

CABINET – 18TH SEPTEMBER 2024

SUBJECT: DRAFT WASTE STRATEGY AND FEEDBACK FROM 12-WEEK PUBLIC CONSULTATION

REPORT BY: CORPORATE DIRECTOR-ECONOMY AND ENVIRONMENT

1. PURPOSE OF REPORT

- 1.1. To provide Cabinet with an update on key findings from the 12-week public consultation on the council's draft waste strategy.
- 1.2. Through the consultation findings, offer some initial operational recommendations to help mitigate the public impact of some of the proposals, with additional feedback from the cross-party member working group and Joint Scrutiny Committee on these initial recommendations.
- 1.3. To agree the final draft waste strategy using feedback from the public consultation, member working group and Joint Scrutiny Committee prior to seeking approval from full Council.
- 1.4. To agree the proposed financial commitments associated with the delivery of the Waste Strategy and Outline Business Case (OBC) following the recent response from Welsh Government (WG).

2. SUMMARY

- 2.1 Endorsed by Cabinet in July 2023, the draft waste strategy sets out the strategic direction and longer-term plan to ensure the council meets and exceeds its statutory performance targets, while being realistic about the timescales and resources required to meet these ambitions.
- 2.2. The draft strategy is based on five strategic objectives:
 - Reduce overall waste arisings.
 - Increase repair and reuse.
 - Increase the proportion and quality of material that is recycled.
 - Optimise contribution to and use of renewable energy, and
 - Help our residents to manage waste more sustainably.

- 2.3. The document also explores key areas of data to set out the council's current performance as well as setting out the rationale for a number of proposed interventions and service changes.
- 2.4. It is clear however that the council cannot make the changes alone, and that a collective effort is required. On 17 January 2024 Cabinet endorsed an indepth 12-week consultation period to allow residents and other stakeholder groups the opportunity to help shape the proposals within the final version of the waste strategy.
- 2.5. At that meeting, it was agreed a further report would be presented to Cabinet in summer 2024 once the consultation had been completed and the responses analysed. This report sets out the key findings from the 12-week public consultation on the council's draft waste strategy along with comments received from the Cross-Party Members Working Group and Joint Scrutiny Committee.
- 2.6. Through the consultation findings, this report also offers some initial operational recommendations to help mitigate the public impact of some of the proposals, and it seeks approval of the waste strategy and OBC for agreement with WG.
- 2.7. The financial implications that were outlined in the previous report to Cabinet (Draft Waste Strategy Jan 17, 2024) have been revised. The total capital cost now stands at £54.804m, however, this includes capital costs for replacement of existing vehicles so when this is removed the total capital funding requirement stands at £48.309m. There is also currently a revenue requirement of £1.400m of borrowing to fund the required Caerphilly CBC investment which is structured and taken out on a 25-year 4% annuity loan. Welsh Government have made it clear that they would not be able to provide any revenue support for the project but have offered assurances regarding capital support. Whilst the level of support is yet to be confirmed the assumption has been made that it would be a 60/40 split with Welsh Government providing 60%. On September 6th, 2024, the Deputy First Minister in Welsh Government approved, in principle, the Councils request for £27.559m in funding support. An additional uplift will be provided to aid the Council's transition to ultra-low emission and electric vehicles. Of the £27.559m, £0.952m has been approved for the current financial year (2024/25).
- 2.8. To deliver the changes required, new depot infrastructure is required, and the capital investment therefore includes this as a major element of the capital expenditure. To achieve this a new site will need to be acquired and cabinet is therefore being asked to approve the investment of £4.657m in purchasing an appropriate mid valleys site to develop a new future proofed recycling facility to allow the move to a WG Blueprint waste and recycling collection service.

3. **RECOMMENDATIONS**

- 3.1. Cabinet is asked to consider the key findings from the 12-week public consultation on the council's draft waste strategy and subsequent comments from the cross-party member working group and Joint Scrutiny Committee. This includes some initial operational recommendations described in detail at 5.9 of this report to help mitigate the public impact of some of the proposals.
- 3.2. Cabinet is asked to approve the proposed final draft of the waste strategy and OBC.
- 3.3. Cabinet is asked to note the update on the OBC also outlined in the financial implications section (section 8 of this report) which sets out a total capital requirement of £54.804m and Welsh Government's approval in principle of funding support for £27.559m plus additional funding (amount to be confirmed) to support the Council's transition to ultra-low emission and electric vehicles
- 3.4. Cabinet is asked to endorse a recommendation to Council that the Council's total capital requirement of £24.868m should be funded through borrowing, £0.636m of which would be required in 2024/25.
- 3.5. Prior to Council consideration, Cabinet is also asked to endorse the proposed purchase of the mid valley site that has been identified as the preferred option and the proposal to delegate the negotiation and completion of the acquisition to the Head of Land and Property in consultation with the Corporate Director for Economy & Environment and relevant Cabinet member.
- 3.6. Cabinet is asked to approve that any in year Waste Service revenue underspends are ringfenced to smooth revenue operation variations as the strategy is implemented over the next five years.

4. REASONS FOR THE RECOMMENDATIONS

- 4.1. The draft waste strategy builds upon the previously endorsed Routemap and sets out the strategic direction to reduce waste and exceed Welsh Government statutory recycling targets.
- 4.2. Following a period of public consultation, the views of residents and other stakeholder groups are considered in detail and help shape the final version of the strategy for Cabinet and Council consideration.

5. THE REPORT

5.1. Endorsed by Cabinet in July 2023, the draft waste strategy set out the strategic direction and longer-term plan to ensure the council meets and

exceeds its statutory performance targets, while being realistic about the timescales and resources required to meet these ambitions.

- 5.2. The draft strategy is based on five strategic objectives:
 - Reduce overall waste arisings.
 - Increase repair and reuse.
 - Increase the proportion and quality of material that is recycled.
 - Optimise contribution to and use of renewable energy, and
 - Help our residents to manage waste more sustainably.
- 5.3. The document also explores key areas of data to set out the council's current performance as well as setting out the rationale for a number of proposed interventions and service changes.
- 5.4. It is clear however that the council cannot make the changes alone, and that a collective effort is required. On 17 January 2024 Cabinet endorsed an indepth 12-week consultation period to allow residents and other stakeholder groups the opportunity to help shape the proposals within the final version of the waste strategy.

5.5 **Engagement to inform the draft strategy's development.**

The engagement and support of elected members has been crucial in shaping the draft waste strategy to date. In July 2023, Cabinet agreed to establish a cross-party member working group, to include trade union representatives, which has been instrumental in the development of the draft strategy.

In developing the draft strategy for public consultation, the group of 12 members reviewed several aspects of the strategy, giving a clear steer for each proposal. In addition, officers have worked closely with representatives of the Welsh Government appointed consultant teams (WRAP and Local Partnerships) to undertake thorough modelling of a range of options to inform the draft strategy in readiness for public consultation.

A Joint Scrutiny Committee was also held on 15 January 2024 for members to offer their views prior to Cabinet consideration of the draft strategy on 17 January 2024.

5.6 **The consultation process**

The 12-week consultation ran from Monday 5 February 2024 until Tuesday 30 April 2024.

Residents were invited to give their views in a variety of ways, including:

• A survey, which was available on the council's website, with hard copies also available from all county borough libraries. Hard copies could be returned via libraries or through the post.

- A dedicated edition of Newsline, delivered to each household within Caerphilly County Borough also featured a hard copy version of the proposals and associated consultation materials.
- A total of 16 informal face-to-face drop-in sessions were arranged at libraries and other community venues across the county borough. A further four online drop-in sessions were held, and extensive promotion of these sessions was supported by colleagues from the communications team. As far as possible, these sessions were held on different days of the week and different times of the day, including evenings and weekends, to enable as many people as possible to attend.
- In addition to the advertised sessions, 'pop up' opportunities for residents to offer their views were held at supermarket foyers and other locations across the county borough, with attendance also at the council's programme of town centre spring events.
- A dedicated meeting of the Viewpoint Panel, which is a group of residents who are regularly invited to get involved in the council's consultation activities. Anyone who is a resident can join.
- Online engagement opportunities through the council's digital engagement platform, Engagement HQ.
- Extensive targeted engagement with stakeholders, waste and recycling council staff and seldom heard groups. Identification of these was supported through the development of the integrated impact assessment for the draft proposals.
- Further engagement as identified in discussion with local elected members.

A full breakdown of each engagement session held, the date and location, the approximate number of attendees and an overview of feedback can be found at:

Link to Draft Waste and Recycling Strategy 2023 - 2028

In presenting the feedback from the 12-week consultation, the quantitative data from the survey is outlined over the following paragraphs. Also, key for consideration is an overview of the main themes arising from the qualitative, conversation-based elements of the public consultation.

5.7 **Data collated through the survey.**

The total number of responses received through the survey was **2,816**. The statistical data (percentages) presented within this key data survey report relates to survey responses and not the qualitative feedback from conversations. Participation in the consultation was self-selecting and the data should be considered within this context.

Views on the strategic objectives:

This question within the survey sought to gauge views on whether residents agreed or disagreed with the overarching strategic aims of the draft waste

strategy. The question asked whether people agreed, disagreed, or didn't know.

Table 1 – Priority Areas



While ranging between 81% agreeing with reducing waste arising as an objective, and 90% agreeing that increased repair/reuse is a key objective, the consultation responses confirm there is clear support overall for the strategic direction of the draft waste strategy.

Views on proposal to separate dry recycling.

- 95% of respondents state they currently recycle (dry recycling).
- 79% of respondents also currently use the food waste recycling service.
- 24% respondents felt that the proposal to introduce separated dry waste recycling will help us meet statutory recycling targets. 61% disagreed and 15% didn't know.
- 42% of respondents felt the proposal to introduce separated dry recycling would either have a positive or neutral impact on them/their households (14% and 28% respectively). 57% felt it would have a negative impact upon them.

Views on proposals to reduce the frequency of garden waste collection from weekly to fortnightly and only collect from March to end of October:

- 67% of respondents state they currently use the weekly garden waste collection service.
- Just under half of respondents (47% for seasonal waste and 49% for fortnightly waste) agreed that the proposals will help achieve statutory recycling targets.
- 64% felt that these proposals would have a positive or neutral impact on their household, with 34% stating the proposals would have a negative impact on them/their household.

<u>Views on proposal to reduce the frequency of refuse (residual waste) bin</u> <u>collections:</u>

- 83% of respondents selected 3 weekly collections as their preferred option with the remaining 17% selecting 4 weekly collections.
- 21% felt that the changes to the frequency of general waste collection would help us meet statutory recycling targets, with 20% stating they didn't know. The remaining 59% felt the changes would not help meet the statutory recycling targets.
- 40% of respondents felt that changes to the frequency of general waste collection would have a positive or neutral impact on them/their households (8% and 32% respectively), while 60% felt the proposal would have a negative impact on them/their household.

<u>Views on proposed expansion of absorbent hygiene product collection</u> <u>service:</u>

- 46% of respondents felt that this proposal would help meet statutory recycling targets, with a further 44% saying they didn't know.
- This is reflective of a lower level of usage of the service, with 74% indicating that it would have a neutral impact on them.
- A further 150 respondents did not answer this question.

<u>Views on proposal to review the current provision of Household Recycling</u> <u>Centre (HRC) sites:</u>

- 88% of respondents had used HRC sites in the last 12 months.
- Of those who indicated that they had used a HRC site in the last 12 months, just under half (47%) had visited less than 6 times. 34% had visited 6-10 times and 19% had visited more than 10 times.
- Among respondents, Trehir was the most visited site and Rhymney the least visited site.
- 8% of respondents felt that this proposal would have a positive impact on statutory recycling targets whilst 72% disagreed.
- 36% felt that this proposal would have a positive or neutral impact on them with 64% feeling that this would have a negative impact on them (albeit depending on which site/s may close).

A full breakdown of the survey results is available at:

Link to Draft Waste and Recycling Strategy 2023 - 2028

5.8 **Qualitative/conversational insight gained through the consultation process.**

While the survey responses offer a clear, statistical indication of respondents' views on the proposals, the value of qualitative, conversational insight gained through the other engagement methods (e.g. face to face engagement, dropin sessions, targeted stakeholder engagement etc) should not be underestimated.

It is through these conversations and qualitative insight gathering, largely with residents, where potential impact and possible mitigation of impact for the proposals has come to the fore.

As stated above, throughout the consultation period, a total of 16 informal face-to-face drop-in sessions were arranged at libraries and other community venues across the county borough. A further four online drop-in sessions were held, and extensive promotion of these sessions was supported by colleagues from the communications team. As far as possible, these sessions were held on different days of the week and different times of the day, including evenings and weekends, to enable as many people as possible to attend.

In addition to the advertised sessions, 'pop up' opportunities for residents to offer their views were held at supermarket foyers and other locations across the county borough, with attendance also at the council's programme of town centre spring events.

Extensive targeted engagement with stakeholders, waste and recycling council staff and seldom heard groups was also undertaken, including with local community organisations supporting those residents with protected characteristics.

Parent and child classes, carer support groups, knit and natter groups, youth clubs, Caerphilly People First, coffee mornings and community partnership meetings are just some of the further targeted engagement sessions attended by officers during the consultation period.

A full overview of qualitative feedback received through the consultation is available at Appendix One, with further detail at <u>Draft Waste and Recycling</u> <u>Strategy Consultation | The Caerphilly Conversation.</u> A summary of key themes is presented over the following paragraphs.

Qualitative feedback on the strategic objectives:

There was overall strong support for the strategic objectives, with many agreeing that things need to change to help meet the ambitious targets. It was often felt that more clarity is needed on how the strategic objectives would be achieved.

It was frequently suggested that waste and recycling collection needs to be as easy as possible to encourage participation, with a focus on those who do not currently recycle (including introducing fines for non-compliance) rather than penalising those who already participate fully.

Some felt the proposals are more about saving money than improving recycling rates, while others felt the responsibility for achieving these targets lies with others – this was more strongly the view in relation to renewable energy.

Many respondents felt that more information/education is needed for residents to understand what can be recycled and why recycling is so important, with many commenting that the council should expand what is collected at the kerbside, in particular, soft plastics.

Some suggestions were made that how the council deals with waste outside the home should become an additional strategic objective. Litter, fly-tipping and street cleanliness was frequently raised, with pleas to consider the impact of any changes on the appearance of streets and neighbourhoods.

Overall, there was general strong support for the strategic objectives outlined within the consultation document.

Qualitative feedback on proposal to separate dry recycling.

Perhaps unsurprisingly, the feedback on this proposal was mixed. Many respondents were firm in their views that they would do what was required of them, regardless of what system for recycling was put in place. Many didn't feel strongly about the proposal either way, with some saying they've seen the separating of recycling taking place for some time in other boroughs, and they felt it was only a matter of time before Caerphilly residents must do the same.

Some also felt that the separation of recycling will help residents better understand what can be recycled, and that separation is already being done in the workplace now due to changes in legislation, so residents should better understand how to do this already.

Where concerns were raised about the proposal, many felt that a more complicated system will require more effort, and therefore lead to lower participation. A common statement was 'if some people don't recycle now while it all goes in one bin, why do we think they'll start recycling when it requires more effort?'. Others saw separation as the role of the council, not residents. Lack of space/storage for additional receptacles was a primary concern throughout discussions, particularly among those living in terraced properties and flats. Concerns were also raised about the new receptacles themselves, with the need for them to be 'animal proof' and 'weatherproof'. The weight of the receptacles was raised as a concern, particularly among older people and those with disabilities, due to not being able to lift the new receptacles. It was asked that for this reason, and for those with steps outside their property, that a wheeled receptacle is provided.

A popular suggestion was to somehow use the existing brown bin for storage of separated waste (positive of it having wheels and meeting the weatherproof/animal proof criteria).

Qualitative feedback on proposals to reduce the frequency of garden waste collection from weekly to fortnightly and only collect from March to end of October:

Many residents felt a reduced frequency would be adequate, often stating that their use of the garden waste collection service is far lower in the winter months. Where people stated they didn't use the garden waste collection service, it was often due to home composting. There were positive suggestions that these proposals may encourage this on a larger scale, perhaps in collaboration with local allotment groups.

Where concerns were identified, many related to the need to lift the 4-bag restriction if collection frequencies reduced, and that less frequent collections could result in unpleasant odours and heavier bags, making them more difficult for some residents to lift.

While many respondents felt seasonal collection would be adequate, many noted that due to climate change, their gardening season now extends more into the autumn months. Autumnal leaf fall and not being able to cut back trees and hedges during nesting season was highlighted as reasons for suggesting an extension of the collection service into November.

Others felt that a year around collection would still be needed – or suggested e.g. an additional one-off collection of Christmas trees or a request service in winter months, while some raised concerns of an impact on street cleanliness with overfilled bags being left out for longer periods of time.

Qualitative feedback on proposal to reduce the frequency of refuse (residual waste) bin collections:

Unsurprisingly, the feedback on this proposal was again mixed. Many respondents, particularly those in smaller households did not perceive a negative impact. Some also felt that 4 weekly collections would be preferable over 3 weekly as it could become confusing in remembering the collection cycle. Some who supported a reduction in frequency also felt it may

encourage others who currently don't recycle adequately, particularly with food waste, to start.

Conversely, many others, particularly those with larger families stated they already have a general waste bin at full capacity after a fortnight, despite the fact they recycle all they can already.

Concerns were also raised relating to smelly, unhygienic bins, particularly those with animals or children in nappies, and the weight of bins after 3 or 4 weeks, with more reliance being placed on assisted collection services as a result. Some also felt this proposal would adversely affect people who are unable to access Household Recycling Centres (HRCs) to take any surplus residual waste to these sites between collections.

The impact on street cleanliness was again raised as a potential risk, as well as contamination in recycling bins, if overflowing residual waste was placed in with recycling. The need for the council to ensure there are no missed collections should the frequency change was also highlighted regularly, as this could make the situation unmanageable.

Qualitative feedback on proposed expansion of absorbent hygiene product (AHP) collection service:

As with the results within the survey, the views and opinions on this proposal were fewer in number than the others, largely due to a relatively low awareness or use of any current AHP collection service.

Many felt this service is a very positive one and could be particularly useful should the frequency of residual waste collections reduce to free-up capacity in bins, as nappies and other absorbent hygiene products can be bulky. The hygiene aspect of having regular, separate collections for this type of waste was frequently highlighted as a positive.

Some noted that any positive impact on them would depend on the eligibility for the service – and that this needs to be widened and clearly defined. Expansion to those with one child in nappies would be very welcomed.

Where concerns were raised, several respondents commented there needs to be sensitivity around how this service is delivered. Bags 'promoting' you use this service could cause embarrassment and raise awareness of a household's vulnerability to others.

