

SWP Business Plan 2023 – 2028

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About Somerset Waste Partnership

Our vision and values

| Who we | Somerset's Local Authorities working together as the Somerset Waste |
|---------|--|
| are: | Partnership, ensuring that our household waste is reduced, collected, |
| G. G. | reused, recycled and effectively treated. |
| | |
| | Preserve our environment by making every effort to ensure our |
| What we | household waste is not wasted but reused as a valuable resource. |
| do: | Deliver excellent customer service and value for money to create a |
| | more sustainable Somerset. |
| What we | An exemplar for how we manage waste as a resource, work with |
| want to | others and support our residents to manage their household waste |
| become: | and make our service the best it can be. |
| | Insight: Working with our partners to understand how and why people |
| | behave as they do and use this knowledge to shape our service. |
| | Collaboration: Treating everyone we work with as an equal, knowing |
| Our | we have greater success when we work together. |
| values: | Innovation: Learning from others and constantly looking at new ways |
| | of working to give the best service we can. |
| | Quality: Focusing on excellent customer service and making the best use of the waste we collect. |
| L | |

Background to SWP

Somerset Waste Partnership (SWP) was established in 2007 and manages waste services on behalf of Mendip, Sedgemoor, Somerset West and Taunton, South Somerset District Councils, and Somerset County Council. This made it the first county-wide waste partnership in the country. It has a history of innovation – the first to roll out food waste at scale, the first to publish an annual report showing exactly what happens to all its recycling and is known for its commitment to collecting quality source separated recycling materials which are used as resources by UK industry.

SWP is accountable to the Somerset Waste Board (SWB), which consists of two members from each of the partner authorities. For further information about Somerset Waste Partnership and the Somerset Waste Board visit www.somersetwaste.gov.uk.

SWP has delegated authority to deliver household waste and recycling services throughout Somerset, including management of kerbside collections, recycling sites and disposal sites. SWP contracts out these services to SUEZ (Collections), Viridor (Energy from Waste and transfer stations) and Biffa (Household Waste Recycling Centres, composting and food Anaerobic Digestor). There is significant corporate change in the waste sector affecting all three of our contractors.

In April 2023 the five existing councils in Somerset will be replaced by a new single unitary authority – Somerset Council. This Business Plan highlights the work after this date to exploit the opportunities this creates, noting that SWP has operated as a virtual unitary for many years. The Business Plan is in alignment with priorities identified in the new Somerset Council Plan.

Key Challenges and Opportunities

| | Geopolitical impacts: The conflict in Ukraine and the ongoing impact of Brexit is |
|---------------|--|
| | likely to continue to have indirect impacts on SWP |
| | National legislative change: The Government has still not finalised its approach |
| | on DIY waste charging and collection consistency – but these are expected this |
| Ca | year. It has clarified its approach on Extended Producer Responsibility and we |
| Political | expect this to deliver a multi-million pound benefit to Somerset from 2024/25, |
| Po | but the detail is still being developed so we cannot be certain or quantify this. |
| | Early in 2023 Government confirmed that a Deposit Return Schemes will be |
| | introduced for steel and plastic beverage containers. |
| | Future of Local Government in Somerset: The transformation required after |
| | vesting date creates opportunities but also risks, especially in relation to capacity. |
| | Financial pressure: The financial environment challenges on local authorities are |
| | extremely acute, especially with inflation running at very high levels. These |
| | pressures also create significant commercial pressures on our contractors. |
| | National Driver shortage: The national challenges are unlikely to go away |
| .⊇ | overnight and there is a real risk of pay inflation and further future shortages. |
| Economic | Recyclate risk: SWP share risk with its collection contractor on recyclate value. |
| O | This will directly impact upon the SW:EEP fund and hence the money we have to |
| R | |
| | drive behavioural change. A global recession presents an income risk. |
| | Cost of living crisis/recession: The national economic outlook is gloomy. This |
| | may result in lower consumption, but we cannot be certain how the changes in |
| | behaviour will impact upon us. |
| | Demographic changes: Somerset's growing and ageing population inform our |
| | planning for the future. Somerset has historically benefited from near full |
| Social | employment, which makes recruitment more challenging. |
| Şõ | Aftermath of Covid-19: We are not yet clear which changes will be permanent |
| | and what will revert back more to pre-pandemic conditions e.g. how much home |
| | working will remain the norm and what will this do to waste generated at home. |
| | Social media: Increasing use of social media presents an opportunity to reach |
| Technological | more people but raises expectations about speed of response. |
| ogi | Big data: The ability to manipulate large data sets (be it around people's |
| <u> </u> | behaviour or the life cycle of resources and waste) can be powerful. |
| L | New materials: New materials may emerge onto the market quicker than our |
| Te | ability to manage them at the end of their life. |
| | Somerset's Climate and Ecological Emergency: This remains at the heart of |
| l | what SWP is here to do and what motivates all our staff. However, our ability to |
| ıta | implement change will be constrained by resources. |
| Environmental | Public Awareness: Many people are much more aware of climate change and |
| n | keen to do more, and frustrated if they feel they cannot do more. We need to |
| i. | |
| <u> </u> | continue to do all we can to ensure people know what happens to their recycling |
| Ш | and hence builds trust. |

