

**CABINET MEMBER FOR WASTE, PROPERTY, ENVIRONMENT AND DEVELOPMENT
CONTROL SERVICES – CLLR TOBY STURGIS**

WASTE MANAGEMENT SERVICE

OFFICER CONTACT: Andy Conn 01225 713422 Email: andy.conn@wiltshire.gov.uk

REFERENCE: WPED-008-12

WASTE SERVICE BUDGET SAVINGS 2012-13

**REVIEW OF MINI RECYCLING SITES
AND HOUSEHOLD RECYCLING CENTRE SUMMER EVENING OPENING HOURS**

Purpose of Report

1. In the waste services budget for 2012-13 the service proposes to make savings of £300,000. This will help the Council to spend more on priority services, such as those for vulnerable adults and children, and roads. The service is proposing to do this by following the recent major improvements to kerbside recycling services with some reduction in the number of mini recycling sites, primarily those used by schools and not accessible to the general public, and the removal of summer evening opening hours at Wiltshire's Household Recycling Centres (HRCs). Proposals are made for alternative services to local authority schools.
2. This report summarises the results of public consultation on the proposals held from 29 February to 28 May 2012 and the technical analysis of mini recycling sites and explains how these have been used to identify the proposals.

Background

Mini recycling sites

3. Currently, there are just over 300 local mini recycling sites in operation across Wiltshire, collecting a mixture of paper, glass, cans, textiles, plastic bottles and cardboard. Most of the sites are located in public spaces, including village halls, public houses and recreation grounds and are accessible at all times. These sites mainly collect a "traditional" range of paper, glass, cans and textiles (141), with some sites in north, south and west Wiltshire also collecting plastic bottles and cardboard (61). A small number of sites (23) in west and north Wiltshire collect only plastic bottles and cardboard. In addition, a substantial number (139) are located at schools and collect only paper. These sites tend to collect the lowest tonnages and are not normally accessible to residents.
4. Following the successful introduction of improved kerbside waste and recycling collection services in Wiltshire during 2011-12, residents can now recycle a wider range of materials from the kerbside. The mini recycling sites are therefore being used less by residents and the recycling tonnage collected has reduced year on year. Table 1 shows a steady decline in the use of paper, glass and can sites, plus a more recent decline in use of sites for plastic bottles and cardboard recycling. By 2011/12 these sites collected 31% less tonnage than during 2007/08. The waste service expects a further reduction of plastic bottle and cardboard collected due to the popularity of the new countywide kerbside collections of these materials, which are averaging 750 tonnes per month.

Table 1: Mini Recycling Site Tonnages

	2007/08 Tonnes	2008/09 Tonnes	2009/10 Tonnes	2010/11 Tonnes	2011/12 Tonnes
Paper, Glass, Cans	6,547	5,804	5,465	5,062	4,339
Plastic bottles/Cardboard	1,279	1,581	1,853	1,513	1,090
Total	7,826	7,385	7,318	6,575	5,429
Change from 2007/08	n/a	-6%	-6%	-16%	-31%

Household Recycling Centres

5. Since 2006, Wiltshire's HRCs have been open from 5.00 p.m. to 7.00 p.m. on Wednesday and Thursday evenings between April and October, to help residents to recycle their garden waste in particular¹. All residents now have access to a free garden waste collection from the kerbside to make it easy to recycle garden waste from home. Currently, over 126,000 households have a collection. This is estimated to be about 70% of all households with gardens. Therefore, reliance on HRCs is reduced. Further households with gardens are expected to join the service gradually as it becomes better known. Anecdotal evidence from site staff suggests that the HRC evening service is not much utilised by residents.

The Proposal for Consultation

6. The proposal set out within the consultation documents is:
- To withdraw plastic bottle and cardboard collections from mini recycling sites and halve approximately the remainder of recycling bring sites.
 - To cease summer evening opening at household recycling centres – this currently allows residents to utilise the sites until 7.00 p.m. on two nights per week instead of 5.00 p.m. Opening to 5.00 p.m. each day would continue².

The Consultation Process

Public Consultation:

7. The Council consulted with residents between 29 February and 28 May 2012, in order to obtain their views on the proposed changes outlined above. The consultation asked respondents to complete a short questionnaire which was made available on the Wiltshire Council website for the three month period (**see Appendix 1**). A postal copy of the questionnaire was also made available by the Council's customer services teams throughout this period.
8. The questionnaire also sought information on residents' recycling behaviours, to ascertain the impact of the proposals on their ability to continue recycling if the proposals are implemented.
9. A communication strategy was agreed before the consultation took place to advertise the consultation and encourage responses. Key communications methods which were used include:
- 'Your Wiltshire' residents magazine
 - Parish newsletters
 - Community Area Boards – Chairman's announcements and presentations
 - Community area newsletters

¹ Salisbury HRC has longer opening hours than the other sites, due to longstanding contract arrangements.

