

Wiltshire Council

Cabinet

9 October 2018

Comments and Responses

Colin Gale - Pewsey Community Area Partnership (PCAP), Campaign to Protect Rural England (CPRE) and Pewsey Parish Council (PPC) memorandum to Cabinet which counters the claimed financial savings re the proposed closure of Everleigh HRC

Note: Council responses in bold text.

Introduction

Ever since the public meeting held at the Tidworth Garrison Theatre on 21st December 2015, Wiltshire Council's (WC) consistent view of Everleigh, repeated on many occasions, has been that it has been one of the "least efficient" HRC's owned by the Council (for example, the previous Cabinet Member for Waste's public e-mail 10th Feb 2016) or "the least used" (for example, WC Press release 12th June 2018 and the present Cabinet Member for Waste's comments in the Gazette & Herald on 2nd August 2018) and that, according to the information accompanying the recent public consultation to close the site, closure would save annual operating costs of £100,000 and revenue costs of £43,000,

PCAP/PPC/CPRE acknowledge that, prima facie, there is indeed statistical evidence that the site is the least used of the eleven Council owned sites, but submits that to close it on this ground, or indeed any of the others that have been mentioned over the years ("smallest", "most expensive to operate", "least visited") would be fallacious, inasmuch as we believe there are a number of important factors that WC have not taken into account. We submit that its analysis has been insufficiently thought through, and that while the projected savings may appear attractive, the reality is that they are unlikely to be achieved in terms of operating costs, while the projected annual revenue costs could be reduced significantly. We wish to make our case for the retention of the Everleigh site, and its restoration to full operational capability, as follows.

General considerations

Comment 1

Closure of the site would be entirely contrary to WC's stated policy on Waste management, which is to reduce waste, reuse and recycle.

Response

All Wiltshire residents would continue to be able to access a wide range of re-use and recycling opportunities using the remaining network of household recycling centres, combined with the improved kerbside recycling services that were introduced from 30 July 2018. Local re-use opportunities continue to be available in many Wiltshire towns including Pewsey.

Comment 2

While the recent changes in kerbside collection do indeed encourage more recycling, it is highly likely that the amount of kerbside waste recycled will therefore increase, but account then needs to be taken of the fact that there is a limit to the amount of recyclables that can be accommodated in a blue bin. Some potential recyclables, such as cardboard, that might otherwise have found their way to Everleigh, unless it remains open and full facilities are restored, are likely to be sent to kerbside household waste, rather than to alternative sites, thus incurring avoidable landfill or incineration charges.

Response

Cardboard may be placed next to the blue lidded bin when presented at the kerbside and the additional material will be collected for recycling.

We are mindful of, and understand, WC's need to make savings, but must point out that significant savings have been made already in the Waste management programme by the reduction in open days and opening times at all the Council owned HRC sites. In all cases except Everleigh, the standard opening times are 9.00 am – 4.00 pm in Summer and in Winter 10.00 am – 4.00 pm, but Everleigh operates on the reduced Winter time throughout the year. We understand that this is reportedly due to lack of demand, but regardless of this factor, which may be debatable, the operating costs of Everleigh as a result, will have produced an extra saving in comparison with the all the other sites.

Comment 3

One cogent reason why the visitor numbers seem to appear low in comparison with other sites, is that our research based on the 2016/17 site usage (visitor numbers) and site usage (total waste tonnage) statistics provided by WC in the consultation documentation, shows that visitors to Everleigh take on average, significantly more waste for disposal per visit i.e 0.058 tonnes, than at any of the other sites. This is some

170% of the average amount taken by visitors to Purton with the lowest amount of waste disposed of per visit i.e 0.034 tonnes and 138% of the average for all sites at 0.042 tonnes. That this should be the case is unsurprising, given that most of the catchment area for Everleigh is substantially more rural than the catchment area for any of the other sites. However, were these last two percentages to be applied to the Everleigh visitor numbers, these would rise to some 65,000 when related to Purton, and some 53,000 when related to the average. We consider that when the recorded visitor numbers to Everleigh are looked at in isolation, they are, and after adjustment, still would be, the lowest of all the sites, but that in considering the site as a whole, weight should be given to the fact that Everleigh is clearly in a more efficient position compared to the others, in terms of volume of waste disposed per visit. It is noted that WC acknowledges the point in its consultation response report, but has carried out no proper analysis.

