



# SCRUTINY FLY-TIPPING TASK GROUP

## NOVEMBER 2015

**Cllr Sam Stopp (Chair)**  
**Cllr Krupa Sheth**  
**Cllr Bernard Collier**  
**Cllr Amer Agha**  
**Mr Colin George**  
**Mr Chirag Gir**

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# 1. THE CHAIR'S FOREWORD



Fly-tipping (or “illegal dumping”) is without doubt one of the biggest issues facing Brent today. In the ward I represent, Wembley Central – it is by far the biggest concern. Anecdotally, most councillors report that complaints about fly-tipping via emails and on the doorstep are among the most common they receive.

At a key moment in Brent's history, when cuts to the council's budget are demanding extremely difficult funding decisions, the effect of issues such as fly-tipping on community spirit must not be underestimated. It is therefore vital for the council to consider innovative and long-lasting solutions to the problem.

This review has assessed the issue of fly-tipping in all of its aspects. It has looked at how bad the problem is in Brent, how we compare to other authorities, why people fly-tip and what can be done about it. In a borough the size of Brent, causes and solutions will differ. But what is clear is that this is a major issue and the solutions to it will need to come from a range of departments – including Environment, Children and Young People, Housing and Development, and Communities.

This investigation has involved significant public consultation, but it has also focussed on a top-to-bottom analysis of Brent Council's internal and external processes for dealing with fly-tipping. The recommendations which have been made are the result of both listening carefully to what Brent residents want and looking afresh at every single aspect of how the council is approaching the issue.

My overarching conclusion is that dealing with the blight of fly-tipping will require a long-term strategy, not mere quick fixes. Reactive publicity campaigns, isolated success stories in the media and clean-up days will not be enough. Indeed, the way in which Brent communicates about this issue needs to change. Residents who complain to the council about fly-tipping should no longer receive an automated email acknowledging their concern. They should get a human response indicating that the matter is being looked into.

Beyond the council itself, priority must be given to empowering community organisers and action groups by enshrining their role in Brent's bureaucratic structures. The council must work with such organisations to explain in person the damage done by fly-tipping. This will require door-to-door exercises, as well as working with community groups – residents' associations, religious organisations, youth clubs etc. It will also involve changing the way local schools communicate the value of respect for the local community and the problems fly-tipping causes.

There are many specific recommendations below, all of which I hope will be adopted by the council. Yet it strikes me that what is most important of all is not policy, or finances, or procedures. It is mind-set. When I see the brilliant work being done in my own ward by 'Keep Wembley Tidy', it proves to me that there are more people who care about Brent and the state of its environment than there are those who do not care.

So this is the challenge. Brent Council must work alongside the decent majority of residents in our borough to tackle the blight of fly-tipping so that future generations are free to grow up in a Brent that is clean and healthy and above all a place befitting its status as the iconic home of English football.

I am immensely grateful to the members of the task group for their support and hard work; in particular, local residents Chirag Gir and Colin George, whose insights and experience have been invaluable.

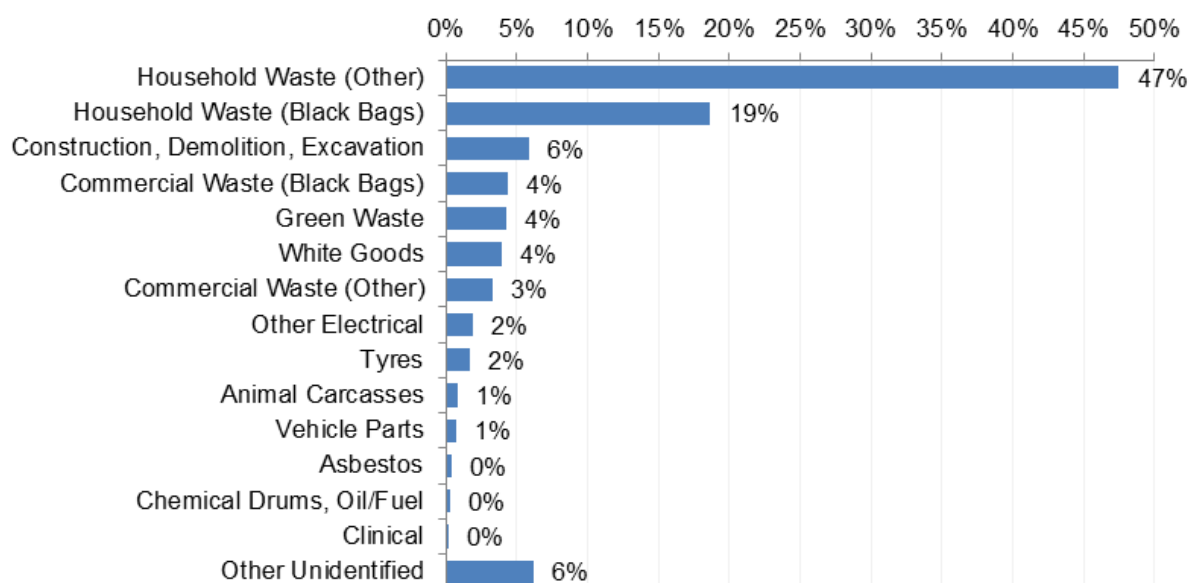
## 2. EXECUTIVE SUMMARY

Fly-tipping is the illegal deposit of waste on land contrary to Section 33(1)(a) of the Environmental Protection Act 1990. The types of waste fly-tipped range from 'black bag' waste to large deposits of materials such as industrial waste, tyres, construction material and liquid waste. Fly-tipping is a significant blight on local environments; a source of pollution; a potential danger to public health and a hazard to wildlife. It also undermines legitimate waste businesses where unscrupulous operators undercut those operating within the law.

Local authorities and the Environment Agency (EA) both have a responsibility in respect of illegally deposited waste. Local Authorities have a duty to clear fly-tipping from public land in their areas and consequently they deal with most cases of fly-tipping on public land, investigating these and carrying out a range of enforcement actions. The Environment Agency investigates and enforces against the larger, more serious and organised illegal waste crimes.

Both Local Authorities and the Environment Agency are required to collect data on their activity and report this to the Fly Capture database. Responsibility for dealing with fly-tipping on private land rests with private landowners and is not subject to mandatory data reporting.

Types of fly-tipping incidents in England, 2013/14 as a proportion of total incidents<sup>1</sup>



There is significant public concern in Brent about a perceived increase in fly-tipping over the last few years. It is suggested in some quarters that cuts to Brent's budget, handed down by central government, have adversely affected our ability to keep the streets clean.

Furthermore, it is possible that the apparent increase in fly-tipping is a symptom of declining community spirit and cohesion.

<sup>1</sup> Other household waste could include material from house or shed clearances, old furniture, carpets and the waste from small scale DIY works. Other commercial waste could include pallets, cardboard boxes, plastics, foam, and any other waste not contained in bags or containers and not due to be collected.

It is for these reasons that this issue is so seminal in its importance to the relationship between the council and Brent residents within its jurisdiction.

