Andy was the project manager for my February 2012 value for money study report on *Public Participation in Waste Recycling*. Andy also manages work on benchmarking of councils' waste recycling services and waste management services more generally.

I have annexed to this letter an initial response to the Committee's consultation, which, no doubt, can be expanded upon as part of the planned evidence session.

Yours sincerely,



HUW VAUGHAN THOMAS
AUDITOR GENERAL FOR WALES

Encl: Annex: Auditor General for Wales response to the Environment and Sustainability Committee Inquiry into Recycling in Wales

ANNEX: AUDITOR GENERAL FOR WALES RESPONSE TO THE ENVIRONMENT AND SUSTAINABILITY COMMITTEE INQUIRY INTO RECYCLING IN WALES

1. As Auditor General, I am independent of the National Assembly and government. I examine and certify the accounts of the Welsh Government and its sponsored and related public bodies, including NHS bodies. I also have the power to report to the National Assembly on the economy, efficiency and effectiveness with which those organisations have used, and may improve the use of, their resources in discharging their functions. Together with appointed auditors, I also audit local government bodies in Wales, conduct local government value for money studies, and inspect for compliance with the requirements of the Local Government (Wales) Measure 2009.
2. I am required by legislation¹ to comment on councils' improvement objectives and their arrangements to agree and achieve them, and on the quality of their self-evaluation and how they communicate this evaluation to local people. Usually, my commentary on recycling is restricted to tracking progress against key performance indicators but, on occasion; more in-depth audit work is undertaken.
3. In September 2013, I published my review of *Local Improvement Planning and Reporting in Wales*². Recycling featured in this report as an example where performance comparisons did not clearly help councillors and local people understand the performance of their council. Particularly, my review of one council's performance report found that a lack of balance and appropriate comparison seriously weakened the accuracy of reporting to the public. The council's report did not identify that it was unlikely to meet the Welsh Government's recycling target and had failed to underline the potential significant financial implications of not doing so. My report also noted that there have been occasions when the audit opinion in respect of the National Strategic Indicator for the percentage of municipal waste collected which is prepared for reuse and/or recycled has had to be qualified. Most coastal councils have been unable to separate out beach cleansing waste from the total as required by the Welsh Government's definition of that indicator. However, my report also highlighted that Gwynedd Council had made good use of monitoring data to focus improvements on areas across the county where recycling and composting levels were low, and that this was a good example of a council making use of performance information to evaluate, inform, and drive improvement.
4. My review of councils' improvement objectives for 2013-14 indicates that several councils (including Newport, Pembrokeshire, Powys, Swansea, and the Vale of Glamorgan) have specific objectives that mention recycling. Many other councils have more general improvement objectives for the environment, sustainability, carbon management and climate change. I would expect recycling to feature as part of councils' wider improvement plans in those respects.

¹ The Local Government (Wales) Measure 2009 requires the Auditor General to undertake an annual improvement assessment, and to publish an annual improvement report for each council in Wales stating whether he believes that they have discharged the general duty to 'make arrangements to secure continuous improvement in the exercise of [their] functions'.

² <http://www.wao.gov.uk/publication/local-improvement-planning-and-reporting-wales>

5. Noting the terms of reference for the inquiry, I can advise the committee that I addressed many of these issues in my February 2012 value for money study report on *Public Participation in Waste Recycling*³. The report gives an account of the Welsh Government's collaboration with councils at that time to increase recycling rates. I am pleased that the Environment and Sustainability Committee is now to hold an inquiry, as many of the issues raised in my report seem to persist, although Wales Audit Office staff have not undertaken any detailed follow-up audit work since my report. In particular, the report provides useful commentary for the inquiry on the reasons why such a wide variation in recycling practice has evolved. The report also comments on the alignment of recycling practice with the Welsh Government's preferred methods, a debate that I am aware continues today even after some further clarification of the requirements of EU and domestic legislation. Jane Holownia and Andy Phillips would be happy to expand further on the findings set out in my 2012 report in their oral evidence. The Public Accounts Committee did not undertake its own inquiry in response to my report, although it did seek responses from the Welsh Government to some of the issues it raised which are part of the public record.
6. Other recent activity by Wales Audit Office staff in this area relates to waste benchmarking work undertaken in collaboration with the Welsh Local Government Association. Each year Wales Audit Office staff report the main findings and conclusions of benchmarking of councils' waste recycling services, and waste management services more generally, to the Ministerial Waste Programme Board.
7. Since about 2000-01, Wales Audit Office staff, and the staff of the former Audit Commission in Wales, have facilitated and supported benchmarking of councils' waste recycling services, and waste management services more generally. Over that time, this work has involved the production of annual reports and tools to facilitate the sharing of good practice and to enable councils' waste management teams to analyse and improve recycling and other waste services.
8. Benchmarking looks back at data and draws conclusions that can help services make decisions that are more informed about performance, efficiency, and costs. To do this, data on costs must be reliable, and this means waiting for some months after accounts close for subsequent audit verification. Fully verified cost information is unlikely to be available from councils before October, sometimes several months later, with analysis and reporting in spring of the following year. It is a frequent criticism of benchmarking that the process is always so out of step with the current position. However, reliable data must be the bedrock of this process and our experience is that with less reliable sources of data, waste benchmarking results are either discredited or falsely claimed as a success. This leads to scepticism, which undermines the usefulness of the benchmarking process and outcomes that are an unreliable source of good practice to follow, potentially swaying decisions about the use of funds away from methods that offer value for money.
9. Our experience is that although the overall recycling rate for Wales continues to improve, this hides a different improvement pathway for each council, as they introduce and optimise

³ <http://www.wao.gov.uk/publication/public-participation-waste-recycling>

the performance of new systems. Contracts with the private or third sector for the treatment of recyclables, sometimes also their collection, are a necessary part of operating council recycling services, but long and inflexible contracts can tie councils and limit change. These contracts can be particularly restrictive because local and global markets for recyclable resources still fluctuate widely and long and inflexible contracts can hinder the collaborative approaches that can help to overcome geographic and demographic barriers. The route to improved recycling services and better efficiency is not steady, but more likely to be a series of step-changes with the introduction of new initiatives. As these steps are likely to happen at different times and at different rates depending upon local circumstances, comparing performance is difficult. However, this effect may now be reducing as councils offer kerbside dry and food waste recycling to almost all households and several years of experience has sharpened operational delivery. This means that the benchmarking analysis may be more reliable now than a few years ago, so strengthening performance comparisons.

10. Auditing verifies the data for the national performance indicator on the annual rate of recycling for each council, but this necessary process delays publication until about November. Rolling 12-month averages and quarterly reports of council recycling rates are a useful indication of progress, but there is considerable seasonal variation, perhaps around four percentage points, particularly a regular peak in the recycling rate due to green waste growing season.
11. Faced with so many variables, councils can underplay the important role of the citizen in voluntarily participating in recycling. Even with the best possible provision of recycling facilities and services, success still relies on participation, and in changing the behaviour of citizens towards recycling. With reducing resources and in particular capital funding, few councils can easily change the recycling systems that they have put in place over the past few years. In the recent financial climate, improving performance and reducing unit costs has centred on optimising the use of existing facilities and services. The Welsh Government's desire to see councils turn to their 'Collections Blueprint' model for waste services is therefore a considerable financial, logistic, and public engagement challenge.
12. Over the past eight or so years, all Welsh councils have introduced the kerbside collection of dry recyclable household waste from residents. Dry recyclables exclude the food and garden wastes now also separately collected and recycled. Removing food waste from other waste destined for recycling is important because by avoiding unnecessary contamination, and a higher price is possible for clean recyclable materials. In addition, removing and separately treating food wastes in an appropriate manner has a significant impact on reducing the ecological footprint of municipal waste and it helps to unlock the potential for 'closed loop'⁴ recycling of other materials. Kerbside recycling has helped to raise the recycling rate for Wales from about 20 per cent in 2004-05 to the current rate of about 52 per cent. Councils also continue to provide other means of recycling, such as household waste recycling centres and recycling 'bring' banks, giving citizens a range of opportunities to participate in recycling.

⁴ Closed loop recycling is recycling where materials are used continually for the same or a similar purpose rather than downgraded.

13. Councils employ a variety of methods for the kerbside collection and treatment of dry recyclables⁵ and they each believe that the method of presenting, collecting, and treating offers the best blend of convenience and good value for their residents. Since 2001, the Welsh Government has supported councils with specific waste grants and Revenue Support Grant⁶, allowing councils to choose freely the method of collecting and processing recyclable resources that they consider best serves their local needs. During this time, the Welsh Government has measured council recycling performance through the recycling rate, broadly allowing and supporting all methods of recycling.
14. The Welsh Government has chosen⁷ the ecological footprint as the measure of progress for sustainable municipal waste management, but did not provide councils with a way of calculating their impact nor collected and compared this information. All that councils had to judge their performance was the recycling rate, and in the absence of qualitative measures, a higher recycling rate meant better performance. At the time of my value for money study, I was concerned at the lack of progress of waste prevention in Wales although I note, but have not reviewed, some more recent activity in this area. However, successful waste prevention initiatives could reduce the ecological footprint by far more than the most effective recycling methods and are where the most significant performance gains are to be made.
15. Benchmarking results over the past three years suggest that no one method of collecting recyclable resources from householders offers a clear lead in performance, cost, or efficiency. However, there is considerable and largely unexplained variation in performance, cost, or efficiency within each of the three main methods of collection: comingling, multi-stream collections, and kerbside sorted collections. In addition, no single method stands out as 'the best' as each method can be well run and with high performance, or poorly run and poor performing.
16. The Welsh Government is keen to promote kerbside sorting, through their Collections Blueprint published in March 2011 and Municipal Sector Plan (Part 1), but waste benchmarking has yet to substantiate this preference. It is possible that as more councils introduce a Blueprint-style of collection system, perhaps as a part of more substantive service changes introduced through the Welsh Government promoted Collaborative Change Programme, the benefits will emerge.

ENDS

⁵ The three main methods of collecting kerbside recyclables are as co-mingled, twin-stream or kerbside sorted wastes.

⁶ In the WAO study, Public Participation in Waste Recycling (published February 2012), we indicated that this investment totalled £360.3 million since 2000-01.

⁷ The ecological footprint measures the land area required for food, resources, for energy and for wastes, and is the measure of sustainability use in One Wales: One Planet, the Sustainable Development Scheme of the Welsh Assembly Government (2009), and Towards Zero Waste, national waste strategy (2010).

Agenda Item 3

Caerphilly County Borough Council for Wales

Environment and Sustainability Committee

RW 33

Inquiry into recycling in Wales

Response from: Caerphilly County Borough Council

RECYCLING IN WALES/RECYCLING IN CAERPHILLY

Explore Reasons for and Impacts of Variations in Local Authority Household Waste Recycling Practice in Wales

Wales has a diverse mix of Local Authorities in terms of their population, socio-economic conditions and land status. Caerphilly County Borough is a "Valleys" Authority characterised by densely populated settlements interspersed with large areas of countryside. The Authority has developed a service that meets the needs of all stakeholders and is crucially achieving the key objective of continuous increases in the amount of materials diverted from landfill.

To what Extent Local Authorities' Recycling Practice Aligns with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint, and to Explore Barriers and Enablers to Adherence

CCBC has tried a range of systems from source segregation through to the various comingled options. CCBC is now at the stage where it operates a system that suits the needs of its locality. The present service enables the Authority to meet the statutory recycling targets and at the same time satisfies the majority of residents and other stakeholders.

Assess the Availability of Information and Guidance to Householders about why and how they should be Recycling, and to Explore Potential Barriers and Enablers to Improving Recycling Rates

Caerphilly has developed a robust and comprehensive communications campaign to ensure that all residents are provided with the information and guidance they need to participate in the range of collection services.

Explore Local Authority Reactions to the Recently Published Waste Regulations Route Map and the Potential Impacts and Implications of this on Recycling Practice Across Wales

Caerphilly has always configured its frontline collection services to tie in with the requirements of its end markets. Caerphilly continues to be alert to the dynamics of the waste industry and will endeavour to comply with the ever more stringent requirements where practical.

Gain Greater Understanding of the Relationship Between Recycling Collection Practice and Recycling Rates

CCBC acknowledges that each Welsh Local Authority has different operating conditions to suit their local demography and their proximity to local disposal routes – there is no ‘one size fits all.’ People of Caerphilly can recycle wherever they work, rest and play and the Authority has proved that its current collection methods are the most suitable for its stakeholders as evidenced by continuous increases in recycling, exceeding Welsh Government recycling targets, and continuous improvement in customer satisfaction and participation rates.

1.) Setting the Scene

In 1998 Caerphilly County Borough Council introduced recycling collection services for the public. This regime was implemented in selected pilot areas across the County Borough initially delivering to 14,000 properties. The system consisted of the use of green 55 litre boxes for the placement of separated household materials.

2.) Developing a recycling service

The collection vehicles used were compartmentalised allowing an army of operatives to separate out the range of household recyclables. This collection system operated on a fortnightly basis. This was a revolutionary new service and like many other Local Authorities Caerphilly experienced many challenges.

This new collection system proved to be very labour intensive, time consuming, compounded by safety and capacity issues and generally proved to be quite an inefficient collection system compared to established services like refuse collection. In addition, the service suffered from low levels of public participation, limited coverage across the County Borough and inadequate collection frequencies.

Due to all these problems the Authority received a constant stream of complaints regarding:

- The frequency of collections (fortnightly was not sufficient)
- Insufficient storage (the boxes were too small)
- Capacity issues
- Materials being contaminated

- Containment issues (recyclables were subject to the vagaries of the weather, scavenging animals and littering)
- Burden on the public to separate at source
- Traffic congestion as a result of longer loading times on the highway

At the same time the Authority introduced a garden waste collection service on a fortnightly basis. This proved a very popular addition to the suite of frontline public services. However, this was only a seasonal service (operating between April and September) and there was a clamour from residents to increase the frequency of collections.

3.) Listening to local voices and meeting the needs and aspirations of its customers

As part of the Authority's continuous improvement process, Caerphilly has listened to the views and concerns of residents, elected members and partners and to this end trialled new ways of working that have been fine-tuned and currently operate today. These include:

- Weekly dry recycling (comingled)
- Weekly Food and Garden collection all year round
- Household Waste Recycling Centres (open all year round including weekends)
- Recycling on The Go! (24-hour facilities in a range of public places).

In 2007 the Authority trialled a weekly kerbside collection with wheeled bins. This pilot resulted in an immediate and dramatic increase in the public participation rate

and the tonnage of recyclable materials collected. Significantly, the council also received a stream of positive feedback from residents participating in the new scheme/trial and there followed many requests for this system to be rolled out across the County Borough. This happened in 2009.

4.) Continuous improvement

Public Participation

Following the major change to the collection regime the recycling performance has continuously improved with more people being encouraged to do their bit. For example, participation rates have increased significantly and have continued to improve (see table below).

Year	Participation Rate
2007/08	49%
2008/09	57%
2009/10	66%
2010/11	70%
2011/12	75%
2012/13	78%

Recycling Tonnage

In line with the increase in public participation, the amount of recyclable material diverted from landfill has also increased proportionally.

Year	Tonnage (kerbside dry recycling)
2005/06	4,768
2006/07	6,236
2007/08	8,229
2008/09	9,621
2009/10 (weekly co-mingled wheel bin service introduced)	16,286
2010/11	17,635
2011/12	20,106
2012/13	22,283

Recycling Percentages

The percentage of waste recycled has also increased year on year. In 2012/13 the Authority was just 1% shy of achieving the Welsh Government's 2015/16 statutory recycling target of 58% by i.e. achievement some 3 years early.

Year	Recycling Percentage (%)	Welsh Government Target
2007/08	32%	25%
2008/09	32%	
2009/10	44%	40%
2010/11	51%	

2011/12	55%	
2012/13	57%	52%

Satisfaction Rates

The recycling collection systems are geared towards busy, modern-day lifestyles and this is reinforced by public satisfaction levels which increased following the service change and remain constantly high and increasing. Since 2007 public satisfaction with recycling services has increased progressively. This is evidenced by the feedback received from biennial public satisfaction surveys (see table below).

Year	Public Satisfaction
2007	84%
2009	88%
2011	94%
2013	95%

In addition, the feedback from the public during door knocking sessions and road show events is generally very positive and constructive reinforcing the above satisfaction data.

5.) Rewarding Professionalism & Excellence

The Waste Management team at Caerphilly are enthusiastic, citizen focussed professionals experienced in all aspects of the sector. These attributes have helped

them develop an exemplar service that stands up to scrutiny and compares favourably to any other local authorities across the Country. This is a bold statement but is evidenced by the recognition they have received recently from a number of respected organisations that have bestowed a number of awards upon the Authority for their high performance levels, communication work and innovative developments in resource efficiency and frontline public recycling.

Caerphilly CBC has attained the following awards:

- Apse Service Awards – Waste Management and Recycling Service Team of the Year 2012 & 2013
- Larac Awards – Best Improved Recycling Rates (Target Success) 2012
- Chartered Institution of Waste Management – Local Authority Waste Hierarchy champions 2013
- Plant and Waste Recycling Show (PAWRS) – Food Waste Award 2012 and Local Authority of the Year 2013
- Zero Waste Awards – Waste hierarchy and minimisation campaigns 2012, 2013 and 2014
- CA Site of the Year Award 2012 (Lets Recycle.com)

6.) Sharing with Others

Whilst awards are important particularly the feel good factor they can generate to residents and staff alike, it is worth noting that our peers including neighbouring Authorities and third sector bodies communicate with staff regularly to see how Caerphilly functions and the waste team are always willing to share

experiences and practices to help create a better environment for us all. This is reinforced by a number of events that have been arranged to promote good practice, for example bodies including WRAP, CIWM, WLGA and LARAC have hosted seminars here.

7.) Closing the Loop

In line with Welsh Government's ambitions Caerphilly CBC has sustainable development as a guiding principle to all that it does. To this end, its procurement process and general day-to-day working systems do as much as practicable to ensure that the Authority avoids waste and reuses materials etc as per the waste hierarchy as well as buying products with a high recycled content. For example, the Highways department use kerbs made of recycled plastic and have used recycled glass in a number of construction schemes. In addition, the Parks department use compost created from our own organic waste in their parks and open spaces.

8.) Constant changes of waste composition

The packaging industry is constantly looking at ways of refining the composition and structure of containers for environmental and financial gain. It is interesting to note that over the last 15 years container packaging has evolved considerably and there is now a propensity of plastic containers in place of glass bottles and jars in the waste composition. Plastic containers are likely to continue to be more popular with retailers and freight companies and with this in mind, it seems likely that the proportion of the heavier packaging materials (such as glass and

metal) in the waste stream will continue to diminish. Therefore, Caerphilly recognises that it needs to continue to monitor its waste/recycling stream to ensure that appropriate reprocessing points remain available.

9.) Communications

Integral to the operational elements of the service is the communication of user information and awareness messages. The Authority has relentlessly shaped and fined-tuned the information to customers to ensure that everyone is singing from the same song sheet and not compromising the progress achieved to date (see attached Appendix 4 and 5 public information leaflets). The Authority realises the importance of continuing to engage and retain the support and commitment of its service users.

To this end the communications team regularly issue bulletins in the local press, update the corporate website and social media, report on performance and topical issues affecting waste and resource management. Complimenting this media work, the Waste team run a regular programme of road show events and door knocking exercises to reinforce the cleaner greener corporate and national campaign messages.

10.) Financial Implications

Caerphilly has worked towards a kerbside recycling regime that is proven, robust, safe and efficient. This has involved major investment in vehicles, communication and training. The positive outcome of this is that Caerphilly is ranked as the 9th

lowest cost Authority in the country. More importantly, Caerphilly has been ranked 1st in Wales for the capture rates per household for kerbside recycling (WLGA Waste Finance Report 2012-2013).

Therefore, any future changes to recycling schemes will impact significantly on the Authority's precious finances at a time when budgets are extremely limited. New systems will require major investment in new vehicle and reprocessing technologies. This will be difficult and indeed could be impractical to implement.

It is acknowledged that the end points for recycle are subject to change and the market price for materials is constantly fluctuating. Moreover we are under no illusion that the waste sector is continuing to research, invest, develop and refine technologies to mechanically separate materials and make system improvements that will inevitably make the industry more sustainable and economically practical and make the sorting process less onerous and less complex for all.

11.) Conclusion

Caerphilly Council is an area in the heart of Industrial South Wales. It is heavily urbanised and has a significant amount of deprivation in its communities. The introduction of recycling was challenging, but gradually the Authority has developed its service and configured it to meet the needs of its residents, workforce and end market users.

This was no mean feat and allowed the Authority to reap the rewards of public engagement in recycling. Presently, the service is user friendly and delivers to all its residents in rural and urban areas and now lends itself to being sustainable in terms of finance and frontline operations. This comprehensive suite of services is more popular than ever before and crucially it is sustainable in terms of finance and frontline delivery. In short, the people of Caerphilly “can recycle wherever they work, rest and play,” as set out in the ‘Towards Zero Waste’ mission.

