

REVIEW OF THE AMENITY SKIP AND RECYCLING CENTRE AT CODER ROAD LUDLOW

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1. Summary

This report seeks Portfolio Holder approval of the recommended option for closure of the Coder Road Amenity Skip and Household Recycling Centre (amenity skip site) due to its poor recycling performance compared with other sites. The recommendations are based on the findings from an internal review of the effectiveness of the county's Household Recycling Centres (HRCs) and Bring Sites and the consideration of the outcome of the two public consultations. In addition, the perceived disbenefits do not outweigh the decision to close the facility, which would also enable land to be freed up for alternative future use including waste management, to benefit the local community and economy.

2. RecommendationsRecommendations

- 2.1 That approval is given for the closure of the Coder Road Amenity Skip and Household Recycling Centre (the amenity skip site).

Reasons for decision

- 2.2 The reasons for this decision are the existing poor performance of the facility, prohibitive cost in upgrading the amenity skip site in-line with the performance of the 5 HRCs across the county and the potential opportunity to use the land occupied by the amenity skip site into a wider development for the local community and, to achieve financial savings. This will also result in the decommissioning of a poor performing facility and encourage greater use of nearby modern HRCs providing a wider range of recycling opportunities for local residents and improving the Council's recycling performance.

REPORT**3. Risk Assessment and Opportunities Appraisal**

- 3.1 In accordance with the Environmental Protection Act 1990 Shropshire Council, in its role as a Waste Disposal Authority, must provide at least one site within the county for residents to take their waste for disposal or recycling. This requirement is more than satisfied through provision of a Household Recycling Centre (HRC) in each of the five former administrative Districts (referred to operationally as collection areas).

- 3.2 An internal review was conducted on the Council's non-kerbside collection service (bring sites and HRCs) with a view to standardisation of service and optimisation of recycling performance at a reduced cost to the taxpayer, leading to savings overall. It was identified from this exercise that there would be no benefits in reducing the number of bring banks and that hours of operation at the HRCs would be standardised in line with other local authority practice
- 3.3 The HRC serving the South Shropshire area located in Craven Arms is open 7 days per week from 9am to 5pm and has been enhanced, since the start of the Integrated Waste Management PFI contract with Veolia Environmental Services (VES) and enables local residents to recycle 27 different types of material. Craven Arms along with the other four HRCs returned a recycling rate of approximately 60% in the 2012/13 financial year.
- 3.4 In comparison, the amenity skip site at Coder Road, Ludlow Business Park, operates on a different schedule to the 5 HRCs with hours of operation 12 noon to 20:00 Tuesday to Friday and 8am to 13:00 on Saturday. The facility only enables residents to recycle 14 different types of material due its small size and returned a much lower recycling rate of less than 30% in the 2012/13 financial year. In fact over 70% of material received at the site was residual (black bag) waste which is currently disposed to landfill.
- 3.5 The amenity skip site is located adjacent to the disused street care depot. Expansion of the HRC into this area to accommodate additional recycling containers would cost in the region of £0.5m (£0.6m with weighbridge) plus annual operating costs of £200,000. The return in terms of increased recycling and composting to 55% in line with the performance of the 5 HRCs across the county would result in a 1.3% increase in HRC performance and 0.2% in total recycling and composting, which has a negligible impact on improving recycling targets and is not justifiable on cost-benefit grounds.
- 3.6 The amenity skip site appears to be popular with a number of local residents who use it to dispose of additional residual and garden waste because it negates the need for local residents to travel to Craven Arms HRC a distance of several miles. This is based on receipt of a petition containing 1700 signatures predominantly from the Ludlow area, protesting against a closure of the site and the figures stated in 3.4. Continued operation of the Coder Road site would also mean that South Shropshire would be the only collection area with more than one staffed waste management facility.
- 3.7 The preferred option arising from the internal review was that despite its popularity with local residents the closure of the amenity skip site is justified and alternatives considered for its future use, which include but are not limited to:
- i. Clearance of the site and sale of the land.
 - ii. Conversion of the amenity skip site to an unmanned bring bank site.
 - iii. Clearance of the amenity skip site and incorporation of the land into the re-development of the neighbouring AD plant site at Coder Road.
- 3.8 With regard to the first suggested alternative, this would provide annual savings of c£100,000. However, due to its relatively small footprint and relation to other facilities it is unlikely that the site would provide future value for sale as an asset.
- 3.9. With regard to the second alternative use this would offer similar operational savings to sale of the land. In addition, the Ludlow area is already well served with such sites and the bring banks currently at Coder Road handle only 8% of the total throughput.
- 3.10 With regard to the third alternative this is more complex than alternatives 1 and 2 and is discussed in greater detail below.

