Organisational responses in full

Organisation	Date received
Aylesbury Town Council	10/9/18
Bradenham Parish Council	13/9/18
West Wycombe Parish Council	20/9/18
Quainton Parish Council	26/9/18
Princes Risborough Women's Institute	4/10/18
Coleshill Parish Council	10/10/18
Hertfordshire County Council	10/10/18
North East Burnham Residents Association	13/10/18
Bledlow cum Saunderton Parish Council	15/10/18
Granborough Parish Council	18/10/18
Burnham Parish Council	18/10/18
Chesham Town Council	19/10/18
Wycombe Friends of the Earth	21/10/18
Slough Borough Council	22/10/18
Joint Waste Collection Committee (Chiltern, South Bucks &	22/10/18
Wycombe District Councils)	
The Chesham Society	22/10/18
Aylesbury Vale District Council (received late)	24/10/18
Oxfordshire County Council (received late)	29/10/18

Aylesbury Town Council



AYLESBURY TOWN COUNCIL

Town Hall, 5 Church Street, Aylesbury, Buckinghamshire, HP20 2QP

Town Clerk: Keith Gray JP, CiLCA, FSLCC, MILM

01296 425678 01296 426134

Fax: Website: www.aylesburytowncouncil.gov.uk

Contact: E-mail:

Telephone:

Keith Gray (Town Clerk)

kgray@aylesburytowncouncil.gov.uk

1 2 SEP 2018

Cllr B Chapple OBE Waste Strategy Consultation Buckinghamshire County Council County Hall Walton Street Aylesbury

10th September 2018

Cllr A Harrison, ATC

Dear Cllr Chapple

Waste & Recycling Consultation

I am writing to convey the request from Aylesbury Town Council, and other parish councils, in respect of the Devolved Services Agreement we have with the County Council on matters relating to waste and recycling. The request being that we are allowed to take waste of all kinds to the local waste site without charge or hinderance.

Aylesbury Town Council acts as the "Cluster Lead" for several parish councils and we are responsible for works in relation to the Devolved Services Agreement (DSA) we have with Bucks County Council. The service we provide, and the DSA, is acknowledged by all involved to be a positive service to the local and wider communities we serve.

One of the responsibilities we have is to manage tree and hedging works as well as grass cutting, and the collection of fly-tip waste and general waste often left in areas of the community that can be difficult to ascertain who owns the land. It is common practice for the town council to remove this waste and take it to the local refuse tip for disposal regardless of whether it is on land owned or managed by us - the residents quite understandably just want it removed from public areas. We make no money from this and do it for the benefit of the residents and tax-payers. Many councilors, including yourself, have often raised issues of concern over waste left by others and asked the town council to step in and remove it.

It is important that we are allowed to continue to take waste, of whatever kind, to the local refuse tip without hindrance or an expectation to pay a charge for doing this. If we are charged then this would be double taxation for the residents and also may cause us to be specific in what waste we decide to collect, if any, and dispose of at the refuse site.

The Town Council therefore asks that we, and other parish councils, are allowed to continue bringing waste to the local refuse site without charge or hinderance. Could you please ensure that all officers involved, and personnel at the waste sites, are asked to give support to the local parish council officers delivering waste to the site and assist us without challenge?

I would be happy to explain our request in more detail if this is required.

Yours sincerely

Keith Gray, JP TOWN CLERK

Bradenham Parish Council

From: clerkbradenhampc@gmail.com <clerkbradenhampc@gmail.com>

Sent: Thursday, September 13, 2018 5:44:38 PM

To: Chapple, Bill - (County Councillor)

Subject: Household recycling centres consultation

Dear Cllr Chapple,

Thank you for inviting the parish council to comment on this consultation.

The only thing Bradenham parish council have to say on this is that Bledlow recycling centre is a useful community asset for our community. Having to visit Booker recycling centre would greatly inconvenience our residents, traffic is bad, ques are long. The parish council would prefer to see reduced opening hours as it does appreciate that saving need to be made.

→ Next = Last

Please note the new email address: clerkbradenhampc@gmail.com Please use this infuture.

Kind regards
Delirates
Delirates
Delirate Hansen
Clerk to the Council
Tel: 07391-896076

www.bucksvoice.net/bradenham-parish-council

West Wycombe Parish Council

From: Sharon Henson <clerk@westwycombe.org.uk>

Sent: Thursday, September 20, 2018 11:25 am

To: Chapple, Bill - (County Councillor)

Ce: Vicki Smith

Subject: Waste and recycling consultation

Dear Cllr Chapple,

The above consultation was considered at our Parish Council meeting and we would like to make the following comments on behalf of our residents. The survey is not suitable for a Parish Council response.

West Wycombe Parish Council strongly object to the Bledlow Ridge closure, as, due to its isolated rural location, this could cause fly tipping with all the associated costs. The Bledlow Ridge site serves a very wide rural area to the West of Wycombe and provides easy access for the disposal of rubbish for our residents and reduces traffic congestion at the High Heavens tip,

Yours sincerely

Quainton Parish Council

From: John Knox [mailto:John@xonk13.co.uk]

Sent: 20 September 2018 15:05

To: Waste Strategy

Cc: Blake, Janet (County Councillor); Malcolm Wearn; Arthur Evans; Nick Heirons; Michelle Thompson; Nick Butler;

Brian Fludgate; Claire Lucas

Subject: Quainton PC; Comments on Recycling Centre Consultation

Quainton Parish Council welcomes the decision to keep the Aylesbury, Rabans Lane Centre open.

However we have concerns that the depot is proposed to close on 2 days per week (Tuesday, Wednesday or Thursday)

Our concern is twofold - it will lead to longer queuing at weekends and will inevitably lead to fly tipping by users who are frustrated.

We take issue that fly tipping is mainly commercial tippers as our experience resulting in 2 or 3 referrals per month is of small case domestic waste such as sofas, fridges and small quantities of black bag waste on the C or unclassified roads surrounding the village.

These all lead to the A41 and the Rabans Lane centre. The A41 laybys also suffer from this type of waste.