Through discussions particularly with carers groups, it was suggested that paid carers need to be provided with information to help them understand what goes in which bin as it is not always the recipient of the service who disposes of waste. Qualitative feedback on proposal to review the current provision of Household Recycling Centre (HRC) sites:

Through discussions, many residents felt it would depend on which site/s closed, with it also being acknowledged that some sites are positioned in relatively close proximity at the moment. Many felt extended opening hours would be a positive move, and less confusing if all were open full time.

The need to travel further/concerns about increased fuel use on the environment, concerns about an increase in fly-tipping and increased queue times/number of visitors at each site (particularly if residual waste collection frequencies reduced) were highlighted as particular areas of concern with the proposal.

In mitigating against the impact of this proposal, residents offered a range of suggestions including keeping all the sites open and make them easy to access. Others said they'd rather a further reduction in opening days/times at their local HRC rather than see it close entirely, and the council are also encouraged to increase what can be recycled at HRCs.

For those unable to drive, or for those residents with vehicles not accepted at the HRCs, it was felt by some that the council should also consider mobile HRC facilities on a cyclical basis to allow as many people as possible to use the facilities.

5.9 **Operational level recommendations**

While not exhaustive, the feedback within the preceding paragraphs highlights the key themes arising through the 12-week public consultation.

Using this insight, some operational level recommendations/potential mitigations against the proposals include:

- Introducing a sixth strategic objective how waste outside the home is dealt with - which would include street cleanliness.
- If the separation of recycling proposal is pursued, consideration is given to storage implications, the need for the receptacles to be animal and weatherproof and suitable for people who may not be able to lift heavy items.
- If the frequency of garden waste collections reduced, consideration is given to extending the proposal further into the year for example, until the end of November rather than the end of October currently proposed. Also lift the 4-bag restriction that can be placed out for collection.
- Larger families need to be considered, with the proposed changes to the frequency of residual waste collections. Some households, who recycle as much as they can, are already at capacity with their residual waste bins after a fortnight.
- If AHP collections are expanded, a comprehensive communications campaign is required alongside clear eligibility criteria to encourage

participation in the scheme. The scheme should also be promoted sensitively and carried out discreetly.

• If changes to household recycling centres are considered, for some, reducing the opening hours/days would be preferable over complete closure.

5.10 **Overarching themes**

In considering the feedback within this and the full consultation report, officers and members are also asked to note the following overarching themes:

- Access to waste and recycling services should be as easy as possible for residents.
- Education is key to encouraging and improving recycling rates.
- One approach will not suit all resident groups consideration needs to be given to those who are older/disabled/do not have the capacity to understand. These residents need to be supported to ensure that they are able to participate more effectively or are not penalised for non-participation as a result of their specific difficulties. Similarly with larger families, those in smaller properties etc.

5.11 Infrastructure

In selecting the preferred solution there has been consideration of a number of options and associated infrastructure requirements. The Waste and Resource Action Programme (WRAP) and their appointed consultants SLR conducted extensive and comprehensive analysis of various recycling service options outlined below and modelled them against the baseline.

Scenario	Description		
Option 1a	(KSS) WG Blueprint Kerbside Sort		
	with weekly Garden waste		
Option 1b	(KSS) WG Blueprint Kerbside Sort		
	with fortnightly Garden waste		
Option 2	Three-stream, One Pass		
	Retaining food and garden collections on a separate vehicle		
Option 3a	Three-stream, Twin Pass		
	with weekly Garden waste		
Option 3b	Three-stream, Twin Pass		
	with fortnightly Garden waste		

Table 1: Options Modelled

Each of the above options were also modelled against changes in residual waste frequencies (3 and 4 weekly). Modelling these frequencies has considered the proven benefits of frequency changes, but also the decreasing levels of residual waste sent to Energy from Waste (EfW) facilities. Whilst no EfW levels have been set beyond 2025, this project has taken a long-term view to decreasing residual waste levels as much as reasonably and practicably possible.

After a thorough evaluation, the recommended option is Option 1B with the construction of a new depot and transfer station in conjunction with the introduction of the blueprint recycling service, utilising Resource Recovery Vehicles (RRV's), with separate fortnightly garden waste collections with considerations given to collections being seasonal.

Significantly, the modelling also highlighted the need for a new transfer station and depot infrastructure for all options other than the baseline. This is because the current waste transfer station located at Full Moon, Cross Keys has insufficient developmental capacity to enable any sorting or bulking of source segregated recyclate. Additionally, the current depot at Tir-y-Berth does not have capacity for the significant number of additional vehicles that would be required with any of the options other than the baseline (table 1).

Development of the current waste transfer station at Full Moon and a Brownfield Site adjacent to Trehir HRC were considered during the modelling. These are assets and land already in Caerphilly's ownership, and therefore provided a logical basis to begin. However, the modelling ruled out Full Moon due to its footprint and lack of development land available at the site. In terms of the Trehir site, more brownfield land would need to be acquired adjacent to the Trehir site. From further consideration the topography of the adjoining land at Trehir proved problematic along with significant development costs. Consequently, a mid-valley location was modelled, and the outputs identified shorter travel times and fewer vehicles required. To further substantiate this conclusion further in-depth analysis has been undertaken on options 2 and 3 (twin pass options) which are included within the OBC. This review clearly discounts these options based on several factors including value for money, logistics, reduced performance and less favourable from a decarbonisation perspective.

Given the logistical benefits, a mid valley location was the preferred option as outlined by WRAP/SLR as part of the modelling work. The preferred site was broadly based upon the new facility at Vale of Glamorgan with a comparable and favourable footprint to take this forward. However, the availability of suitable land to develop a new recycling facility /depot has been challenging. The Council has considered several locations as part of this project including sites at Penallta Industrial Estate, Penmaen Industrial Estate, Trehir, Cross Keys, Pantglas Industrial Estate, Bedwas, Pontllanfraith, Oakdale Business Park, Nelson, Rhymney, and Dyffryn Industrial Estate. Unfortunately, most of the initial options were discounted due to the lack of capacity to develop the facility, cost, and the urgency of a decision to purchase the site to allow an appropriate lead time for development.

A preferred mid valley site has now been identified and the Council has negotiated a price for purchase. However, whilst the current landowner has agreed to reserve the site, they have indicated that they would need a final commitment to purchase from the Council during October 2024. If this is not received, they have advised that they will pursue other options as there is interest in the site from other parties. However, the costs relating to the development of a new recycling facility has increased since the Initial Strategic Project Assessment was prepared.

