

Report to Cabinet

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| Title: | Proposed Household Recycling Centres (HRCs) service changes |
| Date: | 7 January 2019 |
| Date can be implemented: | 15 January 2019 |
| Author: | Cabinet Member for Planning and Environment |
| Contact officer: | Neil Gibson |
| Local members affected: | All |
| Portfolio areas affected: | All |

For press enquiries concerning this report, please contact the media office on 01296 382444

Summary

The purpose of this report is to seek approval for the updated Waste Access and Acceptance Policy (WAAP) and specific changes to the Household Recycling Centre (HRC) service. The proposed changes are designed to meet budgetary demands in the short to medium term (from financial year 2019/20 a £1.25m savings target is needed). This will help provide a more acceptable balance between Value for Money (VfM), service provision levels for an existing service contract and a new proposed service model. The new service model will be used to plan a new service contract from late 2019. Due to the completion of all the necessary legal compliances during the procurement stages, the lead in time needed to plan for a service contract change is considerable.

Buckinghamshire currently has ten HRCs, which are operated by FCC Environment through a contract¹. Benchmarking exercises undertaken by both Resource Futures (the Council's appointed technical advisors), Association for Public Service Excellence (APSE) and cost modelling (undertaken by the Council's appointed financial advisors New Networks) have all assisted in the modelling of service options.

A formal public consultation was undertaken from 28th August to 22nd October 2018. During the consultation, the Council received 6,041 responses. A summary of the analysis is covered in Section H of this report and the formal Consultation Report (CR) can be found in Appendix 1.

¹ FCC Environment contract started on 1st April 2012. Initial term expires 31st March 2019; the contract has provisions to be extended until 31st March 2022.

This report seeks to:

- set out the context of the HRC service review;
- analyse the findings of the HRC public consultation undertaken in 2018;
- identify key issues and outline the proposed solutions to these; and
- ensure the HRC service will provide a more acceptable balance between VfM, service provision in order to achieve a balanced budget position within the Council's 2019/2020 Medium Term Financial Plan (MTFP).

Recommendations

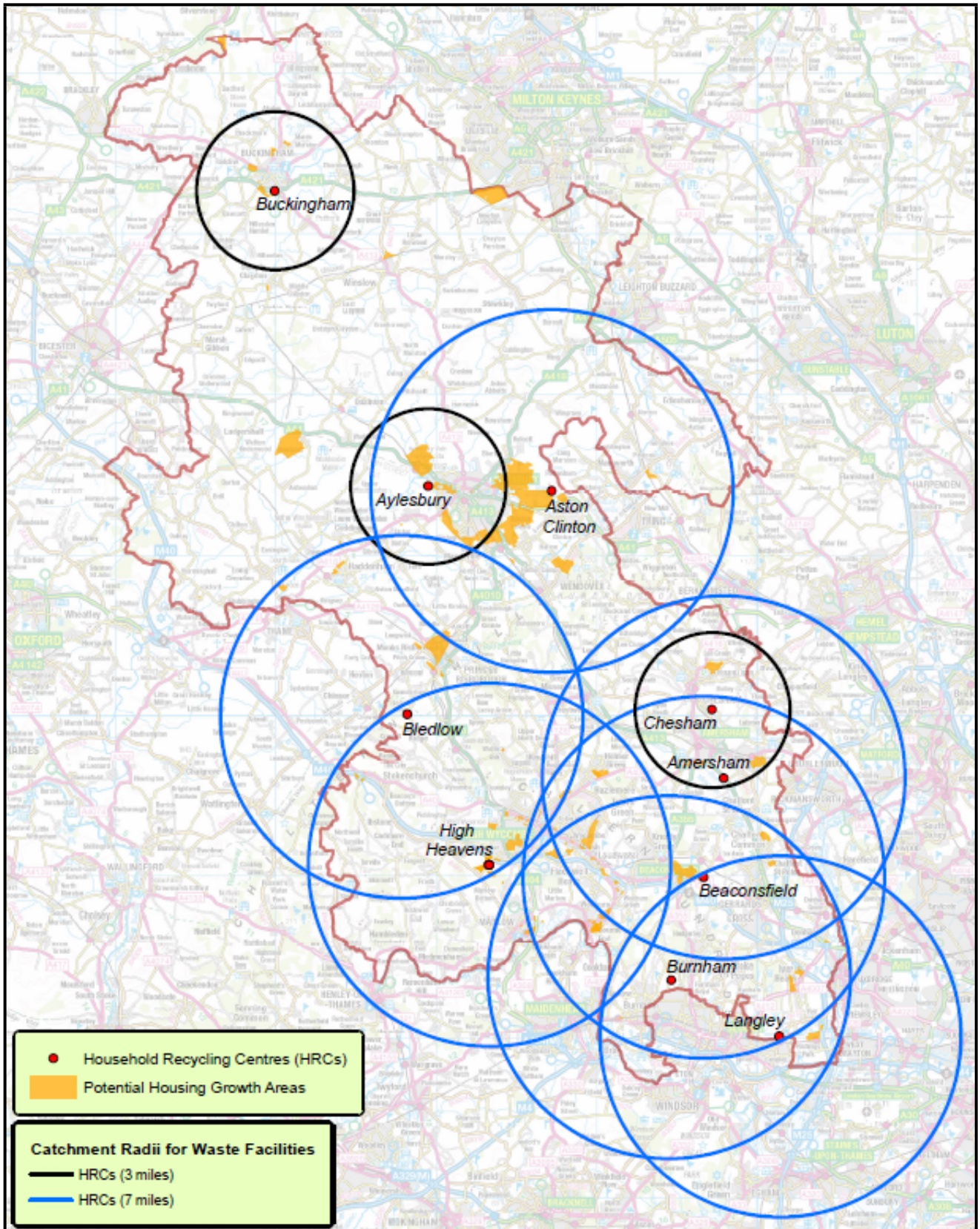
It is recommended that Cabinet approves the following recommendations to take effect from the 1st April 2019, unless otherwise stated:

- 1) Agree the revised Waste Access and Acceptance Policy (WAAP) (Appendix 2);**
- 2) Introduce charging for construction and demolition waste (also known as non-household waste) for Buckinghamshire residents and non-Buckinghamshire residents;**
- 3) Close the Rabans Lane (Aylesbury), Chesham and Burnham (during closure review period) HRCs on Wednesdays and Thursdays, reducing the opening days from 7 to 5 days a week;**
- 4) Close the Bledlow HRC and delegate authority to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment, to determine future arrangements for the site;**
- 5) Agree that based on the current financial analysis, it will be necessary to close Burnham HRC on a permanent basis on 30th September 2019, but agree that a final decision to continue with closure, or rescinding the closure, should be made in the 9th September 2019 Cabinet meeting, following a detailed financial appraisal of the other savings implemented from 1st April 2019;**
- 6) Delegate authority to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment, to maintain a service level agreement with Slough Borough Council, and enter agreement(s) with any other neighbouring authority, to share costs of operation of the HRCs on a fair basis to reflect usage;**
- 7) Agree that incidents of fly tipping should be monitored to identify whether there is an increase in activity and delegate authority to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment, to identify appropriate mitigating measures should fly tipping activity increase; and**
- 8) Delegate authority to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment, to extend the current HRC contract with FCC up to 31st March 2022 as appropriate to align with future procurement strategies and timelines.**

A. Narrative setting out the reasons for the decision

1. The HRC service supports one aim in the Council's Strategic Plan to 'Ensure Buckinghamshire is Thriving and Attractive'.
2. The Council currently has ten HRCs (Figure 1). The majority of these sites are concentrated in the south of the county, where currently there is a corresponding higher population density.
3. The Council's HRC service is provided under s.51 of the Environmental Protection Act 1990 (EPA 1990).
4. The Council is facing a challenging financial position. In order to deliver a sustainable budget for the future a HRC service review has been undertaken aiming to achieve £1.25m of savings from services that are currently provided over and above the statutory minimum requirements. The Council also wishes to continue to deliver a sustainable and customer focused waste management solution.
5. The recommendations in this report address short to medium term financial pressures. Future growth demands and the need for HRC site betterment in the medium to long term will need to be considered by the future Unitary Council.
6. The Association for Public Service Excellence (APSE) was appointed by the Council to undertake household recycling centre research and benchmarking data across local authorities during late 2017. The methodologies used were a survey and telephone interviews. A survey was issued to 175 contacts across County, Metropolitan and Unitary Authorities across England, Wales and Scotland, resulting in a response rate of 19%.
7. From the research and benchmarking exercise APSE found:
 - most local authority HRC locations are due to historical reasons;
 - some local authorities plan new facilities due to drive time and changing local needs;
 - many authorities have different winter and summer opening hours;
 - many authorities have waste restriction and vehicle controls for their HRC sites;
 - few authorities have proof of residency controls;
 - comparing the available cost information demonstrated the Council provides a low cost HRC service, that deals with higher than average waste amounts; and
 - compared to others Buckinghamshire has a high number of HRCs with extensive opening hours.
8. In conjunction with Council officers, external technical and financial advisors modelled a variety of options. To assist in the modelling of options relevant data was analysed including: drive times for residents to their nearest sites and alternatives (county-wide); haulage and waste transfer logistics; cost per tonne of running each site; possible **fly tipping** impacts; estimated savings compared to other options; number of visits; future housing growth (and ability for each site to handle this growth); legislative compliances; deliverability; traffic counters; waste tonnages and trends; service costs; benchmarking against other HRC services; industry best practice; and annual Buckinghamshire HRC customer satisfaction surveys. This list is not exhaustive, it provides an overview of the scope of information used to help inform the options considered and the recommendations being made.

Figure 1 Housing Growth and current Waste Management in Buckinghamshire – 10 HRCs



Catchment radii range is based on Waste & Resources Action Programme (WRAP) HRWC Guidance [2016].

9. **Waste Access and Acceptance Policy (WAAP)**

- 9.1. The Council's HRC Service provision is set out in the Council's HRC WAAP (Appendix 2). The policy was last revised in 2016 to reflect changes in HRC winter opening hours and the introduction of e-permits.
- 9.2. The WAAP details the following: opening days and hours; Buckinghamshire HRC users; District, Town and Parish Councils; charity and other voluntary/non-registered organisations; non-Buckinghamshire households; traders/commercial users; access criteria; banned vehicles; waste electronic-permits (e-permits); types of e-permit waste; acceptance criteria; declaration and records; and General Data Protection Regulations.
- 9.3. The WAAP has been updated to reflect the proposed recommendations in this report, aligned with other waste policies and Government guidance. In summary the draft policy includes the following appendices:
 - Control of vehicles accessing HRCs – remains
 - District Councils' use of designated HRCs – remains
 - Vehicle restrictions and acceptance of some waste types at specific sites – remains
 - Charging for some types of waste, including construction and demolition waste (also known as non-household), entering HRCs – new
 - Controls for cross border use to be managed part through direct administrative arrangements with neighbouring local authorities and part through the charging of non-household waste – updated
 - Charities / Parish Council restrictions – updated
 - Weekday planned closures for some sites – new
- 9.4. The Government has very recently published its updated Resources and Waste Strategy, which continues to focus on waste prevention, reduction and recycling. The WAAP will be subject to review, which will take account of legislative changes.

10. **Charging for construction and demolition (also known as non-household) waste**

- 10.1. The Council is able to charge for materials not classified as household waste. The Council is permitted to do this under the EPA 1990 and Controlled Waste (England and Wales) Regulations 2012 (CWR 2012). Charges can only be made for waste deposited by Buckinghamshire residents where these are not classified as household waste – see point 10.3. This includes waste resulting from construction and demolition work. Regulation is clear that Councils cannot charge for the disposal of household waste, including garden waste.
- 10.2. A list of materials and the appropriate charges are contained within the WAAP (Appendix 2) and summarised in Table 1 below:

Table 1 Chargeable waste types and their cost

| Waste Type | Cost per 25 Litre bag (£) | Cost per Item (£) |
|--|---------------------------|--|
| Asbestos (construction and demolition) | £12.00 | £3.50 per sheet 1mx1m |
| Tyres | N/A | £4.00 per tyre |
| Soil and Hardcore◆ | £2.50 | N/A |
| Plasterboard | £6.00 | £7.00 per sheet 2m x 1m |
| Chargeable wood / MDF▲ | £2.50 | £10.00 per equivalent size to a door 2m x 1m |

◆ Includes soil from landscaping activities, any other building materials (e.g. bathroom suites) and chargeable ceramics - bathroom / kitchen tiles, floor tiles etc.

Free of charge ceramics (household waste) includes kitchenware dishes etc.

▲ Chargeable wood / MDF includes doors, decking, window frames, fence panels, sheds, fitted kitchen units etc.

Free of charge wood (household waste) includes chairs, tables, furniture, free standing units and cabinets, wardrobes etc.

