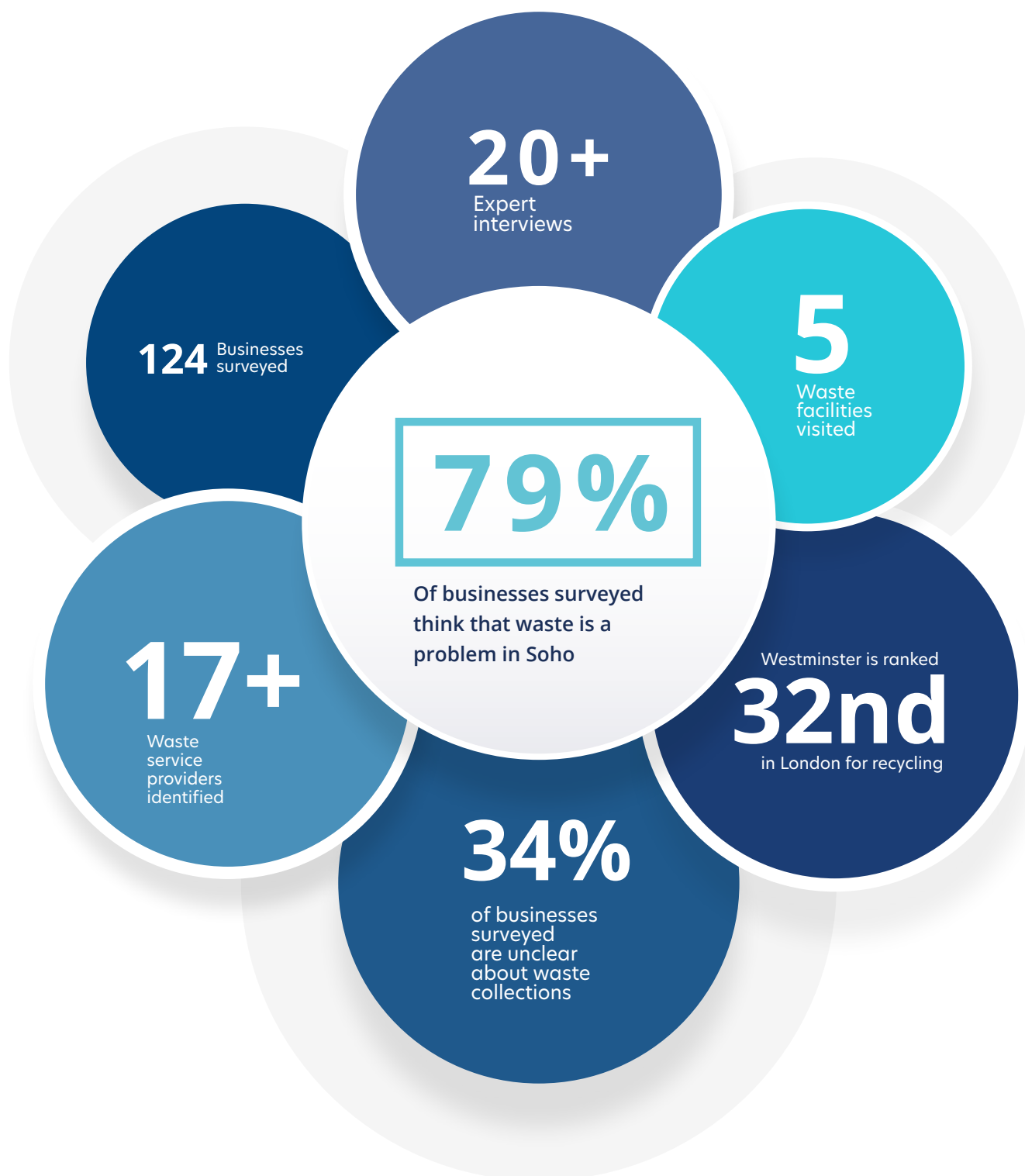


SOHO COMES CLEAN



**A report on the issue of
street waste in Soho**

produced by
Orbitl + Crystal Associates
on behalf of the
Soho Neighbourhood Forum



Disclaimer:

This report has been prepared by Orbitl Limited and Crystal Associates Limited ("OCA") for the use of the Soho Neighbourhood Forum (the "Client") in accordance with generally accepted consultancy principles and the terms of reference agreed between OCA and the Client. Any information provided by third parties and referred to herein has not been checked or verified by OCA, unless otherwise expressly stated in the document. Where the conclusions and recommendations contained in this document are based upon information provided by others it is on the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. The methodology adopted and the sources of information used by OCA in providing its services are outlined in this document. The work described in this report was undertaken in the period from September 2021 to February 2022 and is based on the conditions encountered and the information available during the said period of time. The scope of this study and the services are accordingly factually limited by these circumstances.

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Executive Summary

The brief

"To review, investigate, analyse and make recommendations on current waste management practises in Soho, with the twin objectives of changing public behaviour to reduce waste left for long periods on streets and optimising refuse collection movements, with a view to improving air quality and reducing congestion in the neighbourhood."

The project focused on a sample area bounded by Wardour St to the West, Soho St/Frith St to the East, Oxford St to the North and Old Compton St to the South, including the 'extensions' of Dean St, Frith St and Romilly St.

The methodology

The project team adopted a data-driven approach in order to quantify and qualify the nature and extent of the 'problem' and accumulate a body of evidence that could be used to support potential solutions. Over 5 months, we engaged with around 130 businesses, large and small, comprising the key sectors of Hospitality, Retail and 'Other', as well as residents of Soho, through Focus Groups, In-Depth Interviews, a Quantitative Business Survey, and a Street Waste Survey, as well as desk-top research including reviewing the Soho Neighbourhood Plan.

Key findings

Our work confirmed that:

- Almost **80% of businesses agree waste is a problem** and that hospitality businesses are primarily responsible
- Around **130 tonnes of waste** is generated in Soho every day
- **Most waste on the streets is within the rules** but fly-tipping is an issue
- **Recycling in Westminster is low** but businesses are trying to do the right thing
- Electric vehicles are starting to be rolled out but **further infrastructure is required**
- At least **17** waste providers operate within the focus area
- Current collection times may be **incentivising poor practices**
- **More positive engagement is required** between the Council and local businesses

A Cleaner, Greener, Healthier Soho: Key recommendations

We identified 18 recommendations requiring implementation over the next two years to resolve the problem of waste and ensure 'A Cleaner, Greener, Healthier Soho'. The first 11 recommendations focus on removing waste from Soho's streets, the other 7 on reducing the production of waste in the first place.

The majority of recommendations will need to be implemented by Westminster City Council, but with the support and collaboration of the Soho Neighbourhood Forum (particularly the proposed SNF Enforcement & Engagement Officer) The Soho Society, Soho Business Alliance and other partners. 17 good practice or 'spotlight' case studies have been highlighted to support the implementation.

Our recommendations are divided into two groups. The first group includes solutions that would directly reduce the amount of waste on Soho's streets:

A1. Employ a Waste Engagement and Enforcement Officer for Soho

A2. Install cost-effective, fibre-optic connected CCTV at key fly-tipping trouble spots

A3. Conduct a review of routes and timings, including the possible abolition of one of the collections, or its replacement with a dedicated recycling collection

A4. Embark on an education campaign to deter fly-tipping and encourage more recycling

A5. Make customer-specific QR codes on waste and recycling bags mandatory for waste collection companies operating in Soho (or preferably Westminster as a whole), to allow traceability and identify non-compliant businesses

A6. Identify small-scale/'mobile' consolidation points, to be fed by hand-drawn carts/electric bikes

A7. Look to reduce the number of waste providers

A8. Introduce Consolidation points in strategic spots

A9. Continue the roll-out of electric vehicles to 100% (eRCVs, cargo bikes, etc)

A10. Introduce smart bins

A11. Promote the use of an app (existing or new) to support the reporting of waste issues

The remaining recommendations are either longer-term, or will have an indirect impact on waste in Soho by reducing the amount of waste that is produced overall in the area:

B12. Review the BID model and assess whether appropriate for Soho, with the aim of ensuring better overall management

B13. Undertake a Land Registry check to identify all current property owners within Soho with the aim of improving collaboration on matters such as waste

B14. Set up water bottle refill stations

B15. Encourage the use of reusable cups

B16. Encourage more reuse/repair

B17. Encourage the use of food sharing across Soho

B18. Encourage the use of sustainable packaging

We believe that these findings and recommendations constitute a significant step towards making Soho a cleaner, healthier place to live and work, and we look forward to discussing them further.

Orbitl + Crystal Associates

What does Soho mean for you?

During the course of our research we asked what Soho means to people who took part in our survey or attended a focus group.

The word cloud below illustrates responses to the question, **"When you think of Soho, what is the first word that comes to mind?"**



INTRODUCTION

The Brief

"To review, investigate, analyse and make recommendations on current waste management practises in Soho, with the twin objectives of changing public behaviour to reduce waste left for long periods on streets and optimising refuse collection movements, with a view to improving air quality and reducing congestion in the neighbourhood."

Background

Originally conceived by the Soho Business Alliance (SBA) as **"an urban planning and feasibility study to determine the economic and environmental benefits for businesses and residents of Soho of introducing technology-enabled, zero-emission waste collection services in the area,"** the gestation of the project began in March 2021.

Given the need to address the concerns of all stakeholders in the area, oversight of the project was adopted in July by the Soho Neighbourhood Forum (SNF), whose membership includes both residents and businesses, and whose Soho Neighbourhood Plan 2019-2040 had by that stage passed all stages of public consultation and was due to go to referendum on 2nd September. Rather than confine the proposed study to any one predetermined solution, SNF proposed the more wide-ranging brief detailed above, with specific tasks including: i) Engaging with leading property owners to enlist their cooperation and support; ii) Surveying visually to specify locations where waste is repeatedly left on pavements for long periods of time, and mapping these; iii) Identifying at each location, where possible, what type of waste is present (household, commercial and/or other); iv) Using the steps above to make the case for installing appropriate bins or other infrastructure, both on- and off-street, to house the waste/recyclables until collected; v) Reviewing the street by street collection times with Westminster City Council (WCC) officers, to see whether these should be updated and streamlined.



Proposal and Approach

Our project proposal was submitted to SNF in July 2021. Below is a summary of the proposal and the approach outlined, as well as some adjustments we have had to make during the course of the project, due to the ongoing pandemic.

Phase One:

1.a. Hold initial kick-off meetings with key stakeholders including SNF, The Soho Society (TSS), SBA and WCC, to agree scope of work, sharing of data and other relevant matters.

Our kick-off meetings with SNF and TSS were held on 21st September, with WCC on 4th October and with SBA on 22nd October.

This was against a background of Covid lockdowns and restrictions, staff shortages due to illness and Brexit, vacant shops and offices, and al fresco dining. In addition, there was some progress on the waste front, such as the introduction of electric vehicles on the streets of Soho, and “an increased focus on waste enforcement” with “overall waste enforcement action increased by over 300%” over the last few months of 2021, according to WCC.

1.b. Review and establish the quality of existing data held and identify gaps to be filled

For the project we reviewed a variety of studies and related documents, including the Soho Heritage and Character Assessment Report (August 2018), the Soho Neighbourhood Plan 2019-2040 (September 2021), the East Mayfair Commercial Vehicle Reduction Programme Evaluation Report (February 2020) and the WCC Freight, Servicing and Deliveries Action Plan 2020-2040 (May 2021).

We also found that SNF and TSS had done a great deal of work on the waste issue over the years, including a survey of people living and working in/visiting Soho in 2017 that included a section on waste. But there was very little, if any, official data focused on Soho.

1.c. Design and carry out mixed-method qualitative research/interviews among businesses and residents (and potentially, visitors) to determine current attitudes/behaviours, costs and barriers/openness to change.

We held six Focus Group Discussions (FGDs), with residents and owner/operators of Hospitality, Retail and ‘Other’ businesses during the course of October and November, and conducted 20 In-Depth-Interviews (IDIs) during the course of the project. The findings of these were incorporated into the design of a quantitative survey of business owner/operators, which was rolled out in December and January, the results of which are highlighted throughout the report.

1.d. Engage with property companies and local authorities to request access, where possible, to existing CCTV footage, to analyse 24-hour waste disposal activity.

Although London is said to be one of the most monitored cities in the world it soon became apparent that this does not apply to Soho and we were thus unable to utilise CCTV footage as part of the study.

1.e. Supplement said footage with on-the-ground surveying of central Soho streets, from Wardour St to Frith St/Soho St and Oxford St to Old Compton St, to identify and map problem areas - including smaller streets, alleys and mews - as well as types and sources of waste. Data to be gathered using a suitable mobile and desktop app, with oversight dashboards.

During the course of December and January we recorded the names, addresses and primary business sectors of a total of 358 businesses in our target area, of which 162 were Hospitality Businesses, 51 Retail and 145 Other. We also conducted a systematic survey of key locations to observe waste dynamics, and details of this survey are contained in this report.

1.f. Conduct a review of comparable schemes, regulations and best practices in the UK and internationally, identifying suitable applications to the Soho context.

As became increasingly apparent during the course of the project, Soho is rather unique, even in the local context. Nevertheless, we have identified and laid out a number of comparable schemes and good practices as well as regulations, both existing and upcoming.

Phase Two

2.a. Consult with the relevant authority, WCC, and waste disposal providers, Biffa and Veolia, to present initial findings and gauge their willingness to support potential solutions, such as changes to collection facilities, times, routes, vehicles, etc.

WCC have confirmed their support to consider proposals if there is a consensus among the residents and businesses of Soho. We also received positive feedback from Biffa and Veolia, as well as other waste disposal providers we spoke with.

2.b. Organise roundtable discussion with stakeholders including businesses, residents and property owners, to discuss initial findings and outcomes of the above discussions

Due to COVID and restrictions on people's time and availability we have sought continuous feedback from certain stakeholders throughout the course of the project. We also presented initial findings to the Steering group on 16th of February, with a follow-up on 23rd of February.

2.c. Additional data analysis and modelling.

We have performed additional analysis of the data collected from our survey and other sources, and where this produced meaningful insights these are included in the thematic sections of this report.

Phase Three

3.a. Presentation of recommendations (including behavioural 'nudges' – both 'carrots' and 'sticks', as well as guidance on who and how to use them – to increase the effectiveness of messaging and training materials) and workshop.

At the time of writing, it had not been possible to organise the aforementioned workshop, for reasons mentioned previously. Recommendations and messaging guidance are detailed elsewhere in this report.



Geographic Scope

On the right is a map of the approximate area covered by the Soho Neighbourhood Forum. This is known as the **Soho Neighbourhood Area** and was designated by Westminster City Council on 5 April 2013.



Given limited budget and the need to delve deeper into the issue than previous studies within a limited timeframe, it was agreed that the project would focus on a sample area bounded by **Wardour St to the West, Soho St/Frith St to the East, Oxford St to the North and Old Compton St to the South** (see map right), in order to ensure a representative mix of larger and smaller streets, alleys and mews, as well as a suitable mix of businesses large and small, comprising the key sectors of Hospitality, Retail and 'Other', as well as residential properties.



During the course of the project, the decision was taken to include the southern extensions of Wardour, Dean and Frith Streets, the eastern end of Old Compton St, and Romilly St within the scope of our street mapping and surveying work.

RESEARCH METHODOLOGY

Working on the premise that you cannot manage what you do not measure, the project team adopted a data-driven approach in order to quantify and qualify the nature and extent of the 'problem' and accumulate a body of evidence that could be used to support potential solutions.

The initial phase of the project involved two complementary streams of research. The first involved detailed background research on current regulations and urban planning policies as they relate to Soho. The second involved primary qualitative and quantitative research conducted by the project team that gathered opinions from the target groups (Retailers, Hospitality businesses, "Other" businesses, and Residents), as well as a forensic, street-level survey of waste left on pavements over the course of a 30-day period, recording times, locations and nature of the waste present. The latter activity also provided ample opportunity for engagement with street cleansing and waste collection officers, yielding an additional layer of insight, as outlined below.

Background Research Overview

Our team reviewed data provided by the UK's Department for Environment, Food and Rural Affairs (DEFRA); The Soho Society (TSS); Westminster City Council (WCC); the Greater London Authority (GLA); and several of the waste management service providers active in Soho, as well as other public and private sector bodies involved in waste management in Soho and elsewhere. We also conducted semi-structured interviews with representatives of waste management providers, property management companies and the local authority.

These sources provided valuable information ranging from micro-level data about current waste collection practises in our target area to national-level policies regarding waste and the environment, and this information is included in this report wherever appropriate.



Primary Research Overview

The project team conducted a series of **nearly 30 in-depth interviews and focus groups** with representatives of our key target groups, as well as a quantitative survey of street-level businesses and a systematic survey of waste dumping in key locations.

Focus Groups and In-Depth Interviews (September-October 2021)

During the initial stage of the project, the team conducted **6 focus groups**. Each group focused on a different target group, with 2 groups for residents, 2 groups for hospitality businesses, and one group each for retail and “other” businesses. The format of the groups was a 1-1.5 hour semi-structured discussion, which covered topics including the nature of the waste problem in Soho, who is responsible for creating the waste, who should be solving the problem, participants’ current procedures for dealing with waste, and examples from elsewhere in the world of innovative practises. The overall purpose of these groups was to frame the problem space and understand how participants currently feel about waste, as well as identifying potential barriers to engagement with current and future waste management initiatives.

We also conducted a series of interviews with representatives of the key groups to enable a more in-depth understanding of personal views and to enlarge our pool of opinions.

Quantitative Business Survey (November 2021-January 2022)

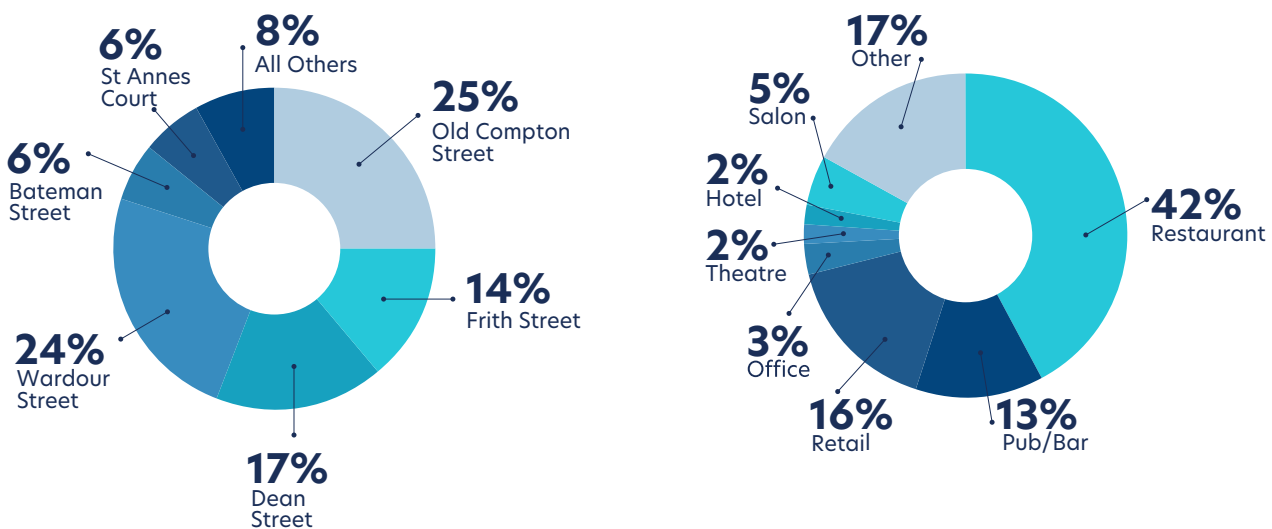
Building on the initial insights gathered during the initial qualitative phase, our team conducted a quantitative survey of street-level businesses over a period of 3 months.

We chose to focus on street-level businesses due to a perception that they are the primary producers of waste in the area, as well as logistical difficulties in surveying businesses without street frontage during a period when government advice told most businesses to implement ‘working from home’ practies due to coronavirus.

We collected a total of **124 responses, representing around a third of the businesses in our target area**. Responses in almost all cases were collected via face-to-face interviews, though a small number of respondents were provided with a web link to allow them to take the survey in their own time.

To ensure that our sample was representative, **we also built a list of all businesses in the area that could be identified by signage.** Our list included the business' name, address and primary business sector. Based on comparisons of the data we collected in our survey with our list of all businesses, we are confident that our quantitative survey constitutes a robust and representative sample and that conclusions drawn from the survey data are valid.

The charts below illustrate the composition of our quantitative sample by street and business type, and each potential value is represented in our sample in proportions that are very close to those of the sample frame:



Street Waste Survey (December 2021-January 2022)

For our direct observation exercise, we identified a selection of sampling locations that include the four main arteries of the area (Wardour St, Dean St, Frith St and Old Compton St) and several connecting streets and alleyways. This area was identified by SNF as being representative of wider Soho for several reasons, including narrow streets, high footfall, heavy vehicle traffic, high visibility to tourists, a blend of business and domestic demand, and dated infrastructure.

As a team, we spent hundreds of hours on the streets of East Soho. **The route was walked well over 50 times, and at various times of day and night.** As well as many ad hoc visits to the streets included in the sample area, the route was walked and photographed by the same member of the team at different times of the day for 20 days, making sure that the busiest parts of the route were monitored every day and at all feasible hours. The weekdays of Monday to Thursday were found to be quiet, and with much reduced footfall especially between 7am and 10am, so were monitored less. The most impactful information was gathered in the afternoons, evenings and at weekends, so we also included monitoring hours of activity into the late night / early hours, and as footfall increased again mid-morning. We delayed this monitoring until as late in the project as possible, to mitigate biases that could arise from atypical public behaviour patterns resulting from Coronavirus restrictions.

NATURE OF THE PROBLEM

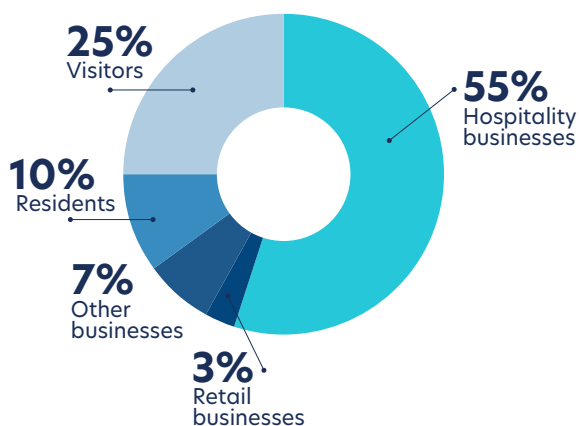
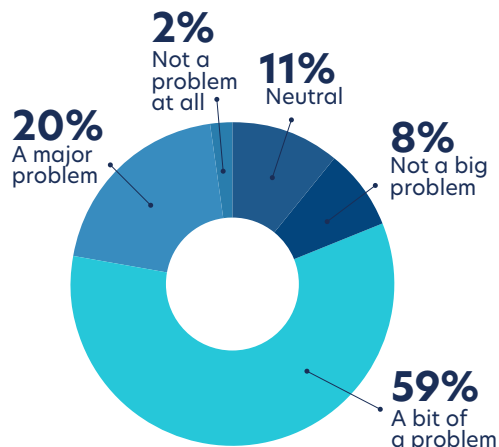
Soho is a unique neighbourhood with many distinctive characteristics, making it a popular location for businesses as well as an attractive destination for visitors. The dense urban landscape and high concentration of businesses (particularly from the hospitality sector) create challenges, however, and the problem of street waste is significant.

Is waste a problem?

The key question in all of our engagements has been

“Do you think that waste is a problem in Soho?”

The overwhelming answer, from **nearly 80% of respondents** to our business survey and the vast majority of participants in our focus group discussions and in-depth-interviews, including two former WCC waste and planning officers with expert knowledge of the subject, was a resounding **“YES”**.



Who is responsible for creating the waste?

Of the 124 businesses surveyed, over 55%, including the vast majority of hospitality businesses in the area, said that they thought **the hospitality sector was primarily responsible**, followed by visitors (25%), residents (10%), 'other' businesses, such as offices (6%) and retail (3%).



**All times of the day there's rubbish piling up...
and people are obviously going to throw more on to that corner**

Recording studio manager

“

It's constantly a problem

Clothing store manager

**Rubbish on every corner...
at all times of the day**

Resident

**We get broken glass... We sweep up
every morning in front of the shop**

Salon owner

**Our problem is that it's bang on the corner,
so we get everybody dumping their rubbish...
piles and piles of rubbish... It's like Crystal
Maze to get into the shop sometimes**

Clothing store manager

**(Waste) gets tripped over, it spills
out, or dogs wee on it... Rats eat it**

Resident

Spotlight: How waste accumulates over the course of a day

During our street survey, we observed several key locations around our focus area to see how waste accumulates over the course of a single day.

As illustrated by the photos below, each taken several hours apart, all sorts of refuse accumulates once someone has placed garbage in a particular location:

Bateman St:



Dean St:



We mapped responses to the question “**Who is responsible for creating the waste?**” (see map right) onto our target area in order to consider locations where respondent businesses felt that waste was caused by hospitality (green), residents (cyan), retail businesses (magenta), visitors (dark blue) and “other businesses” (yellow):

As expected, the high incidence of respondents reporting that they believe **hospitality businesses cause the most issues with waste** is borne out across the target area. Many respondents on Old Compton St, however, indicated that visitors were most responsible for the problem, which is perhaps unsurprising given the high visitor footfall in the area and the nature of the



We further mapped the locations of the 20 respondent businesses that reported generating the most waste overall (see map right). These 20 businesses were all hospitality operations, and collectively **they were responsible for over 55% of the total bags left for collection on a weekly basis despite accounting for only 16% of our sample:**

If we segment responses to the question of which group is most responsible for waste according to the type of business being surveyed, this opinion trend still holds true. There are some noteworthy variations, however, as **hospitality businesses were more likely than others to identify Soho visitors as a significant source of waste, as were residents** who participated in focus



“

Businesses are the biggest generators of rubbish

Resident

It's all down to the way people behave and the way bars behave

Hotel operator

Restaurants put their rubbish out when they feel like it

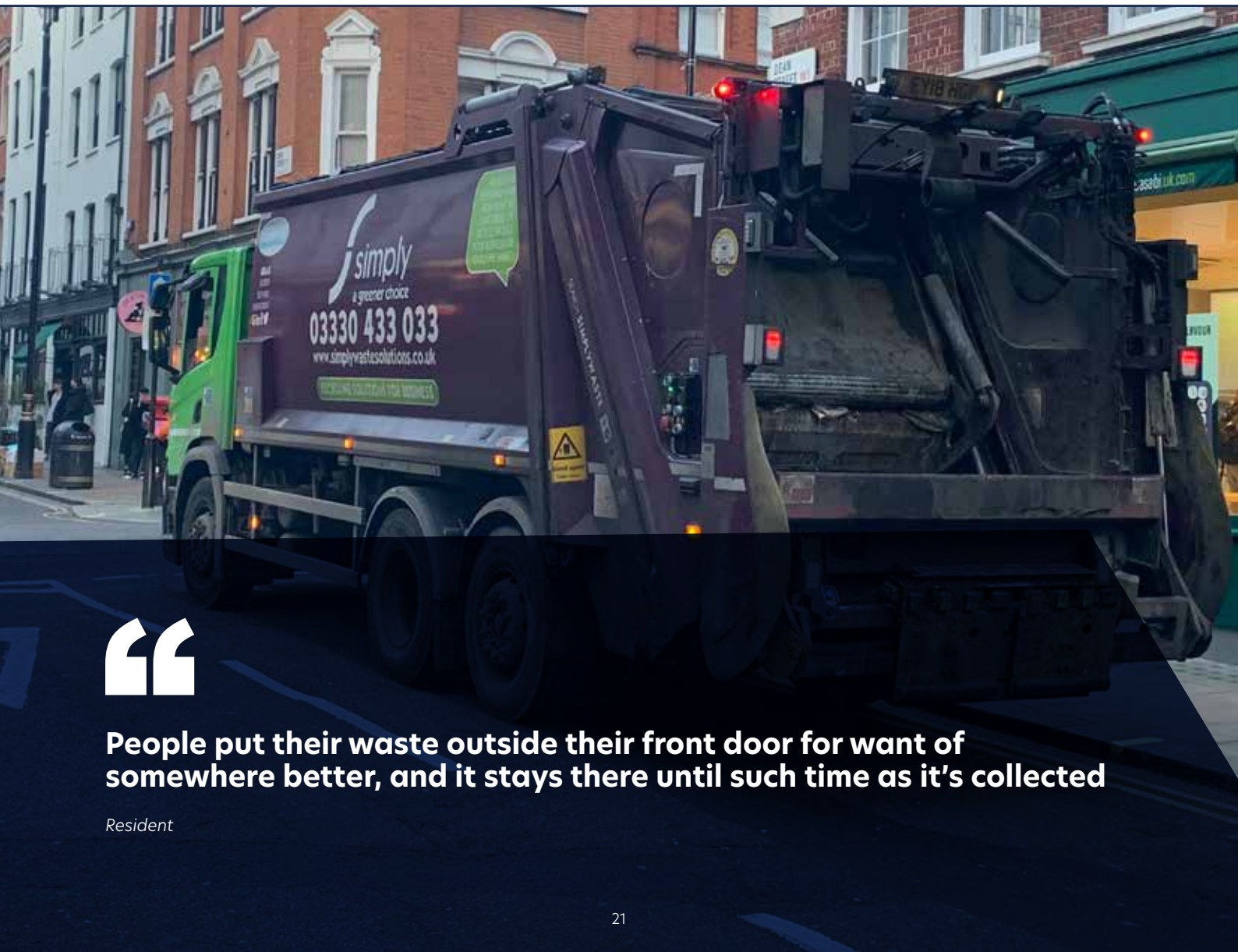
Resident

Most of the notices go to restaurants, bars and clubs

WCC enforcement officer

We asked respondents to our business survey about the quantities of waste types they generate each week, as indicated by the number of bags they place out for collection. This metric of waste generation supports the hypothesis that hospitality businesses are the biggest producers of waste:

- Approximately **65% of bagged waste reported was generated by restaurants**, despite restaurants constituting less than 43% of our sample. This includes all types of recycling, food waste, and general waste.
- **Pubs and bars also generated significant quantities of bagged waste**, accounting for approximately 17.5% of bags reported despite representing just under 13% of the sample
- The figures do not include bars inside theatres and hotels, which also reported that they generated relatively large quantities of bagged waste.



“

People put their waste outside their front door for want of somewhere better, and it stays there until such time as it's collected

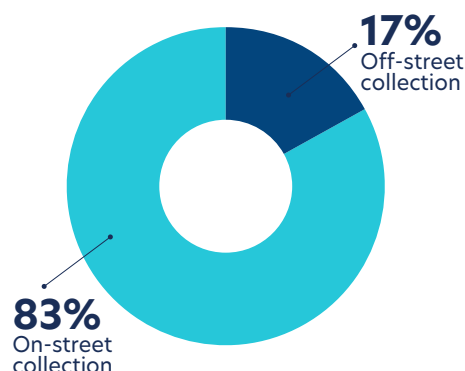
Resident

Why is waste a problem?

A lack of space for storing rubbish is a significant problem, with **only 17% of businesses which responded to our survey indicating that they had access to off-street waste collection services.**

Many participants in focus groups mentioned problems with fly-tipping, but the issue of fly-tipping in Soho is complicated. During our observation exercise we noted clear and obvious instances of fly-tipping, yet it also appeared as though **the greatest volume of bags was left out at the designated times in the designated streets**, and was cleared up fairly rapidly by waste management teams. Items that were not collected within the established timeframes were often fly-tipped items and unmarked bin bags, but also included bags clearly marked as being supplied by local contractors such as Biffa and First Mile.

Many respondents also noted the high incidence of a phenomenon whereby waste (whether litter or bagged waste) would be deposited on top of other waste that was awaiting collection, and we observed this happening on a large number of occasions during our street observation exercise.



Spotlight: Fly-tipping

Over the course of the financial year 2020/21, local authorities in England dealt with 1.13 million fly-tipping incidents, an increase of 16% on the 980,000 reported in 2019/20. As in the previous year, just under two thirds (65%) of fly-tips involved household waste. Total incidents involving household waste were 737,000 in 2020/21, an increase of 16% from 635,000 incidents in 2019/20.

This increase is also reflected in London, with 43 fly-tipping incidents per 1,000 people in 2020/21 versus 40 per 1,000 the year before. In total, there were almost 385,000 fly-tipping incidents across London, with just under 11,500 incidents in Westminster, the 13th highest of any borough in London.

Total associated actions across London were just under 143,000 – but with only 797 actions across Westminster, placing it 25th amongst the boroughs. Of these actions, 326 were Fixed Penalty Notices, 274 Warning Letter Actions, and 197 Investigation Actions.

Spotlight: How much waste is there in Soho?

Over 200 million tonnes of waste is produced in the UK each year but there is currently no single or comprehensive way of tracking it, with legislation relating to the transport, management and description of waste being introduced separately over the last 30 or so years.

Across the UK, large amounts of data are either not collected or not collated centrally. Multiple IT systems collect certain elements of waste tracking data. Some are paper-based, others digital, some are run by private contractors, others by the government, and where use of existing central digital systems is non-mandatory, take-up is very low. As a result, it is very difficult to determine what happens to our waste and to have a comprehensive understanding of whether it has been recycled, recovered, or disposed of.

At time of writing there is a DEFRA consultation in train for the implementation of a mandatory digital waste tracking service across the UK. The consultation runs from January to mid-April 2022. This proposes joining up these fragmented systems and replacing paper-based record-keeping, and will make it much easier and less time consuming for legitimate waste companies to comply with reporting requirements, whilst making it much harder for rogue operators to compete in the industry and commit waste crime, including: fly-tipping, deliberate misclassification of waste, illegal waste exports and the operation of illegal waste sites.

Westminster City Council does not hold data on privately collected or managed waste as the regulatory body for commercial waste management is the Environment Agency. The official data that does exist is often limited and sometimes only available at the Westminster borough level. The waste carriers collect data, but this is commercially sensitive. Therefore, any Soho-related data reflected in this report has been mainly collected through surveys and focus groups carried out over the course of the project.

In one of our interviews, a senior representative of Veolia told us that the company removes "100 tonnes of waste a day" from Soho, from which one could extrapolate that other waste companies active in the area might contribute a further 30 tonnes or so to the total.

Several focus group and in-depth interview participants indicated that they believed local businesses' waste was taken for on-street pickup by staff (such as temporary or contract workers) who were unaware of the rules about where waste is meant to be left, but this was not borne out by the responses we collected from businesses.

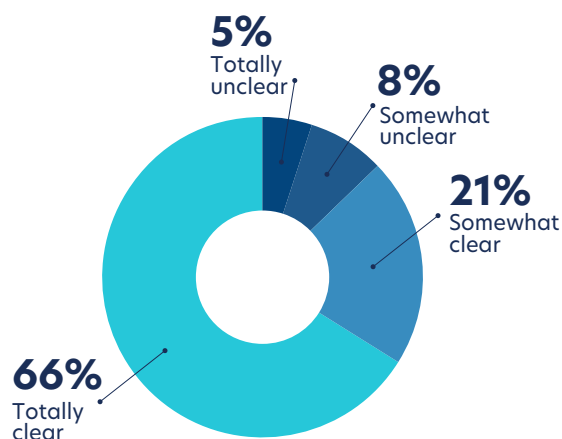
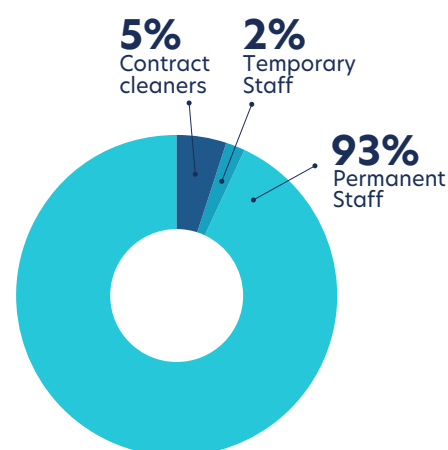
Some **93% of businesses surveyed reported that permanent staff were responsible for dealing with waste**. We would expect that the incidence of contract cleaners being used for waste removal would be higher among offices and other establishments above ground level, but we did not survey these as most were closed due to coronavirus restrictions.

So, although this hypothesis about temporary staff lacking knowledge about proper waste disposal practices proved unsubstantiated by our survey data, **there were an unexpectedly high number of business respondents who indicated that they were at least partially unclear about where and when they were supposed to leave their waste for collection.**

As evidenced by the chart on the right, approximately a third of businesses were less than totally clear on where and when to leave their waste for collection.

We also asked businesses that responded to our quantitative survey whether they had been the subject of enforcement action by Westminster Council in the last 3 years, and there was a strong correlation between the level of clarity businesses had about collections and whether they had been fined:

- Approximately **75%** of businesses who said they were totally or somewhat unclear had been fined
- Only **30%** of businesses who said they were totally clear had been fined





The map on the left illustrates the locations of businesses that took part in our survey and reported that they had been the subject of enforcement action from WCC.

There is **a particular concentration in the lower portion of our target area, particularly along the western end of Old Compton St**, though there are businesses throughout the target area who had been fined.

What issues are caused by the waste problem?

The issue of street waste that remains on roadsides for extended period generates has clear impacts on residents, businesses and visitors. We heard about problems including:

- School children being confronted by waste, including sexually inappropriate product packaging, left outside Soho Parish Primary School
- Residents describing the difficulties they encounter when trying to walk their pets. One resident, for example, told us that she had to carry her dog out of the neighbourhood because there was too much hazardous waste on the pavement
- Businesses having to clear up waste left outside their premises in order to avoid putting off potential customers
- Parents describing how they were so concerned about broken glass on streets that they didn't take their children to local green spaces such as Soho Square Gardens

While conducting our street surveying observation, we noted that even though the sample area area is well-lit relative to some other parts of Soho, we saw people stumble on black bin liners, particularly later in the evening. This is a potentially dangerous issue, and several focus group participants noted that waste left on streets creates hazards for people with mobility challenges.

Spotlight: The cost of waste to businesses

During the course of the project we were asked to provide an estimate on how much an average business spends on processing its waste. Veolia [calculates](#) that small businesses generally spend around £384 a year each on waste disposal, though once wasted energy and wasted labour are also included, this figure will be far higher. Across the 424 businesses in Soho, this alone would equate to at least £162,816 per annum.

According to other [industry estimates](#) released by Kenburn Waste Management, an average business spends between 4% and 10% of its annual turnover on waste management (storing, disposing and paying for the rubbish it produces). We do not have information on the average turnover of businesses in Soho but this would be in the millions of pounds, if reflective.

To look at this in another way, if all of the estimated 130 tonnes of rubbish collected daily from the streets of Soho was sent to landfill, this alone would cost £12,571 per day or almost £4.6m per year (based on the current landfill tax rate of £96.70 per tonne).

Waste management costs are projected to rise by at least 3-4% every year for the foreseeable future. The waste hierarchy is therefore key to follow – prevent, reduce, reuse, recycle, dispose. Decreasing the amount of rubbish that ends up towards the bottom of the hierarchy cuts the cost of waste management substantially.



Lack of coordination: BIDs and pieces

A common issue raised during the course of the project was a **lack of overall coordination** to support the implementation and ongoing success of initiatives to improve the problem of waste in Soho.

One notable example was an initiative by one restaurateur to encourage around thirty fellow bars and restaurants to change to a single waste carrier in order to cut costs and reduce vehicle movements, as well as promoting more sustainable business practices. Unfortunately, due to a lack of dedicated coordination, over time members of the informal scheme were enticed away by other carriers.

Interviewees have pointed to the examples of Business Improvement Districts (BIDs), including those in the local vicinity such as the New West End Company (NWECC), which tend to have a dedicated resource to support the efficient coordination of waste management and ongoing success of such schemes. By introducing financial incentives to reduce the numbers of waste collection companies operating in the area, coupled with the establishment of waste consolidation facilities and ongoing engagement, success has been evident.

"BIDs are wealthy, they collect huge amounts of money off their members and they spend it entirely on commercial waste, street cleaning and safety. They spend hundreds of thousands of pounds on it every year, and Soho misses out on that completely," according to one former WCC executive director we spoke to. **"Westminster is very good at dealing with BIDs,"** they added, **"but Soho doesn't speak with a single voice."**

Not all areas can, or want, to set up BIDs, however. Soho differs from neighbouring areas due to the relative fragmentation of its property ownership, making it harder to generate the critical mass needed to effect widespread or fundamental changes in business behaviour. Several of our expert interviewees put the property ownership structure of Soho at around 20% Shaftesbury, 20% Soho Estates and the rest, circa 60%, divided between a large number of individual and private property owners.

Given that Soho Estates, in particular, was regularly cited by focus group participants and others we spoke to as a 'cash cow' to be milked for potential solutions to the waste problem, this difference between perception and reality is significant.

Spotlight: Business Improvement Districts (BIDs)

Business Improvement Districts (BIDs) are business-led organisations funded by a mandatory levy on all eligible businesses after a successful ballot. BID levy money is ring-fenced for use only in the BID area and businesses decide and direct what they want for the area and can potentially benefit from dedicated resource and joint procurement, including around waste.



BIDs around Soho

There are currently 66 BIDs across London. As the map on the left highlights, there are a number of BIDs **around** Soho but not one **for** Soho.

(Map source: Greater London Authority)

BEE Midtown represents 400 businesses in Holborn, Bloomsbury, St Giles, Farringdon and Clerkenwell.

The Fitzrovia Partnership has more than 250 voting members and approximately 50 voluntary members across Fitzrovia. Members with a rateable value of £160,000 or more in Fitzrovia are automatic voting members, and business priorities include programmes to improve street cleanliness.

New West End Company (NWE) is anchored by Bond St, Oxford St and Regent St, and works across 80 streets, representing 150,000 employees. Partners include Shaftesbury Plc, key stakeholders within Soho. The Chief Executive, Jace Tyrell, is currently Vice-Chair of the Soho Neighbourhood Forum. We have been informed that NWE spends approximately £1.4M on waste collection above and beyond what the Council invests.

Heart of London Business Alliance (HOLBA) serves as a voice for 500 businesses and 100 property owners in the Piccadilly & St James's and Leicester Square & Piccadilly Circus districts - an area with more than 200 million visitors every year. Board Members include Soho Estates.

The **Northbank BID** area is rich in history, architecture, culture and famous landmarks, including Trafalgar Square and Somerset House. The BID works across four strategic themes including "Public Realm & Environment."

GREENING SOHO'S WASTE

Towards a circular economy

The Circular Economy is defined in London Plan Policy SI7 'Reducing waste and supporting the Circular Economy' as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The end goal is to retain the value of materials and resources indefinitely, with no residual waste at all.

A circular economy stands in contrast to our current linear system, where materials are mined, manufactured, used and thrown away. The 'Take, Make, Dispose' model, or 'linear' economy, has fuelled rapid growth but is inherently unsustainable in the long term where resources are finite.

Widespread adoption of circular economy principles would dramatically reduce the quantity of new material imported into Soho and the amount of waste needing to be managed. Since environmental concerns are inherently part of the brief for this project, we consider these "green" issues here in the context of the circular economy principles of recycling, reuse and repair, as well as touching on other environmental issues where appropriate.

Recycling

WCC's municipal waste management plan and the City For All plan outline how the Council plans to increase its recycling rates. The main goals of WCC's waste and recycling services is to provide effective and efficient management of municipal waste, increasing the recycling rate and limiting the impact on climate change and the environment. Aims include:

- To maximise the management of waste in the top 3 sections of the waste hierarchy - reduction, reuse and recycling
- To achieve conformity with the national and London-based strategies where practicable and cost effective to do so



I'm looking for some progressive action because I want to be able to recycle some plastic that we've got... I'm (also) in conversations with producers to tell them to get rid of packaging

Clothing store manager

With a recycling rate of only 20.4%, **Westminster had the second worst recycling rate in London** and ranked 339th in the country in 2019-20. As a borough, Westminster recycled 18,104 tonnes out of a total of 88,619 tonnes of household waste. According to Westminster Council's January 2022 RRP report, a household collection scheme for food waste is being rolled out across the borough in 2022. However, waste segregation schemes for commercial properties and a coffee cup recycling scheme have been put on hold at the time of writing due to the impact of the pandemic.

Nevertheless, **just over 44% of bags reported in our business survey were recycling bags**, including food waste and all types of mixed and disaggregated recycling. This is higher than expected based on comparable benchmarks, and there was diversity of opinion regarding the merits of recycling amongst focus group participants.

"The price of a WCC mixed recycling bag has barely changed in the last eight or nine years, whilst the cost of recycling has increased enormously. How is it that Westminster sells so many cheap recycling bags, yet has one of the lowest recycling rates in the country? What's happening to them?" wondered one expert interviewee we spoke to. "We know that they have a very cheap deal on waste incineration [Energy from Waste, with SELCHP – see Spotlight, page 43], and that waste incinerators are short of material at the moment, due to Covid. At the same time, the cost of recycling has gone up, as commodity prices have gone down, so it's cheaper to divert recycling to the incinerator." This was a suspicion shared by a number of our focus group participants, at least one of whom pointed out that any recycling bags contaminated with food waste, for example, are routinely diverted to incineration.

Westminster City Council strongly refutes this allegation, however, saying: "It is factually incorrect that we incinerate our recycling and would be illegal under the Waste Framework Directive; recycled waste is sent to appropriately licensed treatment facilities, in accordance with waste management legislation. The council strongly refutes this claim and does not want people to be put off recycling schemes within Westminster as a consequence of this claim."

Most residents were highly supportive of recycling efforts, as were some business operators, though other business operators noted that practical considerations (staff time, financial costs, etc) sometimes overrode environmental considerations. Indeed, among businesses surveyed by our study, less than 11% indicated that "green credentials" were the most important factor when choosing a waste management provider. We also spoke with hospitality businesses about "non-traditional" forms of recycling, including food waste. Only 22.4% of restaurants surveyed indicated that they used dedicated bags for food waste, and **18.5% of all businesses reported that they did not do any recycling at all**.

Visiting The Crown Estate's consolidation centres at Air St, Swallow St and St James's Market we were struck by the high level of recycling. Through a dedicated focus, recycling rates have already increased from around 40% to around 60%, and the target is now around 75%. This is across all waste types including cardboard, glass and food.

“

Is there a place in Soho where you can put batteries? I don't know

Clothing store manager

Westminster doesn't recycle... It's a myth... I asked one of the bin men, (and he said) "We just put it all in the same bag"

Salon owner

I'm up for different kinds of refuse schemes, if they make sense

Clothing store operator

It's got to be led by the council, and supported by businesses... Make it easier for businesses, like (creating) three central points in Soho for putting glass

Resident

Reuse, repair

We saw little evidence of reuse and repair during the course of the project, with one notable exception being Nudie Jeans' Repair Shop in the company's outlet on D'Arblay St, the manager of which participated in one of our Retail sector focus groups. Opened in the summer of 2013, the company's Soho store was the first to include the 'repair shop' concept (where customers can have their old jeans repaired for free), which has since been rolled out to all the company's stores globally.

Plastic pollution

Plastic is everywhere – it's in the air we breathe, the water we drink, the food we eat and the clothes we wear. It's also a massive pollution problem. To stop this, we must use and thus produce less plastic in the first place.

There are a number of initiatives already in Soho:

- 10 years ago several leading bars, restaurants and hotels in Soho launched the 'Straw Wars' campaign to stop automatically giving plastic straws to customers, instead only handing them out when requested. Engagement with the scheme was good, and this foreshadowed wider national efforts.
- Luxury members' club Soho House announced in May 2019 that it would dramatically reduce its plastic use at locations including Mayfair and Soho. The company is one of the world's first adopters of A Plastic Planet's commitment mark 'Working Towards Plastic Free'. This commitment includes undertaking a plastic audit across each of the company's 23 Houses around the world and introducing a board-level Plastic Free Ambassador who will update staff and members on progress.

The proposed national Deposit Return Scheme, outlined later in this report, should further help to reduce the use of plastic in Soho.

Air Quality

An analysis of lifestyle and environmental measures published by the University of Liverpool in July 2019 (see [here](#)) revealed that **Soho is the unhealthiest neighbourhood to live in the country**. The study found that Soho had the greatest access to unhealthy opportunities such as takeaways, pubs and off licences, combined with high levels of air pollution and low levels of parks and green spaces.

Soho was not the only area in London which has reported illegal levels of air pollution since 2010, and this contributed to around 6,000 excess deaths in the capital in 2019.

A key part of Transport for London's 'Healthy Street' approach to improve air quality focuses on encouraging walking and cycling, more greening of areas and the electrification of transport, some aspects of which are becoming more visible in Soho.

According to WCC, it is a key priority for the Council to decarbonise its waste collection and street cleansing operations, including the full electrification of its collection and street cleansing fleet by 2024.

At the beginning of October, Veolia/WCC announced the introduction of a 60-strong fleet of new and upcycled electric vehicles for waste collection across the borough, including smaller trucks and tricycles, better suited to the narrow streets of Soho.

Other waste carriers have also introduced their own electric vehicles, including Biffa and Paper Round. Biffa's electric vans are already active on the streets of Soho as part of the company's co-marketing initiative with SBA. The company told us it is also looking to introduce a fully electric HGV with a capacity of 18 tonnes of waste, which it has already rolled out in Manchester.

When we spoke to First Mile, however, they were sceptical about the introduction of large electric vehicles. Not only are they "three times the price" of an equivalent Euro 6 clean diesel vehicle, "which has less embedded carbon in it than a battery-powered vehicle anyway," but **"the current charging infrastructure is not fit for purpose**, meaning they can only work a single shift, so you need two of them to do the work of a single diesel truck."

During the course of the project, our team also observed Veolia operatives wheeling handcarts of commercial waste from Oxford St to an unspecified "depot" somewhere in the area – a non-disruptive, environmentally friendly means of collection which could, if rolled out more widely, play an important part in reducing vehicle movements and the time that waste spends on the streets in Soho. We have been informed that this waste may be taken to a street cleansing depot on Dufour's Place.



Upcoming reforms and solutions

Across the UK, consumers go through an estimated 14 billion plastic drink bottles, 9 billion drink cans and 5 billion glass bottles a year. The UK Government for England, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs (DEFRA) in Northern Ireland have all made commitments to develop policies which work towards ensuring resources are kept in use for as long as possible and waste is minimised.

Upcoming reforms including the DRS (Deposit Return Scheme), Extended Producer Responsibility (EPR) and Consistency in Household and Business Recycling in England are likely to have implications for the issue of waste in Soho. Below is a brief summary of several potentially significant upcoming reforms:

Deposit Return Scheme (DRS)

By creating a deposit return scheme, the UK and Scottish Governments want to increase the recycling rate of drinks containers and reduce littering. Introducing such a scheme should help to change consumer behaviour and encourage higher levels of drinks container recycling.

Scotland will be the first to go live with a Deposit Return Scheme, which is due to be implemented on 16th August 2023. England, Northern Ireland and Wales are expected to go live in 2024, subject to feedback received during recent consultations.

The Scottish Government has confirmed that PET bottles, steel and aluminium cans and glass drinks bottles will be included, and deposits will apply for drinks containers from 50ml to 3 litres. They have also opted for a flat 20p deposit for each container. Businesses selling in-scope materials will need to act as a return point, either via a manual return or, unless exempted, use of a Reverse Vending Machine (RVM).

For the rest of the UK, DEFRA is considering whether kerbside collection systems can facilitate digital DRS. Use of Reverse Vending Machines will be subject to Permitted Development Rights and local authorities, through the role of Trading Standards, can enforce retailer obligations. A new body called the Deposit Management Organisation is expected to be established to oversee the scheme.



Extended Producer Responsibility

Extended Producer Responsibility (EPR) is an established policy approach adopted by many countries around the world, across a broad range of products and materials. It gives producers an incentive to make better, more sustainable decisions at the product design stage, including decisions that make it easier for products to be reused or recycled at their end of life. It also places the financial cost of managing products once they reach end of life on producers.

The UK Government proposes introducing obligations, possibly in the form of packaging reuse targets for 2025, to provide an additional incentive to reduce packaging use and encourage take-up of reuse or refill models.

To support consumers in homes and businesses across the country to make the right recycling decisions, all packaging will be clearly and consistently labelled to inform consumers whether it can or cannot be recycled. This will reduce confusion and make it easier for us all to do the right thing.

To inform the fees packaging producers pay, and how they label their packaging, producers will need to self-assess their packaging to determine its recyclability. This will not just be based on whether it is technically recyclable, but also whether the infrastructure is in place.

As part of full net cost payments, producers of commonly littered packaging such as fast-food packaging and single use cups will be made responsible for the cost of its management.

DEFRA estimates that the cost to producers in the first full year of operation in 2024 will be:

- £1bn for packaging collected from UK households
- £200m for bin and ground packaging litter
- £1.5bn for packaging waste collected from UK businesses

Payments will be collected and allocated by a new scheme administrator. DEFRA's preference is to make payments to councils based on modelled data rather than actual costs. Three options are set out for business waste payments and the current lack of data is acknowledged as a challenge.

For non-domestic packaging waste (that is similar to household), the packaging producers including brand owners are preparing an alternative option for delivery that they plan to present to the government. If successful, this would reduce the costs they will be responsible for.

Consistency in Household and Business Recycling in England

Increasing consistency in recycling will reduce confusion in the materials that can be collected for recycling at the kerbside.

Proposals include:

- Dry recyclable materials – metal packaging, glass, paper and card and most plastic packaging aside from plastic films from October 2023
- Plastic films to be phased in by financial year 2026/2027
- Separate weekly food waste collections from all properties (preferably sent to anaerobic digestion) introduced in financial year 2023/24 (later for those with complex residual waste contract arrangements)
- Free fortnightly minimum service for garden waste (households only)

Persistent Organic Pollutants (POPs)

An emerging new challenge in the waste sector is regulatory awareness and concern over Persistent Organic Pollutants (POPs) in domestic soft furnishings. These materials are used in almost all furniture produced in the last half century that is more than 5-10 years old, and while some items can be repaired and reused, many will need to be destroyed by incineration.

This is a requirement of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, meaning that it will definitely have to be considered in the coming years.



WASTE SERVICE PROVIDERS

All waste collectors, great and small

We heard the claim there are up to 80 waste collection companies licensed to operate in the City of Westminster. This may be accurate, but **our research identified only 17 companies** serving businesses within our project focus area.

WCC's Waste & Recycling Collection, Street Cleansing and Ancillary Services Contract was initially awarded to Veolia in 2009. The Council's current 'waste and cleansing' contract is scheduled to end in September 2024. Preparation of a procurement plan for the next contract will commence during 2022.

The contract award and bid assessment criteria are published as part of the publication of the tender documentation which is accommodated via capitalEsourcing. WCC's applicable elected Cabinet Members ultimately authorise any relevant contract award.

All local authority municipal waste data, including WCC's, is reported quarterly via DEFRA's Waste Data Flow (WDF) portal, which is publicly accessible. WDF lists all the various destinations where a local authority's waste is treated or processed, including the final destinations where various materials and waste streams coming out of these treatment processes are taken.

So who collects Soho's waste?

According to our quant survey respondents, **Veolia/WCC is the leading waste service provider with over 65% of the local market**. First Mile is a distant second at 17% and Biffa third at 2%. During the course of our work, we interviewed representatives of all three companies, plus Paper Round, which focuses mainly on in-office collection, rather than bags on streets, as well as being the sole provider of waste collection services for The Crown Estate.



Waste collection in Soho is a free-for-all, with dozens of companies criss-crossing the area in large, noisy, polluting lorries at all hours of the day and night

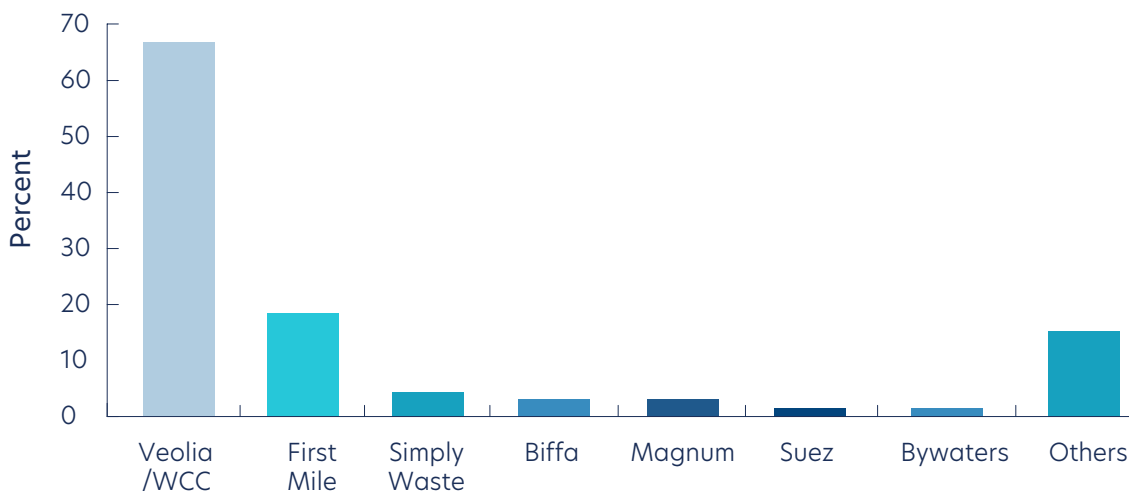
Resident

As the incumbent WCC waste service provider, Veolia were, understandably, more circumspect in their responses than their competitors, citing client confidentiality as well as commercial sensitivity. They did assure us, however, that a great deal of activity is going on behind the scenes to improve waste management in Soho and that a number of important announcements can be expected from WCC over the coming months.

“Every council in the land wins and loses votes on clean streets,” a former WCC executive director told us, “so, politically, there is leverage.”

Among the other companies cited by survey respondents or observed working in Soho by the project team were: Abba, Magnum Environmental, Spectrum (incineration only), JRC, MPF, SRCL (medical waste specialists), PCS, RSL, Pale Dot (circular economy specialists/providers of ingredients and recycling services to F&B businesses), Simply Waste Solutions, Korona Waste, Bywaters, Grundon, First Waste, B&M, and Dirty Harry’s Waste Management (acquired by Simply Waste in 2018).

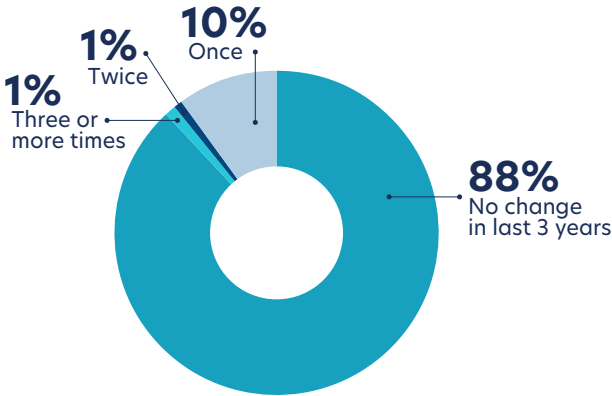
A number of the other service providers are specialist companies collecting the likes of used cooking oil and medical waste from a relatively small number of customers – usually from off-street locations and (mostly) using smaller vehicles, for economic reasons if nothing else.



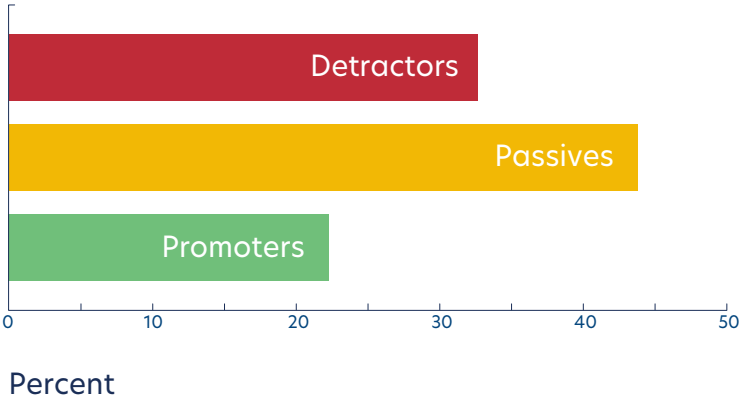
How do businesses choose their provider?

Soho residents receive services from WCC/Veolia, but businesses have a choice of providers. During our quantitative survey of businesses we asked a number of questions regarding the factors that influenced their decisions to contract with their chosen providers, and we also discussed provider choices during the focus groups and depth interviews.

When we asked how often businesses had changed provider in the last three years, which is a proxy for the level of engagement demonstrated by purchasers, we found that **the level of interest in exploring options was relatively limited.**







Only around 12% of businesses surveyed have changed at all during that period, despite very **few businesses expressing satisfaction with the services they receive from their current provider.** This is illustrated by the chart below, which shows the responses we received to the question “How likely are you to recommend your current waste service provider to a friend or colleague?”



Spotlight: Net promoter score and customer satisfaction

Net promoter score (NPS) is a widely used market research metric that typically takes the form of a single survey question asking respondents to rate the likelihood that they would recommend a company, product, or a service to a friend or colleague out of 10. The NPS assumes a subdivision of respondents into “promoters” who provide ratings of 9 or 10, “passives” who provide ratings of 7 or 8, and “detractors” who provide ratings of 6 or lower. In our survey only 22.6% of respondent businesses were highly likely to recommend their waste service provider, and over 33% indicated that they were largely or highly unsatisfied.

When asked to rank several factors in terms of how significant they would be when choosing a waste management provider, the majority of businesses told us that the most important factor would be the specifics of the service they received. This fits with an overall hypothesis that **the scheduling of pickups and locations for depositing street waste is a significant cause of concern for business operators**. This outweighed even financial cost as a factor and was cited by significantly more respondents than environmental concerns or customer service/engagement:

Item	Overall Rank	Rank Distribution
Service quality (incl. number of pickups, scheduling, etc)	1	
Price/Cost	2	
Green credentials of provider	3	
Customer service (responsiveness, availability of online/app booking, etc)	4	



Garbage trucks coming around at different times, and there's a lot of them... There are piles of rubbish here and there that often don't get collected when the trucks come

Resident

Quite often, (waste collection companies) aren't very reliable

Resident

We need to know what we're doing... We've gone from being able to put it outside, to 'no, it's not being picked up there'... Different companies prescribe different methods of collecting

Clothing store manager

Collection times

According to several of our expert interviewees, **the current routes and collection times were originally established in 2004** in consultation with Veolia. Local businesses or residents were not consulted, however, according to one person we spoke to who was closely involved in the process. Since then, the nature of waste collection, as well as hospitality business licensing/ hours, working practices and traffic flows, has changed significantly.

The table below illustrates the collection times of streets in our target area:

Street	Time 1	Time 2	Time 3
Bateman	03.00-05.00	18.00-20.00	n/a
Carlisle	18.00-20.00	23.00-01.00	n/a
Dean	03.00-05.00	17.00-19.00	n/a
Frith	03.00-05.00	18.00-20.00	n/a
Meard	02.00-04.00	10.00-12.00	17.00-19.00
Old Compton	03.00-05.00	17.00-19.00	n/a
Richmond Buildings	03.00-05.00	17.00-19.00	n/a
Romilly	03.00-05.00	16.00-18.00	n/a
Soho Square	18.00-20.00	23.00-01.00	n/a
Soho St	18.00-20.00	23.00-01.00	n/a
St Anne's Court	02.00-04.00	19.00-21.00	n/a
Wardour	02.00-04.00	10.00-12.00	19.00-21.00

As part of our business survey, we collected data on businesses' opening and closing times so that we could compare this to the collection times above. The results of this comparison illustrated that **there is a significant disconnection between the times that businesses close and when their refuse is collected**. For example:

- On Wardour St, the mode average gap between closing and collection is **3 hours**
- On Old Compton St, the mode average gap between closing and collection is **4 hours**
- On Dean St, the mode average gap is also **4 hours**
- On Romilly St (which admittedly has fewer businesses than most others) the mode average gap is **5 hours**

We asked some of our depth interviewees how long it would take for their businesses to consolidate and bag their waste after closing, and most said that it took approximately 60-90 minutes in most cases. This means that **a significant number of businesses are having to wait several hours to put their waste out for collection**, or risk being fined.



I have to employ people to come in at six in the morning and put rubbish out

Hotel operator

(There is) not enough signage telling people when they need to put it down, where they need to put it

Resident

I don't want to wait until 6:30 to put my rubbish out... we consume a lot... What's so special about 6:30? I don't understand it

Salon owner

Where does the waste go?

All local authority municipal waste data, including WCC's, is reported quarterly via DEFRA's Waste Data Flow (WDF) portal, which is publicly accessible. WDF lists all the various destinations where a local authority's waste is treated or processed, including the final destinations where various material and waste streams coming out of these treatment processes are taken.

In July 2016 Veolia secured three contracts for the sustainable treatment of domestic and business recycling and waste from Westminster City Council, worth a total of £71m:

- Dry, mixed and source segregated recycling (for 3.5 years from September 2016)
- Food waste treatment (for 3.5 years from September 2016)
- The treatment of residual, bulky waste and street sweepings (for 6.5 years from September 2017)

The contracts set out for mixed recyclates to be taken to Veolia's Materials Recovery Facility in Southwark, to be sorted and separated for reprocessing. Food waste is treated in partnership with Biogen at its Anaerobic Digestion facility in Baldock, Hertfordshire. The plant maximises the use of this valuable resource by transforming it into a renewable fuel source, as well as producing fertiliser.

Residual waste is recovered into energy at South East London Combined Heat and Power (SELCHP) facility, operated by Veolia. The waste is used to create power for the National Grid and heating and hot water for local homes. Street sweepings are recycled via Veolia's specialist facility at Rainham and bulky waste, such as furniture at its Greenwich facility.

First Mile told us that their general waste from Soho is taken to Cory Environmental's facility at Walbrook Wharf in the City, where it is transferred to barges and taken down the river to Tilbury. Whilst some recycling is sent directly to a recycling facility, "we generally prefer to look at it first," so the majority is sent in the first instance to the company's site in Park Royal.

Spotlight: SELCHP

SELCHP (commonly pronounced 'sell-chip') is an advanced Energy Recovery Facility built through a partnership between the public and private sectors. Opened in 1994, SELCHP is regarded as an example of industry best practice, with similar facilities modelled on its design now constructed around the world.

The site is capable of handling 440,000 tonnes of waste per year. Powering 60,600 homes and also providing heat to thousands of local homes every year.

In its over 25 years of operation, SELCHP has produced over 5 million MWh of electricity, equivalent to the power used by over 1.5 million homes in a year, helped to divert over 10 million tonnes of waste from landfill and used for energy recovery and reduced CO2 emissions by 7,700 tonnes per year.

As an estimated 20% of the nation's carbon emissions are generated by domestic heating, due to a low standard of energy efficiency, using this type of non-fossil fuel heating lowers carbon emissions and can help reduce cost, and fuel poverty, in vulnerable groups.

Other regulations and legislation

Waste carriers have to comply with a host of other regulations and requirements, the most relevant of which are referenced below:

Waste Transfer Notes

For each load of non-hazardous waste that businesses move off their premises, a waste transfer note or a document with the same information, such as an invoice, is required. Businesses must include enough information to help the business collecting the waste to handle and dispose of it safely.

Guide to maintaining road-worthiness

Waste collectors operating collection fleets also need to comply with transport-based legislation, such as that set by the Driver & Vehicles Standards Agency.

Health & Safety

Working practises in waste collection are regulated via the Health and Safety Executive.



Nearby examples of good practice

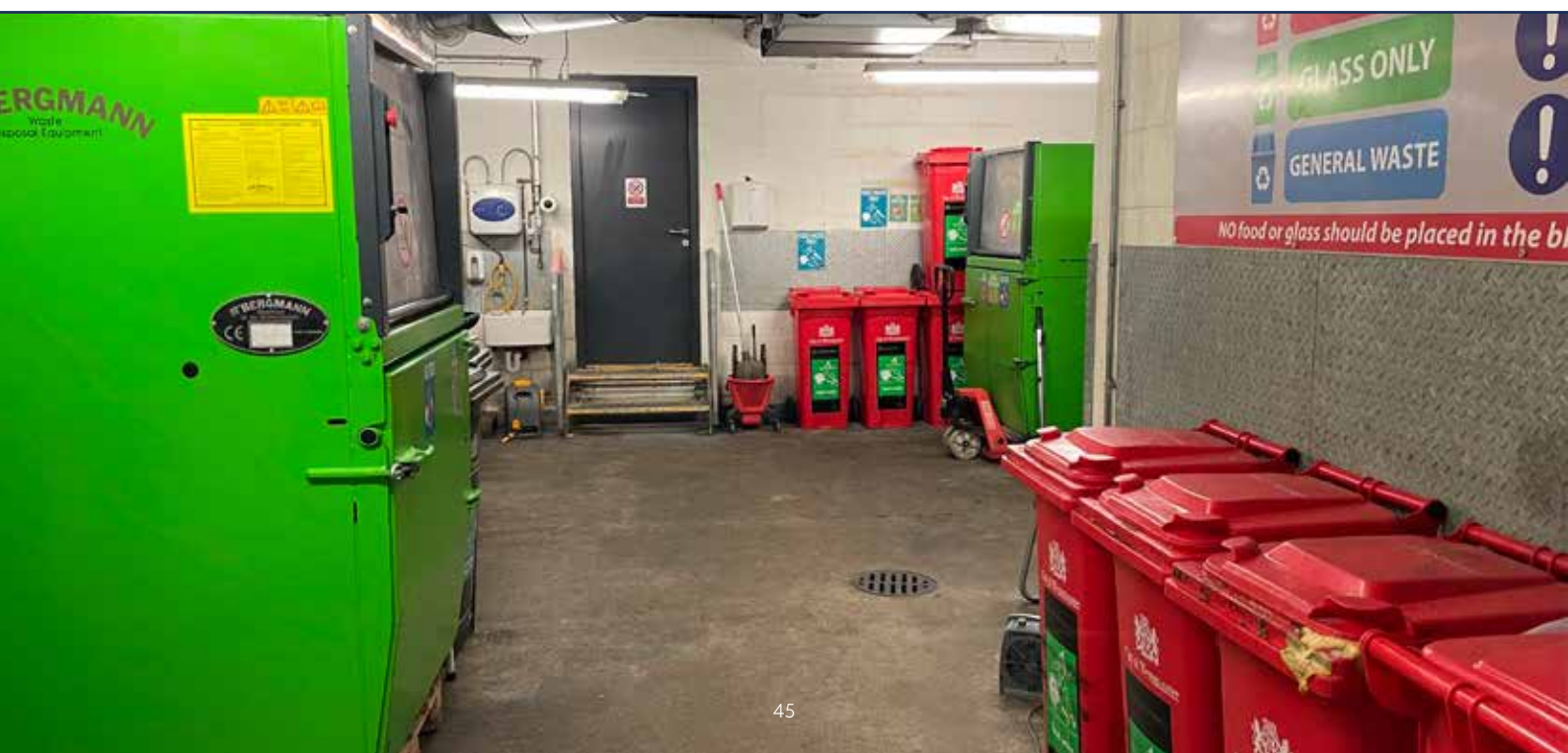
A number of the BIDs and larger property managers in areas that surround Soho have implemented rigorous systems for managing waste, and we visited several of their waste collection centres to observe and report on good practices.

Our team was made aware of at least five consolidation facilities in the vicinity of Soho. Two of these are owned and managed by Shaftesbury Plc, at Kingly Court and Carnaby Court (an internal company term for the adjacent block, on the corner of Kingly St and Ganton St), the other three by The Crown Estate (TCE), at Swallow St, Air St and St James's Market.

Widely acknowledged as a key component of any proposed solution to Soho's waste challenges, establishing waste collection centres could be an important step. One waste collection company representative we spoke to told us that "**consolidation is the dream**", though they acknowledged that it was a difficult dream to achieve.

Shaftesbury

When we visited Shaftesbury's two sites, we were struck by their **modest size and efficiency**. The larger (Carnaby Court) was barely 7 metres by 6, yet could accommodate two general waste compactors, one cardboard compactor, a glass crusher, 6 (240 ltr) wheelie bins and a (1100 ltr) Eurobin with plenty of room to spare. According to the managers we spoke to, Carnaby Court has an average throughput of 500-600kg of general waste, cardboard and glass a day, although the glass crusher had never been used and was due to be moved to an alternative site shortly after our visit. Approximately 40% of the centre's capacity is used by the Indian restaurant Dishoom, with the other half serving 16 other businesses, plus some residential addresses.



The facility at Kingly Court was noticeably narrower, yet still had room for most of the equipment found at Carnaby Court, bar the Eurobin, as well as an additional twelve wheelie bins (for a total of 18).

Surprisingly for its size, Kingly Court handles considerably more waste than its neighbour. The centre deals with around two tonnes of waste per day, with more on Fridays and Saturdays. Used exclusively by Veolia, who collect early in the morning, before the majority of Carnaby's retail and hospitality outlets open, "by 8.30am, food waste is done," according to the site manager.

The centre serves a total of 39 businesses, including all of the restaurants in Kingly Court, plus several further down Kingly St.

From Shaftesbury's point of view, the centres serve to keep waste off the streets as well as providing an added benefit to tenants. **"When visitors feel safe and secure in an area, they spend more time and money there,"** letting agents CBRE told us. When asked how much the scheme cost to run, they told us that "It washes its face. It's not a drain on resources, but it's also not for profit."

Both rooms use Weightrons, which are large, electronic weighing scales that calculate the price per kilo due on different types of waste and add it to the service charge of the business in question. The system is clearly a win-win for both landlord and tenant, relieving businesses of the drudgery of putting bags out every night, and the risk of being fined, whilst improving the public realm and reducing churn of occupants.

Neither facility appeared to require any special infrastructure or architectural features, with bags and bins either carried or wheeled in and out by hand and foot, although the manager did admit that "strong ventilation is essential."

The Crown Estate

The Crown Estate's consolidation facilities are of an altogether different order of magnitude. Opened in 2011, the 20 Air St Recycling Hub (which is primarily located on Sherwood St) caters for some 36 different businesses, including a large hotel, offices, retail, residential and F&B, processing a total volume of 1,201,115kg in 2019, with a recycling rate of 57%. Part of a larger loading bay, the waste management hub is housed in a marked off area of around 20m x 30m.

Waste management is provided by service partner PSS, who collect it from buildings using small electric vehicles and take it to the hub, where it is weighed, stored and collected by TCE's waste management contractor, Paper Round, "twice a week for general waste and three times a week for mixed recycling, with three collections a day for food bins," according to the facility's manager. We noted five (120 ltr) wheelie bins for coffee grounds, twelve (240ltr) for food and two (1100 ltr) Eurobins for glass.

All tenants are given personalised stickers to put on all their bags, with all stickers accounted for. Although all waste is weighed and the figures logged, this information is currently used purely for internal purposes, with tenants being charged a fixed price per bag for different waste types and monthly reports provided to TCE. Any recycling contaminated with food or other material is automatically logged as general waste, which is charged at a higher rate than recycling, thereby encouraging greater quality control by the tenants themselves. All contaminated bags are noted, and repeat offenders are engaged with, to remedy the situation, with companies encouraged to designate a 'waste champion' among their permanent staff to facilitate the process. We were told that one large French restaurant in the area (which at that time used a lot of temp agency workers) received three training sessions last year. TCE does not, however, impose financial penalties for non-compliance.



Waste streams collected include dry mixed recyclables (paper, plastic, cans), cardboard, glass, food and coffee grounds, and general waste. PSS also provides ad hoc collections, such as IT, on demand. Food waste is macerated, held in a tanker for weekly collection, and is 100% recycled by anaerobic digestion, converting it into biogas, which is filtered and fed into the national grid, as well as agricultural fertiliser.

Established in 2008, TCE's Swallow St Recycling Hub (which is located primarily on Vine St) is used mostly by businesses located in Swallow St and Heddon St, including a hotel, offices, retail, residential and F&B, serving 52 customers in total. Larger than Air St, the Recycling Hub is a retro-fit with a dedicated space of around 30m x 40m provided in the loading bay, and a ceiling height of approximately 8m. With one compactor for general waste, another for cardboard, and one Envac food recycling machine, the hub houses six food waste bins, four Eurobins for mixed recycling, and 16 Eurobins for glass. The food recycling process is extremely efficient, with bins emptied into the Envac machine, which macerates the waste, piping it into a tank from where it is collected by tanker trucks every week to 10 days.

Swallow St processes a great deal of glass from nearby hotels and restaurants, which we can confirm is extremely noisy to collect, although this is done only between 9.00am and 10.00am, three times a week, and generally takes no more than 5-15 minutes. The manager we spoke to estimated that **the hub was running at around 50% capacity at the time of our visit** (although this was during Covid restrictions, with lower volumes than in 2018), meaning that it could, in theory, process glass and food waste from nearby West Soho, where at least one hotel owner we spoke to identified the former as a significant challenge for their business.

As at Air St, waste management (including collection of waste from occupiers by electric vehicle) is provided by PSS and collection by Paper Round. Waste streams include general waste, the recycling streams listed above, plus ad-hoc collection of items such as IT. In 2019, Vine St collected 1,651,543 kg of waste, with a recycling rate of 59%.

The most recent addition to TCE's recycling network, St Albans House in St James's Market was established in 2018, although unlike the others the building itself has yet to be redeveloped, and the hub is currently located in a car park in the basement. In contrast to its counterparts to the north, where the use of space is highly optimised, at St Albans the equipment, bins and electric vehicles are spread over a wider area, as with fewer cars using the facility, there is plenty to spare.

Given its original purpose, the ceiling is much lower, and the ventilation less efficient, so the odour of waste is more noticeable, however this may have more to do with the de-watering and heating of food waste on site. Unlike the other two centres, waste management is provided by a different service provider, Principles Cleaning, which handles street, building and office cleaning for the whole of the estate.

The hub also has access to a modern, purpose-built loading bay, with equipment including a cardboard compactor, producing at least one 500kg bale of compacted cardboard a day. With a team of seven people using three electric trucks, covering 27 tenant contracts across 42 buildings, including ten restaurants, St Albans currently services 120 companies.

Business Performance Reporting (BPR) is a core function of the hub, which consolidates data from TCE's other waste management facilities, providing tenants with quarterly reports on their waste management efficiency, and training sessions, where necessary. In 2019, St Albans processed 1,340,449 kg of waste, with a recycling rate of 59%.

From our conversation with a senior representative of The Crown Estate, it was clear that TCE's entire approach to waste management has been driven primarily by dissatisfaction with the status quo, and the **lack of flexibility in collection times in particular**. "The current WCC contract has a lot to answer for. TCE had to step in and do its own thing as a result of that contract, because it wasn't picking up our tenants' waste at the times they wanted to put it out."



Throughout the conversation, our interviewee was keen to emphasise TCE's willingness to **"work collaboratively and positively with Soho"** to address the area's shared waste challenges.

"St James's, in particular, has a lot in common with Soho, with lots of small retail outlets with residential property above, no room for storage, etc. So, we had a situation where bags would be left out for extended periods of time and some of them would split, staining the York stone paving and so on. So, we decided that consolidation was a more effective solution than constantly cleaning streets, and have been advocating and evangelising for it for the past ten years."

Precisely what form said collaboration might take is a matter for further discussion, but potentially, it could include use of spare consolidation capacity ("if it ticks boxes such as reducing congestion and pollution on Regent St and side streets") as well as shared learnings and expertise.

Our interviewee did acknowledge, however, that the fragmented ownership of property in Soho is a complicating factor, adding that: **"The complete waste management solution (in Soho) involves looking at the fully disaggregated datasets of all the different land ownerships and land uses**, by type and area, highlighting the particular challenges in each and making specific recommendations and action points."



Potential locations within Soho

During the course of the project, several potential sites for consolidation were raised. These include:

Soho Square Gardens

We were made aware of the existence of a World War II bomb shelter beneath Soho Square Gardens, which, with certain adaptations, **could potentially serve as a waste consolidation hub for businesses in Soho.**

Although not currently accessible to the public, the 300 sqm brick and concrete space was put on the market in 2015 for £175,000, with WCC offering a long lease on the property. Despite “attracting interest from three restaurant groups, as well as gym and music venue operators”, according to press reports at the time, no buyer was ever found.

As the picture below shows, **the structure is easily big enough to accommodate a consolidation centre** similar to those operated by Shaftesbury at its Carnaby facilities, although it would be necessary to enlarge and adapt the current entrance on the West side of the gardens, not least to allow the installation of compactors and other equipment.

When we put the suggestion to representatives of Veolia in our interview, they told us that the idea was already under consideration, although one Westminster City Councillor we spoke to thought that the lack of vehicular access was “a deal-breaker”. As both of Shaftesbury’s consolidation centres are pedestrian access only, however, we believe there is merit in further evaluation of the site by specialist architects and/or engineers.



Golden Square

We were also given to understand that a similar shelter exists (or existed) beneath the gardens in Golden Square, which, if correct, could provide a western counterpoint to Soho Square in the east. Reliable information on this was hard to come by, however. We spoke to the square's caretaker, who told us that he was regularly asked by visitors about the existence of the bunker, and that to the best of his knowledge it did indeed exist, although he believed that the chamber had long since been sealed off by the Council, and even he did not know where the entrance would have been. A less readily available option, then, but still one that we believe warrants further discussion with WCC.

Brewer St Car Park

Another promising but tricky proposition, regularly cited in our research, is the art deco-fronted, Grade II listed Soho landmark formerly owned by NCP, which still leases a few spaces on the ground floor to accommodate the Teslas and Porsches of the area's media executives and property tycoons.

Given the long-term decline in central London traffic it is not surprising that the building was sold by its previous owners in 2013, although its current usage remains somewhat of a mystery. Despite a Westminster Councillor assuring us that "the landlord doesn't want to engage", we decided to see whether we could find out more in person.

Greeted by a pair of security guards at the gates, we explained the nature of our inquiry and provided them with a copy of our letter of credentials, signed by SNF, TSS and SBA. When asked whether we might have a quick look inside, they politely but firmly declined, and called down a woman from the upper floors of the building to talk to us. She explained that although the building was no longer in use as a public car park, its upper floors were used from time to time to stage events such as London Fashion Week. She declined to elaborate on its day-to-day purpose, on the grounds that "they're called private companies for a reason."

We did, however, ascertain that the building belongs to a company called The Vinyl Factory, which also owns Poland St Car Park and 180 The Strand, among other properties, and whose owner is a developer and investor in a number of Soho House Group (SHG) ventures. In addition, the building's [website](#), features pictures and write-ups of various exhibitions, performances and other events from 2014 and 2015, all of which were held on the building's cavernous 3rd floor, but nothing more recent.

As the building extends approximately two blocks north from Brewer St, with loading bay entrances on both Peter St and Ingestre Place, it is not unreasonable to suppose that **it might include one or two spaces that could be used as waste consolidation points** without impacting negatively on the car park, offices and exhibition area mentioned above. It may be that the owner plans to redevelop the property along similar lines to other SHG assets, in which case, presumably, the aforementioned WCC waste planning guidance regarding internal waste consolidation would apply. Given SHG's inextricable links with Soho, and the company's membership of SBA, we believe that there is a conversation to be had, albeit perhaps through alternative/informal channels.



The potential for a combination of consolidation centres and smart bins

In order to illustrate the potential coverage that could be achieved by creating two consolidation points and/or three smart bin locations, the following map of the largest waste generators in our survey (in red) has been overlaid with markers showing the potential coverage zones of consolidation points in the Brewer St NCP car park and under Soho Square (both shown in dark blue). Smart bin locations at St Anne's Church Yard, Romilly St and in the Bateman Buildings are shown in cyan. The size of the circles represents estimates of the maximum distance that businesses would be prepared to take their waste, based on discussions held during the course of our research.



WCC AND WASTE IN SOHO

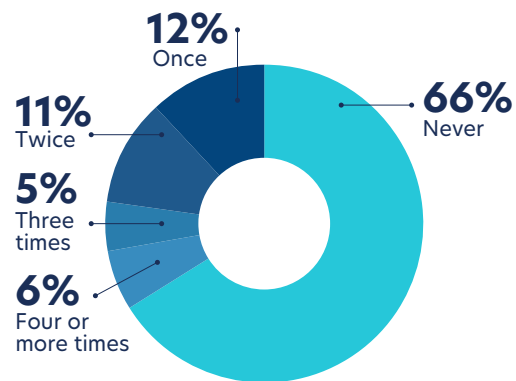
Dissatisfaction with WCC's level of engagement

Many focus group participants expressed **dissatisfaction with the role of WCC in managing Soho's waste**, and although this is not necessarily evidence of any shortcoming on the part of the local authority it does indicate that there is a perception of inaction.

In order to explore an opinion expressed by some business operators during focus groups that WCC was insufficiently engaged with businesses on the issue of waste management, we asked respondents to our business survey about the types of interaction they had had with WCC regarding waste.

When asked if they had been visited by a waste management official from WCC in the last 3 years, fully **two-thirds replied that they had not been visited at all**.

As indicated by the graph on the right, relatively few businesses had been visited by a WCC waste official. This is despite the fact that 42% of businesses indicated that they had been subject to enforcement action in the last 3 years.

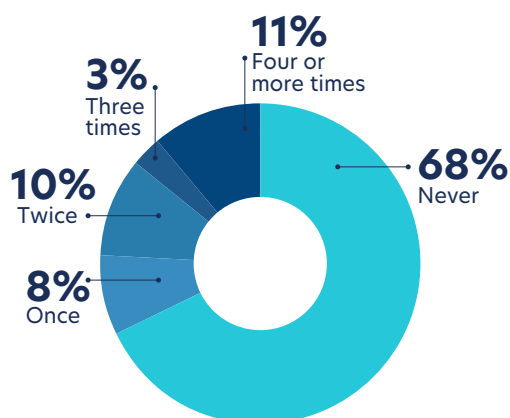


I use the City of Westminster because they're cheap, they're cheaper than anybody... and if an independent operator leaves a bag of my rubbish on the street I get fined. If (WCC) leaves a bag of rubbish on the street, I don't get fined

Hotel operator

You try phoning up Westminster and tell them that there's been rubbish there for three days... someone comes along, puts a sign on it, they rummage through it and they want to fine you... It's not mine

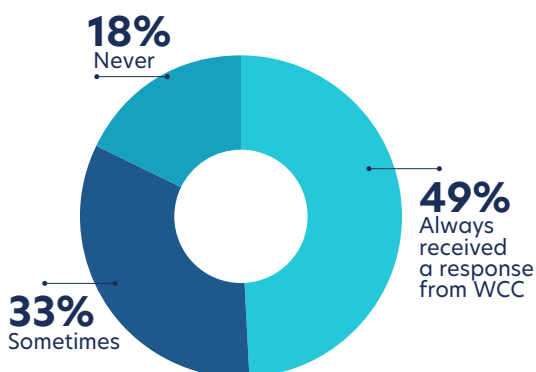
Salon owner



Many FG participants also expressed a view that WCC was not sufficiently responsive to complaints about waste management issues, and we tested this by asking survey respondents how often they had complained to WCC about a waste management issue in the last 3 years.

As illustrated in the graph on the left, approximately **32% of businesses had complained one or more times, but of those who had complained, less than half said that they had always received a response.**

Approximately 18% of businesses who said that they had complained about a waste issue reported receiving no response at all:



We plotted locations of businesses that reported submitting complaints onto a map of our target area to look for patterns.

As shown in the map the right, which shows businesses that have complained once (yellow), twice (orange) or 3+ times (red), there is a wide geographical spread. Certain areas did show a slightly higher concentration, however, and these matched trouble spots identified in our street survey.

These were mostly **areas with high footfall and lots of hospitality businesses.**



Enforcement

According to WCC, waste enforcement is a key priority of the City Inspectors who work across the borough. There is regular deployment of officers checking for compliance around waste issues. This is done proactively as well as responding to complaints received. In the last few months of 2021, there was an increased focus on waste enforcement across the city, including in Soho, and overall waste enforcement action increased by over 300%.

One Westminster Councillor we interviewed pointed to the **link between increased enforcement action and a migration of businesses to using Veolia** as their waste collector, highlighting the subliminal added value of using “the Council” compared to other providers.

Litter and refuse: council responsibilities to keep land clear

Councils have a duty to keep public land clear of litter and refuse in accordance with a [code of practice](#). The code of practice was published by DEFRA in April 2006, modified in September 2019 and last updated in February 2022. Further guidance can be found [here](#).

In summary - councils can issue community protection notices (CPNs) to require businesses or individuals to clear litter from around their premises and take steps to prevent future littering. It is an offence to drop litter on land or into water that is accessible to the public, even if it is private land. Litter droppers can get fixed penalty notices (FPNs). If they don't pay the FPN they can be prosecuted. FPNs aren't appropriate for people who leave their rubbish out for collection at the wrong time, someone who drops litter accidentally (or other cases where it is not in the public interest to enforce regulations, or for repeat offenders (who should be prosecuted)

A council litter authority, which includes London Boroughs such as Westminster, can be taken to court if they don't keep publicly accessible land that they're responsible for clear of litter and refuse. A litter authority can avoid court action if they clear the land within 5 days of being notified.

Spotlight: Highlights of discussions with WCC waste enforcement officers

“Inspections are 24/7. Night shift is 7pm to 7am weekends, 9pm to 7am weekdays.”

“We smash it in the night and hand out a lot of notices. After 3am we find the most offenders.”

“The black bags we would normally go through to find out who has dumped them, but since Covid no one wants to open them. When people have, they've found positive Covid tests in them, nappies and stuff so no one is doing that.”

“The black bags are just assumed to be local residents or fly tipped so WCC clears them up anyway.”

We are unable to confirm whether or not the perception that Veolia customers are less likely to be fined is accurate, but we did find in the survey that **businesses who bought their refuse bags from Veolia were approximately 5% less likely to have been the subject of enforcement action in the last 3 years.** It should be noted that this is an extremely basic correlation, however, and should not be taken to imply that the views expressed about enforcement by focus group participants are correct.

Westminster City Council refutes the assertion that it deliberately allows its own customers to get away with bad waste behaviours while enforcing against others who use other companies, saying that “This ... is based on anecdotal answers from interviews and not on data analysis. It is untrue that the council deliberately allows its own customers to get away with bad waste behaviours while enforcing against others who use other companies. The council enforces against any business who is not complying with environmental legislation and policy.”

Issues with WCC pricing of services

According to one waste collection service provider we spoke to, “the problem is entirely of WCC’s own making, because they are taking money from a public service (residential waste collection) and using it to subsidise something that the private sector has to compete for (commercial waste collection), so you have the cheapest recycling service in the entirety of the UK in the part of the country where it is most expensive to deliver those services. That’s why you get ‘cowboy’ companies, using dirty, polluting vehicles and cutting corners, because they’re trying to compete with artificially low prices.” This viewpoint was also expressed in similar terms by others we spoke to, and while we are unable to verify the accuracy of this assertion, it is clear that a perception exists in some quarters that WCC and Veolia have distorted the marketplace for waste collection services in Soho.

It should be noted, however, that Westminster City Council strongly refutes this allegation, saying that the council “operates its commercial waste service legally and fairly, in line with the Environmental Protection Act 1990. We cannot enforce against other waste operators in the area (this sits with the Environment Agency). The inference that the council is deliberately creating problems for Soho is untrue.”

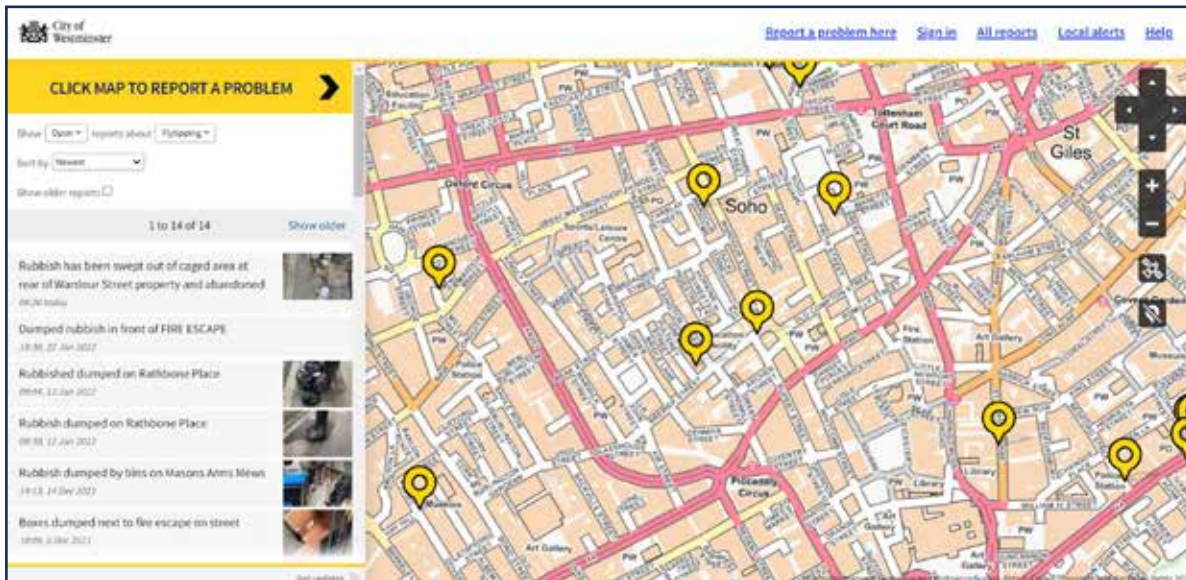
Reporting waste issues directly to Westminster City Council

Although very few people mentioned them during the course of the project, there is an online ‘Report It’ website and apps such as ‘FixMyStreet’, available to encourage the reporting of waste issues directly to Westminster City Council.

Report It

Any street problems in Westminster, such as fly-tipping, potholes, abandoned vehicles or graffiti can be reported on the ‘Report It’ area of the WCC website. According to the website, 270 issues were reported in the period preceding the conclusion of this project, with almost 70,000 updates on reports. It is not clear how many of these are waste-related, but we noted several recent but closed incidents reported in and around the project focus area.

Although recent incidents are featured on the homepage, presumably to encourage others to report their own, it appears that the majority of data collected is only available to be viewed by WCC officers and Councillors, making it difficult to assess the true effectiveness of the scheme. As previously noted, however, we did notice that **many participants in focus groups were unaware of the existence of the website.**



Council Waste Planning Guidance

Any new developments in Westminster, including those in Soho, are prevented through WCC's planning permission process from relying on WCC's public realm to manage their waste. How WCC expects these new developments to manage their waste is set out in the Waste Planning Guidance which was published in January 2021 and updated in September.

During the course of the project, we spoke to the general manager of a new hotel development in Soho who confirmed that they had been informed of this requirement and would be adhering to the guidelines.

We also spoke to a serving Westminster Councillor who told us that it is now WCC policy for **all new developments to include internal waste consolidation facilities**. This could, in theory, also be used to service neighbouring businesses. Despite a number of high-profile developments having been completed in the area in recent months, the Councillor's view was that the area's relatively low level of new development means that there would not be sufficient additional capacity coming on-stream in the next few years to have any meaningful impact on the problem.

CIL Funding

The Community Infrastructure Levy (CIL) is a charge on new development to help fund strategic and neighbourhood infrastructure in Westminster. This can include new or improved facilities for health, education, open spaces, sports and leisure, utilities and waste, transport and the public realm, and other social & community facilities.

Under CIL legislation, the neighbourhood portion must be spent on:

- The provision, improvement, replacement, operation or maintenance of infrastructure; or
- Anything else that is concerned with addressing the demands that development places on an area. This could include things such as new open space, cycle/pedestrian routes, strategic transport infrastructure and community facilities.

The council has agreed a CIL Spending Policy Statement that sets out the criteria against which it will judge applications. To be approved for funding, projects must:

- Be in line with Westminster's priorities and policies – they must address the principles and policies set out in Westminster's development plan and other relevant strategies.
- Support growth – they should support the growth of the Neighbourhood Area and Westminster as a whole.
- Be supported by the community – they should have demonstrable support from a cross-section of the community.
- Be cost effective – they should represent value for money and be delivered in a timely manner.
- Be supported by infrastructure providers – they should be supported by the organisation who will be delivering the project, including the relevant council department.



KEY RECOMMENDATIONS

How can the amount of street waste be reduced?

Most people we spoke with during the course of the project expressed a deep passion for Soho and its “vibrancy”. There is, however, a sense that the issue of rubbish on its pavements is putting a strain on this relationship, leading to frustration and risking staining Soho’s reputation. We received calls from some respondents for a total ban on waste on the streets. This report stops short of recommending this but we would suggest that the Soho Neighbourhood Forum and partners look into the practicality of this approach, considering that a number of businesses do not have on-site storage. There is currently limited alternative provision, as well as the wider issue of the economy and already empty shop fronts.

The following recommendations build on the Soho Neighbourhood Plan (summarised in Appendix A), supported by a great deal of evidence gathered during the course of this project and case studies from around the world. The recommendations are designed to address the complex issue of waste head on, providing suitable, sustainable, alternative provision to ensure that businesses can flourish and that residents, customers and other visitors can continue to enjoy the unique delights of ‘A Cleaner, Greener, Healthier Soho’.

We have split our recommendations into two categories. The first includes proposed solutions that will reduce the amount of waste on streets in Soho directly, and the second category includes solutions that will reduce the amount of waste created in Soho. These are summarised below, along with suggested next steps and which organisations should be responsible for the subsequent implementation over the next two years:

Recommendation	Next steps	Responsible
A1. Employ a Waste Engagement and Enforcement Officer for Soho	Agree funding with WCC and other partners, if required. Approximate cost of £42k p.a.	SNF to lead discussions with WCC and other partners and provide a ‘home’ for the Officer
A2. Install cost-effective, fibre-optic connected CCTV at key fly-tipping trouble spots	Agree the locations to site the CCTV and how to fund and operate with WCC and other partners, if required. Approx cost of £6k p.a. per location for installation and monitoring	SNF to lead discussions with WCC and other partners
A3. Conduct a review of routes and timings, including the possible abolition of one of the collections, or its replacement with a dedicated recycling collection	WCC to conduct a review with Veolia and other waste carriers supported by the SNF Waste Officer	WCC / SNF

Recommendation	Next steps	Responsible
A4. Embark on an education campaign to deter fly-tipping and encourage more recycling	WCC to ramp up an evidence-based education campaign supported by the SNF and other partners	WCC / SNF
A5. Make customer specific QR codes on waste and recycling bags mandatory for waste collection companies operating in Soho (or preferably Westminster as a whole), to allow traceability and identify non-compliant businesses	WCC to conduct a review with Veolia and other waste carriers. Cost should be minimal, as some waste service providers are already doing this	WCC / Waste Providers / SNF
A6. Identify small-scale/'mobile' consolidation points, to be fed by hand-drawn carts/electric bikes	WCC to conduct a review with Veolia, other waste carriers and local businesses, supported by the SNF Officer	WCC / Waste Providers / SNF
A7. Look to reduce the number of waste providers	WCC to conduct a review with Veolia, other waste carriers and local businesses, supported by the SNF Officer	WCC / Waste Providers / SNF
A8. Introduce Consolidation points in strategic locations	WCC to conduct a review with Veolia, other waste carriers and local businesses, supported by the SNF Officer	WCC / Waste Providers / SNF
A9. Continue the roll-out of electric vehicles to 100% (eRCVs, cargo bikes, etc)	Waste providers to continue the roll-out. WCC to provide charging infrastructure where required	WCC / Waste Providers / SNF
A10. Introduce smart bins	WCC, supported by the SNF Officer, to identify optimal locations and procure smart bins. Approx cost of a smart bin £1,100 p.a. or £22 per week per smart/solar bin	WCC / SNF
A11. Promote the use of an app (existing or new) to support the reporting of waste issues	WCC to promote the app with support from the SNF Officer and an appropriate digital marketing campaign	WCC / SNF

Key actions to reduce the amount of waste produced in Soho include:

Recommendation	Next steps	Responsible
B12. Review the BID model and assess whether appropriate for Soho, with the aim of ensuring better overall management (Included in this section because it is a longer-term objective)	SNF to explore the appropriateness of forming a BID with other partners, including The Soho Society and Soho Business Alliance	SNF / TSS / SBA
B13. Undertake a Land Registry check to identify all current property owners within Soho with the aim of improving collaboration on matters such as waste (Included in this section because it is a longer-term objective)	The SNF Officer to carry out initial research to identify the main property owners beyond Shaftesbury plc and Soho Estates, with support from WCC	SNF / WCC
B14. Set-up water bottle refill stations	The SNF Officer to engage with hospitality and retail businesses and WCC	SNF / WCC / hospitality and retail businesses
B15. Encourage the use of reusable cups	The SNF Officer to engage with local retailers and WCC	WCC / Waste Providers / SNF
B16. Encourage more reuse / repair	The SNF Officer to engage with local retailers and WCC	SNF / WCC / retailers
B17. Encourage the use of food sharing across Soho	The SNF Officer to engage with hospitality and retail businesses, residents and WCC	SNF / WCC / hospitality and retail businesses / residents
B18. Encourage the use of sustainable packaging	The SNF Officer to engage with hospitality and retail businesses, and WCC	SNF / WCC / hospitality and retail businesses

This section provides further detail on each of the proposed recommendations outlined in the tables on previous pages, as well as providing relevant case studies from elsewhere.

Solutions that directly impact the amount of waste on Soho's streets include:

A1. Employ a Waste Engagement and Enforcement Officer for Soho

Having a dedicated person or team focused on waste management, as local Business Improvement Districts (BIDs) do, should help to improve the problem of waste significantly.

In 2020, a CIL application to WCC was submitted by SNF, with support from SBA, Shaftesbury Plc, Soho Estates and the New West End Company (NVEC), among others, for a "Waste Monitoring and Enforcement Officer for Soho". Among the proposed Officer's duties and responsibilities were to be:

- Undertake direct engagement with businesses to ensure all expectations around presentation of waste and waste management are clear
- Undertake enforcement where there is repeated non compliance; i.e. issuing Fixed Penalty Notices and/or considering prosecution
- Gather information that can feed into medium/long-term conversations about improving waste collection in the Soho Area

It was suggested in the CIL application that the annual cost for the Officer would be around £42k and that they could be based out of the Soho Society office in St Anne's Church.

Although ultimately unsuccessful (due, we understand, to the Council's view that an individual, however useful, does not constitute "infrastructure", as specified in the CIL legislation) we believe that **the functions highlighted above are crucially important to addressing the issue**, as highlighted in this report.

If WCC is unable to fund the whole cost through CIL then the key stakeholders should consider how they can contribute, as an investment in the area.

A2. Install cost-effective, fibre-optic connected CCTV at key fly-tipping trouble spots

To support the effective management of waste and avoid fly-tipping we recommend that cost-effective, fibre-optic closed-circuit television (CCTV) be installed at key fly-tipping hot spots. We understand that WCC has decommissioned all CCTV cameras in Soho, but we are aware of other boroughs in London making effective use of such systems for waste management monitoring and **we would urge the relevant parties to consider CCTV as an option.**

Key hotspots, according to our street monitoring and input from those interviewed, include:

- The junction of **Meard St and Wardour St**
- The junction of **Frith St and Old Compton St**
- The **south side of Romilly St**

Monitoring of the CCTV could be carried out by the Waste Engagement and Enforcement Officer to support their role. One could also consider combining the two aspects in a subsequent bid for CIL funding, given the requirement that the application should include infrastructure. The initial cost of such a CCTV system with five cameras would be around £6.5k, with an ongoing cost of around £300 per annum for 10GB of data.

Spotlight: Fly-tipping Reduction through CCTV in Haringey

Fly-tipping costs Haringey taxpayers £3million a year to clean up. To help address the issue, Haringey Council looked to invest in a CCTV system that would both increase surveillance coverage and provide a visual deterrent in the areas most frequently blighted by fly-tipping. Haringey deployed several wireless CCTV cameras in the areas with the highest occurrences of fly-tipping. Each of the cameras has been fitted with an audio voice-down and blue light alarm system that warns anybody caught fly-tipping that they are being recorded. The cameras are redeployable and can be quickly moved to new locations if the issues in one location are solved or new requirements emerge.

The cameras have had an immediate impact, helping Haringey Council secure several prosecutions. Furthermore, utilising the audio and blue-light alarm system has helped successfully deter instances of fly-tipping, helping to reduce clean up costs and prevent environmental damage. Those that still fly-tip may well find themselves on Haringey Council's so-called 'Wall of shame' which asks the public to identify those caught fly-tipping on camera. Given the increase in prosecutions and reduction in clean-up costs, the cameras were described by Council Chiefs as having "paid for themselves".

A3. Conduct a review of routes and timings, including the possible abolition of one of the collections, or its replacement with a dedicated recycling collection.

The Soho Neighbourhood Plan (Recommendation 54) also suggests a review of the time slots, and as discussed earlier in this report, **the current scheduling may not be convenient for businesses and could be incentivising non-compliance.**

We would also recommend that reducing the number of time slots (in addition to rescheduling) should be considered. The general thinking expressed in our qualitative research is that removing one of the collection slots would reduce traffic movements. It was also suggested that a 'little and often' approach, with small, electric vehicles collecting bags more frequently throughout the day could actually exacerbate the situation, rather than improving it. The Soho Neighbourhood Plan (Recommendation 21) also suggests "Westminster City Council should ensure that new planning consents for all development include a condition that limits deliveries and waste collection to take place only between 7am and 11pm." in order to reduce noise. All of these issues add complexity to the issue of scheduling, but they should be considered.

"The majority of Westminster's current time-banding system has been in place for several years and accommodates the needs of all waste producers as much as possible", WCC told us, adding that "if residents or businesses can demonstrate widespread local support for a change of times/services then the Council would seek to support these changes, subject to affordability/practicality issues, and responses received to the proposed changes by known waste management companies operating in Westminster".

Spotlight: Dynamic waste collection in Groningen, Netherlands

With the Internet of Things (IoT), an intelligent network of receptacles is created by equipping bins with smart chips, or sensors. The data collected reveals fill rates or the time of the last collection, for example. This results in a more efficient process for waste collections, which can be planned in real time, based on the data. At the very least, waste collections can be based on fill levels. Dynamic waste collection responds to the amount of refuse that can change week to week, or even day to day.

The information collected gives a better understanding of how rubbish in any location is produced and how it can be managed. Resources can be targeted more efficiently.

In Groningen, through dynamic waste collection. By only collecting filled bins and using optimised routes, they were able to increase volume collected per hour by 20%-25%, increase filling degree from 45%-55% to 75-85%, and reduce total mileage over a week by 35%. The project was so successful that a truck was removed from service, and the purchase of two new trucks was cancelled.

A4. Embark on an education campaign to deter fly-tipping and encourage more recycling

Such a campaign could be targeted at both businesses and residents, and could include a 'waste induction' for new tenants at the start of their occupancy to explain the rules, including multilingual materials where necessary.

Social campaigns aimed at ensuring compliance can draw on a number of communications techniques to incentivise engagement from target audiences. **Campaigns built on shaming viewers into compliance can be effective**, as indicated by a number of the case studies in this report. Another approach, 'social proof', is a communications persuasion technique based on the principal that **people will listen to information that comes from people similar to them**. In this case, this could involve a campaign featuring local business owners talking about how they don't get fined because they follow the rules. A number of studies have shown that showing how people similar to the viewer are 'good citizens' can have a real impact.

Spotlight: 'Let's SCRAP fly tipping' campaign in Sutton

The 'Let's SCRAP fly tipping' campaign was launched in October 2020 under Sutton's 'Spick & Span Sutton' banner that aims to boost civic pride in the area and keep the borough's residential roads and high streets looking their best. Let's SCRAP fly tipping aims to educate residents about:

- The scale of the challenge - Sutton Council collects around 700 tonnes of fly tipped waste every year;
- The different types of fly tips, from large-scale commercial fly-tips to donations left outside closed charity shops;
- The cost of dealing with the problem;
- And how to dispose of waste, particularly large items, responsibly.

Phase 1 of the Lets SCRAP fly tipping campaign targeted 10 known hot-spots across the borough. Temporary banners and signs were installed and 'Council aware: fly tip under investigation' stickers were attached to any fly tips found in these areas. This was all supported with a comprehensive social media campaign.

Visual monitoring of the ten target locations took place before, during and after the campaign and the number of fly tip reports submitted to the Council were analysed. There was a significant reduction in fly tipping reports in seven out of the 10 target locations. Reports of fly tipping reduced by an impressive 84% in one location alone.

A5. Make customer-specific QR codes on waste and recycling bags mandatory for waste collection companies operating in Soho (or preferably Westminster as a whole), to allow traceability and identify non-compliant businesses

Both First Mile and Biffa told us they already use this technology on a spot-check basis, with every roll of bags having a unique QR code which is allocated to the customer at the time of purchase, so for Veolia and others to do likewise (if they are not yet already) should be a relatively straightforward process.

A6. Identify small-scale/'mobile' consolidation points, to be fed by hand-drawn carts/electric bikes

Notwithstanding concerns raised earlier about the impact that introducing more small vehicles could have on the total volume of vehicle movements in Soho, as well as legal considerations involved in transferring waste between vehicles, we believe that this should be considered.

We believe there is a common-sense case for setting aside formerly paid parking spaces at strategic locations throughout Soho in favour of medium-sized cage vans, parked during the appropriate collection time bands, as a means of reducing the time that (legally presented) bags spend on streets.



A7. Look to reduce the number of waste providers

Ahead of the upcoming procurement exercise, SNF/SBA/WCC should **consider the reduction of the number of waste providers in order to reduce the number of refuse collection vehicle (RCV) movements and thus improve air quality and congestion**. This should also consider appointing a 'preferred provider' for a food collection service as recommended in the Soho Neighbourhood Plan (Recommendation 60).

The SNP (Recommendation 53) suggests 'Westminster City Council should establish the number of current recycling service providers and frequency of collections within Soho in order to reduce and optimise the number of vehicle movements and make service provision easier to understand (collection times, full bins and fly-tipping reporting etc). This should be followed by setting up preferred provider schemes to reduce the number of vehicles carrying out waste collections, as has also been successfully achieved in Bond St.

As mentioned earlier in the report, our quant survey of 124 businesses identified 17 waste companies operating in the focus area. Some people interviewed have suggested reducing the number of providers down to one, although we would suggest that this proposal is not feasible given the large mix of residents and businesses and their differing requirements and types of waste produced. Another proposal by a representative of The Soho Society was to reduce to one or two carriers in addition to WCC's contractor of choice. A Transport for London 'waste consolidation' [guide](#) published in May 2018 based on the NWECC Bond St scheme, could be a useful reference document.

Spotlight: Preferred Supplier Scheme on Bond St

As is the case in Soho, the Bond St area suffers from traffic congestion and environmental pollutants from the many commercial vehicles travelling to and from the street for delivery and servicing activities. Together with New West End Company (NWECC) and Westminster Council, Transport for London launched the Bond Street 2018 Public Realm Strategy to address these issues. As part of this, a vehicle reduction scheme was launched, aiming to increase the number of shoppers and ensure the commercial success of Bond St by reducing the number of delivery and waste vehicles by 50 per cent and reducing emissions by 10% (from 2014 levels).

Research found there were 47 suppliers of waste collection vehicles operating on Bond St at the time. Potential operators were analysed on criteria, such as price, sustainability and flexibility, with two suppliers selected: Veolia and First Mile. By December 2015, more than 239 businesses on Bond St used First Mile and 82 businesses used Veolia, 73% of Bond St businesses. There was a 67% reduction in waste left on the street, waste vehicle movements fell by 97% (from 144 to nine per day) and a reduction of circa 75% in carbon dioxide equivalent (CO₂e), nitrogen oxides (NO_x) and particulate matter (PM₁₀).

A8. Introduce Consolidation points in strategic spots

According to the Westminster Council RRP, there is a target to encourage BIDs and other groups to expand or franchise waste consolidation schemes but this is on hold due to the pandemic. Evidence from nearby BIDs such as HOLBA (see [case study](#)) show that consolidation can be very effective.

This point on consolidation schemes was also raised in the Soho Neighbourhood Plan (Recommendation 28 and 52) which proposes:

- Transport for London, Westminster City Council and major landowners should support initiatives to pilot and adopt freight consolidation and waste collection reduction measures in Soho. Initiatives such as the West End Buyers Club and other preferred provider schemes should be widely supported to help reduce vehicle movements. Initiatives in the restaurant and hospitality sectors are especially needed as a priority to help reduce light van movements.
- Westminster City Council should review on-street paid parking bays and in the absence of other suitable locations reduced as necessary to provide additional space for suitably designed on-street waste and recycling storage containers to reduce bags of rubbish and cardboard left on the pavement. These should be well designed and have clear signage to indicate who can use them, suitable access technology to prevent freeloading, control the correct materials they should be used for and address how issues such as full bins and fly-tipping can be notified, and enforcement processes followed.

The SNP (Rec 59) also encourages WCC to ensure that new developments comply with Westminster's 'Best in Class' Waste Storage Requirements. WCC confirmed to us that the Council "broadly support(s) waste consolidation" but that it favours a city-wide approach "which we think would be the most efficient system environmentally," adding that "without government legislation changing, we don't have the power to progress anything collectively yet but we hope to get news on this soon."

When asked how many consolidation points might be needed to properly deal with Soho's waste, one Councillor we spoke to reckoned "**between six and twelve.**" They also suggested that the majority of these might be outside the boundaries of Soho itself, with promising sites already identified in Mayfair and Fitzrovia.

Spotlight: Smart Waste Management - optimised collection points

Singapore uses an artificial intelligence-based geo-information system to select the optimum collection points for waste and recycling. This means that 80% of all Singapore residents live within a maximum distance of 500m from their nearest collection point. The collection points have containers in which electric waste, batteries and lights are collected separately. Collection is funded by producers and importers, who pay a fixed fee, as well as a surcharge for each kilo of recycled waste.

Spotlight: Containers vs kerbside waste collection in Portugal

In Portugal, separate collection of glass waste began in the 1990s with large containers where people could deposit used glass. This system was then extended to containers for paper, cardboard and lightweight packaging waste. Such systems are the dominant type of separate waste collection in Portugal, but there are some cases of kerbside collection, for example in western Portugal, where a private company operates alongside the container system. The company collects recycling which has been left outside homes in plastic bags.

The study looked at two neighbourhoods that used a mixed system; glass waste must be dropped off at containers and kerbside collection takes place weekly for packaging and paper/cardboard only. Despite the kerbside collections, residents also drop off a proportion of other waste in containers. The researchers compared this mixed system (A) with a scenario in which all non-glass waste is collected at kerbside (only glass is taken to containers) (B), and a scenario where all waste is taken to containers (C).

The environmental impact of each scenario was analysed using the life-cycle assessment technique, with impacts in six categories calculated by the researchers (abiotic depletion, acidification, eutrophication, global warming, human toxicity, and photochemical oxidation). Aspects such as electricity used during processing and vehicle emissions during collections were taken into account.

Results showed that the exclusive container system (C) had the lowest environmental impact in all impact categories. The kerbside system (B) had significant impacts because of the number of plastic bags needed to separate the waste, and vehicle emissions generated during collection. The overall impact of the mixed system (A) was diminished because some waste was dropped off at containers by residents.

The costs of waste collection were also analysed in an economic assessment. Capital, operation and maintenance costs were calculated, for example, the costs of collection equipment, processing and expenses due to landfill tax, along with the revenue from selling recyclable material. The researchers were then able to calculate the cost per route based on the economics of collection; the cost per inhabitant and cost per tonne, based on collection and processing; and the break-even point per route.

Results showed that economically, the container system (C) was also most advantageous, while the kerbside system (B) was the most costly, even though the materials collected in this system were the least contaminated and raised the most revenue.

A9. Continue the roll-out of electric vehicles to 100% (eRCVs, cargo bikes, etc)

Anticipated benefits from electrification of transport, including waste collection, include improved air quality, reduced CO2 emissions, reduced noise, reduced resource consumption, and fuel and technology savings

At the moment more waste electric vehicles are hitting the roads across London, the UK and beyond, but there is still some way to go. During the course of this project we also saw the first electric vehicles hit the streets of Soho and **we recommend all providers move to electric and to other sustainable forms**, particularly in Soho, as quickly as possible.

Spotlight: Electric RCVs

City of London

The City of London Corporation will be the first UK authority to run a full fleet of Electric Refuse Collection Vehicles (eRCVs).

These five new zero-emissions trucks, the first of which arrived at Guildhall on 4 March 2021, collect waste and recycling from residents of the Square Mile without contributing to air pollution in the local area. In contrast to the traditional diesel rubbish trucks, the new 18 tonne and 26 tonne ERCVs are powered by lithium-ion batteries. These are designed for the short routes you typically find in urban environments, and each of the City ERCVs are able to complete a full route on a single battery charge.

Greenwich

The Electric Refuse Collection Vehicle (eRCV) project has repowered the first, electric, zero-emission 26-tonne Refuse Collection Vehicle in the UK. The end-of-life diesel vehicle was repowered to run with an electric engine and hydraulics system, operating in the Royal Borough of Greenwich alongside its diesel counterparts. The eRCV offers significant CO2 reductions over diesel fleets as well as significant noise reduction benefits. Compared to a diesel RCV that is double shifted and does a 50 mile/day route, the pure electric vehicle gives a savings of 35-tons of CO2e per year.

The project was partially funded by Innovate UK, led by MagTec, with consortium partners of the Royal Borough of Greenwich and DG Cities. With annual sales of new refuse vehicles in the UK around 1250/year, the potential for UK wide emissions savings is significant.

Spotlight: Electric bicycle rubbish collection in Amsterdam

Amsterdam has started a pilot project collecting garbage with electric bicycles. As part of the experiment, residents can choose between existing municipal services or three cycle collection times per week. The dumpster cycles collect five different types of waste: paper, glass, textiles, small electrical appliances and organic waste.

A10. Introduce smart bins

Recommendation 55 of the SNP states that “Westminster City Council should adopt within Soho a ‘smart’ bin monitoring system to help to optimise the movement of the collection vehicles to empty them and ensure that bins that are full do not become fly-tipping locations.”

As has been experienced elsewhere, benefits of smart bins include:

- Improve efficiency by using the resources available in a more focused and targeted way.
- Reduce the number of bins required, thus decluttering and improving the street scene.
- Drive down carbon emissions by enabling street cleaning crews to know which bins need to be emptied.
- Support recycling-on-the-go by encouraging residents and visitors to put the right thing in the right bin
- Can help to optimise the movement of collection vehicles and avoid fly-tipping.

Smart bins have also been used in a number of world leading smart cities including Amsterdam, Barcelona, Melbourne, New York and also London. Introducing smart bins in the right places around Soho should also satisfy another SNP recommendation (Rec 56) for an increase in the number of litter bins and recycling bins to reduce street littering and food packaging waste and a so-called ‘magnet effect.’

A11. Promote the use of an app (existing or new) to support the reporting of waste issues

Encourage residents and businesses within Soho to post fly-tipping issues on the Report It website/app. This could be accomplished by way of a targeted digital communications campaign promoting app installs.

Spotlight: Smart bins

Australia

New solar powered rubbish bins that can hold seven times more than any other have been rolled out across all major Australian cities. The bins also send an email alert to collectors when they are at 85% capacity and ready to be emptied. They have been rolled out in cities in Adelaide, Melbourne and Sydney after initial trials to reduce costs and emissions from rubbish trucks. Melbourne City Council reported the upgraded bins have reduced the average weekly collections by over 80% i.e. from 27.5 collections per week to 5.4 per week, reducing the amount of fuel emissions from rubbish trucks. They also wrote each bin costs about \$6000 (~£3,000) and hold 560 litres of rubbish compared to a standard public bin which holds 80 litres.

Seoul, South Korea

South Korea produces solar-powered, smart waste bins which allow cities to monitor the level of waste in each bin. In Seoul, the country's capital, 6000 automated bins are equipped with scales and Radio Frequency Identification (RFID) capable of weighing waste when it is deposited and charging the residents accordingly by using an ID card.

Sutton, London

New 'smart' recycling litter bins have been installed in Sutton that will help residents and visitors to the borough recycle on-the-go. The new solar-powered 'BigBelly' bins have been installed by Sutton Council and its environmental solutions provider, Veolia.

Cans, plastic bottles, glass bottles, newspapers and magazines can all be placed in the green recycling bins. Everything else (including disposable coffee cups, plastic bags and food waste) must be placed in the black general waste bins.

The bins automatically crush down the recycling so they can stomach eight times more waste than a standard litter bin. They contain sensors that send automatic alerts to Veolia's street cleansing teams when nearing full capacity, increasing the team's efficiency and reducing vehicles on the road. The bins are also complete with a foot pedal option, enabling people to safely dispose of their rubbish hands-free.

Key actions to reduce the amount of waste produced in the first place include:

B12. Review the BID model and assess whether appropriate for Soho with the aim of ensuring better overall management

Several participants in focus groups and depth interviews noted the absence of a BID in Soho, and while there are challenges to creating one, a successful effort could yield significant benefits in enabling greater coordination on waste issues.

B13. Undertake a Land Registry check to identify all current property owners within Soho with the aim of improving collaboration on matters such as waste

As mentioned earlier in this report, one of the challenges of Soho is the wide array of property owners and complex ownership structures. As a precursor to examining a possible BID, we would recommend an exercise involving a Land Registry investigation to identify all owners.

B14. Set-up water bottle refill stations

The average Londoner uses 175 plastic bottles a year. Two thirds of plastic bottles are consumed on the go, most of which are not recycled. Water bottles make up nearly half of all plastic drink bottles found in the Thames.

The SNP highlighted this topic in Recommendation 58 which requested that Westminster City Council should set-up water bottle refill stations in key locations in Soho such as St Anne's Churchyard, Soho Square Gardens, Golden Square Gardens, Ramillies St/Place and encourage TfL to do so at tube stations. **WCC should actively promote adoption and usage of the free water Refill scheme** as has been done in other London boroughs.

Spotlight: Refill London

Supported by the London Mayor, Refill is working with over 24 individual boroughs (and counting) to be the agent for change by empowering their local communities to take action against single-use plastics.

Refill does this by signing up businesses as Refill Stations to the Refill app, getting the Refill sticker in windows, encouraging people to carry a reusable water bottle, and by hosting local events to raise awareness.

B15. Encourage the use of reusable cups

Recommendation 59 in the SNP asks Westminster City Council to work with takeaway coffee shops to encourage them to provide discounts for using reusable cups and encourage them to fund dedicated coffee cup recycling bins situated inside their premises. It should as a matter of priority **extend the coffee cup recycling scheme trialled in Victoria and recently deployed in the Heart of London Business Alliance** area to Soho.

B16. Encourage more reuse/repair

Encouraging a culture of reuse and repair and promoting good examples within the area such as Nudie Jeans should help to enhance the independent character of Soho and build community as well as helping the environment.

Spotlight: 'No-waste' Japanese village

The residents of a remote village on the Japanese island of Shikoku have spent almost two decades reusing, recycling and reducing, united behind a mission to end their dependence on incinerators and landfill as the world struggles to tackle the climate emergency and the plastic waste crisis.

Household waste must be separated into no fewer than 45 categories, before being taken to a collection centre where volunteers ensure items go into the correct bin, occasionally issuing polite reminders to anyone who forgets to take the lid and label off a plastic bottle or remove nails from a plank of wood.

Items still in good condition end up at the Kuru Kuru recycling store, where residents can drop off or take home merchandise (mostly clothes, crockery and ornaments) free of charge.

In 2016, Kamikatsu recycled 81% of the waste it produced, compared to a national average of just 20% and similar to that across Westminster. The small number of items that have proved impossible to recycle, including leather shoes, nappies and other sanitary products are sent to an incinerator outside the village.

B17. Encourage the use of food sharing across Soho

There are a number of programmes and initiatives currently underway in the UK and elsewhere to promote food sharing, and this can have a dramatic impact on the amount of food waste that is thrown away by food and beverage businesses.

Spotlight: Food sharing*Olio*

OLIO connects neighbours with each other and with local businesses so surplus food can be shared, not thrown away. This could be food nearing its sell-by date in local stores, spare home-grown vegetables, bread from a baker, or the groceries in someone's fridge when they go on holiday. OLIO can also be used for non-food household items too.

The platform works via an app, which allows users to list goods they have available and also to search for things that have been listed.

FoodSave by Sustain

Sustain worked on the FoodSave project to help small and medium-sized food businesses in London to reduce their food waste.

FoodSave followed the principles of the Food Waste Hierarchy, helping businesses first to reduce their food waste, then to consider options for redistribution of surplus food (for example through secondary markets or charities such as Fareshare, or by feeding it to livestock), and finally to ensure that unavoidable food waste is disposed of more responsibly, such as through composting or generating energy.

B18. Encourage the use of sustainable packaging

A programme to encourage the use of sustainable packaging could have a dramatic impact on the amount of waste generated in Soho.

Spotlight: Sustainable Packaging

An Increasing number of packaging companies are testing alternative source materials for their petroleum-based plastic products, such as seaweed and fish scales.

This ranges from start-ups (and scale-ups) such as MarinaTex to multinationals such as DS Smith.

Companies are also researching the potential of other natural fibres such as straw, hemp, cotton, bagasse (pulpy residue left over after the extraction of sugarcane juice) and cocoa shells for packaging purposes.



APPENDIX A- The Soho Neighbourhood Plan: 2019-2040

A key part of the Soho Neighbourhood Plan (SNP) focuses on waste, as summarised in this Appendix.

The eighth objective of the Soho Neighbourhood Plan is:

'To reduce the amount [of] waste left on the street by encouraging better facilities for recycling and waste management within premises and supporting the increased provision of dedicated food waste recycling.'

[p16, Objectives of the Plan, The Soho Neighbourhood Plan: 2019-2040]

Key recommendations

There are eleven recommendations related to waste in the Soho Neighbourhood Plan as summarised in the table below:

Recommendations	Timescale	Reasoning
21: Westminster City Council should ensure that new planning consents for all development include a condition that limits deliveries and waste collection to take place only between 7am and 11pm.	Immediate and ongoing	The World Health Organisation and other academic and medical studies show the importance of sleep and preferably uninterrupted sleep to mental health and well-being. Westminster City Council planning policy and the conditions attached to planning consent should be mindful of this objective to ensure that night-time noise is not increased by development and wherever possible, reduced.
28. Transport for London, Westminster City Council and major landowners should support initiatives to pilot and adopt freight consolidation and waste collection reduction measures in Soho. Initiatives such as the West End Buyers Club and other preferred provider schemes should be widely supported to help reduce vehicle movements. Initiatives in the restaurant and hospitality sectors are especially needed as a priority to help reduce light van movements.	Immediate to Long	Development activity increases and intensifies the use of space within Soho yet the public realm to provide access and services to it such as streets and pavements stays broadly the same and so has a fixed capacity. To prevent further congestion measures need to be taken to eliminate unnecessary vehicle movements.
52: Westminster City Council should review on-street paid parking bays and in the absence of other suitable locations reduce as necessary to provide additional space for suitably designed on-street waste and recycling storage containers to reduce bags of	Medium to Long	The amount of kerbside space in Soho is limited and heavily used for deliveries and collections. Rubbish dumped in bags onto pavements, many of which are narrow, is a longstanding problem. The Forum wishes to see much better

<p>rubbish and cardboard left on the pavement. These should be well designed and have clear signage to indicate who can use them, suitable access technology to prevent freeloading, control the correct materials they should be used for and address how issues such as full bins and fly-tipping can be notified, and enforcement processes followed.</p>		<p>performance in preventing waste dumping and littering and a much higher percentage of waste separated so that it can provide economically viable materials for recycling. Occupiers producing waste must be able to dispose of their waste and recyclables in sustainable ways and WCC should investigate and promote innovative new ways to manage the problem and where necessary use part of the existing space made over to paid parking to achieve these objectives.</p>
<p>53: Westminster City Council should establish the number of current recycling service providers and frequency of collections within Soho to reduce and optimise the number of vehicle movements and make service provision easier to understand (collection times, full bins and fly-tipping reporting etc). This should be followed by setting up preferred provider schemes to reduce the number of vehicles carrying out waste collections as has also been successfully achieved in Bond Street.</p>	<p>Immediate to Medium</p>	<p>See details of the Bond Street scheme promoted by NWECC, as outlined earlier in this report.</p>
<p>54: Westminster City Council should review and update the time slots for waste and recycling bags being put out on the street to ensure that vehicle movements for Westminster City Council's municipal waste and recycling collection company's vehicles are minimised.</p>	<p>Immediate to Medium</p>	<p>Reducing HGV compactor vehicle movements will help to improve air quality, reduce noise nuisance and make the collection of waste more effective.</p>
<p>55: Westminster City Council should adopt within Soho a 'smart' bin monitoring system to help to optimise the movement of the collection vehicles to empty them and ensure that bins that are full do not become fly-tipping locations.</p>	<p>Immediate to Medium</p>	<p>Smart bins provide important data to the council and Veolia to target when and where bins need emptying.</p>
<p>56: Westminster City Council should seek to reduce street littering and food packaging waste in Soho by increasing the number of litter bins and recycling bins in a number of locations within the area which have none. Provision in all</p>	<p>Immediate</p>	<p>Waste which is disposed of in litter/recycling bins reduces the need for manual and mechanical street sweeping. Events such as Pride cause huge amounts of waste which can disfigure the area for a</p>

the public open spaces should be increased as a matter of priority. When such large-scale events as Pride are licensed there should be a requirement for the licence holder to provide very large waste and recycling bins intensively in the area affected by the event.		long time after the event and are environmentally unsustainable as large amounts of single use plastic, bottles, can and paper waste are mashed together by the press of people which make them unrecyclable. The polluter pays principle should be adhered to.
57: Westminster City Council should ensure those proposing development are aware of Westminster's 'Best in Class' Waste Storage Requirements.	Immediate	See link
58: Westminster City Council should set-up water bottle refill stations in key locations in Soho such as St Anne's Churchyard, Soho Square Gardens, Golden Square Gardens, Ramillies Street/Place and encourage TfL to do so at tube stations. WCC should actively promote adoption and usage of the free water Refill scheme.	Medium	See link Single use plastic water bottles are resource intensive and wasteful and the need for water on the go should be increasingly supplied by water refill stations.
59: Westminster City Council should work with takeaway coffee shops to encourage them to provide discounts for using reusable cups and encourage them to fund dedicated coffee cup recycling bins situated inside their premises. It should as a matter of priority extend the coffee cup recycling scheme trialled in Victoria and recently deployed in the Heart of London Business Alliance area to Soho.	Immediate	See link
60: Westminster City Council and Veolia should establish a food waste 'preferred provider' collection service and market it to Soho's commercial food and drink related premises. This should use suitably adapted vehicles to reduce spillages and where possible be powered by electric vehicles or hybrid vehicles to reduce polluting emissions.	Immediate to Medium	By default this should be the Westminster/Veolia service See link

Three other recommendations in the Soho Neighbourhood Plan which could have a bearing on waste collection are 33 and 34:

Recommendations	Timescale	Reasoning
14: Westminster City Council should carry out an assessment of the current visitor numbers to Soho including planned annual public events (e.g. Pride and Record Store Day), to ensure that sufficient publicly accessible toilet provision is made as part of development to enable further licence applications to be granted without increasing street fouling and enhance public amenity.	Immediate and ongoing	Anti-social behaviour in the form of street fouling is on the rise across Soho, correlating to a decrease in the number of public toilets across Westminster. Planned public events and an increase in the number of licenses need to be mirrored by an increase in adequate public amenity provision.
27: Westminster City Council should facilitate the early installation of at least 50 on-street electric vehicle charging points that are affordable, reliable and offer open access. They should continue to increase provision as the use of electric vehicles increase. Of the initial fifty, 10 should be in paid-for parking bays, 10 in designated residents' parking bays, 10 in designated loading bays and 10 each in the garages at Poland Street and Brewer Street. These garages may also be suitable locations for some rapid charging installations. Electric vehicle car sharing clubs should be promoted and encouraged.	Immediate to Medium	Major changes in the fuels used to power vehicles is necessary if air quality in the West End is to improve. A major barrier to take-up is the perception that there is not a sufficient re-charging infrastructure. In order to facilitate the change to electric motive power WCC should lead the way in providing additional electric charging capacity.
29: Westminster City Council together with landlords and occupiers should seek to restrict or redirect online shopping deliveries/returns to specific locations to reduce vehicle congestion.	Immediate to Long	Given the area's high number of employees, online shopping which often offers so-called 'free' deliveries, usually by small vans, is an important source of congestion. Measures to change behaviour among the 650,000 employees who work in the West End and have deliveries made to their place of work in an uncoordinated way are important if congestion is to be reduced.
32: Westminster City Council should support traffic calming in Soho's narrow streets. These also tend to have narrow pavements and high pedestrian use. Investment should be made by Westminster City Council to resurface	Immediate to Long	There are no simple solutions and the approach should be based on 'street by street' and 'activity by activity' assessment of the measures that will practically support this aspiration. Soho's narrow street pattern

<p>appropriate streets with high quality, robust, level shared surfaces built so that pre-existing public pavement space can withstand the same axle weights as the carriageway. In doing this it will be important to ensure basement vaults are protected. The carriageway should still be delineated by indicative 'kerbstones' and the carriageway asphalted or otherwise treated to make clear the line of the actual carriageway.</p>		<p>increases the risk of congestion and means that in order for the traffic to flow, whilst some vehicles are parked to make deliveries, others pass them with one set of wheels on the pavement. This results in costly paving slabs often breaking, rocking and becoming a hazard for pedestrians very quickly. As an example, in North Berwick Street in May 2018 expensive and lengthy repaving works have all had new paving slabs cracked within a few weeks of being completed. This is neither value for money nor a sustainable solution. Shared surfaces will improve the ability of vehicles to pass others without pavements being constantly broken and degraded as at present.</p>
<p>33: Transport for London and Westminster City Council should review those buildings and sites which have the potential to offer opportunities to consolidate and distribute freight more sustainably. These bodies, alone or with suitable partners, should trial the reuse of underused space in local car parks for transfer from delivery vans to 'to the door' delivery on foot or by bicycle/tricycle.</p>	<p>Immediate</p>	<p>Soho is intensely commercially developed and there are no opportunities to develop new sites for freight consolidation centres other than pre-existing multi-storey car parks. Demand for car parking has reduced as a result of the Mayor's Congestion Charge and is likely to reduce further following the introduction of the Ultra-Low Emissions Charge. These buildings have the potential to incorporate new uses which help to make the traffic modal shift required to reduce both air pollution and congestion. The City of London Corporation is using former car parks as an innovative way to consolidate freight and WCC should follow suit and protect these garages in the short term from change of use to other commercial uses so that these new ways of delivering goods and freight can be piloted. It should be noted that the delivery company DPD has recently received planning consent at Q Park, Hyde Park Corner for such a centre so this is an indication of the potential demand.</p>

34: Westminster City Council should sign all entry streets to Soho as 'no entry' for vehicles over 7.5 tonnes, except for access in order to prevent large vehicles taking shortcuts through the area.	Medium	Unfortunately, a number of satellite navigation systems still direct traffic through Soho rather than around it and the Council should engage with the providers to change these systems. However, there is nothing in this recommendation to inhibit theatre show 'get-ins and gets outs' and other special activities involving increased delivery and supply needs, such as live broadcasts.
35: Westminster City Council and Transport for London should support the shared use of pavements for loading/unloading where they are wide enough. These areas should be remodelled to provide shared surface loading bays whilst also remaining usable by pedestrians.	Immediate to Medium	In suitable locations and following careful assessment the pavements should be widened to both give more space for pedestrians and to include shared surface loading/unloading bays where the street width allows. Potential opportunities are on the west side of Wardour Street between Shaftesbury Avenue and Winnett Street; further up Wardour Street on the west side outside numbers 143 and 145; along the whole length of Old Compton Street there are opportunities to widen pavements and incorporate shared surface bays, on Noel Street south side outside numbers 14 to 21a. All proposed locations will need a detailed layout assessment. There should be an assessment of the entire length of Great Marlborough Street to see where pavements can be widened, and bays incorporated.

Other relevant sections

5.2 Traffic Congestion and Freight Consolidation (p46) Policy 22: Delivery Consolidation Points	A. Proposals for freight micro-consolidation and last mile delivery centres will be supported within the Soho Neighbourhood Area. B. Redevelopment proposals for use of all or part of the car parks at Brewer Street and Poland Street for freight micro-consolidation and/or last mile delivery centres will be strongly supported.
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Algerian Coffee Stores	Compton News	House of Minalima	Paper Round
Amathus Drinks	Comptons of Soho	Humble Chicken	Paradise Soho
Ann Summers	Court Security	I Camisa & Sons	Paragon Dental
The Arts Theatre Club	Criss Cross	Inamo	Patty & Bun
AULIS London	The Crown Estate	Japes	Pepe
B Bagel Soho	Cuts	Joyce's Jerk Joint	Pix Pintxos
Balans 60	Dean Street Studios	The Karma Sanctum Hotel	Pizza Express Soho
Balans Cafe	Dean Street Townhouse	Kova Patisserie	Pizza Pilgrims
Baozilnn	The Dog & Duck	La Bodega Negra	Platform Post Production
Bar Shu	Dolby Europe Ltd	Laxsa	Poppie's Fish & Chips Soho
Barrafina	EL&N	Lipsync Post Ltd	Porchetta Pollo Bar
Ben & Jerry's	First Mile	Little Italy	PresoTea
Biffa	The French House	Little Ku	The Prince Edward Theatre
Big Bite	Frith Street Tattoo	Live True London	Prix Fixe Brasserie
Biju Bubble Tea Room	G-A-Y	Lobos Meat & Tapas	Prowler Red
Bistro 1	Garlic & Shots	The London Salon	Regulation
Burger & Lobster	The George	Lords of Poké	The Resident Soho
Busaba	Gerry's Wines & Spirits	Maître Choux	Ronnie Scott's Jazz Club
Cafe Boheme	Glenison	Make Mine	Royalty House
Cafe de Nata	The Golden Lion	Nando's	Ruby's Soho
Canwood 55	Good Housekeeping Institute	Neat Burger	Rudy's Pizza
Capital Shop Limited	Gravity House Post Production	The Nellie Dean	Runway East
CBRE	Hazlitt's Hotel	New West End Company (NVEC) Ryness	
Cecconi's Pizza Bar	Hobson's Fish & Chips	Never Fade Factory	Salon 64
Ceviche Soho	Honest Burgers	No 79 (Dean St)	Seduire Soho
Chick'n	Hongdae Pocha	Nudie Jeans	Shaftesbury Plc
Chotto Matte London	Honi Poké Soho	Old Compton Brasserie	The Ship
Clone Zone	Hoppers Soho	100 Wardour Street	Simmons Bar

Smiths Salon	Soho Neighbourhood Forum	St Moritz Restaurant & Club	The Toucan
Snappy Snaps Soho	Soho Parish Primary School	Stüssy	Triple Two Coffee
Snowflake Soho	Soho Residence	Studio 12 London	Truffle Burger
So High Soho	The Soho Society	Sussex	Veolia
The Soho Business Alliance	Soho Square Studios	Suvlaki	Village
Soho Estates	Soho Theatre	Tamarind Kitchen	The Vintage House
The Soho Hotel	SOLA	Tavuuk Gemuse Soho Doner	Wacky Barbers Soho
Soho Housing Association	Special Delivery	Tortilla	Westminster City Council

Conclusion: A cleaner, greener, healthier Soho

Soho has a lot going for it. So much so that the Soho brand has been reused by cities and companies around the world including in Hong Kong, Málaga and New York City.

As well as being a significant tourist destination for the millions who visit London every year, this square mile (2.6 km²) area bounded by Shaftesbury Avenue to the south, Oxford St to the north, Regent St to the west, and Charing Cross Road to the east, is also home to around 3,000 residents, and countless bars, restaurants, theatres, shops, film studios and offices.

However, a deep concern and frustration among most people we spoke to during the project is the level of waste left on the streets, which threatens to tarnish this global brand as well as impacting adversely on the health and well-being of residents, visitors, businesses and their customers. This concern led the Soho Neighbourhood Forum, comprising residents and local businesses, to commission this work, with the support of other local partners such as The Soho Society, the Soho Business Alliance and some funding from Westminster City Council.

This report, 'Soho Comes Clean', sets out 18 key recommendations to ensure that Soho stays true to its global brand and the aspirations of all stakeholders for Soho to be 'cleaner, greener and healthier' while not losing the "vibrancy" which makes the area so unique. This report builds on the progress and increased collaboration evidenced during the course of the project, such as the increased roll-out of electric vehicles, as well as previous reports and studies, including the Soho Neighbourhood Plan.

As a team, our relationship with Soho goes back many years. We therefore look forward to the implementation of the recommendations over the coming months and will be on hand to continue our support, enabling Soho to become also renowned for being one of the 'cleanest, greenest, healthiest' places in the world. ■

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**We need
joined-up
thinking...
but if everyone
works together,
we can make a
difference.**

Resident

