

Cheltenham Borough Council
Cabinet – 13 October 2020
Environmental Services – Draft Strategy 2020-2030
and Updated Policy

Accountable member	Councillor Chris Coleman, Cabinet Member Clean, Green Environment
Accountable officer	Karen Watson, Environmental Partnerships Manager
Ward(s) affected	All
Key Decision	Yes
Executive summary	<p>Cheltenham Borough Council is committed to delivering sustainable long term environmental change and recognises the need to take action to tackle the climate emergency now to protect our environment for future generations.</p> <p>Given the extent to which environmental services, particularly waste and recycling, contribute to reducing the impact of climate change, an environmental services strategy has been developed (see appendix 2) taking into account the huge amount of change over the last few years and to help us tackle the challenges ahead including the reduction of plastics, particularly single use plastics within the council and the wider community.</p> <p>To support delivery of our long term environmental services strategy an action plan will be required and this will be developed over the coming months to sit alongside the environmental services policy, a policy which has been in place since 2011. The policy, attached to this report at appendix 2, has been reviewed and updated in recognition of the climate emergency and further strengthens the council's position on waste reduction and the need for high quality recycling at the kerbside via the 'no side waste and closed bin lid' and 'incorrectly presented/unsorted recycling box' sections as well as tackling the amount of recycling being disposed of in the residual waste skip at the household recycling centre in Swindon Road. The policy seeks to achieve behaviour change by supporting residents and businesses with advice and support, wishing to avoid formal enforcement action if possible.</p> <p>Delivery of our strategy and policy cannot be done in isolation and needs the support of the public, partners and the council's environmental services provider/partner, Ubico Ltd. Ubico Ltd is a teckal company wholly owned by local authorities, and has delivered high quality services during the pandemic and unlike some other authorities managed to maintain delivery of all our kerbside services throughout the year, working closely with the Council, despite the service challenges presented by COVID-19.</p> <p>In 2019 a value for money review of the services provided by Ubico was commissioned by the Council to ensure tax payers in Cheltenham were receiving high quality, cost effective and efficient services. The review demonstrates this is the case and provides confidence to the authority to</p>

further extend its contract with Ubico for delivery of our environmental services and seek a longer term partnership arrangement to deliver our strategic ambitions for Cheltenham.

To support delivery of the council's long term strategic ambitions this report recommends extending the existing contract for a maximum of 5 years and seeks to work with Ubico and other partner authorities to review and update the Ubico contract documentation in readiness for a longer term partnership/contract agreement with Ubico at the end of the 5 year contract extension or sooner if appropriate

Recommendations

That Cabinet:

- 1. Approves the draft environmental services strategy 2020-2030, including the draft single use plastics strategy for public consultation and delegates authority to Managing Director Place and Growth, in consultation with the Cabinet Member Clean Green Environment, to further develop this draft strategy and an action plan, for consideration by Cabinet in 2021 following public consultation.**
- 2. Approve the revised environmental services policy supporting the authority's recognition of the climate emergency particularly relating to:**
 - 2.1 Amendments to the no side waste and closed bin lid section as set out in the report at section 2.9**
 - 2.2 Introduction of the incorrectly presented/unsorted recycling box section as set out in the report at section 2.16**
 - 2.3 The reduction in single use black bags disposed of at the household recycling centre in Swindon Road to support removal of recycling from this waste stream over the next 12 months as set out in the report at section 2.22**
- 3. Approves the extension of the existing Ubico contract for the delivery of environmental services for the maximum period of 5 years and delegate authority to the Managing Director, Place and Growth in consultation with the Cabinet Member Clean Green Environment to:**
 - 3.1 formally write to Ubico to implement the contract extension prior to March 2021 and to do such other steps as are necessary to carry out this recommendation and**
 - 3.2 to work with Ubico and other partner authorities to review and update the Ubico contract documentation in readiness for a longer term partnership/contract agreement with Ubico at the end of the 5 year contract extension or sooner if appropriate.**

