



EXECUTIVE

**TUESDAY
8 APRIL 2025
GIPPING ROOM, GRAFTON HOUSE
6.00 PM**

COUNCILLORS

LABOUR

**Neil MacDonald
Bryony Rudkin
John Cook
Martin Cook
Carole Jones
Jane Riley
Alasdair Ross
Philip Smart
Lucy Trenchard**

PORTFOLIO

**Leader of the Council: Place
Deputy Leader: Strategy & Transformation
Communities & Sport
Resources
Planning & Museums
Culture & Customers
Housing
Environment & Transport
Parks & Climate Change**

CONSERVATIVE

Ian Fisher

A G E N D A

	PART 1
1.	Apologies for Absence
2.	<p>Unconfirmed Minutes of Previous Meeting (Pages 5 - 6)</p> <p>To consider the Minutes of the meeting held on 19 March 2025.</p>
3.	To Confirm or Vary the Order of Business
4.	Declarations of Interest
5.	<p>E/24/56 Simpler Recycling - Mixed Recycling and Residual Waste Options (Pages 7 - 40)</p> <p>Portfolio Holder – Councillor Philip Smart</p> <p>Government has legislated for Councils to align their waste and recycling services with new nationwide Simpler Recycling requirements by 31st March 2026. The Council already meets many of the requirements, but it will need to either provide new services or alter existing services to collect:</p> <ul style="list-style-type: none"> • food waste (weekly) • glass bottles and jars • cartons • plastic film (by April 2027) <p>Executive is asked to consider the contents of this report and decide on the mixed recycling model that is to be implemented in Ipswich as well as the frequency of residual waste collection.</p> <p>If the chosen model is Twin Stream, then Executive is asked to recommend to Council the approval of an additional £1.8m to be added in the Capital Programme for 2025/26 to make provision for the procurement of the additional bins required. Authorisation is also sought for the procurement activity necessary to implement a mixed recycling collection service by 31st March 2026 through an outsourced specialist delivery distribution company for bin delivery if the in-house option is not feasible or practicable.</p>
6.	<p>E/24/57 Scrutiny Task & Finish Group - Town Centre Cleanliness (Pages 41 - 52)</p> <p>Portfolio Holder – Councillor Philip Smart</p> <p>This report sets out the recommendations made by the Strategic Overview and Scrutiny Committee through its Town Centre Cleanliness Task and Finish Group.</p>

7.	<p>E/24/58 Response to Government Consultation on Norfolk and Suffolk Devolution (Pages 53 - 62)</p> <p>Portfolio Holder – Councillor Neil MacDonald</p> <p>The Government began a consultation on establishing a Mayoral Combined County Authority across Norfolk and Suffolk on 17th February 2025. The deadline for consultation responses is 13th April 2025.</p> <p>This report provides a draft consultation response for Executive to consider prior to sign off and authorises the Chief Executive in consultation with the Leader of the Council to finalise and submit the response.</p>
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Shirley Jarlett

**SHIRLEY JARLETT
MONITORING OFFICER**

31 March 2025

Any enquiries about this meeting should be addressed to
Ainsley Gilbert - 01473 432510 / ainsley.gilbert@ipswich.gov.uk
Grafton House, 15 - 17 Russell Road, Ipswich IP1 2DE.
Website: www.ipswich.gov.uk



The information contained within these papers can be made available in alternative formats. Please use the contact details above for assistance

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EXECUTIVE MINUTES

**WEDNESDAY 19 MARCH 2025
GALLERY 2, TOWN HALL
7.10 PM**

Present: Neil MacDonald (Leader), Bryony Rudkin (Deputy Leader), John Cook, Martin Cook, Carole Jones, Jane Riley, Alasdair Ross, Philip Smart, Lucy Trenchard and Ian Fisher

111. Apologies for Absence

There were no Apologies for Absence.

112. Unconfirmed Minutes of Previous Meeting

It was RESOLVED:

that the Minutes of the meeting held on 11 March 2025 be signed as a true record.

113. To Confirm or Vary the Order of Business

It was RESOLVED:

that the Order of Business be confirmed as printed on the Agenda.

114. Declarations of Interest

There were no Declarations of Interest.

115. E/24/55 Proposals for Local Government Reorganisation in Suffolk

115.1. Councillor MacDonald noted that an addendum had been circulated. Councillor MacDonald introduced the report, noting that this was a once in a generation opportunity to reshape Local Government in Suffolk and thereby improve the lives of residents.

It was RESOLVED:

- a) that Executive notes the views of Council, as expressed at its meeting on 19th March 2025.**
- b) that Executive notes the content of the draft Interim Plan attached at Appendix 2 of the report and the Case for a unitary Ipswich Council at Appendix 1 of the report.**
- c) that Executive authorises the Chief Executive, in consultation with the Leader of the Council, to finalise the submission of an Interim Plan to Government for its 21st March 2025 deadline.**
- d) that Executive certifies the decision at c) as urgent and exempt from call-in.**

Reason: to comply with the Government's requirement to receive an Interim Plan for Local Government Reorganisation by 21st March 2025.

116. Exclusion of Public

It was RESOLVED:

that the public (including the Press) be excluded from the meeting during consideration of the following items under Regulation 21 of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2000 as it was likely that if members of the public were present during these items there would be disclosure to them of exempt information falling within paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 (as amended).

117. Unconfirmed Exempt Minutes of Previous Meeting

It was RESOLVED:

that the exempt Minutes of the meeting held on 11 March 2025 be signed as a true record.

The meeting closed at 7.15 pm

Chair

5

COMMITTEE: EXECUTIVE **REF NO:** E/24/56
DATE: 8 APRIL 2025
SUBJECT: SIMPLER RECYCLING – MIXED
 RECYCLING AND RESIDUAL
 WASTE OPTIONS
PORTFOLIO HOLDER: COUNCILLOR PHILIP SMART
SENIOR OFFICER: HANNAH LEYS

Short description of report content and the decision requested:

Government has legislated for Councils to align their waste and recycling services with new nationwide Simpler Recycling requirements by 31st March 2026. The Council already meets many of the requirements, but it will need to either provide new services or alter existing services to collect:

- food waste (weekly)
- glass bottles and jars
- cartons
- plastic film (by April 2027)

Executive is asked to consider the contents of this report and decide on the mixed recycling model that is to be implemented in Ipswich as well as the frequency of residual waste collection.

If the chosen model is Twin Stream, then Executive is asked to recommend to Council the approval of an additional £1.8m to be added in the Capital Programme for 2025/26 to make provision for the procurement of the additional bins required. Authorisation is also sought for the procurement activity necessary to implement a mixed recycling collection service by 31st March 2026 through an outsourced specialist delivery distribution company for bin delivery if the in-house option is not feasible or practicable.

Ward(s) affected:

All wards

List of Appendices included in this report:

Appendix 1 – Equality Impact Assessment

This report has been prepared by Chris Taylor – Head of Service for Waste and Fleet, Tel: 01473 432481, Email: chris.taylor@ipswich.gov.uk

This report was prepared after consultation with:

Internal consultees:

Corporate Management Team

Portfolio Holder for Environment and Transport

External consultees:

Suffolk Waste Partnership

Eunomia

The following policies form a context to this report:

(all relevant policies must also be referred to in the body of the report)

Corporate Strategy – Proud of Ipswich: Championing our Community and

Revitalising our Town

LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW

(papers relied on to write the report but which are not published and do not contain exempt information)

1. **Executive Paper Ref: E/23/44 Simpler Recycling (Food Waste)**
<https://democracy.ipswich.gov.uk/mgAi.aspx?ID=21373>

OTHER HELPFUL PAPERS

(papers which the report author considers might be helpful – this might include published material)

1. **The Environment Act 2021** **[Environment Act 2021 \(legislation.gov.uk\)](#)**
2. **[Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](#)**
3. **[25 Year Environment Plan: progress reports - GOV.UK \(www.gov.uk\)](#)**
4. **Government response to the Consultation on requirements within The Environment Act 2021 - [Government response - GOV.UK \(www.gov.uk\)](#)**
5. **Simpler Recycling in England: policy update - [Simpler Recycling in England: policy update - GOV.UK](#)**

1. Executive Summary

- 1.1 Government has legislated for Councils to align their waste and recycling services with the new nationwide Simpler Recycling requirements by 31st March 2026. The Council already meets many of the requirements, but will need to either provide new services or alter existing services to collect:
- food waste (weekly)
 - glass bottles and jars
 - cartons
 - plastic film (by April 2027)
- 1.2 In the Executive Paper of 6 February 2024 Simpler Recycling – Food Waste Collections (Ref No: E/23/44), decisions were made on the implementation of a food collection service and it was reported that further guidance would be issued by Government on the requirements for the collection of dry recycling products and clarification on the new funding mechanisms for this. Decisions would then be required on meeting the new requirements for the additional dry recycling materials.
- 1.3 This report focuses on a decision which is now needed on the mixed recycling model that is to be implemented in Ipswich and as the frequency of residual waste collection will have an impact on the collection of mixed recycling, a decision is also required on the frequency of residual waste collection.
- 1.4 The preferred recycling collection options have been developed by the Suffolk Waste Partnership members and the final choices will need to consider the benefits that a common collection method gives to contractual arrangements and communications campaigns.
- 1.5 Significant changes will be needed to the Materials Recovery Facility (MRF) contract operated by Suffolk County Council for all District and Borough Councils in Suffolk. Approval of the recommendations will allow them to proceed with negotiations to vary the contract and time for the contractor to make the required changes to meet the March 2026 deadline.
- 1.6 Due to concerns over the capacity of the supply chain to meet unprecedented nationwide demand for bins, Executive is asked to consider the contents of this report and the recommendation to proceed with the procurement activity necessary to implement a compliant mixed recycling collection service by 31st March 2026.