Response

The analysis has been carried out. Please see the table below. The figures set out above are not disputed. It remains the case that Everleigh has the lowest number of visitors and the collects the lowest number of tonnes of waste and recycling. Figures are taken from October 2016 to September 2017.

Site	Visitors	Tonnes	Kilograms per visit
Trowbridge	211,443	8,106	38.34
Salisbury	141,171	7,053	49.96
Stanton	157,903	7,139	45.21
Warminster	149,066	6,152	41.27
Melksham	170,183	5,999	35.25
Purton	137,870	4,794	34.77
Amesbury	128,846	5,586	43.35
Devizes	108,091	4,589	42.45
Lower Compton	80,657	4,280	53.06
Marlborough	92,294	3,437	37.24
Everleigh	38,475	2,244	58.32
Total	1,415,999	59,379	41.93

Comment 4

We feel that the value of the site to the local community has never been properly appreciated by WC, and that too much emphasis has been placed on pure and simple cost cutting. Waste disposal is, however, one of the few major WC services that impacts on every household in the County, and savings having been made already, great care needs to be taken now to ensure that any further efforts to make savings at the expense of Everleigh do not prove counterproductive. We return to this point later.

Response

The response to the consultation demonstrates that the facility is important to those local residents who use Everleigh.

Meanwhile, the value of the site to the community has been demonstrated amply by the compelling number of replies at 1,318 plus 12 e-mails to WC's public consultation. Given that this was almost entirely a very local issue, with perhaps at most some 30,000 residents affected, the contrast with WC's two most recent and important County wide public consultations on car parking charges and a 10 Year Waste Strategy, where the responses were some 1440 and 3,850 respectively, must be regarded as impressive.

Comment 5

Even more impressive is that 94% or 1,239 residents want Everleigh to remain open, and absent any comment in the consultation response report, it is reasonably assumed that the vast majority, if not all, were in favour of Option 1 in the consultation supporting documentation and wish to see Everleigh retained with full operational capability, on the same basis as other sites. We suggest that WC must respect Council tax payers wishes in this instance, as otherwise they will regard the consultation process as having been a waste of their time and their money, and it will be perceived as nothing but a pointless, box ticking, exercise that would enable WC to say that they had "consulted" on a matter on which a decision had already been taken. There is anecdotal evidence already that this would be the reaction.

Response

The consultation did not invite residents to select their preferred option. Details of the other options considered were provided so that residents could have the opportunity to comment on them should they choose to do so.

In general terms, therefore, we consider that there is a viable case for requesting WC to refuse any proposal to close the site.

Financial considerations

These are based on WC's estimates that closure would give rise to annual savings of £100,000 on operating costs.

No allowance seems to have been made by WC for the increased cost of handling Everleigh tonnage at two of the alternative sites offered, namely Marlborough and Amesbury, although this would be offset by a slightly lower cost at Devizes. Our calculations are based on Tables 5 and 6 as presented by WC at the Tidworth Garrison meeting on 21st December 2015 and on the assumption that there will have been no

material change in the interim when related to the Site Performance (tonnage) figures 2016/17 provided in the supporting documentation to the consultation. We have also assumed that it is fair at the moment, absent the possibility of any hard data as to how the former Everleigh tonnage would be distributed over the three alternative sites, to allocate this 1/3rd to each site. This would give rise to a further throughput of 748 tonnes at each site.

