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Environment and Regeneration Overview and Scrutiny Committee

Agenda

Date:	**Monday, 15th March, 2021**
Time:	**10.00 am**
Venue:	**Virtual Meeting via Microsoft Teams**

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The agenda is divided into 2 parts. Part 1 is taken in the presence of the public and press. Part 2 items will be considered in the absence of the public and press for the reasons indicated on the agenda and at the foot of each report.

It should be noted that Part 1 items of Cheshire East Council decision making meetings are audio recorded and the recordings are uploaded to the Council's website

PART 1 – MATTERS TO BE CONSIDERED WITH THE PUBLIC AND PRESS PRESENT

1. **Apologies for Absence**

2. **Minutes of the Previous Meeting** (Pages 3 - 10)

   To give consideration to the minutes of the meeting held on 12 February 2021.

Contact: Helen Davies
Tel: 01270 685705
E-Mail: helen.davies@cheshireeast.gov.uk

3. **Declarations of Interest**

To provide an opportunity for Members and Officers to declare any disclosable pecuniary and non-pecuniary interests in any item on the agenda.

4. **Whipping Declarations**

To provide an opportunity for Members to declare the existence of a party whip in relation to any item on the agenda.

5. **Public Speaking/Open Session**

A total period of 15 minutes is allocated for members of the public to make a statement(s) on any matter that falls within the remit of the Committee.

Individual members of the public may speak for up to 5 minutes, but the Chairman will decide how the period of time allocated for public speaking will be apportioned, where there are a number of speakers.

Note: In order for officers to undertake any background research, it would be helpful if members of the public contacted the Scrutiny officer listed at the foot of the agenda, at least one working day before the meeting to provide brief details of the matter to be covered.

6. **Carbon Action Plan: Update**

To receive a verbal update and discussion around the priorities for next twelve months on actions relating to land allocation and procurements for initial projects contributing to sustainable energy generation and green sequestration.

7. **Household Waste & Recycling Centre- Consultation results and draft recommendations** (Pages 11 - 154)

To review the results of the consultation relating to the Household Waste and Recycling Centre and draft recommendations since the last review on the 12 Feb 2021.

8. **Post Overview and Scrutiny**

An opportunity to enable the Committee to reflect on past pieces of Overview & Scrutiny work, and current priorities in order to inform and advise the incoming Environment & Communities Committee.

9. **Forward Plan** (Pages 155 - 168)

To consider the Forward Plan.

10. **Work programme** (Pages 169 - 174)

To consider the Committee's Work Programme.

CHESHIRE EAST COUNCIL

Minutes of a meeting of the **Environment and Regeneration Overview and Scrutiny Committee**
held on Friday, 12th February, 2021 as a Virtual Meeting

PRESENT

Councillor JP Findlow (Chairman)
Councillor Q Abel (Vice-Chairman)

Councillors L Braithwaite, S Brookfield, J Buckley, T Dean, A Farrall, P Groves, M Hunter, D Jefferay, C Leach and K Parkinson

PORTFOLIO HOLDERS

Councillor Laura Crane, Portfolio Holder for Highways and Waste

VISITING MEMBERS

Councillor Suzie Akers- Smith
Councillor David Brown
Councillor Janet Clowes
Councillor Sally Holland
Councillor Denis Murphy
Councillor Mike Sewart

OFFICERS IN ATTENDANCE

Paul Bayley- Director of Environment & Neighbourhood Services
Helen Davies- Democratic Services Officer
Christopher Hutton- Senior Policy Officer
Frank Jordan- Executive Director of Place
Ralph Kemp- Head of Environmental Services
Peter Skates- Director of Growth and Enterprise

50 APOLOGIES FOR ABSENCE

There were no apologies for absence received.

51 MINUTES OF THE PREVIOUS MEETING

Councillor Suzanne Brookfield raised the point that in the previous minutes, Councillor Ashley Farrall had given apologies and Councillor Hazel Faddes was a substituting Member, however this was not reflected under Apologies for Absence.

RESOLVED:

That the minutes be approved as a correct and accurate record subject to the amendment with Councillor Farrall's apologies.

52 DECLARATIONS OF INTEREST

There were no declarations of interest given.

53 WHIPPING DECLARATIONS

There were no declarations of the Party Whip.

54 PUBLIC SPEAKING/OPEN SESSION

Congleton Town Councillor Robert Douglas attended the meeting and gave a statement on the Household Waste Recycling Centre in Congleton.

Councillor Douglas stated that Cheshire East Council provided a public consultation for the Household Waste and Recycling Centres which he found to be misleading and contradicting information. He noted that May-June 2020, figures were used which is when people were in lockdown and visits to waste sites were restricted. The figures that related to early 2016 came from a time when the Arclid site was still in operation and as a result was misleading. Councillor Douglas surmised that the closure of the Congleton site could result in longer queues, reduced recycling and idling cars.

Mr. Connor Naismith attending the meeting and gave a statement on Flag Lane Baths in Crewe.

Mr. Naismith advised that Flag Lane Baths in Crewe were an important part of Crewe's heritage although they had become a hotspot for Anti-Social Behaviour. Mr. Naismith would like to know what steps Cheshire East Council was taking in regards to regeneration in that area.

RESOLUTION: That

- Councillor Douglas and Mr. Connor Naismith be thanked for their attendance and questions to the Committee today; and
- Frank Jordan, the Executive Director for Place be asked to provide a substantive response in writing for Mr. Naismith

55 HOUSEHOLD WASTE & RECYCLING CENTRE- CONSULTATION RESULTS AND DRAFT RECOMMENDATIONS

Councillor Laura Crane, Portfolio Holder for Highways and Waste introduced this item and advised that it represented the consultation responses on Household Waste and Recycling across the borough, and included the end of lease for the waste site in Congleton.

Ralph Kemp, Head of Environmental Services presented the item to the Committee.

At this point in the meeting, it was noted by the Chairman that there had been no report circulated with the agenda and that several Members had noted this to him.

Ralph advised that this item was scheduled to go to Cabinet in March. He then presented a short presentation that reviewed the outcome of the consultation and the proposed recommendations for debate and discussion.

The key messages for the Committee were that Household Waste and Recycling Centres (HWRC) were within a reasonable distance and free of charge to use for residents within the borough of Cheshire East. Currently ANSA delivered the contract through HW Martin however this contract would be ending in March 2023. The Council were already within an extension period and this could not be extended. Cheshire East Council was looking for future provision.

20% of the waste that CEC processes was from bin banks and HWRC. 80% was collected at the kerbside.

The Municipal Waste Strategy focussed on the management of waste and waste reduction. In order to prepare for the end of the contract the Council commissioned a further review in 2020 to:

- Review the existing service, comparing it with neighbouring and similar authorities;
- Review the wider waste management market to examine existing contracts and delivery arrangements; and
- Model a range of scenarios for the future shape of the household waste recycling centre contract.

In 2018-19 Cheshire East was positioned 14th highest from 345 authorities in England for waste per household

The consultation responses had asked residents to consider 4 scenarios and indicate how strongly the resident supported or opposed each option being considered. From the responses, the top answer was to keep the current service as it is. This would involve the replacement of Congleton HWRC when the lease on the current site expires in September 2021.

In considering the draft recommendations the following items were key issues:

- The commissioning of a new contract for the delivery of the Household Waste Recycling Centre service in the borough by the end of March 2023.
- It was anticipated that the cost of the new contract will increase significantly owing to volatility in the market for recyclables.
- The lease for the current Household Waste Recycling Centre in Congleton would expire in 2021. Not delivering a new facility in Congleton would deliver a reduction in the future running cost of the HWRC service and so partly mitigate the anticipated increased cost of the new contract. Furthermore, it would avoid the cost associated with repaying the capital investment required to deliver a new facility at Congleton which is estimated to be £250k per annum.

- Therefore a proposal was to not replace Congleton Household Waste Recycling Centre at the end of the current lease in Sept 2021.
- The nearest alternative sites would be in Alsager and Macclesfield.
- Once procurement was undertaken, there maybe a need to consider further site closures.

Ralph advised that there was the option for comments as part of the consultation. There had been some emerging themes that included: the concern on the environmental impacts and that the removal of the Congleton HWRC may cause such as: fly tipping, increased car journeys, queuing, misuse of kerbside recycling, increased drive time, costs to other sites, vulnerable people could struggle to travel, and the increase of demand with new homes being built in the area.