Financial implications	None identified as part of the strategy and updated policy. The new Ubico agreement will need to be considered in line with the Medium Term Finance Strategy. Contact officer: Andrew Knott, andrew.knott@publicagroup.uk
Legal implications	<ol style="list-style-type: none"> 1. Sections 46A to D of the EPA 1990 provide the Council with the powers and enforcement regime to deal with situations where occupiers fail to present waste in the manner the authority has specified. In order to take enforcement action the Council must be able to show that the occupier's failure to comply with the authority's requirements: <ol style="list-style-type: none"> (i) has caused, or is or was likely to cause, a nuisance, or (ii) has been, or is, or was likely to be, detrimental to any amenities of the locality. 2. As noted in the body of the report Ubico Ltd is a "Teckal " company. Under Regulation 12 of the Public Contracts Regulations 2015 contracts awarded to Ubico Ltd by the Council fall outside the public procurement regime, provided the authority remains a shareholder in the company. Thus the Council is free to extend its current contract with Ubico Ltd in accordance with its terms. The Council may also award a new contract to Ubico Ltd in the future without undertaking any new competitive exercise. 3. The Council needs to be satisfied that it has discharged its consultation duties imposed by section 3(2) of the Local Government Act 1999 (as updated by revised Best Value Guidance Statutory Guidance of March 2015) and has had regard to its duties under the Equality Act 2010. <p>Contact officer: Linden Dunham, Linden.Dunham@tewkesbury.gov.uk</p>
HR implications (including learning and organisational development)	None identified Contact officer: Clare Jones, clare.jones@publicagroup.uk
Key risks	Environmental, financial and reputational risk are set out in the risk assessment attached to this report
Corporate and community plan Implications	The content of the report supports the delivery of corporate priority 3 in the corporate plan
Environmental and climate change implications	The content of the report supports the implementation of a strategy, policy and partnership approach to successfully deliver the authorities corporate priorities and outcomes to improve the environment and climate change
Property/Asset Implications	None identified Contact officer: Dominic.Stead@cheltenham.gov.uk

1 Background

1.1 In the 25 Year Environment Plan, the government pledged to leave the environment in a better

condition for the next generation. The government's Resources and Waste Strategy published in December 2018 is intended to help meet that commitment and we are waiting for further government guidance and regulation around deposit return schemes and extended producer responsibility. It promotes the circular economy, sustainable production, helping consumers take more considered actions, cutting down on food waste, international leadership, research and innovation and measuring progress.

- 1.2** The EU's Circular Economy Package (CEP) includes increasing recycling rates for municipal waste up to 65% by 2035. The UK has committed to adopting these CEP targets even after Brexit. Cheltenham's current recycling rate, at the end of 2019/20, is 51.23% which means 48.77% of the municipal waste thrown away in Cheltenham is not recycled or re-used therefore there is room for improvement.
- 1.3** In 2008, local authorities in Gloucestershire adopted the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS) which provided a route map for managing waste in the county from 2007 to 2020. The main objectives of the 2007-2020 strategy were based upon a hierarchy of preferred approaches, focusing on waste prevention and reduction, recycling and composting more, and treating the remaining waste in a more sustainable way. The strategy outlined how this will be achieved by working together in partnership and many of the objectives are still relevant.
- 1.4** A new JMWMS will be developed by the new Gloucestershire Resources and Waste Partnership which replaces the Gloucestershire Joint Waste Committee. Cheltenham has committed to joining this new non statutory partnership which will have no delegated functions or funding requirement from Cheltenham and is intended to assist joint working across Gloucestershire, including development of the JMWMS.
- 1.5** The next ten years will see considerable change within waste, recycling and environmental services. In addition, the challenge of the climate emergency will demand that industry, businesses and residents consider their carbon footprint, how materials are used and aim to reduce waste.
- 1.6** Cheltenham Borough Council is committed to delivering sustainable long term change and recognises the need to take action to tackle the climate emergency now to protect our environment for future generations. It is essential that Cheltenham Borough Council develops an ambitious future waste and recycling strategy which is allied to an established flexible and efficient delivery partner, with access to the right assets and equipment if the council is to meet the goal of becoming carbon neutral and ensure that waste, recycling and environmental services meet current and future need.
- 1.7** We know Cheltenham is growing and our environmental services strategy will need to take account of this. By 2030 planners expect approximately 6,900 new homes, a population increase of almost 15,000 (population estimate formula $2.16 \text{ people per household by } 2030 - 2.16 \times 6,900$) and 39,500 new jobs for the whole Joint Core Strategy area.
- 1.8** A draft environmental services strategy has been developed taking into account the huge amount of change over the last few years and to help us tackle the challenges ahead including the reduction of plastics, particularly single use plastics within the council and the wider community. .. These strategies will in turn support the JMWMS as the overarching waste strategy for Gloucestershire as well as our own council corporate plan and the public will be consulted on them in 2021.
- 1.9** The Council's medium term financial strategy (MTFS) requires financial savings which can only be delivered by innovation, efficiencies, and maximising income generation and the action plan to deliver the strategy will need to take account of the Council's financial pressures, worsened by COVID-19. These challenges are even greater with the housing growth predicted which will inevitably increase service costs.
- 1.10** As part of the Council's commitment to ensuring that the council's environmental services, are fit

