

Local Pest Control Services and the impact of Waste Management processes on these



Report of the Residents' & Environmental Services Policy Overview Committee 2012/13

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Chairman's Foreword

I am pleased to present this review on Local Pest Control Services and the impact of waste management on these in Hillingdon. Population movement, urban development, waste disposal and even the weather are just some of the factors that combine together to influence pest populations. Pest control is a national issue that needs to be addressed at a community level as well as an individual one.

Research suggests that the rodent population can transmit diseases to humans. Therefore, it is of paramount importance to ensure the Council and residents work together to reduce this problem by addressing waste management.

This review looked at the Council's current role and responsibilities for pest control as well as proposals for the future. Given the simple message that poor waste management contributes to greater pest numbers, the review looked at how waste management education could be used to improve matters. The review also highlighted the current complexity of waste management and examined the various Council Departments involved in addressing the pests / waste management issue. The Council also needs to work with their external partners (such as Thames Water, British Waterways, London Underground, Network Rail, etc) to significantly reduce the pest problem in Hillingdon.

The education of the whole community in safe, efficient waste containment and disposal is fundamental to the limitation of pests in the Borough. This will need the support and participation of all identified internal and external partners.

I would like to thank the Committee and officers for all their hard work and particularly to our witnesses for their expertise and guidance.

Councillor Susan O'Brien

Summary of Recommendations

On the basis of the evidence received, the Committee made the following recommendations to Cabinet:

RECOMMENDATIONS

That Cabinet:

Domestic Housing

1. ask officers to request the support of the Hillingdon Registered Social Landlords Forum to encourage a provision for:
 - a. more uniform tenancy conditions to prevent pest infestation; and
 - b. improved communication to support, educate, advise and guide their residents about handling waste through 'Welcome packs' or other introductory material.
2. notes the roles of private landlords, social landlords and the Council (as a landlord) in terms of how pest infestations are dealt with effectively in tenanted properties; to work with these groups to ensure that all tenants are aware of best practice.
3. asks officers to encourage social responsibility of individual tenants and homeowners, whether in social or private sector housing, to properly manage their domestic waste to minimise pest problems through:
 - a. educational materials and leaflets;
 - b. the wider use of signage to re-enforce the necessity of effective pest control and waste management;
 - c. articles in Hillingdon People twice a year to remind residents about effective ways of managing waste; and
 - d. education through schools.
4. endorses the Council's enforcement methods, in the case of persistent offenders and individuals or groups who have been reminded of their responsibilities, to ensure that domestic waste is managed properly.
5. instructs officers to send the report to the National Landlords Association and other relevant bodies, representing private sector landlords for information and to promote a cohesive voluntary agreement among their members.

Pest Control Services

6. notes the Committee's endorsement of a new, more equitable approach to providing Pest Control Services following the BID review and the current concessions policy, which includes a free pest control service for all over 65's, disabled and those on benefits.

7. asks officers to ensure residents and landlords are aware of the services available from the Council to tackle pest problems, including an indication of costs. Cabinet also asks officers to encourage Registered Social Landlords to provide advice on the use of these services.

Waste Services & Enforcement

8. supports the education and encouragement of businesses to take full responsibility for the cleanliness of the land they occupy, as well as to comply fully with the “Duty of Care for Waste Management”.
9. supports the continuation of enforcement and alley gating schemes to be considered in areas where there is a high level of illegal dumping of waste. Both these methods are positive proven solutions to areas of the Borough with high pest infestation issues.

Resident Engagement

10. instructs officers to ensure that, when leaflets and waste campaigns are refreshed, they promote a universal message.

About the Review

OBJECTIVES

The main objective of this review was to understand the Council's role and responsibilities for pest control services and explore the relationship between this service and waste management processes.

The review also sought to provide a sound understanding of the different types of pests; the likely health implications posed by these to humans and the wider implications if they were to go unchecked.

In terms of waste management, the review also examined how food waste generated by residents and businesses was managed prior to, during and after the collection process to establish where improvements might be made.

In order to achieve this, Members were presented with evidence and research on pests, waste management processes, an overview of current collection arrangements, information on existing regulations and the practices of neighbouring authorities.

In undertaking this review the Committee also aimed to contribute to the Council's priority themes by ensuring that the following areas were considered:

- Our People – Putting our residents first and at the heart of all we do, promoting civic pride;
- Our Natural Environment – Protecting and enhancing the Borough's natural environment;
- Our Built Environment – Continue to improve our buildings, roads and footways and ensure that new buildings fit with the surrounding environment.

Reasons for the review

Evidence shows ¹ that the rat population in the UK has been steadily increasing, with marked rises in infestations in domestic premises in both urban and rural areas. A previous survey showed a 39% increase in infested domestic premises over the last 20 years. Subsequent surveys have shown a continuing increase in infestation levels with domestic premises in rural areas twice as likely to be infested with rats than those in urban environments.

Problems caused by rats can be divided into three main areas:

1. Health problems – rats have a role in the spread of many human pathogens, heightened by their close association with humans
2. Contamination of food stocks
3. Damage to property and materials – such as the gnawing of electrical cables or food bins

¹ Campaign for Responsible Rodenticide Use www.thinkwildlife.org.uk

There is a one hundred year old adage that humans are never more than six feet away from a rat - but it is not clear where the adage comes from. The leader of the wildlife programme at the Food and Environment Research Agency ² states that 50 metres is a much more realistic estimate. It is rare that rats are inside dwellings. Less than half a per cent of dwellings have rats and in those cases it would be a small number. About 3% of dwellings have rats outside, in the garden or compost heap and 5% of commercial properties. Around 5% of the sewers have rats present and around 40% of agricultural buildings and farms, where they have got lots food and shelter.

