



City Management & Public Protection Policy and Scrutiny Committee

Date:	12 th June 2019
Classification:	General Release
Title:	Action on Fly-tipping
Report of:	Sara Sutton – Executive Director for City Management & Communities
Cabinet Member Portfolio	Cabinet Member for Public Protection & Licensing Cabinet Member for Environment & City Management
Wards Involved:	All
Policy Context:	Clean Streets
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1. Executive Summary

- 1.1 Satisfaction with the council's waste collection and street cleansing services remains exceptionally high (93% and 91% respectively in the 2018 City Survey) but fly-tipping continues to be a source of substantial frustration for many residents and businesses. This report provides an overview of waste enforcement activity undertaken during 2018-19, the work of the Street Waste Action Team, and two new initiatives to tackle fly-tipping – the trial use of CCTV monitoring and utilising 'nudge' theories to improve behaviours.

2. Key Matters for the Committee's Consideration

- How can the council more effectively communicate 'waste rules' to residents and businesses?
- Does the committee support the programme for the continued removal of waste and recycling bin sites that are frequent fly-tipping hot-spots?
- What further measures should the council consider taking to effectively tackle fly-tipping?

3. Background

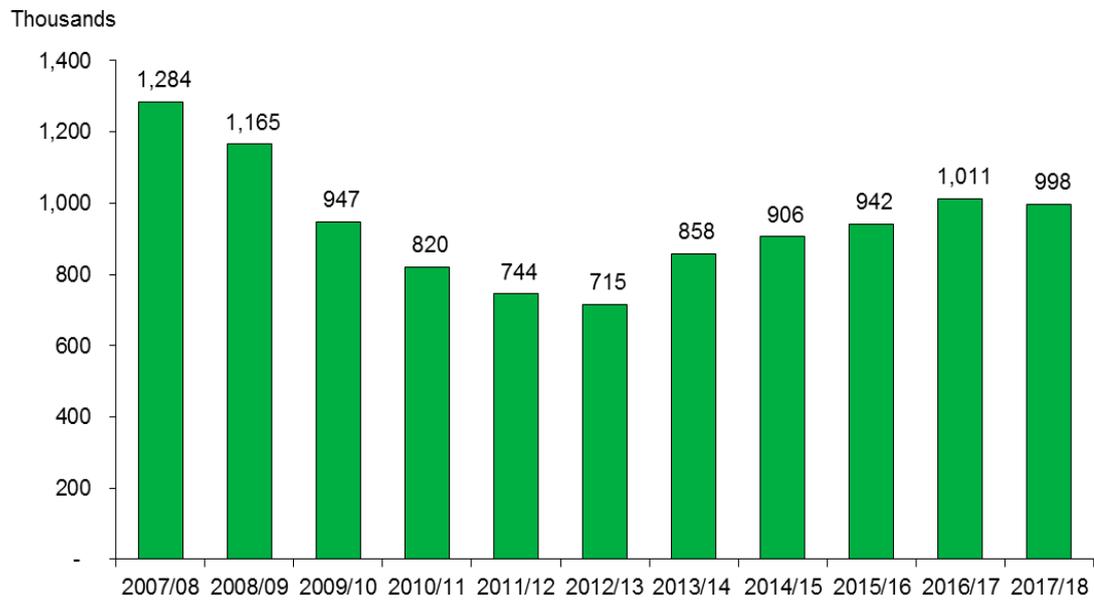
3.1 Fly-tipping is defined as the 'illegal deposit of any waste onto land that does not have a licence to accept it'. Tipping a mattress, electrical items or 'bin bag' of rubbish in the street causes a local nuisance and makes an area look uncared for. At the larger end of the scale fly-tipping can involve truckloads of construction and demolition waste being tipped although vehicle related fly-tipping remains relatively rare in Westminster.

3.2 Much of the fly-tipping activity in Westminster happens around the 141 Big Black Bin (BBB) sites that are predominantly located in high density residential areas. The BBB service was first introduced over 30 years ago. These sites are widely misused, with significant levels of recycling material in general waste bins and are hotspots for dumping. From the City Survey we know that 30% of our residents feel that litter and waste on the street is a "big" or "very big" problem". A recent audit found that:

- 35% of waste placed in street waste bins, could have been recycled.
- 86% of these sites had bulky waste dumped next to the bins.
- 82% of sites had black bag dumped by the bins, despite their being space in the bins.

3.3 Incidents of fly-tipping across England had shown steady declines from 2007/08 until 2013/14, when there was an increase to 858,000 incidents. Since then, the number of fly-tipping incidents had been increasing year-on-year until 2017/18 when there were 998,000 incidents reported – a marginal decrease of 1% from the previous year. In London however, fly-tipping has increased at twice the rate observed nationally, rising by 14 per cent from 2015/16 to over 366,000 reported incidents in 2016/17. London boroughs spend £18 million each year dealing with fly-tipping. Fly-tipping in Westminster costs an estimated £1m annually. A more accurate estimate of the total cost is difficult to calculate as fly-tips are cleared as part of the 'business as usual' activities of the waste collection and street cleansing services.