There would be an 18-month lead time to procure a contract and this is the point at which procurement needed to begin. Once procurement is undertaken, the number of sites may need to be looked at again.

The Committee were invited to ask questions and there was some discussion about, if Congleton and Poynton sites were to close, had any analysis been done to show neighbouring sites have the capacity to take on the additional displacement this would cause and also how close Congleton would be to achieving 50,000 of houses (per Waste Site) with additional houses being built.

Ralph advised that of the scenarios consulted on, scenario four was the one whereby Poynton and Congleton close, he agreed to send the analysis data to the Committee outside of the meeting.

There was some discussion about the previous ownership of the Waste site in Congleton and whether the Borough Council had sold it, only for Cheshire East to now be renting it back, it led to questions about the other potential sites not owned by Cheshire East Council.
Ralph confirmed Congleton is the only one not owned by Cheshire East Council.

The Committee questioned why a longer lease hadn't been secured and agreed that the presentation posed more questions and overall did not contain the level of information to enable Members to make an informed decision.

Innovative opportunities were discussed such as the introduction of mobile waste sites or skips or a new site at Arclid so as not to reduce the service.

Ralph advised Cheshire East Estates team have negotiated as much as possible however the current owner felt the site has more potential as a retail development but different sites had been considered.

The Committee considered the new Cheshire East Corporate Strategy had three themes running throughout the document- Fairer, Cleaner and Greener.
There was some discussion that the south of the borough had never been equitable or fair in relation to Household Waste Sites and the potential that cars will be travelling further and the risk of flytipping was not in line with a green agenda.

The Chairman opened up the question for visiting Members. Councillor Janet Clowes noted that the consultation was not yet available on the website as all results should be, and that whilst there had been good uptake in responses, Members needed to know what the comments, trends and themes were in order to check the recommendations are sound. Councillor Clowes felt that the consultation had been too narrow, not innovative and not considered other possible options or radical rationalisation of sites for a specific service.

Ralph advised he will work to get the full consultation on the web.

Councillor David Brown asked if there was a possibility of Cheshire East Council buying the site from the current owner.

Ralph advised the Council was unable to extend the current lease or remain there and that the Councils asset team did negotiations so a written response would have to follow.

Councillor Mike Sewart made a comment that potentially the north of the borough could see a large amount of residents travelling to waste sites there.

The Committee considered their recommendations to Cabinet and concluded that these decisions had to be made because there isn't enough money in the Council budget. That being said, there was agreement that:

- there was not enough information to make an informed decision to scrutinise properly; and
- there was little innovation show towards a joined up solution.

The Committee voted in favour of a recommendation that Cheshire East Council requests to buy the current site in Congleton with a sensible offer given the current economic situation and strong resident voice as seen in the consultation.

Councillor Laura Crane assured the Committee that its comments had been noted and there would be consideration taken as to whether there could be any further opportunities to scrutinise this item.

RESOLVED: That

- Ralph Kemp be thanked for his attendance and presentation;
- Ralph to feed back the data analysis of if neighbouring waste sites had the capacity to take on the additional displacement if Congleton and Poynton sites were to close;
- That Cabinet be advised that this Committee recommend Cheshire East Council request to buy the current site in Congleton with a sensible offer given the current economic situation and strong resident voice as seen in the consultation; and
- Councillor Laura Crane explore any possibilities for this item to come back to this Committee for further scrutiny ahead of review by Cabinet.

56 HOUSING: CONSULTATION UPDATES

Peter Skates, Director of Growth and Enterprise introduced the item and , Senior Policy Officer Chris Hutton provided the Committee with an overview on the

Vulnerable and Older Persons Housing Strategy 2020-2024 and the Tenancy Strategy, the Cheshire East approach to consultation, an update of the consultation for both strategies including amendments and the approach to adoption.

The Committee heard that the Vulnerable and Older Peoples Housing Strategy was not a statutory document, Cheshire East has one as part of a good practice document. There were three main priorities to the strategy:

- People are supported to live in their own homes independently for longer;
- When required, people can receive the support they need in a wide range of specialist, supported accommodation within the Borough; and
- People are able to make informed choices about the accommodation, care and support options within Cheshire East.

The Committee heard that the Strategic Housing Team had sought legal advice regarding the running of the consultation during lockdown. During the early days of the pandemic, government guidelines were more restrictive and so the consultation ran for eight weeks and was then extended for another 4 weeks, in total it ran from May- August 2020. The consultation consisted of an online survey and questionnaire and did incorporate recommendations given from Health, Adult Social Care and Communities Overview and Scrutiny Committee.

There had been 32 responses to both consultations plus additional emails, the focus was now on the next steps and adoption of the strategy and were:

- A review of the actions for each cohort;
- Significantly improved 'Supported Living' sections for learning, disability and mental health;
- The impact of Covid-19 and the response from Cheshire East Council; and
- Adoption by Portfolio Holders.

The Committee were given the opportunity to ask questions, and there was some discussion about the 32 responses given to the consultation. Chris explained that this was in line with previous responses to similar strategies.

The Committee requested a tracked version of the consultation document to see the context of any alterations as a consequence of the consultation views.

Chris then gave another short presentation on the Tenancy Strategy.

This is a statutory document but Registered Providers only have to take due regard to it and aren't bound by it. The strategy focused on the types and circumstances of tenancies, including fixed term and circumstances that granted any extensions.

The Tenancy Strategy consultation ran from Oct-Jan 2021 and took the form of an online survey and questionnaire.

Chris explained that Pre-Covid the team would have engaged with face to face meetings would have had breakout rooms for smaller focused groups.

The next steps and adoption for the Tenancy Strategy were:

- Review of comments that related to Domestic Abuse;
- Updated figures;

- Acknowledgement of figures that related to Anti-Social Behaviour (ASB)/rent arrears and clarifying the processes that are used to manage this; and
- Adoption by Portfolio Holder

The Committee were given the opportunity to ask questions, and there was some discussion that included:

- Registered Housing Providers take due regard to the Tenancy Strategy, despite the fact that they don't need to follow it. Registered Housing Providers were engaged with during the drafting of the strategy and advice was sought on current working practices;
- That the Registered Housing Provider has the authority to grant provision for people taking pets into social housing;
- That the strategy is renewed as required, it has been nine years since the last one; and
- Clear communication and pathways for tenants that included expected behaviours and actions by the tenant.

RESOLUTION:

- That Peter and Chris be thanked for their attendance today and for the presentations to this Committee; and
- That Chris circulate a tracked version of the consultation documents to see the context of any alterations as a consequence of the consultation views.

57 **FORWARD PLAN**

Consideration was given to the Forward Plan.

RESOLVED- That the Forward Plan be received and noted.

58 **WORK PROGRAMME**

Consideration was given to the Work Programme.

The Chairman noted that the March meeting would be the last for this Committee before the Council moves into a Committee System style of governance.

Councillors Peter Groves and June Buckley advised the Committee that the Task and Finish Group meetings from this week had been very excellent and informative and extended their thanks to the Chairman and Democratic Services for arranging them.

RESOLVED- That the Work Programme be received and noted.

The meeting commenced at 2.00 pm and concluded at 4.35 pm

Councillor JP Findlow (Chairman)

Working for a brighter future together

Version Number:2.4

Key Decision Y

Date First Published:

Cabinet

Date of Meeting: 13th April 2021

Report Title: Household Waste Recycling Centre Provision

Portfolio Holder: Cllr Laura Crane – Highways and Waste

Senior Officer: Frank Jordan-Executive Director of Place

1. Report Summary

1.1. Cheshire East Council is responsible for the management of all household waste within the Borough. This means making reasonable provision for a range of waste management services which enable waste to be re-used, recycled or composted wherever possible, and only disposed of as the last option. Approximately 80% of household waste is collected from the kerbside. The remaining 20% is collected through our household waste recycling centres and bring banks.

1.2. Councils are required to provide Household Waste Recycling Centres (HWRCs) which are reasonably accessible to the public. These provide an important waste management service to enable householders to dispose of, and recycle their excess waste responsibly. The Council currently operates 8 centres across the borough. The current contract for the delivery of these services ends in March 2023. It is to be noted the current facility in Congleton operates on a site leased by the Council which is due to expire in 2021. All other sites operate on land that is under the ownership of the Council.