- 10.3. Charging for construction and demolition waste enables the Council to maximise the opportunity in reaching the savings target and continue to manage associated risks of further HRC site closures. It is recommended that charges are introduced for non-household waste for all customers irrespective of being Buckinghamshire or non-Buckinghamshire residents.
- 10.4. Charges for construction and demolition waste have been considered against whole system costs (e.g. haulage, treatment, disposal, site management costs), as well as analysis of charging models employed at authorities already charging for specific

waste streams. Examples of other authorities already charging are West Berkshire, Oxfordshire, Norfolk, Suffolk, Bracknell Forest, Reading Borough and Wokingham Borough Councils (RE3).

11. **Weekday Closures**

- 11.1. It is recommended that three HRCs (Rabans Lane [Aylesbury], Chesham and Burnham²) are to provide a five day service, closing two consecutive days during the week. The planned closure days are proposed to be Wednesday and Thursday due to operational service delivery needs. Six HRCs are proposed to remain a seven day service, these being Aston Clinton, Buckingham, High Heavens, Beaconsfield, Amersham and Langley. This allows for nearby alternative site(s) to be open and provide a seven day service.
- 11.2. A range of factors were considered when assessing weekday closures including: the consultation responses; Equality Impact Assessment (EIA), see Appendix 3; legal duties; and travel times to alternative nearby sites which can accommodate the waste volumes, capacity and visitor numbers.

12. **Closure of sites**

- 12.1. Historically HRCs have evolved over time, not necessarily due to spatial planning considerations and, particularly in the South of the county, have been influenced by historic county boundaries. Table 2 provides an overview of all HRCs.
- 12.2. Bledlow has the fewest visitors of all HRCs, it is one of the most remote sites in the service, is one of the most expensive to run due to lower waste volumes and has nearby HRCs as alternatives. It is recommended that this site is closed first.
- 12.3. Slough Borough Council provides a contribution payment towards Burnham HRC running costs. There should be a deferred closure of Burnham HRC for a period of up to six months, an indicative date 30th September 2019, to allow for a financial appraisal to be undertaken of other service changes contained within this report.
- 12.4. Based on usage and population data, the proposed eight HRC network meets the needs of the current population and takes account of future short to medium term planned housing growth. Figure 2 shows that the eight HRC network model continues to provide a high density of HRC coverage in the south of the county and has the least impact on the majority of residents. The recommendations in this report address short to medium term financial pressures.
- 12.5. The Council recognises that alternative proposals to run the site(s) may be submitted by the third sector or other interested parties. The Council will consider these proposals but is unable to provide financial assistance/resource. These proposals would also be considered in line with section E of this report.
- 12.6. The long term growth demands and betterment for the HRC service is suggested to be planned for by the future Unitary Council.

² 5 month site closure deferral – refer to recommendation 5

Table 2 Summary of BCC HRC sites

| HRC | Visits per year (2017/18) | Site overview | Percentage of households closest to each BCC HRC ³ | Planned week day closures (Yes / No) | Key comments |
|----------------------|---------------------------|---|---|--------------------------------------|--|
| Amersham | 161,000 | Site layout allows vehicles to enter and exit separately. Primary road. | 13.8% | No | Historic site. Accepts fly-tipped waste from Chiltern District Council for efficient waste management. Offers a commercial weighbridge to accept waste from traders for a charge. 4 miles from Chesham HRC. If closed, the impact on Chesham and Beaconsfield (on both visitor numbers and waste volumes) would be challenging to manage. |
| Aston Clinton | 260,000 | Internal site is a one-way traffic design. Has a large area for residents to park and tip their waste. Principle road. | 10.4% | No | Modern, purpose built site (opened in 2009). Accepts fly-tipped and 75% of kerbside green waste from Aylesbury Vale District Council for efficient waste management. Offers a commercial weighbridge to accept waste from traders for a charge. Has a charity run re-use shop. Along with Beaconsfield and High Wycombe sites shows how effective modern household recycling centres can be. |
| Beaconsfield | 240,000 | Full one-way system. Principle road. | 13.4% | No | Modern, purpose built site (opened in 2007). Accepts fly-tipped waste from South Bucks District Council for efficient waste management. Offers a commercial weighbridge to accept waste from traders for a charge. Surrounding HRC sites could not absorb both visitor numbers and waste volumes if Beaconsfield was to close. Along with Aston Clinton and High Wycombe sites shows how effective modern household recycling centres can be. |
| Bledlow | 97,000 | Small site with a narrow entrance. Traffic crosses when entering or exiting the site. Unclassified road. | 5.4% | Complete closure recommended | Historic site near the border with Oxfordshire. Nearest town is Princes Risborough. It has the fewest visitors of all the sites, 32% of which are from Oxfordshire. Bledlow is one of the most remote sites in the service, and one of the most expensive to run. Travel time from Bledlow HRC to the nearest alternative site (High Heavens), if Bledlow were to close is 16-20 mins. Residents in Princes Risborough (largest town nearby) = 10-14 min to Aston Clinton. Typical times – Average of Google estimated times, taken each day of the week at 10am & 2pm. |
| Buckingham | 107,000 | Small site with a narrow entrance. Unclassified industrial area road. | 8.3% | No | Historic site, serving part of the north of the county. In a light industrial estate on the outskirts of the town. One of the most expensive sites to run. Closing the site would give residents in North Bucks around 35min extra journey time, above the recommended maximum of 30min in a rural area. |