Chart 1 – National Trend in Fly-tipping Incidents 2007-18



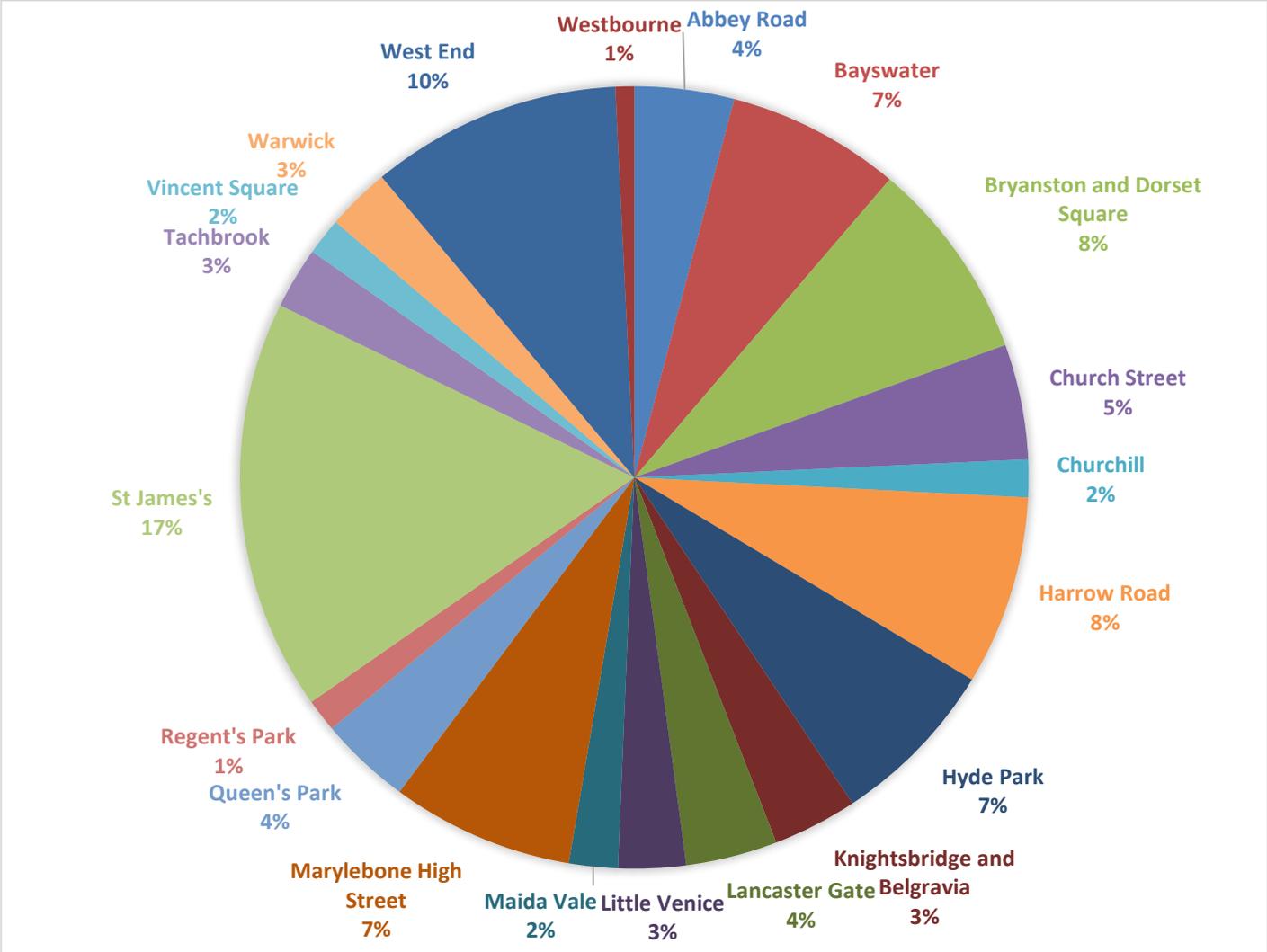
3.4 As can be seen in Table 1 below, it is difficult to draw any comparisons with fly-tipping data from neighbouring boroughs. The most likely explanation for the wide variability in data across the boroughs is likely to be the numbers of council officers reporting in each borough and the relative convenience/usage of complaints reporting channels by local residents.

Table 1 - London Borough Fly-tipping Comparison 2016/17

	'Black Bag'	As % of WCC	Other H/h Waste (e.g. bulky waste)	As % of WCC
Westminster	1685	-	4251	-
Brent	321	-81%	15,425	+263%
Camden	1181	-30%	1808	-58%
Kensington & Chelsea	3572	+112%	2708	-57%
Lambeth	506	-70%	1736	-59%
Southwark	2936	+74%	7669	+80%

3.5 The breakdown of fly-tipping reports by ward remains very consistent with the 'commercial' areas representing the largest proportion of reports. The increased presence of council officers and inspections by BID Ambassadors is the principle reason for the difference in reporting levels.