1.3. Minimising waste in the first place is by far the best environmental and economic solution to tackling waste management. The Council's Municipal Waste Strategy, which was approved by Cabinet in 2014 (reviewed 2020) sets out the aims and objectives for the management of waste within the Borough. The strategy acknowledges the national policy direction and legislative pressure to minimise the overall amount of waste produced and to be more responsible in the way waste is managed. Furthermore, the Council's Environment Strategy, which was

approved by Cabinet in May 2020 has waste reduction as one of its strategic objectives.

1.4. To assist in the commissioning of a new contract the Council has undertaken a review of the current service provision in the Borough. This outlined that the current provision compares favourably with neighbouring and similar authorities to Cheshire East.

1.5. In November 2020, Cabinet considered the findings of this review and agreed that a public consultation on the options for the future pattern of provision for HWRCs should be undertaken. The consultation reported that most residents supported the option to keep the current service provision pattern. Notwithstanding the feedback, the lease on the Congleton HWRC site expires in 2021 and so a timely decision is required on future provision in Congleton.

1.6. A key consideration for the commissioning of these facilities from 2023 onwards will be the cost of running such facilities in the future which are expected to rise considerably owing to the volatility of the global market for recyclables. Furthermore, keeping the current pattern of service provision across the council would require the council to fund the capital costs associated with replacing the current facility in Congleton. The costs of replacing this facility are estimated to be at least £4m. The council would need to finance this through borrowing and the repayments would lead to an annual cost of at least £250k over 25 years.

1.7. Therefore, this report seeks approval for a revised distribution of 7 HWRCs across the borough by confirming that Congleton HWRC will not be replaced when the lease at the current site expires this year. This would:

1.7.1. Reduce the future running costs of the service, which are expected to rise, therefore improving value for money for the service in the future

1.7.2. Avoid the Council having to find a further £250k of revenue to cover the costs of capital associated with providing a facility in Congleton which is particularly relevant given the ongoing challenges to the Council's finances

1.7.3. Still enable the council to provide a pattern of service provision which more than meets the required minimum level

1.7.4. Supports the Council's Environment Strategy and Municipal Waste Strategy which both have strategic aims of reducing waste across the Borough.

1.8. An environmental appraisal seeking to assess the impacts of the proposed closure of Congleton HWRC is contained in Appendix 4 of this report. The report concludes that 'the residual impact of closing the Congleton HWRC ranges between minor beneficial to minor adverse' and makes a number of suggestions

to reduce these impacts. The Council will monitor usage and consider measures to minimise congestion at Macclesfield and Alsager sites.

1.9. There is a risk that the revised distribution will not fully mitigate the increased cost of running the remaining HWRCs through the new contract. Once market testing of the new contract has been undertaken, it may be necessary to consider further the distribution of sites to deliver the service at an acceptable cost. However, these considerations would be subject to further consultation and a decision that would be taken under the committee system of governance.

2. Recommendations

2.1. That Cabinet:

2.1.1. Notes the lease on the current Congleton Household Waste Recycling Centre expires in September 2021.

2.1.2. Confirms that a replacement Household Waste Recycling Centre will not be provided in Congleton.

2.1.3. Approves a revised distribution of 7 Household Waste Recycling Centres for the Borough, noting that this will provide a good level of service provision across Cheshire East.

2.1.4. Approves the procurement of the new contract and notes that a further decision will be sought to award the contract, confirm the distribution of Household Waste Recycling Centres and their cost.

3. Reasons for Recommendations

3.1. This decision would support the aims of the Council's Environment Strategy and Municipal Waste Strategy in relation to waste reduction.

3.2. A new contract for the delivery of the Household Waste Recycling Centre service in the Borough will need to be commissioned by the end of March 2023. It is anticipated that the cost of the new contract will increase significantly owing to volatility in the global market for recyclables.

3.3. The lease for the current Household Waste Recycling Centre in Congleton expires in September 2021. Not replacing the current facility in Congleton would reduce the future running cost of the HWRC service and so partly mitigate the anticipated increased cost of the new contract. Furthermore, it would avoid the cost associated with repaying the capital investment required to deliver a replacement facility at Congleton which is estimated to be £250k per annum.

3.4. It is acknowledged that this proposal could result in longer journeys for some residents and an increase in carbon emissions from those journeys. However, the Council's Corporate Plan and Environment Strategy prioritise waste prevention, reduction and reuse over recycling and disposal, and so this may

encourage residents to reduce the amount of waste they produce. Analysis of waste levels at surrounding sites following the closure of Arclid HWRC in October 2017 suggests not all the waste transferred to surrounding sites with no significant increase in fly tipping and hence an overall waste reduction.

3.5. The revised distribution of 7 HWRCs would result in 96% of Cheshire East households being able to reach a site within a 20-minute drive. There would be approximately one HWRC per 27,000 households and 54,400 residents which remain well within the WRAP guidelines set out below.

4. Other Options Considered

4.1. There were a range of service provision options that were consulted on in the exercise undertaken.

4.2. The Council could construct a replacement HWRC in Congleton, but this is estimated to cost £4m plus site acquisition costs and the annual cost of the capital investment would have to be met from the council's revenue budget. This would mean that savings would need to be found from elsewhere in the budget to accommodate this.

5. Background

5.1. The Council has a statutory duty to provide Household Waste Recycling Centres free of charge and that are reasonably accessible to residents.

5.2. The Council currently operates 8 Household Waste Recycling Centres in Alsager, Bollington, Congleton, Crewe, Knutsford, Macclesfield, Middlewich and Poynton. The delivery of the service is managed on behalf of the Council by ANSA Environmental Services, a company wholly owned by the Council, with site operations undertaken by HW Martin Ltd and the subcontracted Site Managers.

5.3. The current Household Waste Recycling Centre contract will end on March 31st 2023. A 5-year extension was actioned in 2018 and therefore there is no option to extend the current contract further.

5.4. The current facility in Congleton is on a site that is leased by the Council. The owner of the site has informed the Council that they will not consider a renewal of the lease. The replacement of such a facility is estimated to cost £4m plus site acquisition costs which would need to be funded from the capital programme with the annual cost of the capital investment having to be met from the council's revenue budget at an estimated £250k per annum.

5.5. An extensive review of the efficiency of the Household Waste Recycling Centres service in 2016 led to the closure of a site, a reduction in the opening hours, the introduction of a charge for disposing of rubble/construction waste and the opportunity for small traders to use our sites.

5.6. In order to prepare for the end of the contract the Council commissioned a further review in 2020 to:

- Review the existing service, comparing it with neighbouring and similar authorities
- Review the wider waste management market to examine existing contracts and delivery arrangements
- Model a range of scenarios for the future shape of the household waste recycling centre contract.

5.7. It is to be noted that the Waste and Resources Action Partnership (WRAP) published an HWRC Guide in 2012 which recommended that the distribution of centres should:

- Be at 50,000 households per HWRC or less
- Be at 120,000 residents per HWRC or less
- Enable driving times to HWRCs to be up to 20 mins for the great majority of households in good traffic conditions (30 minutes in very rural areas).

5.8. In Cheshire East, the current provision equates to one HWRC per 24,000 households and 47,600 residents, more than twice the recommended distribution. 98% of households can reach a site within 20 minutes in normal traffic. The review highlighted that the current service also compares favourably with neighbouring and authorities that are similar to Cheshire East. This suggests that there is a potential over provision of sites within the borough.

5.9. Residents were consulted on the scenarios identified in the review and asked how they felt about the options being considered and what they considered the impact would be on them. Over 10,200 responses were received. As **Error! Reference source not found.** and 2 show, most residents supported the option to keep the current service provision pattern.