Housefly populations are predicted to increase due to long term favourable climatic conditions. Closer to home, Hillingdon officers highlighted that bedbug infestations have increased and this is an issue impacting on all local authorities, particularly those in urban areas.

Trends and patterns in population, development, hygiene standards, waste processes, funding for pest control services and even the weather (amongst many others factors) all impact upon pest populations. Pest infestations can affect individuals, their health and have knock on consequences for others and the local environment. With this in mind, the review sought to examine how waste management processes could be improved.

The Committee is keen to ensure that the services provided by Hillingdon Council aim to tackle this problem in a proactive and joined-up way.

TERMS OF REFERENCE

The terms of reference of the review were as follows:

- To understand the Council's roles and responsibilities in this area;
- To examine the current and planned service provision for pest control (domestic and commercial) and its relationship to waste management and anti-social behaviour;
- To understand the different types of pests, populations and likely infestation trends, including how this may impact on public health and social stigma;
- To examine the problems pests cause to individuals, local neighbourhoods, commercial businesses and the wider environment;
- To review the effect of temperature, climate, urban development and underground infrastructure (and any other factors) on pest populations;
- To explore how waste management processes and practices in Hillingdon (by residents, businesses, contractors and the Council) can help to mitigate any pest infestations;
- To explore how food waste generated by residents and businesses is managed prior to, during and after the collection process;
- To review any existing policies in this area and best practice elsewhere;
- To consider the importance, relevance and adequacy of public information available to residents and businesses;

² <http://www.bbc.co.uk/news/magazine-20716625> 17th December 2012

- To examine opportunities for improved partnership working together to ensure pest problems are addressed as efficiently and swiftly as possible; and
- To bring forward considered (and costed, where applicable) proposals to Cabinet for consideration.

WITNESSES

This review was undertaken over 4 meetings from January to April 2013 and the following witnesses presented evidence:

- Ed Shaylor - Community Safety and ASB Investigations Service Manager
- Paul Richards - Green Spaces, Sport and Leisure Service Manager
- Shabeg Nagra - Public Protection Service Manager
- Colin Russell - Waste Division Manager
- Chris Troy - Environmental Protection Unit Manager
- Colin Edards - Pest Control Contractor engaged by the Council
- Councillor Janet Gardner - Dawley Housing Group
- David Brough - Hayes Town Partnership
- Les Drussel - Ruislip Manor Chamber of Commerce
- Sinead Lee - Paradigm Housing Group

Background Information

TYPES OF PESTS

The dictionary definition of “pests” is that it is a general term for organisms which cause a nuisance, but more specifically may cause illness, damage or consume food crops and other material important to humans. Environmental Health Practitioners consider the following pests to be of Public Health significance:

- Rats/Mice (rodents);
- Cockroaches;
- Pigeons;
- Bedbugs; and
- Foxes (are technically not pests as they are wild animals).

The Prevention of Damage by Pests Act 1949 defines “infestation” as the presence of rats, mice, insects or mites in numbers which involve an immediate or potential risk of substantial loss or damage to food.

Further information on the following key issues can be found in **Appendix A**:

- The different types of pests, populations and likely infestation trends;
- The health implications of the pests listed above; and
- The problems pests cause to individuals, local neighbourhoods, commercial businesses and the wider environment.

RESPONSIBILITIES IN RELATION TO PESTS FOR ALL LOCAL AUTHORITIES

The principal legislation in place for dealing with pest control issues is:

- Environmental Protection Act 1990;
- Prevention of Damage by Pests Act 1949;
- Food Safety Act 1990;
- Health & Safety at Work Act etc 1974;
- Public Health Act 1936; and
- Housing Act 2004 (Houses in Multiple Occupation).

Tools for the enforcement of this legislation include: informal/warning letters; improvement notices; formal cautions; prosecutions; and the carrying out of works in default. Food premises with a pest infestation, which is an imminent risk to health, may be closed.

Local Authorities are not legally required to provide a pest control service, but the Prevention of Damage by Pests Act 1949 (PDPA) imposes a duty on a local authority to “take such steps as may be necessary to secure as far as practicable that their district is kept free from rats and mice” and, in particular, to keep the local authority’s own land (and land the local authority occupies) free from rats and mice. The PDPA also imposes a duty on local authorities to enforce the same duty on other owners and occupiers of land. It is worth noting that occupiers of land (except agricultural land) are required to give written notice to the local authority if it comes to their knowledge that rats or mice are present on the land in substantial numbers.

NATIONAL CONTEXT – STATUS OF PEST CONTROL WITHIN LOCAL AUTHORITIES

Historically, local authorities have generally provided pest control services. The focus of these services was to protect public health and had the advantage of being able to act strategically, rather than in a reactive, ad-hoc, property-by-property manner. This enabled them to react promptly and effectively to pest infestations that arose in the community. Services were not assessed on an individual's ability to pay.

As financial pressures on local authorities have increased, a review of the provision and identification of potential savings and income generation became important. This led to charges for pest control services being introduced in many cases, initially for nuisance pests (such as garden ants and wasps) but then extended more widely.