The national table below clearly demonstrates the progress made in public recycling services at Caerphilly. Indeed it is significant to note that Caerphilly continues to be the top performing Authority in the “Valleys” region and moreover compares very well to other Welsh local authorities. Caerphilly has continued to achieve the progressive Welsh Government statutory targets whilst maintaining compliance with relevant environmental and health and safety

legislation.

Municipal waste reuse/recycling/composting rates by local authority (a)

	2008-09	2009-10	2010-11	2011-12	2012-13	
					Old definition (b)	New definition (c)
Isle of Anglesey	45.9	51.2	55.8	57.1	55.2	55.2
Gwynedd	36.7	43.0	45.9	48.1	51.2	51.2
Conwy	38.7	37.3	40.2	48.1	56.5	56.4
Denbighshire	33.7	52.5	56.8	55.7	57.4	58.0
Flintshire	42.4	43.2	47.1	48.3	50.6	54.9
Wrexham	37.4	41.0	48.8	53.3	53.0	52.8
Powys	41.3	39.7	37.7	42.6	51.2	50.9
Ceredigion	48.7	48.5	51.4	58.4	56.0	53.6
Pembrokeshire	38.9	44.3	48.9	50.0	52.9	53.1
Cardiff	33.8	40.1	43.4	49.3	54.3	53.8
Swansea	32.1	34.9	40.5	45.2	48.4	47.9
Neath Port Talbot	34.9	37.1	44.0	43.9	48.3	48.3
Bridgend	38.4	33.5	48.0	56.3	57.1	57.1
Vale of Glamorgan	40.4	41.2	43.8	52.4	54.5	54.5
Cardiff	34.5	38.3	41.6	51.2	49.1	52.2
Rhondda Cynon Taf	37.2	36.9	44.7	47.3	45.7	46.2
Merthyr Tydfil	31.6	35.7	36.4	43.2	49.2	49.1
Caerphilly	36.5	47.3	53.7	59.1	56.2	57.1
Blaenau Gwent	25.0	29.2	35.5	42.3	53.0	51.2
Torfaen	49.0	47.5	46.7	47.5	47.1	47.1
Monmouthshire	38.5	40.9	48.6	55.3	55.7	55.5
Newport	38.2	40.7	45.7	48.2	49.2	49.2
Wales	37.5	40.5	45.3	50.0	51.7	52.3

Source: WasteDataFlow

The Council has worked tirelessly to establish a sustainable and practical solution to the waste mountain. Reconfiguring services at this juncture is likely to be a retrograde step and there is major concern amongst officers and elected representatives that introducing a new regime will do irreparable damage to the recycling cause in terms of performance against targets. Moreover, it would be perceived by many in the borough as a blatant waste of money and resources to change a service that is operating extremely well and proving popular with all stakeholders. There is also significant concern among the controlling Labour administration that forced service changes against the wishes of citizens may have political implications with citizen views which will be expressed via the ballot box in the forthcoming elections.

The council acknowledge that there is room for improvement (particularly concentrating on targeting the minority of persistent non participants). However the Authority is concerned, particularly given the genuine positive feedback from residents that any change in dynamics will have a detrimental effect on the service and in turn the reputation of the Local Authority and Welsh Government as resource focussed and efficient organisations. Where central prescription prevails then the Welsh Government should provide assurance to Local Authorities that if their recycling performance reduces and they fail to achieve the statutory targets then there will be no fines levied.

In particular, central prescription over collection methods, disregards the wider duties set out in regulation 2 of the Local Government (Wales) Measure 2009 which include: strategic effectiveness; service quality; service availability;

fairness; efficiency; and innovation; whilst focusing on sustainability alone. Furthermore, it ought not to be automatically assumed that the separate collection of waste promotes or improves the environmental well-being of Wales (section 60 of the Government of Wales Act 2006). On the contrary, the restrictive and prescriptive enforcement of separate collection by Welsh Government may be acting contrary to this power and/or the intentions of section 60.

It is Caerphilly's understanding that for the purposes of deciding how to: fulfil their duties as an improvement authority; when making arrangements to secure continuous improvement in the exercise of its functions (section 2(1)); and, when setting its improvement objectives (section 3(1)), they must consult representatives who live, pay rates, use or are likely to use services and have an interest in the Authority's area. The local agenda and social impact consideration should not be overridden by sustainability considerations. It is therefore crucial that the views of the residents of the county borough on service delivery are taken into account and that central prescription must never take priority over the ability to make local service choices.

It is also worth noting that Caerphilly has recently come out top of the Welsh Government's *National Survey of Wales* which further demonstrates the satisfaction with the citizen focussed services delivered by the Authority. Consequently, given all of the issues outlined above, the Authority is firmly of the opinion that Local Service choice (as long as it achieves agreed outcomes) should

be allowed to prevail and that Local Authorities should not be constrained by Central Prescription over service delivery.

12.) Things to be Proud of

- National Awards
- Amount of Recycling material diverted from landfill
- Participation levels
- Increasing public satisfaction levels
- Recognition in the 2014 WG "National Survey of Wales"
- Household Waste Recycling Centres
- Recycling on the Go! Facilities
- Campaign work on public recycling, waste minimisation and resource efficiency
- Over 10, 000 bags for life issued (and pledges signed)
- 12,000 composter bins issued to residents
- Professional team/workforce



WLGA Waste Finance Project 2012-13 Local Authority Bulletin – Caerphilly County Borough Council

OVERVIEW

- Caerphilly's overall net expenditure on household waste services (Residual, Dry recycling, Organic, CA and Bring sites) for 2012/13 was **£12,214,179**.
- This represents an expenditure of **£158 per** household per annum (£3.04 per household per week).
- When compared with the other local authorities in Wales on a per household basis, Caerphilly are ranked as **9th** lowest cost authority (median expenditure per household is £181, lowest expenditure £120)
- Overall expenditure on household waste services has **risen by 7.8%** when compared to 2011/12.

INDIVIDUAL SERVICES

Dry Recycling

- Total Net service cost - £43.13 per household.
Ranked 14th lowest of 22, median cost £35.63, Lowest cost £9.29
- Collection cost - £25.10 per household.
Ranked 9th of 22, median cost £26.59, Lowest cost £9.29
- Post collection costs (Transfer, Treatment & Disposal) £18.03 per household.
Ranked 20th of 22, median cost £4.67, lowest cost -£6.18. (£6.18 income per household).
- Service collected a total of 22,460 tonnes, which equates to 291 kg per household. Ranked 1st of 22 authorities. Median mass per household 190 kg, highest mass 291 kg.

Organic Wastes

Caerphilly were one of 7 authorities which offered a commingled food and green waste collection service.

Commingled Food & Green Waste

- Total net service cost - £26.07 per household served.
Ranked 3rd of 7, median cost £31.88, lowest cost £23.69.
- Collection Cost – £16.20 per household served,

Ranked 2nd of 7, median cost £18.97, lowest cost £16.04.

- Post collection costs - £9.87 per household.
Ranked 3rd of 7, median cost £10.51, lowest cost £6.18.
- Service collected a total of 11,145 tonnes during 2012/13, which equates to 144 kg per household. Ranked 4th of 7 authorities. Median mass per household 144 kg.

N.B. Merthyr Tydfil CBC collect food and green wastes separately, but do so using the same vehicles & crew and are unable to disaggregate costs, so their data is listed under combined collections.

CA Sites

- Total net service cost - £39.65 per household.
- Ranked 17th from 22, median cost £29.96, lowest cost £12.73.
- CA sites handled 27,387 tonnes of waste at an average of 354 kg per household per annum. (Ranked 4th of 22, median 246 kg, highest 374kg). Of this total, 25,940 tonnes was recycled which represents a diversion rate of 95% (Ranked 1st of 22, median 69%, highest 95%)

Residual Waste

- Total net service cost - £49.14 per household served.
Ranked 3rd of 22, median cost £73.52, lowest £40.75.
- Collection Cost – £23.99 per household served
Ranked 8th of 22, median cost £28.25, lowest £14.06.
- Post collection costs - £25.15 per household.
Ranked 3rd of 22, median cost £40.55, lowest £22.67.



What can I recycle?



Paper



Plastic



Cans



Cardboard



Glass



If you have a brown bin for recycling - please place items loose in the bin and refrain from placing items in bags.

DO NOT place items listed below in your recycling container:



Crisp packets



Textiles



Toys & hard plastic



Nappies



Animal excrement



Black bags



Electrical items



Garden waste

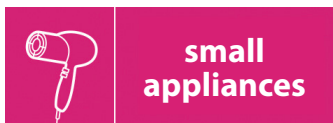


Food waste

Carrier bags & plastic film/wrap



The following items can be taken to one of our household waste recycling centres:



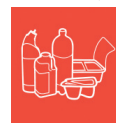
small appliances



discs



scrap metal



plastics



batteries



tetrapak



textiles



garden waste

Failure to recycle or placing inappropriate materials in your recycling container may result in prosecution.



Beth allaf ei ailgylchu?



Papur



Plastig



Tuniau



Cardbord



Gwydr



Os oes gennych fin brown ar gyfer ailgylchu - rhwch eitemau yn rhydd yn y bin a pheidwch â rhoi eitemau mewn bagiau.

PEIDIWCH â rhoi yr eitemau a restrir isod yn eich cynhwysydd ailgylchu:



Gellir cymryd yr eitemau canlynol i un o'n canolfannau ailgylchu gwastraff tai:

	offer bach		disgiau		metel sgrap		plastig
	batris		tetrapak		tecstilau		gwastraff gardd

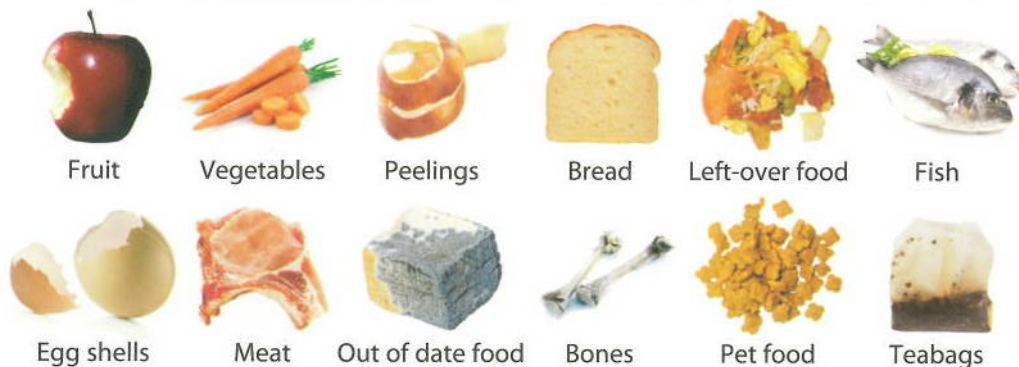
Gall methu ag ailgylchu neu osod deunyddiau anaddas yn eich cynhwysydd ailgylchu arwain at erlyniad.

Food Waste

CONTACT CENTRE
01443 866533

The green caddies are for your food waste. Use the small 5 litre kitchen caddy to store your food waste inside before emptying into the large 23 litre caddy for outside storage and collection. Please put your food waste caddy on the kerbside at the front of your property by 7am on your scheduled collection day.

All cooked and uncooked food waste can be placed in your food caddies.



3 steps to a cleaner, greener environment



1 Scrape waste food from plate onto double sheet of newspaper.



2 Place folded paper parcel into small caddy.



3 When full, empty small caddy into large caddy ready for collection.

Alternatively, line the inside of your small caddy with a double sheet of newspaper and transfer to the caddy when full. You could also purchase compostable liners from an approved stockist.

**PLEASE MAKE SURE ALL PACKAGING IS REMOVED.
PLEASE DO NOT PLACE FOOD WASTE IN PLASTIC BAGS.**

A greener place
Man gwyrddach





SERVICE AWARDS 2014



(Supported by the MJ)

Section One: - Contact Details

Contact Name: Nicole Kirke

Position: Trainee Waste Management Officer

Authority / Organisation: Caerphilly County Borough Council

Address: Caerphilly County Borough Council
Waste Management
Tiryberth Depot, Unit B5
New Road
Hengoed
CF82 8AU

Telephone: 01443 873715

Fax Number:

E-Mail: kirken@caerphilly.gov.uk

**Submission Title: Caerphilly's Waste Management Team of 2014
(Essential)**

Please note that exact copies of the same submission can not be entered into multiple categories.

Section Two: - Details of Award Categories

Please tick/mark relevant Category of entry for this submission.

Generic Categories: -

- | | |
|--|--------------------------|
| 1. Best Employment and Equality Initiative | <input type="checkbox"/> |
| 2. Best Housing & Regeneration Initiative | <input type="checkbox"/> |
| 3. Best Efficiency Initiative | <input type="checkbox"/> |
| 4. Best Health and Well-being Initiative (inc. Social Care) | <input type="checkbox"/> |
| 5. Best Partnership Working Initiative | |
| (a) Public / Private Partnership Working | <input type="checkbox"/> |
| (b) Public / Public Partnership Working | <input type="checkbox"/> |
| (c) Public / Voluntary Partnership Working | <input type="checkbox"/> |
| 6. Best Community & Neighbourhood Initiative (inc. Community Safety) | <input type="checkbox"/> |
| 7. Best Information Technology & Communication Initiative | <input type="checkbox"/> |
| 8. Best Renewable Energy & Energy Efficiency Initiative | <input type="checkbox"/> |

Internal Service Team of the Year (Individual Categories): -

- | | |
|--|--------------------------|
| 9 . (a) Construction and Building Service | <input type="checkbox"/> |
| (b) Catering Service | <input type="checkbox"/> |
| (c) Building Facilities Management Cleaning Service | <input type="checkbox"/> |
| (d) Highways, Winter Maintenance & Street Lighting Service | <input type="checkbox"/> |
| (e) Transport & Fleet Service | <input type="checkbox"/> |

- | | | |
|-----|---|-------------------------------------|
| (f) | Waste Management and Recycling Service | <input checked="" type="checkbox"/> |
| (g) | Streets Cleansing and Streetscene Service | <input type="checkbox"/> |
| (h) | Parks, Grounds & Horticultural Service | <input type="checkbox"/> |
| (i) | Sports, Leisure & Cultural Service | <input type="checkbox"/> |

Section Three: - Guidance Notes

As a general guide, submissions should be no more than 2080 words in length including any appendices which must be incorporated into this single document (this excludes the **953 words** contained within this actual template document). **The overall file size should be no larger than 2 megabytes (maximum).** Please note that the balance, depth and range of detail contained within each section is completely at the discretion of the entrant.

The submissions for any of the first nine categories should encompass: -

- **A description of the initiative (highlighting innovation, imagination & ambition)**
- **Why it was set up giving evidence of a good clear strategy for the project**
- **How does it work**
- **Evidence of good management & clear communication to stakeholders**
- **Good leadership in addressing challenges & creativity in overcoming challenges**
- **Evidence it achieved or is achieving what set out to do**
- **Shows value (e.g. value to customers, value for money or value to service)**
- **Benefits to customer/citizen**

The submissions for Best Service Teams should show in all cases that the team as well as the points outlined above: -

- **Deliver the best service possible**
- **Deliver in the spirit of continuous improvement**
- **Work as a team with other services and partners**

Generally, successful submissions will: -

- **Be clear, easy to read and well laid out**
- **Focus on content (pictures etc. can be used but content is paramount)**
- **Contain relevant, succinct appendices e.g. from partners or customers**

And most of all, don't forget the basics. The judges will be looking for clear evidence that your initiative / team meets the criteria and examples of excellence and targets exceeded to select the winning entries. They will also take into account any visible benchmarks of achievement such as independent auditor's reports, achievement of IIP or ISO 9000 etc. Finally, winning submissions will be able to demonstrate evidence of excellence in continually working to challenge internal/external benchmarks.

For general information, the following guidance on each section should be noted: -

Submission Summary

A short summary of 80 words or less which will be used within the APSE awards brochure should your submission be successful in reaching the finals.

Section Four: Executive Summary

A short one/two page critique of the key points from the overall submission.

Section Five: Background

An overview of the Initiative (categories 1 to 8) or Service (category 9) detailing the historical context and the key issues identified for action.

The section on background should contain details on: -

- Why the initiative or service development was instigated?
- How does it work?
- Initial aims and objectives
- Initial challenges or barriers

Section Six: Improvements Achieved & Challenges Overcome

Section six should promote the achievements of the initiative or service through a range of source evidence including customer feedback, performance outcomes, internal/external benchmarks etc.

Simply,

- What have the benefits been to the organisation?
- What have the benefits been to individuals?
- What benefits have been witnessed by the customer/citizen?

Submissions for one of Service Team categories should also demonstrate that the team: -

- Deliver the Best Service Possible
- Deliver in the Spirit of Best Value
- Work as a Team with other Services

Section Seven: Future Targets & Goals

Please detail your targets for the future and the framework within which they will operate.

Supplementary Evidence & Documentation

Please note that all supplementary evidence and documentation must be electronically incorporated into this actual template.

Awards 2014

Presentation of all the Award categories will be made at APSE's Annual Dinner at the National Seminar and Exhibition in **Nottingham, September 2014**.

If you require any further guidance or support in completing this electronic submission please do not hesitate to contact the APSE office on 01698 459 051.

Please note that all submissions should be forwarded electronically to lmcnab@apse.org.uk by 11 April 2014.

Please enter a summary of your submission below which should be a maximum 80 words. Should you be successful in reaching the finals of these awards this summary will appear the service awards brochure which will be issued to delegates at the awards dinner and which will subsequently appear on the APSE website. Summaries which exceed 80 words unfortunately will not be able to be placed in the awards brochure on the night.

Submission Summary

Caerphilly County Borough Council can undoubtedly always be found at the top the recycling tables for our outstanding achievements. Our efficient and effective services are complimented by growing customer satisfaction levels. Our achievement is no doubt a result of the tremendous service provided by our *"friendly, helpful and efficient"* team who are *"a credit to Caerphilly Council,"* delivering an *"admirable service in best value"*.

Section Four: - Executive Summary

Year on year services are enhanced at Caerphilly County Borough Council (CCBC), which corresponds with our continuous increase in recycling rates. Our improvements over the past year can undoubtedly be described as exceptional and our **"Double Award Winning Team"** continues to grow stronger each year!

In 2009 a major service change was introduced and recycling rates significantly increased from the lowest level in Wales in 2007/08 to reaching 'top of the tables' at present. As a result, we have become one of the top authorities in Wales. Leading the way, we provide an outstanding service and 'go the extra mile,' creating a 'feel good factor' for our communities.

Recycling and reuse continues to be enhanced at our top performing Household Waste Recycling Centres as a result of efficient management systems and increasing public satisfaction. All sites have been awarded ISO 9001-2008 and all operate to the WISH criteria. Plans in line with the Waste Hierarchy to significantly increase reuse at the sites has begun.

The team continue to build successful working relationships with a variety of service areas and departments. Year on year these relationships grow and new partnerships are always being formed. We also provide key support and guidance to outside organisations, including the third sector. Additionally, increasing our presence at

events within the community is important for our increasing levels of recycling and customer satisfaction.

Opportunities to gain qualifications and increased training facilities are always encouraged as they bring new and creative ideas to the team, advancing our services and improving efficiency to deliver in best value. We believe our 'top of the range' staff are at the centre of our success.

As an authority, we do not stop at targets, which are demonstrated by our outstanding recycling figures. Continuous service improvements will make this reality for 'our' Caerphilly. Our vision is to achieve a high recycling community by 2025 and ZERO waste to landfill by 2050.

Section Five: - Background

"We Love Recycling!" That's what Caerphilly's Waste Management department was hoping to hear from residents after the introduction of a fresh new service introduced in October 2009. This new service consisted of a weekly recycling collection including food and garden waste allowing over 80,000 residents to recycle waste at their doorstep and a fortnightly refuse collection.

It was clear that change was needed. Caerphilly had one of the poorest recycling rates in Wales in 2007/08 at 26%, meaning the majority of waste ended up in landfill. However, since then significant improvements have been made and this is the result of the ambitious service change and service enhancements the department has made. Feedback suggested that this fresh new scheme is easier and user-friendly and a recent survey found that 97% of residents prefer the new service.

Success shortly followed, in 2009/10 Caerphilly achieved the fourth highest recycling rate in Wales at 44%, well above the Welsh Government target of 40% and

the all-Wales recycling rate of 39.3%. Improvements continued into 2010/11 to 51% and public satisfaction with all recycling services has reached its highest level of 94.2% in 2013.

More impressively, in 2013/14, Caerphilly achieved an outstanding recycling rate of 59.42%. Therefore, remarkably, we have already exceeded the 2015/16 milestone of 58%. We're keeping the momentum going demonstrating our hard work and dedication as a team and a 'recycling community.'

Aims and Objectives

Wider Council Aims:

Our team has a clear vision to "improve the quality of life in our communities by making communities more sustainable, improving community pride, confidence and striving for excellence and continuous improvement in community health and well-being."

Through the delivery of efficient public services in a sustainable manner, in unity with legislation, national policies and business priorities we can achieve continuous improvement. By ensuring our borough is a clean, safe and well serviced area in which to live, work, invest and visit we can boost community pride and guarantee the long-term prosperity and development of the area.