As your survey indicates only 35% of users are regular the remainder being far more spasmodic with 24% calling only twice a year. It is from this 65% that most of the domestic flytippers probably arise as they attempt to use the recycling centre and find the place closed or a long queue.

In view of the need to raise revenues it is difficult to argue against charges for waste that the council has no obligation to provide a free service.

However we urge that these charges are kept to a minimum as any charge encourages fly tipping especially on the small scale that we see around Quainton.

Regards
John Knox
Parish Councillor
Quainton Parish Council

Princes Risborough Morning WI

4th October 2018

Dear Sir,

I am writing on behalf of Princes Risborough Morning WI Committee and Members to say how concerned we are about the proposed closure of Bledlow Recycling Centre. It is a very well used facility with constant comings and goings. We are worried about the environmental impact of such a closure particularly as it could result in fly tipping. Making users drive to Aylesbury or Wycombe will increase road traffic again impacting on the environment. Whilst we appreciate the need for economies in the current economic situation we would urge you to think again.

Yours faithfully,

Susan Rodwell

Secretary Princes Risborough Morning WI

Coleshill Parish Council

From: CPC Clerk [mailto:clerk@coleshill.org]

Sent: 08 October 2018 12:29

To: Chapple, Bill - (County Councillor); Democracy Mailbox

Subject: Council to consult on 'realistic' options to make household recycling centres affordable

Dear BCC,

Coleshill Parish Council would like to respond to the recent consultation on making recycling centres affordable. At the September PC meeting the Councillors discussed their concerns if some sites were to close or others reduce their hours.

Over the last decade residents have been encouraged to recycle either through roadside bin schemes or taking items to the local recycling centres.

The demographics of Coleshill village is that it is made up of commuters, elderly residents and young families all requiring flexible opening times to ensure that they can recycle rather than send to landfill.

The Council have asked me to write to you to ask you to reconsider reducing the hours or recycling centres and definitely not to close any.

Recycling for it to work has got to be easy for everyone.

One comment raised was that there is a lot of duplication between County and District when it comes to fly-tipping. Cost savings could be made if BCC were to amalgamate recycling centres and fly-tipping services which would ensure that current services at the recycling centres could remain.

Council would like to be kept informed of the outcome of the Consultation and the decision made by BCC into the future of recycling centres.

Kind regards Lynda Jackson Clerk to Coleshill PC

North East Burnham Residents Association



North East Burnham Residents Association Est. 2017

northburnhamra@gmail.com

NEBRA

Dear Mr Jenkins,

RE: CLOSURE OF BURNHAM RECYCLING CENTRE

I am writing to you as Secretary of NEBRA (North East Burnham Residents' Association) which centres on Green Lane, The Fairway and surrounding roads. One of our interests is planning and associated issues and so the proposed closure of the Burnham Recycling Centre would affect us adversely.

There are two issues which we would like to raise with you: fly-tipping and 'The Way Forward'. I will now deal with these issues in turn.

Fly-Tipping

We note with interest the evidence you have produced on this subject in the Household Recycling Centre Service Review consultation document dated 5th October 2018: you contend that there will be no increase. This is very much at odds with the Freedom of Information data which we have obtained from SBDC and which shows the following:

2013/14 351 fly-tips 2014/15 482 fly-tips 2015/16 549 fly-tips 2016/17 608 fly-tips 2017/18 676 fly-tips

You will note that over the four year period, 2013/14 to 2017/18, there has been a 93% increase. In spite of your considerable efforts on this issue, fly-tipping is already evident in Green Lane along the boundaries with the Golf Club, in Dorney Wood Road near the NT Dorney Wood House, along Grove Road and in Burnham Beeches itself. It is our view that the closure of the Burnham Centre will lead to a further exacerbation of this unacceptable situation.

The Way Forward

It is appreciated that you need to make savings in operating costs of £1.2 million per annum. We believe this can be achieved by adopting the closure of Bledlow Ridge, charging for 'non-household waste', closing Aylesbury, Chesham and Burnham on, say, Wednesday and/or Thursday each week, and charging residents from outside Bucks., for the use of BCC Centres. This, of course, will need to be backed up by already available new technology.

We would be grateful if the remedies we have suggested in 'The Way Forward' could receive your full and unbiased consideration. Should you feel it necessary, we would be pleased to discuss these ideas further.

Yours sincerely,

Mrs Tina Manzi, Secretary, NEBRA.

Hertfordshire County Council



Buckinghamshire County Council County Hall Waste & Recycling Team Floor 7, County Hall Walton Street Aylesbury HP20 1UY

Hertfordshire County Council Waste Management Unit CHN104, Pegs Lane Hertford, SG13 8DN

Telephone: 01992 556207 Fax: 01992 556180

e-mail: matthew.king@hertfordshire.gov.uk

Date: 10th October 2018

Submitted via email to: waste strategy@buckscc.gov.uk

Dear Sir/Madam,

Re: Household Recycling Centre consultation

Thank you for the opportunity to submit the views of Hertfordshire County Council (HCC) in response to the publication of the above consultation.

HCC is a large waste disposal authority providing services for in excess of 1.18 million residents in 485,000 homes. The Authority currently spends approximately £45 million per annum providing waste management services across the county. More specifically, and in relation to this consultation, HCC provides a network of 17 Household Waste Recycling Centres (HWRCs) which receive in excess of 2.3 million visits per annum and manage the receipt and disposal of circa 83,000 tonnes of waste per annum.

We understand that housing growth requirements and financial pressures faced by Local Government are significant. It is projected that, for HCC, a further 100,000 homes will be required over the next 15 years and the resourcing gap between available funding and the continuing pressures on the authority's budget will be nearly £100m per year by 2021/22. This is after the delivery of £285m of savings per year by the end of 2017/18.

Responses to the consultation are as set out below:

Whether to close one site or two

HCC has no objection to the closure of either or both of the identified sites. Through our own considerations of the HCC network of sites, we believe that a network of fewer, larger, better located and more modern centres could provide services that are better equipped to meet future demand and pressures. In reality, this may require high levels of investment in a more strategically located suite of centres and recognises that, at a local level, some areas within an administrative boundary may currently be 'over-provided' for, in comparative terms, than others.

