

Reducing Fly Tip & Littering Strategy

Restoring Pride in Harrow



Contents

1. Introduction	3
2. Aims	3
3. Partnerships	3
4. The law and our responsibility	4
5. Hotspots	4
6. Who fly tips in Harrow?	6
7. Who is dropping litter in Harrow	8
8. Action taken by Harrow	10
9. How can residents help?	10
10. Our Approach	10
11. How will we measure our success?	11
12. Action Plan	12
Appendix 1 – Fly tip trends	16

1. Introduction

This strategy is set within the council's vision of Restoring Pride in Harrow. This vision is underpinned by three priorities:

- ***A council that puts residents first***
- ***A place that is clean and safe***
- ***A borough that supports those in need***

Reducing fly tipping and littering in the borough is fundamental in ensuring a borough that is clean and safe. And a lot of work is already underway. Fly-tipping and littering blights communities and left unchecked can become a barrier to creating homes and communities where people choose to live.

The fly-tipping and littering strategy sets out our aims and priorities over the next three years.

2. Aims

The aim of this strategy is to tackle fly tipping and littering across the borough in line with our commitment to restore pride in the borough. We will work in partnership to improve intelligence led joint working between services, partners and the community to ensure that we will together deliver two key outcomes:

- 1) Reducing the number of fly-tips and litter
- 2) Increase resident satisfaction with street cleaning by significantly reducing resident perception that fly-tipping and litter is a problem in their neighbourhood

We will do this by:

- Increasing enforcement, being intelligence-led, with zero tolerance
- Addressing the causes of fly tipping and littering
- Removing fly tips quickly
- Making fly tips and littering easier to report.
- Early intervention including promoting civic pride.
- Working with local communities and partners to increase awareness of fly-tipping and littering problems, the cost to residents and traders in collecting and disposing of fly-tips and the negative impact that fly-tipping creates for their local area.

3. Partnerships

Partnership working is fundamental in delivering this strategy. We will continue to work with our key partners to tackle fly-tipping including:

- Police
- London Fire Brigade
- Environment Agency
- Residents (Ward panels, resident associations)
- Schools
- Businesses
- Business Improvement District (BID)

- Waste Services
- Communications
- Community Safety
- Housing
- Licensing (Commercial & Residential)
- CCTV
- Parks Team
- Highways
- Planning

4. The law and our responsibility

Litter is controlled under the legislative framework of the Environmental Protection Act 1990, as amended, (“**EPA 1990**”).

It is an offence to drop or leave litter and not pick it up. It applies to all land that is open to the air, including land covered with water and privately owned land. A person found guilty of dropping litter can be fined up to £2500 in a magistrates’ court. Most offences can be dealt with through serving a Fixed Penalty Notice on the perpetrator by an authorised body such as a local authority or police force. Fixed Penalty Notice charges for littering are set locally at £150.

Litter is generally accepted to be anything below the size of a sack of household waste and is mostly understood as items related to smoking, chewing gum or eating and drinking on the move where unwanted items have not been properly disposed of or have been dropped inadvertently.

Section 89 of the EPA 1990 places a legal responsibility (a ‘duty’) on certain organisations to ensure that land, as far as is practicable, is kept clear of litter and refuse.

There are six ‘Duty Bodies’ – local authorities, statutory undertakers such as rail and road agencies, Crown Estate, colleges, schools and universities. Privately owned land not open to public access is not covered by this responsibility.