- 3.11 The final decision with regard to the future of the land will be taken by officers using delegated authority, however to assist in this decision the above suggested uses were included as part of a consultation process to identify public opinion regarding alternative use of the site.

Background to the adjacent anaerobic digestion plant and Biocycle

- 3.12 The land and AD plant at Coder Road was leased by the Council to a company called Biocycle South Shropshire Limited. The Council was a founding member of the company with a private sector partner and recently the company and lease has transferred into the sole ownership of Cwm Harry Land Trust (CHLT), a local charitable organisation who have committed to redeveloping the Ludlow AD facility as the UK's first community operated AD plant and as a centre of AD excellence in the UK. The Council is no longer a member of Biocycle South Shropshire Limited.
- 3.13 The Council has been working closely with CHLT since transfer of the lease and operation of the AD plant, and remains the 'Landlord' of the site with all assets and critical components forming the plant in sole ownership of the Council.
- 3.14 CHLT has advised that for the AD plant to be commercially viable, expansion of the operation is most likely to be necessary in the near future. Inclusion of the adjoining land and vehicular access afforded by the parcel of land utilised for the Coder Road Amenity Skip site would in CHLT's view be the best way to facilitate expansion of the AD plant.
- 3.15 A direct transfer of the amenity skip lease from VES to CHLT is not possible as the lease is linked specifically to the waste PFI contract, therefore the necessary mechanism would require VES to surrender this lease to the Council.
- 3.16 In addition, VES hold an environmental permit for the amenity skip site, requiring engagement with the permit regulator, the Environment Agency, in the event of changes of use for the site. The permit can either be transferred to another operator or surrendered to the EA. As future use of the site would not be as a public waste and recycling centre, VES would surrender the permit.

Options appraisal on the Coder Road amenity skip site

- 3.17 The following options have been identified and considered with regard to the future of the amenity skip site.

Option 1 Maintain operation of the amenity skip site - Keeping the facility open in its current form would not realise any financial savings with the current costs of £100,000 not expected to decrease in the future due to increase in cost of residual waste disposal, which accounts for 70% of material received at the site. To upgrade the facility would require significant investment, which is not justifiable in the current financial climate, compared with the relative benefit of having a facility in this location. This option therefore, involves keeping the site open in its current form and is essentially the 'do nothing' option. This retain in place a facility which provides little benefit in terms of recycling and results in reduced usage by Ludlow residents of nearby modern HRCs, which provide a considerably larger range of recycling capability. **This option is not recommended.**

Option 2: Closure of the amenity skip site.

This involves the closure and decommissioning of the site in its current form and consideration of future alternative uses of the site as a community facility based on the

suggested uses set out in paragraph 3.7 of this report. This option will deliver guaranteed annual financial savings of £100,000 and removes a poorly performing facility which serves predominantly to attract residual waste destined for landfill. Closure of the site will also encourage local residents to make better use of the existing accessible modern HRCs which have the capacity and provide a wider range of recycling capability, reducing the costs of waste management for the Council and encourage people generally to recycle more. A site closure assessment is attached in Appendix 1. **This is the recommended option**

4. Financial Implications

- 4.1 The Council is required to make £80m of savings over the next three financial years. . The closure of the site would result in full year savings on staffing, servicing vehicles, site licences and maintenance totalling £100,000. In addition, the material diverted to the nearest HRC at Craven Arms would enable a larger proportion to be recycled. Maintaining the current operation of the amenity skip site would not realise any financial savings.
- 4.2 As VES have a legal requirement to formally notify their site staff, this would result in the site remaining open until the end of February 2014 should a decision to close be taken in January. This will be followed by site decommissioning and stationing of an operative at the site until the end of March 2014 to re-direct residents to alternative sites. CCTV already covers the site, and this service will be maintained to deter unauthorised use during the decommissioning period. In this regard, although no savings would be obtained for the financial year 2013/14, there will be no ongoing costs associated with site decommissioning in 2014/15 in which full-year savings of £100,000 would be realised.
- 4.3 Any future change in use of the amenity skip site, however; will involve discussion with the Council's Planning Service and the Environment Agency regarding amendment to the planning conditions and environmental permit respectively. VES will also need to surrender the amenity skip site lease and environmental permit, VES agree to this course of action.