Approach to Business Plan

As per the requirement in the constitution, our Business Plan explains how we will work towards our Vision over the next five years, with a particular focus on next year. With the creation of a new Unitary Authority in April 2023 this will be the last year of an SWP Business Plan to be delivered through the Board. When guidance is issued on Business Planning approaches for the new Council this plan will be revised.

SWP remain focussed on three outcomes as last year, beneath which sit a range of inter-linked activities structured into themes. This year's plan is an evolution rather than a revolution but we will be particularly focussed on:

- **Supporting people to reduce waste**, especially food waste given that this contributes to people coping with the cost of living crisis as well as supporting our environmental agenda.
- **Focussing on reuse**, including launching Community Action Groups and exploring how we can promote much more reuse at our recycling centres, potentially involving more reuse shops.
- Increasing recycling including by adding in additional materials at the kerbside and HWRCs, noting that this will be subject to the availability of funding.
- Continuing to focus on improving service quality following the disruption over the last few years, for example due to Covid and the National Driver Shortage
- Realising the potential benefits of being part of Somerset Council
- Playing our part in helping Somerset Council meet its extreme financial challenges

| | Theme | Delivering | Changing | Tackling climate |
|-----|------------------------|--------------------|---------------|--------------------------|
| | | excellent services | behaviours | change |
| | | SWP effectively | People manage | SWP maximises its |
| | | collects, recycles | waste as a | contribution to tackling |
| | | and treats waste | resource | the climate emergency |
| 1. | Waste reduction | | | |
| 2. | Promoting Reuse | | | |
| 3. | Increasing Recycling | | | |
| 4. | Decarbonising residual | | | |
| | waste | | | |
| 5 | Decarbonising our | | | |
| | operations | | | |
| 6. | Tackling non- | | | |
| | household waste | | | |
| 7. | Working with others | | | |
| 8. | Improving the | | | |
| | customer experience | | | |
| 9. | Supporting wider | | | |
| | goals in Somerset | | | |
| 10. | Enabling activities | | | |

1. Waste Reduction

In accordance with the waste hierarchy, reducing the amount of waste we generate in the first place is the best environmental outcome and delivers savings to the Council & residents. c70% of food waste was avoidable and it is one of the most carbon intensive items in our waste.

| Wha | nt | When | Why |
|---------------------|--------------------|---------|---|
| 1.1 | Food strategy | Ongoing | We will seek to work with partners to develop a food strategy for Somerset (to avoid food |
| | | | becoming waste in the first place) whilst looking at the whole system from production, |
| | | | consumption, environment, food poverty and health. |
| 1.2 | Joint work with | 2023/24 | Explore joint work with food banks and pantries to support waste reduction, recognising the |
| | food banks | | benefit this can have in supporting people through the cost of living crisis. |
| 1.3 | Online map of zero | 2023/24 | Building on SWP's crowd-sourced listing of zero/minimal waste shops across Somerset will |
| | waste shops | | launch an online map (on the new Somerset Council website) that helps identify these shops. |
| 1.4 | Reviews: reusable | Ongoing | Review effectiveness of support provided to nappy library groups (funding for loan kits) and for |
| | nappies and refill | | the Refill Campaign and potentially revise approach. |
| 1.5 | Waste prevention | Ongoing | SWP now has an annual 'reduce' week in addition to embedding this in our seasonal |
| | campaigns | | campaigns (e.g. in the run up to Christmas) and seeking to support the cost of living crisis. |
| How will we measure | | | usehold arisings is the key measure of waste reduction, as well as updating on specific projects. |
| success? | | Waste c | omposition analysis will help us understand what Somerset residents are throwing away and |
| | | hence m | nay inform future priorities. |