Hertfordshire County Council cont.

Which two weekdays it would be better to close Aylesbury (Rabans Lane), **Burnham and Chesham sites**

HCC note that the Aylesbury (Rabans Lane) and Burnham sites identified would likely have a minimal impact on Hertfordshire residents who have adequate nearby facilities.

With specific regard to the close geographical proximity of the Chesham HRC to our own Berkhamsted centre, should the two weekday closures be implemented, we express a preference for closure days that do not coincide with those at our own Berkhamsted centre in Hertfordshire (which are Thursday and Friday each week).

Subject to your other considerations in this consultation, this could ensure that we jointly provide local residents with a reasonable option for the disposal of their household waste 7 days a week.

Whether to charge residents from outside Buckinghamshire for using our sites, stop them using the sites altogether or continue to allow the same access as Bucks residents.

HCC's strong preference is that Buckinghamshire County Council should not restrict access to Hertfordshire residents and should continue to recognise, as is set out in the supporting information to this consultation, the 40 years of use by Buckinghamshire residents into our Tring centre and the existing absence of any scheme to restrict Buckinghamshire residents from using Hertfordshire centres.

Acknowledging the scale of the challenges faced by Local Government, should your authority decide to implement some form of cross border policy, HCC would suggest that whatever you adopt continues to permit access to Hertfordshire residents even if charges are introduced.

HCC believes that this would be a more reasonable position to adopt than an outright ban and residents of west Hertfordshire, such as in the Long Marston and Tring areas, would then have a choice to use a free Hertfordshire centre, such as in Berkhamsted, or visit centres such as that at Aston Clinton and pay to access the facility.

Noting that the volumes through your Household Recycling Centres are similar to those being managed through the Hertfordshire network of 17 centres and with greater visitor numbers, thought could be given to further restrictions on

Buckinghamshire's van, trailer and commercial vehicle policy, that is, to place a limit on numbers of visits allowed in each year such as the 12 visits per year limit in place across the Hertfordshire network. This would mirror neighbouring policy and perhaps be an alternative to cross border restrictions.

HCC welcomes the invitation to participate in this consultation and the previous working group engagement and trust that the above comments are considered constructive

Yours faithfully,

Matthew King

Head of Waste Management & Environmental Resource Planning

Hertfordshire County Council

Granborough Parish Council

From: davidsmdly@aol.com [mailto:davidsmdly@aol.com]

Sent: 18 October 2018 13:28
To: Chapple, Bill - (County Councillor)
Subject: Review of Household Waste Sites

Dear Councillor Chapple

Granborough Parish Council (GPC) has considered the proposals that Bucks CC has publicised for the provision of HWRCs in the county and in addition to the response pro forma would like to make the following comments to you.

1. <u>Closure of 1 or 2 sites in South of the County</u> – as all the sites south of Aston Clinton are not really of use to the residents of N. Bucks (AVDC) it is considered inappropriate for GPC to comment on such proposed closure(s) other than to say if BCC considers that there is over provision in the south of the County then this should be addressed by closure to create maximum savings at the earliest opportunity. If it is possible to provide adequate site provision by closing of two sites then this must be the preferred option.

GPC considers that even with the proposed closure(s) the resultant distribution of sites shows a clear imbalance serving the north which needs to be addressed in parallel to the closures. With the north being identified as the area for the greatest growth in housing numbers GPC considers that as part of this review there should also be a set of proposals for new or enlarged provision in centre and north of AVDC.

- 2. <u>Proposals to close Rabans lane site two days per week</u> GPC **cannot** support this proposal, as the current provision of sites for the Granborough area is limited to two sites (Aston Clinton not being a practical alternative), this would reduce to one on closed days. Environmental sustainability will be impacted as people who need to travel to Aylesbury for other reasons on a "closed day" will not be able to combine the trip with use of the HWRC. Furthermore, closure will only increase pressure on the busy days such the weekends when queues can already stretch someway along the length of Rabans lane.
- 3. Proposals to charge for some non-household wastes- GPC is **not** opposed to the proposal to charge for the waste listed i.e. rubble, soil, plasterboard and tyres but is very concerned that this would be start of a charging regime for other wastes which are not classified as household waste in particular DIY waste. Granborough PC recognises this is a difficult area as DIY waste amounts can vary greatly, but is would be inappropriate to stop or charge the residents for small amounts of DIY waste as where do you draw a line would you really charge for an empty paint tin and some old wallpaper? What is needed is far greater control regarding the acceptance of large amounts of building waste under the cover of DIY waste which is really trade waste alleged to be a common site at the Buckingham and Rabans Lane sites
- 4 <u>Restricting access to Bucks residents only</u> GPC **would support** the proposalas the residents of North Bucks gain no appreciable reciprocal benefit from sites in neighbouring authorities, and whilst it is appreciated that residents of other authorities living close to the borders may find the sites in Bucks more convenient then they should either be charged or not allow to tip.
- 5 Overall comments on proposals
 - i) GPC is not convinced by BCC's assurances that such proposals will not lead to an increase in fly tipping. If people find tips closed, or they have to pay or types of waste are refused what will they do with it? Unfortunately a minority will fly tip. It is recognised that BCC is very active in chasing and prosecuting fly tippers, but the cost of the clearing up does not fall to BCC but rather to the District Councils. where the fly tipping is on public land. Where it is private land the responsibility and cost of clearance/disposal falls to the land owner, in many cases local farmers. It is doubtful whether there are accurate statistics relating to this type of fly tipping.
 - ii) If certain waste cannot be taken to the HWRC or sites are closed what other option is there to the public? One option will be to hide non- permitted waste in the wheeled bin household waste collection service. Wheeled bin collection systems make it extremely hard to detect non permitted waste unless it is obvious at the top of the bin. Additional waste collected through the wheeled bins scheme is an additional cost to the DC's whereas its impact on BCC is neutral as they would have paid the disposals costs through the HWRC.
 - GPC hopes that you consider the above comments as part of your review of the public consultation exercise and in particular will consider carefully the need to increase provision in the North of the County, and not reduce it by part week closures, and that you will carefully consider the question of increased fly tipping and the resultant costs to land owners.