It was initially anticipated that the current site and building could be refurbished to allow for the required recycling facility but there are significant limitations relating to the height of the building and number of supporting columns within the building. There are also concerns about the current entry/exit points to the facility which would not allow for a one-way system as well as the location of the required fuel pumps and other associated depot infrastructure. In its current format, the site would not allow for any future proofing. Therefore, the preferred options and financial implications have been based on the acquisition of the site and buildings, demolition, and construction of a new 'fit for purpose' facility on the footprint of the existing site which has increased the proposed development costs. The proposed site layout plan is included below in Figure 1.

Figure 1: CCBC Proposed RTS



The above option is the proposed blueprint compliant facility. The costs for the development of the facility are outlined in paragraph 8.7.

6. ASSUMPTIONS

6.1 While the assumptions made in the prior report to Cabinet (Draft Waste Strategy – 17 January 2024) remain relevant, there is a further assumption of a funding split of 60/40 with Welsh Government providing 60%. This intervention ratio has been used previously when Welsh Government has provided capital funding to other authorities to support changes being made to their waste services and resultant infrastructure. On September 6th, 2024, the Deputy First Minister in Welsh Government approved, in principle, the Councils request for £27.559m in funding support. An additional uplift will be provided to aid the Council's transition to ultra-low emission and electric vehicles. Of the £2.559m, £0.952m has been approved for the current financial year (2024/25).

7. SUMMARY OF INTEGRATED IMPACT ASSESSMENT

- 7.1. Unsustainable consumption of precious resources and waste disposal has a significant impact on the environment and cannot be decoupled from its impact on our climate. It is important steps are taken to move away from the inefficient linear economy (where resources are taken, made into products, used, and finally thrown away) and transition to a more circular economy. In a circular economy, precious resources are kept in use for longer, maximising material quality and offering social and economic opportunities.
- 7.2. The draft waste strategy builds upon the previously approved Routemap and sets out the strategic direction to reduce waste and exceed Welsh Government statutory recycling targets. The council is at risk of circa £2.713m per annum fines (at current performance levels) for not achieving statutory recycling targets; the Minister previously took the decision not to fine the council subject to a root and branch review and supplementary actions being implemented to meet future targets.
- 7.3. The draft waste strategy sets out how Caerphilly will minimise the negative impacts of waste on the environment by reducing waste, ensuring items are used again, recycled for further manufacturing, or sent for recovery. It builds upon the short- term interventions agreed as part of the Routemap and provides evidence to the Minister of Caerphilly's commitment to make change.
- 7.4. The link to the full Integrated Impact Assessments for the draft waste strategy can be found here:

iia-form-contamination and iia form/kerbside-organic.

The document will be further refined in light of feedback through the public consultation and subsequent further input from the cross-party member working group.

8. FINANCIAL IMPLICATIONS

- 8.1. The financial implications associated with the delivery of the waste strategy are significant and were outlined in the previous report to Cabinet (Draft Waste Strategy 17 January 2024) Following the preparation and submission of an Initial Strategic Project Assessment, Officers prepared and submitted to Welsh Government an Outline Business Case (OBC) which has now been approved.
- 8.2 In the previous report to Cabinet (Draft Waste Strategy 17 January 2024) initial revenue and capital costs estimates were provided. These have been further revised and the summary Capital and Revenue position is shown below in Table 2, a detailed breakdown can be found in Appendix 2:

Strategy	2023/24 Year 0	2024/25 Year 1	2025/26 Year 2	2026/27 Year 3	2027/28 Year 4	2028/29 Year 5	2029/30 Year 6	Total
	£m	£m						
Total Revenue Cost	9.317	10.520	10.031	11.184	11.261	12.649	12.840	77.802
Total Revenue Funding	-9.317	-10.520	-10.031	-9.784	-9.861	-10.058	-10.259	-69.831
Revenue Gap	0.000	0.000	0.000	1.400	1.400	2.591	2.581	7.971
Total Capital Cost	0.000	1.588	25.138	24.776	3.301	0.000	0.000	54.804
Total Capital Funding	0.000	0.000	0.000	-8.872	0.000	0.000	0.000	-8.872
Capital Gap	0.000	1.588	25.138	15.904	3.301	0.000	0.000	45.932

Table 2 – Revised Revenue and Capital Costs

- 8.3 These costs are current best estimates but remain indicative at this stage and subject to change. Final costs will depend on a range of factors including the final decision made on kerbside collection service changes, manufacturers and contractors selected, final site designs, and inflationary pressures. Prices have been indexed to allow for 2% inflation, site acquisition and development costs are based on a QS report in 2026 prices and includes indexation of 5.9%.
- 8.4 The most significant change from what was previously presented to Cabinet is in relation to the infrastructure required to deliver the blueprint compliant collection service. An appropriate mid valleys site has been identified and negotiations are ongoing should members decide to progress with the proposals identified within this report.
- 8.5 The costs relating to the development of the recycling facility have increased. It was anticipated that the current site and building could be refurbished to allow for the required recycling facility but there are significant limitations largely around the height of the building and number of supporting columns within the building. There are also concerns about the current entry/exit points to the facility which would not allow for a one-way system as well as the

location of the required fuel pumps and garage. In its current format, the site would not allow for any future proofing. Therefore, consideration has been given to the construction of a new 'fit for purpose' site on the footprint of the existing site.

8.6 Operational revenue costs show an overall cost neutral position - this has been achieved by identifying additional savings from the blueprint WRAP modelling (which included materials sales and material processing cost savings) including fuel savings from zoning collection rounds, HRC rationalisation and not requiring a secondary sort at HRCs. In addition, a different approach has been taken to CCBC vehicle replacement funding strategy. Future core capital budgets will need to be committed to vehicle replacement in addition to a revenue sinking fund, it assumes Cabinet approves Waste service underspends can be ringfenced for this purpose to smooth the variations as the strategy is implemented over the next five years. All prices include assumptions on inflation. It should be acknowledged that this is high-level financial modelling undertaken for outline business case and contains many assumptions and estimates at this stage, there is therefore risk around this position, and it is subject to change.

The gap in revenue is driven by two items, the revenue cost of borrowing for Caerphilly based on a 60% WG /40% CCBC funding split and assumed policy changes in relation to the Emissions Trading Scheme to include waste incineration and energy from waste (EfW) facilities from 2028.

The increase for borrowing would be a budget setting growth item of £1.4m. A revenue budget increase would be required if we do nothing to pay for the fines that could be levied for not hitting the 70% recycling target. Under the option 'do nothing with 3 weekly residual collections' recycling is projected to increase so the fines would reduce however we would still not hit the 70% recycling target and there is the potential that Welsh Government could look to increase the target and fine in the future. Modelling has assumed that interest rates will reduce from current levels and that debt is structured and taken out on a 25-year 4% annuity loan after contribution from core capital budgets, this would equate to borrowing costs which are broadly in line with the current forecast fines.

Assumed ETS Policy changes have been included for the purposes of modelling from 2028 and would be on average £1.2m, these would need to be addressed through the budget process when they are approved. This increase would be required regardless of the option taken forward, the amount would be determined by the tonnages going through EfW facilities.

8.7 Welsh Government provided assurances that there would be capital funding available to support us on the journey. The total capital cost to implement the strategy is forecast at £54.804m. However, this includes the cost of vehicle replacement, only the incremental costs of implementing the strategy can be included in the bid so the capital cost for replacing existing vehicles under current operations of £6.495m has been deducted from the capital request to Welsh Government. In addition, Welsh Government have previously provided

funding to local authorities to the value of 80% of the cost difference between diesel and electric vehicles so an assumption has also been made that this level of commitment will be provided. In this regard £2.377m has been assumed as grant contribution for this element.

- 8.8 Therefore, the Capital request to Welsh Government to implement the strategy stands at £45.932m. Based on a 60% capital contribution from Welsh Government of £27.559m plus £2.377m for electric vehicles the remaining 40% of £18.373m and the existing operational vehicle replacement cost of £6.495m would need to be funded by the Council. The Council does not have sufficient uncommitted reserves to fund this so would either need to reprioritise existing commitments or undertake borrowing. The revenue cost of borrowing based on an annuity loan at 4% and after accounting for existing vehicle replacement revenue budgets would be £1.4m per year. For comparison the fines for not achieving recycling targets are forecast at £2.713m up to 2023/24 and forecast to be £1.337m per year thereafter, based on current performance against the 70% target.
- 8.9 Engagement with Welsh Government is ongoing and therefore critical to secure maximum capital contribution. Officers met with Welsh Government on July 1st and indications were supportive but Ministerial support would be required once WG officers have satisfied themselves in regard the OBC submission. On September 6th, 2024, the Deputy First Minister in Welsh Government approved, in principle, the Councils request for £27.559m in funding support. An additional uplift will be provided to aid the Council's transition to ultra-low emission and electric vehicles. Of the £27.559m, £0.952m has been approved for the current financial year (2024/25), the Council would need to match this with £0.636m.

9. PERSONNEL IMPLICATIONS

- 9.1. The proposals in the waste strategy to increase recycling performance would result in changes to the waste service and working practices. None of the changes will result in a reduced number of staff within the service but will require a significant increase in staffing.
- 9.2 The workforce has a key role to play in making the step changes required and they have been engaged in the development of the draft strategy and this will continue through to implementation. A workforce working group has been established and consists of representatives from the various functions across the waste service as well as Trade union representatives and officers from HR, Health and Safety and Transformation.
- 9.3 The scale of changes within the previously agreed route map and the draft waste strategy are wide ranging and support will be required from across the Council to deliver the changes. The programme of projects detailed within the report will be managed and delivered through a robust project management process which involves all key service areas across the council. There are currently 9 officer working groups looking at various elements of the strategy

which include representatives from Waste, Communications, Procurement, IT, Customer Services, HR, Health & Safety, Transformation, Property, and Infrastructure.

10. CONSULTATIONS

- 10.1. Public consultation has been central in the development of this report, in line with the Gunning principles. The doctrine of legitimate expectation (common law) also applies:
 - when there has been a clear promise of consultation
 - where official guidance or policies imply a promise to act in a particular way
 - where there is a proposed withdrawal of a benefit with significant impacts to be considered
 - where the nature of the relationship would create unfairness if there to be inadequate consultation

A full overview of the feedback from the 12-week consultation can be found at Appendix One and at the following links:

Link to Draft Waste and Recycling Strategy 2023 - 2028

Link to Draft Waste and Recycling Strategy Consultation

10.2. The engagement and support of elected members has been crucial in shaping the draft waste strategy to date. In July 2023, Cabinet agreed to establish a cross-party member working group, to include trade union representatives, which has been instrumental in the development of the draft strategy.

In developing the draft strategy for public consultation, the group of 12 members reviewed several aspects of the strategy, giving a clear steer for each proposal. In addition, officers have worked closely with representatives from WRAP and Local Partnerships to undertake thorough modelling of a range of options to inform the draft strategy in readiness for public consultation.

- 10.3. A further meeting of the cross-party members working group was held on 11 June 2024 to give consideration to feedback from the consultation and to consider any recommendations that the group wish to make in presenting an updated final draft waste strategy for consideration in July 2024. The feedback from this working group session is summarised below.
- 10.4. Comments from cross-party working group 11 June 2024:

Recycling system and Targets

Dry recycling - A member felt that the more complicated a recycling system is, the less likely people are to participate as it is more time consuming. Education and fine will be needed to ensure that it works as we have no choice due to Welsh Government.

The group were informed that the top performers in Wales are at 70% recycling and are on Blueprint. It is important to have clear messaging and understanding and to act immediately to provide feedback to residents.

Food waste figure at 79% in the consultation doesn't match the actual participation of 50%, so it is misleading. In clarifying, the 79% participation figure was from respondents to the survey, not the community as a whole.

A member highlighted that Wales is currently second in the world for recycling and we need to continue.

A member sought clarification of the extra cost to introduce sorted recycling compared to the additional recycling that will be collected. It was suggested that with the increase in food waste collection and penalties for contamination that we may get closer to target without having to introduce sorted dry recycling collections. It was explained that we are now at 60% and modelling shows we can get to 70% but at a significant cost. However, we will save Gate Fees (which we pay for sorting at present), and we could also make money by selling better quality sorted materials.

Recycling targets are made up of all recycling, because we have the highest volume of residual waste the percentage of recycling needed is higher. Therefore, reducing residual waste will have a significant impact on targets for recycling. It was also noted that Welsh Government will take into consideration if we are moving towards Blueprint when considering our recycling percentage performance. The previous strategy included the current method of co-mingling of recycling, this was not acceptable to WG and put us at risk of fines due to not achieving the required recycling performance.