2. Background

Simpler Recycling

- 2.1 The Environment Act 2021, in particular the element of Simpler Recycling, aims to develop the UK's circular economy, increasing the lifespan of products and packaging and reducing the demand for virgin materials. It also sets targets to increase the UK's municipal recycling rate to 65% by 2035. This is vital to address the UK's plateauing recycling rates.
- 2.2 The Environment Act 2021's Simpler Recycling legislation requires businesses to separate recyclable materials from non-recyclable waste. This will impact businesses, households, waste collection authorities and suppliers by introducing a more standardised collection system across England.
- 2.3 Ipswich Borough Council has stated its commitment to Simpler Recycling (previously known as Consistency in Recycling Collections) and already meet many of its requirements via Suffolk County Council's disposal and recycling system. However, the Council will need to either provide new services or alter existing services to collect glass bottles and jars, cartons, food waste (all by April 2026) and plastic film (by April 2027).
- 2.4 In addition to Simpler Recycling, the Act also enables Extended Producer Responsibility (pEPR). pEPR ensures that producers of packaging waste are responsible for covering the costs associated with its collection, recycling and/or disposal of the packaging that they place on the market. Government is currently in the process of setting up PackUk as Scheme Administrator to oversee pEPR, with fees being collected from packaging manufacturers in October 2025. PackUk will be responsible for setting the pEPR fees, collecting the fees from obligated producers and issuing packaging waste disposal payments to local authorities.
- 2.5 This means that Local Authorities will in future receive payments for the household packaging waste they collect and send for reprocessing. This will include packaging collected as part of a kerbside recycling scheme, packaging present in residual waste (the refuse bin) and packaging collected in litter bins.

New Government Guidance

- 2.6 On 29th November 2024 DEFRA wrote to all Chief Executives and published an update on Simpler Recycling, which set out the new default requirements for premises in scope of Simpler Recycling includes containers for:
 - residual (non-recyclable) waste

- food waste (mixed with garden waste for households, if appropriate)
- paper and card
- all other dry recyclable materials (plastic, metal and glass)

These may be various container types, including bags, bins or stackable boxes.

Mixed Recycling

2.7 Additional detail was included:

- By default, paper and card should be separately collected from all other dry materials so their potential to be recycled is not reduced.
- All other dry materials may be co-collected, as the benefit of simplifying (and thereby potential to increase volumes), offsets the smaller contamination risk.

2.8 Although the default requirement is set out above, DEFRA have also confirmed that local flexibility to co-collect paper and card with other dry materials remains where separate collection is technically or economically impracticable or provides no significant environmental benefit. For example, this may be more appropriate for high-rise flats or houses with very limited outside space.

2.9 Waste collectors will need to produce a short written TEEP assessment explaining their decision, which needs to be based on it:

- is not 'technically practicable'
- is not 'economically practicable'
- has 'no significant environmental benefit'

Residual Waste

2.10 On 29th November 2024 the Government published new guidance ensuring good waste collection services for households - [Ensuring good waste collection services for households - GOV.UK](#)

2.11 This states:

“As is currently the case, waste collection authorities should continue to decide collection frequency and methodology for collecting the residual (non-recyclable waste) and dry recyclable waste streams, and do so in a way that meets local needs and provides value for money for the taxpayer.

When waste collection authorities are planning and delivering waste collection services from households, they should make sure that:

- all households have reasonable residual and recyclable waste collections

- they consider providing additional services for specific needs, such as households with medical needs
- there is no build-up of odorous waste at the kerbside
- changes to collections do not lead to an increase in fly-tipping of residual waste”

2.12 Therefore, the option to collect residual waste less frequently remains available.

Analysis of Service Models

2.13 In 2022 the Suffolk Waste Partnership (SWP) commissioned an analysis of potential Environment Act compliant collection service models. This analysis was undertaken by Eunomia, a well-established specialist waste sector consultancy.

2.14 The analysis focussed on ‘standard’ service provision for the majority of properties. It is recognised that some properties, e.g., flats and houses of multiple occupancy (HMOs) will require a more tailored or ‘non-standard’ service.

2.15 The analysis looked at 11 possible collection service options based on 3 main recycling methodologies:

Mixing / Co-Mingling/ Co-Collection - collecting the new full range of recyclable materials in one recycling bin, for subsequent sorting.

Twin Stream – paper and card would be collected in one recycling bin, and glass, plastics and cans in a separate recycling bin to reduce sorting and preserve material quality.

Kerbside sort – under this model, all in scope recyclable materials, including food, would be separated into at least three different containers by the householder and collected in separate chambers on a single, specialist collection vehicle weekly.

2.16 Separate food waste collections and enhanced recycling will significantly reduce the quantity and odorous content of residual waste. The Eunomia analysis therefore also considered each recycling service alongside either a 2 weekly (as is current) or 3 weekly collection of residual waste.

2.17 The ‘kerbside sort’ recycling options use most vehicles and staff, so are the most expensive, and rely heavily on higher secondary material income to offset costs – income reliance is a major risk. These options also require the most bins/boxes per property. The ‘kerbside sort’ options were not progressed.

2.18 The 11 collection service options were evaluated against the range of weighted criteria as below:

- a. Additional Cost
- b. Change to Recycling Rate
- c. Carbon Impact
- d. Flexibility
- e. Jobs Created
- f. Social Value
- g. Public and Political Acceptability
- h. Ease of Implementation
- i. Compliance With Legislation

Twin Stream

- 2.19 Twin Stream recycling collections keep paper and cardboard packaging separate from glass, bottles, cans, cartons etc.
- 2.20 Usually this requires 2 recycling bins, so an additional bin is provided to each property. Although the service could be provided through the provision of a box or sack, this would mean there is a significantly higher risk of litter occurring from loose material and will also require alternative refuse collection vehicle bodies to those currently being used so that a lower loading height is provided on the rear of the vehicle.
- 2.21 The analysis concluded that certain Twin Stream options provided the best overall future service models. These were:

Option 3 – Twin Stream alternating recycling collections and **fortnightly** refuse.

Option 7 – Twin Stream alternating recycling collection and **3-weekly** refuse.

Option 11 – Linear recycling collections (recycling collected 2 weeks out of 3) and 3-weekly refuse.

- 2.22 A visual explanation for the Option 3 Twin Stream collection model is identified below (Garden waste will become a subscription only service from 1st April 2025):

Collection Calendar	Week 1	Week 2	Week 3	Week 4
Refuse		✓		✓
Recycling 1	✓			
Recycling 2			✓	
Food	✓	✓	✓	✓
Garden (Subscription only)	✓		✓	

- 2.23 Twin Stream has lower projected costs for processing of the material collected, as a result of there being less processing needed to separate the materials mixed in the bin by the resident and then compacted together in the same refuse collection vehicle.

- 2.24 It is also likely that the recovered paper and cardboard will be a better quality commodity and can be sold at a higher value than in a Co-mingled/ Co-collection service as the contamination from glass, residual food etc is negligible.
- 2.25 Twin Stream is now the Government default requirement.
- 2.26 There will be a significant number of properties where a Twin Stream service will present challenges and a different approach including alternative collection containers or frequencies may need to be considered, especially:
- Urban terraced homes with little or no external space
 - Flats
 - Houses of multiple occupancy (HMOs)
 - Hard to access properties
- 2.27 The current property type in Ipswich is:
- Detached – 14%
 - Semi Detached – 38%
 - Terraced – 22%
 - Flats/ HMO etc – 25%
- 2.28 There would be a circa £0.23million per annum additional cost to the Council associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins.
- 2.29 The Council would need to arrange delivery of additional bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed in-house by the Council.

Co-collection/ Co-mingled

- 2.30 The Co-Collection/ Co-mingled option means that only 1 x recycling bin is needed at each property. Glass, paper/card, plastic bottles, cartons etc are all placed in one bin.
- 2.31 The collection frequency would be fortnightly.
- 2.32 The Co-mingled recycling options are expected to cost circa £2million per annum more to the Suffolk system than the Twin Stream options due to:

- a) The processing of the mixed material at a Material Recycling Facility to separate the material through both automated processes and manual picking lines.
 - b) The lower commodity value of paper and card which may be contaminated with glass shards and food.
- 2.33 There would be a circa £0.1million per annum additional cost to the Council when compared to current costs, due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF.
- 2.34 A visual explanation for the Co-mingled collection model is identified below (Garden waste will become a subscription only service from 1st April 2025):

Collection Calendar	Week 1	Week 2	Week 3	Week 4
Refuse		✓		✓
Recycling 1	✓		✓	
Food	✓	✓	✓	✓
Garden (Subscription only)	✓		✓	

Processing of Mixed Recycling

- 2.35 Suffolk's recyclable materials are currently sorted under a Suffolk County Council (SCC) managed contract at a Materials Recycling Facility (MRF) in Great Blakenham. This contract was let in 2019 and runs until May 2029.
- 2.36 It would not be financially viable for the MRF facility to process both a Twin Stream and a Co-mingled product as the sorting lines will become inefficient.
- 2.37 As the intention is for Babergh/Mid-Suffolk, East Suffolk, West Suffolk to collect a Twin Stream material, it is the County Council's intention that the MRF is reconfigured to:
- a) Accept both a Co-mingled material and a Twin Stream material within separate bays in the facility tipping hall.
 - b) Process only the 'containers' stream from the Twin Stream material.
 - c) Load the 'paper & card' stream from the Twin Stream material onto bulk haulage to be processed at an alternative facility.
 - d) Load the 'Co-mingled/ Co-collected' stream onto bulk haulage to be processed at an alternative facility.

- 2.38 The MRF operator estimates that it will take 12–18 months to make the necessary infrastructure changes to the facility.
- 2.39 The configuration of the MRF (a) and bulk haulage arrangements (d) as detailed in 2.37 above will not be required if the Council's decision is to proceed with Twin Stream.