Uncontrolled waste disposal can be hazardous to the public, especially when the waste consists of drums of toxic material, asbestos sheeting, syringes or used drugs. There could be a high risk of damage to watercourses and underlying soil quality from the dumped waste. Fly-tipping looks unsightly and this can harm investment in an area. Cleaning up fly-tipping costs taxpayers' money which could be better spent funding other much needed services.

According to the Department for Environment, Food and Rural Affairs Fly Capture Database, the most common types of fly-tipped waste are, starting with the greatest quantity: general household waste; white goods (fridges, freezers and washing machines); construction rubbish (demolition and home improvement rubbish); garden rubbish; and rubbish from businesses.

### 3. RECOMMENDATIONS

#### Knowledge

1. The task group recommends that the term “Fly-tipping” should be changed to “Illegal Rubbish Dumping” (IRD) in communications with residents. Residents rarely refer to dumped rubbish as fly-tipping and there is apparently confusion among some residents about what “fly-tipping” actually means.

This is not a good basis on which to communicate with residents about the issue, therefore the task group recommends changing the language we use.

\*We recognise that authorities and bodies outside of Brent will, for the time being, probably continue to refer to illegal rubbish dumping as “fly-tipping”, so we accept that we will have to use this language when communicating with them.

2. A named officer/s within the Waste Management service should be responsible for continuous monitoring of new methods to tackle IRD, keeping the council abreast of the latest developments and leading improvement practices; not just from other London boroughs and the UK, but from Europe and the rest of the world. The task group supports the behavioural studies that the council is currently participating in as part of the West London Alliance (WLA) and recommends that it should continue to build on this area of work.
3. Brent Waste Management service should review its internal benchmarking, looking internally at how we monitor our own performance and should report performance quarterly in public. It is recommended that this is communicated to residents and other councillors via the council’s website and Brent Magazine.
4. Brent Waste Management should liaise with neighbouring London boroughs to develop a benchmarking network. The West London Alliance (WLA) would be a good place to start as there are links already established. There should also be additional cross-border networking, feeding into intelligence with the aim of bringing forward more prosecutions for trade waste dumping.

#### Education

5. Constitutionally empower “Community Guardians” by appointing, through an agreed selection process, figureheads like the chair of Keep Wembley Tidy. Councillors can support this by identifying suitable candidates. These guardians are to be given a profile on the council’s web page, support and resources from the council and Veolia; to tackle illegal rubbish dumping in their appointed locations.

- 5.1. It was identified in the task group’s research that residents often identify with different place names than the wards in which they live. The task group is recommending that the community guardians structure in Brent is mapped in the following village localities and guardians are allocated to these areas:

Wembley	Dudden Hill	Kensal rise
Kenton	Neasden	Stonebridge
Queens Park	Sudbury	Kilburn
Harlesden	Alperton	Willesden

\*This list is intended as a guide and residents are of course free to suggest the names for their own campaigns, as well as the areas these campaigns cover. Keep Wembley Tidy covers Wembley Central and Alperton wards, and it is suggested that campaigns should not overlap with one another. This approach should be integrated with the voluntary Community Action Groups.

- 5.2. Guidance and a code of practice for the community guardians and village areas should be drawn up and agreed by officers and residents. This should include action days and identifying and evidencing illegal rubbish dumping hot spots. Village websites should also be linked to the council's waste management web pages.
- 5.3. It will be a priority of the community guardians, councillors, officers and Veolia to devise and produce a 'Brent Against Rubbish Dumping Charter', which Businesses, HMO Landlords and Estate/Letting Agents will be encouraged to sign up to and display publicly.
- 5.4. It will be a priority of the community guardians, councillors, officers and Veolia to engage with places of worship, youth clubs and sports clubs to engage and promote the Brent Against Rubbish Dumping Charter.
6. The process of reporting IRD should be clear and straightforward, so that both residents and officers know what is to be expected and how and when there will be communication between parties. This should be documented on the council's IRD web page.
7. Brent waste management and Veolia should liaise with Brent education and Brent schools partnership to ensure that there is a strategic anti-illegal rubbish dumping programme going into schools, aimed at both primary school and secondary school level. The programme should be continuous and target 100% of schools on an annual basis, encouraging schools to sign up to the Brent Against Rubbish Dumping Charter. Progress should be reported on the council waste management web page on a quarterly basis.
8. Business liaison should be part of an officer's role; this should include an evaluation of any non-monetary incentives that can be offered. Brent should encourage businesses to sponsor a bin or bins, as a result of which businesses will become certified and will be allowed to display a Brent Council sign stating that they are opposed to IRD.
9. Additional resources should be invested in to the Special Collection Service, so that items are collected sooner and the number of bulky items illegally dumped is reduced. Other alternative options for waste disposal and recycling should be promoted with direct links on the council's web page and offered on the phone when residents call to request Special Collection Services such as Freecycle and Freegle.

## Enforcement

10. The task group recommends the formation of a strategic approach between Waste Management Enforcement services and the CCTV service to ensure more use of the current CCTV provision to monitor IRD hotspots. It is understood that this will require collecting evidence and providing a supported case for each camera.

\*The task group endorses all of the recommendations on IRD made by the concurrent CCTV task group.

11. Waste management services, specifically trade and Environmental health services, must work together more strategically; sharing information and working on joint visits where there is clear intelligence that there are crosscutting priorities.
  12. A strategic approach between Housing Enforcement and Waste Management Enforcement services via Veolia should be formed to ensure that HMO landlords are educated as to their responsibilities regarding waste disposal for themselves and their tenants.
  13. Enlist the support of night workers such as black cab drivers and night bus drivers to use the cleaner Brent app and report any perpetrators of IRD. This could be achieved by contacting taxi firms and Transport for London to explain our case and by asking them to cascade our request down to workers. The council would in turn be able to release positive press stories about these organisations.
  14. We will look to pre-capitalise on new fly-tipping legislation, to be brought forward next year, by following a similar model to Ealing Council, as below:  
  
'The council has teamed up with Kingdom Security to provide dedicated teams of uniformed officers in the borough. Kingdom Security will work with the council's environmental enforcement officers, providing a high-profile deterrent and issuing £80 fines. Operating initially on a one-year trial basis, Kingdom Security is working at no cost to the council. Instead they will take a share of the fines they issue'.
  15. The Council should work with other local authorities and the National Fly-tipping Prevention Group to lobby the Government for more effective enforcement powers.
  16. The selective Landlord licensing scheme should be reviewed annually and reported on publicly with statistics on how effective the scheme has been, where it has been effective, areas where the council can strengthen its enforcement and any lessons learnt.
  17. The landlord licensing guidance should have more detail in the wording regarding waste & refuse, so that it is harder for landlords to avoid discharging their responsibilities effectively.
- ❖ The most referenced licensed scheme is that of Newham Council's. Newham's licensing condition in respect of waste simply requires that "No refuse shall be kept in the front or rear garden other than in an approved storage container for that purpose".



18. Leaflets about Brent's waste disposal policies should be inserted into the guidance so that landlords can give them to tenants. The leaflet/insert scheme should also be rolled out to estate & letting agents.