The proposals in England were highlighted to be legislating for co-mingling of dry recycling. It was explained that England currently recycles only about 40% of waste and does not have a national requirement on recycling and individual authorities decide themselves what method they will use. It was suggested that Wales needs to compare its recycling record with English Authorities that currently sort recycling and not for England as a whole. It was pointed out to members that Caerphilly along with other Welsh authority's need to adhere to the WG legislation and that targets have now been raised from 64% to 70% for 2024/25.

A member stated that it is important to recycle materials such as aluminium and believes in a circular economy.

Assisted Collections

A member stated that it would be difficult for older and disabled people to use a number of containers. Data is needed on how many will need support and how much it will cost.

Collection Method

A member stated that change can become normalised and suggested a trolley system with boxes. Members were advised that the costing for collection of dry recycling is for bags and boxes, trolley systems are not included but the cost is £36 per unit, it was suggested this could be offered for some people who need assistance. The collection cost is also an issue as it takes longer to collect with trolleys.

A member stated that change is always resisted but knows people in other local authorities that have changed, and they are now used to the system, the member raised concerns about the bags used as they can blow away and make the streets very untidy. It was suggested that we look at other areas to see what works best. It was highlighted to members that weighted bags could be provided which significantly reduces the risk of bags blowing around. Also, the return of the bags/boxes could be undertaken in a manner to reduce this likelihood.

It was stated that there are already complaints about the brown bins which are left on pavements, blocking them for disabled persons.

A member agreed that we need containers that are animal and weatherproof, they also need to be accessible for older disabled persons.

It was suggested that the existing brown bins could be re-purposed for Cardboard of garden waste. It was explained that the side collection vehicles do not have lifts so it would not be suitable for cardboard but an option to use them for garden waste could be looked at as they are currently collected separately with food waste, and this could be reviewed for future service delivery.

Members asked to see example of the proposed bags and boxes and it was agreed that photographs will be circulated to the group and made available for joint scrutiny meeting. It was also suggested that feedback from other areas on the system they use both what has and what hasn't worked.

AHP collections

A member queried how the hygiene waste would be disposed of, will it be an incinerator and how will that help achieve targets. It was explained that this waste could be sent to an incinerator but there are also specialist companies that will recycle this waste, but it is very expensive.

Members felt that a separate system for collection that is sensitive would be preferable.

Residual Waste

A member highlighted that she already uses a very small container for residual waste, and it work well. Members then confirmed that the 3 weekly option was their preference although one member did support 4 weekly collections.

Household Recycling Centres

This was discussed and members advised that they considered previously and supported rationalisation of the current network.

The consensus of the group on the following points was sought:

- Dry recycling different container options to be available to allow for needs of disabled/older residents.
- 4 bag limit for garden waste agree that it may not be enough and agree with fortnightly/seasonal collections and end in November.
- Residual waste 3 weekly collections.
- AHP separate collection but sensitive and discreet.
- HRC's we have already agreed to consider reducing the number.
- Further meeting to discuss sixth strategic objective waste outside the home as this can be covered outside of the main strategy.

The group supported the points listed with 7 for and 1 abstention.

10.5 Comments from Joint Scrutiny Committee 8 July 2024

Kerbside Dry Waste Recycling

Concerns were expressed that the containers for separating dry recyclables will be difficult for some residents to manage, particularly those that live in terraced properties, properties with steps are a particular problem and clarification was sought on the types of containers that will be provided.

Members were advised that proposals to provide a mixture of boxes and bags, a box for glass and a box for paper, and a bag for plastic and cans and another bag for cardboard.

The scrutiny committee suggested re-using the existing brown bins which are already paid for. The committee was advised that the new kerbside collection vehicles do not have lifts and are side loading. Crews would have to stretch into the bins to retrieve bags which would increase the time required and would also represent an unacceptable health and safety risk. It might however be possible to use them for garden waste which is planned to be collected on a separate vehicle which could be fitted with a bin lift. Members asked what consultation has been done with staff on the potential changes to the new collection system, as some of the containers may be heavy to lift. The committee was advised that a health and safety assessment would be carried out when the new system of collection is agreed, however, the boxes are limited in size to ensure the weight is reasonable and the authority has done and will continue to engage with Trade Unions and the workforce via the established working groups.

The stackable trolley boxes used by other local authorities was discussed and it was suggested this might be an option that could be considered for those who need assistance. A member highlighted the trolley boxes used in a neighbouring local authority and stated that these can be problematic with plastics overflowing, boxes falling out when taken down steps and difficulty obtaining replacement trolleys due to costs.

The capacity of the proposed new containers was highlighted when compared to the existing brown bins which is much more, and the committee were assured that additional boxes and bags could be provided where required. However, members felt that this would only mean additional containers to be transported by residents and placed on the street for collection.

Members highlighted the issue of brown bins left on the streets throughout the week and this results in a variety of waste being disposed of by passers-by, the option of lockable containers was suggested as a mean of preventing this and the committee was advised that this would need to be checked to see if it is an option.

A member asked if we could continue to use brown bins because of the impact on quality of recycling since enforcement on contamination has been introduced, or are we being driven to separate the recyclables as they are collected by WG in accordance with its Blueprint. The committee was advised that if co-mingling were to continue there would be no income benefit from selling recycled waste, which would be available if it was separated, and the recycling performance targets were unlikely to be achieved.

A member asked how we enforce the recycling at present and was assured that since the changes on enforcement were introduced, recycling bins that are contaminated are issued with stickers and this is followed by visits to homes and can result in fines. In January, there were 890 contaminated bins in one week and this has now reduced significantly with numbers in the 400's.

Assisted Collections

Members felt that older persons or those with disabilities would find it difficult to carry several containers and asked if an evaluation of the impact has been carried out. It was also suggested that this may require additional resource to support increased requests for assisted collections.

The committee was advised that the authority already provides assisted collections with each request being assessed during a visit to the resident (a

needs-based assessment). It is not suggested that this will change following the introduction of new models of collection.

Rear Lanes

Members questioned why all waste isn't collected via rear lanes and were advised that some 20 years ago a Health and Safety report had been produced on rear lane collections in the county borough and in some cases rear lane collection ceased completely. This was because lanes are very narrow, drivers have limited visibility for pedestrians etc. The HSE allowed it to continue in other lanes but on the proviso that the number of collections did not increase, thereby increasing the risk. The authority was therefore not able to collect recycling or food/garden waste from rear lanes.

Household Recycling Centres

Concerns were expressed regarding the recent changes at HRC's requiring separation of recycling, and it was suggested that this has led to increased fly tipping. It was also suggested that people are also using roadside bins to dispose of waste. Therefore, if a HRC is closed there is a perception that this would increase even further and before any closures are considered a full assessment needs to be undertaken which considers the geography of the location of the HRC as well as the socio-economic factors in the local area.

The committee was informed that initial indicators are that the changes at HRC sites has not resulted in increased fly tipping, there was already instances of waste disposal in roadside bins before the changes and indications are that this waste came from businesses. Assurances were provided that no immediate decisions on the HRC site at Rhymney will be made until the A469 road is fully operational.

A member highlighted that the reason for the lower tonnage at Rhymney and Penmaen, is because they cannot receive the full range of recycling. The committee were advised that the reason that the range of options for recycling waste at these sites is limited is due to the size of the site. The sites have been optimised as much as possible, there have also been problems at Rhymney with the cardboard container being set alight. The members queried the separating of carpets and mattresses from residual waste containers and was advised that this has been done while we look to setup a means to recycle them.

A member queried paperless billing impact on identification at HRC's and was advised there are other methods such as driving licences as a proof of address.

Hygiene Waste Disposal

Members agreed that any proposals for hygiene waste collection would need to be done sensitively and would need to consider equalities and human rights legislation. The committee discussed the types of containers to be used for the hygiene waste and were advised that many local authorities use the purple bags that are collected weekly. Members felt that they need somewhere to be stored whilst awaiting pickup, people will not want to keep them in their homes and bags are vulnerable if left outside, in many cases they must be carried through the house for disposal at the front of the property.

Members were assured that the many aspects of the new strategy will require further reports on specifics, the strategy is the overarching principle for the authority to move towards the Blueprint.

Residual waste collection frequency

A member asked what the impact on recycling was when we moved to fortnightly and what would be the potential impact of moving to four weekly collections. The committee was advised that the figure for fortnightly were not available at the meeting but could be checked. However, if we moved to three weekly it is estimated that there would be a 2-3% improvement in recycling and a four weekly collection would result in around a 5% improvement. This would still not take us to 70% target and there is no room for further improvement due to no new infrastructure. Changing frequency of residual waste collections while keeping the existing recycling system would also risk increasing the levels of contamination in the recycling bins.

Also, WG have not said what will be next in terms of targets, but we know there is a drive towards net 0% carbon emissions target by 2030 and zero waste by 2050. The reduction in the frequency of collection helps with carbon impact of transportation and the biggest impact of the WG blueprint for source segregated recycling is better quality recycling which can be used again in high value products e.g. recycled glass being used again in glass manufacture rather than the lower quality use as aggregate.

Finance

Concerns were raised on the significant costs outlined in the report and a member asked if the main factor is the new infrastructure required. The committee was advised that the acquisition and development of the new site is the main reason for the costs but there are other costs associated with the changes required including vehicles and containers.

Members asked where the funding will come from to meet the estimated costs. The committee was advised that Welsh Government have indicated that they will support a percentage of capital costs for infrastructure and vehicles. They are pushing local authorities to move towards the blueprint and the significant costs are because Caerphilly doesn't have the infrastructure capable of delivering the change i.e. a sufficiently sized depot to host the large number of vehicles required and a recycling facility for storage, baling and bulking recyclables.

A member highlighted that it appears that the Blueprint is something we must do, costs are significant at a time of severe financial pressures with no guarantees that it will work, so we may be spending £48.684m to save a $\pounds 2.713m$ fine.

Food Waste Caddies

Members asked what impact the trial of free food waste caddy bags has had and were advised that during the period January to March 2024 there had been a 11% increase in food waste tonnage compared to the same period last year. The early indications for the period April to May is that the increase is 25%. These figures are produced quarterly once they have been verified by NRW. The committee were pleased to hear of the improvement and would like to see these figures regularly.

In summary, the consensus of the group on the above points were:

- Container Management Challenges: Concerns about difficulty in managing new recycling containers, especially for residents in terraced properties or those with steps.
- Recycling Container Proposal: Mixed feedback on proposed use of boxes and bags for different recyclables. Suggestion to reuse existing brown bins, but new vehicles are incompatible with them.
- Staff Consultation: Importance of health and safety assessments for the new system; ongoing engagement with Trade Unions and workforce.
- Alternative Container Solutions: Discussion on stackable trolley boxes as an option for residents needing assistance, though some concerns were raised about their practicality.
- Container Capacity Issues: Additional boxes and bags could be provided, but this may burden residents with more containers to manage.
- Brown Bin Misuse: Concerns over brown bins left on streets and being misused, with a suggestion to explore lockable containers.
- Recycling Enforcement: Importance of separating recyclables for financial benefits and meeting recycling targets. Contaminated bins are being effectively monitored.
- Assisted Collections: Need for additional resources to support increased requests for assisted collections, with current systems in place to assess needs.
- Rear Lane Collections: Health and safety issues prevent the collection of all waste via rear lanes, limiting the use of these lanes.

- Household Recycling Centres (HRCs): Concerns about increased flytipping linked to changes at HRCs; no immediate decisions on closures until further assessments are made.
- Hygiene Waste Disposal: Need for sensitive and compliant hygiene waste disposal strategies, considering the challenges of storage and transportation.
- Waste Collection Frequency: Discussion on the potential impact of moving to less frequent residual waste collections; modest improvements in recycling rates anticipated.
- Financial Concerns: Concern was raised about the significant costs associated with the strategy (new infrastructure and vehicles); funding support from Welsh Government is expected but not guaranteed. Members were concerned that at a time when significant savings must be found resulting in very difficult decisions that >£20m needed to be committed to change a waste service which is popular with residents.
- Food Waste Caddies: Positive impact observed from the trial of free food waste caddy bags, with significant increases in food waste tonnage.

11. STATUTORY POWER

- 11.1. The following statutory powers relevant to the Draft Waste Strategy are identified:
 - Environment Protection Act (2010)
 - Revised Waste Framework Directive (2018)
 - Environment Act (2021)
 - Waste (Wales) Measure (2010)
- 11.2. Equality Act 2010 and Equality Act 2010 (Statutory Duties) (Wales) Regulations
 2011. One of the specific duties covers matters of consultation and engagement.

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Background Papers:

Draft Waste Strategy, Cabinet 17 January 2024 and Draft Engagement Strategy and Consultation Questionnaire, Cabinet 17 January 2024

Appendix One	Link to Proposed Waste Strategy Routemap
Appendix Two	Link to Revised Revenue and Capital Costs
Appendix Three	Link to Outline Business Case