Refuse/ Residual Waste

- 2.40 Simpler Recycling is expected to significantly reduce the quantity of material residents dispose of in their refuse bins. In particular:
- Food Waste – accounts for approximately 35% of the household refuse bin contents, and a significant proportion of odorous waste. This will be captured by the new weekly food waste service.
 - Glass and cartons – accounts for approximately 6% of household refuse bin contents. This will be captured by either the Twin Stream or Co-mingled service.
 - Plastic films – account for approximately 6% of household refuse bin contents. This will be captured by either the Twin Stream or Co-mingled service.
- 2.41 An increasing number of councils that have introduced enhanced recycling and food collections have also reduced the frequency of their refuse collections, delivering cost and carbon savings.
- 2.42 Evidence from these areas suggests that reducing refuse capacity alongside increased recycling capacity encourages greater adoption of recycling behaviours, resulting in improved capture of food and recyclable materials. An analysis on national averages demonstrates that average recycling performance could increase from c.38% to c.54% with improved recycling and food collections alongside 2-weekly refuse collection, but to c.59% alongside 3-weekly refuse collection.
- 2.43 The option to collect residual waste less frequently remains available.

Funding for Mixed Recycling

- 2.44 Simpler Recycling aims to significantly improve recycling services as well as introduce nationwide consistency. Government has committed that the full cost of the collection and processing of mixed recycling additional requirements will be funded through packaging Extended Producer Responsibility (pEPR) payments from packaging producers.
- 2.45 From 2025, some organisations and businesses will have to pay a fee for the packaging they supply to or import into the UK market. The money will go to local authorities (LAs), as:
- waste disposal, waste collection or unitary authorities

- statutory waste disposal authorities
- 2.46 It will cover net costs of collecting, managing, recycling and disposing of household packaging waste. In the first year (April 2025 to March 2026) LAs will receive a basic payment based on: - publicly available and existing data, including WasteDataFlow information and Office of National Statistics (ONS) data - data about tonnages, operations and unit costs gathered from a representative sample of LAs across the UK.
- 2.47 A model (the Local Authority Packaging Cost and Performance model or LAPCAP) developed by DEFRA on behalf of the four nations has been used to determine the estimated net efficient costs incurred by every local authority (LA) in the UK for the management of household packaging waste.
- 2.48 In line with the draft Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations and where relevant to each authority, LAPCAP consider the following factors in determining the estimated net efficient costs:
1. The frequency, pattern and type of collections of household packaging waste undertaken within each LA
 2. The population density in each relevant area
 3. The type and accessibility of dwellings in each relevant area
 4. The levels of deprivation in each relevant area
 5. Government policies and the regulatory requirements affecting waste management to which your authority is subject
- 2.49 The estimated total pEPR payment for the Council for the 2025/26 financial year is £1.573million. SCC has also had its own estimate of payment related to its costs.
- 2.50 Whilst the pEPR payment may still change, in order to provide certainty to authorities, the UK government is guaranteeing that in 2025/26 the Council will receive at least the amount displayed above. Payments in future years may be linked to the collection model, recycling performance and/or costs.
- 2.51 The current cost for operating the Mixed Recycling service is circa £1.3million per annum. There would be a circa £0.1million per annum additional cost to the Council for a Co-mingled option due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF. There would be a circa £0.23million per annum additional cost to the Council associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins. These costs will be covered by the pEPR payment.

- 2.52 Whichever options are chosen the changes required for implementing Simpler Recycling will require a clear, easy to understand communications campaign with Ipswich residents.

3. Relevant Policies

- 3.1 The Government has set a clear legal requirement for councils to introduce the required changes through Simpler Recycling part of the Resources and Waste Strategy for England.
- 3.2 Corporate Strategy – Proud of Ipswich: A financially sustainable council providing good quality services. The Council has a responsibility to provide high quality services. We know that the services we provide make individuals' lives better and help the town to thrive.

4. Options Considered/Under Consideration

Options

- 4.1 There are two decisions which need to be made:

Decision 1 – Which model for Mixed Recycling?

Decision 2 – Is there to be a change to the frequency of Residual waste collections?

- 4.2 The options can be described as:

Co-mingled mixed recycling collections
Twin-Stream mixed recycling collections

Three-weekly refuse collections
Fortnightly refuse collections

Decision 1 - Mixed Recycling

Option - Co-mingled/ Co-collected Mixed Recycling

- 4.3 The Co-mingled mixed recycling model is the one currently in place in Ipswich.
- 4.4 The Co-mingled option is not the better option for the environment in terms of emissions, as the material would not be processed at the Great Blakenham MRF and would be bulk hauled to North London for processing. There is more likelihood of paper and card being rejected during the processing due to contamination from glass.
- 4.5 The Co-mingled option will be more costly to the 'Suffolk System' as there will be additional costs associated with the transport and processing of this material to a processing facility in North London.

Additionally, the paper and card product recovered is likely to result in a lower resale value than that recovered from a Twin Stream.

- 4.6 It would be difficult to demonstrate through a TEEP assessment that this is the preferred model. A TEEP assessment requires the Council to demonstrate that the Government default model of Twin Stream collection is not 'technically practicable', or not 'economically practicable', or has 'no significant environmental benefit'.
- 4.7 This option is not recommended as the model is the least "efficient and effective" in terms of gaining the most benefit from the Co-mingled recycling material. This may result in lower pEPR payments as it is not the Government's default model. Adoption of this model would decrease the environmental benefits of the changes, would be less cost effective and would require a detailed technical and environmental analysis to be considered. It is unlikely the Council would be able to gain approval.

Option - Twin Stream Mixed Recycling

- 4.8 The Twin Stream option would be considered the best option for the environment in terms of emissions, as although it will require an additional bin to be provided, there is less processing required at the MRF and there is less likelihood of paper and card being rejected during the processing due to contamination.
- 4.9 The Twin Stream option will be less costly to the 'Suffolk System' as the material can be processed along with the other Suffolk material and a less contaminated paper and card product is likely to result in a higher resale value.
- 4.10 The Twin Stream option can be designed to be a better fit with neighbouring authorities meaning there would be less potential for a need for change if there are boundary changes as a result of Local Government Reorganisation.
- 4.11 The Twin Stream option will require each property to have an additional 240l bin for recycling.
 - a) This may present challenges to some residents in finding storage space for an additional 240l bin on top of the current recycling bin and the food waste and residual waste bins.
 - b) There are a significant number of properties where the bins remain on the public highway between scheduled collections and an extra mixed recycling bin will add to the 'bin congestion' that already exists.
 - c) The number of bins remaining on the public highway is expected to reduce from the return of Garden Waste bins from those residents who have chosen not to subscribe to the chargeable scheme from 01 April 2025.

- 4.12 It is likely that a number of properties; some flats and HMOs may need to have sack collections for the paper/card stream due to space limitations or may need to have a Co-mingled/Co-collection model.
- 4.13 This is the recommended option as it meets the Government default requirement, this option also has lower projected costs for processing of material and is likely to have a higher value commodity due to a better quality of paper and cardboard. This option has a favourable environmental impact and less emissions and will be a better fit with neighbouring authorities aiding communications and reducing the potential risk of additional change should any boundary changes occur as a result of Local Government Reorganisation.

Decision 2 - Refuse Collection Frequency

- 4.14 Government guidance published in November 2024 states that waste collection authorities should continue to decide collection frequency and methodology for collecting the residual (non-recyclable waste).
- 4.15 The Government guidance states that local authorities must monitor any changes to collection frequencies to ensure there are no unintended adverse consequences. Households receive “reasonable” residual waste collections, that there is no build-up of bad smelling waste at the kerbside, changes to collections do not lead to an increase in fly-tipping of residual waste.

Option - Three weekly Residual waste collections

- 4.16 This Option would maximise the opportunities to deliver the best outcomes from the service changes.
- 4.17 The weekly collection of food waste and introduction of additional materials that can be recycled will result in less material needing to be collected as residual waste, resulting in there being more capacity left in residents’ residual waste bin.
- 4.18 If residual waste collections were scheduled to be every 3 weeks rather than the current system of collecting every 2 weeks this would place more onus on compliant recycling and a push towards maximising recycling by residents.
- 4.19 As overall bin capacity per property would be increased through the removal of food waste and other mixed recycling items residents should have capacity in their residual waste bin to allow an extension of time between collections. Consideration would be needed for families with children in nappies and residents with certain medical conditions as this material may cause odour issues for residents if the material is not carefully wrapped to prevent odour release.
- 4.20 This option is not recommended at this time, as although separate food waste collections and enhanced recycling will significantly reduce the

quantity and odorous content of residual waste it is deemed that this would be a very contentious change for residents especially those who have the need to dispose of any type of nappy or similar waste and until a new system is up and running the real outcome on the volumes of waste and reduction in residual waste is relatively unknown

Option - Fortnightly Residual waste collections

- 4.21 The continuation of the fortnightly collection of residual waste will provide assurance to residents who may have concerns over their ability to manage a reduction in residual waste collections as a result of the expectation that the diversion of material into the other recycling streams will create additional capacity in the residual waste bin.
- 4.22 This is the recommended option for the collection of residual waste.

5. Consultations

- 5.1 In December 2018 Government published its Resources and Waste Strategy (RAWS).
- 5.2 Government subsequently consulted on various RAWS policies in 2019 and 2021, following which in November 2021 the Environment Act was passed, providing the legislative basis through which the strategic waste reforms will be enacted.
- 5.3 In October 2023 Government published its plans for Simpler Recycling with some further clarity on implementation and funding being released in the subsequent months.
- 5.4 In May 2024 the Government moved the Separation of Waste (England) (No.2) Regulations 2024 to an affirmative Statutory Instrument, subsequently confirmed by the Joint Committee on Statutory Instruments. This confirmed Twin Stream as the Government's preferred method of collection.
- 5.5 On 29th November 2024 DEFRA wrote to all Chief Executives and published an update on Simpler recycling. This update set out the new default requirements for premises in scope of Simpler Recycling should include containers for residual (non-recyclable) waste, food waste (allowance to mix food and garden waste for applicable authorities), paper and card, all other dry recyclable materials such as plastic, metal and glass.
- 5.6 This precludes Co-mingled collections, as Ipswich Borough Council currently operate, without additional administration and the submission of a TEEP assessment to DEFRA outlining why it is not Technically or Environmentally Practicable to operate a preferred Twin Stream Recycling model.
- 5.7 All service models under consideration are operated and well established elsewhere. Officers have undertaken a series of discussions

with other authorities in Greater Manchester, Lancashire and Lincolnshire, where a Twin Stream model is utilised, in some cases alongside 3 weekly refuse, to better understand the real-world practicalities.