ENQUIRY

Based on this background information and the evidence provided by expert witnesses, the Committee was able to develop findings and recommendations that aimed to enhance waste management processes and thereby reduce pest populations. For ease of reference, evidence, findings and recommendations are set out below under the following sections:

1. Pest Service Provision (and its relationship to waste management)
2. Waste management processes and practices in Hillingdon and steps to mitigate any pest infestations;
3. Resident Engagement
4. Working in Partnership

APPENDICES

Appendix A – Information on pests:

- **problems caused**
- **possible health implications**
- **other factors**

Appendix B – Current pest provision and Enforcement

1. Pest Service Provision (and its relationship to waste management)

Current Pest Service Provision / Duty

During the course of the review, pest control services in Hillingdon were provided in the following ways:

- **Open Spaces** – Outsourced to Rentokil
- **Domestic Premises (rats and mice only)** – free service provided to Council tenants only. Variable fees and charges paid by other service users
- **Commercial Premises (food)** – Inspections conducted by the Council's Food Safety Team
- **Commercial Premises (non-food)** – Inspections conducted by the Residents Services Directorate – Anti-Social Behaviour Investigations Team
- **Commercial Premises (mixed)** – Inspections conducted by Residents Services Directorate

Further details on the remit of pest control services, the different types of environment in which they operate and enforcement options can be found in **Appendix B**.

Fees and Charges ³ and Changes to the pest control service from April 2013

Since April 2013, parts of the Pest Control Service have been outsourced to local contractors to cover the following services within one maintenance service:

- Hillingdon Housing Services tenants – free service
- Owner Occupiers where concessions apply – charge £15
- Residents in receipt of state pension (over age of 65 years) – free service
- Council buildings, Civic Centre, green spaces
- Concessions and residents aged over 65 are free of charge

The provision of Pest Control Services to owner occupiers or private tenants who do not qualify for concessions continues and they directed to local contractors if they wish to use such services.

Concessions and requests from those over 65 are dealt with by the Council's in-house team or private provider, but booked through the Council's contact centre which has improved the way the service responds to residents.

³ See Appendix B

RECOMMENDATIONS: Pest Control Services

That Cabinet:

- 6. notes the Committee's endorsement of a new, more equitable approach to providing Pest Control Services following the BID review and the current concessions policy, which includes a free pest control service for all over 65's, disabled and those on benefits.**
- 7. asks officers to ensure residents and landlords are aware of the services available from the Council to tackle pest problems, including an indication of costs. Cabinet also asks officers to encourage Registered Social Landlords to provide advice on the use of these services.**

2. Waste management processes and practices in Hillingdon and steps to mitigate any pest infestations

Hillingdon’s Waste Management Services - Overview

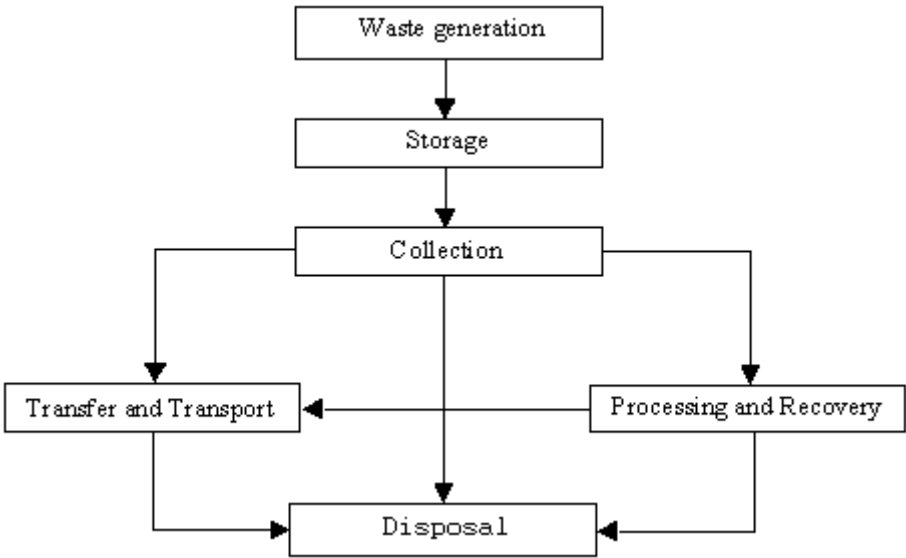
Commercial Waste

Waste Services rent waste collection bins to commercial premises and then collect trade waste from them under contract. This is a chargeable service with the authority duty bound to recover its costs.

Street Cleaning

The Street Cleaning Service collects dumped rubbish from roads and pavements, as well as green spaces and open spaces that the local authority has a duty to maintain. Officers are aware that there are a number of potential pest hotspots throughout the Borough, where private land (such as rear access roads) can attract fly-tipped rubbish which then often attracts pests. In some areas (and if there are extenuating circumstances), the Council adds private roads like this to street cleansing regimes, but is mindful that such action does not set a precedent which could expose the Council to a permanent arrangement and a considerable increase in costs. Unless the circumstances are unique, taking responsible action to clear waste can actually increase a problem as householders and fly-tippers become aware and may leave even more waste in the knowledge that it will be taken away at regular intervals.

A Flow Diagram illustrating Waste Management



Domestic Waste

Hillingdon operates three separate collection services to households across the Borough:

- Residual waste collection (black bags to landfill)
- Co-mingled recycling (paper, card, glass, plastic and tins)
- Garden waste (including vegetables peelings, etc)

Residual waste and co-mingled recycling are collected weekly. Garden waste is collected fortnightly.

Schedules are designed to ensure that the fortnightly collection of green waste coincides with the collection of other waste collections. In all circumstances, residents are required to:

- place bags out for collection in their front garden, drive or path, but not on the pavement or grass verge
- not place bags out for collection earlier than 17:30 on the evening before
- if collection is via rear service road, waste to be placed at a regular and at a convenient collection point
- at no time during the week, store refuse/recycling anywhere other than within the property boundary

The Committee was informed that a number of generic problems existed, irrespective of the type of tenure. These included:

- A lack of basic hygiene standards existed in some households whereby waste bins (especially food waste) were not being cleaned or emptied on a regular basis.
- Kitchen floors, walls and 'splash back' areas in kitchens / food preparation areas were not being systematically cleaned or even cleaned at all.
- Domestic waste was not being separated correctly between food and recyclable waste. This often meant that both types of waste were cross contaminated and residual food waste made both types of waste equally attractive to pests.
- Full domestic refuse sacks were not being stored in a secure environment which meant that odours made them attractive to foxes and / or domestic pets which scavenged, thereby opening the bags for other pests to gain access.
- Domestic refuse (food waste and recyclable) was being stored in a location which was not readily accessible to waste services. This meant that only some waste was collected on a regular basis. In some cases, if the waste was not immediately visible, this could be missed altogether causing a stockpile to develop given the time constraints and collection schedules of waste services to cover a given area in a specific amount of time.
- Domestic waste was being put on the pavement / alley way / access point or left at the agreed collection point well in advance of the Council guidance for household convenience. This meant that the waste would be exposed to the possibility of being opened and readily available to pests to either feed or breed in the waste.

- Households tended to overlook the potential problems created by green waste (given this could include damaged or rotting fruit) and often neglected how this was stored and managed in comparison to food waste.

The Committee heard that pest control services were provided free of charge to Council tenants. However, there was no discretion or allowance made for those residents housed by social landlords and experiencing social hardship and this was considered to be inequitable.

To improve waste management processes and reduce the scale of any pest problem, Council tenants were regularly reminded of their duty under their tenancy agreements to manage their waste as effectively as possible and that all occupiers were obliged to take reasonable steps to keep individual areas clean. In many cases, there was confusion by private tenants and tenants of social landlords about the specific terms of tenancy agreements and about which party was responsible for pest control and eradication. It should be noted that responsibility for the management of waste normally resides with the tenant. However, in most cases the landlord is responsible for ongoing maintenance to the property such as making good any holes in walls, cracked pipes or ensuring there is adequate provision for waste storage, all of which would be material factors in controlling the opportunities for pests to access an environment conducive to them increasing in number and / or accessing foodstuffs.

If pest control action is deemed to be necessary, notices can be served by the Council on owners and occupiers, thereby giving them 21 days to remove waste products (such as soft materials) or to set baiting to kill rats and mice. If this work is not undertaken, then the Council is obliged to take action under the umbrella of public health and undertake the work itself - the owners or occupiers will then be recharged for this work.

There are a number of leaflets available, including *Your guide to Waste & Recycling* and *Street Scene Enforcement Team Trade Waste* for businesses, which illustrate the types of information the Council is providing and the key messages that are being given out.

As well as the information and advice readily available at municipal buildings, leaflets are also posted to residents when it is established that there are specific problems, like an infestation problem in a particular area. If problems persist, pest issues are reported to the Anti-Social Behaviour Investigation Team (ASBIT) and are investigated by an inspector. The Committee was encouraged to learn that the ASBIT and Waste Division officers work closely together and both teams reinforce each others approach of taking preventative action and using inspectors where necessary, rather than pursuing prosecutions. In those areas where there is a quick turn around in occupancy, leaflet drops are mostly ineffective due to the frequent change in tenancy.

RECOMMENDATIONS: Domestic Housing

That Cabinet:

- 1. ask officers to request the support of the Hillingdon Registered Social Landlords Forum to encourage a provision for:
 - a. more uniform tenancy conditions to prevent pest infestation; and**
 - b. improved communications to support, educate, advise and guide their residents about handling waste through 'Welcome packs' or other introductory material.****
- 2. notes the roles of private landlords, social landlords and the Council (as a landlord) in terms of how pest infestations are dealt with effectively in tenanted properties; and work with these groups to ensure that all tenants are aware of best practice.**
- 3. asks officers to encourage social responsibility of individual tenants and homeowners, whether in social or private sector housing, to properly manage their domestic waste to minimise pest problems through:
 - a. educational materials and leaflets;**
 - b. the wider use of signage to re-enforce the necessity of effective pest control and waste management;**
 - c. articles in Hillingdon People twice a year to remind residents about effective ways of managing waste; and**
 - d. education through schools.****
- 4. endorses the Council's enforcement methods in the case of persistent offenders and individuals or groups who have been reminded of their responsibilities, endorses the Council's enforcement methods to ensure that domestic waste is managed properly.**
- 5. instructs officers to send the report to the National Landlords Association and other relevant bodies, representing private sector landlords for information and to promote a cohesive voluntary agreement among their members.**

Commercial Waste

Anyone who runs a business, regardless of size, is legally responsible for ensuring that the waste created is collected and disposed of correctly. This is called 'Duty of Care'. To comply with legal obligations under s.34 Environmental Protection Act 1990, businesses must ensure that:

- all waste is kept secure and safely until it is collected
- any person or company collecting waste is registered as a 'licensed waste carrier' by the Environment Agency
- Waste Transfer Notes provided by the licensed waste carrier are kept for two years as documented evidence that waste has been dealt with legally

The cost of collecting business waste is not included in Business Rates. Businesses can engage a private contractor who is a licensed waste carrier, or use the Council's competitively priced service.

The Council's service is run on a not-for-profit basis and any revenue generated is put back into Hillingdon waste services.

As part of the Council service, businesses are provided with the correct documents to comply with legal duties. They are also assured that they meet the Pre Treatment Regulations for commercial waste because the waste is collected as part of the municipal waste stream.