The cost per tonne, based on population served, comes out at:

£10.72	Marlborough	Everleigh differential:	$£3.33 \times 748 = £2,490$
£ 8.48	Amesbury	Everleigh differential:	$£1.09 \times 748 = £ 845$
£ 7.39	Everleigh		
£ 6.37	Devizes	Everleigh differential:	$(£1.02) \times 748 = (£ 763)$
		Total:	£2,572

Comment 6

The financial implications are indeed minor, but the point is raised because we do not have any indication that WC has taken this particular factor into account and that Marlborough and Amesbury are the second and third most expensive sites to operate when considered on a “population served” basis, Purton being the most expensive at £ 11.05 and Salisbury the lowest at £ 5,19. With a differential of nearly £6 per tonne, between these two different sites, it is clear that a wide variation in cost can arise, and this should be a matter for consideration.

Response

The council pays a management fee per site for the operation of the facility and a cost per tonne for the different types of material managed. Garden waste is delivered to a composting facility and paid for under a separate contract. Non-recycled waste is mainly delivered to landfill and paid for under another contract. A cost per tonne of recyclable materials managed is paid to the contractor managing the household recycling centres but this does not vary by site. Any income obtained from the sale of recyclable materials is shared between the council and the contractor. The costs above do not reflect the way in which the council pays for the service. There would be no additional costs of operating the HRCs at Marlborough, Amesbury and Devizes. There would be no increase in the costs per tonne of managing the different materials collected.

Comment 7

Of far greater significance is the question of whether the three alternative sites can accommodate the extra traffic from Everleigh at no additional expense in terms of operating costs. In an e-mail dated 28th August 2018 to PCAP, the Director of Waste stated: “The Council has assessed the number of visitors and tonnes of materials that

are likely to be diverted to other sites and found that they have the capacity to accommodate these without incurring any additional costs". We are unable to accept this statement at face value on the following grounds.

Response

The average number of visitors to Everleigh is 25 per hour. Assuming that the visits were distributed equally between the three alternative sites this would result in an additional eight or nine vehicles per hour at these HRCs. The number of visitors per hour would be lower than the number of visitors per hour to Warminster, Melksham and Trowbridge.

Comment 8

At the Tidworth Garrison meeting on 21st December 2015, the then Cabinet Member for Waste stated that closing Everleigh would save £ 135,000 per year. This was rebutted shortly afterwards by the then Portfolio Holder for Waste, who said that £60,000 would be utilised to provide an extra hour "at the remaining 10 sites" (Minutes – page 6).

Response

The savings figure quoted was based on the contract that was in place at that time. Cabinet subsequently agreed to invest in extending the opening hours at the other ten sites without closing Everleigh. This investment was made in 2016-17.

Comment 9

What this establishes is that in December 2015, WC was looking to save £135,000 by closing the site, and that £60,000 thereof would be spent elsewhere, thus producing a net saving of £75,000. It is reasonable to suggest that the average spend on the remaining ten sites would be £6,000 which would mean a sum of £18,000 in all, over the three alternatives. This does not reconcile with the Director of Waste's recent statement, while the projected savings figure has increased from £75,000 to £100,000. It is accepted that circumstances can change, and indeed did so at Everleigh in October 2017, in a manner that would have tended to reduce costs and thus potential savings.

Response

A new contract for management of the household recycling centres commenced in October 2017. The projected savings figure is based on the rates for the new contract. The investment in the additional hours was made in 2016-17.

Comment 10

The potential additional cost of £18,000 at the alternative sites is a significant figure in the context of what is under discussion, and it is difficult to accept that there will be no extra increase in staff costs in the light of the increased traffic that they will be required to bear. Working again on the same assumption that former Everleigh traffic will be shared equally over the three sites, then the additional tonnage and visitor figures, which provide support for an increase in operating costs, would be:

i) Tonnes (based on WC Oct 2016/Sept 2017 consultation document statistics)

Everleigh - 2,244 divided by three = 748 tonnes

Marlborough	$3,437 + 748 = 4,185$ tonnes.	Increase: 21%
Amesbury	$5,586 + 748 = 6,334$ tonnes	Increase: 13%
Devizes	$4,589 + 748 = 5,337$ tonnes	Increase :16%
Total	13,612 15,856 tonnes	Increase: 16% average