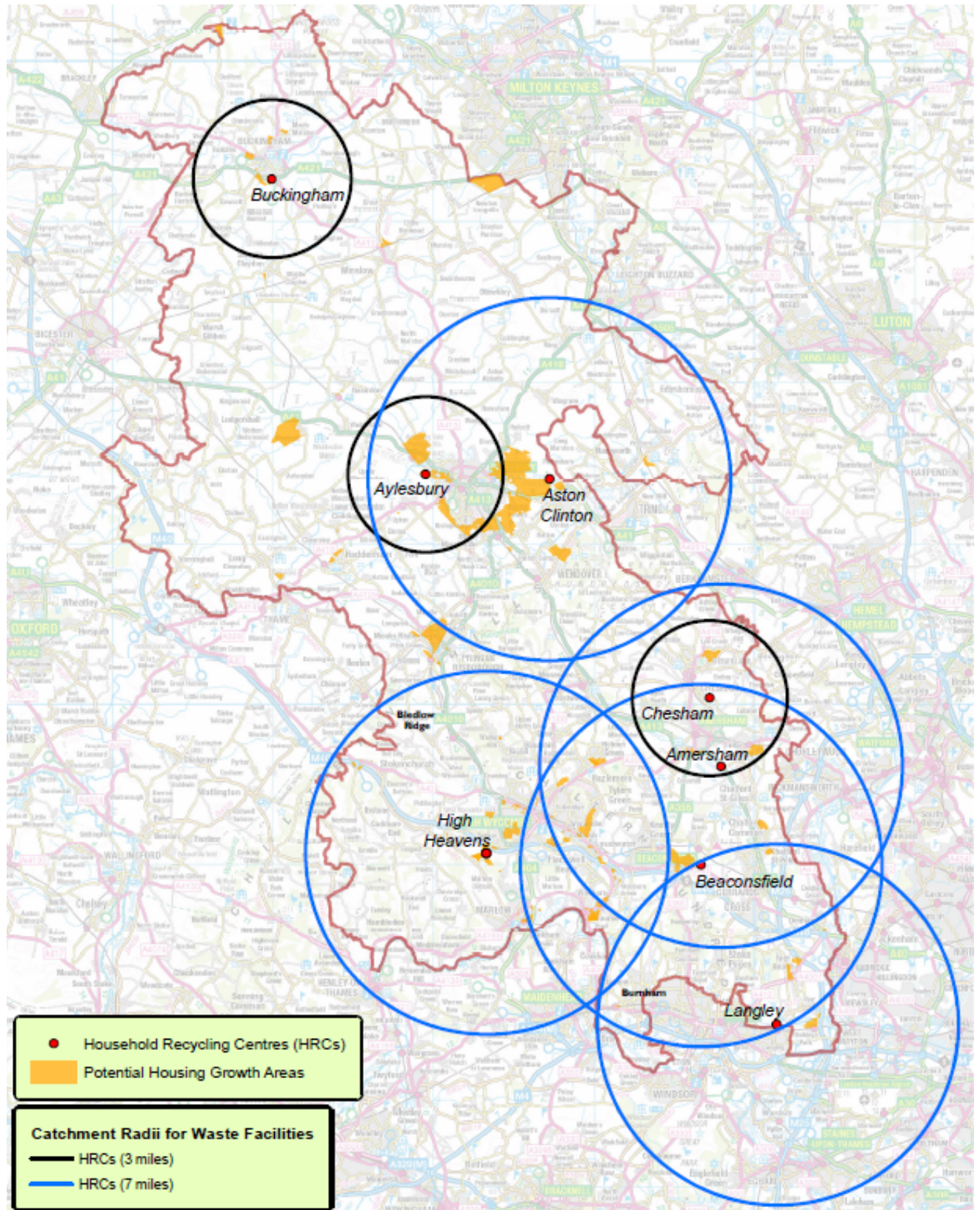
³ Remaining 5.7% is external to Buckinghamshire.

Summary of BCC HRC sites continued

| HRC | Visits per year (2017/18) | Site overview | Percentage of households closest to each BCC HRC ⁴ | Planned week day closures (Yes / No) | Key comments |
|--------------------------------|---------------------------|--|---|--------------------------------------|--|
| Burnham | 116,000 | Site layout means residents tip waste on the lower level. The exit route is for all vehicles, so site operations sometime lead to halting the public whilst compaction takes place. Unclassified road. | 5.41% | Complete closure recommended | Near Buckinghamshire/Slough border. Historical site also serving Slough residents. Slough Borough Council pays a contribution towards costs for their residents. Similar visitor numbers to Buckingham and Bledlow. Travel time from Burnham HRC to alternative sites, if Burnham were to close: <ul style="list-style-type: none"> • Beaconsfield = 10-14 min • Langley = 16-22 min Typical times – Average of Google estimated times, taken each day of the week at 10am & 2pm. |
| Chesham | 162,000 | Has one way traffic system for residents. Operational traffic is kept separate and as a split level site, residents can tip waste on upper and lower levels. Unclassified road and weight restrictions around area. | 6.6% | Yes | Shares an entrance with a scrap metal firm. East of Chesham town centre. If this site was to permanently close the amount of waste and visits could not be easily absorbed by the nearest site, Amersham. |
| High Wycombe | 276,000 | Has one way traffic system for residents. Operational traffic is kept separate and as a split level site, making it easier for residents to tip waste. Minor B road. | 16.2% | No | Built in 2009. Modern site located on High Heavens waste management complex, shares recently widened access road with heavy goods vehicles using the other complex facilities. Site benefits from split level design keeping operational and public areas separate. Has re-use shop with parking. Along with Aston Clinton and Beaconsfield sites shows how effective modern household recycling centres can be. |
| Langley | 188,000 | The site is a split level site, with extended upper level, making it easier for residents to tip waste. Minor B road. | 3.3% | No | Langley sees a lot of visitors from Slough, which Slough Borough Council pays a contribution towards costs for their residents. It is easily accessible to the main road and the M4 for onward waste transportation. It has around 70,000 more visitors than Burnham. |
| Rabans Lane (Aylesbury) | 214,000 | Not large enough to support a one-way system. Traffic does not cross when entering or exiting the site, but does when parking to tip waste. Unclassified industrial area road. | 17.2% | Yes | Historic site, north-west of the town centre and serves Aylesbury and surrounding towns/villages. Offers a commercial weighbridge to accept waste from traders for a charge. Less busy during weekdays. Pressure on this site – move demand to Aston Clinton. |

⁴ Remaining 5.7% is external to Buckinghamshire.

Figure 2 An eight site HRC network distribution model and potential future household growth



Catchment radii range is based on Waste & Resources Action Programme (WRAP) HRWC Guidance [2016]

12.7. Based on the extensive options modelling undertaken, Bledlow and Burnham HRCs were identified to have the least impact on residents and the service as a whole, if these sites were to close. With an eight site model, Buckinghamshire will remain above the national average (1.3 HRCs per 100,000 residents) with 1.5 HRCs per 100,000 residents. See Table 3 below.

Table 3 Impacts of eight and nine site models

| | Reduce to nine sites | Reduce to eight sites |
|----------------------------------|---|--|
| Proposed site(s) to close | Bledlow | Bledlow & Burnham |
| Positive impacts | <ul style="list-style-type: none"> • Alternative sites are modern and have re-use shops • Less HGV traffic in nearby villages | <ul style="list-style-type: none"> • Alternative sites are modern and have re-use shops • Less HGV traffic in nearby villages • Extra saving meets current target |
| Negative Impacts | <ul style="list-style-type: none"> • Further to travel for some residents • Limited savings may require further service changes in the future | <ul style="list-style-type: none"> • Further to travel for some residents |

12.8. With an eight site model, 97% of Buckinghamshire households live within 20 minutes of an HRC. For further details regarding drive time distribution for eight sites (assuming Bledlow and Burnham are closed) see Table 4 below and Figure 3. Drive time was calculated using the current road network and assumes that householders use the site which is closest in terms of driving time.