Figure 1 How strongly do you support or oppose each option being considered

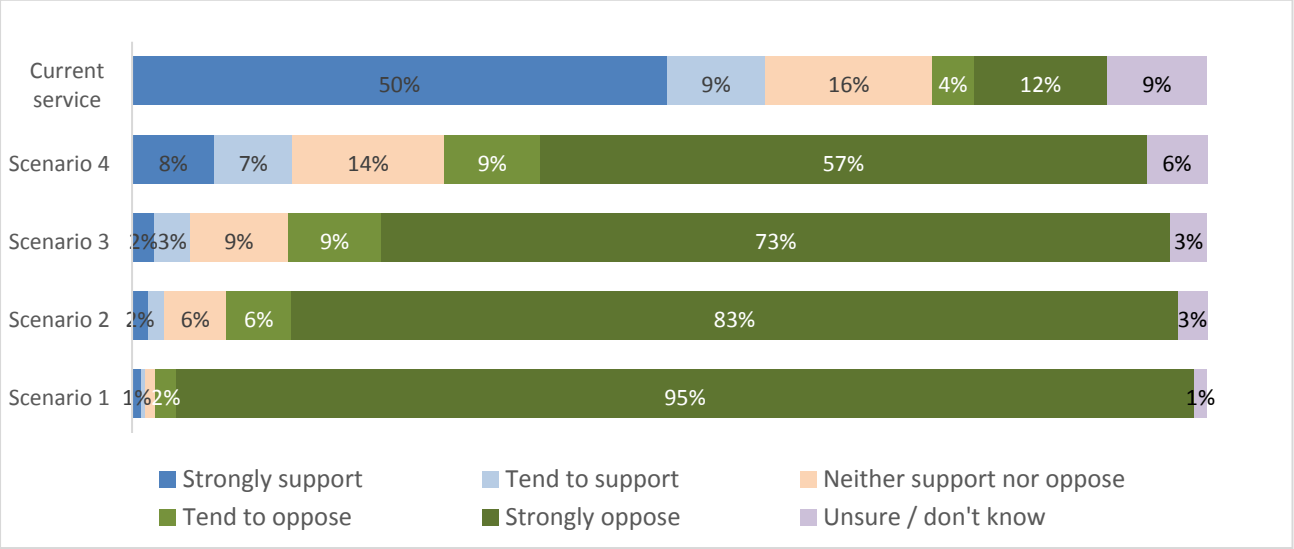
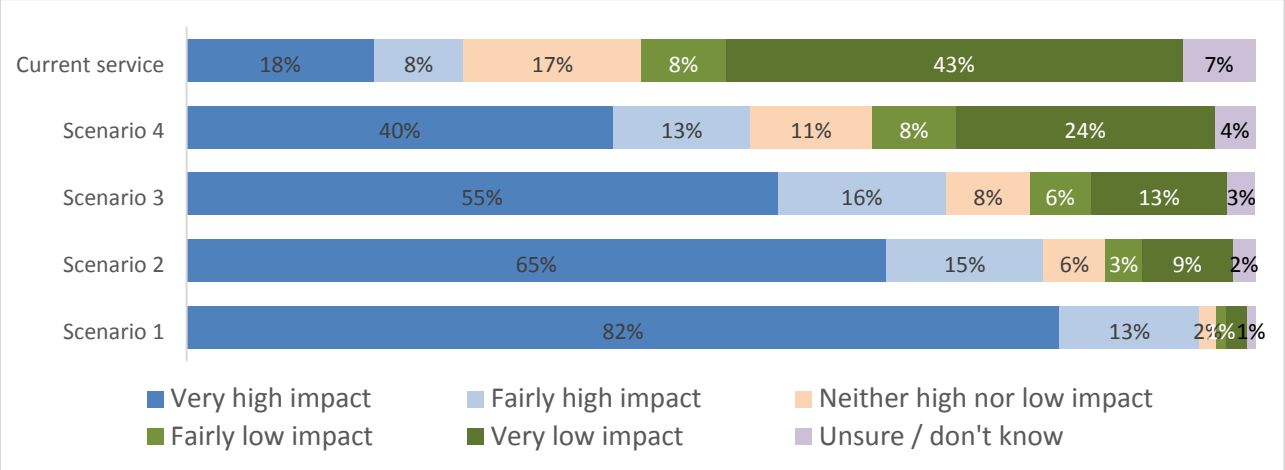


Figure 2 What impact would each option have on you personally?



5.10. Respondents to the consultation were asked to provide comments on what the Council may need to consider as part of this review. The top themes emerging from the comments concerned the environmental impacts that closing sites may cause including fly tipping, increased carbon emissions from longer journeys, pollution and congestion from queuing to access sites, misuse of kerbside bin collections and reduction in recycling rates. Other concerns included the increased time / cost it would take to travel to an alternate site including increased difficulty for those of an older age/ the disabled and increase in demand due to new houses being built. These matters are addressed in the Environmental Appraisal in appendix 4.

5.11. In addressing residents' concerns highlighted in the consultation, an environmental appraisal has been undertaken which can be found in appendix four of this paper. The report concludes that, 'the residual impact of closing the

Congleton HWRC ranges between minor beneficial to minor adverse'[1] and summarises the impacts in the table below:

SEA Objective	Assessment	Impact	Possible Mitigation	Residual Impact
Population & Human Health Material Assets	**Transportation**	Moderate Adverse	Bring sites. The management of fairer access systems.	Minor Adverse
Air Quality Population & Human Health	**Air Quality**	Neutral	N/A	Neutral to Minor Beneficial
Climate Factors	**Climate Change**	Moderate Adverse	Bring sites. Infrastructure Improvements.	Minor Adverse
Population & Human Health	**Amenity**	Neutral	Signage and CCTV	Neutral
Employment Social Inclusion	**Socio Economic**	Minor Adverse	Redeployment and infrastructure improvements.	Neutral
Population & Human Health Material Assets	**Future Demand & Recycling**	Minor Adverse	Bring sites. The management of fairer access systems. Wider infrastructure improvements.	Neutral

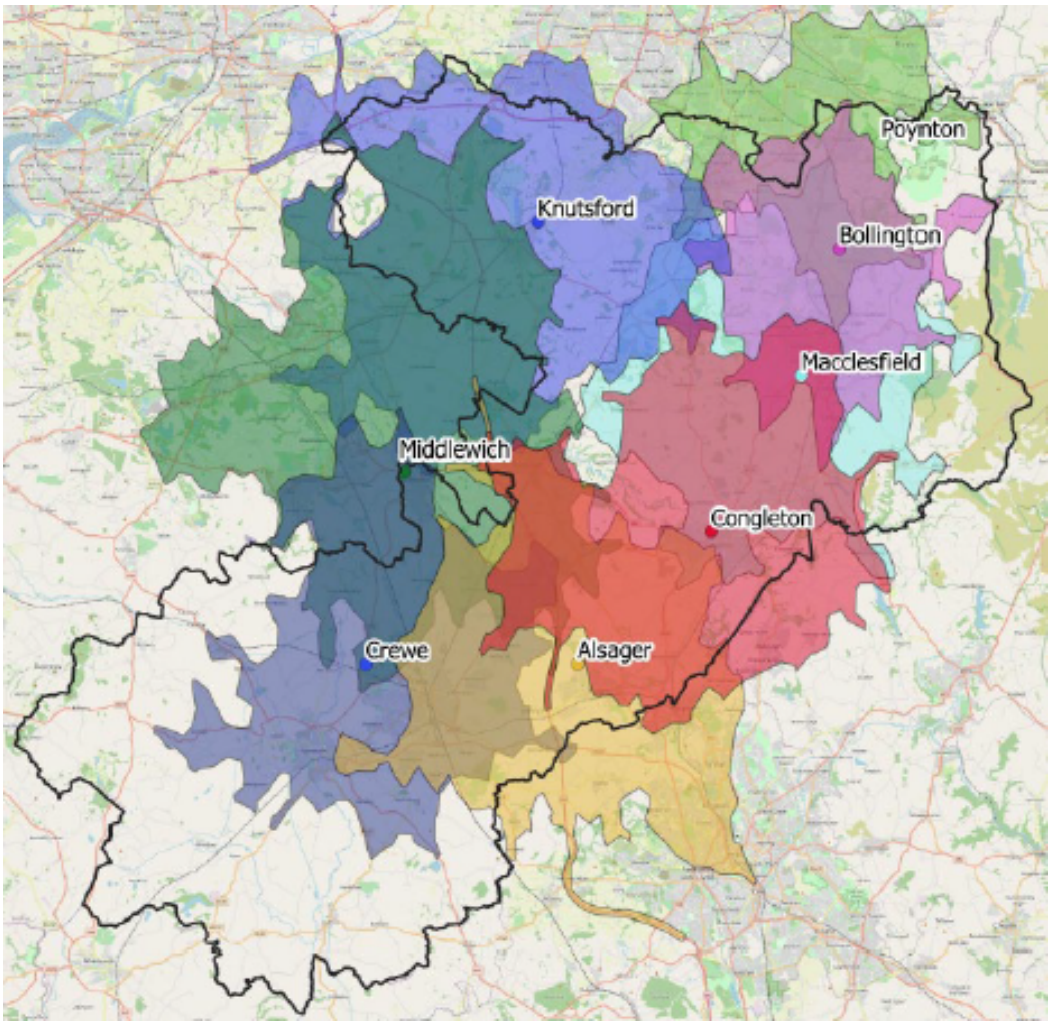
5.12. The appraisal proposes a number of mitigation measures to limit the impacts of closing Congleton. These consist of the provision of additional bring sites in locations 8km or more from the alternate HWRC.; CCTV and signage at Congleton, on closure, to deter against fly tipping; managing fairer access; review of potential to redeploy staff; and to monitor the effects of the closure and review progress of broader improvements outlined within the Waste Strategy. The Council will monitor usage and consider measures to minimise congestion at Macclesfield and Alsager sites.