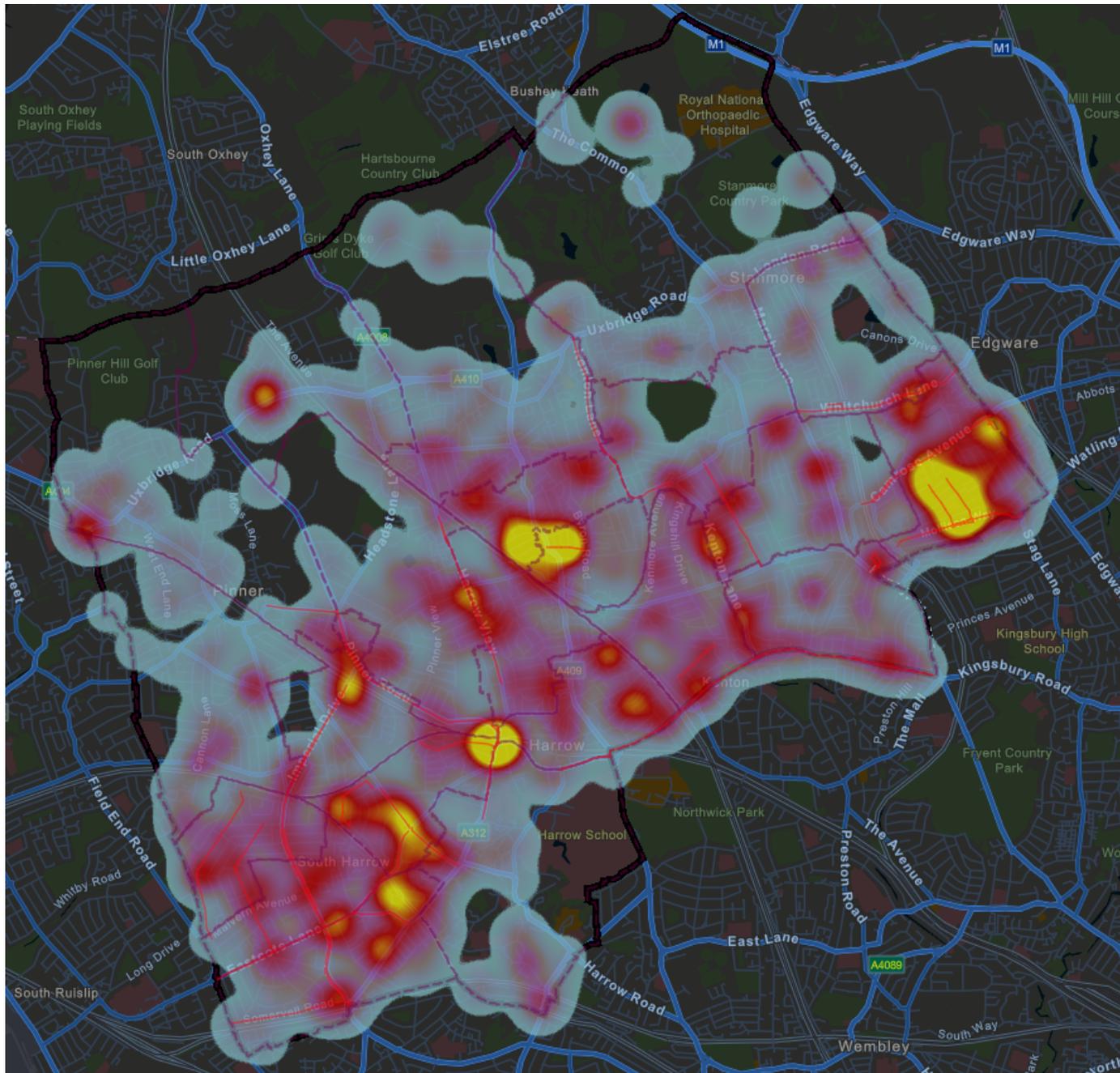
Fly-tipping is the common term used to describe waste illegally deposited on land. The offence of fly-tipping and the additional offences are set out in Section 33 (1) of the EPA 1990. Fixed Penalty Notice charges for fly tipping are set locally at £400.

The waste can be solid or liquid and can vary on scale from the size of a bin bag of rubbish to large scale dumping of construction. There is also an associated offence relating to the unlawful deposit of waste from a motor vehicle, whereby the person who controls or is in a position to control the vehicle shall be treated as knowingly causing the waste to be deposited.

Businesses and residents have a legal obligation, called a duty of care, to ensure that their waste is disposed of in the correct way.

5. Hotspots

It is important that we understand where fly-tipping is occurring most frequently so we can target our resources in the areas affected. This hotspot map outlines the areas in Harrow where fly-tipping is most prevalent in the four-month period of 01/12/2022 – 31/03/2023



- The three most significant areas for reported fly tips are:
- Wealdstone Town Centre, Wealdstone South
 - Mollison Way/Cotman Gardens/Constable Gardens, Edgware
 - Vaughan Road, West Harrow

6. Who fly tips in Harrow?

Rubbish from Houses and Flats

Waste Type	Possible Triggers	Possible Factors	Consequences
<p>Little and often black sacks and carrier bags.</p> <p>Single items; mattresses, furniture, toys.</p> <p>Packaging – large pieces of cardboard</p>	<p>Excess rubbish generated by overcrowding or Houses in Multiple Occupation (HMOs).</p> <p>Lack of understanding around disposing of rubbish and dropping rubbish off at regular points; the 'little and often' deposits of rubbish making these areas unofficial collection points such as next to a litter bin or at the street corner.</p>	<p>Transient population with a high turnover of residents</p> <p>Lack of landlord / estate agent responsibility, especially when tenants move out.</p> <p>Lack of awareness that it is an offence to dump rubbish</p> <p>Lack of awareness of authorised waste disposal services, such as those operated by the Council</p> <p>Poor planning design, creating lack of external storage for rubbish.</p> <p>Lack of civic pride, for rented and owned properties.</p> <p>Lack of perception of the risk of being caught and issued a Fixed Penalty Notice or being prosecuted.</p>	<p>Fixed Penalty Notice issued by the local authority of £400</p> <p>By giving your waste to someone else you could still face penalties of up to £5,000 if you don't check that the company or person has a licence to carry waste.</p>

Rubbish from Flats above Shops

Waste Type	Possible Triggers	Possible Factors	Consequences
<p>Little and often black sacks and carrier bags.</p> <p>Single items; mattresses, furniture, toys.</p> <p>Packaging – large pieces of cardboard.</p>	<p>Limited storage to store waste inside the flat.</p> <p>Lack of understanding around timed collections.</p> <p>Culture of leaving waste by litter bins and established unofficial collection points – 'little and often' rubbish deposits.</p>	<p>Storage for rubbish with houses converted into flats or HMO's for houses.</p> <p>Poor planning design, creating lack of internal storage for rubbish for flats above shops.</p> <p>Planning breaches.</p> <p>Lack of civic pride, for rented and owned properties.</p> <p>Lack of perception of the risk of being caught and issued a Fixed Penalty Notice or being prosecuted.</p>	<p>Fixed Penalty Notice issued by the local authority of £400</p> <p>By giving your waste to someone else you could still face penalties of up to £5,000 if you don't check that the company or person has a licence to carry waste.</p>

Business Rubbish from Local Businesses

Waste Type	Possible Triggers	Possible Factors	Consequences
<p>Black bags and carrier bags.</p> <p>Packaging.</p>	<p>Opportunistic – low risk of being caught.</p> <p>Lack of understanding around timed collections.</p>	<p>New staff.</p> <p>No waste contract or underpaying for the amount of waste generated.</p> <p>Small quantities of waste produced and with a small profit margin some businesses take the risk of fly-tipping to cut down on costs.</p>	<p>Duty of care under the Environmental Protection Act 1990 includes a statutory Code of Practice. A breach can lead to a fine if convicted in the Magistrates Court or an unlimited fine if convicted in the Crown court.</p>

Organised Criminal Activity

Waste Type	Possible Triggers	Possible Factors	Consequences
<p>Building material.</p> <p>Large levels of household rubbish.</p> <p>White goods</p>	<p>Lack of awareness amongst householders of their duty to dispose of rubbish properly (duty of care) / available services.</p> <p>Residents do not realise that the business is acting illegally despite taking money for disposal.</p> <p>Using illegal companies to dispose of rubbish, includes house clearances, and waste from DIY.</p>	<p>Opportunistic ways of avoiding collection and disposal costs.</p> <p>There is a perception that they will not get caught and fined or their vehicle seized.</p>	<p>Reports of vehicles used for fly-tipping will be investigated by our enforcement officers.</p> <p>The registered owner can be traced and prosecuted.</p> <p>The Police have the power to seize any vehicle used for this offence. If a vehicle registered to you is used to fly-tip it can be seized and crushed and both driver and the owner of the vehicle can be prosecuted.</p> <p>By giving your waste to someone else you could still face a fine if you don't check that the company or person has a licence to carry waste.</p>

7. Who is dropping litter in Harrow

Waste Type	Possible Triggers	Possible Factors	Consequences
All litter	Lack of awareness of the impact of litter.	<p>Lack of civic pride</p> <p>The increasing disconnect with the natural environment caused in part by alternative pastimes based around technology</p> <p>Increased night-time economy and its impact on less responsible behaviour in urban centres</p> <p>Increased car ownership and improvements in car design separates travellers from the experience of the environment around them</p> <p>Expectations of responsibility for litter clearance</p> <p>Lack of awareness of wider costs of litter</p> <p>Changes in shopping has generated an increase in packaging has led to an increase in waste, whether intentionally or otherwise, some of which ends up as litter.</p>	Fixed Penalty Notice issued by the local authority of £150
Food on the go	Lack of awareness of the impact of litter.	<p>With a move to eating on the go, there is an increase in disposable packaging.</p> <p>Eating/drinking on the go has also become commonplace whilst travelling in a vehicle leading to roadside litter where litter bins would not be an appropriate solution.</p> <p>Eating on the go packaging often has high volume packaging (plastic bottles and food trays) meaning bins fill more quickly.</p>	Fixed Penalty Notice issued by the local authority of £150

		Walking routes to high schools may attract litter if children eat on the go both to and from school and do not dispose of the litter in a bin.	
Dog fouling	Dog ownership is on the rise Lack of awareness of the impact of litter.	Lack of clarity as to when, where and how to dispose of dog waste correctly.	Failure to clear up properly after dog fouling causes specific additional concerns around health of people, livestock and wildlife Fixed Penalty Notice issued by the local authority of £150
Cigarettes and Vapes Alcoholic beverage containers Legal high container	Lack of awareness of the impact of litter. Incorrect belief that cigarettes decompose	Evening socialising on the street with stimulants such as nicotine and alcohol, where the main focus is on the socialisation and stimulant and not the correct disposal of litter. Where one person in a group does not dispose of their litter correctly it may encourage others to do the same.	Fixed Penalty Notice issued by the local authority of £150

8. Action taken by Harrow

In Harrow fly-tips are investigated where evidence is available, this includes evidence from local residents who may have witnessed the incident.

Harrow engages with both internal and external stakeholders and has strong relationships with key partners. We target hotspots, by sending out a highly visible enforcement officers to look at several enforcement issues at the same time e.g. fly-tipping and checking for business waste transfer contracts. Where we have evidence enforcement action will be taken against a fly-tipper.

Harrow also has a highly visible team patrolling the Borough looking for evidence of littering, where littering is witnessed the officers, will where appropriate, issue fixed penalty notices to the individual who dropped the litter.

Over 2,000 fixed penalty notices were issued for littering in 2022/23. The majority of these related to discarded cigarettes.

Over 600 fixed penalty notices were issued for fly tipping in 2022/23.

Almost 500 fixed penalty notices were issued to businesses for failure to comply with their duty of care under the EPA 1990.

In advocating the safe disposal of waste. Harrow Council encourages the use of the council's recycling services including the HRRC at Forward Drive.

9. How can residents help?

Residents play a pivotal role in assisting the council in locating and informing the council on fly-tipping incidents, often being the first reporters.

Reporting via the web form ensures the swiftest response from the service and allows the council to track the reported incident through to completion.

<https://www.harrow.gov.uk/streets/fly-tipping>

We strongly advise that residents do not go through dumped waste as this has the possibility of both posing a hazard to the resident and may harm the quality of the evidence which may be gathered. If a resident has evidence of who fly tipped then this should be reported using the form above which will advise the resident of the next steps in relation to enforcement action.

10. Our Approach

Our overarching action plan is based on three actions:

- **Early intervention**
- **Prevent Reoccurrence**
- **Targeted Enforcement.**

Two officers will be dedicated as the resource to help achieve the action plan below. These officers will be 100% self-funded by the fixed penalty fines that they generate. This resource will be increased should the team need more resources due to the level of offences found, provided they remain self-funded.

11. How will we measure our success?

Our overall measure of success will be to reduce the total number of fly-tips from their current level.

- Volumes of reported fly tipping and littering
- Time taken to remove fly tips
- Numbers of fly-tip hotspots
- Enforcement Actions Taken: Fixed Penalty Notices (FPNs) issued
- Fixed penalties Notices paid
- Resident satisfaction with fly-tip removal

12. Action Plan

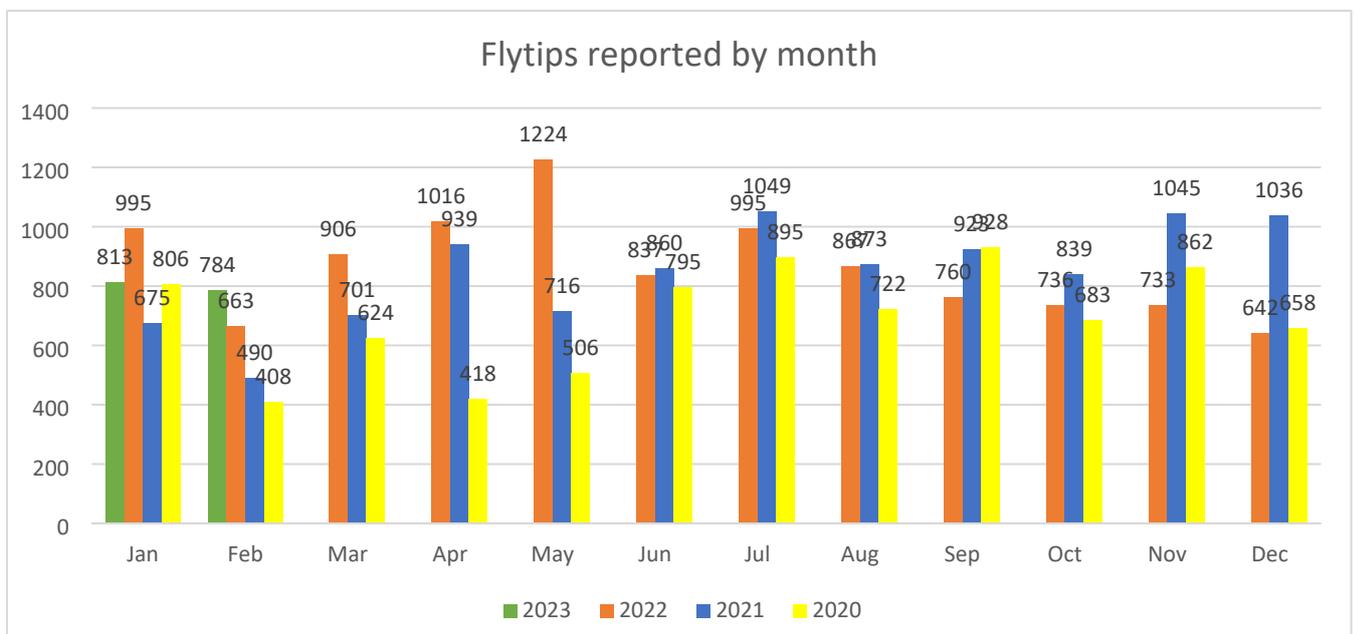
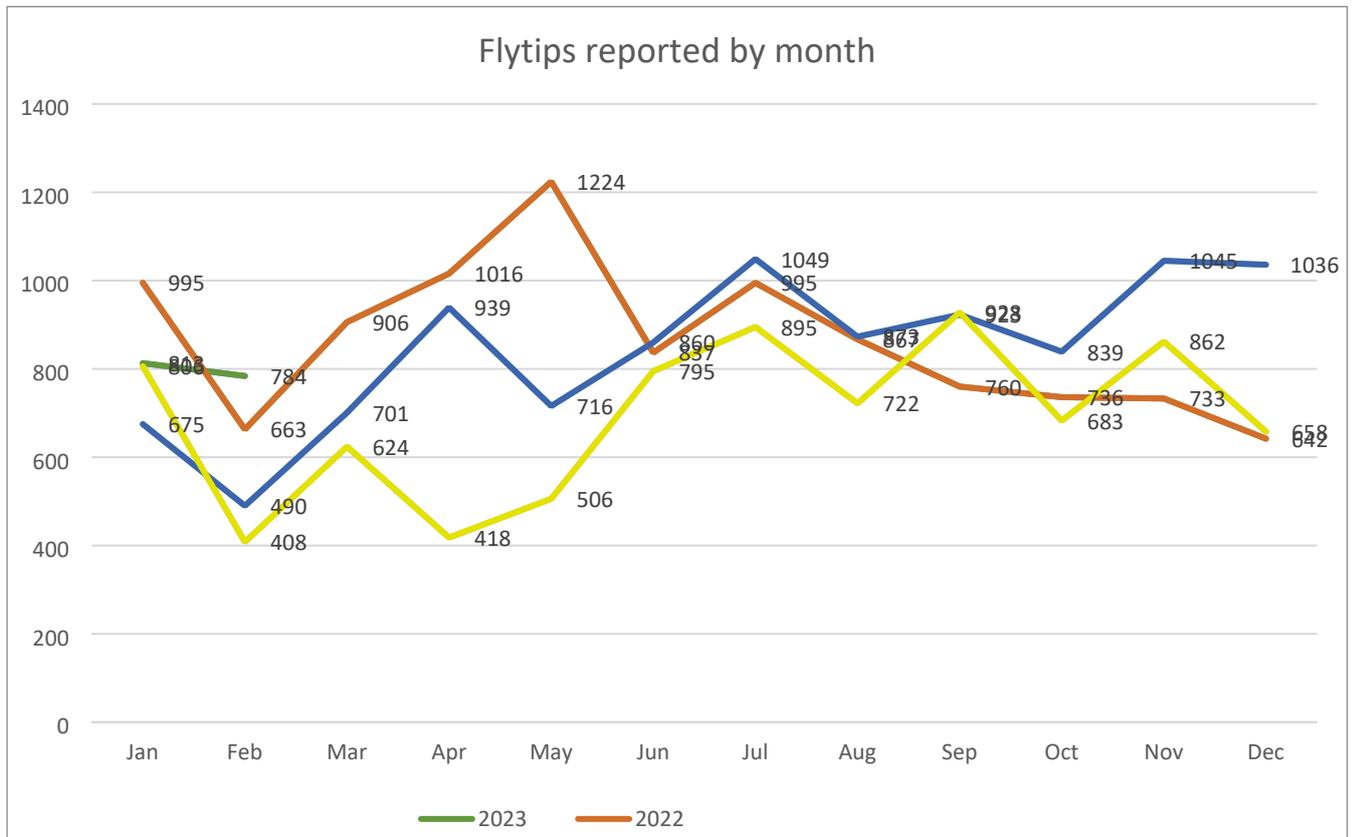
Priority	Action	Detail	Timescale/frequency	Lead
Early Intervention	Awareness raising campaign	<p>The Council's Communications team will be undertaking an awareness raising and behaviour change campaign to support the delivery of this action plan.</p> <p>The long-term campaign will follow a three-part strategy:</p> <p>Deterrence – focusing on the likely perpetrators, providing them with information on how to dispose of waste correctly, as well as alerting them to the punitive consequences of littering and fly-tipping. Tactical communications, such as posters, will be displayed in known hotspots.</p> <p>Empowerment – focusing on residents, raising awareness of the council's programme to tackle fly-tipping and litters with a call to action to use the council's reporting tool. The team will also focus on the user experience, making the process as easy and simple as possible to report online.</p> <p>Reassurance – raise awareness of the successful actions the council has taken, highlighting punitive action taken against perpetrators.</p>	At least quarterly communications over the three years starting immediately	Communications
Early Intervention	Keep Britain Tidy	Explore the value of membership of "Keep Britain Tidy" to access their specialised knowledge and resources	Assessment by May 2023	Licensing and Enforcement
Early Intervention	Engagement Businesses	<p>Attendance at business forums to raise awareness about business duty of care and the consequences of non-compliance.</p> <p>Engagement with the Harrow BID team on how they can work with the Council to get information out to local businesses.</p>	Attend at least three forums a year	Licensing and Enforcement
Early Intervention	Engagement residents	Attendance at ward panel meetings to discuss fly tipping & littering hotspots in the ward location.	Attend each ward panel at least once every six months for the duration of the action plan.	Licensing and Enforcement

Early Intervention	Increasing correct waste disposal	Relaunch of the recycling Service to drive up the rates of recycling. Provide free bulky waste disposal.	Underway	Environmental Operations
Prevent Reoccurrence	Verge Planting Trial	Verge Planting Trial – Look at areas which are regularly affected by fly tipping. Consider whether they are suitable to be dug over to flower bed and planted out with hardy shrubs Letters to be sent to households located in the area around the site to highlight the work undertaken and to raise awareness and generate support for the objective to deter fly tipping in their community.	Identify three possible locations by October 2023	Environmental Operations/ Licensing and Enforcement
Prevent Reoccurrence	Design out hotspots	Joint working between Council Departments to identify where it may be appropriate to designing out the issue of littering & fly tipping hot spots by making changes to the existing environment.	Identify two possible locations by October 2023	Highways/Licensing and Enforcement/ Environmental Operations
Prevent Reoccurrence	Engagement with Businesses	Engaging with charity shops which are experiencing issues with fly tip to support them to reduce fly tips in the doorways.	July 2023	Licensing and Enforcement
Prevent Reoccurrence	Engagement with Landlords and PRS residents	Communications with Landlords of HMOs in the Borough reminding them of their responsibilities Review HMO and selective licence conditions to ensure that these are adequate to ensure that the landlords are responsible for correct waste disposal	Annual communication starting in 2023 March 2024	Licensing and Enforcement
Prevent Reoccurrence	Engagement with residents	Correct bin disposal Information leaflets distributed to residents in hot spot areas.	Commencing May 2023	Licensing and Enforcement
Prevent Reoccurrence	Target issues at hotspot area	Create a holistic action plan for each of the identified top 20 fly tip sites.	March 2023 and reviewed at least every six months	Licensing and Enforcement
Prevent Reoccurrence	Focus activity at location	Use of crime scene tape for fly tips in hot spot areas. These will be photographed, and this will be publicised on social media.	Commencing May 2023	Licensing and Enforcement