#### Impact

19. Further investigation is required into the impact of the garden waste collection charges. Cabinet should review its effectiveness from a cost and efficiency perspective, annually until 2018.
20. Owing to the lack of quantitative data to evidence the effects of the garden waste charge at this stage, officers should review and report the effects of its first year in operation. Officers should devise logical metrics against which it can compare its performance annually until 2018.
21. The number of Brent residents that have signed up, and continue to sign up, to the Garden waste collection service should be more widely publicised. The Brent website and Brent magazine should be the media for this.

#### Publicity

22. Future publicity about IRD should be continuous, mainly word-of-mouth and not confined to one-off PR campaigns. The last major PR campaign in 2013 involved large, difficult-to-read signs under which rubbish was dumped. It also saw photo opportunities to show the lead member was determined to deal with the issue, but officers confirm that it had little tangible impact on levels of IRD.
23. Officers, councillors and community guardians need to visit relevant local meeting places – whether they be religious meeting places, youth clubs or sports clubs – to pass on the council's messages about IRD and how communities can work with Brent to tackle it.
24. Leafleting campaigns led by the council and voluntary groups should be in multiple languages, appropriate to the socio-dynamics of the local area.
25. Any future communications should also be easy-to-read with no conflicting messages. This should be backed up with targeted local advertising. Brent London Underground and National rail stations are prime locations for such advertising.
26. The Cleaner Brent App requires further publicity, and probably a re-launch, as not enough people are aware it exists. There should be further publicity on the web and in the Brent magazine.

## 4. INTRODUCTION – SCOPE OF THE TASK GROUP

### What are the main issues?

- DEFRA report that nationally it costs an estimated £86m-£186 million every year to investigate and clear up fly-tipping. This cost falls on taxpayers and private landowners
- Fly-tipping poses a threat to humans and wildlife, damages our environment, and spoils our enjoyment of our towns and countryside
- Fly-tipping undermines legitimate waste businesses where illegal operators undercut those operating within the law. At the same time, the reputation of legal operators is undermined by rogue traders
- As with other things that affect local environmental quality, areas subject to repeated fly-tipping may suffer declining reputations and local businesses may suffer as people stay away
- Fly-tipping harms Brent's image as an attractive place to live and work. Brent was recently ranked 3<sup>rd</sup> in a national survey of the worst boroughs in which to live

\* Please note the “worst borough” survey data was heavily based on the relative cost of housing to average income levels. There was no indicator in the survey that related to fly-tipping.

### What the review addressed

#### The review considered the following key areas:

- Knowledge
  - Behavioural and sociological research /information from other authorities on successful strategies
  - Why do we have the fly-tipping levels we do?
  - Increasing trends and possible links to the introduction of charging for the green bin (has this increased dumping of garden waste?)
- Education
  - Public communication
  - Education (at schools and through community / cultural groups)
- Enforcement
  - Current systems (to what extent is this proving effective?)
  - Success of enforcements
  - Deterrents (e.g. CCTV)
  - Trade waste and dumping
  - Landlord dumping
- Impact
  - Impact of new ‘garden waste collection charge’
  - Impact of Landlord Licensing in reducing the issue
- Publicity
  - Success / failure of previous and current publicity campaigns
  - Analysis of the level of public awareness

## **The objectives of the review**

### **The aims of the review are set out below:**

- Better understanding of residents' waste disposal behaviour in Brent
- Clearer understanding of the council's role and the work it undertakes regarding fly-tipping
- Reduction in the levels of fly-tipping in Brent
- Cleaner and safer environments for all Brent residents
- Reduction in clean-up and enforcement costs
- Opportunities for increased revenue
- More community involvement and stronger residents and council relationships
- Better community spirit and cohesion
- Efficiency savings, such as officer time

## 5. TASK GROUP MEMBERSHIP

Cllr Sam Stopp (Chair)  
Cllr Krupa Sheth  
Cllr Bernard Collier  
Cllr Amer Agha  
Mr Colin George  
Mr Chirag Gir

## 6. METHODOLOGY

In order to gather the relevant evidence for this review, the task group invited relevant partners and residents to get involved; through discussion groups, meetings and visits. The earliest part of the reviewed considered previous reports and studies into the fly-tipping culture and behavioural trends. This involved liaising with the Environment Agency and non-governmental agency, Keep Britain Tidy.

The second part of the review focused on information relevant to Brent and this involved close working with the Operational Director of Community Services and the Waste Enforcement team. Central and most vital to the review were the voices and views of local residents. The task group held four themed discussion groups, which reflected the key areas of the review. Local resident groups were invited to attend, along with officers and partners.

### **Partners: Group 1**

- Relevant Council Departments
- Brent Partners
- Environment Agency
- Keep Britain Tidy
- Other best practicing Local Authorities

### **Partners: Group 2**

Resident Associations & Local Groups:

- Harlesden Town Team
- Reach Team – Kensal Green
- Willesden Green Town Team
- Harlesden Town Team
- The Cricklewood Town Team
- Alperton Riverside Town Team
- Keep Wembley Tidy

\*A full list of participants of the task group's work can be found in section 10 of this report

## 7. POLICY CONTEXT

### 7.1. Brent

IRD is not a just a Brent problem. It is a problem experienced by all areas of the country, urban or rural. The task group investigated what types of rubbish are being dumped i.e. is it household waste that people cannot fit into their domestic waste collection service, garden waste due to the green bin charge, trade waste from local businesses or builders' debris? The task group also considered possible dumping by landlords and Brent's transient population – i.e. the dumping of mattresses and old furniture.

Fly-tipping incidents reported by local authorities in 2013-14		
LA Name	Total Incidents	Total Incidents Clearance Cos
Newham LB <sup>(a)</sup>	67980	£3,026,234.00
Enfield LB	31692	£1,348,880.00
Haringey LB	31045	£1,491,507.00
Southwark LB	26638	£1,108,692.00
Westminster City Council	17121	£699,653.00
Hounslow LB	15864	£564,135.00
Croydon LB	15113	£1,366,642.00
Greenwich LB	12765	£715,829.00
Camden LB	10950	£229,852.00
Lewisham LB	9152	£293,672.00
Hammersmith and Fulham LB	9011	£529,042.00
Redbridge LB	8989	£390,390.00
Harrow LB	8429	£740,504.00
Hackney LB	7635	£1,210,485.00
<b>Brent LB</b>	<b>7001</b>	<b>£425,399.00</b>
Chelsea	6984	£273,482.00
Ealing LB	5765	£243,201.45
Tower Hamlets LB	5201	£241,176.00
Waltham Forest LB	4723	£184,419.00
Havering LB	3620	£157,650.00
Merton LB	3064	£172,574.00
Richmond upon Thames LB	2871	£61,393.00
Bromley LB	2809	£190,587.93
Islington LB	2634	£101,706.00
Hillingdon LB	1995	£90,405.00
Barnet LB	1779	£51,836.00
Barking and Dagenham LB	1282	£119,278.00
Sutton LB	1264	£89,049.00
Lambeth LB	1206	£98,523.00
Wandsworth LB	1105	£78,083.00
Bexley LB	1078	£45,111.00
London Corporation	530	£15,331.00
Kingston-upon-Thames LB	339	£14,466.00

It is worth noting that the methods used to capture and record data by local authorities are not consistent and that is why there is a vast difference in the figures above.