5.13. Notwithstanding these risks, the key consideration in relation to the future service provision is the future costs of running HWRCs. It is anticipated that the cost of the new contract will increase owing to volatility in the market for recyclables. Not replacing the current facility in Congleton would deliver a reduction in the future contract cost of the HWRC service. Furthermore, it would

[1] Resource Futures, *Environmental Appraisal of closure of Congleton HWRC* (2021) p 39

avoid the cost associated with repaying the capital investment required to deliver a new facility at Congleton which is currently estimated to be £250k per annum.

5.14. If Congleton HWRC were not replaced the nearest alternative sites would be in Alsager and Macclesfield. As the map below illustrates, there is currently significant overlap in catchment areas in this area of the borough. Alsager or Macclesfield HWRC is within a 15 minute drive time for the majority of Congleton households.



Current HWRC network and 15-minute drive times

5.15. The closure of Congleton HWRC would result in 96% of Cheshire East households being able to reach a site within a 15 minute drive. There would be approximately one HWRC per 27,000 households and 54,400 residents which remain well within the WRAP guidelines set out in 5.7 above.

5.16. However, there is a risk that the proposed closure of Congleton HWRC will not fully mitigate the future increased contract cost of operating the remaining HWRCs. Once market testing of the new contract has been undertaken, it may

be necessary to consider further rationalisation and review to ensure the service can be delivered within the available budget.

5.17. In addition, the new service will investigate technological solutions to ensure a fair use policy such as use of number plate recognition to ensure sites are accessed by Cheshire East residents only. The service will also investigate the potential of a mobile 'pop up' household waste service provision to provide fairer access to waste disposal for communities who are currently disadvantaged. There are examples such as North Yorkshire County Council and Conway County Borough Council providing a mobile service to rural areas which could be a model for our future service provision.

6. Implications of the Recommendations

6.1. Legal Implications

6.1.1. Councils must provide Household Waste Recycling Centres. Under Section 51 of the Environmental Protection Act 1990… it shall be the duty of each waste disposal authority to arrange … for places to be provided at which *persons resident in its area* may deposit *their* household waste (1) (b). They must be reasonably accessible to persons resident in its area (2) (a), open at reasonable times, including Saturday and available *free of charge by persons resident in the area* (2) (c)

6.2. Finance Implications

6.2.1. It is anticipated that the cost associated with running HWRCs will increase owing to volatility in the market for recyclables. At this stage it is to be noted that the future cost of a contract is a future financial risk and will not be known until a new contract has been awarded. Therefore, the Medium Term Financial Strategy (MTFS) for 22/23 onwards will need to reflect the anticipated increase in costs for the 2023/24 financial year together with proposals on how the overall budget can be balanced.

6.2.2. The Council's MTFS Capital Addendum contains £4 million for the construction of a new Congleton site, however projects in the capital addendum are still subject to business case approval, in particular considering how the cost of the capital investment would be repaid.

6.3. Policy Implications

6.3.1. Household Waste and Recycling Centres support the vision within the Corporate Plan for an open, fairer, greener Cheshire East. The service helps to protect and enhance our environment by enabling the responsible recycling and disposal of waste. The proposal to investigate the feasibility of a mobile 'pop up' household waste service provision will help to provide fairer access to the service for all.

6.4. **Equality Implications**

6.4.1. An equality Impact assessment has been undertaken and is included in Appendix 3. The closure of Congleton HWRC will impact all households that currently use the site, but the impact will be the same for all users because all must drive to their nearest HWRC. The current service does not accommodate residents who have no vehicle access, but the new service will seek to provide greater access through additional bring sites and a potential new mobile service.

6.4.2. Concerns were raised in the consultation process about older and less physically able site users having an issue driving further to access a site. The environmental appraisal identifies that the existing facility contained stepped gantry access to the skips that was not considered to be accessible and that an additional drive of 5 to 10 minutes did not introduce an impediment to users of the site who already drive and load/unload their vehicles. Both Alsager and Macclesfield offer a site that is on a single level with no gantries to negotiate with easy access to the skips.

6.5. **Human Resources Implications**

6.6. The proposal has no effect on Cheshire East and Ansa staffing but may result in staff implications for the household waste centre contactor. .

6.7. **Risk Management Implications**

6.7.1. There is a risk that following soft market testing that an alternative operator will not deliver what we are seeking but we will address this through a thorough commissioning and procurement process that will ensure a quality service.

6.8. **Rural Communities Implications**

6.8.1. Travel times for some rural residents will increase and though these are within acceptable limits in line with national guidance, the Council recognises this possibility and will seek to provide alternative, mobile facilities in the new contract.

6.9. **Implications for Children & Young People/Cared for Children**

6.9.1. There are no implications for children and young people.

6.10. **Public Health Implications**

6.10.1. The Council recognises that some residents will be required to make longer journeys, thus increasing vehicle emissions, to access a centre but anticipate that because of the greater distances that residents will make fewer journeys. The environmental appraisal identifies that in overall terms, based on the information available, it is considered unlikely that there will be any material difference in the concentration of traffic pollution (nitrogen

dioxide) in the Air Quality Management Areas in Congleton as a result of traffic redistribution. It is therefore concluded that the closure would have a neutral effect on local air quality.

6.10.2. Regarding fly-tipping, the appraisal notes that there is no evidence to suggest that the closure of a household waste recycling centre leads to an increase in litter and fly-tipping. A minor adverse effect has been assumed in the short term if members of the public drive to Congleton and find the site closed, fly tipping instead of travelling to an alternate site.

6.11. **Climate Change Implications**

6.11.1. Given the significant change in recycling since the previous contract was procured, we anticipate that site performance will be improved and the opportunity to reuse and recycle enhanced.

6.11.2. The environmental appraisal has assumed a complete re-distribution of trips across the network as a worst case, in reality (prior to any mitigation measures being employed) the number of trips is likely to reduce with residents making fewer trips but with larger quantities of materials. Notwithstanding this, overall, the development will have a moderate adverse effect as it will result in higher carbon emissions associated with transport emissions than if the HWRC remained open.

7. Ward Members Affected

7.1. Wards affected

- Congleton East – Cllrs D Brown, R Moreton, D Murphy
- Congleton West – Cllrs S Akers Smith, G Hayes and S Holland

8. Consultation & Engagement

8.1. A full borough wide consultation was carried out in which a range of options for future service provision were considered – there were over 10,000 responses.

9. Access to Information

9.1. The review of the Cheshire East HWRC Network is provided as appendix 1.

9.2. The consultation report is provided as appendix 2.

9.3. The Equality Impact Assessment is provided as appendix 3.

9.4. The Environmental Appraisal is provided as appendix 4.

9.5. The Municipal Waste Management Strategy 2030 and Household Waste and Recycling Centres Review can be accessed from the Council website here.

10. Contact Information

10.1. Any questions relating to this report should be directed to the following officer:

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Review of Cheshire East Council HWRC network

Cheshire East Council

July 2020

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Limitations

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Executive Summary

Introduction

Resource Futures was commissioned to carry out an update to a previous review and consider the options available to the Council for the future shape of the household waste recycling centre contract. With the contract ending in early 2023 the Council sought independent expert advice on the ways forward. CEC is aware that the current contract cannot simply be replicated and that national and international changes in the waste sector need to be considered. The volatility of the recycling market has severely impacted the planned income from these materials, and therefore future contracts may incur higher costs. The Council is seeking to understand the best contract model.

Contract procurement options

A comparison of the performance of the current contract alongside neighbouring and similar authorities recognised the range of contracts that are available; an evaluation of some working options was carried out. It is important to acknowledge that any contract options are going to be affected by the recent government Resources and Waste Strategy and the legislation which will result from it. The legislative environment means that the conditions within the waste management sector will be uncertain until at least 2023, when the majority of the initiatives are due to be implemented. Additionally, the situation on the international material markets means that the prices of materials are currently low. This suggests that the contractors bidding for any HWRC contract will be cautious while Local Authorities will need to build flexibility into contracts, which is likely to result in additional costs to operate services.