Yours Sincerely

David Smedley Vice Chairman Granborough Parish Council

Burnham Parish Council



Gurbaksh Badhan Head of Waste Management Buckinghamshire County Council Walton Street Aylesbury HP20 1UA

Burnham Park, Windsor Lane Burnham, Bucks SL1 7HR Tel: +44 (0)1628 661381 • Fax: +44 (0)1628 666025

18th October 2018

Dear Gurbaksh,

Re: Household recycling centre service review consultation

I am writing on behalf of Burnham Parish Council to make our formal response to the Household Recycling Centre consultation.

Firstly, our thanks to you and Bill for taking the time to attend the Parish Council meeting last month. The Parish Council has considered the matter at length, taking into account the views of local residents and stakeholders.

The Parish Council is very concerned at the potential loss of an important local facility, and strongly urges the County Council to dismiss Option B: the closing of Bledlow and Burnham HRCs.

Furthermore, councillors would like the following items to be taken into consideration:

Charging

It was felt that further investigation was needed into the potential of meeting your budget shortfall through charging, including for:

- · Non-household waste
- Non-statutory waste
- Non-Bucks residents

Travel times to alternative sites

It was felt that the travel times to alternative sites were inaccurate, and that longer than anticipated journeys were likely, especially at peak traffic times, which were not included within the estimates.

It was also noted that journey times for residents of Dorney and Taplow would be much further.

It was also noted that there was mention of neither the environmental impact nor congestion issues caused by the potential increase in traffic.

Weekday closures

It was suggested that should partial closures of the three sites be implemented, consideration be given to not aligning the days in order to allow staff to be rotated across the sites, to achieve further potential savings.

Cont.

Burnham Parish Council cont.

Survey design

Councillors were dismayed at the design of the survey, which appeared to encourage a biased response. In particular, it was note that:

- Respondents were not able to rank which options, or mix of options, they would prefer
- There was no option for respondents to provide their own preference on which site to close
- It was not clear how the option to close three sites for two days a week would work with the proposed closure(s)
- The results of the survey as constructed would likely be statistically flawed, potentially allowing any outcome to challenged

The Burnham Household Recycling Centre is an essential community facility, and we again urge the County Council to **not** implement Option B.

Thank you for your time and consideration of our response.

Yours sincerely,

Tabish Wazir Deputy Parish Clerk

Cc Bill Chapple OBE, Cabinet Member for Planning & Environment

Chesham Town Council

Bill Richards Town Clerk



Cllr Bill Chapple Environment Cabinet Member Bucks County Council Aylesbury Bucks Tel: 01494 774842 Fax: 01494 582908 www.chesham.gov.uk Email: admin@chesham.gov.uk

Dear Cllr Chapple,

We write in relation to the public consultation into proposed changes to the provision of Household Recycling Centres across Buckinghamshire. Chesham Town Council (CTC) discussed its position in respect of the proposed changes at its Planning meeting held on the 1st October 2018 and would make the following observations.

- 1. As the 3rd largest town in Buckinghamshire, Chesham has a proud record of protecting and delivering exceptional services, not only for the residents of our town but for many outlying villages and larger settlements. We have to question why the well-used site on Latimer Road, serving such a large area, should be considered for partial closure on 2 days a week. We believe that any reduction in opening hours would have a detrimental effect on the provision of services to our residents and that is not a situation we can support.
- 2. CTC is concerned that the closure of the Latimer Road Centre will potentially lead to a significant increase in fly tipping incidents outside the gates of the centre and across the town. We have several charity shops and external collection points in Chesham and often find that residents, with good intention, leave bags of donated items that ultimately present a littering problem that CTC has to resolve. We are concerned that the closing of the gates to our local centre will simply lead to large amounts of materials simply being left for workers to deal with when the centre re-opens later in the week.
- 3. Punitive charges for the use of centres will deter users and lead to an increase in fly tipping generally at increased cost to Buckinghamshire residents. At the beginning of October, Browns Road in Hyde End was closed for over a week while BCC took action to resolve a major fly tipping incident. Local social media sites saw high levels of activity around this issue, major concern expressed about BCC's lack of decisive action on the matter and further deterioration in resident confidence that BCC can cope with such matters. We believe that centre closures and reductions in opening hours will lead to more frequent incidents of this nature.
- 4. The proposed closure of one or more centres in Buckinghamshire should present significant savings to Bucks County Council (BCC). These savings should be sufficient to preserve a full service at the other centres and residents should not bear the consequences of any further reductions in service.
- 5. By your own admission in your consultation data, the Amersham site on the A413 is one of the four quietest sites you operate. Why then would BCC choose to close the Latimer Road site 2 days a week instead of reducing operations at the A413 Centre?
- 6. The Latimer Road Centre in Chesham is located on the periphery of the town and is well served by a main road that links into nearby villages and provides access into Amersham via link roads through Chesham Bois and Little Chalfont. Although it is well used, the road is considered safe and has additional capacity to handle greater volumes of traffic. The entrance to the site also benefits from a wide and clear vision splay. It compares much more favourably to the notoriously difficult and dangerous entrance to the A413 depot site on the far side of Amersham. The A413 features exceptionally heavy usage at all times of the day. Access into the site often leads to a queue of vehicles causing tailbacks and potential major highways hazards along the main road. These highways issues would be alleviated by partial closure at the A413 site.

Chesham Town Council cont.