High incident areas within Brent:

- Harlesden
- Mapesbury
- Willesden Green
- Kensal Green
- Queens Park
- Wembley Central
- Alperton

### **Brent Waste Enforcement**

Brent urges residents to take an active role and responsibility in keeping their communities clean. Brent encourages residents to be alert and forward on any evidence of fly-tipping to the council. The Cleaner Brent app allows residents to report litter, dumping, and other problems in streets, parks and cemeteries to the council using a smartphone.

The app allows residents to provide information such as:

- registration of vehicle
- time of incident
- location and description of waste
- description of people dumping the waste
- Pictures, if possible, but strongly warns against confronting suspects

Brent will then arrange for it to be removed and will trace the origin of the waste to identify who dumped it and when. Legal action will subsequently be taken when the offender is identified. It is essential that any evidence passed on to Brent is treated as highly confidential and prevented from entering the public domain. Witnesses who provide it must be seen to be neutral and unbiased.

An assessment of the overall reporting system has been undertaken as part of this review. There appears to be a public perception that, regardless of any incremental improvements delivered by the Cleaner Brent app, it takes too long for the enforcement team to respond to complaints. It is also suggested by residents that enforcement opportunities are not actively followed up.

### **Veolia**

Veolia currently has a nine year contract with Brent Council which began in April 2014 and provides recycling and refuse collections and street cleansing. Veolia clean over 1,700 streets in Brent. Zone 1 roads (usually town centres) are cleaned daily between 7am and 10pm, residential areas are cleaned once a week. Focus is paid to the streets surrounding Wembley Stadium on and after event days. In addition to cleaning the streets in Brent, Veolia also empty over 1,750 on the street litter bins and remove fly-tips. Veolia also operates commercial waste and recycling collection services within Brent and the surrounding area.

How enforcement links in with the new Landlord Licensing scheme has also been assessed. It is hoped that this will be a key part of reducing the issue of IRD in the most overcrowded parts of the borough.

## **7.2. London and National**

Local authorities dealt with a total of 852 thousand incidents of fly-tipping in 2013/14, an increase of 20 per cent since 2012/13, with nearly two thirds of fly-tips involving household waste. This recent increase follows consistent year on year declines in the number of incidents over the preceding years.

A number of local authorities have reported an increase in the number of fly-tipping incidents. Some local authorities have introduced new technologies; such as online reporting and electronic applications, as well as increased training for staff. These authorities have explained this as a factor in the increase in the number of incidents reported as the methods used to publicise reporting and capture data have improved.

Local authorities carried out nearly 500 thousand enforcement actions at an estimated cost of £17.3 million, which was over a £2 million increase on the previous year. This equated to an increase of 18 per cent on enforcement actions over the same period.

- The most common place for fly-tipping to occur was on highways (47 per cent of total incidents in 2013/14)
- Incidents of fly-tipping on footpaths, bridleways and back alleyways increased 15 per cent in England in 2013/14. Together these now account for 29 per cent of fly-tipping incidents
- Approximately a third of all incidents consisted of a small van load of material or less
- The estimated cost of clearance of fly-tipping to Local Authorities in England in 2013/14 was £45.2 million, a 24 per cent increase on 2012/13

### **Legislation and Government Policy**

Section 33(1)(a) of the Environmental Protection Act 1990 defines fly-tipping as rubbish that is illegally dumped on land without permission from landowners or without a licence. It is an arrestable offence with a £50,000 maximum fine or five years imprisonment and any vehicles used in offences can be seized.

### **The Waste Duty of Care**

The waste Duty of Care is set out in Section 34 of the Environmental Protection Act 1990. It exists to ensure that everyone dealing with controlled waste handles it in an appropriate manner to minimise any risks. It applies to any person or business that produces, imports, carries, keeps, treats or disposes of controlled waste (household, industrial and commercial waste) or, as a broker, has control of such waste.

The Duty of Care requires those that deal with waste to take all reasonable measures to:

- Prevent the waste being deposited illegally
- Prevent the waste escaping
- Ensure that waste is only passed to those authorised to receive it
- Ensure that when waste is transferred a written description is completed to ensure the transferee is able to deal with the waste appropriately.

What needs to go into a written description is set out in Regulation 35 of the Waste (England and Wales) Regulations 2011.

Note: Householders have a reduced Duty of Care and do not need to complete a written description when their household waste is transferred. However, they must ensure their waste is only given to someone authorised to receive it.

In October 2015 following calls from the Local Government Association, Ministers announced Defra will introduce an £80 spot fine known as fixed penalty notices for small-scale fly-tipping from spring 2016, to provide councils with an alternative to prosecutions where it is appropriate.



## 8. KEY FINDINGS

### 8.1. Knowledge

#### Understanding

Illegal rubbish dumping is one of the most visible challenges in Brent. It is one of the issues that residents feel most concerned about. It is serious and it is illegal. It is a problem across the borough, London, the UK and cities across the world; this is not just a Brent problem. Some argue that we have become a “throw away” society and the impact of that is seen in our streets, parks and areas of Brent where people think it is acceptable to dump rubbish. Fly-tipping is one of the biggest public service provisions; any rubbish that is not in a bin is considered fly-tipping. This could include large household items left on the street - beds, mattresses, fridges etc. This also could include large loads of rubbish left by businesses, general litter black bags and builders’ waste.

The task group asked Brent residents why they felt people in Brent fly-tip. Many residents commented that this was because “they don’t know any better” and “lack of education around fly-tipping”, or they “do not really understand what fly-tipping is”. It was indicated that residents of flats, rented accommodation (landlords) and short tenancies often have no-one to educate them about how to responsibly dispose of waste. It was pointed out that there are a large number of residents in our borough for whom English is not their first language. The task group recognised that often residents who are new to Brent will dump waste as they do not understand the Brent protocols. It is also cheap for people to dump rubbish and they seemingly do not fear being caught.

#### Behaviour and attitude

The task group found that part of the problem lies in people’s attitude, as proved in a number of industry studies, e.g. *Fly-tipping Good Practice* (appendix 1). Brent has a transient population; with 35,000 rented properties in the borough. Short-term tenants are unlikely to feel an emotional attachment to their area. It was found that there is a possible link between overcrowding and fly-tipping and the council’s House in Multiple Occupancy (HMO) Licensing schemes can provide a means of supporting behavioural change. The task group found that residents who fly-tip develop a pattern and continue to do so, knowing that the council will continue to pick up dumped rubbish. The task group considered how to break this cycle. It was recognised that the council needs to be innovative and try a different approach.

The Brent Waste Management Officers are currently part of a West London Alliance (WLA) tri-borough project with Ealing and Barnet, focusing on behavioural studies to prevent fly-tipping. This involves looking at different approaches such as developing a better sense of ownership for residents. According to the Brent residence survey, 87% of residents say that they want to improve where they live. The Waste Management team, BHP and Mind Space have launched an eight-week trial on the behaviour of residents in tower blocks of flats who use communal bin stores. The trial will see art and murals placed in rubbish sheds. The idea is that residents will think twice about spoiling their lovely environment.