The analysis of the options available to the Council reveals that there are a number of key points that officers will need to consider before commencing the procurement process including appetite for risk, utilising the LA owned company, partnership work with the neighbouring authorities and the investment in infrastructure needed. The different operating models all have pros and cons so it is not possible to recommend one over another. In any case, it will be crucial to ensure that any future procurement exercise and contract documents (specification, payment mechanisms and incentives/penalties) are clearly set out to ensure best value is achieved for the Council.

Comparing the current service

To provide an informed understanding of the current service provision and its performance, a comparison was made with neighbouring authority sites and authorities that are similar to Cheshire East. On many of the measures used the provision is clearly highly rated and compares favourably, however with the contract due for renewal there is a need to ensure that the service is fit for purpose. The previous review revealed that the service provision was generous and therefore in order to determine the most efficient combinations of sites, Resource Futures was tasked with modelling four different scenarios that involved the closure of some sites. Could the Council operate more effectively by operating fewer improved sites and still deliver the same level of service?

Table E 1 below shows the scenarios modelled.

Table E 1 Network options scenarios

Site	Current	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Alsager	✓		✓	✓	✓
Bollington	✓			✓	✓
Congleton	✓				
Crewe	✓	✓	✓	✓	✓
Knutsford	✓	✓	✓	✓	✓
Macclesfield	✓	✓	✓	✓	✓
Middlewich	✓				✓
Poynton	✓				

Impact on distance and travel times

The current provision offers the best coverage in terms of the shortest drive times for residents, as indicated in the table below, however both scenario 3 and 4 offer 96% of all properties less than a 20-minute drive to their nearest HWRC. In scenario 3 and 4, only 4% of households are required to drive for more than 20 minutes to reach their nearest site and in scenario 4, the majority (96%) are able to reach their nearest HWRC within 20 minutes by car.

Table E 2 Proportion of households in each of the drive time bands for each scenario

	Proportion of Households				
Scenario	**Less than 5 minutes**	**Less than 10 minutes**	**Less than 15 minutes**	**Less than 20 minutes**	**More than 20 minutes**
Current	22%	63%	91%	98%	2%
Scenario 1	11%	37%	68%	88%	12%
Scenario 2	13%	43%	78%	93%	7%
Scenario 3	15%	48%	82%	96%	4%
Scenario 4	17%	52%	86%	96%	4%

The analysis shows that a reduction in the number of sites, whilst having a localised impact, does not present a problem for the vast majority of residents. This understanding informs the preparation of the contract procurement since there may need to be flexibility within the contract to accommodate a reduction in sites if this is shown to be the most effective means of delivering a high-quality service. It is unlikely that the number of sites is a factor in how attractive the contract is to the market. The key considerations in the short term will be connected to the material markets and how this will impact the affordability of the contract.

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1 Introduction

1.1 Cheshire East HWRC network

Cheshire East Council (CEC) is a unitary Authority with a population of 370,100 and an area of 116,638 hectares. The Borough was created in April 2009 when Cheshire County Council and all borough councils within the County ceased to exist and was replaced by Cheshire East and Cheshire West and Chester Unitary authorities.

The Council operates 8 Household Waste Recycling Centres (HWRC). The delivery of the HWRC service is currently managed on behalf of Cheshire East Council by ANSA Environmental Services, a company wholly owned by Cheshire East Council, with site operations being undertaken under contract by HW Martin Ltd and the subcontracted Site Managers. The Site Managers are responsible for employing and managing site staff, provision of adequate Certificate of Technical Competence cover on site, site security and site cleanliness. The individual site managers are also responsible for the provision of suitable containers for the collection and storage of non- ferrous metal and reusable bric-a-brac, and a significant part of their payment for operating the sub contract comes from the right to remove and sell this non-ferrous material and bric-a-brac. HW Martin retain responsibility for ensuring the HWRC are operated in line with contract requirements, and for providing outlets for all material deposited at the site, bar the aforementioned reusable material, non-ferrous metal, and non-recyclable material, (which HW Martin are paid to haul to disposal sites operating under the Council's primary waste disposal contract). This contract is in place until March 2023.

In 2016 Resource Futures was commissioned to carry out a review of the service and as a result of this work the Council implemented the following changes to the service provision:

- Site closure (Arclid)
- Reducing hours at all sites from an average of 10 to 8 hours per day
- Introducing a rubble/construction waste charge that has resulted in total throughput at sites dropping by 25%
- The opportunity for smaller traders to deposit rubble at the Council's sites

1.2 Cheshire East Municipal Waste Management Strategy

In 2014 CEC published a Municipal Waste Management Strategy, identifying how it plans to manage waste up to 2030. The Strategy included a recommendation to undertake a review of the HWRC network and identified that less than 20% of the borough's household waste is taken to the HWRCs. An objective of the Strategy was to maintain the role of HWRCs in collecting bulkier wastes and maximising the recycling and re-use of these items. It also indicated that CEC *"will examine the use of Third Sector Organisations as potential off takers for the re-use of bulky waste and WEEE collected at HWRCs*". The Strategy also suggested that CEC investigates the management of commercial and industrial waste through provision of a dedicated commercial waste recycling centre in order to meet CECs aspirations of serving the business community and improving overall waste management. Re-use and commercial waste were therefore considered within the 2016 review resulting in the acceptance of rubble/construction waste from small traders at all sites. This was deemed to be a more cost effective action than creating a single site dedicated to trade.

In 2020 the Council carried out a review of the Waste Management Strategy, taking into account the Government's Resources and Waste Strategy. The review was due to be consulted with the public, but this is currently put on hold due to the Covid-19 pandemic.

The review included two updated targets which are particularly pertinent to HWRCs:

- *Having exceeded the national targets for recycling of 50% by 2020, to work towards the new national target of 65% by 2035.* HWRCs will need to contribute to achieving this target.
- *To utilise waste that cannot be reused or recycled as a resource for energy generation.* The sites are separating the residual material delivered by the residents to ensure that the bulky waste items can be shredded and sent for energy recovery.

1.3 Aims and objectives of this review

Resource Futures was commissioned to carry out an update to the previous review and consider the options that are available to the Council for the future shape of the HWRC contract. With the contract ending in early 2023 the Council sought independent expert advice on the ways forward. CEC is aware that the current model has been superseded by others, whose contracts are not based on the income from commodities as a key element. This is an important change as the volatility of the recycling market has severely impacted the planned income from these materials, and therefore future contracts are likely to incur higher costs. The Council is seeking to understand the best contract model based on the scenarios below.

Key objectives are therefore:

1. Modelling the scenarios identified by Cheshire East Council. The scenarios include:

- Scenario 1 - Keeping 3 key sites open. Crewe, Macclesfield and Knutsford and therefore closing Congleton, Poynton, Bollington, Alsager and Middlewich
- Scenario 2 – Keeping 4 sites open. Crewe, Macclesfield, Knutsford and Alsager
- Scenario 3 - Keeping 5 sites open. Crewe, Macclesfield, Knutsford, Bollington and Alsager
- Scenario 4 – Keeping 6 sites open, closing Poynton and Congleton

The analysis of the scenarios will help the Council understand the impact on the remaining sites in terms of throughput and traffic, the impact on residents in terms of site provision and drive times as well as any legislative or statutory implications.

Additionally, the review will help the Council understand how the services compare with the geographic and demographic neighbours. The review will identify how services could be improved and the potential for increased income.

2. Determining viable contract options from the analysis included in the review. This will assist the Council in assessing the future market and legislative situation and the impact of these on services as well as the contracts and procurement options.

2 Baseline

2.1 Current HWRC provision levels

The Council has a statutory duty to provide sites at which residents can deposit their household waste free of charge and that are reasonably accessible to residents. The legislation does not specify how many sites

an authority should provide and therefore the responsible authority is able to determine what is reasonably accessible based on local circumstances.

The Waste and Resources Action Partnership (WRAP) published an HWRC Guide in 2012, which identified guidance for the level of provision of HWRCs, these were:

- Maximum catchment for a large proportion of the population of 3-5 miles (7 miles in very rural areas)
- Maximum driving times for the great majority of residents in good traffic conditions of twenty minutes (30 minutes in very rural areas)
- Maximum number of inhabitants per HWRC of 120,000
- Maximum number of households per HWRC of 50,000

In Cheshire East, there are currently eight sites at Alsager, Bollington, Congleton, Crewe, Knutsford, Macclesfield, Middlewich and Poynton. This equates to one site for approximately 24,000 households and one site for every 47,600 inhabitants. 76% of residents are within 5 miles of an HWRC and over 98% can reach a site within 20 minutes in normal traffic. Taking account of the guidelines above, CEC currently has a sufficient provision of HWRCs to fulfil its statutory duty.