Response

Amesbury would manage fewer tonnes than Trowbridge, Salisbury and Stanton HRCs. Devizes would manage fewer tonnes than these plus Warminster and Melksham HRCs. Marlborough would manage fewer tonnes than these plus Purton and Lower Compton HRCs. There should be no reason to incur additional operating costs.

ii) Visitors (based on WC Oct 2016/Sept 2017 consultation document statistics)

Everleigh - 38,475 divided by three = 12,825 visitors

Marlborough	$92,294 + 12,825 = 105,119$ visitors	Increase: 14%
Amesbury	$128,846 + 12,825 = 141,671$ visitors	Increase: 10%
Devizes	$108,091 + 12,825 = 120.916$ visitors	Increase: 12%
Total	329,231 367,706 visitors	Increase: 12% average

Response

Amesbury would receive fewer visitors than Stanton, Warminster, Melksham and Trowbridge HRCs. Devizes and Marlborough would receive fewer visitors than these plus Salisbury and Purton HRCs.

Comment 11

From the foregoing we submit, despite the Director of Waste's assurance that the Everleigh traffic can be absorbed without extra cost, that there will be extra costs involved at the alternative sites. It is our view that the current alleged savings should be reduced by £18,000 as the minimum extra cost involved at the alternative sites, and that given the discrepancy between the proposed saving at Tidworth Garrison (£75,000) and what is proposed now (£100,000) i.e some £25,000. that it would be reasonable to suggest that 50% of this, or £12,500 should be set against the current figure as a contingency amount against potential miscalculation.

Response

The investment to extend the opening hours at HRCs was made in 2016-17. The difference in projected saving has arisen because there is a new contract in place.

Comment 12

It is clear that no allowance has been made for fly tipping – a matter that was dismissed by the WC team at Tidworth as an immaterial side issue as far as household waste was concerned (pages 5 and 6 of the Minutes refer), but it was one that was raised repeatedly by individual residents in the course of our publicity campaign for the consultation. We note that fly tipping cost the Council in excess of £2,500,000 resulting from over 3,000 incidents related to Council property in 2017. We do not have the data to determine where the worst areas are, or the amounts that may be attributable to either household or commercial waste, but if the overall bill was attributed, as an average, over the areas covered by the current 11 sites, then the resulting figure would be some £227,000 per site area. We suggest the particularly rural area surrounding Everleigh, by its very nature, would become a greater target for the illegal disposal of household waste, with the perpetrators unlikely to be detected in the act, were the site to be closed.

Response

The figure of £2.5m relates to the council's total spend on clearing litter, including small scale fly tipping. Spend in the current financial year on clearing large scale fly tipping is £100,000. While fly tipping has increased in recent years in line with a national trend there has been a slight reduction in the number of reports in the current year. There is no evidence to suggest that residents will carry out this criminal act rather than travel further to access an alternative HRC.

Comment 13

The extent to which WC owns property in the Everleigh catchment area is not known, and much of the land is in private or MoD possession. Nevertheless, a mere 2.5% rise in WC's clean-up bill as a result of the closure of the site would amount to £62,500 and when related to the average figure per site area of £227,000 is only 27.5% thereof. £ 62,500 thus seems to be a reasonable estimate as to what would be needed to clean up the resulting illegal disposal of household waste on Council property located within the Everleigh catchment area.

Response

See comments on costs above.

We would, however, ask WC to bear in mind that the effect on private property owners (Council Tax payers too) and the MoD could be considerably greater, and suggest that WC has just as much a duty towards them as it does in respect of their own property, to ensure that circumstances are not unnecessarily created that can result in illegal action which harms their mutual interests.