## Working with Others and Benchmarking

As part of the task group's work, it liaised with the Department for Food, Environment and Rural Affairs (DEFRA), as well as the Fly-tipping Prevention Group. DEFRA suggested that the group meet with Kent County Council, who has been successful in working across councils in the UK and with many London boroughs. Kent advised that a large part of their success was found in building good networks and sharing intelligence. This is also evidenced in the *National Fly-Tipping Prevention Group, 2014 Fly-tipping Partnership Framework* (appendix 2). The task group believe that another area for development is improving sub-regional groups and cross boundary partnerships. The waste management team is currently working with a similar group in Hounslow, where they are experiencing similar fly-tipping problems.

Residents also enquired about the number of fly-tipping prosecutions and enforcement actions, as it was felt that such actions sent a strong anti fly-tipping message. While figures were quoted (700 for 2013/14), the task group found that there were many categories of enforcement actions and that this, along with the numbers of actions taken, is not clearly communicated to residents. As part of the review, the task group requested performance data on Brent's fly-tipping incidents and actions, the group was directed to the Environment Agency's "Fly Capture" report (appendix 3). Fly Capture is a web-based fly-tipping database; it enables councils to submit summary data relating to volumes and types of incidents handled. It was found that there were large variances in numbers as to what was deemed as fly-tipping between each council, thereby making it very difficult to benchmark performance.

## **Recommendations**

- The task group recommends that the term "Fly-tipping" should be changed to "Illegal Rubbish Dumping" (IRD) in communications with residents. Residents rarely refer to dumped rubbish as fly-tipping and there is apparently confusion among some residents about what "fly-tipping" actually means. This is not a good basis on which to communicate with residents about the issue, therefore the task group recommends changing the language we use.
- ❖ We recognise that authorities and bodies outside of Brent will, for the time being, probably continue to refer to illegal rubbish dumping as "fly-tipping", so we accept that we will have to use this language when communicating with them.
- A named officer/s within the Waste Management service should be responsible for continuous monitoring of new methods to tackle IRD, keeping the council abreast of the latest developments and leading improvement practices; not just from other London boroughs and the UK, but from Europe and the rest of the world. The task group supports the behavioural studies that the council is currently participating in as part of the West London Alliance (WLA) and recommends that it should continue to build on this area of work.
- Brent Waste Management service should review its internal benchmarking, looking internally at how we monitor our own performance and should report performance quarterly in public. It is recommended that this is communicated to residents and other councillors via the council's website and Brent Magazine.

- Brent Waste Management should liaise with neighbouring London boroughs to develop a benchmarking network. The West London Alliance (WLA) would be a good place to start as there are links already established. There should also be additional cross-border networking, feeding into intelligence with the aim of bringing forward more prosecutions for trade waste dumping.

## 8.2. Education

### Education and Communication

Education and communication is a big part of how the council can tackle fly-tipping. It would be to the council's advantage to strengthen public relations regarding fly-tipping. One of the main contributing factors is behavioural and changing this behaviour requires communication and education which should be on the ground and should involve engaging directly with residents. The task group found that previous fly-tipping campaigns used "wordy" leaflets that people could not relate to. The average reading age of adults in Brent is 11 years old. Communication should be consistent, clear and delivered at a local level to influence behavioural change.

It is a challenge to reach some groups within Brent and it was felt that we should be encouraging neighbours to speak to and educate each other about responsible recycling. In Brent residents tend to think of where they live on the basis of local place names, e.g. place names such as Harlesden and Willesden not Brent. Often an anti-fly-tipping message can be received and understood much better coming from one's neighbours. Where one lives, as well as how and when one's rubbish is collected, is also important. There are differences and we should be careful that residents do not approach their neighbours with incorrect information or in a hostile manner.

The task group heard from residents who expressed concerns regarding the current Brent systems in place for dealing with fly-tipping. Both residents and task group members understand that in the present financial climate, resources are stretched. However, the level of fly-tipping is high and is on an upward trend. If our current methods are not meeting the needs, then we are bound by necessity to find alternative solutions, such as the Keep Wembley Tidy Model (appendix 4).

### New Ways of Working

"Keep Wembley Tidy (KWT) Action Group is a voluntary and non-political organisation that aims to encourage the community; including schools, places of worship and the shops in Ealing Road & Wembley High Road; to work together for a cleaner, greener, safer area in which to live. KWT have over 450 members signed up who are passionate and contribute extensively to raising awareness of illegal rubbish dumping in the community. The group was formed after residents met with local councillors to express their concerns about high level of littering and dumped rubbish on the streets of Wembley Central & Alperton. Since this time KWT has consulted with a number of other groups in Brent, who have similar experiences, to help us improve their knowledge. The group actively engages with Brent Council and Veolia to make recommendations and highlight problem areas and hotspots. KWT objective is to work within the law, to present the issues affecting their community".

*Chirag Gir- Keep Wembley Tidy Coordinator*

It was felt that supporting existing groups was very important and that local ward councillors could find and nominate guardians, working closely with Veolia, running programmes for residents and councillors. Communication and good working links would be vital to ensuring success. Language is a barrier to communication and education, and Brent has a large portion of non-English speaking residents. It is quite possible that many residents do not recognise or understand what fly-tipping is.

Veolia is responsible for educating people on fly-tipping and both residents and the task group feel that this is an area that will make a large impact on tackling fly-tipping. Therefore it is vital to ensure that we work together strategically and that only well thought out targeted messages are delivered. Residents also pointed out that Brent and Veolia should be more visually linked out in the community (more joint branding), as often residents are unaware that Veolia is contracted by Brent. The task group specifically highlighted religious, community organisations and community advocates as a vital link to reaching residents and getting our messages across. Veolia is going out to schools with road shows, but these are the easy groups and we need to tackle the harder groups to make more impact.

Officers discussed the reduction of staff in the trade/business waste team. There is only one officer. The officer makes regular visits and where conditions are breached can fine £300; there is a high turnover of shop ownership in Brent, which does make it difficult to keep track of all the changes. Using new and/or currently organised groups in a structured way with “street watchers or Guardians” could support the council. However, we also need to find the right model that will make it easy with less bureaucracy. The task group very much support developing a model that can be duplicated across the borough, sharing best practice, guidance and support, with additional support from the council.

It was found that it is often difficult for residents who are non-car users to responsibly dispose of waste or take large items or large amounts of waste to a recycling depot. The council does have an excellent special collections service. However, the current collection time wait is 4-5 weeks; at which point, some residents may decide to dispose of these items in a less responsible way. This adds to the issue and more than likely will be picked up by Veolia anyway. Currently Veolia can only pick up 90 items per day. This is clearly not enough to meet the level of demand in Brent. There are many sites like Freegle and Freecycle that will pick up and recycle unwanted rubbish for free. Perhaps there is a way to further publicise these and other such services to residents, through the council website, Special Collection phone-line, community groups and Veolia.