for purpose, deliver high quality and represent value for money, White Young Green (WYG) were commissioned to provide an independent review of all services currently undertaken by the Council's teckal company, Ubico. The scope of the review included the following service areas: waste and recycling; commercial waste; street cleansing, public conveniences and grounds maintenance.

- 1.11** WYG completed and presented the conclusions of their report in February 2019 and found that the council receives excellent value for money for the services that it commissions from Ubico and that if these services were delivered in the private sector (as opposed to a council-owned company) it would create significant additional cost to the Council. This is particularly the case in the areas of street cleansing and grounds maintenance which WYG singled out for particular praise for the excellent quality delivered when compared to the cost recharged back to the council. The conclusions within the WYG report have been taken into consideration when developing the environmental services strategy and will form part of the action plan to deliver it.
- 1.12** As evidenced in WYG's independent review, Ubico represents both excellent value for money, high quality of service provision and is a flexible operator that is well placed to deliver future change. Therefore, this report recommends that, to support the implementation of a future strategy, an extension of the existing Ubico contract is approved in line with clause 28.1 of the contract, for the maximum period of 5 years.
- 1.13** This report also recommends that the council works with Ubico and other partner authorities to review and update the Ubico contract documentation in readiness for a longer term partnership/contract agreement with Ubico at the end of the 5 year contract extension to ensure we are able to plan into the long term with confidence.
- 1.14** To further support delivery of our environmental services strategy and the delivery of longer term strategic ambitions, the council's environmental services policy has been reviewed and updated and further details are set out at 2.6 of this report.

2 Reasons for recommendations

2.1 Environmental Services Strategy

- 2.2** The government's developing national resources and waste strategy published in December 2018 will undoubtedly impact and influence the local strategies councils devise and develop in order to meet the challenge of encouraging greater reuse, recycling as well as reducing waste. In addition, the drive to deliver carbon neutrality by 2030 will have a considerable influence on the future of environmental services, not least on the types of vehicles, plant and equipment used to reduce the carbon emissions associated with completing collections.
- 2.3** At present, the technology required to deliver a fleet using alternative greener fuels is still developing as well as being expensive and this will need to be monitored closely and factored into our fleet replacement plans for 2024 including any infrastructure requirements. Similarly, greater engagement and education will be required to encourage residents and business to increase recycling and reduce unnecessary waste.
- 2.4** The council will only be able to meet the challenges ahead as set out in the background of this report with an ambitious, coherent strategy supported by an action plan that delivers the council's vision: We want Cheltenham to be a clean green and sustainable town that wastes less and recycles. We want to work towards being a zero waste town as well as being carbon neutral by 2030.
- 2.5** This report recommends that members approve the draft environmental services strategy including appendix A, a draft single use plastics strategy, and ask officers to develop an appropriately resourced action plan to deliver it which will also support delivery of the soon to be drafted Gloucestershire Joint Municipal Waste Management Strategy. The strategy documents will be

subject to public consultation before being brought back to Cabinet for final approval in 2021.