2. Promoting reuse

Reusing things that would otherwise become waste is better for the environment than recycling them. Across Somerset there is a vibrant network of organisations that deliver great social outcomes (be it tackling isolation, reskilling those far from the labour market, supporting refugees) as well as environmental ones, and SWP wants to explore how it can best work with that network.

| Wha | What | | Why |
|-----|----------------------------|--------------------|--|
| 2.1 | Reuse at recycling centres | 2023/24 onwards | Full review of how we handle and promote reuse, including the viability of additional reuse shops at Recycling Sites, working closely with Biffa, our new HWRC contractor and learning |
| | | | from good practice elsewhere. |
| 2.2 | Community Action | 2023/24 | Having agreed SWEEP funding we will launch a network which supports reuse groups to |
| | Group | onwards | sustain and grow (helping reuse groups work more efficiently, collaborate better, strengthen |
| | | | community cohesion, facilitate skills share and maximise existing assets), building on |
| | | | successful approaches in other authorities and supported by Resource Futures. |

| 2.3 | Fixy McFixface | Ongoing | Following expiry of funding in in 2021/22 SWP will review how we can continue with Fixy, |
|-----------------------------|-----------------|----------|---|
| | | | aligning it with our emerging approach on Community Action Groups. |
| 2.4 | Reuse campaigns | Ongoing | Reuse week is now part of SWP's annual calendar of events. |
| 2.5 | Bulky waste | 2023/24 | Develop proposals to divert bulky waste collection to reuse |
| | diversion | | |
| How will we measure We will | | We will | seek to learn from emerging best practice which seeks not only to report on tonnage of reuse, but |
| success? items re | | items re | used and economic value achieved. |

3. Increasing recycling
When waste can't be avoided or reused, the best thing that can happen to it is that it is recycled properly. SWP is committed to

| colle | collecting quality recyclate– with c.97% currently staying in the UK. | | |
|-------|---|-------------------------------------|---|
| What | | When | Why |
| 3.1 | Pilot soft plastic collection | 2023/24 onwards | We will trial the collection of soft/flexible plastic (e.g., bread bags, carrier bags, the film on punnets/ready meals) at the kerbside. A very small pilot (c.3500 properties) will take place in 2023, expanding to a larger pilot in 2024/25. The results of these pilots will feed into how these materials can be added to collections for all in future. This trial is fully funded and part of a national programme. |
| 3.2 | Recycle even more at our HWRCs | Ongoing | Exploring whether we can accept further 'hard to treat' materials at our recycling centres, including mattresses, hard plastics, UPVC window frames. If funding allows we will seek to improve our recycling centres (Minehead and Frome being particular priorities). |
| 3.3 | Food waste in communal properties | 2024/25 | Through Recycle More many communal properties accessed our kerbside food recycling and we will continue to offer this. We will aim to ensure all communal properties have access to food recycling though this will be dependent upon future national policy and funding. |
| 3.4 | Recycling A-Z guide | 2023/24 | A comprehensive, up to date and user-friendly guide will help people understand all their reuse and recycling options in Somerset – not just through the Council collections/HWRCs, but through shops/supermarkets, Terracycle schemes etc. |
| 3.5 | Targeted campaigns | Ongoing | Campaigns targeted at key peaks in waste in addition to Recycle Week as one of our 4 awareness weeks. |
| | v will we measure cess? | ProgAnnı | dline recycling rate (both kerbside and recycling centres) ress on individual projects reported via the quarterly board report ual tracker showing what happens to our recycling on measurement of recycling and using that (not weight) to prioritise |

4. Decarbonising our operations

What we do (i.e., recycling, encouraging reuse and reduction) is a much more significant impact on our carbon footprint than how we do it, but it is still crucial for us to continuously improve in this area, including our fleet and how we decarbonise black bag waste.