5.8 Discussions have also taken place with the company who currently process Suffolk's paper and cardboard. The company are very clear that their preference is to receive material via Twin Stream services for the following reasons:

- Twin Stream collection methods provide a higher quality of paper and cardboard.
- Twin Stream collections for paper and cardboard typically result in lower levels of contamination, including glass.

6. Risk Management

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
Inability to implement a compliant set of recycling services.	Lack of consistency. Public dissatisfaction. Model not compliant with policy. Inability to receive pEPR repayment.	Approve proposed services and associated options for use	2	2	Approval on a model agreed. Closely follow models created and process guidance
Lack of Public support for proposed changes.	Reputational damage. Weakened application to the Secretary of State. Weakened financial returns	Open, thorough, well designed and wide public communications	3	2	Well designed engaging communications & strong evidence base.
Failure to secure required cooperation from other	Delays to the process.	Cross boundary working with neighbouring authorities.	3	2	Early contact at a senior level to ensure cross boundary cooperation

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
authorities if chosen collection method different.	Less complete coverage for communications Varied messages				
Failure to secure Secretary of State approval for chosen collection method.	TEEP assessment required. Profiling required for revenue return.	Managers are fully appraised of consequence of each collection model.	2	3	Full & well evidenced submission meeting all the criteria set out in the Regulations
Lack of progress due to insufficient resources	Delays Poor public perception	Resource planning	3	2	Ensure adequate resources to undertake and complete the process

7. Environment and Climate Change

- 7.1 The Council has declared a climate emergency and has resolved to start working towards becoming carbon neutral by 2030. All Council decisions should take into account and respond to the potential impact that they will have on the climate and wider environment.
- 7.2 Simpler Recycling and its overarching aims are designed to reduce the amount of waste produced, increase the reuse and recycling of waste, resulting in a significantly reduced quantity of residual waste.
- 7.3 The Environment Act 2021, in particular the element of Simpler Recycling, aims to develop the UK's circular economy, increasing the lifespan of products and packaging and reducing the demand for virgin materials. It also sets targets to increase the UK's municipal recycling rate to 65% by 2035. This is vital to address the UK's plateauing recycling rates.
- 7.4 The Council will consider the impact of the implementation of the Simpler Recycling requirements at each stage as these plans are developed.

8. Equalities, Diversity and Community Implications

- 8.1 Under the general equality duty as set out in the Equality Act 2010, public authorities are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation as well as advancing equality of opportunity and fostering good relations between people who share a protected characteristic and those who do not.
- 8.2 The protected grounds covered by the equality duty are: age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, and sexual orientation. The equality duty also covers marriage and civil partnership, but only in respect of eliminating unlawful discrimination.
- 8.3 The law requires that this duty to have due regard be demonstrated in decision making processes. Assessing the potential impact on equality of proposed changes to policies, procedures and practices is one of the key ways in which public authorities can demonstrate that they have had due regard to the aims of the equality duty.
- 8.4 The Government's requirement for councils to introduce Simpler Recycling from all households by 31st March 2026 will affect daily life in Ipswich and it's imperative that the Council considers the impact of this on all residents. The equality, diversity, and community implications of the implementation of either a Twin Stream fortnightly or 3 weekly schedule, or a Co-mingled fortnightly or 3 weekly residual service will be considered carefully as part of the decision making process.
- 8.5 An Equality Impact Assessment has been carried out, which is included as Appendix 1. The three potentially affected groups who could be negatively impacted have been identified as Age, Disability and Pregnancy in its link to very young children in households.
- 8.6 Mitigations have been suggested for each of these and the impact is only likely to exist if there is a movement to 3 weekly refuse collection based on this being linked to the type and volume of waste in their refuse bins which cannot be recycled. It is not anticipated that there would be an impact on people with any protected characteristic if the Council stays with fortnightly refuse collections.
- 8.7 As this decision is still to be made, this EQIA will be revisited when that has happened.

9. Crime and Disorder Impact

- 9.1 The proposals in this report will have no direct impact on crime and disorder in the Borough.

- 9.2 The service implementation plans required to successfully comply with the Government requirements will be developed over the coming months and will consider the impact on crime and disorder.

10. Financial Considerations

- 10.1 Simpler Recycling aims to significantly improve recycling services as well as introduce nationwide consistency. Government has committed that the additional requirements will be funded in two ways:
- I. All costs relating to packaging waste and recycling costs will be met through packaging Extended Producer Responsibility (pEPR) payments from packaging producers;
 - II. All other new requirements on councils will be funded by Government under the New Burdens doctrine.
- 10.2 DEFRA has allocated the Council an initial estimated £1,573,000 in pEPR payments based on a modulated figure using 2021 recycling figures for the financial year 2025/26.
- 10.3 Whilst the pEPR payment may still change, in order to provide certainty to authorities, the UK government is guaranteeing that in 2025/26 the Council will receive at least the amount displayed above.
- 10.4 Payments in future years may be linked to the collection model, recycling performance and/or costs.
- 10.5 The current cost for operating the Mixed Recycling service is c £1.3m pa. There would be a c. £0.1m pa additional cost to IBC for a Co-mingled option due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF. There would be a c. £0.23m pa additional cost to IBC associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins. Additional costs will be covered by the pEPR payment.
- 10.6 If a Twin Stream Model is the chosen approach, the Council will fund the additional bins required for Twin Stream through the existing framework and method for purchasing wheeled bins using capital borrowing over 10 years. The total amount is £1,772,884 and this will require a payback of £226,270 per annum. This cost will be a one-off purchase and any replacements for damaged, lost or stolen bins will be processed via the replacement policy at that time.
- 10.7 The Council would need to arrange for delivery of these bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed by the Waste Service at Layard House.

10.8 The below table identifies the capital and revenue implications associated with the implementation of a Twin Stream collection model if the inhouse delivery option is preferred.

Table 1 – In house delivery

Twin Stream Bins Delivered in house	2025/26 (£)	2026/27 (£)	2027/28 (£)	2028/29 (£)	2029/30 (£)
Capital Setup Cost	1,772,880				
Total Capital Cost	1,772,880				
MRP*		141,280	148,270	155,610	163,310
Interest*		84,990	77,990	70,650	62,950
Total Capital Charge to Revenue	-	226,270	226,260	226,260	226,260
Estimated Delivery Cost	236,000				
Net Cost to General Fund	236,000	226,270	226,260	226,260	226,260
Council Tax Band B Equivalent	4.56	4.37	4.37	4.37	4.37

**MRP & Interest are based on 10 year borrowing and interest rates were provided on 07/02/25.*

10.9 The below table identifies the capital and revenue implications associated with the implementation of a Twin Stream collection model if an externally contracted delivery service is preferred.

Table 2 – Externally contracted delivery service

Twin Stream Bins External Delivery	2025/26 (£)	2026/27 (£)	2027/28 (£)	2028/29 (£)	2029/30 (£)
Capital Setup Cost	1,772,880				
Total Capital Cost	1,772,880				
MRP*		141,280	148,270	155,610	163,310
Interest*		84,990	77,990	70,650	62,950
Total Capital Charge to Revenue	-	226,270	226,260	226,260	226,260
Estimated Delivery Cost	354,000				
Net Cost to General Fund	354,000	226,270	226,260	226,260	226,260
Council Tax Band B Equivalent	6.84	4.37	4.37	4.37	4.37

**MRP & Interest are based on 10 year borrowing and interest rates were provided on 07/02/25.*

10.10 It is proposed that £1.8m is added to the 2025/26 Capital Programme for the procurement of additional bins required. The ongoing revenue costs associated with this investment will be updated during the MTFP 2026/27 budget setting process.

- 10.11 The one-off revenue cost of £236k or £354k for the delivery of the bins in 2025/26 will be funded by the pEPR grant.

11. Legal Considerations

- 11.1 The Environment Act 2021 amended the Environmental Protection Act 1990 to include new requirements relating to the separate collection of waste in England.
- 11.2 Where appropriate Public Sector Procurement Frameworks will be used that are fully compliant with public procurement regulations, helping to reduce procurement complexity and risk. The use of Public Sector Procurement Frameworks is fully compliant with the Council's Contract Standing Orders.
- 11.3 Where it is not deemed appropriate for officers to use Public Sector Procurement Frameworks the tender processes will comply with the Council's Contract Standing Orders and with UK procurement legislation.

12. Performance Monitoring

- 12.1 Simpler Recycling is considered a key project by the Council's Corporate Management Team (CMT) and is subject to the oversight and governance of CMT on an ongoing basis.
- 12.2 The Council's Head of Waste and Fleet services will be responsible for leading the procurement of any required wheelie bins in conjunction with the Council's finance, procurement and legal teams.
- 12.3 Executive is recommended to approve that a Councillor Working Group is formed to consider officer proposals for the public communications campaign that will be needed in order to prepare Ipswich residents for the changes they need to make as a result of the implementation of Simpler Recycling.
- 12.4 The Council's recycling performance will be reportable to DEFRA and will continue to be subject to Overview and Scrutiny as part of the annual Portfolio meeting.

13. Conclusions

- 13.1 Government has legislated for major reforms to waste collection and packaging, requiring councils to align their waste and recycling services with new nationwide Simpler Recycling requirements. For Ipswich Borough Council this will mean adding a new weekly collection of food waste and enhancing recycling to also collect glass bottles & jars and cartons (Tetrapak) by 31st March 2026, then also plastic film by April 2027.

- 13.2 Due to what are expected to be extended lead times on the manufacture and supply of bins, if the Twin Stream model is adopted it is considered prudent to undertake the procurement of bins as early as possible to ensure that orders are placed which ensures that deliveries are received at least 6 months prior to commencement of the service.
- 13.3 If the Twin Stream model is adopted the Council would need to arrange delivery of additional bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed by the Waste Service at Layard House.

14. Recommendations

That Executive:

- 14.1 **Notes the Government has legislated for major reforms to waste collection and packaging, requiring councils to align their waste and recycling services with new nationwide Simpler Recycling requirements from 1st April 2026.**
- 14.2 **Authorises the Head of Waste and Fleet, in consultation with the Portfolio Holder for Environment and Transport, to commence planning for and implementation of the recommended Twin Stream Mixed Recycling model along with the recommended continuation of the fortnightly residual waste collections.**

Reason: to implement a compliant mixed recycling collection service by 31st March 2026.

Subject to 14.2:

- 14.3 **Authorises the Head of Waste and Fleet, in consultation with the Portfolio Holder for Environment and Transport, the Head of Procurement, the Head of Legal and Head of Finance, to undertake the procurement for the additional bins and distribution method required, to be undertaken through the use of Public Sector Procurement Frameworks and/or open tender, either in isolation, and/or in conjunction with other Suffolk local authorities, and/or acting as lead authority in any part of the procurement for all the Suffolk local authorities.**
- 14.4 **Recommends to Council approval of an additional £1.8m to be included in the Capital Programme for 2025/26 to make financial provision for the procurement of the additional bins required.**
- 14.5 **Authorises the Assistant Director for Operations, in consultation with the Portfolio Holder for Resources and the Portfolio Holder for Environment and Transport, Section 151 Officer, Head of Legal and Head of Procurement, to enter into contracts for the supply of bins**

and the distribution method required to implement a compliant recycling collection service by 31st March 2026, provided that it is within the budget set out in paragraph 10 of this report.

OR:

- 14.6 Reserves the contract award to Executive and requests that the Head of Waste and Fleet brings a further report to a future Executive meeting to enable this decision.**

Reason: To ensure that the Council avoids delay and supply chain issues in the procurement of bins to implement a compliant recycling collection service by 31st March 2026.

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Appendix 1

Equality Impact Assessment (EQIA)

Title of EQIA	Mixed recycling model and frequency of residual waste collection
Date	06/03/2025
Officer carrying out screening	Chris Taylor – Head of Waste & Fleet
Project Sponsor	Hannah Leys – Assistant Director Operations

The characteristics protected by the Equality Act are: **Disability, Age, Sex (gender), Gender reassignment, Marriage/civil partnership, Pregnancy/maternity, Race, Sexual orientation and Religion/belief**

By law we must have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Further information on each of the characteristics can be found at the end of the document

1. Project/Proposal/ Service changes

<p>What is proposed?</p>	<p>Under Simpler Recycling legislation changes Ipswich Borough Council will need to either provide new services or alter existing services to collect: food waste (weekly), glass bottles and jars, cartons from April 2026 and plastic film by April 2027. This introduction will improve the recycling product and increase recycle rates in line with national changes.</p> <p>A mixed recycling model is being considered taking an approach of either Twin Stream or Co-mingling.</p> <p><u>Twin Stream</u> A Twin Stream recycling model will introduce an additional recycling wheeled bin (Green). This will mean residents will separate their recycling into 2 bins rather than the current co-mingled operation. This will also see the introduction of glass recycling in the plastic and glass (Green) bin. This approach based upon a fortnightly residual waste collection would see the collection schedule in a 4-week cycle as follows:</p> <p>Mixed recycling model and frequency of residual waste collection Week 1 Residual (Black) Week 2 Recycling Paper and Card (Blue) Week 3 Residual (Black) Week 4 Recycling Plastics and Glass (Green)</p> <p><u>Co-mingle</u> A Co-mingle model would be the collection of the new full range of recyclable materials in one recycling bin, for subsequent sorting. This is the model currently in place.</p> <p><u>Residual Collections</u></p> <p>In addition, Government guidance published in November 2024 states that waste collection authorities should continue to decide collection frequency and methodology for collecting the residual (non-recyclable waste). Currently residual waste collections are scheduled to be every 2 weeks however a 3-week option is available.</p> <p>At this point the EQIA is based on the potential decisions as the specific choices have not yet been made so this document will be updated specifically based on the option and any changes to frequency which are made. This is not proposed to be the final document but show a reflection of equality considerations to date.</p>
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Why are the changes being introduced?	<p>Simpler Recycling legislation comes into effect for domestic households in April 2026 and these changes will ensure Ipswich Borough council is compliant to the changes. The changes are being introduced to improve recycling rates across the country and to introduce a level of consistency in collection operations. This is a national policy change with limited room for bespoke options so any options considered must fall within legislative guidelines.</p>
What evidence is being used to support this Equality Impact Assessment, and how is it being used?	<p>No specific information on current service users is utilised in the development of this EQIA.</p> <p>With the national legislative changes impacting all residents, and the decision not yet specific about the option chosen to comply with this legislation, the impact on any one group of individuals is not possible to measure.</p> <p>For the purposes of demonstrating our recognition of our equality duty, in this document we have considered where there may be potential impacts on a characteristic and when the decision is made to implement a specific model, these will be revisited to ensure any mitigations can be made where possible.</p>
How will this change be implemented?	<p>The changes will go through a communication plan to the residents updating of the relevant change including all advice on how to use the bins. If a Twin Stream model is adopted, then additional bins will be ordered and supplied to the residents prior to the go live date for the collections which will include advice on how to use the bins.</p> <p>The website and relevant waste guides will be updated online to supply all the information around the mixed recycling options with the customer service team also trained on how to support residents through the changes.</p> <p>The bin collection calendar which is available to residents online and able to print will also reflect the specific collection days for each bin.</p> <p>Due to this being national legislation, there is only a limited scope for the Council to define the services in order to comply with the changes.</p>

2. Equality Impact Analysis

Summary

The impact of implementation of changes to this service will be universal to all residents, but the specific impact may vary where there is a need based on housing type to vary the delivery model (e.g. communal bins for flat blocks) which at this stage is not known.

There is no reason to anticipate that the users of these services fall predominantly into any one category below in a way which increases the impact on that community of people or in a way which discriminates against them give the universal service. The Council has noted that due to the type of waste which is generated by households with specific medical conditions or very young children, there may be an impact on people who are permanently or temporarily in these positions. Until the exact nature of the changes have been determined, the scope of the impact is not yet know, so this document will highlight the potential impacts, and will be updated with more specific detail when the decision has been taken.

Who is affected?	Impact e.g., Positive/ Negative/ No Impact	Explanation of Impact	Actions to mitigate any adverse impact or further promote positive impact
Age	Potentially negative	Assisted bin collections currently in place to support with bin collections for those who are frail due to old age or health conditions This is a free service and can be requested by any resident meeting the criteria even with an increase in the number of bins.	Assisted bin collections will continue to mitigate this impact.

Who is affected?	Impact e.g., Positive/ Negative/ No Impact	Explanation of Impact	Actions to mitigate any adverse impact or further promote positive impact
		<p>Movement to 3 weekly may cause concerns from families with additional waste from nappy or from adult hygiene or medical waste which may be more likely due to age but is also covered by disability below.</p> <p>Access to any material online where users may be digitally excluded which is more likely for those residents who are older based on data.</p>	<p>This would be monitored if applied and actions including review of bin sizes or collections would be explored. It is not known at this time whether this will be an impact but we will seek to engage users to identify if it becomes an issue.</p> <p>Ensure that various media outlets are utilised in order to reach all audiences. Relay the messaging through trusted networks such as local community and voluntary groups where we know of high older or digitally excluded populations.</p>
Disability	Potentially negative	<p>Assisted bin collections currently in place to support with bin collections for those who have a need due to disability, This is a free service and can be requested by any resident meeting the criteria even with an increase in the number of bins.</p> <p>Movement to 3 weekly may cause concerns from families with additional medical waste or hygiene products linked to their disability either for volume or time spent in the bin.</p>	<p>Assisted bin collections will continue to mitigate this impact.</p> <p>This would be monitored if applied and actions including review of bin sizes or collections would be explored. It is not known at this time whether this will be an impact but we will seek to engage users to identify if it becomes an issue.</p>

Who is affected?	Impact e.g., Positive/ Negative/ No Impact	Explanation of Impact	Actions to mitigate any adverse impact or further promote positive impact
		Access to any material online where users may be digitally excluded or use accessibility tools.	Ensure that various media outlets are utilised in order to reach all audiences. Relay the messaging through trusted networks such as local community and voluntary groups where we know of digitally excluded populations.
Gender reassignment	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts
Pregnancy and maternity	Potentially negative	Movement to 3 weekly may cause concerns from families with additional waste from nappy	This would be monitored if applied and actions including review of bin sizes or collections would be explored. It is not known at this time whether this will be an impact, but we will seek to engage users to identify if it becomes an issue.
Race	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts
Religion or belief	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts
Sex/Gender	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts
Sexual orientation	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts
Marriage and civil partnership	No anticipated impact	No impact has been identified under this characteristic	Will be monitored for any unanticipated impacts

3. Equality Objectives

<p>Does the report/process meet Ipswich Borough Council's equality objectives:</p>	<p>The three potentially affected groups who could be negatively impacted have been identified as Age, Disability and Pregnancy in its link to very young children in households.</p> <p>Mitigations have been suggested for each of these and the impact is only likely to exist if there is a movement to 3 weekly refuse collection based on this being linked to the type and volume of waste in their refuse bins which cannot be recycled. Is not anticipated that there would be an impact on people with any protected characteristic if the Council stays with 2 weekly collections.</p> <p>As this decision is still to be made, this EQIA will be revisited when that has happened.</p>
<p>The report will help us to 'eliminate unlawful discrimination, harassment & victimisation' in the following way(s):</p>	<p>Mitigations put forward will mitigate any potential impact on key characteristics, but this change is not expected to have any relation to harassment or victimisation.</p>
<p>The report helps us to 'advance equality of opportunity...' in the following way(s):</p>	<p>The impact is neutral in this respect – mixed recycling changes and residual collections would have no positive or negative impact in this regard.</p>
<p>The policy helps us to 'foster good relations...' in the following way(s):</p>	<p>The impact is neutral – mixed recycling changes and residual collections would have no positive or negative impact in this regard.</p>
<p>The new provisions will be reviewed in the following way(s):</p>	<p>Should any disproportionate impact be noted which should be mitigated under the Equality Duty, this would be investigated.</p> <p>This EQIA will be reviewed in light of the decision being taken.</p>