² See footnote 1 for the separate arrangement for Salisbury HRC.

- Press releases
- Wiltshire Council staff newsletter
- Wiltshire Council website

Land owner consultation:

10. An important aspect of the consultation was to engage with land owners of the mini recycling sites, to seek their thoughts on their site and any future developments that they foresaw. The intention was to highlight any sites which were likely to be removed in the near future or any particular issues which had not been identified by the Council. This consultation was undertaken by sending a letter, along with a questionnaire, to all landowners.

Results of Public Consultation

11. A total of 384 responses were received over the three month consultation period. This level of response is considered to provide a good understanding of residents' views.
12. Residents were asked to provide a postcode if they wished to help the Council to gain a better understanding of the geographical spread of respondents and, in particular, if respondents in rural areas had differing recycling needs to those in urban areas. 269 respondents provided a valid postcode. Nothing was received from the Salisbury/southern community areas. Due to the relatively low numbers of post coded responses and lack of response from the southern parts of Wiltshire, it is not appropriate to report the responses based on community areas.

Response to Questions (**Appendix 2**):

13. Question 1 focused on use of current services by residents. 87% of respondents frequently use the kerbside black box recycling service, while 90% frequently use the plastic bottle and cardboard recycling service. A lower number (65%) utilise the garden waste collection service frequently. However, this may be influenced by the seasonality of the waste stream and the fact that the Council is still to deliver garden waste bins to those residents signed up to the second phase of the new service³. 48% of respondents utilise household recycling centres frequently, whereas only 24% of residents felt they used mini recycling sites frequently.
14. Question 2 asked respondents about their change in usage of mini recycling sites and household recycling centres since the improvements in kerbside collections. Of the 349 people that responded to the question, 32% of residents now never use the mini recycling sites, 35% of respondents use them less often and 30% use them the same amount. 38% of residents utilise household recycling centres less often due to the kerbside recycling improvements and 55% of residents use them the same amount as they did before the improvements.
15. Questions 3 and 4 highlighted the usage of the summer evening household recycling centre opening hours in 2011 and the potential impact of the removal of these extended hours. 47% of respondents said that they did not make use of the extended hours at all, with a further 14% only using this opportunity once. This corresponded with 60% of people feeling that the removal of summer evening opening would have no impact on them. A further 25% of people thought that the removal would have a small impact. Only 11% of people said they used the additional hours a lot and 15% of residents declared that the removal would have a big impact on them.

³ About 70% of households likely to take part in this collection now have or have ordered bins. See paragraph 5.

16. Respondents were asked to declare their age group, if they wished. From the 375 people that completed this question, it is clear that there was a good spread of age groups contributing to the consultation. Those respondents aged between 55 to 64 and 75+ felt the reduced opening times would have the greatest impact on them, whereas those aged between 45 to 54 and 65 to 74 felt the reduction would not affect them significantly. 15% of employed and self employed residents felt the impact would be significant, whereas the majority of this group felt the impact would be small or minimal.
17. Of those residents that consider themselves disabled (2.4%), 22% felt the removal of summer evening opening hours would have a big impact on them, whereas 44% felt that the impact would be minimal.
18. Question 5 asked respondents for their views on the criteria used to analyse mini recycling sites. The top three criteria highlighted by residents were the usage of the sites (81%), the distance from the nearest household recycling centres (74%) and ease of use by the public (58%).
19. The least important criteria was identified as ease of emptying bins (20%), condition of site (23.5%) and site abuse or use by residents outside the county (28%).
20. Finally, 251 respondents made additional comments. The five key concerns that were related to this consultation are shown in Table 2. Details are shown in **Appendix 3**.