5. Background

- 5.1 On 29th September 2007 Shropshire County Council, acting as Contracting Authority for the Shropshire Waste Partnership entered into a 27-year PFI contract with Veolia Environmental Services (VES) for the collection, recycling, treatment and disposal of municipal waste. As the successor authority Shropshire Council are bound by the terms of this contract.
- 5.2 Part of this contract is for the operation and upgrade of Household Recycling Centres (HRC's) of which there is one HRC located in each operational area. The 5 sites receive a total 750,000 visitors per year. An additional amenity skip site and recycling centre was introduced by South Shropshire District Council, which introduces an inequality in the number of manned household recycling sites provided for the contract. This site, although popular with local residents receives only 25,000 visitors per year.
- 5.3 An internal review of the HRCs and bring sites identified the Coder Road amenity skip site as being a poorly performing facility, which attracts residual waste as its main material and is not conducive to the Council's drive to improve recycling and reduce waste to disposal.
- 5.4 VES have expressed concern over the site's poor performance which impacts on contractual recycling targets and the reduced use by Ludlow residents of recently upgraded Craven Arms HRC which provides a considerably wider range of recycling capability.

- 5.5 Continued operation of the amenity skip site would mean South Shropshire would continue to be the only collection area with more than one staffed recycling thereby perpetuating service inequality and based on the review findings, closure of the site and consideration of alternatives for future use is recommended.
- 5.6 The Council have been in discussion with CHLT for developing the AD facility at Coder Road as a community operated AD plant and AD centre of excellence processing organic waste and providing research and development. By incorporating the land occupied by the amenity skip site into this development, this would enable the Council to significantly improve the asset.
- 5.7 From a legal perspective, by closing the amenity skip site, the Council will still comply with its minimum statutory requirement to provide residents with a Civic Amenity site within the County to dispose of their household waste. The proposals however, will require changes to the Integrated Waste Management PFI Contract with VES in order to define the new service level and financial impact.
- 5.8 A Part 1 Equality Impact Needs Assessment (EINA) is attached in Appendix 2.

6. Consultation

- 6.1 Veolia Environmental Services currently have a lease with Shropshire Council to operate the amenity skip site for a term of 27 years commencing 29th September 2007. The permitted use includes delivery of waste management services contained in the Project Agreement between the Council and VES. In addition VES have an environmental permit issued by the Environment Agency for the site to allow recycling and waste management operations.
- 6.2 The Council's contractor VES were consulted on the options proposed and agreed in principle for VES to exit the amenity skip site on the condition that the environmental permit is surrendered and not transferred to another operator. In return the full annual savings of £100,000 would be provided to the Council.
- 6.3 The Council's Environmental Maintenance Unit (EMU) have been consulted on the implications of closure of the amenity skip and will ensure that waste from fly tipping incidents that do occur is promptly removed (or arranged to be removed by their contractor Ringway) and that evidence for prosecution is gathered wherever possible.
- 6.4 A briefing note on the review of the amenity skip site was sent to all South Shropshire Councillors on 17th September 2013 setting out the rationale and list of options for alternative site use. This is attached in Appendix 3.
- 6.5 A briefing was also held with Ludlow area Councillors to discuss the review and to outline the consultation process. Their principal concerns were as follows:
- i. Fly tipping may increase if the ability to deposit residual or garden waste is removed at this site
 - ii. People who use the site will not travel the 9 - 10 miles to Craven Arms
 - iii. People who live in close proximity to the AD plant suffer from the smells associated with the plant when operational
 - iv. Other alternatives need to be considered.