Chart 2 – Abandoned Waste ('Fly-tip') Incidents by Ward 2018



3.6 The council actively participated in a study of fly-tipping across London conducted last year by Keep Britain Tidy and the London Environment Directors Network (LEDNET). A link to the full report is included as a Background Paper but relevant findings included:

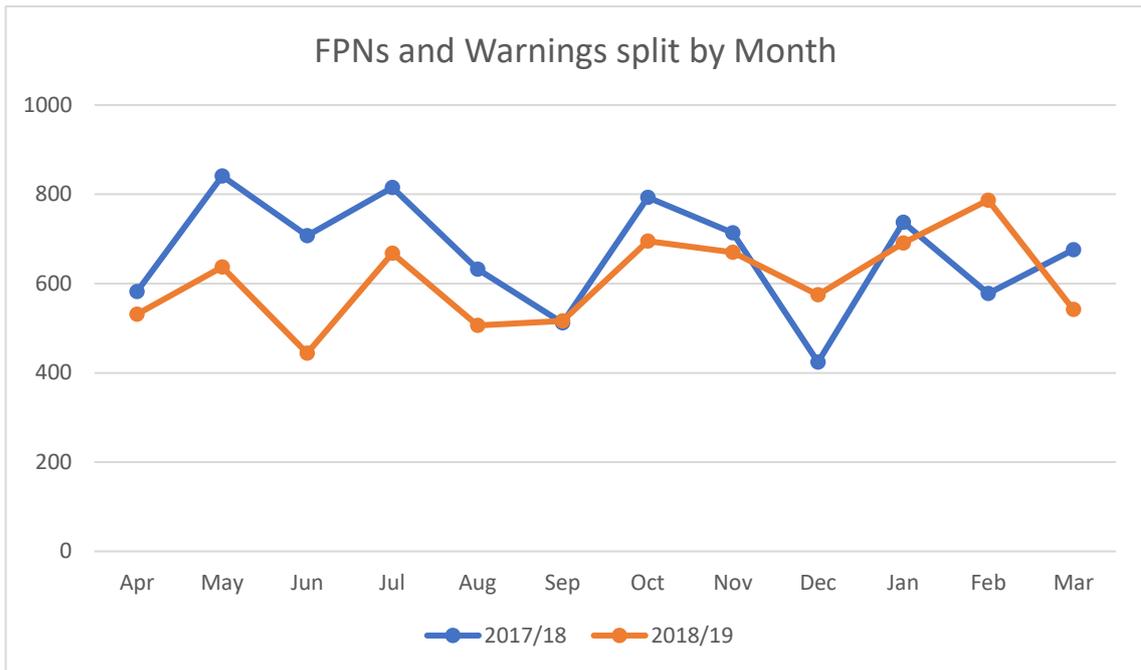
- While the vast majority of Londoners dispose of their waste responsibly, one in five Londoners disposed of their waste in a way that constitutes 'fly-tipping' over the past two years.
- The most common fly-tipping behaviours were leaving black bags next to household bins on collection day, leaving cardboard boxes on and around public recycling bins and leaving donations outside a charity shop when it is closed.
- Those in younger age groups (18-24 and 25-34 year olds) were considerably more likely to say that they had fly-tipped black bags/cardboard waste compared to all other age groups, whereas fly-tipping of bulky/other household waste items was somewhat more evenly spread across the age groups.
- The results suggest that people of other European nationalities are more likely to fly-tip black bags and cardboard waste compared to those from other regions, including the UK. There is evidence to suggest that this is largely driven by respondents from these nations not realising that what they were doing is 'wrong'.
- People who live in smaller household accommodation types were more likely to fly-tip both black bags/cardboard and bulky/other items. This may be due to limited waste storage space in smaller household accommodation types.
- Fly-tipping of black bags was highest amongst full time students and full-time workers, indicating that there may be a perceived lack of time or convenience issue influencing behaviours. By contrast, fly-tipping of bulky waste was highest amongst unemployed people. This may be due to the costs associated with waste removal by council or private waste collectors, which was highlighted as a key barrier by participants in the focus groups (note: Westminster currently provides free bulk waste collections for residents in receipt of benefits).
- Having regular access to a vehicle does not appear to have an influence on the likelihood that a person living in London will fly-tip.
- Respondents in the AB and C1 social grades were more likely to fly-tip black bags/cardboard waste compared to those in the C2 and DE groups, whereas those in the C2 and DE grades were more likely to fly-tip bulky/other household waste.
- A person's feeling of personal connection to their local area, and the length of time they have lived there, does not appear to be a determining factor in

their likelihood to fly-tip. This suggests that other factors have a stronger influence on fly-tipping behaviours.

4. Overview of Waste Enforcement Activity

- 4.1 The aim of enforcement against waste offences such as littering and fly-tipping is to protect the safety, wellbeing and environment of all those who live, work and visit the borough. Officers adopt a positive and proactive approach towards ensuring compliance, by helping businesses and individuals understand and meet regulatory requirements more easily and responding proportionately to regulatory breaches.
- 4.2 Officers recognise that the failure to comply often stems from unintended ignorance, carelessness, or a lack of training and management control. Educating through the provision of information and advice, as well as serving notices that provide the opportunity to remedy the breach, are examples of the important tools that officers will use to manage risks. However, in some cases failure to comply may risk causing serious harm, be the result of deliberate illegal behaviour, or failure to correct an identified serious problem. In these instances, officers will issue Fixed Penalty Notices (FPNs).
- 4.3 The table below shows the number of Fixed Penalty Notices (FPN) and warnings issued since 2017. There has been an increasing trend of enforcement action since the implementation of the new Effective Neighbourhood Working (ENW) approach in September 2018, peaking in February 2019. The transition to ENW in the months leading up to its implementation in September 2018 and a reduction in staff numbers meant the number of FPNs issued decreased comparative to the previous year but a recent recruitment drive will see City Inspectors up to full capacity in June/July 2019.

Chart 3 - FPNs and Warnings by Month, FY 17/18 and 18/19



4.4 Below is an overview of the number of FPNs (including warnings) by ward.

Chart 4 - Overall % FPNs and Warnings 18/19

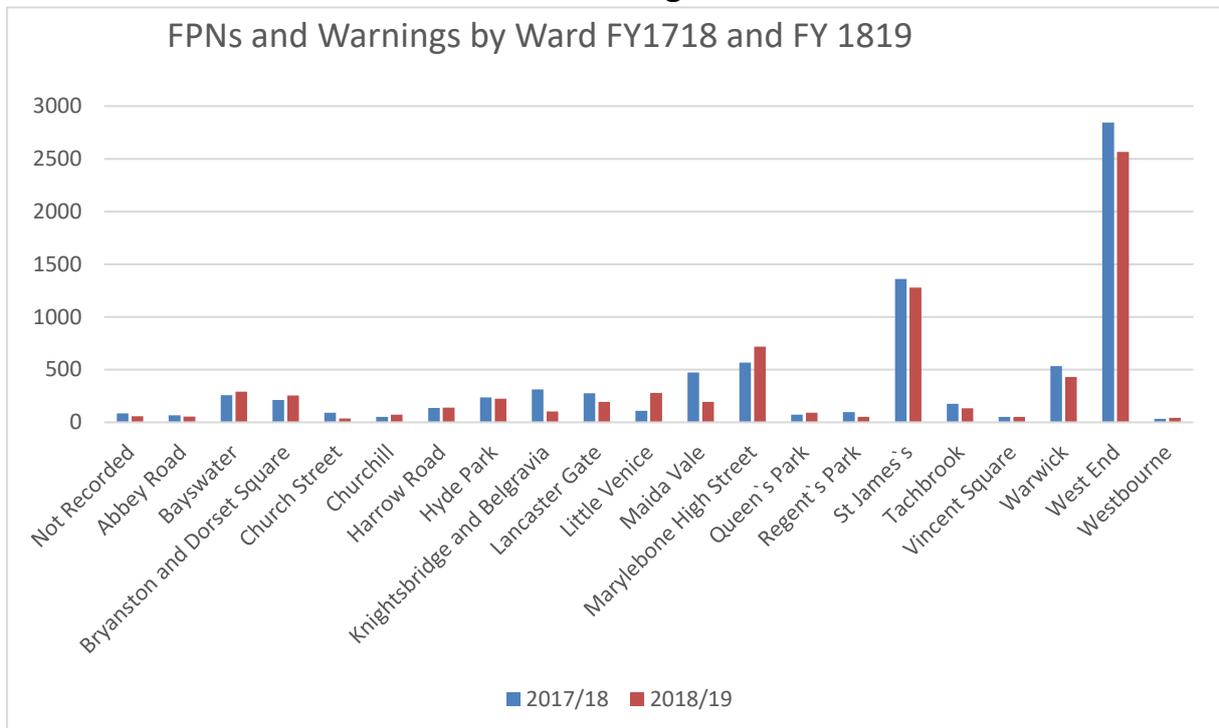


Table 2 - Total Number FPNs and Warnings 17/18 and 18/19

Ward	2017/18	2018/19	Grand Total	% of all FPNs & Warnings
Not Recorded	86	59	145	0.9%
Abbey Road	68	56	124	0.8%
Bayswater	258	290	548	3.6%
Bry. & Dorset Sq.	211	255	466	3.0%
Church Street	92	38	130	0.8%
Churchill	52	72	124	0.8%
Harrow Road	135	141	276	1.8%
Hyde Park	236	223	459	3.0%
Knight & Bel.	312	104	416	2.7%
Lancaster Gate	277	194	471	3.1%
Little Venice	108	280	388	2.5%
Maida Vale	473	193	666	4.3%
Mary. High St	567	718	1285	8.4%
Queen`s Park	73	90	163	1.1%
Regent`s Park	98	53	151	1.0%
St James`s	1361	1278	2639	17.2%
Tachbrook	175	132	307	2.0%
Vincent Square	52	51	103	0.7%
Warwick	532	430	962	6.3%
West End	2846	2566	5412	35.3%
Westbourne	34	43	77	0.5%
Grand Total	8046	7266	15312	100%

- 4.5 As would be expected the 'central commercial' wards accounts for 58% of all FPNs and Warnings, with West End and St James's Wards accounting for 52.5% of all FPNs and Warnings. Given that a vast majority of FPNs issues relate to the Commercial premises we would expect these Wards to consistently feature highly.
- 4.6 Comparative to the year before, overall there has been an overall 7% reduction warnings issued, and a 10% reduction in FPNs. This may be a result of an increase in compliance, however it may also be following the introduction of Effective Neighbourhood Working mid-year causing an associated lag in interventions whilst new officers embed the new ways of working.
- 4.7 The below chart and table compares our enforcement interventions with that of our neighbouring local boroughs for 2017-18.

Chart 5 - FPNs 2017/18 across neighbouring boroughs

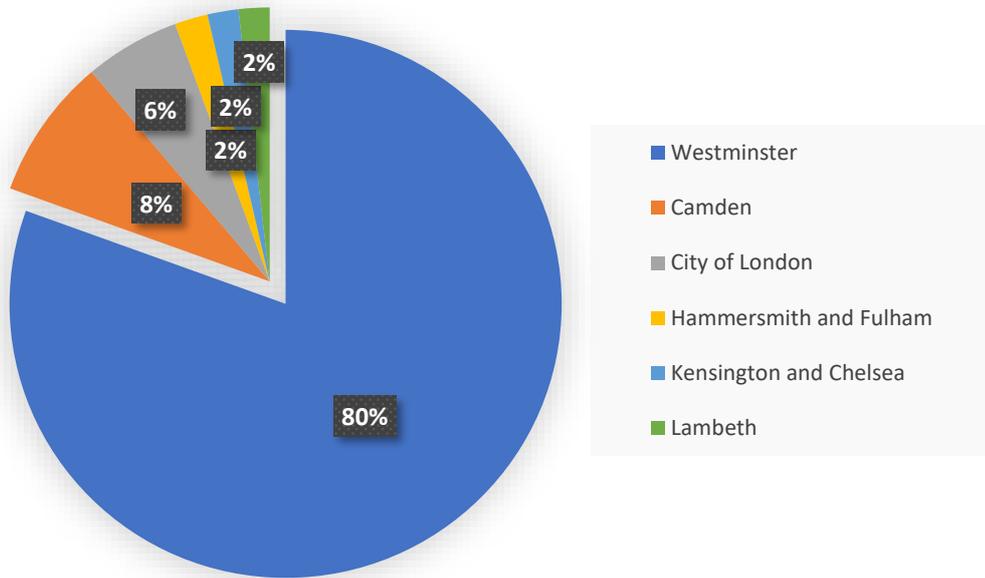


Table 3 - Breakdown of FPNs across the neighbouring boroughs 2017/18

Borough	Number of FPN Actions
Westminster	8045
Camden	832
City of London	559
Hammersmith and Fulham	194
Kensington and Chelsea	181
Lambeth	181
Total	9992

4.8 The total number of FPN Actions for the whole London region in 2017/18 stands at 50,707; Westminster therefore accounts for 15.9% of all FPN Actions in London (comparative data for 2018-19 is not yet available).

5. Street Waste Action Team

- 5.1 The SWAT project was launched in February 2018 as part of the Leader's #My Westminster programme. It aims to educate local resident's behaviour around waste and recycling, particularly duty of care around communal on street bins, dumping around street furniture, and doorstep presentation. Each ward undergoes a typical 6-8 week programme that involves baseline monitoring, engagement, compliance, and a later comparative analysis.
- 5.2 To date, 10 wards have been completed (Table 4 below). Both West End and St James's wards will both be captured under a new commercially focussed project in partnership with local Business Improvement Districts (BIDS).

Table 4 – SWAT Ward Deployments to Date

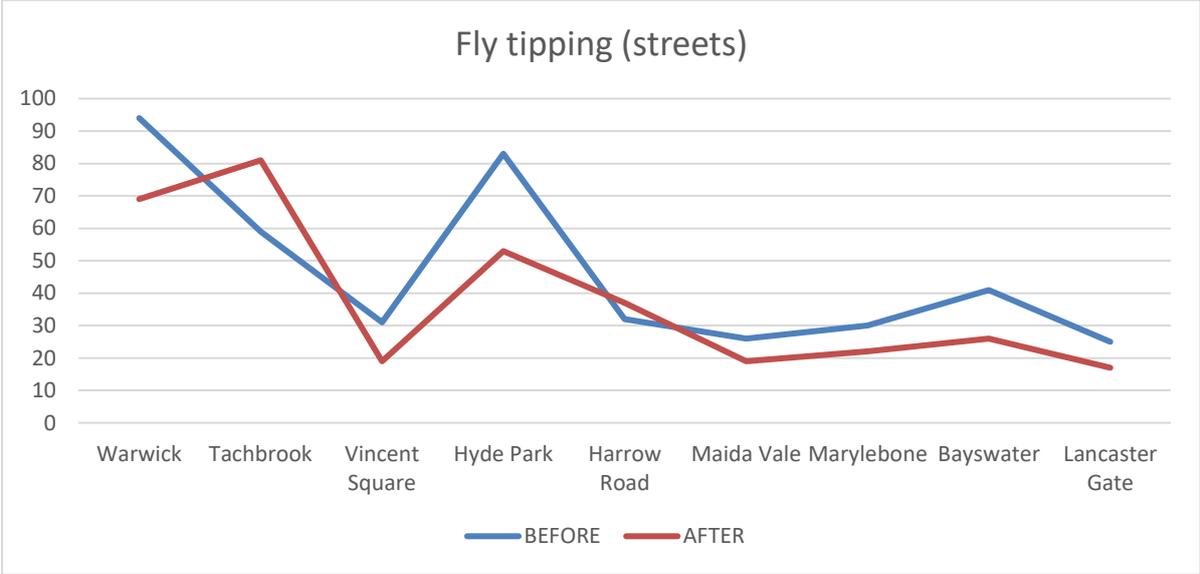
WARD	DATE BEGAN	STATUS	Fly-tipping, dog fouling & overflowing litterbins			Fly-tippin around big black bins			Correct Doorstep Presentation			Compliance	
			Before	After	% difference	Before	After	% Difference	Before	After	% difference	Warnings	Fixed Penalty Notices
Warwick	12/02/2018	Completed	94	69	26.60%	26	30	15.30%	336	264	21.40%	25	9
Tachbrook	12/02/2018	Completed	59	81	37.20%	55	10	81.80%	285	131	54%	13	5
Vincent Square	19/03/2018	Completed	31	19	38.70%	20	4	80%	112	55	50.80%	6	3
Hyde Park	14/05/2018	Completed	83	53	36.10%	24	12	50%	34	98	188%	20	27
Harrow Road	09/07/2018	Completed	32	37	15.60%	14	21	50%	34	63	85.20%	23	4
Maida Vale	06/08/2018	Completed	26	19	26.90%	13	0	100%	63	34	46%	28	3
Marylebone High Street & Bryanston & Dorset Square	24/09/2018	Completed	30	22	26.60%	20	15	25%	91	61	32.90%	81	27
Bayswater	07/01/2019	Completed	41	26	36.50%	32	1	96.80%	52	51	1.90%	152	23
Lancaster Gate	04/02/2019	Completed	25	17	32%	24	10	58.30%	44	27	38.60%	87	34
Queen's Park	29/04/2019	Pending											
Church Street		Not Started											
Little Venice		Not Started											
Westbourne		Not Started											
Regent's Park		Not Started											
Fitzrovia		Not Started											
St James's*		Not Started											
Westend*		Not Started											
Knightsbridge		Not Started											
Churchill		Not Started											

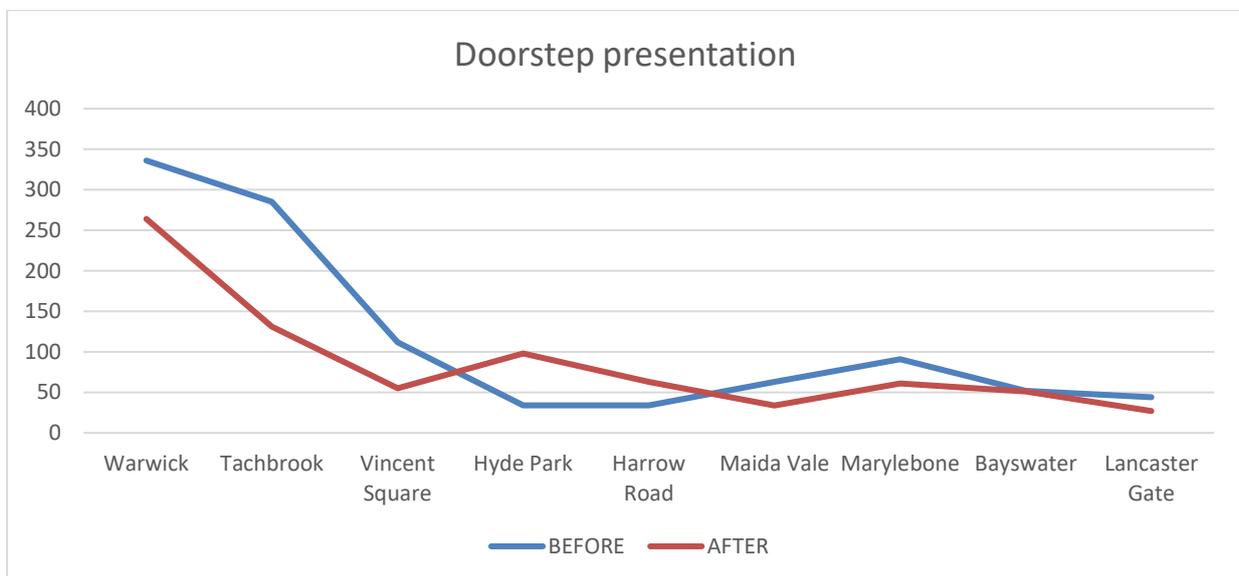
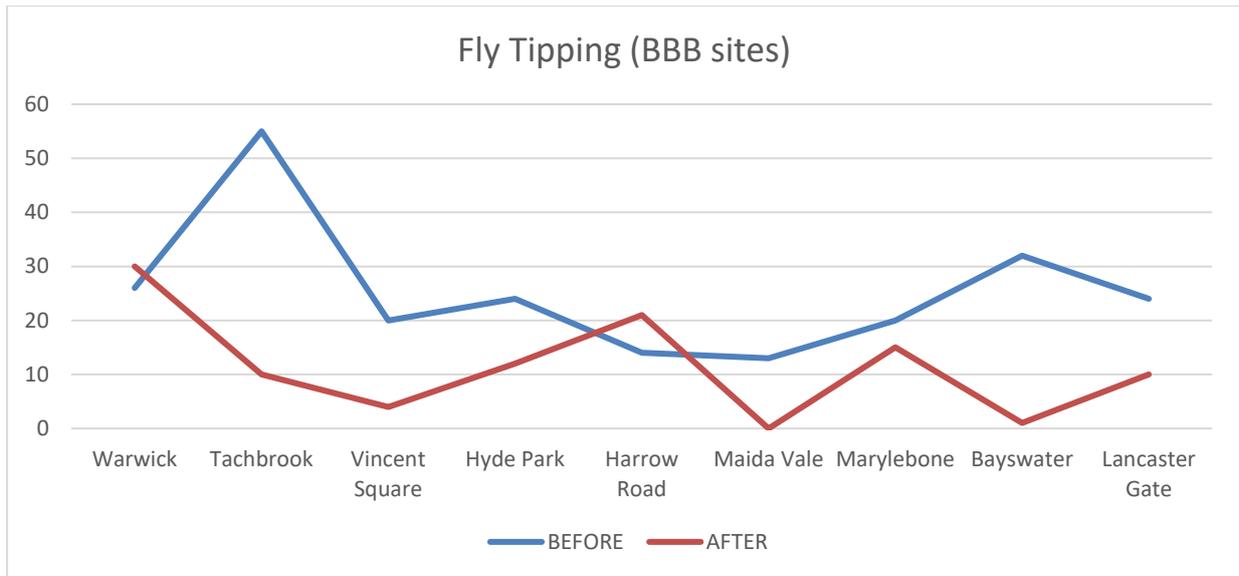
5.3 The 'before' and 'after' measurement of the cleanliness of a ward is calculated through three sub-sets:

- Fly-tipping (Streets) – This includes bags/bulky waste dumped around tree bases, litter bins or other sites where the owner of the waste is not immediately obvious;
- Fly-tipping BBBs – This is bags/bulky waste next to street bin sites;
- Doorstep Presentation – This is where bags have been put immediately outside a property but at the wrong time or day.

5.4 Charts 6-8 below summarise the change in 'cleanliness' following each SWAT ward project. The results are broadly positive across all categories for the majority of wards. The SWAT project had no discernible impact on fly-tipping activities in Harrow Road ward and there is no clear reason for the sudden increase in Hyde Park ward residents leaving waste outside their properties on incorrect days/times after the project was completed.

Charts 6-8





5.5 Related to the work of the SWAT team, there has recently been a series of projects to remove problematic street bin sites. After consultation and agreement from ward members, notices are placed on problematic bin sites advising residents of their removal in seven days' time. Leaflets are also distributed to neighbouring residents within a radius of approximately 150 metres. Vehicles continue to visit sites at least three times each day to clear fly-tipped waste following the removal of the bins. After a six week trial removal period an assessment is made as to whether the trial has been successful and bins either returned or their removal confirmed as permanent.

5.6 Although the SWAT project didn't have any notable impact on fly-tipping behaviours in Harrow Road ward, the subsequent removal of the highly problematic bin site at Ashmore Road junction with Shirland Road has substantially improved local cleanliness with an almost immediate end to fly-

tipping at this location. Image 1 & 2 shows an example of the site at its worst from last year. Flower planters were installed in the area (image 3) which had an immediate effect which saw minimal amounts of waste (images 3 & 4) being left which officers have been monitoring.

Image 1



image 2



Image 3



image 4



6. CCTV Trial to Combat Fly-tipping

- 6.1 As part of the council's interventions to crack down on deliberate fly-tipping, from 24th May 2019 officers will be operating a four-week trial of overt CCTV in Porchester Terrace North in Bayswater – a known hotspot for this offence.
- 6.2 The CCTV equipment for the trial is being loaned to the council free of charge. The CCTV will focus in and around Big Black Bin sites and will record when movement is detected. The equipment will also be fitted with Automatic Number Plate Recognition (ANPR) to evidence vehicle ownership in any waste offence committed.
- 6.3 With the footage, officers will be able to test whether the CCTV increases our ability to identify and take enforcement action against fly-tipping offenders. It will also help officers gather a complete picture and understanding of who the offenders are (commercial, building waste, residential etc.), and when the offences are being committed, to develop a targeted plan of interventions.
- 6.4 Initial feedback and results from the trial will be reported verbally at the meeting.

Picture 1 – Barking & Dagenham’s CCTV YouTube Channel



7. Behavioural Insights Project

7.1 The Council has been successful in applying to be part of the Behavioural Insights Programme, run by the Local Government Association. The programme provides a £25,000 match funded grant to use 'nudge theory' to encourage people to make better choices. The project will focus on using behavioural insights to reduce abandoned waste on streets and around communal waste facilities. These facilities are often referred to as Big Black Bin Sites and are widely misused.

7.2 Following a competitive tendering exercise, Ogilvy Consulting Behavioural Science Practice have been appointed to work on this project. Ogilvy's Behavioural Science Practice has significant knowhow, having worked in this field for over seven years and has executed 100's of behavioural insight trials for clients from across the world. Furthermore, as the practice sits within the advertising giant Ogilvy, they will bring with them a background of changing behaviour through creative messaging. This team will work hand in hand with our communications and design team to create a tailored approach that will consider:

- How might we overcome the negative, visual social norm that bags at the side of the bins reinforces they are ok to be placed there?
- Can we help bring neighbourhoods together to co-create ideas they are proud of?