- 7. The A413 Centre also shares the site with BCC's highways works depot. It is subject to high volumes of commercial traffic entering and leaving the site, including exceptionally large domestic waste and recycling vehicles and a high volume of highways works vehicles. The entrance to the site has a dangerous layout that subjects domestic vehicles to potential danger as works and waste vehicles cross the site to enter the BCC depot. A reduction in operating hours would be better suited to the A413 site and would reduce the potential for serious collisions between domestic and industrial vehicles. The Latimer Road site does not present the same level of risk and is a safer site for residents of Amersham to use. Why then would BCC consider reduced usage at the Latimer Road site when it would make more sense to protect resident safety by reducing use at the A413 site?
- 8. We are concerned about how BCC proposes to restrict usage or charge residents from outside Buckinghamshire for using Buckinghamshire centres. The Latimer Road site sits on the border of Hertfordshire and is well used by nearby villages and settlements. We fail to see how BCC can monitor users and make the distinction between residents of either authority. Is it truly in the interest of the taxpayer to refuse entry to a neighbouring authority's residents, or inflict punitive charges, that will prevent them using a facility? As a local authority we strive to promote ethical environmental practice and forcing Hertfordshire residents to make excessively long journeys to alternative centres is not in keeping with our aims and beliefs.
- 9. Any potential savings made by deciding to close centres or reduce their opening hours will surely be minimal compared to the cost of installing additional security / monitoring systems, an ANPR system, establishing and maintaining a costly permit system or the costs associated with employing staff to provide admin support and police sites. There are also highways safety and personal privacy issues relating to any kind of physical on-site monitoring. The need to check customer address details will severely delay entrance to centres and place frontline staff in harm's way from any customers that need to be challenged. Any system should not result in the build-up of traffic outside access points, many of which already have the potential to create highways issues.
- 10. Similar concerns relate to the proposal to start charging for specific materials being disposed of at BCC Centres. How do you propose to monitor / police such an initiative? Does BCC plan on physically checking individual vehicles? What would the cost be of providing additional manpower and / or systems to deal with this? What kind of delays would such systems lead to? What effect would proposed limitations have on resident satisfaction levels and would it be harmful and lead to significant reductions in resident recycling levels?
- 11. In the course of their deliberations, Members of CTC attempted to access BCC's online survey attached to this consultation. They complained of inadequacies in the system as it was prone to crashing consistently due to an error on a specific page. BCC's consultation could be seen to be flawed if residents and interested parties are unable to give feedback via this portal.

Our primary objective during this period of consultation is to act as the voice of Chesham's residents and ensure that any changes you implement are not to their detriment. We hope this letter makes clear our concerns, and we look forward to your response.

Yours sincerely,

Bill Richards Town Clerk

Bledlow cum Saunderton

Bledlow-Cum-Saunderton Parish Council

Household Recycling Centre Service Review Consultation - Parish Council Response

Bledlow-cum-Saunderton Parish Council have considered the proposals brought forward within the Household Recycling Centre Service Review.

Having considered the views of our residents, including those made on Social Media, expressed via Petitions and in person at our Parish Council meeting of 4th October the Parish Council is unable to support the closure of the Bledlow Ridge Household Recycling Centre as proposed.

Rationale

Suitability of alternatives

- Neither alternative sites (Aylesbury and High Wycombe) are easily accessible from Bledlow Ridge. We believe that the travel times quoted in the survey are unrealistic and in any case the way the information is presented is misleading – in reality the extra journey time would be double that amount quoted – simply because there is a return trip involved!
- Journey times would likely be longer on peak weekends and bank holidays when the roads in and around High Wycombe in particular can become busy with shoppers and fans travelling to watch Wycome Wanderers.
- The closure of the facility will result in additional traffic on the A4010 through West Wycombe, where there is an acknowledged air quality issue.
- An alternative that might be acceptable to the community would be to increase the
 frequency of green waste collections from households currently fortnightly and the in part
 the responsibility of Wycombe District Council. Increasing the frequency to weekly would
 reduce the reliance on the site for the disposal of grass and hedge cuttings for example.

Removal of a Local Amenity.

 Residents in the Parish receive very little from Bucks CC in the form of local services and amenities. Closure of the site will mean that our residents will be deprived of an essential local facility.

Fear of fly tipping

Although discounted as a risk by Bucks CC local residents have expressed a fear that fly
tipping will increase as a result of the closure. It's understood that the closure of the site is
unlikely to lead to an increase in 'criminal' tipping by rogue contractors however the concern
is that there will be an increase in casual dumping of 'household' items that would otherwise
have been disposed of correctly. We have some evidence of this already where rubbish
accumulates around litter bins.

Cost savings and income opportunities

- We note that the costs savings associated with closing the site are fairly modest £160k per
- The local view is that Bucks CC have not fully explored the options available to them to
 charge site users. For example from charging 'cross-border' users and charging in all
 instances where legislation allows. We also suggest a charge be made for disposing of items
 such as tyres and fridges if not covered in the above.
- With 97000 annual visits raising £160k collecting on average just £2.00 per visit would more than exceed the claimed costs associated with running the site.
- We'd also question whether BCC are maximising revenue. Not so long ago it was possible to buy items such as second hand bicycles and outdoor play equipment from the site. This simple cash trading could easily be re-instated.

Cont.

Bledlow cum Saunderton cont.

Longer Term View

We recognise that in many ways the current Bledlow Ridge site is far from ideal. The presence of a Recycling Centre in an otherwise rural location in an AONB and within the Green Belt is in itself somewhat anachronistic. The layout of the site does not allow a one-way traffic flow. This, combined with the popularity of the site, can lead to vehicles queuing on Wigan's Lane, a rural road subject to a national speed limit and popular with cyclists and walkers, particularly on weekends and bank holidays. The site also generates a number of HGV movements, which are contributing to the poor state of our fragile lanes.

Given the above our view is that the current site will not be able to handle the increase in usage that can be anticipated should the planned expansion of Princes Risborough take place.

Should the plans come to fruition we would be supportive of a new facility being created in a more suitable location to serve Princes Risborough and the surrounding area, at which point in time the Bledlow Ridge site would become surplus to requirements.

Alternative Uses for the Site after Closure

In the event that the site is closed as proposed it appears likely in the current economic climate that Bucks CC would want to re-use or dispose of the site rather than incur the costs associated with ongoing security and maintenance. Keeping the site secure would be essential given that our area has a history of Travellers illegally occupying land and more recently regular incidents of trespass on the site of the derelict Molins factory.