Table 4 Drive time distribution for an eight site network assumption (assuming Bledlow and Burnham are closed)

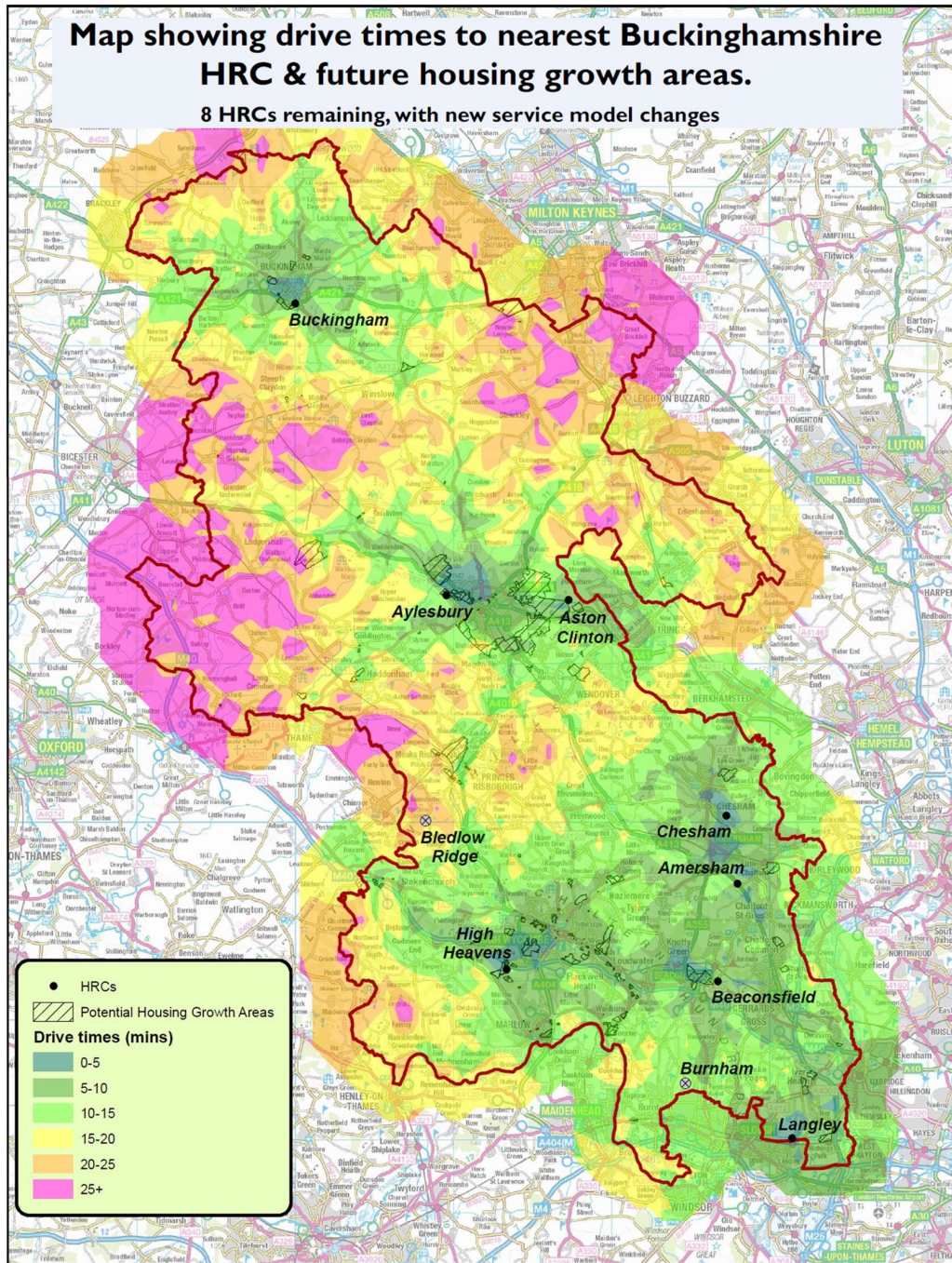
| Drive time | Number of households | % |
|------------------------|-----------------------------|-------------|
| 0 - 5 minutes | 18,912 | 9% |
| 5 - 10 minutes | 88,053 | 42% |
| 10 - 15 minutes | 72,298 | 35% |
| 15 - 20 minutes | 22,516 | 11% |
| 20 - 25 minutes | 5,381 | 2% |
| 25 + minutes | 1,797 | 1% |
| Total | 208,957 | 100% |

13. Cross Border usage

13.1. The Council recognises that, in some locations, the network of Buckinghamshire HRCs is more convenient for non-Buckinghamshire residents to access compared to similar facilities within their own administrative area. The Council is not encouraging “out of area” users to use its centres. Restricting non-Buckinghamshire users would introduce inconvenience to Buckinghamshire residents (for example there may be

increased queuing whilst waiting for residency checks) and introduce additional cost in the short term (see Section B for further information). Therefore the recommendation proposes to introduce charges to non-Buckinghamshire residents, in accordance with powers set out in Paragraph 51(3) of the EPA 1990, rather than prohibit use of the HRC amenities. The Council currently has an arrangement with Slough Borough Council to share the costs of HRCs within Buckinghamshire which are used by Slough residents. The recommendation delegates authority to the Environment Services Director to maintain a service level agreement with Slough Borough Council and enter into agreement(s) with any other neighbouring authority to share the costs of HRCs within the Buckinghamshire area.

Figure 3 An eight site HRC network distribution model showing drive times and future housing growth



14. HRC service contract extension

- 14.1. As mentioned earlier in this report APSE has undertaken a benchmarking exercise which shows that the Council provides a low cost HRC service. For further details please refer to the background paper HRC Technical summary and modelling methods, with associated appendices.
- 14.2. As part of this review the current contract was also considered with external advisors. The current HRC service contract is operated by FCC Environment. The initial term of the contract is seven years, commenced on the 1st April 2012 until 31st March 2019. The contract has provisions to extend for a further three years up to 31st March 2022. A number of options were assessed, for example procurement of a new service contract, value for money assessment for delivering service changes as proposed in this report under the current contract and other service delivery options. The recommendation is, through negotiation, to extend the current HRC contract with FCC Environment beyond the initial contract expiry date, and to implement the

proposed service changes set out in this report. This option represents value for money as well as stability during the modernising local government (unitary) period. It is recommended that the extension of the current HRC contract with FCC is delegated to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment. This extension, up to the 31st March 2022, is as appropriate to align with future procurement and to procure a new contractor.