The Council inspects, through a team separate from the provision of Waste Services, any business which appears to be non-compliant with the Duty of Care. Often this is in response to complaints of the presence of smell or vermin. The most common offences are:

- insufficient receptacles for business waste – not enough or too small – leading to over-spilling and lids not closing, and rubbish being placed on top of or outside the receptacles
- mixing business waste with domestic waste to achieve free collection
- receptacles being stored in the wrong place
- waste being collected by un-licensed waste carriers – increasing the risk of fly-tipping – or no waste collection contract being in place
- no documentation of waste transfer or waste collection contract

All of these offences can be dealt with by the service of a legal notice requiring compliance (or the production of documents) and non-compliance can lead to a Fixed Penalty Notice or court prosecution. This does not prevent the use of alternative notices under the Prevention of Damage by Pests Act 1949.

Business waste contraventions are often described as being caused by third parties. For example, rubbish being placed into trade receptacles by unauthorised persons, domestic waste being mixed with trade waste or rubbish being littered or fly-tipped onto the site. However, Members are minded that businesses have a responsibility to keep their land clear and make sure their waste receptacles are not being misused.

RECOMMENDATIONS: Waste Services & Enforcement

That Cabinet:

- 8. supports the education and encouragement of businesses to take full responsibility for the cleanliness of the land they occupy, as well as to comply fully with the “Duty of Care for Waste Management”.**
- 9. supports the continuation of enforcement and alley gating schemes to be considered in areas where there is a high level of illegal dumping of waste. Both these methods are positive proven solutions to areas of the Borough with high pest infestation issues.**

Conclusions and proposed remedial actions

In conclusion, the Committee is proposing that the following measures could be taken to improve waste management and reduce the incidence of pests:

- Residents Associations should be encouraged to use newsletters to highlight best practice.
- Leaflets should be used to underline the relationship between good waste management and controlling pest numbers.
- Officers should be asked to use Hillingdon People (the Council newsletter) as a vehicle to highlight the need for continued vigilance and to include a page of universal ‘dos and don’ts’ to improve waste practices.
- That clarification be given to what the main categories of pests are and what the specific charges would be to address individual problems.
- That it be highlighted that Council services only address the treatment of rats and mice.
- The Council’s information, advice and guidance (this would include website information) on pests needs to be refreshed and should include specific information relating to bees and wasps.
- The Pest Control Association has suggested that the key way of addressing pests is through an educational approach, as problems usually stem from human behaviour. As such, preventative action is preferable to remedial action.
- That new signage incorporating pictures and simple language i.e. fly-tipping (does everyone understand what this phrase means) with a universal message be rolled out when leaflets and waste campaigns are refreshed.

3. Resident Engagement

The Committee strongly believes that the education of the whole community in safe and efficient waste handling and disposal is fundamental to the limitation of pests within the Borough. In the Committee's view, an important element in the success of initiatives is the promotion and communication of achievements and new initiatives to the widest audience. It is agreed that, for effective waste management and pest control to take place, residents, the business community, support organisations and other stakeholders need to be aware what initiatives, services and support exists.

Corporate Communications plays a valuable role in increasing public awareness and other stakeholder understanding of the different types of service provided by the Council as well as how to access those services which the Council might not provide. There are three principal means of doing this:

1. Core activities – including media relations, publications (such as Hillingdon People), corporate branding, marketing (leaflets, posters and displays) and digital media.
2. Consultation and engagement – to help the Council understand current residents' views, satisfaction levels and thinking on specific policy issues or services. Examples include the annual residents' survey or the recent consultation on changes to council tax benefits.
3. Campaigns – these are linked to key service priorities and range from fully integrated campaigns (which includes some or all of the above) to event-based or public information campaigns.

RECOMMENDATION: Resident Engagement

That Cabinet:

10. **instructs officers to ensure that, when leaflets and waste campaigns are refreshed, they promote a universal message.**

4. Working in Partnership

External Partners

At the Committee's final witness session, Members heard from representatives of the following partner organisations:

- David Brough – Chairman of Hayes Town Partnership
- Les Drussel – Chairman of Ruislip Manor Chamber of Commerce
- Councillor Janet Gardner – Chairman of Dawley Housing Co-operative
- Sinead Lee – Paradigm Housing Group

Pests - Urban Environments and New Development

During discussions about pests, their habitats and likely effects on health, the Committee heard how urban environments and, in particular, new developments could give rise to pest populations:

- Reducing the habitats for pests in rural environments and urban sprawl makes urban areas more susceptible to pests.
- Urban planners and developers often seek to integrate, visually and ecologically, construction projects, such as housing developments and recreational areas, with their natural surroundings. However, they often do so without considering the risk of increased pest infestation.
- Changes to building design aimed at meeting modern lifestyle and legal requirements have provided conditions more conducive to pest infestations. One example of this is the effect of humidity on house dust mites.
- Throughout the building industry (from legislative controls to design and construction), more emphasis needs to be placed on the means of providing adequate ventilation through suitable technology and improved window design.
- Simple maintenance failures, such as broken roof tiles, damaged water pipes and overflowing cisterns, along with common mistakes in design or construction (such as excessive use of impermeable membranes), can lead to excessive moisture in buildings which can attract pests.
- Correct storage of rubbish in closed bags or containers, particularly when waiting for collection, is essential in preventing rat and fly problems. Particular care should be taken with food waste.
- In gardens, water butts, ponds and water features may provide breeding sites for flying insects, such as midges and mosquitoes, especially when stagnant.

One of the witnesses suggested that, given the factors listed above, passive control through improved design and construction of urban sprawl and housing stock was the most sustainable approach. This could be addressed by introducing a condition which places the onus for pest eradication on developers.