- 6.6 In response to these concerns it was noted that there are other areas of rural Shropshire which do not have a manned facility/ site of this nature for which fly tipping is not a problem in these areas. For example, residents from Ellesmere, Wem and Market Drayton do not have HRCs and have similar travel distances to the nearest HRCs in Oswestry, Whitchurch and/ or Shrewsbury as do residents from Ludlow to Craven Arms or Cleobury Mortimer to Bridgnorth/Craven Arms HRC.
- 6.7 An initial public consultation was initiated on 20th September 2013 inviting responses on the proposed alternatives for future use of the site following its closure. The consultation closed on 21st October 2013 for which there were 74 respondents. Comments received from this initial consultation were however predominantly directed towards opposition to the closure of the site as opposed to future uses.
- 6.8 The reasons opposing the closure included concerns over fly-tipping, Ludlow should have its own recycling centre, losing a local facility and, a perceived drop in the Council's recycling performance from site closure.
- 6.9 Due to the relatively high percentage of respondents opposing the site closure and with no clear preference for alternative site usage identified from the first consultation, a second consultation was initiated. This provided an opportunity to address concerns raised within the initial consultation and to provide further information on the options considered and the Council's budget pressures (Appendix 4).
- 6.10 The second consultation commenced on 12th November 2013 and concluded 24th December 2013. A total of 109 responses were received of which 95 opposed the site closure. In addition, a small number of written responses were received.

Second consultation responses and analysis

- 6.11 Comments regarding opposition to site closure were similar to those received from the initial consultation with the majority of responses citing perceived concerns about fly-tipping of waste, assertions that Ludlow should have its own recycling centre and that travelling distances to Craven Arms are unacceptable for elderly residents. These concerns and viability of alternative suggestions made from the second consultation are summarised and assessed below:
- i. Fly tipping will increase if the facility is closed: This was also a perceived fear associated with a previous Council decision in 2010 to cease the provision of community skips in North and South Shropshire. Monitoring of fly-tipping activity before and after this decision showed no discernable increase in this criminal activity and is therefore not expected after the closure of the amenity skip site as the material from fly-tipping is mostly commercial in nature. However to avoid waste being dumped at the site gates an operator will be stationed at the site post-closure to redirect visitors to alternative sites.
 - ii. Distances to HRCs are unacceptable for local residents: As illustrated in the accompanying briefing paper (Appendix 4) to the second consultation the additional distance travelled to Craven Arms from Ludlow or from Cleobury Mortimer to Bridgnorth is no greater than residents from similar sized market towns with no HRC travelling to their nearest facility. An example includes Market Drayton with a population of 12,000 and a round trip of 24 miles to Whitchurch HRC compared with Ludlow residents (population 9,000) having a round trip to Craven Arms HRC of 17miles or Cleobury Mortimer residents having a 27mile round trip to Bridgnorth HRC.

- iii. Ludlow should have its own recycling centre: With travelling distances to the nearest HRC being similar for residents of market towns across Shropshire, there is no justification to provide a second HRC in Ludlow. Apart from exacerbating the inequality that already exists in providing a staffed facility, the cost implications associated with upgrading the amenity skip site at Coder Road to an HRC are significantly cost-prohibitive and unjustified. The shutting down of the Craven Arms HRC and relocation of this at Ludlow was also suggested but is discounted on the grounds of costs to upgrade Ludlow with no guaranteed planning permission plus decommissioning of the Craven Arms HRC, which is a good performing facility.
- iv. Running the site using volunteers: – The operation of the site requires fully qualified and certified staff to run the site. This is a legal requirement which is monitored by the Environment Agency. Operation of the site will also require haulage of materials and mechanical handling of materials all of which incur a significant expenditure and would be deducted from income received from sale of recyclables. Unless significant investment in upgrading the site is provided as set out in 3.5, costs would be predominantly associated with disposal of residual waste and garden waste.

Alternative suggested future use of the site

- 6.12 In terms of alternative future use of the land occupied by the amenity skip site a total of 85 suggestions were received. These will be taken into consideration with other options for future use.
- 6.13 Trade-off suggestions from site closure were also received which included provision of a free bulky waste collection service and a weekly kerbside collection of garden waste for Ludlow residents. These suggestions result in an inequality of service and would have severe cost implications for the Council.
- 6.14 With regard to the socio-demographic composition of the respondents to both consultations, the majority were male and a predominant age band of 65-74 (30%) and 45-59 (25%). The majority of respondents were also from the SY8 postcode or Ludlow area which represents approximately less than 1% of the Ludlow area population.