2.2 Current performance

The following Figure 1 shows the performance of the HWRC network between 2017 and 2020. The impact of the introduction of the rubble charges in January 2018 can be clearly seen in the significant decrease in the quantity of the material presented at the HWRC network. This therefore led to a decrease in the recycling rate (incl. rubble). However further analysis of the data (removing rubble from the calculation as shown by the dark blue line) shows a more general decline in the recycling rates across the network from 65% in 2016/17 to 61% in 2019/20.

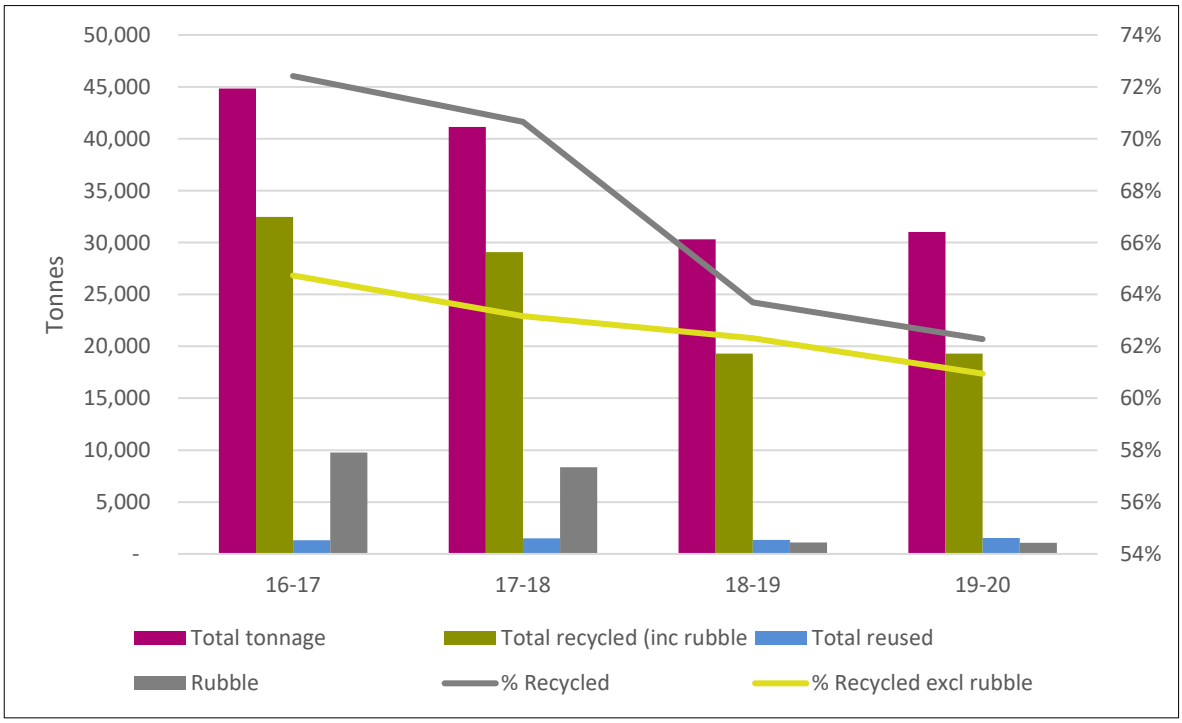

Figure 1 HWRC network performance between 2016/17 and 2019/20

2.3 Users

A user count was carried out in May and June 2020 following the reopening of sites, after the pandemic restrictions had been lifted. The results are shown in Table 1 below. Crewe, Knutsford, Macclesfield and Alsager had the highest footfall.

Table 1 Average users per day per site

Site	Average no of users per day
Alsager	304
Bollington	175
Congleton	186
Crewe	419
Knutsford	325
Macclesfield	303
Middlewich	172
Poynton	206
Total	**2,090**

3 Benchmarking

CEC was benchmarked with both neighbouring and similar authorities with the results provided below. Further detail is referenced in the following section and provided in Appendix A.

3.1 Neighbouring authorities

HWRC sites in six neighbouring local authorities were selected for benchmarking based on their proximity to the border with CEC. The neighbouring authorities are:

- Cheshire West and Chester
- Warrington Borough Council
- Greater Manchester WDA (incl. Manchester, Stockport, Trafford)
- Derbyshire County Council (incl. High Peak Borough Council)
- Staffordshire County Council (incl. Staffordshire Moorlands, Newcastle-under-Lyme Borough Council)
- Shropshire

According to the 2018/19 national HWRC directory CEC has the second highest HWRC recycling rate excluding rubble (66.7%), following Warrington (71.0%). In terms of throughput, CEC has the second lowest annual tonnage, coinciding with a 25% drop from the previous year. Throughput per household is middle of the range (180kg/hh/yr.); with Shropshire and Greater Manchester residents producing the most HWRC waste (276 kg/hh/yr.). Both CEC and Cheshire West and Chester have the highest number of sites per 100,000 population (2.1 sites), when compared with the neighbouring authorities.

A summary of key policies and opening times are detailed in Table 2. All authorities enforce vehicle restrictions, largely related to vehicle payload and length. Shropshire enforces a similar permit scheme to CEC for vans or larger vehicles, while Warrington issues permits either for vans with large amounts of

household waste, or where non-household waste is being disposed of. Both Greater Manchester and Warrington allow only a certain number of visits per year, with the former restricting frequency based on vehicle type. Only Staffordshire requires residents to pay for disposal of rubble, plasterboard and soil type wastes, though most authorities state that only small DIY projects can be accepted. Greater Manchester and some sites in Staffordshire cannot accept plasterboard and asbestos.

HWRC opening times are varied across the authorities. Cheshire West and Chester, Warrington, Greater Manchester, and Derbyshire all provide at least one site with opening times similar to or greater than CEC. The Chester, Ellesmere Port and Winsford recycling centres, within Cheshire West, provide 12-hour opening times during weekdays in the summer months.

Table 2 HWRC policies and opening times of neighbouring authorities

Authority	Vehicle restrictions	Residents Permit	Limits on non-household waste	Opening Times	Trade Waste Accepted?	DIY Charges
Cheshire East	Yes	Yes, for vans or trailers	Small DIY projects only, charges applicable. No gas cylinders or tyres. Asbestos at Pyms Lane Crewe or Danes Moss Macclesfield only.	Seven days a week; 8:30am-5pm April-September, 8:30am-4pm October-March.	Yes, limited quantities of rubble from small traders	Hardcore/rubble/soil/ ceramic/glass & plasterboard = £3.60 per bag, per sheet or individual item.
Cheshire West & Chester	Yes	No except for Neston, due to location near council boundary.	Cannot accept asbestos, gas cylinders, tyres.	3x sites open seven days a week: Summer months 8am-8pm weekdays, 8am-6pm weekends. Winter months 8am-4pm every day. 4x sites open five days a week (midweek closing). Summer months 9am-5pm. Winter months 8am-4pm.	No – separate centre allocated for trade waste next to Chester Site.	No
Warrington Borough Council	Yes	Yes, for non-household waste, or when using van for large amounts of household waste.	Requires permit with list of items, regardless of vehicle. Up to three visits in 12-month period. Can't accept car tyres or vehicle parts, fire extinguishers, gas bottles, hazardous or flammable liquids or chemicals, pallets.	Gatewarth: Seven days a week; 8am-6pm Stockton Heath / Woolston: Seven days a week; 10am-4pm weekdays, 8am-6pm weekends (Stockton Heath: 8am-4pm weekends in winter months).	No	No
Greater Manchester WDA	Yes	No	No asbestos, plasterboard (both to be taken to waste transfer facility) or food waste.	Seven days a week; 8am-6pm	No	No
Derbyshire County Council	Yes	No	No car parts except tyres (max 4), large tree branches, large items of fitted furniture, greenhouses, sheds, fencing, decking, Christmas cards or wrapping paper. Plasterboard – max. 50kg per visit per week, whole sheets not accepted. Asbestos – 2x roofing sheets or 2m downpipe.	Seven days a week; 8:30am-6pm	No	No