| uo it | do it, but it is still clucial for us to continuously improve in this area, including our neet and now we decarbonise black bag waste. | | |
|-------|--|--------------------------|--|
| Wha | nt | When | Why |
| 4.1 | Decarbonising Energy from Waste | Ongoing | SWP will continue to work closely with Viridor to develop the pilot project to extract plastic from black bag waste, encourage the full use of heat – should Avonmouth be able to operate as a combined heat and power facility, dependent on the provision of a local heat network requiring support from Bristol City Council, it will be even more environmentally efficient. SWP will continue to work closely with Viridor to ensure that Avonmouth sees carbon capture and storage installed at the earliest viable point. |
| 4.2 | Pilot alternative fuels in our fleet | Ongoing | Learning from the 2022/23 trials of Hydrogenated Vegetable Oil in our fleet, the additional costs required, and ongoing reviews into the sourcing of HVO (and hence its true environmental benefit) SWP is awaiting further evidence on the risks/benefits of using HVO in the fleet before a decision can be made whether to use it in the fleet. As other potential technologies appear viable (e.g. hydrogen) we will explore them. |
| 4.3 | Exploring electrifying our fleet | Ongoing | Continue to pilot electric and other decarbonised fleet and learn from the e-RCV used in Somerset. Further electric fleet will depend upon the availability of funding. Work with our contractor to move small vans to electric vehicles (including working with them to enable onstreet charging where necessary). |
| 4.4 | Depot green infrastructure | 2023/24 | Subject to finalisation of contractual issues and a review of the business case, Photovoltaic panels will be installed at our Evercreech and Walford Cross depots – the high and stable use of electricity at the sorting and baling facilities make them particularly suitable. Business cases for further green infrastructure will be developed. |
| 4.5 | Reduce carbon intensity of fleet | Ongoing | Technology onboard our new fleet (CMS Supatrak) will enable monitoring of driving (harsh braking/acceleration, idling), and Suez will utilise this to improve driver behaviour. |
| | will we measure cess? | SWP reports from or oper | s on key projects and involvement in Council wide work to better map all carbon emissions ations. |

5. Tackling non-household waste

Whilst not part of our statutory responsibilities, as part of our work on the climate emergency we have identified ways in which we can help businesses and other non-household waste producers in Somerset reduce their environmental impact.

| Wha | nt | When | Why |
|------------------------------|---|-----------|---|
| 5.1 | Support Schools to recycle even more | 2023/24 | Review the effectiveness of the transition to Recycle More for schools, analyse individual school performance to identify opportunities for further improvement, including a review of pricing and operating model (working with Support Services for Education) so that we transition to a fuller 'producer pays' principle and incentivise behaviour change. |
| 5.2 | Public sector estate waste: shaping the market | 2023/24 | In 2019/20 SWP developed a business case which demonstrated the financial savings and environmental benefits from a coordinated approach to waste collection across the County Council and district partners – aligning that service more with the household service (i.e., a broader range of recycling and greater separation). As the Somerset authorities become a unitary authority this project has been transferred to the 'Assets and ICT' workstream, though SWP will still support and seek to expand to cover more public sector partners in Somerset. |
| 5.3 | Collaborative procurement | tbc | Potentially pilot collaborative procurement for recycling and waste in one or more of Somerset's market towns – reducing costs for businesses, improving environmental outcomes and aligning with local needs |
| 5.4 | Green Business Support | 2022/23 | Through our work on the joint Climate Emergency SWP developed a proposal for green business support – providing business with trusted guidance and support to reduce their carbon emissions and become more resource efficient and circular. This is now being led by Economic Development team (with SWP supporting)and together we were successful in securing funding for a pilot project. |
| 5.5 | Helping business respond to national legislation | Ongoing | Consider the potential changes to legislation for business waste recycling around DRS, EPR, business waste recycling (inc. food) and how SWP can work in partnership with others to shape Somerset to be an exemplar for household-like recycling from businesses. Timing will depend upon the Government confirming final policy and timescales. SCC and SWP are working with WRAP to pilot new tools aimed at increasing Business Recycling in early 2023. This pilot will also help inform the Green Business Support programme. |
| How will we measure success? | | SWP repoi | ts on projects at key milestones |