It was also acknowledged that, at present, residents have to pay to address the problems of rats nesting in their gardens, which had been driven there because their original habitat had been disturbed or destroyed by building works. It was felt that residents should not have to bear the burden of developers who were causing the problem in their locality. Further measures included:

- Developers ensuring that, where land was contaminated with rats, the land was cleared of vermin before commencing building work.
- From April 2013, Public Health issues would be the responsibility of the Council and it would then be a case of making the developer aware.
- The most appropriate way of tackling development issues would be through the Building Act (1984) rather than through planning conditions, as the legislation enables quicker resolutions (for example in dealing with defective drainage) or Prevention of Damage by Pests Act 1949.
- The onus rested with the owner or occupier to engage pest control services, but if the rats were coming from another property, enforcement action could be taken against that property.

Costs / Usage of the Pest Control Service and Local Partnerships

The Committee endorsed the preventative approach being taken in Hayes Town which was currently through the dual approach of community education and enforcement action. This approach centred around raising the profile of a cleaner and greener Hayes through the Hayes Project and was working in collaboration with the Hayes Community Engagement Group.

The project also involved working with Botwell House, Dr Triplets School and Minet Junior School to raise awareness amongst children by actively engaging them by getting them to conduct surveys of bags and litter left in the streets. In addition, a poster was produced showing the children and the slogan "Hayes school children say make Hayes Town cleaner and greener – Help keep our Town clean". Litter collection is also undertaken with the 3 schools. These types of initiatives have impacted on local traders as they have been asked to participate by displaying anti-litter posters in their shop windows.

There is clear evidence that these activities work and promote a change in attitudinal behaviour, which is one of the most powerful ways of reducing a pest problem. The use of workshops is another idea which has seen traction in Hayes to improve poor food hygiene and encourage compliance with regulations. In this regard, the Hayes Town Business Forum has offered to work with the Council to set up similar workshops elsewhere so positive messages can be disseminated Borough wide.

Tenants living above shops and issues arising

The Committee's attention was drawn to the challenging problem of people living above shops - the high turnover of renting in some areas of the Borough means that effective enforcement is often difficult. With regard to putting rubbish out on the wrong day and causing infestation, the legislation could be amended so that private

landlords are regarded as businesses. This could then be used to encourage them to ensure that their tenants properly manage their waste.

It has been suggested that one of the most successful ways of addressing these problems is through the widespread use of pictorial messages. The Council could explore the possibility of using a sponsor to produce a calendar which could be placed in commercial kitchens, providing information about waste and recycling.

Social Housing / Enforcement and Remedies

The Committee was assured that Paradigm Housing took active steps to address any breaches to tenancy agreements. However, as with many other organisations, Paradigm Housing also had to deal with issues of stretched resources.

The Committee suggested that Social Landlords should be encouraged to take the following steps:

- Provide refuse containers for better waste management.
- A more rigorous approach to enforcing tenancy agreements.
- When designing buildings, to take account of accessible refuse storage for occupants.
- Planting schemes that do not encourage harbourage for rodents.
- Provide locking refuse bins, which would assist in easier identification of residents living in flats in regard to anti-social behaviour.
- Undertake inspections and enforcement against tenants who do not manage their waste properly.
- Where there is a high turnover of tenants, provide a welcome pack to include information about refuse, Council Services and public health issues; tenants should be required to sign to confirm their responsibilities prior to being given the keys to their homes.
- Ensure that there is a clear procedure for reporting any pest issues.

Thames Water

In 2000, Water UK issued a protocol providing a mechanism for improved communication and co-ordination between local authorities and sewage undertakers on the control of rats in sewers. The protocol called for co-operation on rodent control and for sewer baiting and surface treatments to be undertaken in a complementary manner and in agreement with all relevant agencies. The Chartered Institute of Environmental Health (CIEH) supported the National Protocol and continues to work with DEFRA and Water UK to improve its profile nationwide.

The aim of the London Sewer Rat Baiting and Treatment Protocol is to clarify and support improved communications between all the relevant agencies and set in place a system of developing appropriate and agreed plans for treatment, remediation and prevention of rat infestations.

Perceived Major Pests

Rats

- Are the most common pests in homes and businesses.
- They are widely found in urban and rural areas including homes, gardens, sheds and garages.
- Also commonly found living in sewer systems. This is particularly an issue where drainage systems are not in use and not blocked off.

Problems caused by rats

Rats can transmit many diseases to humans including:

1. salmonellosis (food poisoning)
 2. typhus
 3. trichinosis
 4. jaundice (Weils disease).
- Rats will eat or contaminate food intended for humans and can cause damage to buildings and other structures by gnawing and burrowing.

Alleviation

- Rats are difficult to eradicate once an infestation takes place in a property. Pest control officers would normally survey the infestation and then place poison bait in the most appropriate locations. Follow up visits are made in order to ensure the success of the treatment.

Cockroaches

- Usually live inside buildings and thrive around the heating ducts and boiler rooms of large centrally heated buildings, e.g., hospitals, bakeries, hotel and restaurant kitchens, laundries and blocks of flats. They congregate around pipes, stoves and sinks, especially in humid areas.

Problems caused by cockroaches

1. They eat any sort of food and contaminate food and food utensils, or food preparation surfaces as they move.
2. They taint food with an obnoxious smell and may be carriers of various diseases, including serious food poisoning.

Alleviation

- Control of cockroaches is seldom easy because of the difficulty of getting the insecticide to the insect. They are usually treated by an aerosol based insecticide.

Pigeons

- These are located in town centres where they have adapted well to the artificial cliffs of buildings.

Problems caused by Pigeons

1. The fouling of buildings and monuments. Acidic droppings react with chemicals in the stonework causing erosion of the surfaces.
2. Accumulations of droppings can become infested with mites and insects.
3. Fouling can block gutters and downpipes, causing water damage through seepage coming into the property; and block chimneys, causing smoke problems or gasses such as carbon monoxide being forced back into the house.
4. Accumulations of droppings pose a risk to health and safety causing slip hazards.
5. Large numbers of roosting pigeons can give rise to odour and noise complaints.
6. Pigeons carry many diseases including:
 - a. chlamydosis
 - b. cryptococcosis
 - c. campylobacter
 - d. salmonellosis
 - e. erysipelas allergic alveolitis (pigeon faextrinsic ancier's lung)

Alleviation

- The only effective way to control pigeons and other pest species of birds is to remove food sources, roosting sites and breeding sites.

Foxes

Controlling urban foxes is difficult, expensive and not very successful. Foxes have been in urban areas for so long that they have reached a state of equilibrium and they regulate the size of their own population.

Problems caused by foxes

1. Noise – stemming from fights over territory and mating.
2. Fouling of gardens.
3. They can be carriers of disease.

Alleviation

- Urban fox control is both difficult and very expensive. Shooting is not acceptable in urban areas, nor is snaring and so only live trapping is left. This is not usually very effective.

Bedbugs

- Bedbugs are a new threat to the community - they feed on human blood at night.
- They live in mattresses, within bed frames, under bed bases, within bed headboards, behind loose wallpaper, within paintings, wall sockets, telephones, behind wall partitioning, suspended ceilings, skirting boards, on clothing or furnishings, and anywhere with a dark crack/crevice/seam providing harbourage.

- They can be detected through: blood spotting on bedding; brown excrement spots close to where they live and on bedding; whitish/opaque un-hatched and hatched eggs; and a sweet almond smell is common.
- Bedbugs are not normally seen during the day.

Problems caused by bedbugs

1. Bedbugs are not known to carry disease.
2. Some people are particularly sensitive to the bites and experience an allergy and inflammation, especially to the arms and shoulders.

Alleviation

- Infested bedding and furnishings should be laundered in a hot wash and care should be taken not to aid dispersal of the infestation via laundry baskets.
- In severe cases, items of furniture will require removal and burning.
- Treatment consists of the application of an insecticide, usually in a spray form, in and around the infested areas.

An A to Z of pests can be found on the British Pest Control Association website at the following link:

http://www.bpca.org.uk/pages/index.cfm?page_id=15&title=a_to_z_of_pests

The problems pests cause to individuals, local neighbourhoods, commercial businesses and the wider environment:

- Pests cause damage to structures and contaminate products. Rodent activity is a nuisance and, at worst, can lead to fires and floods. Bird fouling can make pavements unsafe and result in significant claims for damages. Food and medical supplies are rendered unfit for sale or unusable when contaminated by either insect or rodent pests.
- Pest infestations make urban areas undesirable and inhibit inward investment. They tend to be part of a vicious circle - poor housing, health and education together with social exclusion; low business investment and high unemployment are common in areas where chronic pest infestations persist. Existing businesses may struggle to survive, finding the environment both unattractive and uneconomic and so may cease trading. Empty properties can become targets for fly-tippers and vandals.

The effect of temperature, climate, urban development and underground infrastructure (and any other factors) on pest populations:

- Temperature - Climate and weather can substantially influence the development and distribution of insects. Insects are cold-blooded organisms and hence the temperature of their bodies is approximately the same as that of the environment. Therefore, temperature is probably the single most important environmental factor influencing insect behavior, distribution, development, survival and reproduction.

- In the case of birds, temperature as a single factor does affect bird behaviour. A freeze kills much of the vegetation and the insects that many northern birds need. The loss of reliable food sources without a change in the photoperiod could cause some birds to migrate.
- Climate – According to the Chartered Institute of Public Health, the current trend for warmer, wetter weather, higher sea levels and more extreme weather events such as flooding will become more frequent. This in turn will lead to increased pest populations and greater interaction with humans.
- Urban Development – Provide ready supplies of food, water, shelter and sources of warmth which assist pests to propagate.
- Underground Infrastructure – Pipe works carrying electricity, gas, water and sewage provide conduits for pests to traverse urban environments.

Current pest provision – prior to April 2013

Current Service Provision (Open Spaces)

In Green Spaces and Golf Courses, the Council uses Rentokil to undertake surveys and provide control measures for rats in parks and mice in buildings.

The Council has also been using a local pest controller to assist with moles in fine turf. There is also an issue with foxes on the golf courses as both the number of foxes and damage caused by them is increasing.

Current Service Provision (Domestic Premises)

London Borough of Hillingdon Residents Services Directorate provides a pest control service for rats (and mice internal to properties only). The Council has landlord responsibility for Hillingdon Housing Services tenants and a free service is provided to them. In April 2011, however, fees were introduced for non-Council tenants and owner occupiers resulting in a reduction in demand for the service. Consequently, the in-house pest control service has assumed pest control work around the Civic Centre and the Council tenant service from Hillingdon Housing Services.

Callers can book appointments and make payment either by telephone or on-line on the Council website. Information and advice on the website for pest control was updated in the summer of 2012.

The charges for the service can be categorised as follows:

- Resident Owner Occupiers where no concessions apply - £60 for x 3 visits
- Resident Owner Occupiers where concessions apply, i.e., in receipt of benefits - £15 for x 3 visits
- Any additional visit or initial visit - £36 or £15 where concessions apply
- Private Landlords (rented houses) - £93.60 for x 3 visits
- Hillingdon Housing Services tenant's request – no charge
- Council Buildings – Civic Centre requirements, Green spaces and any Council buildings – internally re-charged at cost
- Concessions and over 65's - no charge

Current Service Provision (Commercial Premises)

The Residents Services Directorate's Food Safety Team carries out an inspection programme of food business, dealing with structural, operational and hygiene requirements. The inspection considers the layout and design of the food business concerned to ensure good food hygiene practices including protection against contamination and, in particular, pest control. Inspections cover provisions for storage and disposal of food waste, non-edible by-products and other refuse. The

officer will consider the design and management of refuse stores so as to ensure that they may be kept clean and free from animals and pests. Hygiene Improvement Notices may be served on the food business operator where there is a record of continued non-compliance.

Other provisions in relation to the cleanliness of the workplace and facilities for rest and eating meals, etc, extend to non-food business. These controls may be applied through the Health and Safety at Work Act and associated workplace health, safety and welfare regulations.

The Hygiene Improvement Notice does not deal with accumulations of rubbish or harbourage of pests in non food related locations. Non-food establishments are inspected in response to reports by the Residents Services Directorate's Anti Social Behaviour Investigations Team. On the first inspection, advice will be given by the officer to the trader to make sure they are aware of their responsibilities, with particular effort made to assist small traders to be aware of the steps they must take to manage waste.

If advice is not effective in resolving the problem, consideration will be given to serving a Legal Notice (see above) on the person responsible and or the owner of the land. With regard to commercial waste the following additional provisions apply:

- Environmental Protection Act 1990
 - S.47 requirement to store trade refuse in a suitable container
 - S.34 duty of care for persons responsible for waste to take all measures applicable to prevent any contravention by any other person of law and to ensure that transfer of waste is only to a person authorised for transport purposes
 - Regulations under s.34 relating to the requirement to have in place a waste management plan and, if necessary, a contract with a provider of waste removal and transfer services

Current Service Provision (Mixed Premises)

There are often occasions where more than one type of premises or land is affected by rodent activity. Examples might include:

- a parade of trading premises
- private flats above
- yards that form part of those premises to the rear
- yards that abut an un-adopted service road and the service road backs onto public open space
- flats that gain access via a staircase from the service road to balconies

Due to poor waste management by traders and residents, accumulations of both trade and domestic waste build up giving a food source for rodents that are seen to have habitat in the public open space.

In such situations officers break down the various elements that have combined - these being:

- Pest control action (i.e., baiting and poisoning) in the public open space. There are no enforcement actions to be taken as the open space is owned by the Council.
- Investigation of whether the trading premises is meeting its waste management and property ownership duties. Officers will conduct inspections of trading premises where waste must be securely contained, normally using bulk waste bins that have secure lockable lids. These bins should be regularly emptied by a registered waste collection company who will ensure correct disposal. This process must be recorded and audited. Should the officer find any failing in this duty, enforcement action will be instigated under Environmental Protection Act 1990 s34. Owners or occupiers have a requirement to keep land clean, tidy and sanitary, or formal actions will be taken to enforce clearance of accumulations and treatment for any rodents upon the land under Prevention of Damage by Pests Act 1949 s4. In cases where an un-adopted service road is not kept clear of waste, occupiers of premises that directly abut the service road will be served a notice to clear it under Public Health Act 1936 s78.
- Whether the residents of the flats have sufficient knowledge about how their waste should be stored prior to collection and when and where their waste should be presented for collection. Residents of flats will be visited to ensure that they are fully aware where domestic waste should be stored and that residents are aware of the collection day. Each flat will be given a guidance leaflet confirming the correct practice. Should there be continuing failure to store or present domestic waste in the agreed manner, notice can be served to formalise storage and presentation for collection under Environmental Protection Act 1990 s46.

Costs to the Council of providing the Pest Control Service

Cost	2011/2012	£113,000
Income	2011/2012	£76,000 (£36,000 external income and £40,000 recharges from other Council departments)
Net Cost	2011/2012	£37,000

Enforcement of the duties of occupiers of land

Properties are inspected by the Residents Services Directorate's Anti Social Behaviour Investigations Team in response to reports, as it is deemed that not dealing properly, either deliberately or negligently, with waste accumulations, or build up of undergrowth providing food or shelter for rodents is anti-social by nature as it is likely to cause nuisance for other people or a health risk.

On the first inspection, advice will be given by the officer to the occupier to make sure they are aware of their responsibilities, with particular effort made to assist older or vulnerable residents to be aware of the steps they must take to manage their property, or how to seek assistance if they cannot manage it themselves.

If advice is not effective in resolving the problem, consideration will be given to serving a Legal Notice on the occupier and / or owner under one of the following provisions:

- Environmental Protection Act 1990
 - S.46 requirement to present refuse in a prescribed manner
 - S.59 requirement to remove waste stored or deposited on land not licensed for such
 - S.80 requirement to abate a statutory nuisance connected to land in such a state as to be prejudicial to health or a nuisance
 - S.92 requirement to remove litter from land where it is detrimental to the amenity of the area
- Prevention of Damage by Pests Act 1949
 - S.4 requirement to remove or prevent conditions which provide harbourage for rodents
- Public Health Act 1961
 - S.34 requirement to remove waste from land which is seriously detrimental to the amenities of the neighbourhood
- Public Health Act 1936
 - S.78 requirement to sweep or cleanse passages or yards
 - S.79 requirement to remove noxious matter from land
 - S.83 requirement to cleanse filthy and verminous premises
- Town and Country Planning Act 1990
 - S.215 requirement to remedy the condition of land which is seriously adverse to the amenities of an area

If these notices are not complied with, there are various penalties set out in legislation and, in most cases, the Council will carry out the necessary work (“work in default”) and charge the cost to the person responsible.