7. Conclusions

- 7.1 The findings from the internal review of the amenity skip site at Coder Road showed a comparatively poor recycling performance compared with that of the Council's current HRCs and that, even with substantial investment in the site an upgrade in the facility, this would yield a negligible improvement in recycling performance with no financial benefit.
- 7.2 The main concerns from site closure included a perceived fear of fly-tipping and objection to which is perceived to be excessive travelling distances to alternative existing facilities and a demand for a recycling centre serving Ludlow. The concerns, which were reflected in both consultation responses also do not justify keeping the site open in its current form and are not likely to arise or are not borne out in reality. In any event the perceived benefits do not detract from the inequality of service provision that would be established potentially generating similar requests for other market towns without an HRC to have their own facility. This is impractical and unjustified from a financial perspective and with travelling distances to HRCs across Shropshire from market towns being similar, not necessary.
- 7.3 In conclusion, given the thoroughness and extent of the consultation and responses to this, having considered all of the information, including:
 - i) the responses received to the first and second consultation;
 - ii) the costs and benefits of alternative future uses of the amenity skip site in order to maintain a waste facility on site;

- iii) the implications and costs of £100,000 for keeping the amenity skip site open in its current form, particularly as these costs are not expected to decrease in the future;
- iv) existing service provision within the area and ensuring equality of service provision to Shropshire residents

7.5 Closing the amenity skip site is the recommended option which will assist the Council in meeting its financial challenges and enable the delivery of best practice by use of the nearby modern HRCs which provide a wider range of recycling capability thus reducing the costs of waste management for the Council.

7.6 A programme of measures would be introduced which involve closure of the amenity skip site.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information):

Responses from first and second consultation and letters received

Key Decision: Yes

Included within Forward Plan: Yes

If a Key Decision and not included in the Forward Plan have the General Exception or Special Urgency Procedures been complied with: Yes / No

Name and Portfolio of Executive Member responsible for this area of responsibility:

Councillor Steve Charmley, Portfolio Holder for Business Growth

Local Member:

Councillors Viv Parry, Rosanna Taylor Smith, Tracey Huffer, Richard Huffer, Madge Shingleton, Gwilym Butler, Cecilia Motley

Appendices:

1. Site Closure Assessment
2. Equality Impacts Needs Assessment (EINA)
3. Briefing Paper on review of Coder Road Amenity Skip
4. Briefing paper on second consultation re Coder Road Amenity Skip

Appendix 1: Site Closure Assessment

Operational Risk	Impact of Risk	Mitigation
Fly tipping from closure of the site	There is the suggestion that closure of Coder Road would result in increased amounts of fly tipping in Ludlow. This could result in increased payments for disposal of fly tipped waste and encouraging more fly tipping by its presence.	<p>Ensure the closure of the facility is well publicised and that information is provided to residents notifying them of alternative locations and services for disposal of their waste.</p> <p>Ensure that residents are fully aware of the consequences of fly tipping both during the consultation period and after closure of the facility.</p> <p>NB. There is no evidence to suggest that other parts of the county with only one HRC experience increased levels of fly-tipping compared to South Shropshire. Fly tipping is a criminal offence associated with commercial and industrial rather than household waste.</p>
Negative impact on public perception of the Council	The closure of the site would be seen as a loss of service	Explain need for cost savings and improved recycling via a communications plan.

Equality Impact Needs Assessment (EINA)


Part 1 EINA (initial assessment with preliminary consultation)

Name of policy, procedure, function, project, etc Closure of Coder Road, Ludlow Amenity Skip site.	
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Names (list those involved in carrying out assessment)	Job titles	Contact details
Paul Beard	Waste Contracts Manager	Tel 01743-255996
Date commenced	June 2013	

Aims of the policy and description
The policy aims to provide equality in provision of staffed recycling facilities across Shropshire and improve recycling performance through encouraging greater use of nearby Household Recycling Centres (HRCs) by local residents. This involves the decommissioning of a poorly performing recycling facility to provide opportunities for alternative uses including waste related activity to benefit the local community and to deliver financial savings.

