



# A LITTER STRATEGY FOR ROTHER DISTRICT COUNCIL

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## **FOREWORD**

1. Rother District covers some 200 square miles (Corporate Plan 2020) and is a predominately rural district with three main urban areas, Bexhill-on -Sea, Rye and Battle. As well as these historic towns and some of the most beautiful countryside in South East England, the District benefits from a broad range of coastline that attracts many visitors to the main shingle beaches of Bexhill, the famous sandy beaches and sand dunes of Camber Sands, and the more rural beaches of Winchelsea, Pett Level and Fairlight.
2. Reducing litter and improving the management of the litter we do experience, thus minimising the impact on our environment, is an area of great importance and concern to our residents in Rother where our towns and beaches experience substantial increases in litter during the summer season. The Rother Litter Strategy sets out ways to address these concerns and includes peripheral issues such as fly tipping.
3. Rother's beaches and towns together create a thriving tourist destination and for our residents, the District provides the setting for vibrant local communities each with its own unique identity.
4. However, whilst our district ranks well in England for its cleanliness (evidenced by NI195 survey reports), the District's natural beauty and attractive urban environments are sometimes blighted by litter. Furthermore, as a district with a broad coastline and rivers that lead directly into the English Channel, we have a global responsibility to ensure that litter does not find its way into the sea by acting locally to reduce litter in the environment.
5. Dedicated and committed volunteers from our local communities play a big part in tackling litter and the causes of litter. The majority of our residents care very deeply about their environment. However, a small but significant culture persists in believing that littering is acceptable and this needs to be challenged and altered if we are to meet our responsibilities.
6. The purpose of this strategy document is to set out our ambitions and the steps necessary to reduce littering. It identifies the scale of the problem, explains the actions we will take to affect change, and the challenges we face in making those changes. This strategy has been developed in line with the Litter Strategy for England 2017, the Rother Corporate Plan and the Rother Environment Strategy 2020-2030.

## **AMBITION**

7. To reduce the volume of litter in the first instance by reducing packaging through the implementation of the UK Environment Bill new regulations (due in October 2021); to make littering culturally unacceptable behaviour; to ensure we have the right litter bins in the right place to help people dispose of their litter responsibly.

## **THE BACKGROUND CONTEXT**

### **Litter and the law**

8. Litter is controlled under the legislative framework of the Environmental Protection Act 1990, which was amended by the Clean Neighbourhoods and Environment Act 2005.

9. It is an offence to drop or leave litter and not pick it up. It applies to all land that is open to the air, including land covered with water and privately-owned land. A person found guilty of dropping litter can be fined up to £2,500 in a magistrate's court. Most offences can be dealt with through serving a Fixed Penalty Notice (FPN) on the perpetrator by an authorised body such as a local authority or police force. FPN charges are set locally at between £75 and £150.
10. Litter is generally accepted to be anything below the size of a sack of household waste and is mostly understood as items related to smoking, chewing gum or eating and drinking on the move where unwanted items have not been properly disposed of or have been dropped inadvertently.
11. Section 89 of the Environmental Protection Act 1990 (EPA 1990) places a legal responsibility (a 'duty') on certain organisations to ensure that land, as far as is practicable, is kept clear of litter. Section 91 of the EPA 1990 goes on to state that a person who is fed up with a long-standing litter problem can use a Litter Abatement Order against those organisations listed under Section 89 (the 'duty bodies') if they are failing in their duty to keep that land clean.
12. There are six 'Duty Bodies' – local authorities, statutory undertakers such as rail and road agencies, Crown Estate, colleges, schools and universities. Privately owned land not open to public access does not qualify for a Litter Abatement Order.
13. In practical terms local authorities generally find it difficult to issue FPNs as the perpetrator would need to be caught in the act of littering or be able to evidence a contravention of the Act. Some local authorities have used private third-party contractors to patrol high streets to catch offenders in the act of dropping litter but in general this has proved unpopular and unproductive.