2.6 Environmental Services Policy

- 2.7** The existing environmental services policy has been in place since 2011 and requires reviewing and updating in line with the government's resources and waste strategy published in December 2018, the climate emergency and to support our own environmental services strategy.
- 2.8** Most of the existing policy remains unchanged as it is still relevant however the main changes to the policy are set out below and all support the need to reduce waste and increase high quality recycling.
- 2.9** No side waste and closed bin lids
- 2.10** This is part of the existing environmental services policy in place now and is intended to make residents think about how much waste they are generating and encourage a better take up of the recycling service as well as the food waste service.
- 2.11** The updated process for dealing with additional residual waste presented at kerbside is called 'no side-waste and closed bin lid' process and revolves around education and advice as set out in the policy. At all stages the council offers advice and support to help residents, most of whom want to do the right thing but either haven't thought about it or don't know how to go about it.
- 2.12** Essentially residents will receive a warning sticker signposting them to advice on the first occasion they present too much residual waste; on the second occasion, two weeks later, they will receive a letter providing fuller information and the reasons why minimising waste is important - the advice will include information about recycling as well; on the third occasion, 4 weeks after the first warning sticker, the resident will receive a final warning sticker confirming that the matter has been passed on for enforcement action but still offering an opportunity for the resident to get help and reduce the waste. The resident will have the opportunity after the third warning for a period of two weeks' to reduce their waste or contact the council for help, a total of six weeks to change what they do with their waste.
- 2.13** If the resident still doesn't reduce the amount of waste presented after the six weeks has elapsed, public protection will pursue enforcement action in accordance with S46 of the Environmental Protection Act. Residents will have six weeks to get it right from when they are first warned before the excess waste is left at kerbside for the householder to dispose of and investigation in accordance with S46 of the Environmental Protection Act begins. Adequate warnings will be given and every opportunity will be taken to provide help and advice including home visits (subject to risk assessment relevant to lone working and COVID-19). The formal enforcement procedure is set out at appendix B of the policy.
- 2.14** Systems thinking work previously carried out indicated that majority of households changed what they did following a letter which provided information and help. It is expected that only a small percentage of households will be passed to public protection for S46 enforcement action.
- 2.15** The council has had the existing policy in place for some time but chose to allow residents an opportunity to get used to it before pursuing enforcement action for those not doing the right thing for the environment. Requiring bin lids to be closed and preventing overloaded bins is a health and safety requirement to prevent fatal accidents when operatives load the bins on the vehicle. Since 2011 nearly all other local authorities in Gloucestershire implement a no side waste policy of some sort and do not take excess waste. Cheltenham will now be fully implementing its policy and ensuring that no excess waste presented is taken.
- 2.16** Incorrectly presented/unsorted recycling
- 2.17** Whilst the existing policy requires residents to sort their recycling, avoiding contamination, and the

website sets out how they should do this, there is no process for education and advice or enforcement if they do not do this.