Comment 14

No allowance has been made for initial clearance or ongoing security costs at the site. The former, insofar as it is carried out, would be presumably a "one off" cost, and limited to removal of moveables. Security costs at the site, which cannot be simply abandoned for obvious reasons, will be ongoing and reduce savings. In her e-mail of 28th August to PCAP, the Director of Waste stated that WC would be under no obligation to clear the site or reinstate it, but did not address the question of ongoing security costs. Unless the gates and fences are properly maintained for example, there must surely be variety of risks to which the site could become liable, such as public safety or becoming a rubbish dump. We suggest that a reasonable estimate of the cost of maintaining the site in a safe and secure condition could be in the region of a minimum of £2,000 per annum, and possibly considerably more.

Response

The council would not anticipate incurring any costs for security of the site.

Given that at the time of writing, Cabinet has yet to make a decision on the consultation report, we nevertheless must comment on the alleged saving of £43,000 of annual revenue costs. Should this be a factor that WC considers mitigates against keeping the site open, with a total anticipated saving over eight years of £344,000 in respect of new equipment, we submit that the arrangement with the contractor to provide the capital cost of this equipment is, in effect, a leasing arrangement. This must come at a price, as commercial concerns do not lend money for nothing and we submit that outright capital purchase will be cheaper in the long run. We concede there can be advantages in leasing, where a maintenance contract forms part of the arrangement,

but in the case of metal skips, do not see that anything other than the most minimal maintenance would be required over a considerable period of time.

Comment 15

Outright purchase of the mobile compactor apparently would also benefit WC, noting the Director of Waste's comment in an e-mail dated 28th August 2018 where she remarked "The proposed mobile compactor would be the same as those in use at other sites including Marlborough and Devizes. The existing mobile compactor unit is being provided under a lease agreement. The costs identified would include the purchase of a new mobile compactor unit which would be more cost effective over the duration of the contract than continuing to lease the current compactor". If that is the case, then if it is cheaper under the arrangement with the contractor, which is in itself a form of lease arrangement, in which there must be some element of profit, then it would seem that outright purchase must be the cheapest long term solution.

Response

The council's capital budget as well as the revenue budget is under significant pressure and therefore purchase of the equipment is unaffordable.

Comment 16

There is no necessity to buy new equipment. We have no doubt that cheaper, used, but still serviceable equipment would be perfectly acceptable to the public, and would keep costs down.

Response

The provision of new equipment is based on the eight year contract period. The equipment is in use several times a day and the purchase of second hand equipment would be likely to result in significant additional maintenance costs in the later years of the contract period.

We are unable to comment on the cost of repairs to the site due to lack of specific information and the fact that some are still only budget estimates. However, we believe that were the current potential cost of £102,500 to be used as an excuse not to retain the site open, then this would be met with outrage by local residents, given the fact that they are now required is down entirely to the negligence of WC and its predecessors in failing to check, inspect or maintain the site infrastructure for over almost twenty years. WC must also take into account that this failure has resulted in saving in maintenance costs over a lengthy period, which should now be put to rectifying the situation.

Summary

Comment 17

In the light of the foregoing, we believe that there is a strong case for keeping the site open, preferably with restoration to full operational capability and have concerns that the savings of £100,000 proposed by WC will not be achieved as anticipated, as set out below:

Additional tonnage costs (09.)	(£ 2,600) DR
Estimated additional operating costs (10.d) 18,000) DR	(£
Discrepancy contingency amount (10.d)	(£ 12,500) DR
Fly tipping (11b.)	(£ 62,500) DR
Security (12)	(£ 2,000) DR
	(£ 97,600) DR
Credit estimated savings	£ 100,000 CR
Balance	<u>£ 2,400 CR</u>

Response

The council does not accept these figures for the reasons set out above.

PCAP/PPC/CPRE consider that they have made every effort to be reasonable and transparent in their assessments and assumptions, some of which have had to be made without the benefit of detailed knowledge. There may well be variations in our figures that would otherwise have come to light, but we do not think that our calculations are farfetched, and each one has reason behind it. Consequently, we wish to suggest in the light of the above, and the very clear public demand that the site be kept open, that Cabinet refuses any proposal to close it.