6. Working with othersPartnership is at the heart of what SWP do – how we work with our contractors/wider workforce, the public and other parts of the nublic sector

| | Publi | public sector. | | |
|------|-------|-----------------|---------|---|
| What | | When | Why | |
| | 6.1 | Local Community | Ongoing | In addition to regularly attending meetings explore how we can be more accountable to Local |

| | Networks & Parish Councils | | Community Networks and work with them to improve waste reduction, reuse and recycling. |
|------------------------------|--|---------|---|
| 6.2 | Local Engagement Programme | 2023/24 | Work with SUEZ to understand how they will deliver on their social value commitment to deliver 100 activities and interventions per year in deprived and poor recycling areas (Local Engagement Programme) |
| 6.3 | Working with young people | Ongoing | Our Schools Against Waste programme highlights waste reduction, as does the successfully piloted Eco Schools grant funding. We will review both to seek to increase their impact subject to availability of funding. |
| 6.4 | Embed recycling in planning system | Ongoing | Embedding our refreshed Developer's Guidance in local plans/unitary planning policies. Engagement on planning applications and working with planners, developers and their agents will be critical to ensuring every home (especially flats) are built with recycling in mind. |
| 6.5 | Developing partnerships & engagement with front-line staff | Ongoing | With limited resources, we need to develop strong partnerships, especially with third sector organisations, in order to ensure that we cost-effectively drive people to change behaviours. Our people are our most important asset and act as our ambassadors. Working closely with Suez and Biffa it is important that SWP engages closely with our frontline staff. |
| How will we measure success? | | SWP re | ports to the board at key milestones |

7. Improving the customer experience

Delivering excellent customer service is a critical part of our vision. The scale and complexity of this is significant, with multiple complex systems interacting between contractors, SWP and partner authorities – over 100,000 customer contacts each year and over 18,000 followers on Facebook.

| 0101 | Over 10,000 followers out 1 doesbook. | | |
|------|---|---------|---|
| Wha | What | | Why |
| 7.1 | Increasing our reach, including through the new website | Ongoing | As part of moving to Somerset Council we will cease to have a separate website and use this opportunity to refresh our web presence. We will maintain a separate social media presence and continue to explore innovation (e.g. extending use of the Chatbot successfully used in later roll-outs of Recycle More) as well as incremental improvements (improving the functionality of the online calendar) and the further use of new channels such as Nextdoor. |
| 7.2 | Customer Relationship Management System Review | 2024/25 | To support a smooth transition to the new unitary SWP have extended their Customer Relationship Management (CRM) system - My Waste Services - contract from September 2021 on 2 + 1 + 1 year basis (with early termination ability). Working with the customer service team in the new council we will review our future system needs to cope with c.100,000 annual contacts in a way consistent with the goals of Somerset Council. |

| 7.3 | Improve processes | 2022/23 | Implement process improvements to ensure that notification of new property occupation/home | |
|---------------------|-------------------|------------|--|--|
| | around occupation | | ownership is seamless and that we take advantage of this opportunity to change behaviours. | |
| | of new homes | | This will include reviewing whether we charge developers for certain costs that result from the | |
| | | | building of new homes, as many other authorities already do. | |
| 7.4 | Service guide | 2023/24 | Publish and distribute to every household an annual service guide including a collection day | |
| | _ | | calendar. This aims to encourage sound recycling behaviours and provide the information | |
| | | | residents need to manage their waste effectively. | |
| 7.5 | HWRC Signage | 2023/24 | Signage review of all HWRCs to make it easier for the public to understands what can be | |
| | review and | | recycled, what happens to it, how to keep safe – and hence drive behaviour change. Following | |
| | branding changes | | the creation of the Somerset Council the Somerset Waste Partnership brand will no longer be | |
| | | | used (which will impact on all aspects of our operations) and the Council's new branding will be | |
| | | | rolled out as quickly and cost effectively as is practically possible. | |
| How will we measure | | Proporti | oportion of online transactions, level of complaints, reach on key channels, survey feedback, resolution | |
| success? at first p | | at first p | oint of contact, reporting on project at key milestones | |