- 2.18** The updated process for dealing with incorrectly presented/unsorted recycling presented at kerbside also revolves around education and advice as set out in the policy. At all stages the council offers advice and support to help residents, most of whom want to do the right thing but either haven't thought about it or don't know how to go about it.
- 2.19** Essentially residents will receive a warning sticker signposting them to advice on the first occasion they incorrectly present or do not sort their recycling; on the second occasion, two weeks later, they will receive a letter providing fuller information and the reasons why minimising waste is important - the advice will include information about how to sort recycling; on the third occasion, 4 weeks after the first warning sticker, the resident will receive a final warning sticker confirming that the matter has been passed on for enforcement action but still offering an opportunity for the resident to get help and properly sort their recycling. The resident will have the opportunity after the third warning for a period of two weeks' to sort their recycling or contact the council for help, a total of six weeks to change what they do with their recycling.
- 2.20** If the resident still doesn't sort their recycling after the six weeks has elapsed, public protection will pursue enforcement action in accordance with S46 of the Environmental Protection Act. Residents will have six weeks to get it right from when they are first warned before unsorted recycling is left at kerbside for the householder to properly sort and investigation in accordance with S46 of the Environmental Protection Act begins. Adequate warnings will be given and every opportunity will be taken to provide help and advice including home visits (subject to risk assessment relevant to lone working and COVID-19).
- 2.21** The council wishes to encourage waste reduction and recycling and is doing what is practicable to ensure residents have adequate provision for recycling. Residents who need additional recycling boxes to sort recycling properly will be encouraged to collect them from the household recycling centre in Swindon Road however a free of charge delivery service for those residents unable to collect boxes when near the household recycling centre will remain in place.
- 2.22** Recyclable waste and non-recyclable waste at the household recycling centre
- 2.23** To support our drive to reduce residual waste and increase the amount of recycling removed from this waste stream it is appropriate to also consider how much residual waste is processed by the household recycling centre at Swindon Road and we know from bag splitting exercises at the site that about 50% of the contents of black bags disposed of is recyclable.
- 2.24** To ensure less recycling is being put into the residual waste skip, householders will be encouraged to stop disposing of residual waste in single use black plastic bags and change to using either clear re-usable plastic bags to show there is no recyclable material contained in the bag or another type of reusable container which can easily be tipped into the skip. This will be phased in over the next 12 months to allow residents an opportunity to acquire re-usable clear bags or other reusable containers. This initiative will also support the reduction of single use black plastic bags in Cheltenham.
- 2.25** Weeds, bees and biodiversity
- 2.26** The updated policy also includes an outline of the council's developing approach to weed control. It seeks to minimise the use of glyphosate herbicides, move to more environmentally friendly approaches to weed removal within existing resources and promote wild flower planting and biodiversity. This is set out at appendix A of the policy.
- 2.27** **Provision and delivery of environmental services**
- 2.28** The council committed to undertaking a review of waste, recycling and environmental services to

inform the future development and improvement of the service. The decision to end the formal partnership of the Gloucestershire Joint Waste Committee (GJWC) in 2019 and Cheltenham Borough Council's creation of a dedicated commissioning function provided a further driver to review and test current services and inform future strategy

The scope of the review included:

- Waste and recycling
- Commercial Waste
- Street cleansing & public conveniences
- Grounds maintenance (including sites maintained on behalf of Cheltenham Borough Homes)

The aim of the review was to:

- Assess the quality of services provided
- Determine whether the council's partner Ubico was providing value for money comparative to alternative service models e.g. commissioning a private contractor
- Make recommendations for improvements

2.29 To provide necessary independence, an external company, White Young Green (WYG) were commissioned to undertake the review. WYG were chosen due to their considerable experience in the sector and their direct experience of supporting many local authorities to assess and procure environmental services. Their work with local authorities has allowed WYG to build a significant body of service data that provides an essential means of comparing services and providing commissioners with confidence in their assessment of quality.

WYG's methodology for conducting the review included the following:

- undertaking site visits
- interviewing staff at CBC, CBH and at Ubico
- benchmarking of outputs
- calculating a private-sector cost equivalent for the services – subject to data

2.30 A joint project team was established between the Council and Ubico to collect necessary data and utilise industry-standard vehicle route planning software to produce outline analysis of vehicles and resources required to fully roll-out a weekly service.

2.31 WYG were also requested, as part of their overarching report on the existing service to provide a headline assessment of the potential resources and costs of implementing a weekly recycling service.

2.32 Headline Findings – WYG Report

2.33 WYG completed their final report in February 2020 and reported headline findings are as follows:

Waste & Recycling

- Overall, the service represents good value for money and costs ca. £350K per annum less than a private sector contractor would charge.
- Whilst performance is satisfactory some improvements can be made to improve efficiency and productivity of some collection rounds.
- To maximise productivity, the council should conduct a more detailed review to fully optimise rounds. In addition, the composition and type of some vehicles should be reviewed when appropriate to maximise efficiency.

- The council should seek to encourage the pre-sorting of recycling material at the kerbside to improve collection efficiency.
- The costs of operating the Household Recycling Centre are entirely reasonable and low when the opening hours of the centre are taken in to account.

Commercial Waste

- The services offered to commercial businesses are comprehensive
- The service operates at a profit.
- Turnover is not high given nature of Cheltenham and scope exists to further develop the service and improve profitability.