Stakeholders, people concerned, interested parties
Local residents of South Shropshire including Ludlow and environs, local elected members, Town and Parish Councils, local business including Veolia Environmental Services.

Progress summary	Date	Signature
Head of service	Part 1 10/01/2014	
Head of service	Part 2 (FULL)	

Potential Impact on Target Groups – Preliminary Consultation (see page 2)

Assess each of the following areas separately and consider how the policy may affect people's Human Rights

- Have you considered the relevant Protected Characteristics and/or consulted people with specialist knowledge?
- Will the policy create any problems or barriers to any Community or Group?
- Will any group be excluded because of the policy?
- Will the policy have a negative impact on community relations?

If the answer to any of these is **Yes** to any **High Impact criteria**, you must prepare a **Full (Part 2) EINA**. Preliminary consultation will be required to help identify the impact and evidence of this recorded.

Initial assessment (and preliminary consultation)

Protected Characteristic groups	Significant (High) negative impact Full EINA required	Significant (High) positive impact Full EINA required	Medium or Low impact Part 1 EINA only required
Race (also ethnicity, nationality, culture, language, gypsy, traveller)			X
Disability (mental & physical impairments, mobility, manual dexterity, speech, hearing, learning, understanding, visual, MS, cancer, HIV)			X
Sex (also associated aspects: safety, single-parenting, caring responsibility, potential for bullying & harassment)			X
Gender re-assignment (also associated aspects: safety, single-parenting, caring responsibility, potential for bullying & harassment)			X
Sexual Orientation (heterosexual, lesbian, gay, bi-sexual)			X
Age (children, young people, working age, elderly)			Travelling distances to existing waste and recycling facilities impacting on elderly residents based on consultation responses (30% of age band 65-74)
Religion & belief (Hinduism, Judaism, Buddhism, Christianity, Islam, Sikhism, Shinto, Non-conformists)			X
Pregnancy & Maternity			X
Other (other target groups relevant to your service, for example, family carers, marital status, rurality, poverty)			

High	Significant potential impact, risk of exposure, history of complaints, no mitigating measures in place or no evidence available, urgent need for consultation with customers, general public, employees
Medium	Some potential impact, some mitigating measures in place but no evidence available how effective they are, would be beneficial to consult with customers, general public, employees
Low	Almost bordering with non-relevance to the EINA process (heavily legislation led, very little discretion exercised, limited public facing aspect, national policy)

What is your evidence for your answers to the above questions?

Consider quantitative and qualitative data. Customer equality monitoring data, consultation process, research data. Log details in Evidence part of form (page 4)

All existing site users will have access to a nearby HRC with similar travelling distances to these facilities as for those residents in other Market Towns across Shropshire which have no HRC. This will not have any disproportionate impact on any of the Target Groups and does not disadvantage these groups in comparison to other local residents across Shropshire.

Important: Only policy, procedure, function, etc rated as **High Impact** needs a **Full (Part 2) EINA**. Full assessment requires more in-depth consultation with members from the target groups highlighted as being at the receiving end of any potential High Impact.

Appendix 3: Briefing Paper on Review of Coder Road Amenity Skip

Appendix 4: Briefing Paper on second consultation Coder Road Amenity Skip

Declaration of Interest

- I have no interest to declare in respect of this report

Signed Date

NAME:

PORTFOLIO HOLDER FOR:

- I have to declare an interest in respect of this report

Signed Date

NAME:

PORTFOLIO HOLDER FOR:

(Note: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter.)

For the reasons set out in the report, I agree the recommendation(s) in the report entitled ...

REVIEW OF THE AMENITY SKIP AND RECYCLING CENTRE AT CODER ROAD LUDLOW

Signed

Portfolio Holder for

Date

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and pro-forma is returned to Democratic Services for processing.

Additional comment :

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Note: If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, Head of Legal and Democratic Services, Chief Executive and the Head of Finance, Governance and Assurance (S151 Officer) and, if there are staffing implications the Head of Human Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Portfolio Holder: Your decision will now be published and communicated to all Members of Council. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication.