

Deputation to the Transport and Environment Committee meeting on 27 January 2022 regarding item 6.1 Business Bulletin

Introduction

Since April 2021 when the City of Edinburgh Council (“the Council”) made its original decision to impose Communal Bin Hubs right across the New Town, the Council has refused to consult, engage or listen to the residents, their associations, Community Councils and Heritage Organisations.

The Business Bulletin before the Transport and Environment Committee today (“TEC”) is just another example where the Council has, again, failed to listen to experts or those affected by its decisions. Based on lengthy interactions with Edinburgh World Heritage (“EWH”) and Historic Environment Scotland (“HES”), the Council had an opportunity to re-think its extremely unpopular policy and consider some small mitigating suggestions. But it has failed to do so, ignored the advice of these Heritage Organisations and taken a “we know best” approach.

The Business Bulletin misrepresents facts and has not fully explained the Heritage Organisations’ views. The Committee does not even have the opportunity today to debate the minimal amendments proposed by EWH and HES.

The Council have been made aware of the very strong objections there are to the decision to abandon doorstep collection of Gull-proof bags and recycling boxes. A recent survey carried out by Angus Robertson MSP (and Cabinet Secretary for Constitution, External Affairs and Culture) shows that just over 90% of residents do not support the imposition of Communal Bin Hubs. This is supported by our own NTBCC online survey and a recent door-to-door poll on India Street. In addition, the Council’s ‘Information Events’ also demonstrated how opposed the New Town community is to these changes.

However, the Council continues to ignore those it represents.

Before dealing with the details of the Business Bulletin, it is important to remind the Committee, how it reached this current decision in April 2021.

- There was no consultation or even engagement with residents, residents’ associations, and community councils.
- There was no consultation or engagement with Heritage Organisations
- The Council has not conducted any impact assessments, despite the view of experts that such assessment should be carried out. It continues to refuse to conduct such assessments despite request from EWH and HES.

New Town residents support the Council’s ambition of greater recycling, cleaner streets and less pollution. However, the way the Committee is taking these decisions is both undemocratic and lacking in transparency. As the Council will know, only too well, effective decision making involves and does not exclude those that are affected by its decisions.

Committee members will have received last week, our ‘Five-Year plan for Waste Management’ (attached to this deputation). This aims to approach the matter of waste and recycling in an imaginative way and

looks to best practice nationally and internationally. The NTBCC wish to work with the Council to develop a system that not only carries the support of the community but also looks for a long-term and sustainable solution that will not permanently scar the streetscape of this beautiful City.

As a consequence, we are urging the Committee to just take a step back, pause and consider the lasting impact its decision will have on the unique heritage of Edinburgh. Once imposed, the Council will not be able to reverse its decision or if it did – it would again cost millions of pounds. Millions of pounds of public money.

Impact on the World Heritage Site

The Council has repeatedly and publicly stated that it was working closely with EWH and HES to lessen the impact on the streetscape. However, we now learn that apart from a change to the tone of the colour of the bin lids, none of the suggestions proposed by the heritage bodies are to be considered further or even discussed. It is now clear that the roll out of the Communal Bin Hubs will not make any allowance for the existence of the internationally important World Heritage Site. The Council's obligation to protecting (and where possible enhancing) the City's World Heritage Status lies in tatters. In 2017, the Council committed to a duty of care to the World Heritage site and conservation areas when it signed the current five-year management plan. It appears that the Council is failing in its duty.

The Committee should be reminded of the words of those Heritage Organisations, which are charged with protecting Edinburgh World Heritage status:

Edinburgh World Heritage says:

It is worth stating that any major decisions concerning changes to services in local areas should be taken with the consent of the community. While this may not be a statutory obligation in the case of waste disposal, we believe that moving forward without the support of local people and community groups would set an unfortunate precedent for the future.

...we are concerned that the current plan to locate numerous new bin hubs across the New Town represents a threat to the visual integrity of the New Town. Adding street clutter will negatively alter the character of our Georgian terraces. An Environmental Impact Assessment is being considered, which we believe is required.

Historic Environment Scotland states:

It is our view that the proposed roll-out of bin hubs throughout the World Heritage Site has the potential to have a significant impact, particularly within the carefully planned and consistent classical streets within the New Town.

A one-size-fits-all strategy for the wider city, which includes the World Heritage Site will mean that a series of bin hubs will be sited on streets currently without any visible waste collection.

The introduction of standard designed bin hubs in these streets will have a negative visual impact on this part of the World Heritage Site and we would welcome an alternative approach.

Business Bulletin

Turning to the specifics of the Business Bulletin.

Engagement

The Business Bulletin boasts of the number of engagements it has undertaken. However, it significantly underplays the strength of feeling it received at these meetings and the extent to which it has just ignored the views of the Heritage Organisations. For example, the Bulletin refers to 300 people attending the information events and expressing their views. As a matter of fact, there were many more than who attended these sessions but due the number of officials at each and the limitations of the selected venues only a small proportion were able to record their views. The Council's own data (obtained by a freedom of information request) shows that the significant majority of those who did express an opinion were opposed to the current plans. This is consistent with all other surveys that have been conducted and referred to above.

The Bulletin refers to its "detailed discussions" with EWH and HES "to look at mitigating measures to reduce the impact of the bins in the Edinburgh World Heritage". However, the report gives the misleading impression that while it accepts some, it has rejected others. The team has rejected every single measure put forward by EWH and HES with the exception of changing "the tone of the green lids". After hours of discussion, with serious concern shown by these statutory organisations whose remit, among other things, is to protect Edinburgh's World Heritage status and Outstanding Universal Value, the team believes the only improvement that should be made is to make the tone of green lids different.

Equalities Matters

The Bulletin implies concern from the Edinburgh Access Panel and Living Streets Edinburgh to some of the suggested mitigations. We understand the concerns about people with impaired vision having to cross the street to put their waste into a bin but believe that there should be a balanced consideration of the changes. At present people with impaired mobility or vision can place their waste and recycling outside their door for collection – this is surely significantly better than having to take the waste to a Communal Bin Hub. If the proposals are accepted, they will now need to carry their waste to the nearest hub, which could be 100m away from their home and then place it in the bin. Surely the least risk solution is to maintain kerb side collection for as many people as possible. It should be noted that there has still been no equalities assessment been undertaken about the loss of kerb side collection.

The Bulletin states that there cannot be an approach to placing the Communal Bin Hubs on "the garden side/other side of the street" since in the majority of the locations this is not supported by the "agreed parameters" and criteria to site bins across the City. But it is the Council who created these "agreed parameters" and criteria and it must be flexible to preserve the streetscape. No evidence has been provided to support the view that putting the bins on the garden side of the road on a limited number of streets will expose residents to any significant risk.

Pavement Clutter

With regard to the issues of additional pavement clutter caused by the recycling boxes, it should be noted that all 130,000 households that have kerb side collection are putting their waste on to the pavement outside their home for collection. Although we fully support the unnecessary cluttering of our pavements, it is not reasonable to remove everything from the pavement. There is no evidence in this Business Bulletin of eg how many accidents have been caused by Gull-proof bags (hanging from railings) on the pavements on those streets that have kerbside collection.

The recycling boxes and food waste bins in the New Town are generally on the street for a matter of few hours every week. Again, eliminating this short term use of the pavements should be balanced against the need to carry waste to the nearest communal bin where that waste will be stored for a number of days until collected and adds to the street clutter.

It should be noted that residents in the New Town – those affected by these decisions, remain completely in the dark, about all the locations the Council expect to place these Communal Bin Hubs. This is one of the most crucial pieces of information, and yet at the ‘Information Events’ - there was no information given. This is another example where residents and residents’ associations have been kept away from the process and unable to have any meaningful impact.

Zero Waste Hierarchy

The decision of the TEC at its 14 October 2021 meeting that residents should be supported to adopt a zero waste hierarchy has never been explained despite requests for clarification. We now learn that this will be met by including information on waste reduction and re-use in the planned communication campaign. This is an extremely disappointing outcome given the willingness of New Town residents to work with the Council to improve recycling and introduce sustainable waste management arrangements that minimise the impact on the streetscape of the World Heritage site. The Council needs to work more pro-actively with residents to fulfil these goals.

Conclusions

The NTBCC has looked to engage positively with the Council at every opportunity. But it is continually rebutted. The Committee refuses to consider ANY amendments to its policy - even when they are proposed by expert organisations such as EWH and HES. It is now clear from numerous surveys that 90% of residents oppose the replacement of kerbside collection with Communal Bin Hubs.

The Council’s own mock-ups of these Bin Hubs show how overbearing and obtrusive they will be. They will permanently scar the Edinburgh streetscape and the Committee’s unwillingness to consider even the smallest of amendments demonstrates how it appears to be unable to listen and consider other points of views.

We would like the Committee to consider the following questions with respect to its Communal Bin Hub policy:

- Will it achieve the stated goals of improving recycling and reducing safety risks?
- Why has no heritage or environmental impact assessment been undertaken?
- Why has there been no meaningful consultation?
- Why does the Council continue to ignore the views of its residents and heritage organisations?
- Why have not all aspects of the project been subjected to equalities assessment?

- Are we managing our World Heritage site in accordance with our commitments to UNESCO and the commitment the Council undertook in 2017?
- Is this plan the best value for money?

We urge the Committee to take a moment, pause and consider other alternatives. Not for just the sake of the residents it serves but also for the heritage of this City, before it is irrevocably damaged.

Carol Nimmo

Chair – NTBCC

25 January 2022

Waste Management In Edinburgh's New Town: Five-Year Plan Summary

New Town and Broughton Community Council (NTBCC) and the New Town Street Associations are fully supportive of Council's objective to substantially increase recycling rates and improve waste management in Edinburgh. However, we object to the imposition of the 'one size fits all', citywide solution of communal bin hubs on the following grounds:

1. Protection of Heritage and Streetscape has not been properly considered

- The New Town streetscape highlighted in the World Heritage Site Statement of Outstanding Universal Value must be protected.
- The proposal to install fixed communal bin hubs every 100 metres across the New Town is inappropriate and out of step with other UK and international world heritage cities.
- The Council has a duty of care for the World Heritage Site, which it committed to when signing the current five-year management plan in 2017. Any waste management plan in the World Heritage site needs to reflect that commitment.

2. Lack of transparency and evidence that plan will fulfil goals to increase recycling or improve safety

- Use of TRO process rather than Planning has reduced external scrutiny and need for consultation
- No impact assessments have been conducted to support decision to remove kerb side collection.

3. The decision does not carry the support of the local community

- There has been no consultation with local residents, community groups or heritage organisations nor any analysis or consideration of the needs of the New Town population.
- A recent survey conducted by the MSP, Angus Robertson, indicates that 91% of the community are unsupportive of the Council's decision. This figure is consistent with the feedback from the CEC 'information sessions' and NTBCC's own survey.

CEC is right to be looking to improve recycling and waste management in this historic city centre, however we need a collaborative plan, with buy in from the local population which takes account of national and international best practice. The local residents are keen to work with the CEC to find the best solution.

NTBCC and the New Town Street Associations urge the Council to pause and consider our proposed five-year collaborative plan. **The current system works generally well and should not be replaced until a better solution is found.** We request that the Council:

- Agree a five year moratorium
- Improve the current system of gull-proof bags and recycling boxes
- Address any health and safety issues of waste collection
- Collaborate with residents to devise a strategy that meets needs of the community
- Investigate international best practice and pilot new solutions

We urge the Council to work with (and not against) us

WASTE MANAGEMENT IN EDINBURGH'S NEW TOWN

A FIVE YEAR COLLABORATIVE PLAN



NOVEMBER 2021

MORAY FEU, INDIA STREET ASSOCIATION, HERIOT ROW EAST ASSOCIATION, NORTHUMBERLAND AND NELSON ST ASSOCIATION, INCORPORATING ABERCROMBY PLACE, GT KING AND ST VINCENT ST ASSOCIATION, DRUMMOND CIVIC ASSOCIATION AND REGENT, ROYAL, CARLTON TERRACES AND MEWS ASSOCIATION

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Gull-Proof bags on the street for a few hours



Recycling material pre-sorted and collected in hours



Fixed and permanent structures despoiling the character of the streetscape



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EXECUTIVE SUMMARY

The New Town and Broughton Community Council and New Town Street Associations call on Edinburgh City Council to pause the rollout of Communal Bin Hubs in the New Town and work with heritage bodies and communities on a collaborative plan for waste management fit for a World Heritage site.

Learning from best practice in World Heritage cities elsewhere in Europe and beyond, Edinburgh can deliver a world-class waste management system, which improves recycling without damaging the streetscape.

A FIVE YEAR PLAN FOR MANAGING RECYCLABLES AND WASTE IN EDINBURGH NEW TOWN

- 1. Agree a five year moratorium on proposed changes in Gull-proof bag streets** to allow careful review of options suitable for a World Heritage Site and design a world-class system to meet the future needs of Edinburgh.
- 2. Improve the current system of Gull-proof bags and recycling boxes.** Short-term low-cost improvements to the Gull-proof bags and recycling system would buy time to properly explore a new strategy.
- 3. Collaborate and innovate, communicate with local residents and build buy in on recycling and waste collection.** A positive campaign implemented in such a way that informed residents and would build support and understanding for the existing system and any agreed long-term changes.
- 4. Devise the strategy in response to the needs.** Understand the disparate population of the New Town and shape the strategy to meet their needs. These could include prospective legislative changes for a deposit return scheme and changes relating to Short Term Let regulations. Most significantly take account of the need to minimise impact on the historic environment from the outset.
- 5. Address the Health and Safety issues identified by the Council from use of Gull-proof bags.** Undertake risk assessment of overall process for all users of any changes to current arrangements and consult other cities on their experience.
- 6. Encourage and pilot mobile solutions to sorted waste collections.** Explore innovative mobile means of collecting rubbish, learning from experience in other historic sites.
- 7. Investigate practicality and costs of Waste Rooms and Underground solutions** Options appraisal of best long-term solution to rubbish for Edinburgh World Heritage site, learning from experience in other historic cities.
- 8. Work with the Community rather than against us.** If we work together we can improve waste management in Edinburgh and preserve the heritage of the New Town.

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Edinburgh is one of the most beautiful cities in the world and is rightly proud of its historic architecture and unspoiled streetscapes. Working together we can create a solution for waste management of which Edinburgh can be proud.

THE WASTE MANAGEMENT CHALLENGE

Edinburgh needs to improve recycling to hit targets and respond to new pressures of waste generation. The city centre has some of the finest architecture in the world, but its layout and topography are challenging for vehicles and service delivery. Money is scarce. Against that background, implementing a new waste management strategy appropriate for the internationally important streetscape of the World Heritage Site is extremely challenging. How Edinburgh chooses to tackle this challenge will be visible to the world. NTBCC and the New Town Street Associations propose that, rather than continuing to press the Edinburgh-wide “One size fits all approach” inappropriately on to the New Town and World Heritage site, Edinburgh uses this opportunity to develop a world-class approach to waste management.



Edinburgh City Council is right to be looking forward to transform how waste is collected and managed across the City. A World Heritage Site calls for special consideration. There is an opportunity to create a 5-year plan to make, shape and implement a ‘best in class’ waste management process in a historic city to achieve the following goals:

- Pristine streets
- Progressive solutions for a World Heritage site
- An inclusive and environmentally progressive strategy
- Making Edinburgh the leader in sustainable living in a cherished historic city
- Solving shared problems through collaboration

A Conservation Success, which cannot be taken for granted

The ordered elegance of Edinburgh’s New Town led to its designation (together with the Old Town) as a World Heritage Site. The streetscape, buildings and integrity of the New Town are of Outstanding Universal Value.

Edinburgh Council took account of this when introducing communal waste bins originally for much of the City Centre. It was decided to retain individual collections involving gull-proof bags for the 43 streets with the highest architectural quality, including the palace-fronted streets of the New Town. The decision was taken working closely with Historic Scotland (now Historic Environment Scotland) and Edinburgh World Heritage and with considerable consultation with local residents.



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For these 43 Gull-proof bag streets there are no containers permanently on the streets and rubbish is collected swiftly and unobtrusively.

The Management Plan for the World Heritage site stresses the importance of managing the public realm for the integrity of the New Town and also highlights street clutter as a key challenge.

Edinburgh City Council is currently implementing a new LED lighting scheme, which has fittings very carefully designed to be in keeping with the character and streetscape of the New Town. This is an excellent example of how modernisation of a public service can maintain and enhance the streetscape.

With creativity and a proper assessment of the challenges, a waste service can be provided in the New Town without detriment to its character. Failing to take account of the unique streetscape of the New Town in providing public services will undermine the huge conservation success story of the New Town and send a message to residents, proprietors and visitors from across the world that the Council no longer attaches importance to that streetscape. The Council cannot with credibility enforce the necessary conservation measures for the New Town, while at the same time showing so little care for the Outstanding Universal Value of its streetscape.

Current Communal Bin Hub Proposals

Edinburgh City Council has decided to introduce a new Communal Bin Hub Service with the very laudable aim of achieving a step change in recycling. They have also decided to stop the Gull-proof bag and recycling service in the streets, which were previously considered to be too sensitive for communal bins. No special provision is proposed for the Gull-proof bag streets of the New Town and the Council has decided they should be treated in the same way as all other streets.



In making this decision there was no consultation with Heritage bodies, the Community Council or local residents. There was no assessment of the impact of the decision on the streetscape. Despite Historic Environment Scotland stating that the proposed roll-out of bin hubs throughout the World Heritage Site has the potential to have a significant impact, Edinburgh City Council has decided not to do an Environmental Impact Assessment, which means there will be no formal assessment of the impact of the proposals.



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Using the Council's criteria, this would result in Communal Bin hubs in the palace-fronted streets of the New Town, similar to those above. These would be very intrusive and damaging to the streetscape and public realm. An impact assessment of Communal Bin hubs in the New Town compared with the current system involving gull-proof bags is provided at Annex A.

IT IS APPARENT THAT COMMUNAL BIN HUBS IN THE NEW TOWN WOULD INFLICT SIGNIFICANT HERITAGE DAMAGE FOR NO CLEAR RETURN.

Edinburgh has an opportunity to pause and develop a waste management strategy suitable for a World Heritage City. We need a plan that puts Edinburgh at the forefront of good practice based on a strategy that comes from working with local residents and heritage specialists not against them.

PROPOSAL FOR A 5 YEAR COLLABORATIVE STRATEGY TO MAKE, SHAPE AND IMPLEMENT BEST IN CLASS

We propose that, if Edinburgh wishes to systematise waste collection in the New Town World Heritage site, it should do so by developing a tailored strategy in conjunction with heritage experts and local residents, building from the following 8 points.

1. Five Year Moratorium on Terminating Gull-proof Bags

First, recognise that the current proposals are not appropriate for the New Town. It would be wrong to implement a permanent solution that damages the streetscape for so little perceived benefit. Edinburgh should not have to be ashamed of the visual scar produced by its waste management. We already have a system that has been very carefully designed to meet the needs of residents and have minimal impact, and has been copied by other Heritage cities.



Waste generation policies are changing fast, with Deposit Return Schemes, and a greater focus on the responsibilities of manufacturers and suppliers. Systematised materials management and recycling will play a much greater part in future. Bulky visually intrusive bins are now being heavily pushed by the waste-management supply industry. But they will have a serious permanent, deleterious impact on the visual character of the New Town.

Edinburgh should be aiming to be at the forefront of new technologies for waste management, not tied into a costly and damaging system for the New Town, which will be out of date before it is installed.

Other Heritage Cities are innovating novel systematised, design-led approaches from which we can learn. A pause will enable Edinburgh to harness collective energy to design and deliver a scheme which both conserves the streetscape and ensures people friendly recycling / waste management.

NEW TOWN STREET ASSOCIATIONS**2. Improve the current system of Gull-proof bags and Recycling Boxes**

The current system has not been reviewed in response to changing waste patterns. General household waste has reduced and red box recycling waste has grown. For most households cardboard and plastic recycling represents their biggest waste category, yet it is collected infrequently and if a pick up is missed it is a total 4-week wait for the next - which is beyond the storage capacity of many homes.



Basically, the system does not have capacity for the recent increased volume of cardboard and plastic recycling. In contrast blue box collection for glass is underutilized and could be have more infrequent collections.

Litter can also be a problem particularly on windy days as few of the boxes have lids. The re-design of boxes and/or the availability of lids could also greatly reduce these problems associated with the current service provided. Council Officials have also expressed unhappiness that some residents on gull-proof bag streets are using nearby communal bins. This also appears higher on streets with a large number of short-term let properties. There are a number of ways in which this could be addressed, if required.

Short-term low cost improvements to the gull-proof bag and box system would buy time to properly devise and implement a new strategy.

It should also be accepted that for some locations and for some residents it could be the most appropriate long-term solution.



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3. Collaborate and innovate, communicate with local residents and build buy in on recycling and waste collection improvements

There is considerable evidence that actively encouraging residents to properly sort and clean waste is the most important factor in achieving high rates of recyclable rubbish. Imposing a visually damaging system against local opposition is likely to undermine the objectives of the scheme. Working collaboratively to create a strategy is the best way of solving the problem of achieving good recycling rates in a heritage city. A variety of methods could be done to achieve this, including inclusive steering arrangements, citizen's jury, design-led competition etc.

There is also a more immediate communication need. The New Town population is mobile with a substantial student population, short-term lets and a routine turnover of new residents. The purpose of the Gull-proof bag and box system is poorly understood by incoming residents. Very few residents understand that the communal bins adjacent to the Gull-proof bag streets are only intended for the use of that street and not to be used by people living in Gull-proof bag streets. There have been only one or two attempts to reach out to residents over the last decade about this and no sustained communications. This falls well short of what could be done.

There is an immediate need to educate residents and small businesses on the correct use of the current system to increase participation and recycling rates. This could include reviewing use of Gull-proof bags on those streets with continuing low levels of use.

A positive campaign implemented in such a way that it informs new residents would build support and understanding for the existing system and any agreed long-term changes.

4. Devise the strategy in response to the needs.

Understand the disparate population of the New Town and shape the strategy to meet their needs. For some people carrying sorted rubbish a distance is no problem but their lifestyle means that they may not be home in the morning to put out and take in containers for rubbish. Older or disabled residents may especially value the doorstep collection but would struggle to deposit rubbish in a communal container at some distance from their homes.

Where residents are walking to a Communal Bin rather than using a doorstep service, consideration could be given to increasing the frequency of such collections and building meeting those needs into the strategy. There is no obvious reason for penalising residents for this behaviour - particularly if the alternative is a bin in a more intrusive/damaging location.

According to the Council data problems of leakage into Communal bins are highest where short-term let occupancy rates are highest. Permanent residents should not be penalised for the behaviour of those in unlicensed rentals by taking away gull proof bag services. The planned

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licensing of short-term lets should provide an opportunity to establish Council waste policy for these businesses and ensure that their rubbish is dealt with in a way that does not cause an adverse impact on the streetscape.

Understand the reasons why the current communal bins do not work well in some locations and address these issues (e.g. AirBnB properties, use by commercial businesses, insufficient frequency of collections, fly-tipping). Identify potential changes to location and mix of communal bins within the New Town.

Adjust frequency of collection to better match need. Investigate packaging return options with delivery companies.

Most significantly take account of the need to minimise impact on the historic environment from the outset.

5. Address the Health and Safety issues identified by CEC from use of Gull-proof bags.

Concern about the health and safety of waste operatives has been cited as one of the main drivers of the Communal Bin Review. Evidence released by the Council under FOI shows that this problem is on the decline, aided by improvements in bag design. Two incidents took place in 2020 associated with Gull proof bags and recycling boxes. Nevertheless, there may be scope to improve matters further by removing any of the old style Gull-proof bags without Velcro.

Any consideration of the health and safety of waste management must include examination of the impact on all users, including residents carrying and lifting rubbish into large street containers.

6. Encourage and pilot mobile solutions to sorted waste collections

A moratorium is an opportunity to explore more innovative alternatives to the gull proof bag and box system. One solution is to provide mobile rubbish collecting devices that are put on the street for an advertised short period. This is done by electric vehicles, lorries or even, in Venice, barges. People bring their rubbish to the location at the time the vehicle or bin is there and put it into different slots appropriately. In time purpose-built mobile pods could perform this function. A five-year plan would allow Edinburgh to take advantage of radical solutions such as these, appropriate to the city's needs.

NEW TOWN STREET ASSOCIATIONS**7. Waste Rooms and Underground solutions**

Many cities around the world have created underground storage facilities for rubbish, some of very high design quality. Such a scheme has already been implemented in the Grassmarket. These are expensive but in the longer term could be part of a strategy for Edinburgh. More recently many heritage cities are implementing less expensive waste rooms / Ecopoints which keep the entire waste infrastructure completely out of sight- e.g. the World Heritage Site of Cordoba.

Cordoba World Heritage Site - From improving appearance to completely removing

- 51% Communal Bin capacity- with well-designed covers
- 4% Underground containers
- 23% Door to door collection
- 23% Waste rooms/Ecopoints

Ecopoints are seen as the most advanced solution- a public waste room in a building. The plan is to extend Ecopoints to the whole historical town centre (32,000 residents) removing all of the 51% capacity in communal bins in streets. So far Cordoba has removed 153 street bins. Each waste room serves about 770 inhabitants.

Compacting bins and the use of sensors would improve the management of waste collection facilities.

By working together designers, residents, heritage experts and waste managers could create innovative infrastructure solutions underground or in buildings which meet the needs of the city with minimal or no impact on the historic environment.

8. Work with the Community rather than against us

We are proud of and care deeply about the heritage in the New Town and are anxious to see it remain for future generations. We want to increase recycling and play our part in making that happen. There is time to pause now and see if we can rise to this challenge by working together. If we work together, Edinburgh can become a leader in waste management in World Heritage sites. Imposing large numbers of ugly bulk containers on sensitive streetscapes is the wrong way forward. As can be seen in Annex B, historic cities around the world are already showing that there is an alternative.

Surely Edinburgh can match and surpass them?

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Annex A

IMPACT ASSESSMENT: EXISTING WASTE MANAGEMENT AND COMMUNAL BIN HUBS

	Gull-proof bags and recycling boxes	Communal Bin Hubs
Impact on Streetscape	Bags and boxes on street for a temporary period. Little or no impact	Permanent presence on the street of large numbers of ugly bin hubs. Minimal mitigation (colour and railings) proposed by ECC.
Impact on amenity	Little or no impact. Temporary presence of recycling boxes on pavements could be reduced by training operatives.	Vermin and graffiti problems. Fly tipping problems.
Cost	Gull-proof bags £80k per year Red box recycling £40k per year (Source ECC FOI)	No costs provided by ECC. Expected to be neutral overall. Substantial funding is being sought from Zero Waste Scotland.
Health and safety	Small number of incidents per year 2 incidents from GP bags and recycling boxes in 2020 Source ECC FOI	Not assessed. Much of the risk transferred to residents who will have to carry rubbish and insert into large bins
Impact on recyclable waste collection	High quality sorted waste. Sorted rubbish in red boxes exceeds capacity	Likely to be problems of contamination of recyclables

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Annex B

Historic Cities & Their Waste Strategies

There is much we can learn from cities with similar challenges. World Heritage sites and Heritage cities across Europe have been working together to share good practice and solve problems. Intherwaste Europe, [*Collection of Good Practices for Waste Management in Urban Heritage sites 2019*](#)

The City of **Amsterdam** has up to 15,000 underground containers in total for rubbish but most of the waste in the historic centre and World Heritage Site is still collected by twice weekly pick-up of bagged waste from the pavements (either from 6am or 5pm). Because their experience is waste is not separated properly, from early 2022 plastics and drink containers will no longer be separated from general rubbish throughout the city. Large orange containers are being removed, and plastics will be separated from general rubbish in future by machine.

Bath followed Edinburgh and introduced gull-proof bags to collect waste throughout its World Heritage site.

Bergen (including the World Heritage Site of Bryggen) in 2008 Bergen made the bold decision to move all waste collection underground and remove all waste bins and containers from its historic centre covering 12,000 households and 7sq km. The underground waste system was constructed together with other new infrastructure - district heating, rehabilitation of waste water and cable. Customers (private, business and passers-by) use chip and pin to access waste inlets. The waste moves through underground pipes by vacuum to collection stations. The system works for household waste, paper, plastic and cardboard at the moment and is being enhanced to deal with glass, metal and bulky waste. Commercial and domestic waste can be mixed because of the ID tracking.

Cordoba World Heritage Site has been working on reducing the visual impact of waste collection infrastructure for decades. In 1995 they installed the first designed container housings near the Mosque and in 2003 initiated some underground provision and container housings throughout the old town. The current strategy is to replace all communal street bins with waste rooms or Ecopoints. These may be accessed from outside or inside for waste disposal but the containers are never visible. The rooms are insulated acoustically and thermally, and many have automatic sensors to detect the fullness of the bins.

Ibiza and Porto are also developing waste rooms in their historic centres.

Mallorca has introduced mobile bins for aesthetic and topographic reasons in the historic city centre. The bins are transported by electric vehicle and placed for just a few hours at a time. The waste disposal company can adjust the amount and types of container placed at the spot each time to meet demand.

Venice - in 2016 Venice introduced a new system of waste collection to minimise impact on the historic environment and limit problems with gulls and rats. The solution is that people who are up early can deposit rubbish between 6 and 8.30 am in barges with compacters, which are

NEW TOWN STREET ASSOCIATIONS

removed the rest of the time. General waste is received every day, with recyclables on alternate days. Rubbish is also collected door to door, for the convenience of residents and tourists but the refuse collector rings the doorbell so that no rubbish is left in the street. Information about waste collection is widely publicised and made available in 19 languages and through Apps. Tourists are warned that if they do not follow the rules they and their landlord can be fined - and the landlord may pass on the charge to them.

Florence - Florence chose to eliminate waste bins in the historic centre and replace with underground waste facilities. In total 672 waste bins were eliminated between **2008 and 2016**, replacing them with 45 underground stations. The underground facilities are monitored, cleaned and washed every day. The project is seen as a significant contribution to the maintenance of the architectural and historical qualities of the World Heritage Site.

Before and after images in Florence REMOVING the solution proposed for New Town Edinburgh





Adam McVey
Leader of City of Edinburgh Council

Sent by email; adam.mcvey@edinburgh.gov.uk

25th January 2022

Dear Adam,

Thank you very much for your time last Friday to discuss our very serious concerns about Edinburgh Council's decision to impose Communal Bin Hubs across Edinburgh's New Town – a World Heritage site.

As you know, while there were only five of us at the meeting, evidence points to the vast majority of New Town residents agreeing with our position.

I thought it might be helpful to recap on our discussion.

The decision taken by seven members of the Transport and Environment Committee on 22 April 2021 to replace Gull-proof bags and recycling boxes with 7 metre Communal Bin Hubs every 100 metres across the World heritage Site has proved to be extremely controversial. The decision was taken without any engagement, consultation or discussion with residents, resident associations and heritage organisations. No impact assessments of any kind have been commissioned. As we explained, our own survey, a recent one conducted on India Street as well as Angus Robertson's office all show that an overwhelming majority of residents in the area affected by this decision (up to 90%) object to the Council's decision. This is only reinforced by the Council's own information on the views expressed at the 'Information Events' held over the past few months (obtained through a freedom of information request).

Residents in the New Town are as passionate as CEC about developing a clean environment: with less pollution; greater levels of recycling; and greener transport. However, this must be achieved in a way that at least protects the streetscape. The two are not mutually exclusive. We strongly disagree with your view that Communal Bins Hubs are analogous to parked cars in terms of their overall impact on the streetscape. Evidence across the City shows that these bins: invite graffiti, attract vermin, are smelly and encourage fly tipping. They also stop people taking personal responsibility for their own recycling – as recycling bins can often be found filled with landfill waste. There is a great risk that sequential decisions made by the Council have the effect of salami-slicing away at its World Heritage status.

We remain extremely concerned that the Council does not appear to be taking appropriate responsibility for Edinburgh World Heritage site and conservation area. The Council committed to this duty of care when you personally, on behalf of the Council, signed the current five-year management plan in 2017. We are disturbed by your view that the Council's current approach of 'one size fits all' must be maintained irrespective of residents' and others' views, and irrespective of the obligation world heritage status brings – that a more considered approach is required.

As we explained, we have found the engagement with, and decision-making process of, the Council to be completely undemocratic and untransparent. It appears as if the Council take the 'we know best' approach to these matters, ignore the views of those it is serving and is determined - come what may - to implement its decision. As you will certainly be aware, next Thursday's Transport and Environment Committee will consider a Business Bulletin that confirms that despite the views expressed by the heritage bodies charged with protecting the status of the World Heritage Site that the Council is intent on implementing a common approach to waste collection across the New Town. The only conclusion is that the Council has no wish to engage with the community it serves or carry its support.

You appeared to be unaware of the Edinburgh World Heritage and Historic Environment Scotland's public position on the imposition of these Communal Bin Hubs. So it might be helpful for me to outline them here for you.

EWH's website:

It is worth stating that any major decisions concerning changes to services in local areas should be taken with the consent of the community. While this may not be a statutory obligation in the case of waste disposal, we believe that moving forward without the support of local people and community groups would set an unfortunate precedent for the future.

...we are concerned that the current plan to locate numerous new bin hubs across the New Town represents a threat to the visual integrity of the New Town. Adding street clutter will negatively alter the character of our Georgian terraces. An Environmental Impact Assessment is being considered, which we believe is required.

HES has stated (to the Council):

It is our view that the proposed roll-out of bin hubs throughout the World Heritage Site has the potential to have a significant impact, particularly within the carefully planned and consistent classical streets within the New Town.

A one-size-fits-all strategy for the wider city which includes the World Heritage Site will mean that a series of bin hubs will be sited on streets currently without any visible waste collection.

The introduction of standard designed bin hubs in these streets will have a negative visual impact on this part of the World Heritage Site and we would welcome an alternative approach.

The streets that currently have Gull-proof bags and recycling boxes represent less than one percent of households affected by this decision and about the same percentage of the waste collection budget. The greatest gains in terms of recycling are not in the area with gull proof bags - best value can be achieved by focussing on those areas with on-street bins.

Taking the above into account and the strong opposition to the decision, we would urge the Council to:

- **Pause - and consider other alternatives;**
- **Seriously examine and adopt national and international best practice in this area; and**
- **Work with and not against the communities you represent**

Kind regards,

Carol Nimmo

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