B. Other options available, and their pros and cons

15. **Do nothing** – the current service provision is not affordable against wider Council priorities and budget constraints. The ‘do nothing’ option is not recommended, as a public body the Council is required to balance its budgets.
16. **Do minimum** – the Council could make further reductions to the HRC network, including restricting access for non-residents of Buckinghamshire and reducing the network further, however as this option does not support the Council’s strategic plan to “Ensure Buckinghamshire is Thriving and Attractive”, the option was not put forward for public consultation.

17. Alternative options

- 17.1. Consultation responses suggested that the Council look at reducing opening hours or days across all sites, to avoid closing sites completely. These options were considered in earlier options modelling and were discounted, but are detailed below. These alternatives still include charging for construction and demolition waste:

- If the Council were to reduce the opening days to meet the necessary savings, seven sites would need to have their opening days reduced from seven days a week to five.
- If the Council were to reduce opening hours to meet the necessary savings, all ten sites would have to reduce their opening hours by two hours every day, including weekends, all year.

Both of the options above represent a wider impact across the network as whole compared to site closures. For example, 112 hours a week would be lost if Bledlow and Burnham sites were to close, however this increases to 140 hours a week with the reduction in opening hours as described above. Bledlow and Burnham are the nearest sites for around 10% of Buckinghamshire residents, and these residents are likely to be affected by site closures. All residents of Buckinghamshire however, would be affected by closing all sites by 2 hours each day and a significant majority would be affected if seven sites were to move to five days a week (348,000 visits affected per annum). The Council appreciates the impact on users of Bledlow and Burnham of site closures (213,000 visits affected per annum), but feels the wider impact of the above alternatives is large in comparison. There would be an additional 135,000 visits per annum affected by reducing hours across all HRCs compared to two proposed site closures (Bledlow and Burnham).

The operational aspects of the above alternatives should also be considered. District Councils, commercial users and the site operator access the site during operational hours. Reductions across the network would affect bulky waste and garden waste collections by the District Councils, traders being able to dispose of waste and the contractor’s site management and operations. These issues do not arise with the recommended option of the proposed two site closures (Bledlow and Burnham).

- 17.2. Another alternative is to introduce a Buckinghamshire only policy for all HRC sites, restricting out of county residents from accessing Buckinghamshire HRCs. This is

not recommended at present due to the high implementation costs and inconvenience introduced to Buckinghamshire residents compared to relatively low revenue recovery. See Table 5 below. Concern for this option was also raised in the consultation, with the opinion that non-Buckinghamshire residents may fly tip their waste if their access is restricted.

Table 5 Potential non-Buckinghamshire charging solutions

| Non-Buckinghamshire charging solution | Initial cost 1 st Year | Ongoing Per annum | Estimated income from non-Buckinghamshire residents per annum | Net saving |
|---------------------------------------|-----------------------------------|-------------------|---|--|
| Printed permit (e.g. National Trust) | £170k | £170k | - £180k | £10k per annum saving |
| Digital solution [▲] | from £420k | £TBC | - £180k | £240k 1 st year cost c. £180k per annum saving subsequent years |
| 'Do nothing' [●] | N / A | N / A | £0 | £0 |

▲ Digital solution (from £420k year 1) would not be delivered within the first year due to implementation timescales. Printed permit solution (£170k) or 'do nothing' option would be needed to run 2019/20. Note: does not include overhaul/replacement of existing ageing ANPR system.

- Non-Buckinghamshire residents would still be charged for non-household waste.

C. Resource implications

- The current total service cost is c. £3m for managing multiple waste streams through the HRC network and from 2019/20 the cost is c. £3.75m. For the financial year 2019/20 a £1.25m savings target is needed.
- The financial modelling that has been undertaken, in order to achieve the aforementioned savings, provides a projection in relation to the savings the Council could make through the recommended changes to the HRC Service. There are some key assumptions regarding charging for construction and demolition waste (non household):
 - The amount of this type of waste which attracts a charge;
 - Some waste will continue to find its way into the HRC network and/or disposal costs; and
 - The amount of waste, which will no longer be disposed of within the HRC network, finds legitimate, alternative routes such as skip hire, skip bags etc.
- The inclusion of charging for construction and demolition waste helps the Council to maintain high network coverage and defer a second site closure for at least five months (Burnham). This will enable in-year monitoring and tracking of the HRC service changes to ensure the savings target is on track to be achieved. If the savings target cannot be achieved Burnham HRC would need to close.
- Table 6 shows the planned savings from the three options, demonstrating that Option 3 is most likely to deliver the needed savings.
- The recommended service changes (as set on page 2) are anticipated to generate an overall revenue saving of c. £1.25m, which is in line with the savings required in order to achieve a balanced budget position within the Council's 2019/2020 Medium

Term Financial Plan (MTFP). It is assumed that the charges proposed are outside the scope of VAT.

23. In the 2015/16 MTFP a £160,000 cost of change budget was approved for year 2018/19. Following the key concerns raised through the consultation (for more information see point 35.2) some additional fly tipping bolstering activities are recommended c. £63,000 pa, to be reviewed as part of future MTFP proposals from 2019/20 onwards. Consisting of:

- Additional cameras, signage, SCRAP leaflets etc. = £6,700;
- Resource: Regrade of assistant enforcement officer (R2 to R4) = £6,100; and
- An interim HRC enforcement officer appointed directly into the Waste Management service and aligned to the HRC service changes c. £50,000.

Table 6 Financial implications of potential service models

| Service Change Measures (Implementation from April 2019, subject to approval) | Option 1 (10 sites) | Option 2 (9 sites) | Option 3 (8 sites) |
|--|--|---|------------------------------|
| Network rationalisation | N/A | £158k (Bledlow) | £380k (Bledlow & Burnham) |
| Construction and Demolition Waste Charging for <u>all</u> customers, including Buckinghamshire residents e.g. rubble, soil, asbestos, plasterboard, tyres, kitchen cupboards, baths etc. <i>Removes the current limits of accepting some waste streams free of charge.</i> <i>Note: Modelling the income generated by charging for construction and demolition waste is extremely complex due to variables of waste movements in the event of site closures. These figures have been produced by taking in to account such variables.</i> | £750K - £850K | £750K - £815K | £700K- £900K |
| Reduced Opening Days – Rabans Lane (Aylesbury) and Chesham, and Burnham (option 1&2) 6 sites (Aston Clinton, Buckingham, High Heavens, Beaconsfield, Amersham, Langley) to open 7 days in all options. Other sites to open 5 days a week (number of sites depends on option taken). | £110K | £110k | £80k |
| Total Opportunity Range (per annum) | £860K - £960K | £1.018M - £1.307M | £1.21M - £1.36M |
| Risk related to achieving the necessary savings as a result of waste volumetrics (customer behaviour, market conditions) | HIGH | MEDIUM | LOW |
| Do measures achieve the annual £1.25m savings needed? | No Risk of a shortfall c. £300k - £400k | Potentially Risk of a shortfall c. £232K if income assumptions are not met | Yes |

D. Value for Money (VfM) Self-Assessment

24. The financial efficiencies achieved following the implementation of the proposed service changes would enable the Council to meet the identified financial pressures. The recommendations will provide a more acceptable balance between VfM and service provision levels, compared with alternative options.