## CAUSES OF LITTER

14. The causes of litter are diverse and complex with a lack of, or fragmented data on the impact or importance of each cause and the effectiveness of different approaches to dealing with them. This section of the Strategy, therefore, aims to highlight what the District Council understands to be the key causes of litter.
15. The causes of litter outlined below are not ranked for importance or priority as we do not have evidence on which are the most important. The Strategy will also set out to identify gaps in knowledge and which issues the District has the structures, resources and authority to tackle.
16. Where the Council is not in a position to act directly, the Strategy will outline in what ways it needs to focus on partnership working and community action to secure progress.
17. **Public lack of understanding of the impact of litter:** Despite the high-profile publicity of the impacts of litter on the environment, particularly around plastics, there is still a large disconnect between individual actions and collective impact. There is also a misunderstanding of how and where to use and dispose of biodegradable packaging.
18. **Lack of influence/control/powers:** Whilst there is a perception that the

District Council is responsible for all public land, there are areas where the Council has limited or no powers to act to prevent littering or to provide litter services.

19. **Cultural attitudes:** Our experience suggests that a number of cultural changes have led littering to become an acceptable behaviour. Examples include:
  - The increasing disconnect with the natural environment caused in part by alternative pastimes based around technology.
  - Changes in the way we consume food and drink and move to eating (and drinking) on the go.
  - Increased night-time economy and its impact on less responsible behaviour in urban centres.
  - Increased car ownership and improvements in car design separates travellers from the experience of the environment around them.
  - Expectations of responsibility for litter clearance.
  - Lack of awareness of wider costs of litter.
  - Culture of instant gratification, a compounding factor of eating on the go, the desire to live in the moment means not wanting to hold on to litter until a bin can be found and a reduced sense of responsibility beyond the self.
20. **Eating 'on the go':** With a move to eating 'on the go', there is an increase in disposable packaging. Today, food and drink are consumed in spatially different ways to the past. Under these conditions, it is not always possible to predict the locations for bins to meet the needs of those consumers eating 'on the go' but we do know that it is a problem in beach/seaside locations. Recent years has seen local providers choosing to use large cardboard or polystyrene boxes, rather than paper.
21. In addition, eating 'on the go' packaging often has high volume packaging (plastic bottles and food trays) meaning bins fill more quickly. In Bexhill (seafront) and Camber beach, at times it proves difficult to empty the bins quickly enough; users are reluctant to either crush or tear the containers or take them home.
22. Eating/drinking 'on the go' has also become commonplace whilst driving leading to roadside litter where litter bins may not be an appropriate solution but lead to further littering and fly tipping.
23. **Tourism and Leisure:** Rother is a destination for many types of tourists, largely to enjoy outdoor recreation, historic attractions and our beaches. Whilst this brings many benefits, tourists do not always have access to facilities for disposing of litter in the same way as residents, and it may not be so easy for them to take litter home. Tourism also supports demand for eating 'on the go'. Camber Sands beach is of particular concern as it is a large sandy beach and visitors travel for many miles to get there. There is a risk that any litter left on the beach will be swept out to sea.
24. **Smoking:** Keep Britain Tidy identifies smoking related litter as the most common type of litter found on the streets.
25. "Although cigarette ends are small, by law they still count as litter. Their small size makes them difficult and costly to clean, and also means they are easily

transported to our waterways and coast by wind and water. Not only do they contain toxins which pollute our waters, but they can be mistaken by wildlife for food, which can be deadly. Cigarette filters are not biodegradable. They are actually made of plastic, so they stay in the environment for a long time.”

26. Keep Britain Tidy provides useful data on this issue along with strategies for tackling it which can be explored further.
27. **Dog ownership:** Dogs play an immensely important role in our societies, from support dogs for the disabled, rescue dogs for emergency services and educational dogs for children with behavioural needs, through to companion animals for people of all ages. Dogs promote health and well-being, encourage regular exercise and help break down social barriers. However, dog fouling can cause serious health problems and is the cause of considerable numbers of complaints about street cleanliness.
28. Dog ownership is on the rise and, whilst the failure to clear up dog fouling is increasingly socially unacceptable, there remains a small minority of dog owners that either fail to clear up after their pets or clear up but fail to bin it. Failure to clear up properly after dog fouling causes specific additional concerns around health of people, livestock and wildlife. The problems are exacerbated by lack of clarity as to when, where and how to dispose of dog waste correctly. The problem is far worse in the winter when owners are under the cover of darkness.
29. **Drugs paraphernalia:** A relatively small issue in terms of volume of litter but significant in potential impact on human health, both for the public at large and for staff dealing with the issue. Drug paraphernalia is a difficult problem to tackle at a departmental or even county council level and requires partnership working and lobbying.
30. **Packaging:** Changes in shopping behaviour from high street to online, increasing use of marketing on packaging, use of packaging to increase shelf life of products all contribute to an increase in the volume of packaging and a change in the materials used in packaging. Inevitably, an increase in packaging has led to an increase in waste, whether intentionally or otherwise, some of which ends up as litter. During the pandemic we have seen a rise in cardboard from online deliveries and an increase in fly tipping of it and other packaging.
31. **Long distance transport:** There is a lack of rest facilities for long distance lorry drivers leading to littering of major laybys in the county. Challenges exist for such locations as bins in these locations attract fly tipping, misuse and abuse.
32. **Schools:** Walking routes to schools attract litter as many children eat on the go both to and from school. It only takes a small minority to drop litter on a daily basis on the same routes for litter to become a problem in these areas. The cohort effect makes challenging behaviours an ongoing requirement in an already highly pressured educational curriculum.
33. **Commercial and household waste collection:** Recycling targets put pressure on waste collection services. Whilst waste segregated by residents at the kerbside is widely seen as improving the quality of the recyclable

materials collected, the logistics of this approach can lead to the creation of litter. Example problems include historic urban areas (Bexhill, Rye and Battle town centres in particular) with houses in multiple occupation lacking in space for bins; households in converted properties above retail units not equipped to store multiple bins for waste segregation, and sometimes lack of knowledge regarding waste collections due to high turnover of occupants.

#### **WHERE ARE WE NOW**

34. In the UK the cost of dealing with litter is around £850m a year (Litter Strategy for England 2017) and whilst the types of litter have changed, the level of litter has not fallen for over 12 years. Fast food litter has increased over the last decade as people have taken up the habit of eating and drinking on the go. Litter can last a very long time in the environment, with some materials such as crisp packets, cans and glass bottles remaining intact for decades, and plastic bottles having a 'life' of hundreds of years.
35. England released a national strategy for litter in 2017 that includes a combination of education, enforcement and improved infrastructure.
36. The coronavirus pandemic, anecdotally, has made the litter problem worse; more people are enjoying outside spaces, more people are shopping online for goods, restaurants are closed and consumer takeaway food and beverages has increased.

#### **SCALE OF THE PROBLEM IN ROTHER**

37. Rother District is an area covering approximately 511.8 km square (Rother in profile 2006) of mostly high-quality rural landscapes and villages with many protected environments that are highly valued by local communities. These beautiful towns, villages and rural landscapes also contribute to the local economy by attracting tourists to the region. Litter has a negative impact on the built and natural environment and, ultimately, has a negative impact on the economy, wellbeing and safety of the people and wildlife.
38. Rother's litter is easily transported by wind or water to other places where it can do unseen damage such as in rivers and seas. There is a great deal of international concern about the sheer volume of plastic litter that is now entering our oceans and the difficulty in removing it. In addition to the obvious dangers to marine life, it is a hazard to the food chain, and assists potentially invasive species to travel around the globe, destroying habitats, threatening species and harming human health.
39. Rother's litter problem is a very visible manifestation of some people's lack of awareness and care for the local environment. Yet for others, it remains one of the issues that they care very much about.
40. Whilst the figures show that street cleanliness is generally good, (NI195 data year ending August 2020 indicates litter/detritus of around 4% in areas surveyed) there are still problem areas and issues that need to be tackled. With the current and ongoing constraints on resourcing there is a need to work more efficiently, particularly if we are to curb the recent fall in performance and to deal with changes in culture that are leading to new litter related challenges.

## **SPENDING ON LITTER COLLECTION IN ROTHER**

41. Considerable financial and man power resources are dedicated to collecting litter in the streets, emptying litter bins and litter picking along country lanes. The budget for 2021/2022 is £1.1m for beach and street cleansing which includes the collection of litter.
42. The clearance of litter is an avoidable cost but to reduce this requires significant culture change alongside well designed and planned infrastructure and services to meet current and future needs. Changing culture is challenging and requires ongoing investment in education, engagement and, occasionally, enforcement. Given that much of our infrastructure is old and designed and planned for a different time, updating this to meet current and predicted need in the current economic environment will be a challenge and new and innovative ways to deal with this will be necessary.
43. The Council engages a Waste Contractor, Biffa, to keep the streets, roads and beaches clean. Furthermore, dedicated volunteers regularly litter pick in the areas where they live, some of whom will also separate materials into recyclables and waste. Volunteers in rural areas carry out cleansing where it is difficult for the District Council to do so due to a lack of resources, and volunteers are often able to undertake additional regular deep cleans of their local area.

## **LITTER PREVENTION**

44. There is little education and prevention work. Currently very limited work is undertaken but there is room for improvement working with the general public on raising awareness about litter. East Sussex County Council's Communications Team have embarked on an anti-littering campaign focusing on the message 'respect, protect, enjoy.' These messages will be shared across social media platforms. The Environment Bill will tackle the root sources of packaging and Rother has taken part in the consultation process to ensure our concerns are heard. Councillor and Environmental groups have been working to persuade fast food outlets to switch to more environmentally friendly forms of packaging.
45. The Litter Strategy for England 2017 places great emphasis on working together to reduce littering. Litter is everyone's responsibility from retailers who provide take-away food, residents who allow their dogs to foul and members of the public who think it is socially acceptable to drop their litter for someone else to clean up.

## **WHERE DO WE WANT TO BE**

46. Feedback from Councillors, community groups and individuals and other stakeholders has made it clear that we want a cleaner district. Our ambition is: To make littering unacceptable behaviour and to seek new and innovative ways to reduce littering and to clear it promptly where it turns up. To achieve this ambition, we have reviewed our approach to dealing with litter and set out an action plan to help us achieve this.

## **OUR APPROACH**

47. Rother District Council will adopt a positive collaborative approach to tackling litter in the District. In response to views from our stakeholders, we have identified five thematic areas of work to tackle the many and diverse causes of litter that build on current practice and on which an action plan (set out in

the Appendix) has been developed. The five thematic areas of work are: Education; Enforcement; Infrastructure; Service design; and Partnership working.

48. The Action Plan will be underpinned by the best available data. Where gaps in the data exist or where data is scarce, we will work with our partners to collect and analyse data to underpin our approach.

#### **FIRST STEPS - REVIEW OF OUR BININFRASTRUCTURE REF: WASTE & RESOURCES ACTION PROGRAMME (WRAP) GRANT FUND FOR LITTER BINS**

49. For the purposes of applying for the WRAP grant, we chose to focus on having the 'right bin in the right place'. As Rother is geographically large and spread out, we have narrowed our focus further to two of our busiest areas, Camber Sands (and associated beaches) and Bexhill Seafront.
50. Camber Sands alone can attract up to 10,000 to 15,000 visitors a day on warm summer days, and as many as 25,000 people a day on hot weekends and bank holidays. In the current COVID situation and the 'stay-cation' in 2020, Rother received unprecedented numbers of visitors to both Camber and Bexhill and so the grant application was based on planning for similar unprecedented levels in 2021.
51. Litter is a seasonal issue in these areas and increases exponentially in line with visitor numbers, with the risk that any litter left on the sands and shingle will be washed out to sea or blown about in the wind. Visitors at both locations will often stay for the day, bringing their own food with them or purchasing take-away food to consume on the beaches. The resulting rubbish is then left by the nearest litter bin or in situ on the beach to be blown about the beaches and promenades and sometimes washed out to sea.
52. Officers reviewed the 'bininfrastructure' at both locations and successfully applied for a WRAP grant of £22,500 to install new litter bins and two solar compaction bins in certain locations.

#### Camber Sands

53. Camber Sands is a sandy beach and a SSSI site. There is a small village of approximately 1,000 residents. There are three car parks and limited on street parking due to the narrow road in and out of the village. The beach needs to be cleansed throughout the day during high season. Fixed bins are not an option on the sands as they do not stand up to the shifting grounds, tides and weather conditions. Following research and looking at the experiences in Bournemouth, Brighton and Hastings, robust fixed bins are required on the entrances to the beach, car parks and village. In addition to this, bulky bins are needed on the sands. Our current stock is in need of replacement and this has now been done as at October 2021.