8. Supporting wider goals in Somerset
SWP spends approximately £50m of public money every year, our contractors employ well over 500 people locally, and we visit every

| hous | house in Somerset every week. It is important that SWP looks beyond its 'day job' to support the Council's wider goals. | | |
|------|---|---------|--|
| Wha | What | | Why |
| 8.1 | Tackling waste on the go | Ongoing | Whilst the street scene is not an SWP responsibility, what we do and how we do it impacts on the street-scene, and to male improvements we need to work closely with our colleagues. The move to a unitary authority should make it easier to improve how we work together, building on the effectiveness of recent pilot work (e.g. St John Street in Bridgwater). |
| 8.2 | Tackling fly tipping | Ongoing | Whilst tackling fly-tipping is not an SWP responsibility, what we do and how we do it can impact on fly-tipping or create a concern that it may impact on fly-tipping even where this isn't supported by the evidence. SWP will work closely with other parts of the unitary council and other stakeholders to seek to tackle fly-tipping even more effectively across Somerset. |
| 8.3 | Supporting local businesses and those far from the labour market | Ongoing | Ensuring we realise the relevant social value commitments from Suez including: 5% of collection contract spend retained in Somerset 2 campaigns delivered each year to improve the capture of materials 2 work placements per year (16 in total) for young people, inc. NEETs and care leavers, 2 community payback scheme placements per year (16 in total) |

| | | | Ensuring 5% of staff are in apprenticeships every year of the contract |
|---------------|---------------------|----------|--|
| 8.4 | Supporting our | Ongoing | In addition to training collection staff to be dementia aware, SWP will identify other ways we can |
| | most vulnerable | | support the wider agendas of our partner authorities – e.g. how we can more effectively use the |
| | | | eyes and ears of our staff on the ground to better support vulnerable residents. |
| 8.5 | Assisted collection | 2023/24 | Periodic review of our database of assisted collections to ensure that customer still require the |
| | review | | service. |
| | | | ports on projects at key milestones, fly-tipping data (in particular highlighting waste streams that |
| success poten | | potentia | lly link to waste collection/HWRC activities) with SUEZ providing a social value report quarterly. |

9. Enabling Activities

Some of SWP's less visible activities are essential to enable both our front-line services and our ambitious programme of change.

Business as usual activities (such as maintaining an up to date Business Continuity Plan) are not included here

| Dusii | ness as usuai activities | (Such as | maintaining an up to date business Continuity Plan) are not included here |
|-------|--------------------------|----------|---|
| Wha | What | | Why |
| | | | |
| 9.1 | Contract reviews | 2023/24 | To review the collection contract and recycling credits mechanism following national legislative |
| | | | change (extended producer responsibility, deposit return scheme, collection consistency) and |
| | | | to reflect a post-Covid world and post Recycle More. |
| 9.2 | Influencing policy | 2023/24 | It will be crucial that SWP uses its reputation as a sector leader and continues working through |
| | & developing a | | national bodies to influence policy and explore regional collaboration opportunities. Once |
| | long-term strategy | | national policy is clarified then SWP will seek to develop its own long-term strategy. |
| 9.3 | Waste | 2023/24 | SWP last undertook a thorough waste composition and recycling participation analysis in 2018. |
| 0.0 | composition and | | Waste composition analysis helps us understand what Somerset residents are throwing away |
| | recycling | | that could be reused or recycled, and recycling participation analysis helps understand more |
| | participation | | about people's recycling behaviours and hence what we can do to improve that. This will look |
| | analysis | | at both kerbside and recycling centres to get a full picture of behaviour post Recycle More. |
| 9.4 | Using data | 2022/23 | The in-cab devices (when used properly) provide significant amounts of data that we can use |
| 0.4 | effectively | | to target individual behaviours (e.g., sending automated letters to a household that repeatedly |
| | Checurchy | | don't recycle) and to target communities (identifying areas where presentation of additional |
| | | | refuse bins is at its highest). SWP needs to improve its capability in handling this data, and in |
| | | | combining this data with data on tonnages collected to provide real insights. |
| 9.5 | Post unitary | 2023/24 | With the transition to a unitary authority SWP will have enforcement powers for the first time in |
| 9.5 | transformation, | onwards | our history. Enforcement will remain the last option and SWP will continue to work closely with |
| | , | | , |
| | including on | | contractors and other services (e.g. street-scene) to resolve complex issues, investigate |

| enforcement | complaints, find solutions to problems and clamp down on abuse (including trade waste abuse & side/excess waste). Other transformation will also be possible once we are part of a unitary council, including as a result of potential legislative change (including on Persistent Organic Pollutants). | |
|------------------------------|---|--|
| How will we measure success? | SWP reports on projects at key milestones | |



[to be inserted to final Business Plan in February, following any MTFP decisions]