E. Legal implications

25. The Council's HRC service is provided under the EPA 1990. Section 51 requires the WDA to arrange for places to be provided at which residents may deposit household waste and for the disposal of any waste deposited. The arrangements should secure that each place is:
- (a) situated within the area or so as to be reasonably accessible to persons resident in its area;
 - (b) available at all reasonable times (including at least one period on the Saturday or following day or each week, except the 25th December or 1st January); and
 - (c) available for the deposit of waste free of charge by residents.
- However, the arrangements may restrict the availability of specified places to specified descriptions of waste.
26. The WDA may also include arrangements for the HRCs provided under s.51 to be available for the deposit of household or other controlled waste by other persons on such terms as to payment (if any) as the authority determines.
27. Household waste is defined in the Controlled Waste (England and Wales) Regulations 2012. Construction and demolition waste is defined as industrial waste, regardless of whether it is produced from domestic premises or not.
28. The Local Authorities (Prohibition of Charging Residents to Deposit Household Waste) Order 2015 prohibits WDAs from charging its own residents to enter into, or exit from, a HRC or deposit household waste at a HRC.
29. Legal implications have been considered please refer to the WAAP in Appendix 2 for further details.

F. Property implications

30. The Council's estate is managed through the Corporate Landlord function. The recommended move to an 8 site model is in line with the Council's aim of maximising the value for money delivered from the Council's Property assets. Depending on the decisions taken, there will be an implication for the Council's Estate which will be considered separately. Any benefit from the release of assets has not been factored into the financial implications above.

G. Other implications/issues

31. An Equality Impact Assessment (EIA) has been undertaken, see Appendix 3 for more details.
32. The EIA sets out the evidence of potential impacts of the proposed changes on the nine protected factors. There is some evidence that persons over 65 years are more likely to use the HRCs than other age groups and are more concerned about increased travel times. The Council plans to robustly communicate the changes and details of alternative HRCs.

H. Feedback from Consultation, Local Area Forums and Local Member views

33. The HRC service consultation took place from 28th August to 22nd October 2018. A summary of key figures related to the consultation are:

- 6,041 responses were received;
- 18 public events were held (755 residents attended events); and
- A petition signed by over 4,000 people was received opposing Bledlow site closure.

34. Charging Buckinghamshire residents for construction and demolition (non-household) waste was presented as a requirement for any service change to help achieve the savings. The options modelling and benchmarking undertaken prior to the consultation showed that the alternative would be for more permanent HRC site closures to meet the necessary savings. Through internal governance processes the Council had already provided a desired aspiration that a high HRC network coverage was important.

35. Consultation Analysis

35.1. The consultation received a significant amount of interest and was widely promoted, leading to a very strong response rate to the official survey, public events and online supporting information. A detailed analysis is available in the Consultation Report (Appendix 1). The key themes raised in the consultation are set out below. These themes have been considered and the Council's response is contained in the bullet points below.

35.2. There is a clear view that any change to HRCs will have a negative impact on **fly tipping**, which is seen as a big problem already in Buckinghamshire. Respondents see the proposed changes as detrimental to the local and wider environment. Residents considered the costs of clearing fly tipping to be much higher than the reality and as such assume any savings made may not be realised after the assumed increase in fly tipping. Respondents expressed this opinion whether discussing weekday closures, site closures, charging for some types of waste or restricting non-Buckinghamshire users.

- The Council recognises the strength of residents' feelings about fly tipping, and this has been considered. The Council is clear that there is no evidence of changes to HRCs leading to an increase in fly tipping. The recommendation is to monitor fly tipping incidents to identify whether there has been an increase and to delegate authority to the Environment Services Director to make a decision on any appropriate mitigating measures that should be taken in response to this. The Council will have a comprehensive communications campaign in relation to the changes to the HRC service and this will be run in parallel to the successful SCRAP fly tipping prevention campaign (see section C for costs). Active monitoring of fly tipping incidents will also continue.
- It should be noted the Council meets the fly tipping enforcement team overhead costs or c. £200,000 per annum. Each District Council contributes c. £20,000 per annum towards Waste Partnership fly tipping activities. The fly tipped waste collected by the District Councils is presented to the Council, as the WDA, for treatment and disposal. The District Councils also already utilise designated HRC sites to deliver fly tipped, bulky waste or other difficult waste streams to help manage costs and achieve sustainable waste management solutions.
- The Council has a zero tolerance stance on fly tipping. In Buckinghamshire 1 in 38 cases result in a successful prosecution compared to the national average of 1 in 638.

35.3. There is a clear understanding of the need to save money, but analysis of comments suggest, many respondents are willing to pay more and/or want the Council to find the money from other sources.

- The Council cannot legally charge residents for entering and exiting HRCs and has legal obligations to accept household waste.
- The current financial pressures highlight the Council must balance its budgets.

35.4. Possible HRC closures were the main focus of the consultation responses, and as such many comments were framed through possible HRC closures. Residents would prefer no reductions in the service as it stands, and see site closures as a last resort. Those who use the Bledlow and Burnham HRCs are strongly against possible closures. These respondents expressed the need to look at other options (specifically the options of reducing opening hours or days across the network to avoid the need for complete site closures).

- The Council's extensive modelling work looked at many different alternatives to closing HRCs. The alternatives needed to meet the savings required and keeping all ten sites open would not represent a suitable service for residents across Buckinghamshire. Please see Section B for further detail regarding alternative options.

35.5. Residents have expressed mixed views on whether to charge non-Buckinghamshire residents or to do nothing. However, there is a clear theme that those wishing to charge suggest any income should help fund the existing service.