## **Recommendations**

- Constitutionally empower “Community Guardians” by appointing, through an agreed selection process, figure heads like the chair of Keep Wembley Tidy. Councillors can support this by identifying suitable candidates. These guardians are to be given a profile on the council’s web page, support and resources from the council and Veolia; to tackle illegal rubbish dumping in their appointed locations.
- It was identified in the task group’s research that residents often identify with different place names than the wards in which they live. The task group is recommending that the community guardians structure in Brent is mapped in the following village localities and guardians are allocated to these areas:

Wembley	Dudden Hill	Kensal rise
Kenton	Neasden	Stonebridge
Queens Park	Sudbury	Kilburn
Harlesden	Alperton	Willesden

\*This list is intended as a guide and residents are of course free to suggest the names for their own campaigns, as well as the areas these campaigns cover. Keep Wembley Tidy covers Wembley Central and Alperton wards, and it is suggested that campaigns should not overlap with one another. This approach should be integrated with the voluntary Community Action Groups.

- Guidance and a code of practice for the community guardians and village areas should be drawn up and agreed by officers and residents. This should include action days and identifying and evidencing illegal rubbish dumping hot spots. Village websites should also be linked to the council's waste management web pages.
- It will be a priority of the community guardians, councillors, officers and Veolia to devise and produce a 'Brent Against Rubbish Dumping Charter', which Businesses, HMO Landlords and Estate/Letting Agents will be encouraged to sign up to and display publicly.
- It will be a priority of the community guardians, councillors, officers and Veolia to engage with places of worship, youth clubs and sports clubs to engage and promote the Brent Against Rubbish Dumping Charter.
- The process of reporting IRD should be clear and straightforward, so that both residents and officers know what is to be expected and how and when there will be communication between parties. This should be documented on the council's IRD web page.
- Brent waste management and Veolia should liaise with Brent education and Brent schools partnership to ensure that there is a strategic anti-illegal rubbish dumping programme going into schools, aimed at both primary school and secondary school level. The programme should be continuous and target 100% of schools on an annual basis, encouraging schools to sign up to the Brent Against Rubbish Dumping Charter. Progress should be reported on the council waste management web page on a quarterly basis.
- Business liaison should be part of an officer's role; this should include an evaluation of any non-monetary incentives that can be offered. Brent should encourage businesses to sponsor a bin or bins, as a result of which businesses will become certified and will be allowed to display a Brent Council sign stating that they are opposed to IRD.
- Additional resources should be invested in to the Special Collection Service, so that items are collected sooner and the number of bulky items illegally dumped is reduced. Other alternative options for waste disposal and recycling should be promoted with direct links on the council's web page and offered on the phone when residents call to request Special Collection Services such as Freecycle and Freegle.

### **8.3. Enforcement**

#### CCTV

Some local authorities have had success in using CCTV as an effective deterrent against fly-tipping as in the case of Durham County Council (appendix 5), who last year installed additional cameras at various hotspots as part of “Operation Stop It” - their biggest-ever crackdown on fly-tipping - in a bid to deter people from fly-tipping and to provide crucial evidence when prosecuting those who do. In May 2104 Durham were investigating 17 suspected fly-tipping incidents taken from footage using cameras. Since the launch of ‘Operation Stop It Durham’, there has been a decrease in fly-tipping incidents. CCTV was used as an integral part of a wider approach which aims to educate households and businesses of their duty of care when it comes to disposing of waste while taking action against those who flout the law.

The LB of Hillingdon has used CCTV to monitor fly-tipping hotspots for over 10 years and over time enabled a number of prosecutions to take place. These numbers have varied, for example in 2008 there were 23 prosecutions and in 2009 there were 20. These fixed fly-tipping cameras have reduced the amount of fly-tipping in these locations, but have not eliminated it completely.

The number of prosecutions has dropped in recent years and there are many reasons for this, including:

- Offenders conceal their identity, so that visual recognition is difficult
- CCTV images are only rarely useful as evidence without supporting evidence - identification by CCTV image is quite easily refuted by the defence as not being clear enough, especially if hoods or hats are being worn
- Even if a facial image is good, it may not lead to the identity of the offender without additional information such as a registration number
- Vehicles frequently have false number plates, so when we have an image of a registration plate this often does not lead to the identification of the offender
- Fly-tipping occurs in an increasingly wide range of locations such as garages and alley ways and it is not possible to cover all of them with cameras

Brent currently uses its CCTV resources to capture fly-tipping (appendix 6). However, the task group feel that a more strategic targeted approach is needed.

#### Prosecutions

The Brent and Kilburn Times names and shames publicly. This is a very powerful tool. Not every penalty will lead to a prosecution. This will depend on the severity of the offence. The council has an enforcement team which is made up of five officers who are dealing with over 1,000 cases. It is not possible for the council to name and shame until the suspect has been proven guilty in a court of law. If there have been successful prosecutions (7 this year), it is communicated and posted on the council’s website.

In total, Brent dealt with 700 waste enforcement actions across all waste related offences; this included fly-tipping and littering, as well as not having suitable trade waste disposal arrangements in place. Waste enforcement actions – i.e. actions where an enforcement

outcome against an individual or organisation has been achieved based on a proven and/or admitted waste related offence include the issuing of:

- Recorded verbal warnings
- Written warnings
- Simple cautions
- Simple cautions with costs
- Fixed penalty notices
- Achieving a prosecution result in court

In terms of our prosecutions register figures, Brent can only legally publicise successful court convictions— hence the lower figures as these only represent 1 of these 6 actions we can possibly take against offenders.

The prosecutions register figures show that there are 14 successful waste enforcement prosecutions either for dumping, littering or trade waste (Waste Transfer Notes) related offences on the register in 2014. There are a further 12 successful waste enforcement prosecutions for 2013 – most of which are for trade waste offences, however one of them is for fly-tipping. Many of Brent's other successful waste enforcement cases for 13/14, including fly-tipping, did not make it onto the register because they were concluded without court action either through the use of warnings, cautions or fixed penalties - which Brent is unfortunately not allowed to publicise.

The National fly-tipping prevention group and its supporters are seeking to both draw on and influence Government policy and legislation to tackle fly-tipping and empower those involved with taking enforcement action or the administration of justice or deterrents such as sentencing of fly-tipping offences. Government action to tackle fly-tipping is centred on the legislation and functions of local authorities and the Environment Agency and supporting delivery by others. Consideration is also being given to whether the current levels of fines and sentencing are enough to disrupt illegal operations and provide a sufficient deterrent particularly for more serious, persistent and organised waste crime. In addition, work on the effectiveness of the Proceeds of Crime Act 2002 and whether it could be used to better effect is under consideration with the Environment Agency and local authorities;

- Whether successful prosecutions are sufficiently visible and whether magistrates have enough information or training about sentencing for waste crime.
- Whether a fixed monetary penalty could be introduced as a means of dealing with smaller instances of fly-tipping. The Local Government Association, supported by others including the Chartered Institution of Wastes Management, has called for this option to be explored as a potential tool, alongside prosecution, in the fight against fly-tipping.

There is general agreement that the penalties available for fly-tipping are adequate and capable of acting as a real deterrent to offending. The maximum penalties for fly-tipping on summary conviction are a £50,000 fine and/or twelve months imprisonment, and on conviction in a Crown Court an unlimited fine and/or five years imprisonment. However, there is limited understanding of these within the population as a whole. Information about penalties is included on some local authority websites but could be adopted by others. Dissemination by local groups and trade associations would also help. Publicity around successful prosecutions by the Environment Agency, local authorities or others could also help raise awareness that fly-tippers are caught and punished and help deter others from the activity.