Objectives:

Through our corporate service improvement plan, the department continuously works to achieve excellent standards by setting internal and external benchmarks through performance indicators (Appendix 1). To meet the wider council aims of our plan we:

- Will continuously work to increase the number of properties participating in the kerbside recycling schemes to reach a participation rate of 79% by the end of 2014

- Will reduce the total percentage of biodegradable municipal waste sent to landfill to 39% by the end of 2014
- Will increase the total percentage of Household Waste Recycling Centre waste recycled, reused or composted to 93% by the end of 2014 through the continued sorting of materials
- Will continue to exceed Welsh Government targets
 - 58% by 2015/16
 - 64% by 2019/20
 - At least 70% by 2025
 - **ZERO** waste to landfill by 2050
- Will continue to increase the activity of Waste Advisory Wardens and communication to target low/non-participating areas through education and awareness raising
- Will further improve public satisfaction levels with recycling from 96% to 97% by the end of 2014
- Will reduce the net cost of refuse collection per tonne by making efficiency savings and streamlining services and reducing our Carbon Footprint

Initial challenges and barriers

Pressures on diminishing resources

Finances are under an unprecedented level of pressure. Operations are becoming more expensive at a time when budgets are under stress. This trend, when combined with increased fuel prices, the continued need to find efficiency savings and reduce budgets places severe financial pressure on these services.

Public perception and demands on service

Increasing public perception and demand for services combined with an increase in the number of households within the County Borough places significant pressure on front-line services.

Public acceptance issues

The sustainable waste management agenda relies on the public playing a key role in accepting changes in collection services and the location of waste facilities within the County Borough. Overcoming public opposition to both of these elements therefore remains a key challenge.

Evolving Legislation

Waste management services have endured considerable legislative/policy changes over recent years and this is likely to continue. It is therefore important that service delivery is capable of adapting to these changes.

Increasing levels and impacts of Health & Safety Legislation against a background of stakeholder awareness and opportunities for claims requires a developed and robust approach to risk management. It is therefore crucial that key staff remain focused and trained to the highest level so that services can remain compliant and have effective risk management strategies in place

Sustainability and reducing carbon footprint

All services have a significant impact on sustainability and carbon foot printing. The development of our "greener" fuel strategy and "greener" vehicle procurement remain significant challenges.

Section Six:- Improvements Achieved and Challenges Overcome

Caerphilly's exceptional recycling rates are verification of the hard work put in each and every day by our waste team and the dedication of our green-minded residents. Our results have been achieved even with finances under pressure.

By remaining highly dedicated to continue to **exceed** Welsh Government targets and support the whole of Wales progress towards zero waste to landfill we are overcoming our challenges. Increases have been aided by our ambition, admirable management and effective communications. Service developments and enhancements are complimented by exceedingly high customer satisfaction and increasing recycling rates.

Improved Recycling, Composting, Participation and Satisfaction Rates

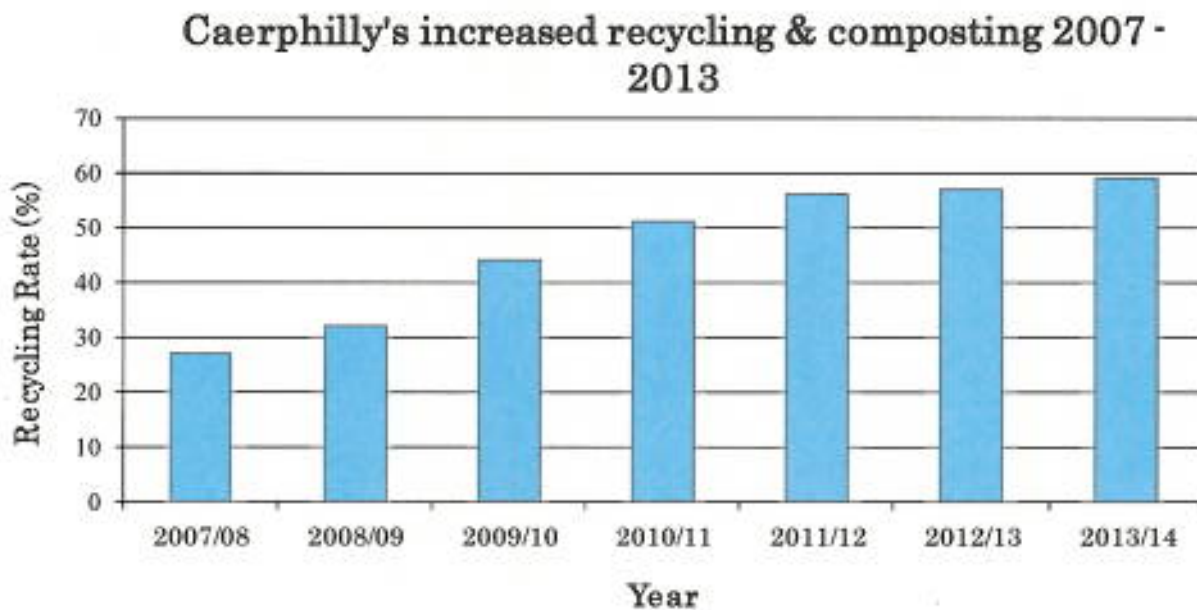
Figure 1 shows our impressive increase in recycling and composting from 2007 to 2013. Figure 5 shows resident satisfaction with our services in the latest household survey in 2013. Figure 6 shows the increase in the number of residents participating in the recycling service from 2007 – 2013.

Through increases in recycling the authority is making significant financial savings through the increasing cost of landfill disposal (gate fess and landfill tax). Also, increases in revenue are achieved through the sale of recyclable materials allowing us to invest more money into services and provide a superior value service for our customers. Closed loop recycling is maximised wherever possible to ensure a better quality material, in line with recommendations from Welsh Government. We are leading the way and creating a cleaner and greener place for our communities to grow. Our ever-improving, resourceful services allow us to continue to develop and achieve our aims, objectives and long-term goals.

By utilising our "user-friendly" service residents feel good about themselves when they participate, giving them a sense of pride and working together for the good of all. Our service has created a "feel good factor" allowing residents to recycle with a smile on their faces because we make it so easy for them to do their bit for their local environment. Over 92% of our residents say recycling is important to them,

72% recycle even if it requires additional effort and 71% recycle everything they can. Our team work exceptionally hard to achieve these outstanding reviews.

Figure 1 – Increasing recycling rates 2007 – 2013



First Class Service

Our services have been described as a *"flagship that should be adopted by all councils."*

Our customers are of significant value to us and this is revealed through the pleasing results of our public satisfaction surveys. Satisfaction with our recycling service has increased by 23% since 2007 and in 2013 satisfaction levels with all services did not fall below 89% (Figure 5). These improvements would not be possible without the commitment and enthusiasm of our *"pleasant, friendly, efficient, helpful, and polite"* team who have been described as a *"credit to Caerphilly Council"* providing a service where *"nothing is too much trouble"* and doing a *"marvellous job, going*

far beyond what is expected and making Caerphilly a lot more pleasant.” We believe this is the reason we are able to deliver the best service possible with continuous development.

Figures 2, 3 and 4 Happy, friendly collection crews and another happy resident!



In addition, throughout the year, collection crews work with a 'team spirit' and go the extra mile whilst doing their jobs. They go above and beyond what is expected by getting into the Christmas spirit every year wearing Santa outfits (Figure 4). This

shows their enjoyment at work during the festive period, contributing to their overall health and wellbeing and brings enjoyment for the residents.

Figure 5 Increase in the number of residents satisfied with our services

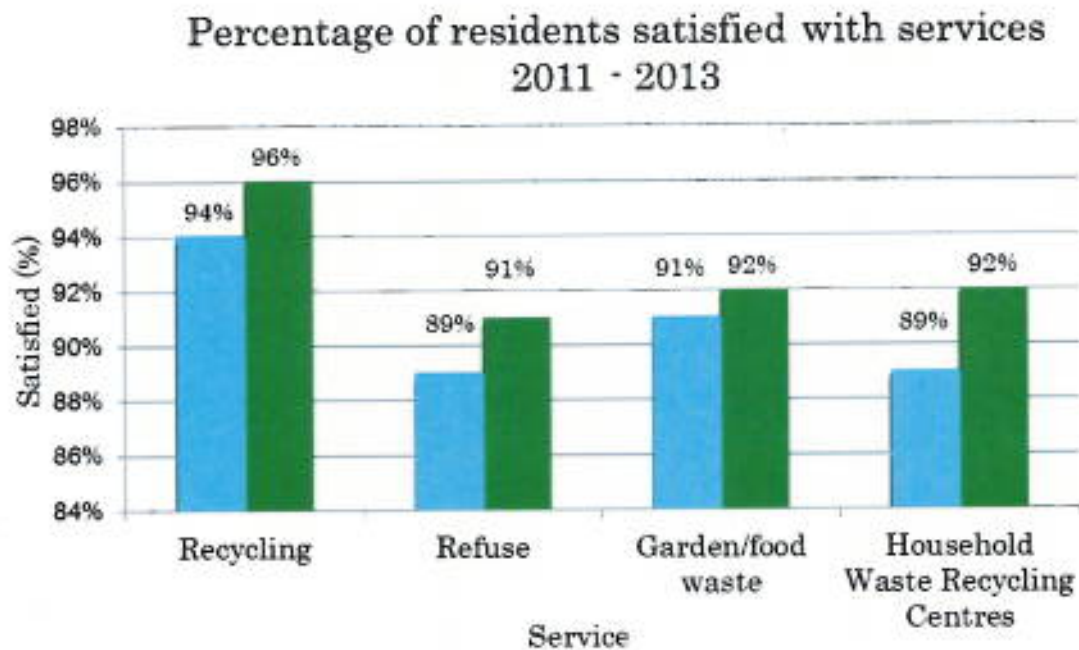
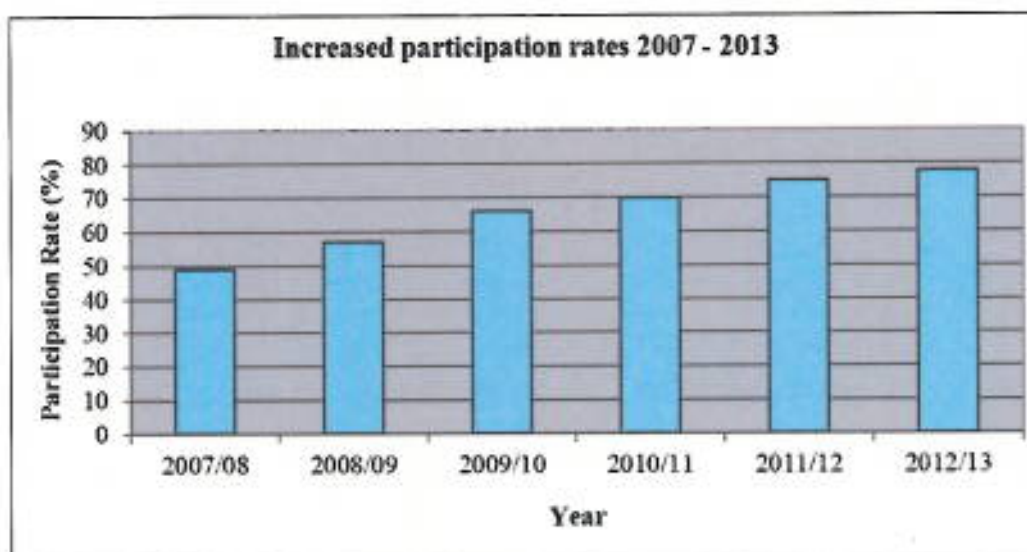


Figure 6 Increase in participation rate 2007 - 2013



Retaining and increasing these figures remains a key challenge as the department relies on the public playing a key role in accepting changes to collection services. However our continuous improvements are testament to the excellent leadership in Caerphilly to overcome these challenges and our ever-increasing participation rates are evidence that we are leading the way forward and delivering an excellent service with continuous improvement.

Appendix 4 provides an in depth detail of compliments received. This demonstrates our commitment to making our communities happy with everything we do and displays the benefits our first class service brings throughout the county borough.

First Class Training Opportunities

Through the delivery of quality training we aim to achieve safe and healthy working conditions for all employees. Competent employees are an essential component to the safe operation and delivery of our services. Training, in all its forms is an integral part of our organisation's strategy, closely tied to our business plan, which is regularly assessed, reviewed and revised. We actively encourage the ongoing training and continuing development of our entire workforce and to achieve a clear demonstration of individual competence.

We offer a range of Apprenticeships in Sustainable Resource Management and NVQ's in recycling operations, leadership, front line management and communication. We believe a skilled workforce is vital for meeting our challenges and pressures.

Benefits of training and additional qualifications to the department and the individual:

- Promotes sustainability and environmental good practice

- Developing and maintaining working relationships with colleagues and others
- Working in a manner that underpins effective performance
- Can bring new ideas and creativity, improving efficiency and streamlining operations, which in turn saves money
- Creates job satisfaction and confidence providing a better service to residents
- Development of personal skills and knowledge

These benefits have a knock-on-effect to the overall service. We believe 'happy staff' provide an enhanced service.

Community Engagement

To complement our kerbside service, we go above and beyond our statutory duties to provide an even better package – we go the extra mile. The team regularly delivers workshops and presentations to schools and local community groups to raise awareness and overcome challenges/barriers. We also support all National incentives such as Real Nappy Week, Recycle Week and Compost Week and each year we increase our presence within the community, targeting a wider area and variety of locations.

Cookery demonstrations (in partnership with Waste Awareness Wales) (Appendix 3)

Through communications, advice and cookery demonstrations we inspire the public to reduce food waste by emphasising the environmental and cost benefits of keeping organic waste out of landfill. We demonstrate creative ways of reusing leftover food safely and healthily every year at various locations throughout the borough targeting a wide variety of people and groups.

Residents

We work collaboratively with residents by encouraging them to take part in new initiatives. The "Waste Free Challenge" is an excellent example of this partnership and is part of our ongoing efforts to reduce waste. The aim is for residents to gain hands on experience at implementing the 3R's and it goes above and beyond what is expected, we go the extra mile.

We also deliver presentations to community groups across the area including Brownies, Scouts, Churches and Charity groups such as Parkinson's, to get the whole community of Caerphilly on board.

Teamwork and Partnerships

We have a proven success of working in partnerships which has significant benefits to our department and the entire community, including outside organisations.

The Big Spring Clean

Now in its third year, the Big Spring Clean is about showcasing and celebrating the county borough's stunning scenery and natural beauty. Last year, over 49 tonnes of litter, recyclables and fly-tipped waste was collected during the 3-month long initiative. The initiative is widely advertised to ensure all have the opportunity to get involved and do their bit for their environment.

Residents, community groups, schools and officers from the team work collectively by grabbing their litter pickers, spades and wheelbarrows and join forces for the Big Spring Clean. The initiative encourages people to take pride in their local environment by getting involved in clean-up projects, helping to make Caerphilly an even cleaner and greener place.

Outside Organisations

The team (and the authority as a whole) provide key support and guidance to outside organisations such as the Community Furniture Enterprise (CFE). The CFE is a third sector organisation where household furniture can be re-used and sold back into the community. The department provided key support to the CFE in November 2011 during difficult financial times, which undoubtedly saved the business. Statement from the CFE website:

"Since the inception of the Community Furniture Enterprise in 1999, Caerphilly County Borough Council has been a key supporter and partner."

Community Repaint Project

Our prosperous partnership with the CFE has led to the development of a brand new initiative - The Community Repaint Reuse Project. This innovative project will involve water-based paint collected at Household Waste Recycling Centers being offered for sale to the public. It is thought that an exceptional 60% of the paint is reusable. The Project shows potential to make a saving of around £7,000 - £10,000 a year in this area – money that can be spent on improving services and the wider area.

In House Recycling

At Caerphilly we believe in the importance of *'practice what you preach.'* Staff located in offices throughout the borough are provided with adequate advice and facilities to recycle and prevent waste. Through educational and inspirational visits we work productively with various departments inspiring staff to implement the 3

R's. Our efforts are paramount and will have a significant impact on the volume of waste produced in South East Wales.

We also continue our work in collaboration with Catering throughout the authority (including schools) to implement food waste and dry recycling in canteens. Working together continues to increase our overall recycling rates.

Schools

Following the successful introduction of recycling for paper, plastic, cans, batteries and food, recycling is now second nature to the teachers and children. We have also provided schools with a free compost bin and 'how to use' handbook so the children can see the benefits of home composting.

Battery Recycling Initiative

In 2011, we introduced a Battery Recycling Initiative, in which schools compete to collect batteries for recycling. In 2013 an impressive 1.5 tonnes of batteries were collected and the winning schools were invited to a special award ceremony to claim their exciting prizes. This year a record-breaking 76 schools have signed up to take part.

Figure 7 Launch of the 2013 Battery Recycling Initiative in Maesycwmmmer Primary School



Kids Go Green

Kids Go Green is an interactive website dedicated to educating children and young people about the importance of environmental awareness and the impact we can all have on the future of our planet if we follow the 3R's, Reduce, Reuse, Recycle. We encourage the children to meet Rhodri the Recycling Ranger, the site's recycling mascot to learn how they can help keep our planet healthy and green. The site has been carefully created by the waste team and the dedicated staff from our internal IT department. With imagination, dedication and drive we have created this amazing site for all to use.

Figure 8 Snapshot of the Kids Go Green Website



Waste Electrical and Electronic Equipment (WEEE) Initiative

The WEEE Initiative involved the authority working in collaboration with 4 Comprehensive schools (4,300 pupils) and CFE. An impressive 2.54 tonnes was

diverted from landfill and sent for reuse/recycling. The aim was to reuse as much as possible; items that were not safe were recycled. An impressive 30% was reused!

Figure 9 Celebrations at the WEEE Initiative



Communications and IT

Our relationship with the communications department continues to grow. Officers continue to meet monthly promoting success and informing residents about approaching events ensuring residents are updated on how well we are performing together. It also gives us an opportunity to give that all-important 'thank you,' which we believe is paramount.

Hospitals and Health Centres

The team continues to work collaboratively with local midwives, antenatal centres and hospitals to educate parents about the financial and environmental benefits of re-useable nappies. These events help us deliver a service with one-to-one contact with our residents to educate and encourage. It also allows residents to feel they have received a 'personal' service giving them the opportunity to ask questions and get involved. An event is planned during April this year at one of our local hospitals

to reinforce these important messages and keep the competitions running to provide parents with the opportunity to win free trial packs, allowing parents to 'try before they buy.'

Household Waste Recycling Centres

We currently operate six top-performing Household Waste Recycling Centres (HWRC). Collectively the sites have a recycling rate of 93% due to admirable management, pleasant front-line service and effective running operations. We aim to expand services by introducing new materials to reuse and recycle which ties in with the new Community Repaint Initiative. Reuse is extremely important as it demonstrates our commitment to drive waste up the Waste Hierarchy. A survey in 2013 confirmed 92% of residents are satisfied with our HWRCs due to the first class, personal service they receive. These figures reflect our continuing recycling increases.

The sites operate in compliance with Waste Industry Safety and Health (WISH) criteria and as a result of six monthly audits; ISO 9001-2008 has been retained due to proactive and effective health and safety management systems. Staff receive ongoing training and qualification opportunities to ensure customers receive the best service. Our top-of-the-range CCTV system has significantly reduced thefts at the sites ensuring we now recover all materials brought to us for reuse and recycling.

Figure 10 – Our helpful front-line staff ensure our residents have a pleasant visit to our HWRCs



Section Seven:- Outcomes and Future Targets & Goals

The outcomes and success of our service and teamwork is evident and victory is clear. There is no doubt that since 2009 the service has flourished and continues to achieve what it set out to do – increasing recycling rates, increase customer satisfaction and increase the overall enjoyment of our communities living with the Caerphilly County Borough. Despite initial challenges we have worked together as a community continuing to achieve our aims and objectives.

Our next main goal is to meet the recycling/composting target of 58% by 2015/16. However, based on our achievement in the first quarter of 2014, we have already exceeded this by 1.42%, demonstrating our commitment We do not settle at the target, we **ALWAYS** go the extra mile.

Furthermore, we aim to maximise participation, taking us beyond the 78% currently being achieved.

Our vision is to achieve zero waste to landfill by 2050 and to achieve this we will continue to deliver efficient and resourceful services. We will continue to take the lead setting positive examples to the rest of Wales and the UK as a whole.