	Should anyone report a detrimental impact, this will be investigated and any reasonable additional mitigations will be explored. If that happens, this EQIA will be updated accordingly.
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4. Sign Off

Assessment Author:	Chris Taylor	Date: 06/03/2025
Project Sponsor:	Hannah Leys	Date: 06/03/2025

Definition of the nine Protected Characteristics listed under the Equality Act 2010

Age	Where this is referred to, it refers to a person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 - 30 year olds).
Disability	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	This refers to a person who is proposing to undergo, is undergoing or has undergone a change from one gender to another. The Equality Act introduced a number of changes to the legal protection of transgender and transsexual people. The Act no longer requires a person to be under medical supervision to be protected - for example, a woman who decides to live permanently as a man (or visa-versa), but does not undergo any medical procedures is protected by law.
Marriage and civil partnership	Marriage is no longer restricted to a union between a man and a woman but now includes a marriage between same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	This refers to a group of people defined by their race, skin colour, and/or nationality (including citizenship) ethnic or national origins. The term ethnic minority community is used to define a group of people that is numerically smaller than the predominant white British community. This includes people from communities such as Irish, Turkish, Cypriot, Eastern European and Travelling people.
Religion and belief	The term "religion" refers to both the personal practices related to communal faith and to group rituals and communication stemming from shared conviction. Belief can include religious and philosophical beliefs, including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in this definition.
Sex (Gender)	This refers to either a male (man) or female (woman).
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Further information on the protected characteristics can be found on the [Office of Public Sector Information Website](#)

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6

COMMITTEE: EXECUTIVE **REF NO:** E/24/57
DATE: 8 APRIL 2025
SUBJECT: SCRUTINY TASK & FINISH GROUP
- TOWN CENTRE CLEANLINESS
PORTFOLIO HOLDER: COUNCILLOR PHILIP SMART
SENIOR OFFICER: HANNAH LEYS

Short description of report content and the decision requested:

This report sets out the recommendations made by the Strategic Overview and Scrutiny Committee through its Town Centre Cleanliness Task and Finish Group.

Ward(s) affected:

All

List of Appendices included in this report:

None

This report has been prepared by Hannah Leys, Assistant Director of Operations.

Email: hannah.leys@ipswich.gov.uk

This report was prepared after consultation with:

Internal consultees:

Members of the Task and Finish Group

Councillors Frost (Chair), G Forster, T Grant, R Pope, T Lockington, L Reynolds and R Downes.

Members of Strategic Overview and Scrutiny Committee

Portfolio Holder for Environment and Transport

Head of Service and Operations Managers for Waste

Corporate Management Team

Communications Team

External consultees:

None

The following policies form a context to this report:

(all relevant policies must also be referred to in the body of the report)

Corporate Strategy – Proud of Ipswich: Championing our Community and Revitalising our Town

LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW

(papers relied on to write the report but which are not published and do not contain exempt information)

1. None

OTHER HELPFUL PAPERS

(papers which the report author considers might be helpful – this might include published material)

- 1. OS/23/05 – Work Programme – Proposal Form on Town Centre Cleanliness - Strategic Overview and Scrutiny Committee – 31 August 2023**
- 2. OS/24/14 - Report of Town Centre Cleanliness of Task and Finish Group - Strategic Overview and Scrutiny Committee – 21 November 2024**

1. Executive Summary

- 1.1 The Council has a statutory duty to ensure that its land, or land for which it is responsible, is, so far as is practicable, kept clean of litter and refuse.
- 1.2 The Council discharges that duty through its award-winning in-house Street Cleansing team consisting of 34 people, utilising 16 specialist vehicles, operating 24 hours a day, 365 days a year across the entire Borough, with the outcomes of that activity resulting in a 99% achievement on required levels of street cleanliness.
- 1.3 Following the establishment of a Town Centre Cleanliness Task and Finish Group by the Council's Strategic Overview and Scrutiny Committee, the Task and Finish Group have made a number of recommendations on Town Centre Cleanliness for the consideration of Executive.
- 1.4 Executive is asked to note both the recommendations of the Task and Finish Group as set out in this report and the subsequent actions implemented.

2. Background

- 2.1 Ipswich Borough Council has a duty under EPA 1990 S89(1) to ensure that its land, or land for which it is responsible is, so far as is practicable, kept clean of litter and refuse.
- 2.2 The Council's Street Cleansing team consists of 34 people, utilising 16 specialist vehicles, operating 365 days a year across the entire Borough, with a 24 hr call out system.
- 2.3 Annually the team empty 44,000 litter bins, collect 728 tonnes of litter, and undertake 8,000 miles of sweeping on pavements and highway.
- 2.4 The team are mobilised on average over 200 times each year out of normal working hours, to respond to requests for collection of deceased animals, drug related litter, glass litter and cleansing of body fluids from streets.
- 2.5 Across the year ending March 2025, the inspections undertaken for street cleanliness showed that street cleanliness was at satisfactory levels in 99% of those inspections.
- 2.6 In addition to the scheduled activities the street cleansing team will spring into action following major events in the town to collect litter and return the public realm to its usual high standard of cleanliness. Recent examples of this include Ipswich Music Day, Christmas Lights switch on, the town centre celebrations following the final ITFC match in the 2024

season and the subsequent open top bus tour and celebrations in Christchurch Park.

- 2.7 The Street Cleansing team have been nominated as finalists for the APSE Best Service Team: Waste, Recycling and Streetscene of the year award in both 2023 and 2024.
- 2.8 The Street Cleansing team was awarded the Outstanding Service Award 2025 by Keep Britain Tidy for its innovative Ipswich Town Football Club gateway project where 21 vibrantly wrapped, football and recycling themed bins were installed in readiness for Ipswich Town's return to the Premier League in August 2024 with the aim of reducing litter around Portman Road on match days.
- 2.9 The Council is one of only 8 local authorities across the country that have successfully applied to the Chewing Gum Task Force and been awarded funding three years in a row as a result of the high standard of work delivered.
- 2.10 The service has an Education Policy and Performance team who pro-actively visit schools and attend events to promote a cleaner Ipswich, through the town's Love your Street Litter campaign incorporating Digby the blue octopus litter mascot who encourages people to get involved and love their street by taking part in organising community litter picks. There were an estimated 15,000 in-person interactions through the year at all events attended, with a considerable additional impact achieved through online activity.
- 2.11 In the Town Centre there is a dedicated team of 7 cleansing staff working over a 15 hour period from 05:00 to 20:00 daily, to keep the town centre clear of litter, collecting drug related litter, removing chewing gum, removing graffiti and steam cleaning the pedestrianised areas.

Town Centre Cleanliness - Task and Finish Group

- 2.12 At its meeting on 31 August 2023 the Strategic Overview and Scrutiny Committee considered a proposal regarding Town Centre Cleanliness and resolved to establish a Task and Finish Group.
- 2.13 Councillors Cathy Frost (Chair), Gary Forster, Tracy Grant, Richard Pope, Tim Lockington, Lee Reynolds and Roxanne Downes were appointed to the Task and Finish Group, which met on 28 November 2023, 11 January 2024, 22 February 2024, 28 August 2024, 3 October 2024 and 16 October 2024.
- 2.14 At their first meeting, Councillor Frost was elected as Chair. Councillor Frost introduced the topic and explained that the proposal had been put forward to consider the perception of cleanliness in the Town Centre. One of the priorities of the Corporate Strategy 2023 is for a thriving town centre. Therefore, it was necessary to identify what residents meant by

cleanliness and what could be done to feed into the strategy for street cleansing.

- 2.15 The scope of the review was discussed, and the following elements were raised:
- It was necessary to identify what the resident's perception was on cleanliness.
 - To concentrate on street cleansing.
 - Communicating to residents who was responsible for what services.
 - Educating businesses when bin collections took place.
- 2.16 This Task and Finish Group reported back to the Strategic Overview and Scrutiny Committee on 21 November 2024 and that committee approved the recommendations proposed by the Task and Finish Group, set out below.

Recommendations of the Task and Finish Group

- 2.17 Below are the recommendations of the Group, some of the early discussions of the group have progressed during the cycle of meetings therefore some action has already been taken by officers and recommendations are to support outcomes. Where action has been taken this is noted below.
- 2.18 The recommendations are broken down into four key areas of Communications, Waste, Waste Enforcement, and Additional Actions.

Communications

- 1) That a 'This is Your Town' Comms Plan is adopted with the aim of encouraging the public towards a change of perception and providing consistent messaging about the work IBC already does.

Campaign objectives:

- Increase public awareness of the negative impact of littering and the importance of maintaining a clean environment.
 - Encourage personal responsibility for disposing of waste.
 - Create community pride and promote community action.
 - Collaborate with community groups/volunteers/Ipswich (Central/SCC/Residents/businesses/schools)
- 2) That an annual activity plan of Communications is adopted to include:
- Regularly social media contact to keep the message current
 - Event activity – Ipswich Events, ITFC home games seasonal activity
 - Clear messaging which highlights the yearlong efforts to keep the town clean
 - Digital content to support initiatives
 - Quarterly reporting to measure successes

- Collaborative communications with SCC around weeds and detritus

Action taken: A Town Centre Cleanliness communications campaign is being developed. This campaign's purpose is to develop a sense of ownership and pride among residents, and to encourage everyone to take responsibility for the cleanliness of their surroundings. By utilising the strapline "This is Your Town," the campaign aims to inspire community participation and collaboration in keeping Ipswich clean, litter-free, and welcoming.

- 3) An initial pilot of 'Report it' bin stickers has been undertaken on bins in the Town Centre and the Waterfront. These stickers encourage the reporting of problems with bins and provide a QR code which takes users to directly to the report it page. If successful, then the recommendation is to extend the stickers across other locations and bins.

Action taken: This has been trialled and the level of reporting from these stickers has been extremely low, therefore this is not being recommended for additional rollout at this time; however, this will continue to be monitored.

- 4) That the new additional bin collection service for excess waste and contaminated bins is made a permanent service if the trial is successful. This is a service to compliment the current bulky collection service supporting residents struggling to remove excess waste and providing residents who cannot get to local household recycling centre the option to pay for a collection.

Action taken: The service is now fully operational with the ability for residents to book online or through the Customer Service Centre. It has now also been expanded to cover Brown bins and will support as an additional option alongside the Brown bin subscription service.

- 5) That opportunities are pursued to investigate additional streams/grants available to assist in the purchase of new equipment or machinery for the Town Centre or which focuses on funding for specific cleansing schemes or projects. This would include any opportunities to collaborate with ITFC, SCC and Ipswich Central.

Action taken: This is accepted and will be an ongoing exercise expected to continue for the foreseeable future. A bid has already been submitted for funding for Chewing Gum removal focused on areas of cultural interest which will include the Town Centre.

- 6) That options are explored around seagull proof bags and the costs associated with this and opportunity for the use of MAD or other funding.

Action taken: The main action is associated with treating the root cause of the issue, which is that businesses place bags on the street for extended periods, rather than considering when their actual waste collection will take place. Improvements can be achieved through

ongoing waste enforcement action. Impacts will be monitored, and alternative options explored if required. It is confirmed that the use of MAD money is not a viable option.

- 7) That there is an increase in enforcement in the town centre, and this is publicised – focusing on general enforcement but including a specific focus on Business waste in the town and issues with bin bags left out too early or on the wrong days as this was a key message and concerns arising from group discussions.

Action taken: Officers are focusing on enforcement across the Town Centre and will monitor for improvements with bin bags left out.

- 8) To explore options with the enforcement and planning teams on the use of a Business Zone Public Spaces Protection Order (PSPO), these are intended to deal with persistent anti-social behaviour in a local area that is detrimental to the community's quality of life and can include detail on how and when waste should be presented and enforced.

Action taken: A review has been undertaken on options around a specific Business Zone PSPO and it has been determined that this is not required as there is already sufficient legislation around businesses and how they deal with their waste.

Additional suggested actions – not in scope of the working group

- 9) Investigate opportunities for using vinyls for empty shop windows with the planning team. This could create an improved visual appearance across the town centre.

Action taken: Officers from across Council departments will seek to progress and involve Ipswich Central, although it should be noted that this is out of the original scope and a challenging area due to the need to work across building owners.

3. Relevant Policies

- 3.1 Corporate Strategy – Proud of Ipswich: Championing our Community and Revitalising our Town. The 'Financially Sustainable Council Providing Good Quality Services' priority within the Proud of Ipswich.

4. Options Considered / Under Consideration

Option 1

- 4.1 That Executive note the recommendations of Strategic Overview and Scrutiny Committee as set out in section 2.18 of this report.

This option is recommended as recommendations are reasonable and actionable and will support in achieving awareness and improvements around perceptions of the Town Centre Cleanliness.

Option 2

- 4.2 That Executive does not note the recommendations of Strategic Overview and Scrutiny Committee as set out in section 2.18 of this report.

This option is not recommended as it fails to provide the Strategic Overview and Scrutiny Committee with a response to the recommendations it made about this subject.

5. Consultations

- 5.1 No external consultation has taken place in relation to this report.
- 5.2 Internal and external consultation was undertaken by the Strategic Overview and Scrutiny Committee Task and Finish Group as set out in report OS/24/14. This included input from officers across Public Protection and Environmental Health, Communications and Marketing and Waste. Reflections were also received from Councillor John Cook, Portfolio Holder for Communities and Sport, and Councillor Philip Smart, Portfolio Holder for Environment and Waste.
- 5.3 A question set was developed by the Task and Finish Group and issued to Ipswich Central for response. Lee Walker the Chief Executive of Ipswich Central attended a meeting of the Task and Finish Group to respond to the questions raised.
- 5.4 Consultation with the Portfolio Holder has been undertaken to ensure that the proposed responses meet with the expectations for the service.

6. Risk Management

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
Not noting a response to the Strategic Overview and Scrutiny Committee	Suggests a lack of priority being given to the recommendations from the Task and Finish Group. Lack of improvement in perceptions around town centre cleanliness and actions to improve the Town Centre.	Draft response prepared for approval.	2	2	Note a response to the recommendation.

7. Environment and Climate Change

- 7.1 The Council has declared a climate change emergency and has resolved to start working towards becoming carbon neutral by 2030. All Council decisions should take into account and respond to the potential impact that they will have on the climate and wider environment.
- 7.2 The decision to note the response to the recommendations from the Scrutiny Task and Finish Group on Town Centre Cleanliness will see the implementation of actions which will have a positive impact on the environment within the immediate vicinity of the Town Centre by targeting littering and waste disposal in the town centre and promoting positive action and enforcement with waste.

8. Equalities, Diversity and Community Implications

- 8.1 Under the general equality duty as set out in the Equality Act 2010, public authorities are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation as well as advancing equality of opportunity and fostering good relations between people who share a protected characteristic and those who do not.
- 8.2 The protected grounds covered by the equality duty are: age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, and sexual orientation. The equality duty also covers marriage and civil partnership, but only in respect of eliminating unlawful discrimination.
- 8.3 The law requires that this duty to have due regard be demonstrated in decision making processes. Assessing the potential impact on equality of proposed changes to policies, procedures and practices is one of the key ways in which public authorities can demonstrate that they have had due regard to the aims of the equality duty.
- 8.4 The approval of the response to the recommendations of the Scrutiny Task and Finish Group on Town Centre Cleanliness does not have any direct impacts in relation to Equalities.

9. Crime and Disorder Impact

- 9.1 The decision to note the response to the recommendations from the Scrutiny Task and Finish Group on Town Centre Cleanliness is envisaged to have a positive impact on crime and disorder as improvement of the street scene and waste enforcement can have a positive impact on the wider environment and tackling of nuisance behaviour.

10. Financial Considerations

- 10.1 Some costs were established as part of the communications plan including advertising, branded signage and the school outreach programme which totalled approximately £4,500. Budget across the areas identified already exists within the Waste budget therefore these costs can be covered within the budget and resource already in place through reallocation of programmes and priorities.

11. Legal Considerations

- 11.1 There are no additional legal considerations to those already mentioned in the report.

12. Performance Monitoring

- 12.1 Providing this response will allow the Strategic Overview and Scrutiny Committee to monitor the implementation of the recommendations it has made.

13. Conclusions

- 13.1 The Council has a statutory duty to ensure that its land, or land for which it is responsible is, so far as is practicable, kept clean of litter and refuse.
- 13.2 The Council discharges that duty through its award-winning in-house Street-Cleansing team consisting of 34 people, utilising 16 specialist vehicles, operating 365 days a year across the entire Borough, with the outcomes of that activity resulting in a 99% achievement on levels of street cleanliness.
- 13.3 It is concluded that the recommendations put forward by the Task and Finish Group are appropriate and Executive is therefore able to formally report this to the Strategic Overview and Scrutiny Committee.
- 13.2 Executive are asked to note that actions have already begun to be implemented which include:
- The planned Town Centre Cleanliness communications campaign will help develop a sense of ownership and pride among residents, and to encourage everyone to take responsibility for the cleanliness of their surroundings.
 - A further bid for funding for Chewing Gum removal has been submitted and this is focused on areas of cultural interest which will include the Town Centre.
 - The additional one-off waste collection service is now fully operational with expansion to now include a brown bin collection

supporting the introduction of the paid for subscription service for infrequent users of the service.

14. Recommendations

14.1 That Executive note the recommendations of the Strategic Overview and Scrutiny Committee as set out in Option 1 of this report.

Reason: In order to provide a formal response to the Strategic Overview and Scrutiny Committee recommendations.

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COMMITTEE: EXECUTIVE **REF NO:** E/24/58
DATE: 8 APRIL 2025
SUBJECT: RESPONSE TO GOVERNMENT
CONSULTATION ON NORFOLK
AND SUFFOLK DEVOLUTION
PORTFOLIO HOLDER: NEIL MACDONALD
SENIOR OFFICER: HELEN PLUCK

Short description of report content and the decision requested:

The Government began a consultation on establishing a Mayoral Combined County Authority across Norfolk and Suffolk on 17th February 2025. The deadline for consultation responses is 13th April 2025.

This report provides a draft consultation response for Executive to consider prior to sign off and authorises the Chief Executive in consultation with the Leader of the Council to finalise and submit the response.