#### Bexhill Seafront and Herbrand Walk

54. Areas of these beaches are heavily used during the summer and we expected visitor numbers to increase in the future. As a result of this strategy and the funding additional bins are now in place near to take-away food outlets along the seafront and on the shingle beaches at Herbrand Walk. In addition to these bins we have purchased and installed two solar compactor bins for



installation at a prominent spot along the seafront near the take away outlets and at Herbrand Walk. These bins, which are now in place as at October 2021, compact the litter and should be a talking point in the town with visitors keen to use them.

55. The existing bins will be repaired and refurbished and redeployed as part of the next phase of ensuring the 'right bin in the right place'.

## SECOND STEPS – USE THE TOOLS WE HAVE

56. Make use of our existing tools such as the 'report it' function on the website.
57. Publicise the 'report it' function and encourage residents to use it: this will give us valuable data and ensure that we can direct resources to hot-spot areas

## STRATEGIC ACTION PLAN

### Action Plan Overview

58. The below is a table to highlight relationships between issues and how they might be tackled.

Thematic area of work	Education	Enforcement	Infrastructure	Service Design	Partnership Working
<b>Causes of litter</b>					
Public understanding of the impact of litter	x				x
Lack of an updated county strategy for litter					x
Changes in culture	x	x	x		x
Eating on the go	x	x	x	x	
Tourism and leisure			x	x	x
Smoking related litter	x		x		
The impact of dog ownership	x	x	x		x
Packaging					x
Long distance transport			x	x	x
Schools	x		x		
Waste collection services			x	x	

### **Education**

Develop an education plan for residents and visitors about the impact of litter. To cover:

- Social media campaigns on particular timed themes, dog fouling, waste and recycling (what can be recycled) and how to reduce waste overall.
- Work with local schools and community groups.

### **Enforcement**

- Crack down on fly tipping, both the commercial fly tips plus the domestic fly tips especially at bring sites.
- Work with enforcement on targeted campaigns, publicise FPN and issue appeals for witnesses with large commercial fly tips.
- Work with other districts, county and police to gather evidence against repeat offenders.

## **Infrastructure**

- Review our current 'binrastructure' to ensure we have the right bin in the right place.
- Implement innovative designs of bins to make them easy to use.

## **Service Design**

- Work with Biffa to ensure that as many households as possible are on alternate weekly collections and identify ways that daily collections can be avoided.

## **Partnership Working**

- Identify community groups to work with in promoting key messages about litter prevention.
- Work with community and voluntary groups to organise regular litter picks and beach cleanses and to identify hot spots and changes to 'binrastructure.'
- Promote partnership working amongst local businesses for litter prevention.
- Recognise and reward the contribution of volunteers to tackling litter.
- Consider Quality of Place awards.

## **FUNDING**

59. As previously mentioned, to support the Rother Litter Strategy officers were successful in applying for grant funding from WRAP organisation in May 2021 to provide litter bins to the value of £22,500.
60. Further financial support to pay for the emptying of these additional litter bins has been supported by Hastings Direct and via the Welcome Back Fund.
61. It is proposed that further funding may be obtained through local businesses sponsoring litter bins as a means of advertising and to support culture change.
62. We would also look to fund local educational and publicity campaigns using business sponsorship and link this to the UK Environment Bill when it is ratified in Autumn 2021.

## **SUMMARY**

63. This Strategy builds on the work undertaken by Central Government and relies on partnership working with Parish and Town Councils (P&TC), community groups, businesses and individuals. We will be consulting with P&TCs about their 'binrastructure' and encouraging them to create their own litter strategies.
64. It is considered the first priority is to change people's attitude towards their use of packaging and reduce the amount of materials they use and subsequently discard.
65. The second priority is to change people's attitude towards littering being something we simply have to accept and pay to remove, by changing the culture.
66. Both the above priorities will take time to effect and, in the meantime, it is important to have in place an effective litter strategy to both manage the impact of the existing issues and work to support the above changes.

67. Officers look forward to working with Councillors, community groups and individuals to further develop and implement this strategy, and to build on their valuable work already in progress across Rother.