APPENDIX 1
SERVICE
IMPROVEMENT
PLAN (INTERNAL
BENCHMARKS)

D	PI ref	EVIDENCE / INDICATOR	12/13		13/14		Progress / Comments	14/15
			Target	Result	Target	Result		Target
1	WMT 008ii	The percentage of municipal waste recycled	40%	39.56%	40%		Due to the introduction of Q100 in Waste Data Flow (WDF) and a change in the method of reporting some of the wood material is included in the composting figure The result for 12/13 has been taken from WDF but has not been signed off by the Data Compliance Team and could be subject to change.	40.5%
2	WMT 008iii	The percentage of local authority municipal waste collected as source segregated bio wastes and composted or treated biologically in another way	16.5%	17.42%	17.5%		Some of the wood material that used to be included in the recycling figure is now classed as compost. Result could be subject to change as above.	18%
3	WMT 008i	The percentage of local authority municipal waste prepared for reuse	0.10%	0.09%	0.10%		Continued support of GC (Groundwork Caerphilly) Enterprises with the possibility to extend partnership of reuse of WEEE (Waste Electrical and Electronic Equipment). Result could be subject to change as above.	TBC
4	WMT 009	The percentage of municipal waste collected by local authorities and prepared for reuse and/or recycled, including source segregated bio wastes that are composted or treated biologically in another way	56.6%	57.07%	57.5%		As points 1, 2 and 3 above.	56%
5	WMT 004	The percentage of tonnage of municipal waste sent to landfill	39% 38,500	41.7% 41,083	40% 39,500		Difficult to set accurate targets due to unknown waste growth factors. There was a large reduction in waste during 11/12. This does not appear to have continued into 12/13 but overall there is a downward trend (over the past 5 years). Result could be subject to change as above.	38,500
6	WMT 007	The total percentage Civic Amenity Site waste recycled, reused or composted (including rubble)	90%	93%	93%		Increase due to the continued sorting of the materials at site and the inclusion of rubble in the measure. Result could be subject to change as above.	93%
7	WMT 002	The total percentage of biodegradable municipal waste sent to landfill	37%	39.76%	38%		The tonnage targets are prescribed by Welsh Government. There was a large reduction in waste during 11/12. This does not appear to have continued into 12/13 but overall there is a downward trend (over the past 5 years). This is a cabinet priority indicator and CCBC have set this years target to 39%. Result could be subject to change as above.	38%
8	LB WM PI 1	The percentage of properties participating in kerbside recycling	76%	78%	78.5%		Increase due to the activity of Waste Advisory Wardens and communications. Further improvement difficult due to a high percentage already being achieved.	79%
9	LB WM PI 2	Net cost of refuse collection per household	£16.81		TBC		Target will be set when 2012/13 financial figures are known.	TBC
10	LB WM PI 3	Net cost of refuse collection per tonne collected	£54.10		TBC		As above.	TBC

APPENDIX 2

**IN THE
PRESS**



Recycle Right!

Thanks to your help, Caerphilly is leading the way in Wales with its recycling efforts.

In December it was revealed that Caerphilly was 2nd in the Welsh recycling league table, recycling an impressive 59.9% of waste in our county borough! Our award-winning efforts are made possible thanks to the ongoing support and co-operation of residents across the area.

It is important that you only dispose of recyclable material in your recycling bin to avoid cross-contamination. The most common issue we face is food waste being incorrectly placed in the recycling bin. Food waste must only be placed in your food waste caddy for collection.

If any items in your brown recycling bin are not able to be recycled, a leaflet will be provided detailing which items need to be removed before it can be collected on the next collection day.

For a full list of items that can be recycled visit www.caerphilly.gov.uk/recycling



Cleaner and greener

- We continue to lead the way in Wales with a Recycling Rate of 60.44% (April – Sept 2013).
- Our waste management team scooped 5 prestigious national awards in 2013.
- 76 Schools signed up to taking part in a new Battery Recycling Initiative.
- 61 have also become Eco Schools by proudly displaying a 'Green Flag'.
- Kids Go Green! – New interactive website launched <http://your.caerphilly.gov.uk/kidsgogreen/>



- There are very high levels of satisfaction with all aspects of recycling & refuse services.

Batteries Recycling in Caerphilly

The Battery Recycling Scheme organised by Caerphilly County Borough Council and ERP UK is going from strength to strength. The competition, which sees schools compete against each other to recycle the most batteries, recycled 1,255kg of batteries across 45 participating schools in 2012. The 2013 competition involved 59 schools, and an impressive 18,900 pupils, who collected a total of 1,511 tonnes of batteries for recycling. Once again, ERP supplied the prizes for the winners and runners up.

National Recycling Week

8 June 2013

To promote the 10th anniversary of National Recycle Week in Wales Caerphilly County Borough Council's Waste Management Team will be out and about promoting recycling.

In the past 10 years Caerphilly County Borough Council has seen recycling figures rise by a whopping 900% and is one of the leading local authorities in Wales for Recycling Rates.

To help get the Caerphilly County Borough to the top the waste management team will be at Pontlottyn square on Tuesday 18th 10am - 1pm and Tesco, Ystrad Mynach on Thursday 20th 10am - 1pm. Here they will be able to give out helpful tips and advice on recycling, reuse and reducing waste.

Mr Dave Poole, Cabinet Member for Community and Leisure Services said "I'd like to thank our residents who through their efforts in recycling are helping us increase our recycling rates year after year. Don't forget when thinking about recycling, don't just think about the kitchen. We accumulate rubbish from every room in the house, much of which can be recycled – think about toilet roll tubes in the bathroom, clothing tags and cosmetic boxes in the bedroom and newspapers and magazines in the lounge – all can be recycled."

Andrew Osborne from Waste Awareness Wales offers some advice on how you can do more "The best thing you can do with food waste is not to produce it in the first place by planning your meals in advance and also by using any leftovers creatively. Planning meals can save up to £50 a month for a typical family."

For leftover recipes, tips and advice visit www.lzvelocodhatewaste.com

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For more information on recycling can be found at www.caerphilly.gov.uk/recycling

For information about recycling in the whole of Wales go to www.wasteawarenesswales.org.uk



APPENDIX 3
ADDITIONAL
PHOTO
EVIDENCE

LFHW cookery demonstrations



Free compost bins for schools



Launch of Kids Go Green



Handing out Bags for Life in the community



Launch of food waste recycling in schools

Battery Recycling Initiative celebrations at one of our schools



APPENDIX 4

COMPLIMENTS

Customer Testimonials

From	Date	Comment
Resident	31/01/2013	I would like to praise the refuse collectors who come to this address. My two recycling bags had been ripped open this morning, leaving a dreadful mess. Before I was able to re-bag it, your men arrived and cleared it all onto the truck. Fantastic, thank you very much. I have now requested a brown recycling bin to avoid this in the future. The men are always pleasant and polite, nothing is too much trouble, and they are a credit to Caerphilly Council.
Resident	21/02/2013	I just wanted to send a quick email to say a big thank you to the team that collects litter from the roadsides; their efforts have not gone unnoticed/ unappreciated. I live in Energlyn Parc and "in the old days" the drive up Heol Las was pretty grim as there was rubbish everywhere; these days it's spotless. I am always pretty quick to complain when things go wrong so I thought I should make an effort to give praise where it's due. I just wanted to say that they do an excellent job at making the environment in Caerphilly a lot more pleasant. Anyway, please could you pass on my comments to the team responsible? Kind regards,
Resident Via Customer First	27/02/2013	Resident from Lewis Street Ystrad Mynach rang to say thank you for clearing dog fouling in her street so promptly
Cwmfelinfach Allotment Association Secretary	04/03/2013	On behalf of the Cwmfelinfach Allotments Association, I would like to take this opportunity to thank you all so very much for the assistance you provided us, with the cleaning up of the Cwmfelinfach Allotments "rubbish." The crew you provided was extremely helpful and courteous and worked so hard to help us clear this rubbish, which would have proven very difficult for us without your help. On behalf of the Committee I would like to give our appreciation of your service, it was a great help. Once again many thanks.
Resident	06/03/2013	I have just received a telephone call from a lady and she wished to praise one of your street cleaners. She only knows his name is Clive and he services the Gilfach/Bargoed area. She could not praise Clive enough and thinks he should be given recognition for his hard work. What a lovely phone call to take
Resident	08/03/2013	Resident has asked that his appreciation be passed on to the relevant crews for the excellent service they provide.
Resident	27/03/2013	A resident from Old Bedwas Road called to thank you for keeping Old Bedwas road so clean. Very impressed with the man who is picking up the rubbish.
Visitor	12/04/2013	My wife and I brought our seven year old grandson for a three-day stay in Caerphilly last weekend (5 th – 7 th). The weather was an added bonus, of course, being very Spring-like, but we were incredibly impressed by Caerphilly Borough in general. Don't know what residents' comments might be, but certainly from a tourist viewpoint it was excellent. The town was clean, and the services which we received were provided with consistent polite and friendly efficiency. Our previous visit with our own children – must be close on twenty years ago now – was equally impressive, but our experience of revisits to places previously enjoyed have often proved somewhat disappointing. Most definitely NOT in this case, however. I hope that you have some mechanism for informing your staff of well-deserved positive feedback since they are all, unquestionably, a credit and a distinct asset to the authority. So, thank you and VERY well done Caerphilly Borough Council – long may your success continue!
Resident	08/05/2013	I thought I would write a quick email to yourselves about the gentleman how keeps Senghenydd clean around the Windsor hotel and Ysgol Ifor Bach, Every morning rain or shine he greets me and my son with a good morning and a smile as well as a quick chat about the weather. Never have I seen him looking down he must constantly be in a good mood, he probably don't have to stop and say hello but he does an I just thought someone who goes that extra mile in their job should get some recognition as people are to quick to complain about poor customer service but hardly ever mention good customer service.

		Many Thanks
Resident	15/05/2013	My husband and I would like to express ore appreciation of the wonderful service given to us. Their kindness and consideration to us has been wonderful. The area always do polite and helpful, a marvellous service. Please thank them on our behalf
Specialist nurse for resident	24/05/2013	My name is Patricia and I am a Children's palliative care nurse working for Aneurin Health Board. I care for a family in Caerphilly with a seriously ill child. He requires a high level of complex care and equipment. The family have recently had problems with their collection of waste primarily from a private company adding to the family stress. I contacted Mr Ian Jones in waste management today to see if he could help. Within minutes he had a solution for me and was able to action it immediately with the bin men helping too. The family rang me amazed and delighted within a couple of hours saying they had a new bin. This is a fantastic result and I am really impressed and grateful with the service.
Resident	10/07/2013	I would just like to say that the 3 men who just emptied the green bins in Gwyn Drive Churchill Park are true assets to the council. no matter what the weather they are always here the same time to empty the bins, as a little thank you to them I took all 3 of them pints of water out to them as they came to my house, the 3 of them where so grateful and thankful it made my day. Once again they are an asset to you. It's great to see Residents sharing how happy they are with Council services on Social Media.
Resident	13/08/2013	As I am always passing on troubles to you, thought it would be nice to pass on some praise just received for the refuse /recycling crew covering Aberbargoed. Mrs Griffiths of Highfield Crescent said she is delighted with the service, with her garden waste sacks and food caddy being returned over the gate every week. She says as an elderly resident this makes her life a lot easier and feels CCBC give an excellent service. Well done crew!!
Resident	20/08/2013	Mrs Davies, aged 87, has rung to say thank you to the crews who have been assisting her since she broke her arm. She wants to pass on her gratitude for all they are doing, collecting and returning bins and recycling boxes.
Resident	28/08/2013	Just wanted to let you know how helpful the staff at the Full Moon recycling centre were over the weekend. We are in the process of renovating a house and I made several trips to the site. There were two members of staff who were particularly helpful, Gareth and Robert.
Resident	03/09/2013	I just wanted to say a big thank you to the Green collection crew who must have collected from our house a few weeks ago (Lewis Street, Machen). I had run out of refuse bags and had not been able to bag up all of the hedge cuttings so these were left near the bags. However the team must have collected both the loose and the bagged rubbish, which I'm sure, is above and beyond. Just wanted to say thanks very much – I'd appreciate it if my thanks could be passed to the relevant department. Thanks again
Resident	25/09/2013	I would just like to say I huge thank you to the staff at the Llanbradach recycling centre. They were friendly and very helpful.
Resident	10/01/2014	I had a call from the above resident today to thank the refuse crew, practically Gareth and his supervisor for finding and returning her mobile phone to her today and to say the refuse crew always do a great job on her street. Please can you pass on the thanks to the crew.

Please email
all entries to:

[Imcnab@aps
e.org.uk](mailto:Imcnab@aps
e.org.uk)

by 11 April
2014

1. Reasons for and impacts of variations in collection service

- 1.1. The power of LAs to select and specify containers is set out in Section 46 of the Environmental Protection Act 1990. Therefore, the underlying reason why there are variations in collection service is because Government believes that LAs must make the decisions regarding the services they have a duty to provide.
- 1.2. Decisions are based on factors such as the proximity of waste facilities, local housing and infrastructure, the timing of contracts expiring, corporate priorities, Government strategy, prevailing waste theory and the availability of funding. In Denbighshire, the key decisions in these areas have been made based on these and the following factors: -
- 1.3. **Receptacles:** In 2006, started switching residual waste collections from sacks to bins. Key factors were that the public wanted bins as seagulls and other scavengers caused problems with sacks. Bins are a practicable way of avoiding potentially hazardous manual handling and therefore a duty of the LA as an employer. At a time before food waste was collected separately, the Council felt bins were the only acceptable container for fortnightly residual waste collections.
- 1.4. **Frequency:** With a few exceptions, residual waste collections in Denbighshire are made fortnightly. In 2006, the evidence was clear that the reduced collection frequency was a key driver in improving recycling rates. Also, as more waste is recycled, collecting residual waste fortnightly is an effective and appropriate efficiency measure to take.
- 1.5. **Recycling:** Despite operating a “good” kerbside sort scheme, the Council could not ignore clear evidence that mixed recycling collections captured significantly more material. Because the statutory recycling target was set so high, the higher recovery of mixed recycling schemes could not be ignored (a 60% target might have been considered achievable). Coupled with acceptable cost projections and the duty to avoid manual handling referred to above, meant the Council could not justify doing anything other than to collect recycling in a wheeled bin.
- 1.6. **Garden waste:** In 2006, WAG had a specific target for the composting of waste which is why Denbighshire introduced a free collection service funded through the efficiencies achieved in residual waste collection and SWMG. A small 140 litre bin was selected for garden waste to limit quantities collected, but still achieve the WAG target.
- 1.7. **Colours:** Black bins for residual waste and green bins for garden waste are self-explanatory. Blue has long associations with recycling so that was the colour chosen for the recycling bins. Orange was selected for food waste because it was a bright colour, not typically associated with other waste types. The caddies are easy to see in dark mornings. Coincidentally, orange was later selected as the colour of food waste bins at the London Olympic Games in 2012.
- 1.8. The result of the differing systems is a creative and innovative approach to waste management in Wales today and is driving the best performance in the UK. It cannot be argued that the current approach is not working.
- 1.9. A single, uniform approach set out by WG dictat, like the *Blueprint*, might represent the “cutting edge” in waste theory at a given point in time. However, resource management theory is constantly evolving and it is hard to see how a national Waste Collection Authority could deal effectively with local circumstances.

- 1.10. In the June edition of *The Loop* (the journal of the Local Authority Recycling Advisory Committee) The Minister, Alun Davies AM, champions this diversity of approach, saying, “Welsh Councils decide the most appropriate collection systems for their communities...” Denbighshire would agree wholeheartedly with the Minister on this.

2. Alignment with Collections Blueprint

- 2.1 Generally, Denbighshire’s collection system aligns closely with the discretionary *Blueprint* which cites Denbighshire’s use of small 140 litre bins for residual waste. However, Denbighshire uses its discretion to depart from the *Blueprint* in two main ways.
- 2.2 The reasons for using wheeled bins to collect mixed recycling are mentioned earlier. The HSE has itself made this same point in official responses to Government consultations but have not done so in the clearest terms. The *Blueprint* recognises that LAs are “employers and commissioners of services” and that H&S decisions on collection should be made locally – but then goes on to tell LAs what conclusions they must reach!
- 2.3 Denbighshire also departs from the *Blueprint* by offering a garden waste collection that is free at the point of service. Although the specific target for composting has now gone, Denbighshire believes charging could jeopardise the achievement of the 70% statutory recycling target and therefore lead to financial penalties.
- 2.4 The *Blueprint* sets out what was “cutting edge” three years ago; published when some LAs were still collecting residual waste weekly. Wales now has one LA opting to collect residual waste every three weeks and others consulting on monthly collections. In short, it is very much of its time and time has now marched on.
- 2.5 In the past, WAG/WG has adopted various positions which have later been re-assessed in the light of new evidence. *Wise About Waste*, the first Welsh waste management strategy, steered LAs towards MBT (Mechanical Biological Treatment) as a means of residual waste treatment and showcased the use of glass cullet in aggregates: both positions the WG has now distanced itself from. More recently, WAG steered LAs to consider the third sector model for recycling collections, such as the Cleanstream approach used by Newport Wastesavers, but which has proved less successful as targets have become more testing.
- 2.6 In the past, Denbighshire has described such changes of approach as “moving the goalposts” but the ability to switch priorities and change direction is a necessity, and not just for Governments. A national strategy as prescriptive as *Towards Zero Waste* is not helpful to the WG, LAs or any other stakeholder.
- 2.7 Additionally, Denbighshire has long questioned much of the evidence selected by WAG/WG to support its advocacy of kerbside sort schemes. This is clearly illustrated in the *Blueprint* by the claim that Bridgend Council “collect more materials for recycling than authorities using co-mingling”. This was put to the WG at the time but, despite an acknowledgement that the wording used was misleading, no correction was ever made.

3. Availability of Information to Householders

- 3.1 Denbighshire spends relatively little on recycling PR and information: less than any other LA in Wales according to recent WLGA benchmarking data. Recycling just happens to be the way the Council deals with 63% of the rubbish it handles now and, because it is slightly more

complicated than throwing all the rubbish in one bin, the Council provides clear explanatory information and collection calendars.

- 3.2 The right service does not need a great deal of explanation. With the right drivers (i.e. making recycling easy and convenient, and the reverse for residual waste) it is possible to alter behaviour without necessarily going through the expensive business of trying to change attitudes first.
- 3.3 In 2011, 4,223 individuals (the vast majority from Denbighshire) responded to a public consultation to disagree with the proposal that WG should withhold SWMG funding from LAs making mixed recycling collections. These individuals, plus the further 1,173 who signed petitions, that showed support for their simple, convenient recycling service would no doubt be shocked to learn that withholding grant funding is still on WG's agenda.

4. Waste Regulations Route Map

- 4.1 The process outlined by the route map is similar to the approach taken by Denbighshire, and presumably every other LA, when selecting a recycling collection. To a person new to preparing a business case the Route Map sets out the process quite clearly.
- 4.2 Denbighshire is reviewing its services in the light of the Waste Regulations 2012. Early findings suggest that a switch to separate collection is unnecessary to meet quality recycling aspirations. Moreover, given Denbighshire's leading performance, a switch to kerbside sorting could result in a 22% reduction in recycling yields, a reduction of 4.5% on the Council's recycling rate and an additional 2,000 tonnes of residual waste requiring disposal. This is based upon the capture rate for kerbside collected dry recyclables falling to that achieved by the best Welsh kerbside sort scheme (i.e. Bridgend).
- 4.3 The Route Map will probably have minimal impact in itself other than to prompt LAs to undertake a timely review of earlier decisions. For LAs that undertook a robust decision making process in the past there is unlikely to be a change. However, by threatening to withdraw the SWMG funding of any LA switching to mixed recycling the WG is effectively making it impossible for any kerbside sort LA to consider all the options open to it.

5. Relationship between practice and recycling rates

- 5.1 The evidence Denbighshire has gathered indicates that "good" commingled recycling services enjoy greater capture rates or yields than "good" kerbside sort schemes. Is the collection schedule clear and convenient? Do residents understand what can be recycled? Do the collection vehicles turn up? Are suitable containers provided? Is opting out of recycling made difficult by limits on the volume or frequency of collection? If the service is poor then the method makes little difference, but LAs that can run a good service will benefit by offering a commingled collection.
- 5.2 Evidence, such as the data collected after Denbighshire's switch from kerbside sorted to a commingled service, is dismissed by WG on the basis that any "new" scheme will enjoy high participation and capture rates. Unfortunately, there are very few LAs that have switched from a commingled service to kerbside sort; but there is Torbay Council.
- 5.3 Data collected from Torbay appears to show that recycling has flatlined since dropping commingled collections. Prior to the adoption of a kerbside sort service, the Council

provided commingled collection to 40,000 residents and in 2010/11 (the last year of commingled service) reached a recycling rate of 45%. In the calendar year 2013 (the most recent year for which data is available) it can be seen that the kerbside sort service was provided to 60,000 households (a 50% increase) but the recycling rate has increased by just 1% (after food is taken out of the equation).

- 5.4 Some might argue that this is a problem of Torbay's contractor performing poorly, rather than of kerbside sort schemes in general. However, the excellent recovery rates for the food waste scheme would appear to contradict this. In its recent guidance on evaluating recycling schemes, the Welsh Government suggests that the "popularity" of commingled recycling collections cannot be a material consideration when choosing a collection method. However, when there is such clear quantitative evidence to support this popularity by way of improved capture rates, it appears perverse to rule this out.