Street Cleansing & Public Conveniences

- Overall street cleansing in Cheltenham was to a very high standard particularly in the town centre – well above ‘normal’ standards, representing excellent value for money.
- Very few litter failures were observed across the Borough however some detritus and was more common further from the town centre
- Some site visits showed evidence of weed growth, however, subsequent visits (following weed spraying) showed a noticeable reduction.
- The majority of car parks surveyed were free from litter and levels of detritus were minimal.
- Of the Bring Sites surveyed there were small amounts of litter present but there was evidence of fly-tipping at some sites.
- Public conveniences were cleaned to a good standard, however, some of the sites require investment and improved signage.

Grounds Maintenance

- Overall grounds maintenance is delivered to an very high standard across the borough, representing excellent value for money. Some parks and open spaces are comparable with some of the best standards seen nationally.
- Several of the social housing blocks had expanses of grass surrounding them, of those inspected all were found to be well maintained and recently cut.

2.34 The detailed service review and value for money assessment completed by WYG has confirmed that, overall, Ubico deliver a good quality services and represent value for money to CBC. Street cleansing and grounds maintenance in particular have been highlighted as being excellent services and as an example of high quality at comparatively low cost. As a collective package, CBC can be confident that if these services were provided under a singular private sector contract it would cost the council significantly more – estimated to be over £1m per annum to receive the same standard of service. However, CBC and Ubico should continue to strive for improvements in productivity and further investment in technology is needed to optimise and modernise the service.

2.35 Under a council-owned Teckal arrangement, Ubico also offers flexibility to implement significant future change whilst minimising the costs. It also offers established, local expertise and have worked closely with CBC to inform the development of future strategy and key commissioning decisions.

2.36 In addition, since 2012, Ubico has had the opportunity to consolidate its operation and deliver continuous improvement. For example, the company has achieved both the ISO 14001 and 45001 standards in Environmental Management and Health and Safety and has consistently worked with shareholder partners to improve the quality of performance and financial information provided. This should provide further assurance to CBC of the quality and safety of the service provided. With additional targeted investment, the company has further potential to deliver greater value back to

shareholders via greater efficiencies or commercial success. The fact that 6 of Gloucestershire's 7 councils are all current shareholders presents future scope for partnership working that will increase the resilience, efficiency and quality of services for residents.

- 2.37** When considering that the medium term is likely to present significant challenges and decisions to CBC on the future of environmental services it is recommended that the existing partnership with Ubico continues beyond the current agreement in order to support CBC achieve its strategic ambitions and meet future needs.
- 2.38** The report therefore recommends that members approve the extension of the existing Ubico contract for the delivery of environmental services for the maximum period of 5 years. It also recommends that working with Ubico and other partner authorities to review and update the Ubico contract documentation in readiness for a longer term partnership/contract agreement with Ubico at the end of the 5 year contract extension or sooner if appropriate.

3 Alternative options considered

- 3.1** With the amount of national policy change and the urgency the climate emergency demands, the council will only be able to meet these challenges with an ambitious, coherent strategy supported by an action plan and updated policy that delivers the council's vision: We want to Cheltenham to be a clean green and sustainable town that waste less and recycles. We want to work towards being a zero waste town as well as being carbon neutral by 2030.
- 3.2** To support delivery of the council's ambitious long term strategy, close working relationships with our environmental services provider will required and this will influence not only strategic decision making but also our financial well being. The council could choose to go out to the market, undertaking a full procurement exercise, for a long term service provider however, given the financial cost of carrying out this procurement and in light of our current service providers high levels of performance during the COVID-19 pandemic and the results of the WYG value for money review it is not recommended as an option.
- 3.3** This report recommends an extension to the existing contract arrangement with Ubico.

4 How this initiative contributes to the corporate plan

- 4.1** The environmental services strategy and appendices, along with the updated policy have been specifically produced to strengthen our ability to deliver key priority 3 within the council's corporate plan and the action plan will focus entirely on the objectives and outcomes to support this.