Ward(s) affected:

All

List of Appendices included in this report:

a) Appendix 1 Draft Consultation Response

*This report has been prepared by Helen Pluck, Tel: 01473 432002,
Email: helen.pluck@ipswich.gov.uk*

This report was prepared after consultation with:

Internal consultees:

Leader of the Council

Deputy Leader of the Council

Devolution and Local Government Reorganisation Working Group

External consultees:

N/A

The following policies form a context to this report:

(all relevant policies must also be referred to in the body of the report)

*Corporate Strategy – Proud of Ipswich: Championing our Community and
Revitalising our Town*

English Devolution White Paper

LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW

*(papers relied on to write the report but which are not published and do not
contain exempt information)*

1. **None**

OTHER HELPFUL PAPERS

*(papers which the report author considers might be helpful – this might
include published material)*

1. **English Devolution White Paper - [English Devolution White Paper - GOV.UK](#)**
2. **Consultation – Norfolk and Suffolk - [Norfolk and Suffolk devolution - GOV.UK](#)**

1. Executive Summary

- 1.1 The English Devolution White Paper was published in December 2024 and was followed by an invitation to unitary and upper tier councils to join a Devolution Priority Programme which would lead to the introduction of Directly Elected Mayors and Mayoral Authorities for regions not currently covered by such arrangements.
- 1.2 In January 2025, Suffolk County Council, with the support of the Suffolk District and Borough Councils, expressed an interest in the Devolution Priority Programme and, alongside Norfolk was confirmed onto the programme, known as the DPP, in February. As part of the process for forming a Mayoral Combined County Authority for Norfolk and Suffolk the government is required to run a public consultation.
- 1.3 This consultation started on 17th February and runs to 13th April 2025. Full details of the proposal and the consultation questions can be found at [Norfolk and Suffolk devolution - GOV.UK](#).
- 1.4 The Council wishes to respond to the consultation as the proposals will have a significant effect on the governance of Suffolk and Ipswich. A draft response to each question can be found in Appendix 1.
- 1.5 Overall, the council is supportive of the introduction of a Mayoral Authority for Norfolk and Suffolk but is concerned to ensure that the implementation of such an arrangement benefits Ipswich rather than taking investment and resources away from it. It is particularly concerned to ensure that Ipswich can play its part in the governance arrangements with a seat at the new authority's Board.
- 1.6 Entry onto the Devolution Priority Programme also serves to trigger a need for Local Government Reorganisation in Norfolk and Suffolk, and this has been the subject of other papers to Executive (E/24/55). Therefore, this paper is largely restricted to the matter of consultation on the establishment of a Mayoral Combined County Authority, save for the fact that new unitary councils will replace the two county councils on the Mayoral Authority once Local Government Reorganisation is complete.

2. Background

- 2.1 The English Devolution White Paper was published in December 2024 and was followed by an invitation to unitary and upper tier councils to join a Devolution Priority Programme which would lead to the introduction of Directly Elected Mayors and Mayoral Authorities for regions not currently covered by such arrangements.
- 2.2 In January 2025, Suffolk County Council, with the support of the Suffolk District and Borough Councils, expressed an interest in the Devolution

Priority Programme and, alongside Norfolk was confirmed onto the programme, known as the DPP, in February. As part of the process for forming a Mayoral Combined County Authority for Norfolk and Suffolk the government is required to run a public consultation.

- 2.3 This consultation started on 17th February and runs to 13th April 2025. Full details of the proposal and the consultation questions can be found at [Norfolk and Suffolk devolution - GOV.UK](#).
- 2.4 The Council wishes to respond to the consultation as the proposals will have a significant effect on the governance of Suffolk and Ipswich. A draft response to each question can be found in Appendix 1.
- 2.5 Overall, the Council is supportive of the introduction of a Mayoral Authority for Norfolk and Suffolk but is concerned to ensure that the implementation of such an arrangement benefits Ipswich rather than taking investment and resources away from it. It is particularly concerned to ensure that Ipswich can play its part in the governance arrangements with a seat at the new authority's Board.

3. Relevant Policies

- 3.1 Corporate Strategy – Proud of Ipswich: Championing our Community and Revitalising our Town.
- 3.2 It is expected that a Mayor for Norfolk and Suffolk will support the Council in delivering the Proud of Ipswich Strategy through the prioritisation of resources, strategic planning, investment and by using their convening power to support public sector reform.

4. Options Considered / Under Consideration

- 4.1 The Council is not obliged to respond to the consultation being held by government on the establishment of a Mayoral Combined County Authority, but Executive has the ability to choose to do so.

5. Consultations

- 5.1 Members of the cross party Devolution and Local Government Reorganisation Working Group have been consulted on the draft consultation response.

6. Risk Management

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
Council does not respond to consultation	Council's views don't influence direction of travel on Mayoral arrangements for Norfolk and Suffolk	Develop a consultation response	1	3	Draft response considered by Working Group and Executive and submitted.

7. Environment and Climate Change

- 7.1 The Council has declared a climate change emergency and has resolved to start working towards becoming carbon neutral by 2030. All Council decisions should take into account and respond to the potential impact that they will have on the climate and wider environment.
- 7.2 The Devolution White Paper sets out the role that Mayors are expected to have in relation to the Environment and Climate Change. It is anticipated that the Council will need to work with any Mayor for Norfolk and Suffolk on a cohesive approach to decarbonising the economy, and to environmental and climate leadership.

8. Equalities, Diversity and Community Implications

- 8.1 Under the general equality duty as set out in the Equality Act 2010, public authorities are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation as well as advancing equality of opportunity and fostering good relations between people who share a protected characteristic and those who do not.
- 8.2 The protected grounds covered by the equality duty are: age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, and sexual orientation. The equality duty also covers marriage and civil partnership, but only in respect of eliminating unlawful discrimination.
- 8.3 The law requires that this duty to have due regard be demonstrated in decision making processes. Assessing the potential impact on equality

of proposed changes to policies, procedures and practices is one of the key ways in which public authorities can demonstrate that they have had due regard to the aims of the equality duty.

- 8.4 There are no equality and diversity impacts to responding to the Government's consultation. It will be important that the Mayoral Authority sets out how it will achieve its equality and diversity responsibilities and support communities across the region in due course.

9. Crime and Disorder Impact

- 9.1 There are no direct crime and disorder impacts on the submission of a consultation response to government. In due course the Mayor is expected to play a key role in ensuring Public Safety as set out in the Devolution White Paper. This is likely to include taking responsibility for the current Police and Crime Commissioner and Fire & Rescue Authority functions.

10. Financial Considerations

- 10.1 There are no financial implications to the submission of the consultation response.

11. Legal Considerations

- 11.1 The proposal to introduce a Mayoral Combined County Authority for Norfolk and Suffolk falls under the Levelling Up and Regeneration Act 2023.
- 11.2 An English Devolution Bill is expected at some time in 2025 to legislate against the English Devolution White Paper.

12. Performance Monitoring

- 12.1 The consultation response must be submitted before midnight on 13th April 2025.

13. Conclusions

- 13.1 The Council supports the introduction of a Mayoral Authority for Norfolk and Suffolk but is concerned to ensure that the implementation of such an arrangement benefits Ipswich rather than taking investment and resources away from it. It is particularly concerned to ensure that Ipswich can play its part in the governance arrangements with a seat at the new authority's Board.

14. Recommendations

- 14.1 That Executive authorise the Chief Executive to finalise the consultation response set out in Appendix 1, in consultation with the Leader of the Council, and for it to be submitted ahead of the deadline.**

Reason: So that the Council participates in this important consultation.

Appendix 1

	Question	strongly agree / agree / neither agree nor disagree / disagree / strongly disagree / don't know / prefer not to say	Comments
1	To what extent do you agree or disagree that establishing a Mayoral Combined County Authority over the proposed geography will deliver benefits to the areas?	Strongly Agree	<p>A Mayoral Combined Authority for Norfolk and Suffolk will provide a much-needed voice for the sub-region, nationally and globally representing over 1.5 million people who live in 3500 square miles of rural, urban and coastal East Anglia.</p> <p>This voice, combined with the powers outlined in the English Devolution White Paper and the convening ability of an East Anglian Mayor will deliver benefits to Suffolk and Norfolk.</p> <p>However, it will be essential that the Mayor and the MCCA considers the needs of both counties and that neither perceives themselves to be the “poor relation” to the other.</p>
2	To what extent do you agree or disagree with the proposed governance arrangements for the Mayoral Combined County Authority?	Agree	<p>The Council recognises the limitations of the current legislation enacted by the previous government. It is concerned that at its inception the only full constituent members of the MCCA will be the two County Councils and that as such the major urban centres of Ipswich and Norwich have no direct representation within this Authority.</p> <p>It is recognised that District Councils may be “non-constituent members” but to date, Suffolk County Council has not discussed potential non-constituent membership with Ipswich Borough Council and this raises concern that Ipswich, the economic powerhouse of the county, will not have a voice in this important setting.</p> <p>Suffolk and Norfolk should be equal partners on the MCA, so it is vital that there is equal representation of the two counties.</p>
3	To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County	Strongly Agree	<p>A coordinated approach across a wider geography has the potential to enhance investment, infrastructure development and business growth including strategic infrastructure projects such as the Ely and Haughley rail junctions, Copdock road</p>

	Authority will support the economy of the area?		interchange and the Ipswich Northern Bypass. It is crucial that economic strategies address the distinct needs of urban centres such as Ipswich, as well as rural and coastal communities.
4	To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County Authority will improve social outcomes in the area?	Agree	There is concern that a one-size-fits-all approach may not sufficiently address localised challenges. Increased collaboration can contribute to improvements in areas such as housing, skills development, and public health.
5	To what extent do you agree or disagree that working across the proposed geography through a Mayoral Combined County Authority will improve local government services in the area?	Agree	<p>The link between the Devolution Priority Programme and the requirement for Local Government Reorganisation is helpful, providing that the outcome includes a “greater” Ipswich Council responsible for local government services across a wider area than the current Ipswich boundary which is little changed since 1835.</p> <p>An urban unitary council, centred on the greater Ipswich conurbation, with a seat on the Mayoral Strategic Authority will ensure a strong relationship between the council and the Mayor.</p> <p>The Mayor will play a key role in convening partnerships which will drive public sector reform and deliver improvements in public services across the region, resulting in better outcomes for residents and communities.</p>
6	To what extent do you agree or disagree that working across the proposed geography through a Mayoral Combined County Authority will improve the local natural environment and overall national environment?	Agree	Environmental policies and investment in green infrastructure could benefit from a coordinated regional approach, particularly in relation to climate resilience, transport decarbonisation, and biodiversity initiatives. However, specific urban environmental challenges, such as air quality, green space provision, and sustainable urban planning, must be prioritised alongside wider rural concerns.
7	To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County Authority will support the interests and needs of local communities and reflect local identities?	Agree	Ipswich has a vibrant local identity and a distinct urban character within the wider county geography. While regional collaboration is valuable, there should be no loss of focus on the specific needs of diverse communities.

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