6. Other Points

- 6.1 Denbighshire's choice of collection system in 2009 appears to have been justified by the Council consistently being the highest recycling LA in Wales.
- 6.2 In response to criticism of their stance on mixed recycling collections a few years ago, WG officials stated that, theoretically, kerbside sorted systems can capture as much of the available material as mixed recycling schemes. Whilst there is no arguing the logic of this theory, several years on there is still no evidence of Welsh LAs using kerbside sort systems to capture recyclate at the levels of the better mixed recycling schemes.
- 6.3 Despite Denbighshire using a mixed recycling approach, the vast majority of materials collected are sent for "high quality recycling" as defined by WG. Since it opened in 2011, Denbighshire has sent all its mixed recycling to the MRF operated by UPM-Kymmene in Flintshire, where the newsprint is used in UPM's own papermill.
- 6.4 It is a fallacy that all mixed recycling is necessarily of low quality and is exported. Being a paper manufacturer themselves, quality of materials is critical to UPM and all the recovered paper and board go into new paper products, over 90% of glass goes for re-melt, aluminium is all sent to Novelis in Warrington, steel to Tata Steel in South Wales and plastics are sorted by polymer and colour and largely enter closed loop recycling at a number of reprocessors, many in the UK.
- 6.5 The knock-on effect of the extremely effective dry recycling collection is that food waste capture rates in Denbighshire are also the best in Wales. It has to be said though, that food waste capture levels are still not high enough.
- 6.6 Denbighshire's households produce less residual waste than any others in Wales. This means less waste goes to landfill and less Landfill Tax being paid to HMRC and Denbighshire enjoys a high margin of safety from WG's Landfill Allowance Scheme fines.
- 6.7 It is a fallacy that mixed recycling collections are more expensive than kerbside sort. WLGA benchmarking information show Denbighshire 8th out of 22 LAs in for dry recycling service costs in 2012/13, which is very good for a largely rural LA achieving high performance levels.

Inquiry into recycling in Wales

Response from: Natural Resources Wales



National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales

Submission by Natural Resources Wales

Summary

- Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling. Welsh local authorities collectively achieved the first target of 52 per cent in 2012-13.
- We are very supportive of the intent of Welsh Government proposals to reduce the amount of waste going to landfill, increase recycling, and improve the quality of recyclates; we responded positively to these proposals within the recent WG Environment Bill consultation.
- Natural Resources Wales has monitored the recycling service outcomes since 2004/05 through our statutory roles. With further significant legislative developments due to come into force later this year that will have an effect on the quality of the recycling services, it may be too early to fully assess the relative outcomes of the different types of local authority recycling service provision.
- The relative timing of the provision of detailed Welsh Government (WG) guidance and the necessary development of the recycling service has contributed to the position we see today in terms of significant variation in methods of service delivery.

1. Role of Natural Resources Wales

- 1.1 The purpose of Natural Resources Wales is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.
- 1.2 Natural Resources Wales is responsible for regulating the waste industry and is principal adviser to WG, adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources.
- 1.3 Natural Resources Wales is the designated monitoring authority for The Recycling, Preparation for Reuse and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011 and Landfill Allowances Scheme (Wales) Regulations 2004. We validate local authority data on a quarterly basis performing a series of data quality checks. Our validation includes cross checks against WasteDataFlow and site return data for landfill, and requests for evidence from local authorities on the final fate of their recovered waste.
- 1.4 The purpose of the Landfill Allowances Scheme is to ensure that Welsh local authorities divert biodegradable municipal waste from landfill. Our measure of data accuracy is published annually in

the NRW Landfill Allowances Scheme Report¹. This includes reporting on the timeliness of data received from local authorities in accordance with reporting deadlines.

- 1.5 The Local Authority Recovery Targets place greater importance on Welsh local authorities to increase the recovery of materials collected and to accurately report data on intermediate sorting facilities, reject rates and end destinations. We work with local authorities to identify and report the end destinations of the waste that they collect, so that only materials actually recycled, prepared for re-use or composted are included in the calculation of their recovery rates. We validate the waste data returns submitted quarterly by Welsh local authorities. Following validation the data is published by StatsWales each quarter. In order for local authorities to meet the recovery targets, they are required to provide us with supporting evidence that their diverted waste has met the relevant criteria. We provide WG with a Local Authority Recovery Target Report which summarises additional validation work undertaken during a scheme year.
- 1.6 We also work with others to provide increased market confidence in the quality of products made from waste and so encourage greater recovery and recycling, for example through the development of quality protocols.
- 1.7 We are also the regulator for the recent changes to the regulatory framework in respect to Material Facilities (MFs). MF operators must notify us if they qualify for the new permit condition (self-assessment) and must start to report specific sampling information to us from 1st October 2014 for us to publish as part of our public register.

2. Current Situation

- 2.1 The total amount of local authority municipal waste in Wales, excluding abandoned vehicles, generated in Wales peaked at over 1.9 million tonnes in 2004-05. It has since been steadily reducing, with 1.55 million tonnes generated in 2012-13. We recently published survey results that estimate industrial & commercial waste generation to be 3.7 million tonnes and construction and demolition waste generation to be 3.4 million tonnes in Wales in 2012. Therefore it is worth noting that local authority municipal waste generation accounts for less than one fifth of the total waste generated in Wales.
- 2.2 In 1998-99 only 5 per cent of all local authority municipal waste in Wales was collected for preparation for re-use, recycling and composting. This has risen to over half of all waste collected by Welsh local authorities in 2012-13. Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling and, collectively, Welsh local authorities achieved the first target of 52 per cent in 2012-13. Individually, 13 of the 22 local authorities in Wales met or exceeded the 52 per cent target in 2012-13. Annex 1 shows each local authority's performance against the 2012-13 target.
- 2.3 Wales has reduced the amount of biodegradable municipal waste (food, paper, and garden waste) sent to landfill by 57 per cent over the last eight full years of the Landfill Allowances Scheme. This clearly demonstrates work to reduce the amount of biodegradable waste being sent to landfill by Welsh local authorities is succeeding. Annex 2 illustrates each local authority's Landfill Allowance Scheme performance for Wales in 2012-13.

¹ <http://naturalresourceswales.gov.uk/our-work/policy-advice-guidance/waste-Policy/landfill-allowance-scheme/?lang=en>

- 2.4 WG has many policies in their waste strategy “Towards Zero Waste” aiming to increase the quantities of waste recycled and the quality of the secondary materials produced as a result. A key element is geared towards improving the use of secondary raw materials (recycled wastes) within industry in Wales and to move towards a circular economy where all waste materials are used rather than disposed.
- 2.5 WG has targeted the wastes collected by local authorities in the first instance because of the high level of government control over this waste stream through the balance of local government finances provided by the WG relative to the council tax payments and additional ring fenced grant money, such as the annual Sustainable Waste Management Grant. For the private sector, government influence is primarily through waste legislation and impact on economic growth must be considered.

3. Issues

- 3.1 The WG Municipal Waste Sector Plan Collections Blueprint issued in 2011 sets out recommended service profile for the collection of waste from households. However, many local authorities had already started recycling service provision many years before in order to comply with requirements to divert waste from landfill under the Landfill Allowances Scheme (Wales) Regulations 2004. This has resulted in each local authority delivering services in different ways. WG offers all local authorities the opportunity to participate in a Collaborative Change Programme on the delivery of services. This programme aims to ensure that Wales meets the high recycling targets set out in Towards Zero Waste and follows the Collections Blueprint delivery model.
- 3.2 The costs of changing the type of recycling waste collection service can be considerable taking into account the provision of bins and boxes, together with the specialised collection vehicles. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it takes considerable time to implement changes across the entire local authority area. In addition, even after roll out, there will be local issues where it may not be possible to provide the same collection service for all dwellings within a local authority such as densely populated areas (i.e. flats) and sparsely populated areas (i.e. rural areas).
- 3.3 Recent changes to the regulatory framework in respect to Material Facilities (MFs) coming into force on 1st October 2014, and provisions with respect to separate collection of materials for recycling coming into force on 1st January 2015, are pertinent to the issues subject to this inquiry. The effect of these regulations will be to increase the transparency of the reject rates and the quality of materials produced by all MFs, together with the quality of the materials supplied by each supplier. This will enable local authorities to better target their advice to householders to improve the quality of the materials they deliver to MFs for sorting, and to choose the MFs that they use, with evidence regarding the efficiency of their sorting practices. However, it is our view that it is too soon to provide analysis of how this will change practices given that the regulatory developments have not yet been implemented.
- 3.4 Historical service provision data is available from WasteDataFlow. From 2005-2012, a small set of data was collected relating to types of service provision provided by local authorities for dry, residual and compostable waste. However the structure of this data was not well designed, leading to ambiguity in the data provided. The method of collection was also inflexible, meaning authorities could not describe cross-authority variations in service provision. In 2012, we

redeveloped this dataset to improve and expand it. At present, reporting of this dataset has been made optional for local authorities, owing to the extra resource required by them to report to the statutory recovery targets from 2012-13 onwards. We will begin validation of this data for the 2014-15 reporting year. However, it is not possible to fully measure local authority service provision against the WG collections blueprint using this dataset alone.

- 3.5 As the monitoring authority for both the Landfill Allowances Scheme and the Local Authority Recovery Targets in Wales, we have access to performance data provided by the local authorities through the WasteDataFlow reporting system. Whilst the tonnages and percentages are easily accessible, information on collection methods used by local authorities and relating this to recycling performance is not readily available through WasteDataFlow alone. However, we are aware that Waste Resources Action Programme (WRAP) performs further analysis of WasteDataFlow data and collects additional service provision data. This information is made available to local authorities for benchmarking and to the public. It includes more detailed service provision data, and also includes yields by material. This dataset is available for at least the last 3 years via the WRAP portal (<http://laportal.wrap.org.uk/>).
- 3.6 Local authorities report the input/output from each MF facility that they send waste to in WasteDataFlow. Using this data, it is possible to calculate a reject rate for each local authority's waste flow through each MF. During 2012-13, we carried out a scoping exercise to understand the types of information local authorities were receiving in regard to reported reject rates at MFs. We will continue this exercise in future years to monitor improvements in data reported to local authorities from MFs. The forthcoming regulatory framework changes in respect to MFs will assist us to enhance our validation of local authority reported MF reject rates for the Local Authority Recovery Targets in due course.

4. Challenges for the Future

- 4.1 The statutory Local Authority Recovery Targets increase up to 70% in 2024-25. If local authorities are to achieve the more challenging targets set in Towards Zero Waste, they must sustain the momentum of increasing preparation for re-use, recycling and composting. This sustained increase will be difficult for local authorities because many have already made most of the necessary physical changes by providing recycling facilities and offering enhanced waste management services. Smaller incremental changes are still possible, but most of the more significant changes are already in place. Evidence available suggests that increasing food waste participation is one such area that has significant potential for improving household recycling rates and therefore should be focused on.
- 4.2 Persuading more people to take part in recycling is a priority. Public participation in recycling is voluntary, with few incentives and fewer penalties. The challenge for the Welsh Government in partnership with local authorities is considerable, to increase understanding, confront perceptions and change the behaviour of householders. For example, there is still confusion on what types of materials are recyclable such as plastics. A householder requires clear, simple and consistent advice to remain engaged and understand the importance of participation. Moreover, this challenge comes at a time of mounting economic pressures for all.
- 4.3 Whilst increasing recycling rates is important, it is essential that mechanisms and drivers are put in place to encourage prevention and re-use of waste as recognised by the WG waste prevention programme. Manufacturers have a role in assisting householders to prevent waste through

designing out waste in products as well as ensuring their products and packaging can be re-used or widely recycled by householders at the end of their use. Local authorities and other public sector organisations, including Natural Resources Wales, must ensure that they take steps to influence sustainable procurement so that it optimises low waste. Wales must create a circular economy that moves away from the current linear model, where materials are fed in to the economy at the start and discarded at the end.

- 4.4 Care must be taken to ensure that the drive to achieve the Local Authority Recovery Targets does not lead to perverse environmental and economic outcomes. For example, such issues could result, in part, from the lack of suitable alternative treatment facilities both within Wales and further afield. This could be exacerbated by the pace of high recycling targets not matching provision of waste facilities and by the shortage of adequate guidance for local authorities to understand the legitimate options open to them. Whilst we strongly support the principles of waste recovery and the clear benefits to the economy and environment of Wales from the appropriate recycling of wastes as a resource, this can only be in the context of wastes being managed appropriately, with necessary environmental safeguards.

We welcome the opportunity to provide oral evidence if invited to do so by the Environment and Sustainability Committee.

[For more information](#)

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Annex 1 – Local Authority Recovery Target performance 2012-13

Authority	(a) Total MSW (t)	(b) Total LART Reuse, Recycling, Composting (t)	(c) LART Reuse, Recycling, Composting Rate (%)	LART Target (t)	(d) Percent difference to target (%)	(e) Tonnage difference to target
Blaenau Gwent	32,911	16,853	51.2%	17,114	-1.5%	-260
Bridgend	63,536	36,284	57.1%	33,039	9.8%	3,245
Caerphilly	98,431	56,172	57.1%	51,184	9.7%	4,988
Cardiff	174,103	90,950	52.2%	90,533	0.5%	416
Carmarthenshire	71,188	38,280	53.8%	37,018	3.4%	1,262
Ceredigion	34,584	18,532	53.6%	17,984	3.0%	548
Conwy	66,812	37,712	56.4%	34,742	8.5%	2,970
Denbighshire	43,543	25,262	58.0%	22,643	11.6%	2,620
Flintshire	88,133	48,401	54.9%	45,829	5.6%	2,572
Gwynedd	76,976	39,412	51.2%	40,027	-1.5%	-616
Isle of Anglesey	41,942	23,162	55.2%	21,810	6.2%	1,352
Merthyr Tydfil	29,518	14,504	49.1%	15,349	-5.5%	-845
Monmouthshire	46,007	25,545	55.5%	23,924	6.8%	1,621
Neath Port Talbot	71,695	34,652	48.3%	37,282	-7.1%	-2,629
Newport City	65,802	32,362	49.2%	34,217	-5.4%	-1,855
Pembrokeshire	64,516	34,283	53.1%	33,549	2.2%	735
Powys	78,683	40,088	50.9%	40,915	-2.0%	-827
Rhondda Cynon Taf	114,325	52,822	46.2%	59,449	-11.1%	-6,627
Swansea	111,437	53,343	47.9%	57,947	-7.9%	-4,604
Torfaen	43,749	20,616	47.1%	22,749	-9.4%	-2,133
Vale of Glamorgan	59,780	32,568	54.5%	31,086	4.8%	1,482
Wrexham	75,840	40,063	52.8%	39,437	1.6%	626
Wales	1,553,512	811,866	52.3%	807,826	0.5%	4,040

- (a) the total amount of municipal waste arising for each local authority;
- (b) the total amount of municipal waste validated by the monitoring authority that has been recycled, prepared for re-use and composted;
- (c) the recycling, preparation for re-use and composting rates for each local authority;
- (d) the difference between the target amount for recycling, preparation for re-use and composting rates and the actual rate achieved by each local authority; and
- (e) the difference between the target amount for recycling, preparation for re-use and composting rates and the actual rate achieved by all the local authorities, taken as a whole.



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National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales



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National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales

Annex 2 - Amount of BMW landfilled compared to landfill allowance for Local Authorities in Wales 2012/13

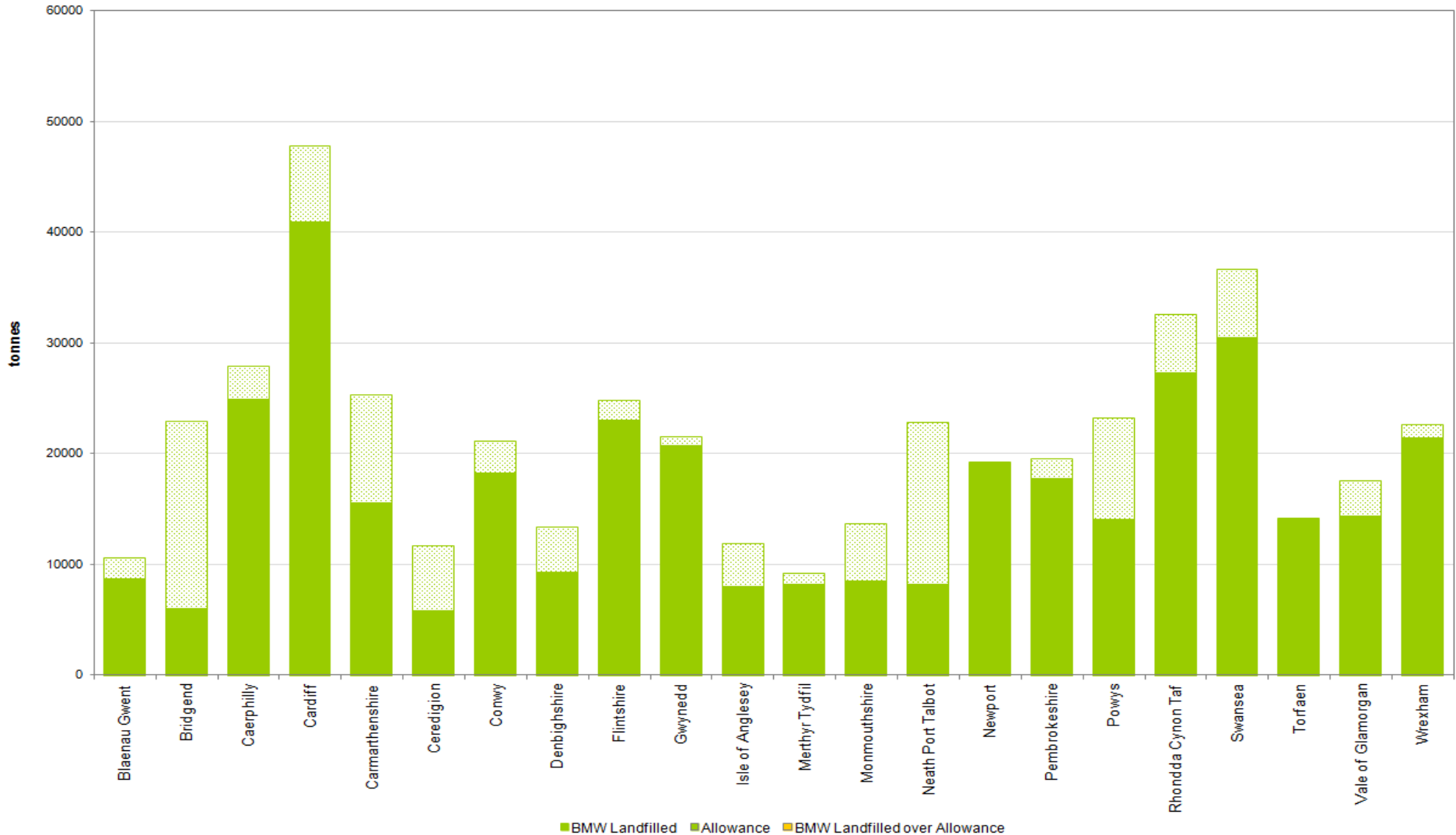
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National Assembly for Wales

Environment and Sustainability

Inquiry into recycling in Wales

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Agenda Item 5

Environment and Sustainability Committee

Meeting Venue: **Committee Room 3 – Senedd**

Meeting date: **Wednesday, 11 June 2014**

Meeting time: **09.30 – 11.30**

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



This meeting can be viewed on Senedd TV at:

http://www.senedd.tv/archiveplayer.jsf?v=en_400000_11_06_2014&t=0&l=en

Concise Minutes:

Assembly Members:

Alun Ffred Jones AM (Chair)
Mick Antoniw AM
Russell George AM
Llyr Gruffydd AM
Julie James AM
Julie Morgan AM
William Powell AM
Antoinette Sandbach AM

Witnesses:

James Byrne, Wildlife Trusts Wales
Jessica McQuade, WWF Cymru
Lila Haines, Oxfam Cymru
Gareth Clubb, Friends of the Earth Cymru
Peter Davies, Climate Change Commission for Wales
Lorraine Whitmarsh, Cardiff University
Dr Sharon Hopkins, Cardiff and Vale University Health Board
Clare Sain-ley-Berry, Wales Council for Voluntary Action

Committee Staff:

Alun Davidson (Clerk)
Adam Vaughan (Deputy Clerk)
Chloe Corbyn (Researcher)

TRANSCRIPT

View the [meeting transcript](#).

1 Introductions, apologies and substitutions

1.1 Apologies were received from Gwyn Price and Joyce Watson. There were no substitutions.

2 Climate Change – Round Table Discussion

2.1 Witnesses responded to questions from Members of the Committee.

2.2 Jessica McQuade agreed to provide the Committee with further information on the example referred to regarding how the Welsh Government is working with Local Authorities and housing associations to acquire Green Deal funding.

3 Climate Change – Round Table Discussion

3.1 Witnesses responded to questions from Members of the Committee.

4 Papers to note

4.1 The committee noted the minutes.

Natural Resources Wales – Further information following 7 May meeting

4.2 The Committee noted the paper

Marine policy in Wales – Response from the Minister for Natural Resources and Food to follow up letter May 2014

4.3 The Committee noted the letter.

Agenda Item 5.1

Additional Information for National Assembly for Wales Roundtable Discussion on Biodiversity - 21 May 2014

Biodiversity baselines on Natural Resources Wales' estate and on protected sites

Following the National Assembly for Wales Biodiversity Round Table on Biodiversity, Natural Resources Wales offered to provide further information on biodiversity baseline on its estate and on designated sites. This paper fulfils this offer.