- Can we also make being good with bin bags feel like a socially valuable behaviour?
- Would more aesthetically pleasing bins promote prosocial behaviours and good recycling habits?
- Can we discourage dumping bulky items by calling out that this is NOT the place for them?

7.3 The project involves a four-stage approach (Diagnose, Discover, Design, Do). Each stage is briefly summarised below:

Diagnose – Ogilvy are working with key project stakeholders to agree project parameters, timescales and deliverables. This stage will identify the timelines for the project and draft a project scope, trail design and power analysis for sign off by the LGA. We will identify potential risks, resource and feasibility analysis for the project. **(Complete)**

Discover – The project team will work with Ogilvy and key stakeholders to ensure we build a true picture of current behaviour around littering, abandoned waste and recycling in Westminster. We will conduct both primary and secondary research that incorporates the following, analysis of the bin sites. This will involve working with waste teams and key stakeholders to gain their insight and to analyse any existing research and data we have. This information will be combined with existing academic research and psychologically similar challenges in this area. **(In Progress)**

Design – Ogilvy will take the detailed research and analysis to create a novel, effective behaviourally optimised approach to changing these bin sites to improve behaviour. It is crucial for this project to create an intervention that offers a new solution to deter people from abandoning their waste and encourage them to recycle. Ogilvy will facilitate a half day ideation workshop with key project stakeholders from Westminster. From this session Ogilvy will deliver a maximum 6 concepts and illustrations for Westminster to brief our internal design teams with to ensure behavioural insights are successfully embedded in production. Westminster will then conduct printing, production and share photos for Ogilvy to approve prior to trial commencing. **(May-July 2019)**

Do – The final phase incorporates the production, roll-out and evaluation of our interventions trial. At this stage we anticipate a three-month pilot period where our interventions are tested, and behaviour is carefully measured. We will create an experimental design briefing template to confirm what we are to measure, the number of conditions, how long we need to test, and the samples size needed for significant results. **(August – December 2019)**

7.4 An update will be provided to the Committee once this project has been completed and evaluated.

8.0 Future Waste Strategy/Enforcement Interventions

8.1 A Waste Governance Group has been created which involves different departments coming together in partnership to achieve the City for All vision of a “City that offers excellent local services”. Regular meetings are taking place with representatives from Comms, Policy, Waste and Parks and City Inspectors attending regularly to drive short- and long-term objectives of the waste portfolio which includes Policy, Digital and CCTV. This group will provide the delivery of such areas going forward.

8.2 City Inspectors have several new recruits starting employment in June and July. As part of their induction they will be provided full training on our waste procedures and policy. The training will also be available to more experienced staff who may require a refresher course. Training will be ongoing in the form of classroom and on the job training with quality assurance of the officer’s work being monitored by senior officers.

8.3 Officers are engaging closely with businesses in areas of the West End of the due to non - compliance with our waste regulations. City Inspectors are educating commercial premises in relation to waste collection times, and how and where they present their waste. City Inspectors are following up where necessary with enforcement action also working closely with Heart of London in terms of obtaining long term solutions.

8.4 Another project is also being developed to tackle fly-tipping specifically related to short-term let properties. This will involve better liaison with estate agents so that tenant information packs include guidance on waste disposal requirements and cleaning companies who frequently clean after ‘Air BnB’ type lettings. This project will be developed in liaison with the short term lettings planning enforcement team.

8.5 Development is under way with IT to produce a mobile application which will allow City Inspectors to issue Fixed Penalty Notices (FPN) on the street to be more effective with their time. The application will allow for all investigation work and production of an FPN to be completed whilst on site.

8.6 We are in the middle of making changes to our data recording for waste to highlight our hot spots for abandoned waste. This will allow us to review hot spots on a regular basis to deploy staff more effectively and look at long term

solutions to the problems within these areas which overlap with elements of ASB. Regular analysis will also allow us to measure and review performance.

- 8.7 Westminster's Waste Enforcement Policy is currently under review. The aim of the review is to bring it in line with recent legislative and national policy updates, and ensure our approach to enforcement is clear, transparent and consistently applied.

9. Summary

- 9.1 The diverse range of locations and causes of fly-tipping will continue to require a number of different approaches to effectively address this long-standing issue. Ensuring that residents and businesses understand what they are supposed to do to correctly dispose of their waste and recycling and the consequences of non-compliance will remain the foundation for reducing fly-tipping. Better use of technology to deploy collection vehicles and enforcement staff to provide a visible deterrent will also be a priority area combined with encouraging residents and businesses to report problems to us in a more timely and effective format.

**If you have any queries about this Report or wish to inspect any of the
Background Papers, please contact Mark Banks x3369
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APPENDICES:

Keep Britain Tidy & LEDNET Fly-tipping in London Report 2018

<https://www.keepbritaintidy.org/sites/default/files/resource/Understanding-and-Tackling-Fly-Tipping-in-London-Final-Report.pdf>

BACKGROUND PAPERS

None