The Parish Council would welcome the opportunity to be consulted and work with BCC and other interested parties in exploring alternative uses for the site.

Stephen Reading

Chair - Bledlow cum Saunderton Parish Council.

Slough Borough Council

Andrew/Gurbaksh

Please find below Slough Borough Councils response to the BCC Consultation on its HRCs. I attach your document for reference to the questions only. Our answers are set out in the email below:-

Q1 - Slough Borough Council

Q2 – Should you decide to open Burnham HRC 5 days per week rather than 7 then we don't have a strong preference which of Tuesday, Wednesday or Thursday should be the days on which you close. Residents will plan their trips to the HRC around opening hours once they are understood. Operationally, consecutive days closing is easier to manage.

Q3 – Slough BC currently pay for Slough residents to use Burnham HRC and Langley HRC through a long established mechanism which apportions all costs at the two HRCs to either Bucks CC or SBC based on a utilisation survey. At the time of writing SBC would prefer this mechanism to continue.

Q4/Q5/Q6 – SBC would prefer Burnham HRC to remain open but should the outcome of the consultation process conclude that it needs to shut then SBC will continue to work collaboratively with Bucks CC.

Q7 – The impact of Bucks CC changes to HRCs on SBC will need to be assessed on an on-going basis once the outcomes of the Bucks CC Consultation are known and new processes implemented post 1 April 2019. Possible impacts are:-

- Reduced charge from Bucks CC to SBC for use of Burnham HRC by Slough Residents
- Increased charge from Bucks CC to SBC for use of Langley HRC by Slough Residents
- Increased usage of SBCs Chalvey HWRC
- Financial incentive for Bucks CC residents wishing to dispose of chargeable household waste to travel to SBC's
 Chalvey HRC for free disposal of chargeable household waste should SBC not impose a similar charge or restrict
 usage to Slough residents only. Note this would have knock on effects to reciprocal arrangements between SBC
 and RBWM

Regards

Richard West

Service Lead – Environmental Services, Slough Borough Council Chalvey Recycling Centre, White Hart Road, Slough, Berkshire, SL1 2SF

Joint Waste Collection Committee

Joint Waste Services King George V House King George V Road Amersham Buckinghamshire HP6 5AW





Joint Waste Team

Bill Chapple OBE Buckinghamshire County Council County Hall Walton Street Aylesbury HP20 1AU

This matter is being dealt with by:	Joint Waste Collection Committee
Our Ref:	11.1
Date:	22 October 2018

Dear Cllr Chapple,

Joint Waste Collection Committee response to Buckinghamshire County Council's consultation on Household Recycling Centres

We are responding to your current consultation to review the Household Recycling Centre service provided by Bucks County Council. The matters you are consulting on were considered by Cabinet Members at the Joint Waste Collection Committee on 3rd October.

We understand that you need to find savings; this is of importance to all authorities. However, in summary, we do have serious concerns on the impact of your proposals to the south of the county and would like to have more information and evidence used to inform these proposals.

We strongly object to the proposed closures and reduced availability of HRCs and are concerned about subsequent potential impacts, including increased fly tipping levels, impacts on environmental issues, detriment to local resident convenience and overall costs to our council tax payers.

We are not supportive of your proposal to charge Buckinghamshire residents for other types of waste and anticipate that this could also impact negatively on fly-tipping levels. In terms of charging residents from outside of Buckinghamshire, we would like to understand how you would manage this.

We are disappointed not to have been considered an official consultee ahead of your public consultation; this would have been more within the spirit of our waste partnership.

Our detailed comments are outlined below:

Potential closure of sites and reduced opening

Closure of the Bledlow Ridge site will particularly affect residents living in Princes Risborough and to the north of Wycombe District. The Princes Risborough area is due to experience substantial property growth and closure of this site will not meet those residents' needs. We are concerned about this proposal and would like Bucks County Council to explain what work has been undertaken to assess future need based on the expansion planned for this area. Have you carried out any modelling to assess need against property growth? In terms of future planning, we would like you to explain why you are proposing to reduce access to HRCs when your own figures, as set out in your minerals and local plan, 2017 set out that demand will be increasing.

Joint Waste Collection Committee cont.

It is unclear whether your strategy has considered overall property growth for the county and, if sites are closed and opening times are reduced, what research has been undertaken to understand how this might impact on remaining sites?

Will the remaining sites, some of which will be closed for two days a week, be able to cope with the anticipated increased usage? Have you evaluated potential traffic congestion at sites and whether this will impact the infrastructure leading into your facilities? Some residents will have further to travel and will have reduced opportunities for using your sites.

Have you conducted any research to assess the impact of diverting traffic from this area to other sites around the county and the associated carbon impact as a result of increased travel time? We would like to know if you have carried out an air quality impact assessment and a traffic impact assessment to consider these issues and we would like to review those findings.

The potential closure of the Burnham HRC also raises some concerns, especially as South Bucks District Council is subject to high fly-tipping levels due to its proximity to London and the area around Slough.

Fly-tipping

Your consultation sets out that you do not expect to see fly-tipping levels increase as a result of reduced opening and that the reduction in winter opening hours in 2016 did not result in this. However, the winter opening times were only reduced by 2 hours and this is quite different in scale to the closure of 1-2 sites in the southern districts in addition to a reduction in opening hours of other sites of two days a week. What detailed research has

been conducted to properly assess the probability and implications of increased fly tipping as a result of your proposals?

This would inevitably impact on the Waste Collection Authorities budgets for fly tip removal and could further stretch the waste enforcement resources at Bucks County Council, for which the Districts provide a financial contribution. Have you assessed the impact of this as a total cost to the council tax payer?

We are able to cite information from an Evidence Review of Fly tipping Behaviour, prepared by Zero Waste Scotland, May 2017, which strongly points towards increased fly-tipping levels as a direct result of barriers imposed by local authorities to ease of access or affordability for the disposal of waste. To summarise here, such barriers include:

- · A low number of household waste recycling centres in a local authority,
- · A long distance to the nearest household waste recycling centre,
- A lack of transport options to reach the household waste recycling centre (e.g. where access necessitates car ownership),
- · Inconvenient opening hours of household waste recycling centres,
- · Regulations limiting free access to household waste recycling centres

In addition, Keep Britain Tidy found in a recent survey that 53% of local authorities, who state that fly-tipping is a major problem for them, think that changes including closing household waste recycling centres have contributed to increases in fly-tipping.