Table 2: Comments made by survey respondents (see also Appendix 3)

Issue	Frequency
<p>Salisbury HRC staying open longer than other HRCs Residents commenting on the fact that Salisbury HRC has different opening times to other HRCs.</p>	43
<p>Support for summer evening opening due to working hours/distance Those residents who felt late night opening was very beneficial because they could use HRCs after normal working hours.</p>	28
<p>Support for alternative opening hours Residents who felt that instead of simply cutting the evening hours, alternative methods could be used, for example opening earlier.</p>	15
<p>Support for reduction of mini recycling sites – due to availability of kerbside services Those who felt that mini-recycling sites were no longer needed as materials are now collected kerbside.</p>	15
<p>Support for keeping all mini recycling sites open Residents who simply felt that all mini recycling sites should be kept open.</p>	15

Results from mini recycling site land owner consultation (Appendix 4)

21. A total of 21 questionnaire responses were received and collated. 16 owners were keen for their mini recycling site to remain, with the main reason being that owners felt that the sites were still heavily used by local residents. Additional comments were received by some landowners seeking expansion of the range of materials collected at their sites.
22. Three respondents felt they would like to remove their mini recycling site. Reasons given were future plans for land in question, the increase in kerbside services and an increase in fly tipping around the site.

Analysis of Mini Recycling Sites

23. The number of mini recycling sites open at March 2012 is shown in Table 3.

Table 3: Number and type of mini recycling sites

Category of mini recycling site	Number at March 2012
School bring sites – paper collection only / limited access	139
Public bring sites – open access, including:	164
• Plastic bottles and cardboard only (west / collection by Hills)	22
• Plastic bottles and cardboard only (north / collection in-house)	1
• Plastic bottles and cardboard plus other materials (plastic bottles and cardboard collection in-house except west / other materials by Hills)	61
• Other materials (paper, cans, glass textiles) only	80
Total bring sites (school sites plus public access sites)	303

24. The financial savings require removal of the plastic bottles and cardboard bring sites and an approximate halving of the remaining bring site network. The current network of mini recycling sites has therefore been analysed, using the following criteria:
- (i) How much recycling is collected from each site
 - (ii) Distance from the nearest household recycling centre
 - (iii) Distance from other mini recycling sites
 - (iv) Which sites serve lots of housing
 - (v) Ease of use by the public (eg access and parking)
 - (vi) Ease of emptying the recycling bins
 - (vii) Condition of the site
 - (viii) Whether the site is subject to frequent abuse
 - (ix) Whether the site is located where it is likely to be used by non-Wiltshire residents.
25. The public response to the questionnaire survey indicates that their view is criteria (i), (ii), and (v) are the most important. The analysis therefore includes an alternative in which these criteria have been given additional weighting (see Table 4).
26. The results of the analysis are shown in **Appendix 5**. Most criteria were scored numerically. Others were assessed on a “Red, Amber, Green” basis and this information was used to rank sites with the same numeric scores.

27. The analysis shows that :
- (i) There are some public access sites that perform less well than the plastic bottles and cardboard sites.
 - (ii) In general, sites at schools perform less well than public access sites, if the list of public sites is amended by closing the least well performing and replacing them with former plastic bottle and cardboard sites, which would otherwise be closing, by transferring collection bins to the latter (see Table 4).

Table 4: Relative Performance of Mini Recycling Sites at Schools

Number of School (paper only) Sites	Number that perform less well than public sites		
	Weighted analysis / all sites	Unweighted analysis / poorest performing public sites replaced by former plastic bottle and card sites	Weighted analysis / poorest performing public sites replaced by former plastic bottle and card sites
Total			
139	76	132	135

Note: numbers include two public sites proposed for closure in response to owner comments.

School sites – other considerations

- 28. The 139 schools with paper skips are receiving a service that is not available to other schools. In total there are about 250 schools listed in the Wiltshire school performance ratings⁴. Currently, the Council is providing a service to about half of Wiltshire's schools, which others do not receive.
- 29. A number of schools have been requesting additional recycling services, such as plastic bottle and cardboard (blue top bin) collections.
- 30. Changes to the Controlled Waste Regulations (CWR) 1992 came into force in April 2012. The new CWR allows councils to charge schools for both collection and disposal, except where a collection was already in place at April 2012⁵. In the latter case, a collection charge only may be levied.
- 31. It would therefore be possible to offer a charged recycling service under the CWR. Charges would be those recommended to the Cabinet Member for Waste, Property, Environment and Development Control Services for approval in March 2012⁶, plus the Hills contract cost per tonne for disposal, where a service had not been previously provided.
- 32. Under the terms of the Household Waste Recycling Act, from 31 December 2010 any waste collection service would need to make provision for collection of at least two recyclables from schools. This could be met by offering a separate charged collection of plastic bottles and cardboard (blue top bin service). It is also likely that Hills would be able to collect other dry recyclates from each school using the black box kerbside service.