Two components of the above will benefit from further definition:

Baseline: A baseline is something against which it is possible to make an assessment of change and this has some methodological implications, in that methods have to be precise enough so that real change is not obscured by measurement error. For this reason, many surveys, unless designed to be precisely repeatable, do not provide baselines that are as good as monitoring programmes. Monitoring programmes are designed with repeatability in mind. Surveys can however be enormously valuable in developing such monitoring.

Natural Resources Wales' estate: This paper includes information for both the land that Natural Resources Wales owns e.g. some National Nature Reserves (NNRs) or much of the Welsh side of the Dee Estuary, and the land that we manage on behalf of others e.g. the Welsh Government Woodland Estate. It also provides information on available the baseline for other designated sites that are owned and managed by third parties.

Land that Natural Resources Wales owns

NNRs, whether owned by Natural Resources Wales or third parties, are, like any other areas of Wales, covered by several Wales-wide surveys, including:

- Phase 1 survey, published as the *Habitats of Wales* (1979 to 1997), which is a Wales-wide field-based habitat survey that mapped all land cover in Wales.
- Remote sensing - habitat information captured from remotely-sensed satellite imagery across Wales. This is still under development.
- Woodland on NNRs (and elsewhere) will be covered to some extent by the National Forest Inventory (NFI), which distinguishes between broad categories such as coniferous and broadleaved woodland.
- More detailed Phase 2 vegetation survey, using the National Vegetation Classification (NVC), for some key habitats such as lowland grassland, peatlands, heathlands and some uplands has been carried out on our estate and other targeted areas, based on the priority of those areas for that habitat.

60 of the 76 NNRs are wholly or partly nested within Natura 2000 sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)), whose habitats and species features are subject to an ongoing programme of condition monitoring (see below). It may not, however, always be possible to disaggregate results from the SAC monitoring programme such that robust data can be derived specifically for NNRs.

Monitoring is carried out on NNRs in addition to the SAC monitoring. The focus of the NNR monitoring programmes is on the non SAC features of each reserve.

Land/water owned by third parties and managed directly by Natural Resources Wales

Evidence is available from the NFI and its predecessor survey NIWT (the National Inventory of Woodland and Trees) as well as from monitoring designed to support forest operations. The NFI records (amongst other things) the amount of woodland, broadleaved and coniferous, on a five year cycle and includes biodiversity information such as National Vegetation Classification communities in the field layer. Natural Resources Wales is currently working with Forestry Commission to develop a methodology to assess forest condition for biodiversity from the data collected. As the current cycle is in its final year, we will be able to assess the condition for the last 5-year period.

An updated Ancient Woodland Inventory has recently been published. This includes a digital map of all woodlands in Wales considered to be ancient, based on their presence on the earliest OS maps. This distinguishes between sites retaining semi-natural composition, and those replanted with conifers. Natural Resources Wales has completed an Ancient Woodlands Baseline Survey (AWBS) for all of the ancient woodland resource on the WGWE (including ancient semi natural woodland (ASNW) and plantations on ancient woodland sites (PAWS)). This provides a baseline on 12 key attributes and associated factors within the woodlands structure against which we can monitor the progress that our management interventions are making and as such is designed to be repeatable. As a requirement by UK Woodlands Assurance Standard (UKWAS), the AWBS also provides an assessment for critical and threatened sites and allows prioritisation for targeted management.

A deadwood provision assessment for the whole of the WGWE (126,000ha) has been completed, enabling managers to incorporate deadwood interventions into coupe plans. Monitoring change in deadwood provision may be a part of annual auditing requirement for the UKWAS.

A baseline for riverine woodland is available for all forests in the South Wales forest districts; this records condition and issues such as invasive non-native species. This survey informs management requirements and the methodology is designed to be repeatable so that the impact on biodiversity of any intervention can be monitored. Both the riverine and AWBS are spatially captured within GIS which aids future evaluation and assessment of progress.

We hold a database of species present on the WGWE. While not a definitive record of the estate - it is not carried out systematically, rather where operations are planned and where projects or the public report records - there is a large amount of data available. Specific projects have been carrying out recording for long periods; examples are dormouse recording in Bontuchel and the work with Butterfly Conservation Wales which has identified woodland sites across Wales important for Lepidoptera priority species, and has planned and completed conservation work for them. The partnership with Butterfly Conservation carries out annual monitoring and has been operating for over 10 years.

Land owned by third parties where we work in partnership, share land management objectives or influence management through designation

The protected sites series includes areas designated under European legislation – SAC and SPA (from the Habitats and Birds Directives respectively) and UK legislation (Special Sites of Scientific Interest (SSSI)). In most cases, European designations are underpinned by SSSI designation (though not in the marine environment), and the designations themselves can overlap. Consequently, a single area of land can be designated as SSSI, SAC and SPA. Different ‘features of

interest' are associated with each designation type (and can relate in either simple or complex ways). It is these features that are the focus of monitoring.

For **SACs**, there is an ongoing, comprehensive programme of monitoring, undertaken by, or commissioned by, Natural Resources Wales staff. At any particular site, only those habitats and species for which a site was designated are monitored. Monitoring takes place on a 6-year cycle, with each listed habitat or species feature monitored at least once in each 6-year period. The first more-or-less complete set of assessments covers the period 2001-2006, with a repeat set completed (mostly) during 2007-2012.

For **SPAs**, Natural Resources Wales has worked with RSPB to collate and regularly update data on counts of listed bird species. This draws heavily on a range of surveys and monitoring programmes undertaken by partner organisations, often involving collection of data through citizen science schemes, such as the Wetland Bird Survey (WeBS) coordinated by the British Trust for Ornithology (BTO). This approach is vulnerable to gaps in data arising if underlying surveys cease or take place on a less frequent basis.

Data from SAC and SPA monitoring have been used to compile an indicator of protected site condition, published (until 2012) in Welsh Government's State of the Environment report; and these same data are also supplied for background use in the equivalent UK indicator (published annually in the UK Biodiversity Indicators in Your Pocket report).

For **SSSIs**, there is no comprehensive programme of monitoring across all feature types. Some are monitored regularly (e.g. geological features, intertidal features, some freshwater features), others more intermittently, and some probably not at all.

In addition to monitoring datasets, we also have National Vegetation Classification data for the majority of sites, collected through strategic national surveys for habitat groups such as lowland grasslands, woodlands, peatlands and heathlands; an example of this is the *Grasslands of Wales* book, published in 2010. Equivalent comprehensive surveys of intertidal habitats around Wales have been completed.

As mentioned in relation to NNRs, a varied set of broader surveys (such as Phase 1 survey) will also provide evidence relating to these protected areas, even if these do not provide strong baselines against which to measure change.

For some sites, there are detailed time series of data for a wider range of species and other environmental parameters (e.g. from the Environmental Change Network site on Snowdon and the Skomer Marine Nature Reserve).

For other priority habitats and species (i.e. where not identified as features of interest), available information is variable and patchy, with the scope for identifying trends often very limited. Generally, this is true for both 'our estate' and for the wider countryside. Examples of available data include the Botanical Society of Britain and Ireland (BSBI) vascular plant atlas and the annual monitoring carried out by Butterfly Conservation which will include transects on the Natural Resources Wales estate

General point for biodiversity information for any site or location

Natural Resources Wales also has access to third party species and habitats records occurring on our estate through our partnership work with Local Records Centres (LRCs), the National Biodiversity Network (NBN), Marine Environmental Data and Information Network (MEDIN) and national schemes and societies. Through our

partnership support for LRCs we receive bespoke GIS layers of priority and protected species locations and LRCs can provide a report of all records for any location. The NBN gateway has a map of the boundaries for designated sites and can provide an automated report of species records for that site. The main challenge that we face is creating a single view that effectively pulls these records together into one place. We work with national schemes and societies to develop targeted monitoring schemes to help gather records suitable for status and trend reporting and with the Centre for Ecology and Hydrology to investigate modelling techniques that enhance the use of ad hoc and citizen science data for robust monitoring.

Authors

David Allen: Team Leader Environmental Monitoring & Surveillance Team

Chris Tucker: Biodiversity and Heritage Officer

Julia Korn: Ecosystem and Biodiversity Advisor

Natural Resources Wales

Date: 4 June 2014

Additional Information for National Assembly for Wales Roundtable Discussion on Biodiversity - 21 May 2014

Information on progress with the development of the Information Hub

Welsh Government (WG) arranged two early meetings with Natural Resources Wales (NRW) on the scope of the Information Hub. Since then a draft proposal was presented to the WG Natural Resources Policy Board and WG staff have been consulting with policy branches within government to scope their requirements .

The focus so far has been working with the WG GIS teams on creating the right infrastructure and underlying architecture, with relevant data content or links to relevant data. Stakeholders have a number of different requirements and expectations of 'a hub'. Providing the initial infrastructure with content is seen as a useful and practical deliverable for the first phase. This can then be used to scope requirements for 'views' on the content.

WG met recently with NRW staff to update. It is proposed that WG use their Lle site as the first phase of developing the hub.

Lle is the WG publishing mechanism, currently set up for spatial datasets

(<http://lle.wales.gov.uk/>)

It also intended to publish the map views through Google's new public maps gallery

<https://maps.google.com/gallery/>

Example search for maps in Wales

<https://maps.google.com/gallery/search?hl=en&q=wales>

Example search for WG maps

<https://maps.google.com/gallery/search?hl=en&q=welsh+government>

WG also aim to create a landing page that point users to this content ready for the July Royal Welsh.

NRW is working with WG to co-ordinate the submission of NRW open data sets for publishing through the WG portal. The timetable is tight but we will publish as many open datasets as we can. In the short term we will need to maintain manual uploads to the WG portal as an overhead, but we will be looking at automating this in the medium/long term. We are assessing the frequency of update as part of our publishing plans in order to understand the administration overhead.

NRW is also working with WG on drafting a MoU/MoA to document the data exchange and service commitments of the partnership.

Author

Helen Wilkinson: Information Mapping and Analysis Team Leader
Natural Resources Wales

Date

6 June 2014

Y Pwyllgor Amgylchedd a Chynaliadwyedd

Environment and Sustainability Committee



Emyr Roberts
Chief Executive
Natural Resources Wales

3 June 2014

Annwyl Emyr

Natural Resources Wales 7 May evidence session – further information

The Committee would like to thank you and Professor Peter Matthews for attending our meeting on 7 May to discuss the progress made by Natural Resources Wales during the first year of its operation. During the session a number of issues were raised which we would be grateful for further information on. Thank you for the information already provided in relation to flood forecasting and the Wales Coastal Path – this has been circulated to members of the Committee.

We would be grateful if you could provide an update as to when you expect the staffing structure to be completed, including progress on incorporating the Internal Drainage Boards, particularly arrangements for cross-border operations and ensuring the continuing engagement of local landowners.

Further to the questions raised by Antoinette Sandbach and Julie Morgan, we would appreciate clarification on the mechanisms in place for providing advice to the Welsh Government. It would be helpful to receive details as to how advice from expert officers is provided to Welsh Ministers and clarification as to how such advice is pursued/followed-up e.g. in relation to the advice provided on proposals for the M4 around Newport.

It would also be useful to receive clarification on plans to reduce Natural Resources Wales' workforce to 1,850. During the session you stated that reducing to this number would create skills gaps and that a re-balancing of skills within the organisation would be required – please could you explain what this would entail and how you propose to achieve this. We would be grateful if, in your response, you could refer to how these plans take account of possible resource requirements expected from the Environment Bill and also the criteria being used to decide which staff are accepted for voluntary severance.

We would be grateful if you could provide further detail on the de-coupling of the IT systems, and confirmation as to whether you have a final indication of the associated costs and timetables.

Again, you will recall that Members raised the need for independent verification of the separation of functions, particularly given the proposals for developing more enterprise activities. I understand that this information is being collected and will be provided to us shortly.

We would also be grateful if you could provide an update in relation to action you have taken to improve your response time to planning consultations and by when you expect to see the improvement.

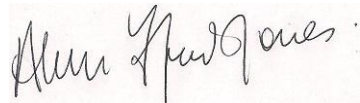
In relation to issues around quantifying non-cash benefits associated to the Business Case for the creation of the Single Environment Body, we would be grateful if you could provide details of how non-cash benefits were calculated in the last financial year and how you intend to calculate and present non-cash benefits for the current and future financial years.

Finally, we would be grateful for clarification on the £3 million of savings, the money carried forward and whether this relates to projects that were delayed and will need to be funded this year or whether it relates to savings you were required to find to fund pressures this year. The finance paper presented to NRW Board

meeting on 3 April suggests that it was the result of savings and not underspend, however, we would be grateful if you could confirm this.

We look forward to receiving your response to these queries.

Yn gywir,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Alun Ffred Jones".

Alun Ffred Jones AM

Chair of the Environment and Sustainability Committee



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19 June 2014

Annwyl Alun,

Natural Resources Wales 7 May evidence session – request for further information

Thank you for your letter of 3 June in which you asked for further information on a number of issues that were raised in the Committee meeting of 7 May.

My letter provides an update on each of the subjects that you have asked for more information on.

1. Expected date for completion of staffing structure

- Our Executive Team and Leadership Team structures are already in place and we will shortly have completed the appointment of our Management Tier. Work is also underway to develop the remaining staff structures in a way that will deliver our business objectives and these are being considered in line with our organisational

design principles i.e. placed-based teams working in communities, doing things once for Wales etc. It is important to remember that structures are continuously evolving and will need to adapt and flex to meet our continuously changing business priorities.

- However, structures are only one part of the answer and we are also considering our ways of working to complement structural arrangements. Working with managers and trade union colleagues, there are multiple change programmes happening across the next 3/6 months. Some are a complete re-design of work roles and require due process to be fair with staff; others are simple realignment of staff and teams to new managers.
- It is therefore difficult to be absolutely categorical about the 'completion' of our staffing structure, but I would expect to complete the appointments to our Management Tier by the end of July, and to have largely completed other structures by the end of September 2014.

2. Progress on incorporating the Internal Drainage Boards (IDBs), arrangements for cross-border operations and continuing engagement of local landowners

- Natural Resources Wales has established close and productive working relations with the staff of the three IDBs to jointly discuss and develop arrangements for the transfer of staff, assets and functions.
- Regarding future cross-border arrangements, we are currently working in partnership with Powysland and Lower Wye IDBs, the Environment Agency, Welsh Government and Defra. We are making sure arrangements are in place for 1 April 2015 for the co-ordinated delivery of operational work both in Wales and also on the English side of the border. This will build upon the existing approaches of NRW, the EA and the IDBs to cross-border water management.
- New governance and stakeholder engagement arrangements are required from 1 April 2015. Natural Resources Wales is therefore also liaising with the current Chairs of the three IDBs and IDB staff to develop bespoke arrangements that reflect the individual issues and customer priorities for each of the Internal Drainage Districts that NRW will administer from next April.

3. Clarification on the mechanisms in place for providing advice to Welsh Government

- The protocol for advising Welsh Government is the same, irrespective of the topic area i.e. planning or any other. Advice to the Minister mainly comes from Welsh Government civil servants and we advise them; either by direct input to policy development at the request of officials, discussions through reference group/programme boards, policy forum etc. or by providing information to facilitate their responses to AOs.

- Advice directly to the Minister is normally requested through our regular meetings with the Minister, and submitted via me.

4. How advice from expert officers is provided to Welsh Ministers. Clarification as to how such advice is followed up and specifically, how advice was provided on proposals for the M4 around Newport

- NRW provides advice to Welsh Government on planning development through our role as a statutory consultee.
- With respect to NRW's engagement with Welsh Ministers and Welsh Government on the draft Plan for the M4 Corridor around Newport, we responded in December 2013 providing our expert advice on the draft Plan and its accompanying Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). These responses were to ARUP, who were managing the consultation on behalf of Welsh Government.
- Welsh Government has held a number of Environmental Liaison Group meetings since July 2013, which Natural Resources Wales has attended, providing technical advice as appropriate. In addition we have had a number of meetings with ARUP, who are working on behalf of Welsh Government to provide specific technical advice in the fields of ecology and nature conservation, flood risk and planning. This advice has been provided 'without prejudice' to any decision by Welsh Government to take forward the draft plan.
- As with all NRW responses to external customers, we consult widely internally for specialist input and distil this to provide a 'single voice' response.
- Alongside advice provided in meetings, we have also provided specific written advice in relation to consultation on survey requirements and methodologies for a number of ecological surveys, again on a 'without prejudice' basis. All of our responses require sign-off from a senior manager.
- Our involvement on the M4 proposals has therefore been with Welsh Government officials and their principal consultant (Arup) rather than Welsh Ministers.

5. Clarification on plans to reduce our workforce to 1,850

- We are committed to reducing our workforce headcount to 1,850, which is in line with the original business case. However, it should be recognised that the original 1,850 figure did not take account of some of the additional functions and staff who have transferred to NRW for example, the Llanelli Laboratory.

6. Resulting skills gaps and re-balancing of skills to manage this

- We undertook a skills audit in our first year of operation that identified where our talent and experience was, and to enable us to plan both learning and development and recruitment strategies. We identified skills gaps particularly in relation to some of the expert services that were previously provided by staff either in the Environment Agency or Forestry Commission GB. We are continuing to work with the business areas to understand the requirement and develop routes to maintain our knowledge in-house. In parallel, we are investigating opportunities for entry level schemes and apprenticeships for NRW and we are developing links with academic institutions and providers to mitigate these current gaps.
- There have been a number of exits from NRW through our first voluntary exit scheme (2013 / 14). The criteria applied prioritised exits for our Corporate Services. Following the development of our Corporate and Business Plans (which include a high level workforce plan for NRW), we now have workforce plans for all areas of the business and these plans will drive our recruitment and learning and development investment.

7. How these plans take account of possible resource requirements expected from the Environment Bill

- Changes in the profile of our workforce will be driven by multiple factors including changes to Welsh Government policy and new requirements placed on us. This means we need to support continuing professional development for all staff and ensure our core purpose is well understood. We have for example been running well-attended workshops on the eco-system approach.
- We have been working with Welsh Government to understand the resource requirements for NRW from the proposed Environment (Wales) Bill. We are also working with Welsh Government to establish where our work on existing environmental plans could be stopped, streamlined or subsumed within the new area based approach to integrated natural resources management. We have identified a short term need for resources as we invest in the transition to new ways of working and a more integrated approach; we have secured money from the Nature Fund to support this transition work.

8. Criteria being used to decide which staff are accepted for our voluntary exit scheme

- Our voluntary exit scheme is an important mechanism in achieving our head count figure of 1,850. Any staff exits under this scheme will be subject to scoring criteria, which will include an assessment of the impact of the loss of skills and experience and succession planning. Our detailed workforce plans will drive the process for our next round of voluntary exits. No staff will be released where the skills and

experience are considered business critical and cannot be provided in a different way.

9. Further detail on the decoupling of IT systems and confirmation of final indication of the associated costs and timetables

- The decoupling of ICT systems is proceeding on schedule and within forecasted budgets. Currently 800 NRW staff are on the new NRW kit and systems, and all NRW staff will be migrated onto NRW kit by the end of the calendar year. Work will then continue to remove the dependency on most of the ICT services provided by the partner organisations during 2015/16, with a small amount of residual services remaining where it is mutually beneficial. The total cost for decoupling work in 2013/14 was £ 9.7m and the forecast cost for 2014/15 is £14.2m.
- The benefits associated with the de-coupling also remain on track.

10. Need for independent verification of the separation of functions, particularly given the proposals for developing more enterprise activities

- I include with this letter a document that sets out our operational response, using organisational design and other tools, to help us deliver our multiple roles transparently and equitably. These arrangements are subject to ongoing review by our Board, including its Audit & Risk Assurance Committee, to ensure they remain fit for purpose

11. Actions taken to improve response time to planning consultations, when we expect to see improvements

- We have been working with an aggregation of legacy processes to provide a single voice and manage our ongoing workload; and our staff have risen to the significant challenge of bringing the three legacy organisation advice services together. We have also seen, and successfully accommodated, a significant increase in Nationally Significant Infrastructure Project (NSIP) workload; a significant number of Local Development Plan consultations; and a number of other high-profile planning cases.
- We have been developing the operating model for the Planning Service in NRW. For example, we have established a national governance model in relation to the provision and delivery of advice to the planning system. The Development Planning Advice Delivery Board is now providing the “Head of Business” for NRW’s national planning service providing process ownership, prioritising improvement and consistency, managing transition and providing steer and governance needed.
- We have also developed strategic objectives for our planning advice. This is key to ensuring the embedding of a positive approach and the proactive engagement with

the planning system as an important means of delivering sustainable development, natural resource management and positive outcomes for Wales' natural heritage. This has also enabled alignment of our future approach to external changes proposed for example, those set out in Positive Planning.

- We have recruited staff and filled vacant posts and have brought in additional technical expertise to support areas where there is a high call on technical specialists e.g. landscape. Our Operations South Directorate has just re-aligned and integrated its planning case management resource into two teams (from 9), one covering SE and one covering SW; our North and Mid Wales Directorate will also be re-aligning.
- We have undertaken detailed process analysis and developed solutions. The current complex aggregation of legacy processes has been analysed and key areas of improvement have been identified, solutions for process improvements worked up, and improved ways of working have been agreed.
- We have set ourselves targets for improved response times and I am confident that there will be a noticeable improvement within the next six months.

12. How non-cash benefits were calculated in the last financial year / how we intend to calculate and present non-cash benefits for the current and future financial years

- The non-cash realisable benefit is mainly the value of staff time that we free up by improving productivity and reducing wasteful effort. We are creating these efficiencies with business improvement projects that simplify processes and make them more customer focused. These projects will start delivering improvements during 2014/15 and onwards. For example, work to streamline the collection of water samples will make that process 20% more efficient and in time free up staff time equivalent to seven full time posts. That will increase our capacity for other priority work. On the same basis, early changes in 2013/14 freed up staff time worth about £0.5M per year.
- We are managing all the actual and planned benefits through the use of a benefits register, and are tracking delivery of non-cash realisable benefits through a benefits scorecard and ultimately our corporate dashboard.

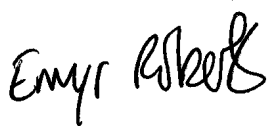
13. Clarification on the £3 million of savings

- The £3m savings were targeted budget reductions and savings and not underspends. This action was taken to meet budgetary pressures in our Forest Roads Civil Engineering programme and costs related to transitioning away from the Environment Agency's ICT infrastructure and applications. As part of that

exercise, we were also targeting a budgetary surplus at the end of year to help meet financial pressures in 2014-15.

I hope that this provides you with the further information that you were seeking. Should you require any further clarification on these, or any other issues, please do not hesitate to contact me.

Yn gywir,

A handwritten signature in black ink, appearing to read 'Emyr Roberts', written in a cursive style.

Emyr Roberts

**Prif Weithredwr
Chief Executive**



Delivering our Multiple Roles as a Land Manager, Statutory Adviser and Regulator (Version 1) –

*Integrated decision making supported
by transparency and accountability*

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1. Introduction and Purpose

It was a deliberate and strategic decision by the Welsh Government to establish Natural Resources Wales (NRW) with multiple land management, advisory and regulatory roles. This decision reflected an aspiration to create a new and innovative approach to deliver integrated natural resource management, whereby a single organisation has at its disposal a range of tools and roles to better achieve positive outcomes for people, the environment and the economy.

This document establishes the context for our multiple roles, as well as acknowledging the challenges that these roles give us in two main areas. First, with regard to transparency of our own responsibilities as an organisation that directly delivers services, especially as a land manager - an 'operator' - in our own right. And second, in respect of our statutory responsibilities, where legislation and case law means that we are required to organise our delivery with particular requirements in mind.

The purpose of the document is to establish clarity and transparency for external stakeholders and customers. We describe our organisational design and operational responses established to achieve these objectives. They are all designed to support the decision to establish a new approach towards the delivery and facilitation of integrated natural resource management, through the creation of Natural Resources Wales.

2. Our Purpose and Roles as an organisation

The Establishment Order states the purpose of Natural Resources Wales is to ensure that the environment and natural resources of Wales are:

- (a) sustainably maintained;
- (b) sustainably enhanced; and
- (c) sustainably used.

(2) In this article –

(a) “sustainably” (“yn gynaliadwy”) means –

(i) with a view to benefitting, and

(ii) in a manner designed to benefit, the people, environment and economy of Wales in the present and in the future;

(b) “environment” (“amgylchedd”) includes, without limitation, living organisms and ecosystems.

Our purpose requires a balance to be struck and does not ascribe weight to any aspect (e.g. the environment or the economy) in preference to another. However, we have a duty to implement existing legislation and whilst it informs our approach, we must also have due regard to our purpose and use discretion and judgement in the application of specific legal requirements.

The ‘Functions Order’ transferred many duties and functions from the existing legislation and our roles can be summarised as follows:

Regulator: protecting people and the environment including marine, forest and waste industries, and prosecuting those who breach the regulations that we are responsible for

Statutory Adviser: to some 9,000 planning applications a year and also in respect of Strategic Environmental Assessment, Habitats Regulation Assessments and Environmental Impact Assessment.

Land Manager (Operator): managing seven per cent of Wales' land area including woodlands, National Nature Reserves, water and flood defences, and operating our visitor centres, recreation facilities, hatcheries and a laboratory

Technical/Policy Adviser: principal adviser to Welsh Government, and adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources

Designator: for Sites of Special Scientific Interest – areas of particular value for their wildlife or geology, Areas of Outstanding Natural Beauty (AONBs), and National Parks, as well as declaring National Nature Reserves

Responder: to some 9,000 reported environmental incidents a year as a Category 1 emergency responder

Partner, Educator and Enabler: key collaborator with the public, private and voluntary sectors, providing grant aid, and helping a wide range of people use the environment as a learning resource; acting as a catalyst for others' work

Evidence gatherer: monitoring our environment, commissioning and undertaking research, developing our knowledge, and being a public records body

Employer: of almost 1,900 staff, as well as supporting other employment through contract work.

For many of the activities we are involved in we may exercise more than one role, either simultaneously or sequentially. For instance, we may provide a local authority with advice as a statutory adviser in respect of a proposed development and then be required to consider an application for a permit under a regulatory regime for the same development.

For a range of our own land management activities and those undertaken by our contractors, we are also the regulator – the body responsible for granting permits, assessing compliance, investigating potential offences and taking enforcement action. We also act as the consultation body for our own programmes, plans and projects in respect of environmental assessments such as Strategic Environmental Assessment (SEA), Habitat Regulations Assessment (HRA) and Environmental Impact Assessment (EIA). In this operator mode we also consider / facilitate third party activity on which we may then provide statutory advice to other authorities and then be required to consider applications for permits against regulatory regimes where we have responsibility.

Our Board has established high level principles to help us manage and organise these roles to achieve an agreed corporate position and avoid undue criticism. In addition our founding legislation and our legal purpose provides an overarching principle that is vital in managing our multiple roles. Namely, that no one role has primacy or priority over another. It is our responsibility to use evidence and judgement to agree the most optimal course of action recognising all our roles and our overarching purpose.

This means that our strategy decisions are key and once they have been made, all our roles can be delivered in line with our wider legislative responsibilities.

3. The principles we have adopted for managing our multiple roles

In developing its approach to corporate governance and mindful of the organisation's purpose and strategic case for a new approach to integrated natural resource management, our Board agreed to adopt a number of governance principles that aim to guide our operational responses to the management of our multiple roles:

- a. All proposals will facilitate integrated decision making by NRW in support of the ecosystem approach
- b. Functional separation will only be used when necessary, in recognition that NRW is one organisation and that regulatory and advisory functions support the same outcomes;
- c. Transparency will be a fundamental requirement both internally and externally;
- d. Delegated authorities will be based on risk thresholds.

4. Our Operational Response when Land Manager, Statutory Adviser and/or Regulator

The organisational structure for Natural Resources Wales (Annex 3) is a key component in managing our multiple roles in line with the agreed principles:

Our **Operations Directorates** fulfil the Land Manager role through their management of the Welsh Government woodlands and our own land, as well as when acting as the 'client' for services provided by other Directorates e.g. when constructing flood defence schemes or other developments and activities on the land we manage or own. In addition our **Operations Directorates** also provide all our statutory advice to local authorities and the Welsh Government, as well as project level statutory responses to HRA and EIA, including those of the Directorate as a 'Land Manager'. The teams that fulfil our Land Manager role in Operations are separate to the teams that provide our statutory responses and report through to a different manager at Leadership Team level. Our **Operations Directorates** do not make regulatory consenting and permitting decisions, which are made by our National Services Directorate reporting to a different Executive Director. However our **Operations Directorates** do undertake compliance and enforcement work based on agreed permits and the protocol for how this is undertaken for our own operations is set out in 4.1

Our **National Services Directorate** provides internal and external services. The internal services are primarily provided to our Operations Directorate as Land Manager and 'client'. For example harvesting & marketing of timber from the woodland estate and project management of flood defence schemes. In addition, **National Services Directorate** also provides an 'enterprise development' service. Where this involves the land that we manage, the Operations Directorate acts as 'client'. All these activities report to a single Leadership Team level manager. **National Services Directorate** also provides a

Permitting and Consenting Service to third parties and to Natural Resources Wales as a Land Manager through our Operations Directorate. These activities report to a different Leadership Team level manager.

Our **Knowledge, Strategy and Planning Directorate** is responsible for strategy development on behalf of the whole organisation. These strategies consider our multiple roles and are the method by which we will achieve alignment for all our roles to achieve our purpose. **Knowledge, Strategy and Planning Directorate** also provides a plan making assessment service for Natural Resources Wales own programmes and plans that require assessment under the SEA and HRA Directives.

Due to the case law requirements for functional separation when a plan making body is also the relevant Consultation Body for Strategic Environmental Assessment, our **Governance Directorate** fulfils the Consultation Body role, as the Directorate has no plan making, land manager or regulatory responsibilities. Due to the close process links with Habitat Regulations Assessments, the **Governance Directorate** also acts as the Consultation Body for these requirements at 'Plan' level.

4.1 As a Regulator of our own Land Manager role

The following explains how we will regulate our own activities including determining applications using principles of fairness, transparency, independence, and an exemplar level of environmental protection.

In some cases such as water abstraction, the legislation prescribes the process for permitting our own activities. However, most of the applicable legislation does not specifically cover self-permitting or compliance and enforcement. The Natural Resources Body for Wales (Functions) Order 2013 ("the Functions Order") imposes a duty on NRW to have a publication scheme, part of which relates to self-permitting; the scheme imposes some specific requirements.

Where we are responsible for a regulatory regime then we will apply the following standards to our application for a permit, determination of permit applications, participation in internal consultation, compliance assessment and investigation of potential offences in relation to own activities. The standards also apply to permitting, compliance and enforcement activities in relation to works conducted by contractors on behalf of NRW; for example, a licence to translocate dormice resulting from construction works within woodland.

Our standards will ensure that:

- a. We apply equivalent scrutiny and standards to our own activities as those required for external individuals and businesses. In particular, we should comply with our published enforcement policy and follow relevant public interest considerations.
- b. We follow clear and transparent decision making processes that are robust to challenge and clearly documented.

- c. There is an appropriate degree of separation between the business unit being regulated and the team undertaking the regulation. This is to help demonstrate fairness and transparency, and to support the public's and Welsh Government's confidence in our decision making.

4.1.1 Permitting

The decision making level for internal permits is as specified in the Non-Financial Scheme of Delegation (NFSoD). This will usually be the same as for external applications unless specified otherwise. Where a decision is likely to be contentious, or subject to internal or external challenge it will usually be appropriate to escalate the sign off to a higher level.

Separate guidance exists on functional separation relating to internal consultation on permit determination involving EU obligations, e.g. Habitats Regulations appropriate assessments and environmental impact assessments. These arrangements should be followed for internal permitting, where appropriate.

The arrangements in sections 4.1.3 to 4.1.5 below also apply to permitting activities in relation to works conducted by contractors on behalf of NRW.

4.1.2 Arrangements between National Services and Operations

Where an internal application is made by the Operations Directorates, and submitted to the permitting teams within the National Services Directorate for determination, then a separation of function already exists.

The team that determines the application may need to consult teams within the Operations Directorate that made the application. This may be entirely appropriate as local information will often be needed. However, if the information is critical to the decision then a degree of separation is applied through sign off rather than by local teams being organised specifically to deal with internal applications. This is normally by separation of line management to at least tier 3 (level below Leadership Team) or validation of the advice by subject experts in another directorate (KSP, NS or the other Ops Directorate).

Examples of internal permissions determined by permitting teams within National Services include:

- Water quality discharge consents for an NRW hatchery
- Marine licences for flood defence schemes
- Water abstraction licences for an NRW hatchery
- Septic tank registrations for NRW offices and depots
- Waste exemptions for NRW offices and depots
- Forest resource plans and felling licences for the Public Forest Estate

4.1.3 Arrangements where the application originates and is determined within National Services.

Any internal application is determined by a team separate from the team where the application originated, and provide a separation of function to at least Leadership Team level.

If the application is potentially contentious or likely to be subject to internal or external challenge, then as an additional safeguard the proposed decision can be referred to the Governance team for advice on an appropriate approach.

4.1.4 Arrangements where the application originates and is determined within Operations.

Where applications arise from within Operations Directorates that would normally be determined within Operations for external applicants, then a degree of separation through sign off by different area teams is in place.

Examples include:

- SSSI consents issued for NRW flood and coastal risk management schemes
- Flood defence consent for works carried out by NRW

Where possible, applications are determined according to the inter-area arrangements set out in table 1 below. Where this is not possible or the application is potentially contentious, then as an additional safeguard the proposed decision can be referred to the Governance team for review. As a minimum there is a separation to at least Leadership Team level.

Where applications are submitted by contractors on behalf of Natural Resources Wales the same arrangements described above are applied.

There may be some circumstances where it could be appropriate that some of the work can be carried out by the local team. For example, where extensive site visits are required. However, the permitting decision will be taken in accordance with the general arrangements above and clear evidence (e.g. photographs) will be provided.

Table 1- Inter-area arrangements

Area	Will regulate	Will be regulated by
North Wales	South East Wales	South West Wales
Mid Wales	South West Wales	South East Wales
South East Wales	Mid Wales	North Wales
South West Wales	North Wales	Mid Wales

Note:

Where the team permitting the activity covers all of South or all of North & Mid Operations Directorates, then the application will be determined by the Directorate other than the one where the application arises.

4.1.5 Compliance

Once permissions have been granted the inter-area arrangements described in Table 1 above will be applied for any compliance assessment work. The arrangements in this section also apply in relation to works conducted by contractors on behalf of NRW.

Where the team undertaking compliance assessment covers all of South or all of North & Mid Operations Directorates then the compliance assessment will be carried out by the Directorate other than the one where the regulated activity takes place.

There may be some circumstances where these arrangements are not practicable. In these cases, functional separation to at least Leadership Team level will be applied. If an issue develops that is likely to be contentious e.g. an offence is identified, then functional separation to at least Executive Director level will be applied for oversight or review.

4.1.6 Investigation of potential offences

In general, the arrangements described above for compliance will be applied to investigations where potential offences are identified. Offences could be breaches of permit conditions or contraventions of directly applicable legislation such as Duty of Care requirements or causing an unpermitted water discharge.

Where a potential offence relates to a pollution incident, the initial response will usually need to be provided by local officers, but follow up investigations should be in accordance with the arrangements described above.

Whenever a potential offence is identified, it will immediately be communicated through line management to Director level, in both the Directorate undertaking the activity and the Directorate undertaking the role of regulator.

4.1.7 Enforcement

Where an offence has been committed we will comply with our published enforcement policy and take account of relevant public interest considerations. Report of contravention forms will be completed for all cases and should be referred to the relevant enforcement panel and the Wales Enforcement Panel. Relevant Directors will have been informed.

Where the appropriate response is a warning and/or the issue of a notice this will be completed internally. In most cases a notice will not be necessary, because we would expect complete co-operation and prompt action. This is equitable with the approach we take with external parties.

For circumstances where a prosecution, formal caution or civil sanction is potentially appropriate, legal advice will be sought immediately*.

**We are seeking further legal advice in relation to these circumstances, and this procedure will be updated when the advice is received.*

4.1.8 Charging

Where a permit application would normally attract a fee there is no charging requirement for internal applications or subsistence fees for internal permits.

Where applications are required to be advertised in a newspaper during the determination process, then the applying department needs to cover these advertisement costs.

4.1.9 Publishing requirements for all internal permissions

The Functions Order 2013 requires that we publish information* about 'all applications for permits made by the Body, in cases where the Body is responsible for determining the application'. We are also required to inform Welsh Government of all internal applications (where it has the power to call in an application) at the time of the application.

The 'self permitting decisions' spreadsheet on the document management system is used to record the receipt and determination of internal permit applications. It is the responsibility of the team involved in the determination of the permit to ensure this spreadsheet is completed promptly when applications are received and when they are determined.

Once a month the spreadsheet detailing all internal permitting applications and decisions for the previous month is uploaded to the NRW external website and forwarded to the Welsh Government.

**The interim permitting publication scheme is currently being reviewed and any new requirements will be incorporated into this procedure*

4.2 Our own plans and programmes – Consultation Body (Statutory Advice) arrangements

In our roles as relevant nature conservation body (HRA- plans) and consultation body (SEA) for the plans and programmes of other authorities, as well as for our own plans and programmes that require either SEA or HRA (plans) we have a number of statutory and non-statutory roles including;

- Provision of information on European Sites, their features of interest and conservation objectives.
- Provision of scientific and technical advice and guidance on the environment and natural resources of Wales, including natural heritage, landscape and cultural heritage.
- Provision of statutory comment and representation as 'statutory consultee'

As well as these specific roles in respect of SEA and HRA, we have many other roles and duties arising from our role as land managers/project developers/operators and as the Regulators for some 30+ regulatory regimes. For SEA, there is European caselaw (the 'Seaport' case) that requires the 'functional separation', where Natural Resources Wales or any other authority is both the 'responsible authority (plan maker) and statutory consultant body.

In response to our responsibilities and these principles, a 'functionally separate' Strategic Assessment team (SAT) has been established within the Governance Directorate of NRW. This team's primary role is to fulfil the Consultation Body role for the SEA of NRW's own plans and programmes (legally required by Seaport ruling). However, based on the strong interdependencies between the SEA and HRA (plans) processes, our Board recommended that this team should also fulfil the relevant nature conservation body role on HRA (plans) for NRW's internal plans.

For those plans, programmes and projects produced by Responsible authorities external to NRW, the consultant body role for SEA (programmes and plans) and HRA (plans and projects) is provided by either the Knowledge, Strategy and Planning Directorate or the relevant Operations Directorate, according to the type of plan, programme or project (national/sectoral or regional respectively). However if NRW is formally contracted to develop the SEA or HRA plan level assessment by a third party 'responsible authority' then the Governance SAT team provides NRW's statutory consultee response as the Consultation Body.

4.3 Our own projects – Consultation Body (Statutory Advice) arrangements

For our own projects our Operations Directorates fulfils the Consultation Body role but through a separate team reporting to different Leadership Team manager to the one responsible for the project. The Land Manager role responsible for the project reports through to the Head of Operational Services and the relevant teams responsible for project level Habitats Regulation Assessment Consultation Body role reports through to the Head of Ecosystems Planning & Partnerships.

Where our own project requires planning permission through the Town & Country Planning system, our role as statutory adviser to local authorities within this regime is separate at Leadership Team level to the senior manager accountable for the project. Our role as a land manager responsible for the project is accountable to the Head of Operational Services. The teams who provide the statutory advice as a Consultation Body to enable the Local Authorities as the responsible body for permitted development to make a decision are accountable to the Head of Ecosystem Planning & Partnerships.

5. Our Operational Response when Statutory Adviser and Regulator

Although NRW is a single corporate entity, we will often exercise the distinct functions of statutory advisor and regulator in the context of a single development most notably Nationally Significant Infrastructure Plan developments. As well as using our agreed principles for managing our multiple roles to guide us where we are a regulator we have also taken into account an important theme that runs through administrative law: where legislation confers discretion on a body like NRW, the body must not surrender or abdicate that discretion – to a "policy". The body (NRW in our case) must keep an open mind and consider each case on its own merits: otherwise we would be failing to exercise our discretion. We must keep an open mind and consider the facts of the particular case.

In relation to the Development Consent Order application under the Planning Act 2008, we are a statutory consultee advising the decision maker on the land use planning implications of the development. For those developments which impact on Welsh waters, certain aspects of the development will comprise marine licensable activities for which a licence is required under the Marine and Coastal Access Act 2009. NRW (acting on behalf of Welsh Ministers) is the licensing authority. For those developments which involve a

regulated activity requiring an Environmental Permit under the Environmental Permitting Regulations 2010, NRW is the permitting authority.

There is therefore a distinct legislative framework for NRW's respective functions. The implications for cross-over between the respective functions could be opening up any decision or consent to be challenged upon the grounds of pre-determination and/or bias i.e. that one function has been unduly influenced by the others. Therefore, internal separation between the functions has been maintained with the Statutory Consultee responses for developments requiring planning permission being the responsibility of our Operations Directorates, whilst our National Services Directorate is responsible for all permits, consents and licences.

Annex 1 – When operating as Land Manager and Statutory Adviser and/or Regulator - Roles and Responsibilities

NATURAL RESOURCES WALES AS LAND MANAGER, STATUTORY ADVISOR AND REGULATOR	
ROLE	ROLE & RESPONSIBILITIES
<p>Role 1 – Applicant. Natural Resources Wales is land manager</p> <p>The person who makes an application for a permit. Any registration, exemption, approval, permission, licence, consent, assent or other authorisation.</p>	<p>Operations Directorates Applicant / land manager is Natural Resources Wales</p> <p>Welsh Ministers are notified of all applications at the time they are made</p>
<p>Role 2 - Originator of plan, programme or project is Natural Resources Wales</p> <p>The 'Responsible Authority' in statute for preparing Environmental Assessments: •Strategic Environmental Assessment &or Habitat Regulations Assessment (plans and programmes), •Environmental Impact Assessment &or Habitat Regulations Assessment (projects)</p>	<p>Transparency – publication scheme</p> <p>Knowledge, strategy, Planning Directorate for strategic plans, programmes, projects</p> <p>Operations Directorates for regional & local plans, programmes, projects</p>
<p>Role 3 – Natural Resources Wales is Regulator</p> <p>NRW is the body, as defined by statute, that supervises a particular industry or business activity including its own activities. The provider of a permitting decision / determination.</p>	<p>Transparency – publication scheme</p> <p>National Services Directorate Permitting decision</p> <p>Operations Directorates* Enforcement & Compliance casework *geographical separation</p>
<p>Role 4 - Natural Resources Wales is Statutory Consultee (Planning and Development Control)</p> <p>NRW is the body, as defined by statute, that must be consulted on relevant planning applications. The provider of evidence, information, advice to Local Planning Authorities to allow them to make an informed permitting decision.</p>	<p>Transparency – publication scheme</p> <p>Operations Directorates (separate team to applicant / originator)</p> <p>Receive & reply regional & local</p>
<p>Role 5 - Nature Conservation, Countryside and /or Forestry Consultation Body (environmental assessments)</p> <p>a) NRW is the body, as defined by statute, that gives opinion upon and must be consulted on relevant environmental assessments. The provider of evidence, information or expertise and advice as Competent Authority for plans and programmes (SEA, HRA) and projects (EIA, HRA) as the nature conservation, countryside or forestry body.</p> <p>b) NRW is the body, as defined by statute, that gives opinion upon and must be consulted on relevant environmental assessments.</p>	<p>Transparency – publication scheme</p> <p>a) Evidence & advice role – assessment preparation</p> <p>Operations Directorates Receive & reply Plans, programmes and projects</p> <p>b) Statutory advisory role</p> <p>Governance Directorate Plan / programme due diligence (SEA and HRA)</p>

Annex 2 – When operating as Statutory Adviser and Regulator - Roles and Responsibilities

NATURAL RESOURCES WALES AS STATUTORY ADVISOR AND REGULATOR

ROLE	ROLES & RESPONSIBILITIES				
<p>Role 1 - Applicant</p> <p>The person who makes an application for a permit. Any registration, exemption, approval, permission, licence, consent, assent or other authorisation.</p>	<p>Applicant is external (includes third party on WG Woodland Estate)</p> <p>Customer service centre logged & assigned 'Exceptional' casework identified Corporate risk register entry</p>				
<p>Role 2 - Originator of plan, programme or project</p> <p>The 'Responsible Authority' or plan, programme or project maker in statute for preparing environmental assessments:</p> <ul style="list-style-type: none"> •Strategic Environmental Assessment &or Habitat Regulations Assessment (plans and programmes), •Environmental Impact Assessment &or Habitat Regulations Assessment (projects) 	<p>Originator of plan, programme or project is external. The external applicant may need to prepare a Strategic Environmental Assessment, Habitat Regulations Assessment and / or Environmental Impact Assessment.</p>				
<p>Role 3 – Natural Resources Wales is Regulator</p> <p>NRW is the body, as defined by statute, that supervises a particular industry or business activity including its own activities. The provider of a permitting decision / determination.</p>	<table border="1"> <tr> <td data-bbox="880 934 1161 1061"> <p>National Services Directorate</p> <p>Permitting decision</p> </td> <td data-bbox="1166 934 1439 1173"> <p>Operations Directorate</p> <p>Enforcement & Compliance casework</p> </td> </tr> <tr> <td data-bbox="880 1068 1161 1173"> <p>Operations Directorates</p> <p>Permitting decision (eg SSSI consent)</p> </td> <td></td> </tr> </table>	<p>National Services Directorate</p> <p>Permitting decision</p>	<p>Operations Directorate</p> <p>Enforcement & Compliance casework</p>	<p>Operations Directorates</p> <p>Permitting decision (eg SSSI consent)</p>	
<p>National Services Directorate</p> <p>Permitting decision</p>	<p>Operations Directorate</p> <p>Enforcement & Compliance casework</p>				
<p>Operations Directorates</p> <p>Permitting decision (eg SSSI consent)</p>					
<p>Role 4 - Natural Resources Wales is Statutory Consultee (planning development control)</p> <p>NRW is the body, as defined by statute, that must be consulted on relevant planning applications. The provider of evidence, information, advice to Local Planning Authorities to allow them to make an informed permitting decision.</p>	<p>Operations Directorates</p> <p>Receive & reply regional & local</p>				
<p>Role 5 - Nature Conservation, Countryside and /or Forestry Consultation Body (environmental assessments)</p> <p>a) NRW is the body, as defined by statute, that gives opinion upon and must be consulted on relevant environmental assessments. The provider of evidence, information or expertise and advice as Competent Authority for plans and programmes (SEA, HRA) and projects (EIA, HRA) as the nature conservation, countryside or forestry body.</p> <p>b) NRW is the body, as defined by statute, that gives opinion upon and must be consulted on relevant environmental assessments.</p>	<p>a) Evidence & advice role – assessment preparation</p> <table border="1"> <tr> <td data-bbox="880 1458 1161 1630"> <p>Knowledge, Strategy, Planning Directorate</p> <p>Receive & reply Plans & programmes</p> </td> <td data-bbox="1166 1458 1439 1630"> <p>Operations Directorates</p> <p>Receive & reply Projects</p> </td> </tr> </table> <p>b) Statutory advisory role</p> <p>Governance Directorate</p> <p>Plan / programme due diligence (SEA and HRA) only where NRW are a Partner or act as consultant</p>	<p>Knowledge, Strategy, Planning Directorate</p> <p>Receive & reply Plans & programmes</p>	<p>Operations Directorates</p> <p>Receive & reply Projects</p>		
<p>Knowledge, Strategy, Planning Directorate</p> <p>Receive & reply Plans & programmes</p>	<p>Operations Directorates</p> <p>Receive & reply Projects</p>				

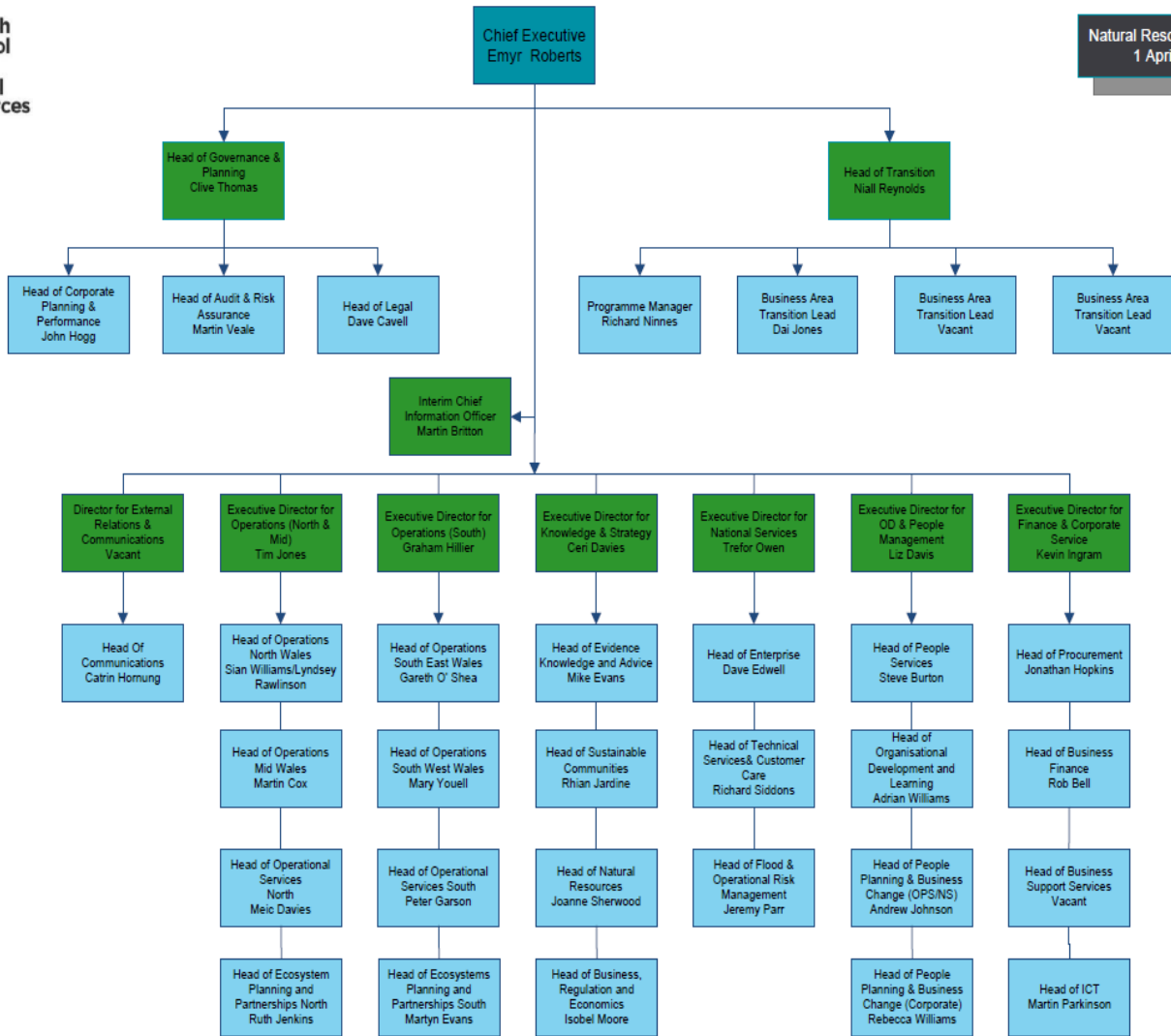
Related policies/procedures

- NRW Publication Scheme
- Guidance on functional separation covering all activities.
- Non - Financial Scheme of Delegation
- Internal Environmental Management procedures.

Annex 3 – Organisation Structure



Natural Resources Wales
1 April 2014



Version 1.0



**Cyfoeth
Naturiol**
Cymru
**Natural
Resources**
Wales

Edwina Hart MBE CStJ AC / AM
Gweinidog yr Economi, Gwyddoniaeth a Thrafnidiaeth
Minister for Economy, Science and Transport

Agenda Item 5.3



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref
Ein cyf/Our ref DC/EH/1965/14

Alun Ffred Jones AM

Chair Environment and
Sustainability Committee

20 June 2014

Dear Alun

Thank you for your letter of 5 June about the proposals for the M4 around Newport.

My officials are currently reviewing responses to the recent consultation on a draft Plan for the M4 Corridor around Newport and will shortly report to me on the findings which will inform the next stage of the decision-making process.

Therefore, at this stage, and because of the need to remain fully impartial and follow all due process, it is not possible to provide any further information than I have already provided to the Committee or is already in the public domain.

Thank you for the invitation to attend a Committee meeting. As there is a formal decision-making process ongoing, unfortunately I am unable to accept an invitation to attend a Committee meeting at present.

A handwritten signature in black ink, appearing to read 'Edwina Hart', written in a cursive style.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

English Enquiry Line 0845 010 3300
Llinell Ymholiadau Cymraeg 0845 010 4400
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Y Pwyllgor Amgylchedd a Chynaliadwyedd

Environment and Sustainability Committee

Edwina Hart AM
Minister for Economy, Science and
Transport
Welsh Government

5 June 2014

Annwyl Edwina

Welsh Government Proposals for the M4 around Newport

You will be aware that the Committee has been considering the Welsh Government's proposals for the M4 around Newport and that we have taken evidence from various stakeholders and experts.

A number of concerns have been raised about the assessment of the potential environmental impacts of the proposals for the M4 Corridor around Newport. Stakeholders have expressed concerns about both the validity of Strategic Environmental Assessment (SEA) process followed to date and the content of the Environmental Report published alongside the consultation document as part of that process.

1. Process for Selecting and de-selecting options

Evidence provided to us has questioned whether the processes followed for the selecting and de-selecting of options for consultation and environmental assessment have met the requirements of the SEA Directive. In particular, we have heard concerns about selection process of the options contained in the M4 Corridor around Newport

consultation and how the de-selection of options contained M4 CEM consultation was carried out.

Given that a new motorway was not included as an option in the M4CEM consultation stakeholders are unclear about the reasons for the selection of the Black Route as the preferred option. Stakeholders have also told us that there is a lack of clarity as to the status of the Environmental Report that was published alongside the M4CEM in November 2012 and as a result its relationship to the consultation on the M4 Corridor around Newport. This confusion has led to questions about the validity of the SEA process followed to date.

As such we would be grateful if you could set out:

- The process that was followed for the selection and de-selection of options between the M4CEM Consultation and the M4 Corridor Around Newport Consultation and how you believe the processes followed by Welsh Government meet the requirements of the SEA Directive.**
- The reasons for the selection of the Black Route as the preferred option in the M4 Corridor Around Newport Consultation given that the M4CEM consultation did not include a new motorway option.**
- The status of the November 2012 Environment Report on the M4 CEM and confirmation as to whether or not it was withdrawn.**
- If the report was withdrawn the reasons for this decision.**
- The relationship between the November 2012 M4CEM Environmental Report and the M4 Corridor around Newport Environmental Report.**

2. Options Assessed

Some stakeholders have questioned whether the three options assessed as part of the consultation on the M4 Corridor around Newport are sufficiently distinct enough to allow for meaningful comparison as required by the SEA Directive. In your letter to us on 19

March you outlined that consideration was being given as to whether or not the Blue Route would be considered as a reasonable alternative to the draft plan.

Given the concerns expressed about the distinctiveness of the three options included in the M4 Corridor around Newport consultation we would be grateful if you could confirm:

- Whether you intend to assess the Blue Route as a reasonable alternative in accordance with the requirements of the SEA Directive.**
- If you do intend to assess the Blue Route whether you intend to consult stakeholders on the results of the assessment.**
- Whether the Blue Route will be subject to a published WelTAG evaluation allowing it to be directly compared to the other route options being considered.**

3. Content of the Environmental Report

We note that the responses from NRW's Operations South Directorate and Governance Directorate make a number of recommendations about the content of the Environmental Report on the M4 Corridor around Newport. In particular we note that both Directorates express disappointment that some of the issues raised by the body in its responses to the Scoping Report on the environmental assessment were not taken into account in the production of the final Environmental Report.

With regards to biodiversity impacts, NRW's Governance Directorate concludes that it is unable to agree with the assessment's findings of impacts on biodiversity as 'minor negative' and recommends that this is amended to 'major negative'. Both of NRW's Directorates also question the completeness of the assessments contained in the Environmental Report on soil contamination, greenhouse gas emissions, water quality, landscape and townscape. In addition NRW

outlines that it would expect the Environment Report to have assessed the impacts of not only the motorway itself but any ancillary junction and construction developments.

Given the conclusions reached by both NRW Directorates we would be grateful if you could outline to the Committee:

- Why recommendations made by NRW in the Scoping Report were not taken into account in the production of the Environmental Report.
- The reason why the Environmental Report concluded that the proposals would only have a ‘minor negative’ impact on ‘biodiversity’ and your response to NRW’s conclusion that the proposals would have a ‘major negative’ impact.
- How you are taken account of the other concerns and questions raised by NRW about the content of the Environmental Report.

4. Consideration of public transport issues.

We note that your letter of 20 December 2013 states “traffic modelling during the draft plan development identified that a highly significant increase in public transport usage in the Newport area would not solve the problems on the M4 around Newport” and that “a **dedicated separate task group**” is taking forward public transport improvements.

We understand that the *M4 Corridor Enhancement Measures Public Transport Overview* considered illustrative measures with an estimated capital cost of around £300m. Evidence provided to us suggests that this work was undertaken before the scale of the Metro proposals, which estimates total investment of £2bn, became clear.

We note that in its response to the Environmental Report NRW Operations South Directorate recommends that findings from the Metro study ‘may influence the evidence presented relating to problems, aims and goals for the M4 around Newport consultations and inform decisions made on sustainable options’.

We also heard evidence suggesting that integrated transport policy should consider the effect of all interventions together, and that the combined effect of sustainable / public transport and highway interventions can have a greater impact on travel behaviour than public transport investment alone. It has been suggested that the appraisal of the M4 highway schemes should consider all public transport and sustainable transport options.

We would be grateful if you could set out:

- **How the public transport measures considered during the M4 CEM preparatory work compare to those included in the Metro Impact Study;**
- **What assessment has been made of the potential for the Metro to alleviate congestion on the M4 around Newport, and whether you intend to assess its potential contribution to addressing the problems, aims and goals presented in the consultation on the M4 Corridor around Newport; and**
- **Your response to the suggestion that an integrated transport strategy should consider sustainable transport and highway interventions together.**

5. Validity of Traffic Forecasts

We note that M4 forecasts are produced using the Department for Transport's (DfT's) forecasting methodology, and that you have referred to observations contained in DfT's Command Paper *Action for Roads* and research by Prof Jones and Dr Le Vine.

However, we have heard evidence, including academic evidence from Dr Le Vine, which suggests that DfT's methodology has consistently predicted significant traffic growth while actual traffic data shows the trend to be broadly flat. Weaknesses in the model have been suggested, including an assumption of increasing future car ownership which has been described as difficult to justify given actual trends.

Witnesses emphasised significant uncertainty in future traffic trends, and that the factors underlying the recent levelling in traffic trends are currently poorly understood.

Given this uncertainty we have been advised that planners should consider a “scenario approach” to assess the impact of schemes under various “alternative futures”.

Finally, while the validity of the forecasting model has been questioned in evidence, it has also been suggested that if the forecasts on which the M4 proposals are based are correct, the options considered will be insufficient to improve traffic conditions.

We would be grateful if you could set out:

- **Your response to the suggestion that the forecasting approach used in developing proposals for the M4 has tended to predict growth where actual trends are flat, and does not take account of uncertainty in future traffic trends;**
- **Details of how the forecasts on which the current proposals are based compare to actual traffic flows in the period since the forecasts were produced;**
- **Your response to the suggestion that, as a result of uncertainty about future trends, a scenario approach to planning, which considers how schemes perform under various “alternative futures”, should be adopted; and**
- **Your response to the suggestion that if the Welsh Government traffic forecasts are correct the current proposals will not significantly improve traffic conditions.**

6. Financial viability and opportunity cost

We note the estimated costs for the options contained in the M4 Corridor Around Newport consultation. However, we are unclear whether the cost of environmental mitigation, compensatory habitat etc., as well as enhancements to the local road network, have been

considered by the Welsh Government and how these costs will affect the final cost of the scheme.

We have also heard evidence suggesting that the current proposals are unnecessarily expensive, risking a significant opportunity cost if excessive resources are allocated to the M4 around Newport. In particular, it has been suggested that using borrowing powers to fund the scheme would limit the opportunity to use borrowing for other schemes.

We are aware that the UK Government will provide early access to limited capital borrowing powers in advance of the Wales Bill to invest in the M4. However, we note that the Wales Bill Command Paper makes clear that it will provide Welsh Ministers with **up to £500m of current borrowing powers** from April 2018. We also note that the Wales Bill Explanatory Memorandum states that any borrowing under existing powers **after the passage of the Bill**, explicitly including borrowing for the M4, will count towards the £500m capital borrowing limit.

We are not clear about how this approach to borrowing powers will affect the delivery of proposals for the M4 around Newport given that the total proposed borrowing limit is approximately half that of the current estimated cost of the scheme.

We would be grateful if you could set out:

- What consideration has been given to the cost of environmental mitigation, compensatory habitat and local highway interventions associated with the proposals for the M4, and when the total cost of any scheme including these elements will become clear;**
- Your response to the suggestion that the M4 draft plan and reasonable alternatives currently proposed represent a significant opportunity cost;**

- What assessment has been made of the actual impact of delivery of the M4 draft plan on other capital programmes / investments; and
- How investment in the M4 at Newport will be funded, including the portion of the £500m borrowing limit envisaged in the Wales Bill which will be used and how any balance will be funded.

7. Timeline for your response and appearance before the committee

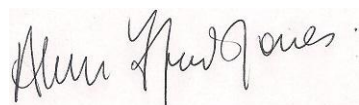
We very much wish to consider your response to the above points before drawing our final conclusions. We intend to draw these conclusions before the summer recess. Therefore, I should be grateful if you could provide us with a response by **Friday 20 June 2014**.

Additionally, we note that you have declined our invitation to appear before us on the basis of legal advice that you have received. I would be grateful if you could indicate a date from which we can expect you to appear before us in relation to this issue.

The Clerk to the committee is happy to liaise with your officials should they wish to discuss any aspect of the requests contained within this letter.

It is our intention to publish this letter on our website, given the public interest in this issue.

Yn gywir,



Alun Ffred Jones AM

Chair of the Environment and Sustainability Committee