For your information, the evidence review provided by Zero Waste Scotland can be found

https://www.zerowastescotland.org.uk/sites/default/files/Evidence%20Review%20of%20Flytipping%20Behaviour.pdf

Further evidence provided at: http://www.tacklingflytipping.com/Documents/NFTPG-Files/Jill-Dando-report-flytipping-research-report.pdf, cites that there are two key drivers of fly tipping:

Joint Waste Collection Committee cont.

- · The costs of legitimate disposal and;
- · The availability of civic amenity and other waste disposal sites

In addition to greater occurrences of fly tipping if a site is closed, it is likely to result in more burning of materials in gardens where it is deemed to be easier than driving further distances to another site. This will add to Council enforcement costs and more worryingly,

increases in local air pollutions levels which will have a detrimental impact on the local environment.

Charging for waste

We understand that you are not consulting residents on charging for waste but that you have taken a decision to introduce charges for non-household waste, such as rubble and hardcore. You set out that you have asked resident views on this in your annual customer survey and at discussion groups and that there were mixed views on this. Whilst we appreciate that you are entitled to charge for this type of waste, have you considered how this will impact on waste collected by the Waste Collection Authorities? If you have received mixed views on this, then it is reasonable to expect that some residents will dispose of such waste within their wheeled bins rather than pay for disposal at an HRC. This may have health & safety implications, as well as other impacts on the kerbside collection service, such as the rejection of ad-hoc waste not permissible for disposal at your EFW? What are the implications for this facility?

We are not supportive of introducing charges to residents for the disposal of their DIY waste and again, have serious concerns about the impact of this on fly tipping. You will also be aware that the Waste Collection Authorities do not collect DIY waste, rubble, soil etc. as part of their chargeable bulky waste collection and we are not obliged to do so. Therefore, what steps do you plan to take to emphasise residents' duty of care responsibilities if they choose to engage contractors to remove such waste from their homes?

On the charges to residents outside of Bucks, we would like to understand how you will manage this. One idea is to introduce a Bucks card for Buckinghamshire residents as proof of residency and we would like to know if you have considered this.

Costs V Savings

Ultimately, we would like to understand if you have undertaken assessments on whether the potential savings you have flagged will result in additional costs elsewhere, for example to the Waste Collection Authorities, and if you can comment on the total cost to the Buckinghamshire council tax payer resulting from your proposals.

We are disappointed that we were not given an opportunity to offer our views above and participate in the debate on this proposal before Bucks County Council went out to public consultation.

Yours faithfully

Joint Waste Collection Committee

Cllr Mike Smith – Chair of JWCC Cllr Julia Adey Cllr Luisa Sullivan

The Chesham Society



BUCKINGHAMSHIRE HOUSEHOLD RECYCLING CENTRE Public Consultation

A submission by the Chesham Society

5. We propose to close the below sites on two of their quietest weekdays. All sites would stay open on Friday, Saturday, Sunday & Mondays.

If you have a preference for which weekday a site should remain open, please indicate this below

We strongly object to any closure of Latimer Road site, on several grounds -

- Latimer Road is equidistant from Amersham and Chesham (which is the larger of the two towns), while the London Road site is on the far side of Amersham from Chesham. Consequently, closure of Latimer Road would inconvenience more users.
- The split level Latimer Road site is more convenient & quicker to use than London Road
- Access to London Road from the A413 can cause traffic safety and management issues, which will be made worse during the HS2 construction phase (particularly construction of the Vent Shaft at Bottom House Farm Lane)
- It would be more equitable, and less disruptive, to close 6 sites for one day each

6. People from outside of the County use Buckinghamshire Household Recycling Centres, at a cost to local taxpayers. What do you think we should do about this?

A. Nothing

- The cost of additional waste is probably small when compared with the cost of running the centres
- The additional bureaucracy involved would reduce the amount raised
- · Bucks residents would be inconvenienced by having to prove their identity
- It would be an unfortunate precedent, which might result in other authorities charging Bucks residents who use their facilities
- Efforts should be made to obtain financial support from Oxfordshire & Hertfordshire to support Bledlow, Aston Clinton.
- Langley is already supported by Slough, so the majority of out of area use is already accounted for.

Cont.

The Chesham Society cont.

7-9 We cannot continue with 10 Household Recycling Centres. ...

The savings of £160K/site are small compared with the £1.2m being sought, and the £800K to be raised by charging for some types of waste. Attempts should be made to obtain financial support from neighbouring authorities, before considering site closures.

Other remarks

You state that 2/3rds of people visit once a month or less – implying 1/3rd visit once a month. Since visiting the tip is not usually a family expedition, this would imply that most households use the tips around once a month.

It is strange that your map does not include the location of waste centres in adjacent counties, particularly since you are consulting on cross-county use.

The range of options on which you have consulted is quite unnecessarily narrow, and there is no evidence to show that other options have been considered, and why they were rejected.

We are sceptical of your contention that fly tipping is not related to the availability of recycling centres. If fly tipping costs Bucks £750K/year (Bucks Herald, 24-8-18) then a 20% increase in this expenditure would cancel the savings made by closing a recycling centre.

Jim Conboy (Planning Officer)

Wycombe Friends of the Earth

Received via online survey:

This is an organisational response on behalf of Wycombe Friends of the Earth, following discussion at our group meeting and by e-mail. These are the factors and principles which underpin our comments:

- 1. Waste should not be viewed simply as something problematic that needs to be disposed of, but as a resource, which should be avoided / reduced, re-used, recycled etc. in line with the waste hiearchy. As resources grow scarcer, and the adverse environmental impacts from inappropriately discarded rubbish• become clearer, this will become ever more important, with the ultimate goal of a circular economy•.
- 2. Therefore, one of the objectives of waste recycling policy should be to ensure that waste is dealt with by the most appropriate route, going to facilities where it will be processed safely, and maximising its resource value. Waste recycling centres are such locations, so providing sufficiently convenient access to such sites has an environmental aspect as well as just a quality of consumer service one: even if resorting to fly-tipping might be rare, reduced access may lead, for example, to the public putting inappropriate items in black bins or simply stockpiling unwanted items at home, losing any potential from recycling of materials. Decision-making would be improved if such broader environmental considerations were incorporated into cost-benefit calculations.
- 3. Again, for journey times, the environmental costs of longer journeys is also an element that should be given due weight.