The task group learned that all businesses need to have a trade waste agreement/contract; trade waste cannot just be put in a black bag. These agreement/contracts mean that traders have signed up for the waste to be collected and they are issued trade waste bags. But businesses can put out two or three normal black bags along side one trade waste bag, essentially preserving their stock of trade waste bags and having their waste collected for free. Unless there is evidence tying those black bags to that establishment, there is no definite way to prove that business is abusing the system. When traders are found with exposed food waste that attracts vermin or pests, S47 notices were served. Traders then have 28 days in which to comply.

#### House in Multiple Occupation (HMO) Selective licencing

Brent runs three licensing schemes;

Mandatory Licensing Scheme	It is a legal requirement that Houses in Multiple Occupation (HMO's) of three or more storeys occupied by five or more people, making up two or more households must be licensed under the Government's national Mandatory Licensing Scheme.
Additional Licensing Scheme -	It is a legal requirement that all privately rented properties occupied by three or more people, making up two or more households will also require a property licence regardless of the number of storeys in the property.
Selective Licensing Scheme (1 <sup>st</sup> January 2015)	It is a legal requirement that all privately rented properties in the wards of Harlesden, Wembley Central and Willesden Green must have a property licence.

In section 12 “Refuse and Waste “(appendix 7 & 8) of all the Brent licencing schemes conditions, it states;

“The licence holder should provide a sufficient number of external rubbish bins for the occupiers to dispose of waste. They are also responsible for ensuring that any kind of refuse which the council will not ordinarily collect (e.g. large items of furniture, hazardous waste etc.) are disposed of responsibly and appropriately”.

As part of the task group’s work it reviewed heat maps showing prevalence of fly-tipping and HMO’s (appendix 9 & 10). There is not much in the way of noticeable correlation, Mapebury and Willesden Green; where there are high levels of fly-tipping do have high levels of HMOs, however but so does Harlesden, where there are fewer HMO’s<sup>2</sup>. While there is no proven evidence that HMO’s are linked to increasing fly-tipping incidents in Brent. Rental properties in general, rather than just HMOs, are more likely to produce waste as residents move home more frequently than owner occupiers. A particular issue is mattresses, which are commonly found dumped, possibly as a result of being replaced following the change of a tenancy.

The task group believes that this is a missed opportunity to communicate the anti-fly- tipping message and that this section should include further information on Brent’s waste and recycling protocols, including fly-tipping laws and enforcement actions. The task group also found that there are still areas for improving the selective licencing scheme, mainly around

<sup>2</sup> This represents only the licenced HMO’s, there are a large number which remain unlicensed. The fly-tipping location is by street and not the precise spot it occurred.



effective communication. It was found that if landlords lived outside Brent, it was possible they may have not received the information to register or seen the local advertising. There were also issues with landlords not understanding how to register or not recognising that they were indeed landlords; where properties have been sub-let without their knowledge. There is currently further planned work to be done on the communications strategy with a focus on tenants and neighbours, and possible plans for expanding the Brent report app to include reporting HMO's.

The task group were also concerned with the method in which the HMO team are identifying HMO properties. Currently the team use a tried and tested successful formula to identify HMO properties, which includes information from a number of data bases (council tax, benefits, doctors register etc.) and is approx. 95% accurate. The team will then write to the home owners giving 14 days to respond, a second letter is send out if nothing is heard; the team will then visit the property. Members are concerned that this time frame gives "rogue" landlords time to move tenants out and then re-let once the council has concluded its investigations.

### **Recommendations**

- The task group recommends the formation of a strategic approach between Waste Management Enforcement services and the CCTV service to ensure more use of the current CCTV provision to monitor IRD hotspots. It is understood that this will require collecting evidence and providing a supported case for each camera.
- ❖ The task group endorses all of the recommendations on IRD made by the concurrent CCTV task group.
- Waste management services, specifically trade and Environmental health services, must work together more strategically; sharing information and working on joint visits where there is clear intelligence that there are crosscutting priorities.
- A strategic approach between Housing Enforcement and Waste Management Enforcement services via Veolia should be formed to ensure that HMO landlords are educated as to their responsibilities regarding waste disposal for themselves and their tenants.
- Enlist the support of night workers such as black cab drivers and night bus drivers to use the cleaner Brent app and report any perpetrators of IRD. This could be achieved by contacting taxi firms and Transport for London to explain our case and by asking them to cascade our request down to workers. The council would in turn be able to release positive press stories about these organisations.
- We will look to pre-capitalise on new fly-tipping legislation, to be brought forward next year, by following a similar model to Ealing Council, as below:

'The council has teamed up with Kingdom Security to provide dedicated teams of uniformed officers in the borough. Kingdom Security will work with the council's environmental enforcement officers, providing a high-profile deterrent and issuing £80 fines. Operating initially on a one-year trial basis, Kingdom Security is working at no cost to the council. Instead they will take a share of the fines they issue'.

- The council should work with other local authorities and the National Fly-tipping Prevention Group to lobby the Government for more effective enforcement powers.
- The selective Landlord licensing scheme should be reviewed annually and reported on publicly with statistics on how effective the scheme has been, where it has been effective, areas where the council can strengthen its enforcement and any lessons learnt.
- The landlord licensing guidance should have more detail in the wording regarding waste & refuse, so that it is harder for landlords to avoid discharging their responsibilities effectively.
- ❖ The most referenced licensed scheme is that of Newham Council's. Newham's licensing condition in respect of waste simply requires that "No refuse shall be kept in the front or rear garden other than in an approved storage container for that purpose".
- Leaflets about Brent's waste disposal policies should be inserted into the guidance so that landlords can give them to tenants. The leaflet/insert scheme should also be rolled out to estate & letting agents.

#### **8.4. Impact**

Fly-tipping poses a threat to health and safety and domestic waste can attract vermin which spread diseases, something which greatly concerns the task groups. Foxes were cited as a big problem as they destroy black bags and spread rubbish. Brent spent £425,399 on clearing fly-tipping in 2013/14, funds that could be spent on services that are much needed and fundamental to some of our most vulnerable residents. The task group considered the impact of fly-tipping on the reputation and character of the borough and how badly we are perceived. Wembley is a national treasure. However, levels of fly-tipping blight our communities and the reputation of the borough is suffering. Brent is a bright, vibrant and diverse borough, but was recently dubbed as one of the worst places to live in the UK. Whilst we do not accept this characterisation and recognise that particular survey was largely about cost, increasing fly-tipping levels do nothing to help our cause.

The task group held four discussion groups and it was raised on more than one occasion that residents do not want to pay the cost of the garden waste collection. Many residents have expressed that they have seen an increase in the fly-tipping of garden waste. To date, 19,000 Brent residents have signed up to the green waste collection. The task group feels that this should be more widely publicised. The Waste Management team stated that there has been no increase in the tonnage of garden waste and on the streets this is measured visually. The task group felt that this needs to be monitored and measured in a more quantitative method. A report on the garden waste collection service is scheduled to be heard by the scrutiny committee early next year.