Prevent Reoccurrence	Private land	Working with the landowner to ensure that that private land is cleared from fly tip and advise on how to prevent recurrence.	Underway and Ongoing	Licensing and Enforcement
Targeted Enforcement	Intelligence lead	Ensure that the Council website is updated to make sure it is clear on how to report fly tip so hot stops locations can be tracked and addressed in real time Baseline the level of fly tip in each ward. Monitor these to identify new problem area and most prolific areas	Underway and Ongoing Underway and Ongoing Underway and Ongoing	Licensing and Enforcement/Communications/Digital
Targeted Enforcement	Mapping connections between HMOs and fly tips	Hotspot map identifying areas where licensed private rental properties overlap with fly tip hotspots and undertake visits to ensure adequate waste disposal at the properties	Commencing April 2023	Licensing and Enforcement
Targeted Enforcement	Partnership working between internal departments	Sending out enforcement officers with the waste team to known hotspots to find evidence of perpetrators whilst clearing the site	Underway and Ongoing	Licensing and Enforcement
Targeted Enforcement	Weeks of Action	Undertake dedicated weeks of action in fly tip hot spot areas. Actions will include business duty of care inspections, evidence gathering, removing abandoned vehicles, HMO inspections etc	Commencing May 2023	Licensing and Enforcement
Targeted Enforcement	Public Space Protection Order (PSPO) review	Review of current PSPO offences and consideration given to whether these should be retained/extended,	Undertaken and consultation underway in relation to wording of new proposed PSPO.	Licensing and Enforcement
Targeted Enforcement	Deployment of additional CCTV	Re-deployable CCTV – current re-deployable CCTV & plans for more	March 2023 and reviewed at least every six months	Licensing and Enforcement /CCTV team
Targeted Enforcement	Increase fly tip enforcement patrols into evening and weekends	A zero-tolerance approach will be adopted, and enforcement action taken for every fly tip where there is adequate evidence	Underway and Ongoing	Licensing and Enforcement
Targeted Enforcement	Increased enforcement action against unlicensed	Increased enforcement action against unlicensed HMOS and selective licence property	Underway and Ongoing	Licensing and Enforcement

	HMOS and selective licence property			
Targeted Enforcement	Partnership working	Undertake joint working days with police pulling vehicles over and checking waste transfer licenses.	By September 2023, and at least once annually	Licensing and Enforcement
Targeted Enforcement	Task and finish group	A task and finish group will meet monthly to oversee this plan. They will monitor the performance against the measures and intervene if changes are needed.	April 2023 and ongoing	Licensing and Enforcement

Appendix 1 – Fly tip trends



Recent reported fly tips by ward

	Reported Fly tips 1 Dec 2022- 1 March 2023
Belmont	66
Canons	56
Centenary	122
Edgware	319
Greenhill	97
Harrow on the Hill	101
Harrow Weald	99
Hatch End	51
Headstone	106
Kenton East	125
Kenton West	102
Marlborough	94
North Harrow	55
Pinner	55
Pinner South	70
Rayners Lane	88
Roxbourne	83
Roxeth	167
Stanmore	60
Wealdstone North	121
Wealdstone South	97
West Harrow	175