⁴ <http://www.intelligencenetwork.org.uk>

⁵ Where a school collection is already being made, the waste authority will be allowed to charge only for collection.

⁶ Cabinet Member Decision - Fees and Charges for Waste management Services 2012/13

33. Alternatively, particularly as a short term measure, schools could be issued with a pass enabling them to take recycling to their nearest HRC. The waste service issues passes in this form to a range of charities and similar organisations, including some private schools. Schools' waste is classified as Household Waste under the 2012 Regulations and is eligible to be collected at HRCs. Visitors to HRCs are believed to have reduced following the expansion of kerbside collections.
34. Finally, the waste service would remind schools that they do not have to use Council services and may opt instead to use a commercial waste and recycling collector. This should also avoid any concern that the waste service is seeking contracts with schools, which could be in conflict with duty of the service and the rules surrounding exemption from VAT on Council collection contracts.
35. Options for a service to schools would therefore be:

Service level	Charges for:	No charge for:
All Local Authority Schools Access to household recycling centres under a "passport" system operated by the Council waste service	Not applicable	Use of HRC – including a wide range of recycling services (NB limits could be set on deposits of such materials as furniture, computers and Waste Electronic and Electrical Equipment, as done with charity passes.)
All Local Authority Schools Charged collections	Plastic bottle and cardboard collection Black box collection Second bins and boxes to be available	Not applicable
All Local Authority Schools Independent contracts with waste management companies	Commercial contract charges (no Council involvement in collection or disposal)	Not applicable

Main Considerations for the Council

36. The consultation on the proposal for service savings received a good number of responses, representing a wide range of age groups. However, analysis by community area (post code) was not attempted, due to the relatively low number of postcodes supplied, and the lack of information from south Wiltshire community areas. It is not understood why this is the case, as the communications strategy was countywide and all residents received the same opportunity to contribute.

Mini Recycling sites

37. The tonnage data, along with the findings from the questionnaire, suggest that mini recycling sites have been used significantly less in recent times, with around 68% of respondents stating that they use the sites less or never since the introduction of increased kerbside collections. Collected tonnage has been reduced by 31% in four years. Only a quarter of people that responded to the questionnaire stated that they use the mini recycling sites frequently.
38. When considering the criteria used for assessing the mini recycling sites, respondents felt the usage, location and ease of public access were the most important.

39. The technical analysis of mini recycling sites has examined performance, using a range of criteria, and explored the effects of weighting those considered to be most important by the public. The analysis concludes that:
- (i) Sites currently hosting plastic bottle and card collections are performing better than some other sites. Following withdrawal of plastic bottle and cardboard bring sites, these sites should be retained for the collection of other materials and the most poorly performing traditional sites should be closed instead.
 - (ii) Sites at schools are nearly all out-performed by public sites. These sites provide a service to about half Wiltshire schools, which is not available to the remainder. There are opportunities to provide a more extensive recycling service to all schools, although some options would involve charging. Closure of school paper recycling sites would achieve the reduction in the overall number of sites required to achieve budget savings.
40. The resulting network of mini recycling sites following these changes has been checked for coverage. Further minor adjustments are proposed, retaining two sites on the southern fringes of Salisbury, where there would otherwise be gaps in the urban network. These would replace two sites proposed for closure at the owners' request (see below).
41. Three site owners responded to the consultation by asking for their sites to be closed. One site at Ogbourne St George is due for redevelopment and would have to be closed in normal circumstances. The site at Shaw School is required for parking and there are sites nearby at Broughton Gifford and Melksham.
42. Closure of the site at St. James Street, Ludgershall has been requested by the Town Council. This occupies parking spaces, and has been subject to vandalism. However, this is the only site serving a sizeable settlement. Further work is needed to improve the site, or find an agreed alternative.
43. These changes would provide the most extensive and effective network possible while providing the required savings. **Appendix 5** provides a list of all sites, plus a "summary of proposals" coding for those that would be changed from plastic bottle and cardboard collection to other materials, and those that would be closed. The **attached maps** show changes as follows:

Map 1 shows the existing public sites
Map 2 shows the school / paper only sites
Map 3 shows the proposed remaining sites.