DRAFT

### **Below is extracted detail of the WRAP 'Binrastructure' grant application:**

In line with the guidance officers have included a 'Binrastructure' section within the draft litter strategy, to audit where the bins are across the District, and assess suitability for the location and main use. The audit covered:

The type of bin (physical characteristics) including make, model, capacity, aperture and fixings

- Location
- Target materials
- Owner and who is responsible for emptying
- Access
- Condition
- Signage

The information on usage and location in particular, determined our focus areas, i.e. hotspots. All bin locations and make and model of bins have been mapped on a software package. This work started at the beginning of 2019 and concluded in September 2020. The next step is to audit and assess the level of use for each of bin, the type of bin for the location and target materials. However, as this will need to be an ongoing project, it was agreed to prioritise the areas with the greatest need.

Looking at the data available from customer complaints, reports from members of the public on bins that need emptying, feedback from Cleansing Operatives, waste contractors and District Compliance Officers, the District's most popular beach and seafront areas were identified as a priority.

Identification of litter prone/hotspot locations: Camber Beach, Broomhill, Winchelsea Beach, Pett Level Beach and Bexhill Seafront were identified as hotspots. 2020 was a particularly bad year for littering in these locations due the COVID-19 pandemic and the vast increase in visitor numbers. Meetings have taken place with the District Coastal Team, Rother District Council Officers, Biffa and local representatives, to review the bin locations and emptying frequencies based on the 2020 summer season. A copy of the minutes of the last three meetings are available.

Type of locations: All locations across Rother were assessed at a very high level. It was readily agreed to prioritise the locations with the highest number of visitors (footfall) namely Camber and associated beaches and Bexhill seafront. These were the areas easily identified as having the greatest requirement for action. These are tourist hotspots and beach/see locations.

Prioritisation of target locations: The beach and seafront areas were prioritised because of the large amount of litter to be collected, to protect the tourist industry/economy, the threat to the environment (litter being swept into the sea) and the cost (financial and environmental) of the need to empty bins and pick litter.

Locations: Camber and associated beaches and Bexhill seafront were chosen, due to the extremely high level of visitors (£25,000 a day at Camber alone.) During the summer months (and as early as Easter and until October) the beach and seafront areas are extremely busy with holidaymakers and day tourists. They create an exceptional amount of litter and logistical planning (for Camber) in how to contain

and collect the litter.

How the project is aligned with the findings of the litter strategy and RBRP guidance principles: The litter strategy seeks to understand the causes of littering and how to deal with it. It covers public awareness, training, advertising and working with partners. It also seeks to understand if the District has the right infrastructure and is installing the right type of bin in the right location. It seeks to identify a more efficient way of tackling littering in the area.

Details of bins: The beach areas of Camber, Winchelsea Beach, Pett Level beach and Broomhill, are quite difficult terrains. Weather can be unforgiving with high winds blowing the sands causing damage to less robust bins. The sands shift daily and bases for the bins can't be fixed on the dunes. For these areas, from research (WRAP guidance, case studies, previous experience) it has been decided to purchase sturdy concrete bins that will be fixed in the car parks and entrances to the beaches, in the highest footfall areas. This will also assist in emptying. The bins chosen are 168 litre glass reinforced concrete litter bins with galvanised steel liners. The installation costs (not part of the application) are higher than other bins as a crane is needed. However, these bins withstand poor weather, high usage and are easy to maintain and hard to vandalise. We have trialled three of these bins in our beach areas and they have proved successful. The apertures are slide out lockable doors and it will be litter only (not recycling.) We have also costed for additional signage to direct people to take their litter off the beach and deposit in the bins at the entrance.

On the seafront at Bexhill we would like the same concrete bins plus two solar compactor bins. We have not tried solar compactor bins but research on the experience of other councils is positive. We would like to install two on an area of high use on Bexhill seafront, opposite a line of take-away food outlets. These food outlets produce a high number of boxes that cause our traditional bins to become full very quickly. The compacting element of the bins should help with fitting more into each bin. The capacity is 150 litres and it will be litter only (not recycling.) They are made from galvanised steel with slide out lockable doors of flap depending on model.