Cont.

Wycombe Friends of the Earth cont.

4. Since environmental factors and consequences, and, indeed, people's behaviours and sense of identity, are not bound by artificial administrative boundaries, it is wrong to consider Buckinghamshire and Buckinghamshire sites in isolation; this is particularly relevant to Oxfordshire (see Q6).

Where the questions, and questions format allows it, these principles underly our choices above:

- a) if a site has to be closed, close Burnham since less impact on journey times, both for Bucks residents and out-of-county;
- b) retain Bledlow, because greater impact on journey times if closed, especially if Oxon residents taken into account;
- c) align any charges for non-household waste (either for all users or just for Oxfordshire residents) with Oxfordshire ones, allow continued access for Oxfordshire residents on that basis, and negotiate identical access for Buckinghamshire residents to Oxfordshire sites, especially Oakley Wood, which would become the closest site to the southwestern corner of Buckinghamshire (and thereby, overall, minimise travel distances for Bucks / Oxon residents living close to border) We also strongly support increasing the number of charity re-use shops at WRCs, since re-use is clearly the best solution for unwanted items.

Other comments although ultimately not altering our choices, we make them because we believe they are shortcomings in the supporting documentations analysis:

- 1. We are not at all convinced by the assertion that reduced access / introduction of charges will not increase fly-tipping, especially since the service review background information on the website points out that the majority of fly tips are by commercial operators, not by householders. There is always a cost to disposing of commercial waste, which some operators try to avoid which implicitly recognises that cost of disposal IS a factor in fly-tipping.
- 2. That page also points out the high cost of dealing with fly-tipping (£610,000 in 2017/18) so even a 20% increase in fly-tipping would make significant inroads into the estimated savings from HRC changes.
- 3. How can the savings from charging for certain types of household waste be known and incorporated in the rationale for the changes, when no decisions have been made about what the charges will be, or, especially, about how they will be collected and thus the cost of doing so?

Aylesbury Vale District Council

AYLESBURY VALE DISTRICT COUNCIL

Councillor Sir Beville Stanier Cabinet Member for Waste and Licensing

Telephone: 01296 585712

Text Relay: prefix telephone number with 18001 Email: BStanier@aylesburyvaledc.gov.uk

Our Ref: Your Ref:



24 October 2018

Councillor Bill Chapple Buckinghamshire County Council

Response to Buckinghamshire County Council Consultation regarding Household Recycling Centres

This letter details Aylesbury Vale District Council formal Cabinet response to the BCC consultation on Household Recycling Centres.

Firstly it is with genuine disappointment that AVDC was not invited as a formal consultee to comment on the proposals set out in the Consultation documents. As a joint financing partner of the Bucks Waste Partnership it is most unfortunate that this forum was not used early on to help shape BCC's options and proposals, share the learning of your research and have the opportunity to discuss the impact of your proposals on us as a Waste Collection Authorities in Buckinghamshire.

Because of this AVDC are having to approach the proposals not fully understanding the potential or unforeseen implications to our waste collection services and therefore these concerns are set out below. Furthermore it is felt by AVDC's Cabinet that the approach to consultation taken by BCC in this matter undermines the potential to work collaboratively through already established partnership routes and we are concerned that we have had no opportunity to help shape influence BCC decisions, which will ultimately impact on our local communities, which we all have a shared interest in.

From the evidence presented by BCC there remains several unanswered questions and concerns that AVDC has and these will need to be addressed by BCC prior to adopting the preferred options set out in the consultation. AVDC understand that the model proposed for the HRC's has been implemented elsewhere across the country and therefore the opportunity for learning and using intelligence is there. Having sight of BCC's insight and research would be beneficial to AVDC to determine the impact and had it been provided earlier would have likely reduced the need for this letter.

The questions and concerns and set out below:

Savings Potential: It is clear that opportunities to achieve efficiencies and savings for all councils is paramount. What consideration and assessment has been made of the full quantum of costs versus saving. For example if there is an increase in flytipping as a result of day closures, this will add to AVDC's requirement to collect the waste at an increase in cost to AVDC. What assessment has BCC made of the total cost to the tax payer as a result of closing sites and levying charges.

Charging Customers for specific waste types such as rubble, plasterboard, soil etc.

BCC have presented charges as a fait accompli. However we would like to understand what assessment has been made into the impact on household waste collections. It is reasonable to expect that small amounts of waste such as soil or rubble that previously would have been take to HRC's would now be diverted to household waste bins. This waste will then enter the general waste stream and result in

potential collection issues (overloaded bins/H&S issues etc). Ultimately this waste is then sent to EfW, what does the evidence from other authorities say about this issue.

Growth and Improvements

What consideration has BCC given to the major growth in the district in the coming years particularly in and around Aylesbury when looking at the closure of Rabans lane on specific days. What is the identified saving related to this particular aspect of the proposal and how has this been modelled against growth. Buckingham HRC is well used and has previously been identified as a site that requires improvements. Again what analysis has been undertaken to relating to investment in this site, given that savings will be made elsewhere.

We trust that BCC will use the established waste partnership to discuss this important issue before the decisions on this matter are finalised.

Yours sincerely

Councillor Sir Beville Stanier Cabinet Member for Waste and Licensing

Oxfordshire County Council

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cont.

Oxfordshire County Council cont.

5. If we close one site, our preferred option would be to close Bledlow. To what extent do you agree or disagree with this option?

No preference

Strongly agree

Please circle on the scale below.

Strongly disagree

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