## Recommendations

- Further investigation is required into the impact of the garden waste collection charges. Cabinet should review its effectiveness from a cost and efficiency perspective, annually until 2018.
- Owing to the lack of quantitative data to evidence the effects of the garden waste charge at this stage, officers should review and report the effects of its first year in operation. Officers should devise logical metrics against which it can compare its performance annually until 2018.
- The number of Brent residents that have signed up, and continue to sign up, to the Garden waste collection service should be more widely publicised. The Brent website and Brent magazine should be the media for this.

### 8.5. Publicity

Publicity and communication are closely linked and one of the things that residents repeatedly raised at the task group's discussion meetings was the lack of publicity on key anti-fly-tipping information. It was felt that many of the key messages which were recognised as major deterrents were not fully publicised. In all the research the task group reviewed, it found that publicity around successful prosecutions sent a strong message and raised awareness that fly-tippers are caught and punished, which deterred others from the activity.

The Brent 2012 publicity on fly-tipping was raised at the task group discussion meetings. It was felt that that publicity campaign did not reach the ground and was not as effective as it could have been. Residents felt that the tobacco paan spitting campaign was very successful. They felt the campaign was proactive and was spearheaded by enforcement. Once residents knew that people had been caught and been fined, the word spread and people stop doing it. It is the task group's opinion that successful communications are most effective at local community levels.

Many of Brent's tools for tackling fly-tipping are not widely publicised, specifically the Cleaner Brent app. This is an excellent tool and the task group commend the council on this initiative. However, members of the task group and ward councillors found that many residents, including those with keen community interests were unaware of the apps existence. Fly-tipping is such a huge issue that communication and publicity need to be continuous. The Brent Magazine is another of the council's tools which is under-utilised as many residents read and make use of the information provided. This is an excellent medium for publicising quarterly enforcement action statistics.

The KWT model has had much success, but this is not the only way in which current resources can be used in alternative ways. Many local authorities, such as City of Edinburgh Council 2015 project, in conjunction with Zero Waste Scotland (appendix 11), have found the use of social media and other mediums effective as long as the dialogue is kept simple. Very visual and signs can be used. Posters are only one-tenth of what is needed to be done in conjunction with other preventative methods. Our approach needs to be a combination of leaflets, community guardians and social media. In Kilburn and Harlesden, a face to face approach has worked very well.

Another members of the task group stated that often people can speak a language but cannot read that language. It was agreed by all that showing residents via word-of-mouth and face-to-face contact was much more effective than leafleting. Talking to people face-to-face and empowering people and groups in formal structures to work alongside the council is what is required.

### **Recommendations**

- Future publicity about IRD should be continuous, mainly word-of-mouth and not confined to one-off PR campaigns. The last major PR campaign in 2013 involved large, difficult-to-read signs under which rubbish was dumped. It also saw photo opportunities to show the lead member was determined to deal with the issue, but officers confirm that it had little tangible impact on levels of IRD.
- Officers, councillors and community guardians need to visit relevant local meeting places – whether they be religious meeting places, youth clubs or sports clubs – to pass on the council’s messages about IRD and how communities can work with Brent to tackle it.
- Leafleting campaigns led by the council and voluntary groups should be in multiple languages, appropriate to the socio-dynamics of the local area.
- Any future communications should also be easy-to-read with no conflicting messages. This should be backed up with targeted local advertising. Brent London Underground and National rail stations are prime locations for such advertising.
- The Cleaner Brent App requires further publicity, and probably a re-launch, as not enough people are aware it exists. There should be further publicity on the web and in the Brent magazine.

## **9. CONCLUSION**

This review into fly-tipping, or “illegal rubbish dumping” as we are now to call it, has been wide-ranging, exhaustive and thorough. Importantly, it has involved significant public consultation, rather than a simple examination of internal processes. Two members of the full task group are members of the public and they have made extremely valuable contributions. Moreover, we have held several public meetings to engage residents and we have invited contributions via the local press.

This review has been the opposite of a PR exercise and it has focussed on ruthlessly examining Brent’s strategy for dealing with illegal rubbish dumping. The task group concluded that Brent most certainly does have a significant issue with dumping and the council needs to look again at developing comprehensive strategies for dealing with the issue.

This review has set out initial recommendations for developing such approaches, all of which I hope will be adopted. However, this review should only be the first stage in a reworking of Brent’s methods for dealing with what is one of the most serious issues the borough faces. I

hope that this review will go some way towards putting this issue at the forefront of the minds of my fellow councillors and members of staff.

Brent is a wonderful, vibrant, diverse place in which to live and we should be proud of our multi-cultural heritage. We owe it to the decent, hardworking, proud majority of Brent residents to find ways to keep our environment clean and healthy and safe. Brent is a place to which millions of people of all ages flock to see international sport, music and entertainment. We should aim to make those visitors as proud of Brent as we already are.

The clean-up of the Brent that we love is the fundamental aim of all of the recommendations in this report. I hope very much that this aim will be achieved in the coming years.

## 10. PARTICIPANTS, REFERENCES AND APPENDICES

### Participants

London Borough of Brent:	Director of Community Services
	Brent Waste Management Services/Public Realm
	Brent Waste Enforcement Services/Public Realm
	Brent Housing Enforcement Services
Government Agencies	DEFRA
Non Government Organisations	Keep Wembley Tidy
	Brent REACH
Brent Partners	Brent Housing Partnership
	Veolia
Brent Resident Groups	Heather Park Neighbourhood Watch
	Dudden Hill Residents Association
	Sudbury Town Team
	St Raphael's Housing Estate Residents Association
	Vale Farm Residents Association
Other Local Authorities	Kent County Council
	LB Haringey
	LB Harrow

### References

*Fly-tipping: Causes, Incentives and Solutions, A good practice guide for Local Authorities*  
University College London, July 2006

*Fly-tipping Partnership Framework: The National Fly-Tipping Prevention Group, 2014*

*City of Edinburgh Council project, in conjunction with Zero Waste Scotland 2015*

*Durham County Council "Operation Stop It"*

*London Borough of Hillingdon Fly-Tipping in the Borough and the use of CCTV as a method of surveillance, 2004*

### Appendices

Appendix	
1	Fly-tipping: Causes, Incentives and Solutions, A good practice guide for Local Authorities, University College London, July 2006
2	Fly-tipping Partnership Framework: The National Fly-Tipping Prevention Group, 2014
3	DEFRA Fly Capture Data 2013/14
4	About Us: Keep Wembley Tidy Action Group
5	Durham County Council "Operation Stop It"
6	LB Brent Geographical Information System (GIS) CCTV Fly-tipping report
7	LB Brent Selective Licencing Conditions
8	LB Brent Additional and Mandatory Licencing Conditions
9	LB Brent Geographical Information System (GIS) Fly-tipping heat map
10	LB Brent Geographical Information System (GIS) HMO heat map
11	City of Edinburgh Council project, in conjunction with Zero Waste Scotland 2015
12	Scrutiny Fly-Tipping Task Group Terms of Reference