5 Consultation and feedback

- 5.1** The draft environmental services strategy and appendices, along with the updated policy have been subject to internal consultation and provide a direction of travel for the authority.
- 5.2** An environmental impact assessment has been carried out and the implementation of the updated policy will focus on advice and support with the aim of minimising the need for formal enforcement action and as such, given the environmental imperatives and the constraints presented by COVID-19 in terms of meaningful consultation over and above an on line survey, further consultation on the implementation of the updated policy will take place as part of the public consultation on the strategy planned in 2021.
- 5.3** The draft environmental services strategy and appendices will be subject to further consultation including public consultation along with the Joint Municipal Waste Management Strategy being drafted by the newly formed Gloucestershire Resources and Waste Partnership for final approval by members in 2021.

6 Performance management –monitoring and review

- 6.1 The environmental services strategy will be subject to public consultation before a final version is brought back to members for approval including an action plan to deliver it. Once approved progress will be reported annually to members.
- 6.2 The environmental services policy will be reviewed annually as required and any changes will be brought before members for approval.
- 6.3 A robust commissioning arrangement will remain in place to continue to develop strong partnership arrangements between CBC and Ubico. This will deliver robust contract monitoring through established budgetary and service monitoring governance with both CBC and Ubico.

Report author	Contact officer: Karen Watson, Environmental Partnerships Manager Karen.watson@cheltenham.gov.uk, 01242 264397
Appendices	<ol style="list-style-type: none">1. Risk Assessment2. Draft environmental services strategy including draft single use plastics strategy (appendix A)3. Environment Services Policy including our approach to weed control (appendix A) and formal enforcement procedure (appendix B)
Background information	<ol style="list-style-type: none">1. Resources and waste strategy published December 2018

Risk Assessment

Appendix 1

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If the council does not implement policies to reduce residual waste in line with government guidance the council will be less able to meet its recycling rate target and support the climate emergency	Karen Watson	25/9/20	2	1	2	Reduce	Develop an action plan to support the draft strategy and implement the updated policy attached to this report	Reviewed annually	Karen Watson	Updated risk will be transferred after the cabinet decision 13/10/20
	If the council does not implement policies to reduce residual waste in line with government guidance and improve the quality of recycling collected, the council will be less able to meet the requirements of the medium term financial strategy.	Karen Watson	25/9/20	2	3	6	Reduce	Develop an action plan to support the draft strategy and implement the updated policy attached to this report. Work with Ubico and re-processors to maximise the quality of recycling materials to ensure more is recycled at a higher income to the council.	Reviewed annually	Karen Watson	Updated risk will be transferred after the cabinet decision 13/10/20
	If the council fails to provide adequate advice and support to the public when it implements the no side waste and	Karen Watson	25/9/20	2	2	4	Reduce	The clean green team will prioritise the implementation of the policy in conjunction with Ubico and work	Review Dec 2020	Karen Watson	Updated risk will be transferred after the cabinet decision

	unsorted boxes section of the updated policy it is likely to receive greater levels of negative publicity and challenge.							closely with customer services, proving relevant information to assist the public and minimise the need for S46 enforcement. Public consultation will take place as part of the strategy in 2021			13/10/20
	If tighter controls as a result of COVID-19 restrict the council's ability to provide advice and support to residents, the policy will be less effective and likely to generate more negative publicity and challenge.	Karen Watson	25/9/20	3	3	9	Accept	To reduce this risk the clean green team will prioritise the implementation of the policy in conjunction with Ubico and work closely with customer services, proving relevant information to assist the public and minimise the need for S46 enforcement. More telephone and email contact will be delivered if home visits are prohibited due to COVID-19. Public consultation will take place as part of the strategy in 2021		Karen Watson	Updated risk will be transferred after the cabinet decision 13/10/20
	If the council fails to	Karen	25/9/20	2	2	4	Reduce	The clean green	Review	Karen	Updated

	provide adequate explanation and action regarding weed removal and the promotion of biodiversity, the council may see negative publicity and a lack of support from the public	Watson/Adam Reynolds					team will prioritise the implementation of the policy in conjunction with Ubico and work closely with green space and customer services, providing relevant information to assist the public	Dec 2020	Watson/Adam Reynolds	risk will be transferred after the cabinet decision 13/10/20
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Explanatory notes

Impact – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)

Likelihood – how likely is it that the risk will occur on a scale of 1-6
(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)

Control - Either: Reduce / Accept / Transfer to 3rd party / Close