Household Recycling Centres – Summer Evening Opening

44. A number of residents would be affected by the removal of summer evening extended opening hours, due largely to their working patterns. However, the majority of people felt that the changes would have little or no impact on their recycling behaviours. This is also the case for those respondents that classed themselves as disabled.
45. There is some demand for HRC opening hours to be reviewed. Response to the survey included comments on the difference in opening times at Salisbury compared to other HRCs and the difficulties for a minority of working residents should the evening opening be removed. Some residents suggested that more flexible opening times would be advantageous. Examples given include opening from later in the morning or closing for one day per week to allow for additional evening hours.

Environmental Impact of the Proposal

46. The provision of kerbside recycling services is reducing the number of journeys made by the public to mini recycling sites and household recycling centres. Reduction of the mini recycling site network will reduce contractor collection miles significantly, and remove duplication. Some residents may travel further to sites, but numbers are expected to be limited.
47. The effect of the change to HRC summer evening opening hours is expected to be marginal, due to the availability of the kerbside collection of garden waste in particular.

Equalities Impact of the Proposal

48. The consultation responses indicate that some residents who have disabilities expected to be detrimentally affected by the changes, but the great majority do not. There is a similar response from residents in older age groups.

Risk Assessment

49. Project risk assessments have been carried out. Some risks have now been closed or reduced, due to progress made. The major risks still on the register are:
- (i) Corporate decisions may affect timetable, delaying the decision / implementation and budget savings.
 - (ii) The Council may reject the proposals and require other savings to be found.
 - (iii) Legal challenge to council decision.
 - (iv) Negative public / site owner attitudes to the changes, resulting in high levels of customer interaction.
50. This report and the recommendations address the first two risks. The waste service has addressed the risk of legal challenge by following a transparent process, including a widely publicised public consultation. The proposed action and communications plan (**Appendix 6**) will mitigate negative public reaction, but this could occur at a limited number of locations, leading to some additional work.
51. Most sites which generate an income for their owners from the contractor in return for use by the service are relatively high performers, and are proposed for retention. However, loss of income may be an issue for owners of two smaller sites proposed for closure. The waste service will seek to resolve this with the contractor.

Financial Implications

52. The recommendations will achieve the budget savings required, from 2013-14 onwards. There will be a shortfall during 2012-13, due to the time required for consultation and notice to site owners and operators. This will exert some pressure on the waste management budget, but best endeavours will be made to absorb this.

Legal Implications

53. The main legal implication is the risk of challenge to the Council's decision in the courts (see paragraph 45 above).

Options Considered

54. The proposed budget savings are largely specific. In the case of closure of part of the mini recycling sites network, the main alternative would be to close some school sites and some public sites. This would retain more low performing sites and leave an even smaller proportion of schools receiving a service not available to others. Therefore, this option has not been recommended.

Reason for Proposals

55. To achieve planned and budgeted for savings to waste management service expenditure, by reducing potential duplication following the expansion of kerbside recycling services, whilst retaining an effective public back-up service at mini recycling sites and daily access to household recycling centres.

Proposals

56. It is recommended that:
- (i) The 139 paper only mini recycling sites at schools be closed from 31 August 2012.
 - (ii) The waste service include with the Action and Communications Plan provision of information and advice to Local Authority schools about options for dealing with their recyclates.
 - (iii) Plastic bottle and cardboard collections be withdrawn from all relevant mini recycling sites, from 1 October 2012.
 - (iv) Promotion of the kerbside collection of these materials should form part of the preparations for this change.
 - (v) The current plastic bottle and cardboard recycling sites should instead accommodate the paper, glass, cans and textile bins currently deployed at 23 least well performing traditional sites, which will be closed from 1 October 2012.
 - (vi) In response to owner requests, sites at Ogbourne St George and Shaw Primary School be closed from 1 October 2012. These should be replaced by two sites on the southern fringes of Salisbury, which would otherwise be closed, to retain a good network in this area. However, negotiations should be undertaken with Ludgershall Town Council, to retain a site in the town.
 - (vii) The cessation of summer evening opening (Wednesday and Thursday evenings 5.00 p.m. to 7.00 p.m., from April to October) at Household Recycling Centres be confirmed.
 - (viii) The scope for changing Household Recycling Centre opening hours to provide access in the early evenings and the same hours at all sites should be reviewed, and secured as part of the procurement of a replacement service in July 2016, or earlier if possible.

- (ix) These changes are implemented according to the Action and Communications Plan in **Appendix 6**.

A list of the resulting changes to local recycling sites is attached, at **Appendix 5**.

The following unpublished documents have been relied on in the preparation of this Report:

Waste tonnage figures for mini recycling sites and household recycling centres, consultation questionnaire response and additional analysis spreadsheets