- The Council is not encouraging "out of area" residents to use its centres as opposed to centres available in "their own area". Where centres are located close to administrative boundaries, residents are likely to use the closest centre, rather than take account of administrative boundaries. The Council currently works with neighbouring authorities to find a suitable way forward to cross border use. This includes financial contributions and in-kind arrangements. The recommendation is at present that the Council moves forward with charging for construction and demolition (non-household) waste for non-Buckinghamshire residents. The situation will be monitored and if the savings needed are not being realised alternative arrangements will be considered for non-Buckinghamshire users.

35.6. There is no preference on which week days to close some sites. However, a deeper analysis shows there may be some support for closures on consecutive days.

- As there is no clear preference, even with those residents who visit sites that may be affected, therefore due to service operational needs, it is recommended that Wednesdays and Thursdays are the two days for planned weekday closures for Rabans Lane (Aylesbury), Chesham and Burnham.

35.7. Residents in general oppose charging for some types of waste. This opinion does soften when the scale of savings is explained and the detail of what wastes can be charged for. However, residents' perception is that charging for some types of waste as a policy would be difficult to implement and sends out the wrong message about recycling.

- The scale of savings needed means the HRC service model needs to change. Whilst the Council acknowledges residents' concerns, introducing charges for some waste helps the Council manage the risk of further HRC closures.
- The Council will continue to work with other Local Authorities who have implemented similar service changes which have been set out in this report.
- An extensive communications campaign is planned to ensure that any service changes are communicated through a range of channels.

35.8. Wider impacts on residents and the local environment are very important to respondents. The additional travel times to alternative sites are deemed by many to

be too far and make recycling harder. The same journeys are believed to have an increased detrimental impact on air quality and CO₂ emissions.

- The Council appreciates that some users will have further to travel due to the proposed changes. The actual increase in travel times is individual to each visitor and cannot be realistically modelled as a significant number of customers undertake combined journeys. The travel times for all residents to access their nearest HRC are shown in Table 4 and Figure 3.
- The Council attempted to model the possible impact on CO₂ emissions due to the proposed changes. However, a robust analysis was not achievable due to combined journeys and patterns which individuals make. An estimate was shared by the elected Member for The Risboroughs area during the consultation. The CO₂ emissions estimate relied on assumptions that all journeys were single purpose and from Princesses Risborough to Bledlow HRC. The Council has considered the two assumptions made and is not confident there is any evidential basis. However, if this estimate were used it would indicate an increase of approximately 0.02% of both the total miles travelled and CO₂ emissions produced in Buckinghamshire each year as a result of closing Bledlow. Therefore based on this estimate the CO₂ impact is considered low.

35.9. Elected Members for Ridgeway West and The Risboroughs, areas closest to Bledlow HRC, are unsupportive of the proposed HRC closure and organised a petition.

35.10. Both local communities affected by possible closures made clear their opposition to closures. The Council understands that any site closure is a reduction in service. The Council believes the least worst option for two sites to close would be Bledlow and Burnham HRCs, given the likely impacts on other areas if other HRCs were to close. Sixteen organisations officially responded to the consultation, detailed in Section 9 of the Consultation Report (Appendix 1). All but three were Councils, (Parish, Town, District or County) responding on behalf of their residents. Many organisations expressed concern regarding the possible impact fly tipping may have on their local community. Those organisations affected by possible site closures or reductions in weekday opening stated their concern about residents having to drive further across the county, increasing traffic and pollution. All four District Councils in Buckinghamshire responded to the consultation, expressing their concern that the potential impacts on collection authorities had not been considered, and changes could affect their budgets and service provision. Chiltern, Wycombe and South Bucks Districts objected to any site closures or reduced hours and charging for some types of waste, citing possible fly tipping impacts, convenience of residents, environmental impacts and overall cost to their local tax payers. Councils from Neighbouring authorities were broadly supportive of the overall aims. They made clear that they would be concerned if any changes were to impact their residents.

- The use of the HRC network by external organisations was considered when making the recommendations, for example the District Councils' use of the HRC network to deliver waste. The Council recognises the strength of feeling regarding fly tipping and this has been considered (see bullet points in section 35.2).

35.11. For further details regarding the Consultation, including consultation responses, please refer to the Consultation Report in Appendix 1.

I. Communication issues

36. The outcome of the decisions will be extensively communicated. A high level communications plan is being developed and will be completed with detailed methods of engagement as soon as implementation plans are finalised (post decision). Stakeholders will be engaged once a decision is made. Stakeholders include:

- Residents
- Parish, Town, District & County Councils and elected Members
- BCC Teams – Waste, Customer Services, Business Support, Communications, Libraries
- FCC Environment
- Local Media
- Bucks Business First
- Neighbouring Local Authorities

J. Progress Monitoring

37. If the HRC Service review recommendations are adopted then the service will monitor the programme and report progress through the Council's governance processes.

K. Review

38. The WAAP policy will be kept under review and any review will take account of legislative change.

39. It is proposed to close the Burnham HRC on Wednesdays and Thursdays from 1st April 2019 and close it permanently on an indicative date of 30th September 2019 and delegate authority to the Environment Services Director, following consultation with the Cabinet Member for Planning and Environment, to determine the effective date for closure following a financial appraisal on the other savings implemented from 1st April 2019.

Abbreviations

APSE – Association for Public Service Excellence
CR – Consultation Report
CWR 2012 – Controlled Waste (England and Wales) Regulations 2012
EIA – Equality Impact Assessment
EPA 1990 – Environmental Protection Act 1990
HRC – Household Recycling Centre
MTFP – Medium Term Financial Planning
VfM – Value for Money
WAAP - Waste Access and Acceptance Policy
WDA - Waste Disposal Authority
WR 2011 – Waste (England and Wales) Regulations 2011
WRAP – Waste & Resources Action Programme

Appendices

Appendix 1 – Consultation Report (CR) & associated appendices

Appendix 2 – Waste Access and Acceptance Policy (WAAP)

Appendix 3 – Equalities Impact Assessment (EIA)

Background Papers

1. HRC Technical summary & modelling methods & associated appendices. Available on request (by emailing democracy@buckscc.gov.uk).
2. Full list of all free text comments received during the consultation. Available on request (by emailing democracy@buckscc.gov.uk).

Your questions and views

If you have any questions about the matters contained in this paper please get in touch with the Contact Officer whose telephone number is given at the head of the paper.

If you have any views on this paper that you would like the Cabinet Member to consider, or if you wish to object to the proposed decision, please inform the Democratic Services Team by 5.00pm on 4 January 2019. This can be done by telephone (to 01296 382343 or e-mail to democracy@buckscc.gov.uk)