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Authority	Vehicle restrictions	Residents Permit	Limits on non-household waste	Opening Times	Trade Waste Accepted?	DIY Charges
Staffordshire County Council	Yes	No	DIY only. Charges applicable to some items. No car parts (except tyres/batteries), animal carcasses, petrol or diesel. No plasterboard at Cheadle or Newcastle. No engine oil at Newcastle. Although usually accepted at Leek, asbestos is not currently permitted. Restricted to 4 sheets or 4 bags per household every six months.	Newcastle-under-Lyme: Five days a week (midweek closing), 9am-5pm. In summer months, 9am-6pm weekdays. Staffordshire Moorlands - Biddulph: Five days a week (Mon/Tue closed), 9am-6pm. In winter months, 9am-4:30pm. Leek: Seven days a week, 9am-5pm (in summer months, 9am-6pm weekdays).Cheadle: Five days a week (midweek closing), 9am-5pm (in summer months, 9am-6pm weekdays).	No	Rubble/bricks/concrete/glass/gravel/ceramic/sand/slate/soil/stone/tarmac/turf/tiles & fibreglass - £3 per bag or large item. Plasterboard - £4 per bag or sheet. Tyres - £4 per tyre.
Shropshire	Yes	Yes, for cars with large trailers, vans and 4x4s with goods body, long-term hire commercial vehicles.	Small DIY only. Asbestos requires notification prior to visit.	Seven days a week; 9am-5pm	No	No

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3.2 Similar authorities

In order to benchmark the current CEC HWRC operation we have identified five target authorities using Office of National Statistics (ONS) area classification data which uses 59 key variables of demographic and socio-economic factors to rank the similarity of local authorities across the UK. The most similar authorities to CEC are identified as:

- Cheshire West & Chester
- Tewkesbury
- Stroud
- Stafford
- Monmouth

For authorities that are waste collection authorities only (Tewskesbury, Stroud and Stafford), HWRC data for the disposal authorities (Gloucestershire and Staffordshire) has been used.

According to the 2018/19 National HWRC Directory, CEC has the highest HWRC recycling rate excluding rubble when compared to the similar authorities. CEC's throughput per household is second lowest amongst the group (180kg/hh/yr.), following Staffordshire (175kg/hh/yr.). Monmouthshire in comparison, had a throughput per household of 492kg/hh/yr., and provides double the amount of sites per 100,000 population (4.2.) when compared to CEC (2.1 sites).

A summary of key policies and opening times are detailed in Table 3. Gloucestershire and Monmouthshire normally use a similar permit scheme to CEC for vans and trailers, though both are currently enforcing a pre-booking system in light of Covid-19 restrictions. Both Gloucestershire and Staffordshire will accept tyres and batteries but not car parts, and also mention that they will not accept petrol or diesel. All authorities accept plasterboard, rubble and soil, as long as it is for DIY only and not trade waste, with only Staffordshire charging for the disposal of these items. Monmouthshire explicitly states that DIY waste is restricted to five bags or one small car boot load per visit, with a maximum of two visits per month.

The majority of sites have shorter opening times compared to CEC, with Gloucestershire, Monmouthshire and some Cheshire West sites opening for five or six days per week.

Table 3 HWRC policies and opening times of similar authorities

Authority	Vehicle restrictions	Residents Permit	Limits on non-household waste	Opening Times	Trade Waste Accepted?	DIY Charges
Cheshire East	Yes	Yes, for vans or trailers	Small DIY projects only, charges applicable. No gas cylinders or tyres. Asbestos at Pyms Lane Crewe or Danes Moss Macclesfield only.	Seven days a week; 8:30am-5pm. April-September, 8:30am-4pm October-March.	Yes, limited quantities of rubble from small traders	Hardcore/rubble/soil/ceramic/glass & plasterboard = £3.60 per bag, per sheet or individual item.
Cheshire West & Chester	Yes	No except for Neston, due to location near council boundary.	Cannot accept asbestos, gas cylinders, tyres.	3x sites open seven days a week: Summer months 8am-8pm weekdays, 8am-6pm weekends. Winter months 8am-4pm every day. 4x sites open five days a week (midweek closing). Summer months 9am-5pm. Winter months 8am-4pm.	No – separate centre allocated for trade waste next to Chester Site.	No
Gloucestershire County Council (Tewkesbury, Stroud)	Yes	Normally for vans. Booking system now in force for all visits due to Covid-19.	Cannot accept ammunition, flares, animal carcasses, car parts (except tyres/batteries), clinical waste, petrol or diesel, invasive or poisonous plant species, large items such as septic or heating tanks. Asbestos must be pre-booked.	Six days a week (mid-week closing). 9am-5pm.	No	No
Staffordshire County Council (Stafford)	Yes	No	DIY only. Charges applicable to some items. No car parts (except tyres/batteries), animal carcasses, petrol or diesel. Although usually accepted, asbestos is not currently permitted due to Covid-19. Restricted to 4 sheets or 4 bags per household every six months.	Seven days a week; 9am-5pm. In summer months, 9am-6pm weekdays.	No	Rubble/bricks/concrete/glass/gravel/ceramic/sand/slate/soil/stone/tarmac/turf/tiles & fibreglass - £3 per bag or large item. Plasterboard - £4 per bag or sheet. Tyres - £4 per tyre.
Monmouthshire County Council	Yes	Normally for vans. Booking system now in force for all visits due to Covid-19.	DIY waste restricted to five bags or small car boot load per visit, with maximum of two visits per month. No asbestos.	Six days a week (midweek closing); 8am-5pm. Covid: Key worker times: 8am-9am.	No	No

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3.3 Benchmarking findings

The findings of the benchmarking with neighbouring and similar authorities suggest that:

- In terms of rubble/construction type wastes, only Staffordshire charges residents for disposal similar to CEC. Monmouthshire and Derbyshire do provide limits on the amount of waste that can be disposed, but most authorities are less explicit, asking only that small DIY wastes be brought to recycling centres.
- Most of the comparable authorities require some form of residential permit for vans, but not all.
- The majority of authorities accept asbestos but impose either limit to the amount that can be disposed or ask that site visits are pre-booked. Safe handling and bagging or wrapping of materials is advised in all cases.
- CEC is amongst the authorities which provide longer opening times. There are however three sites within Cheshire West which are open for 12 hours each weekday during the summer.

4 Scenario spatial analysis showing drive times and distances for residents

Spatial analysis has been completed to understand the distance residents need to travel to the nearest HWRC and the drive times for residents within Cheshire East. A number of scenarios were modelled to consider the impact of closing two or more sites. All calculations assume that residents are likely to visit their closest site in Cheshire East. The analysis does not include HWRCs outside the Cheshire East boundary.

Table 4 Sites included within each scenario (✓ denotes site remains open in the scenario)

Site	Current	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Alsager	✓		✓	✓	✓
Bollington	✓			✓	✓
Congleton	✓				
Crewe	✓	✓	✓	✓	✓
Knutsford	✓	✓	✓	✓	✓
Macclesfield	✓	✓	✓	✓	✓
Middlewich	✓				✓
Poynton	✓				

The scenarios were chosen by CEC to represent different levels of HWRC provision, ranging from just two site closures in scenario 4, to a network of only three sites. Detailed results of the spatial analysis are included in Appendix B with the key points discussed below.

At present, with eight HWRCs, 98% of householders can reach a site within twenty minutes. Analysis indicates that more than 78% of all households could drive to an HWRC in less than fifteen minutes in all of the scenarios modelled, (with the exception of the scenario whereby only the core sites of Crewe, Knutsford and Macclesfield remain open). This suggests that there is a potential over provision of sites

within the authority and closure of up to three sites would not have a significant impact upon the majority of the population. Reducing the number of HWRCs to only three sites would mean that approximately 12% of households would have to drive more than 20 minutes to reach a HWRC. CEC may deem this to be acceptable given the WRAP guidance suggest that the great majority of residents are twenty minutes (30 minutes in very rural areas) away.

Drive time analysis has been used as a proxy for which sites a householder is most likely to use. Of course, convenience and preference will also play a role. However, assuming householders use their nearest sites, 67% of CEC households use Alsager, Crewe, Knutsford or Macclesfield. 7% of households use Poynton HWRC, 8% use Middlewich HWRC and both Bollington and Congleton are used by 9% of households. Previous analysis has shown that the proximity of sites within neighbouring authorities means that approximately 8% of households are closer to a site outside of CEC. The map below shows the locations of the HWRCs and the current overlap of 15-minute drive times.

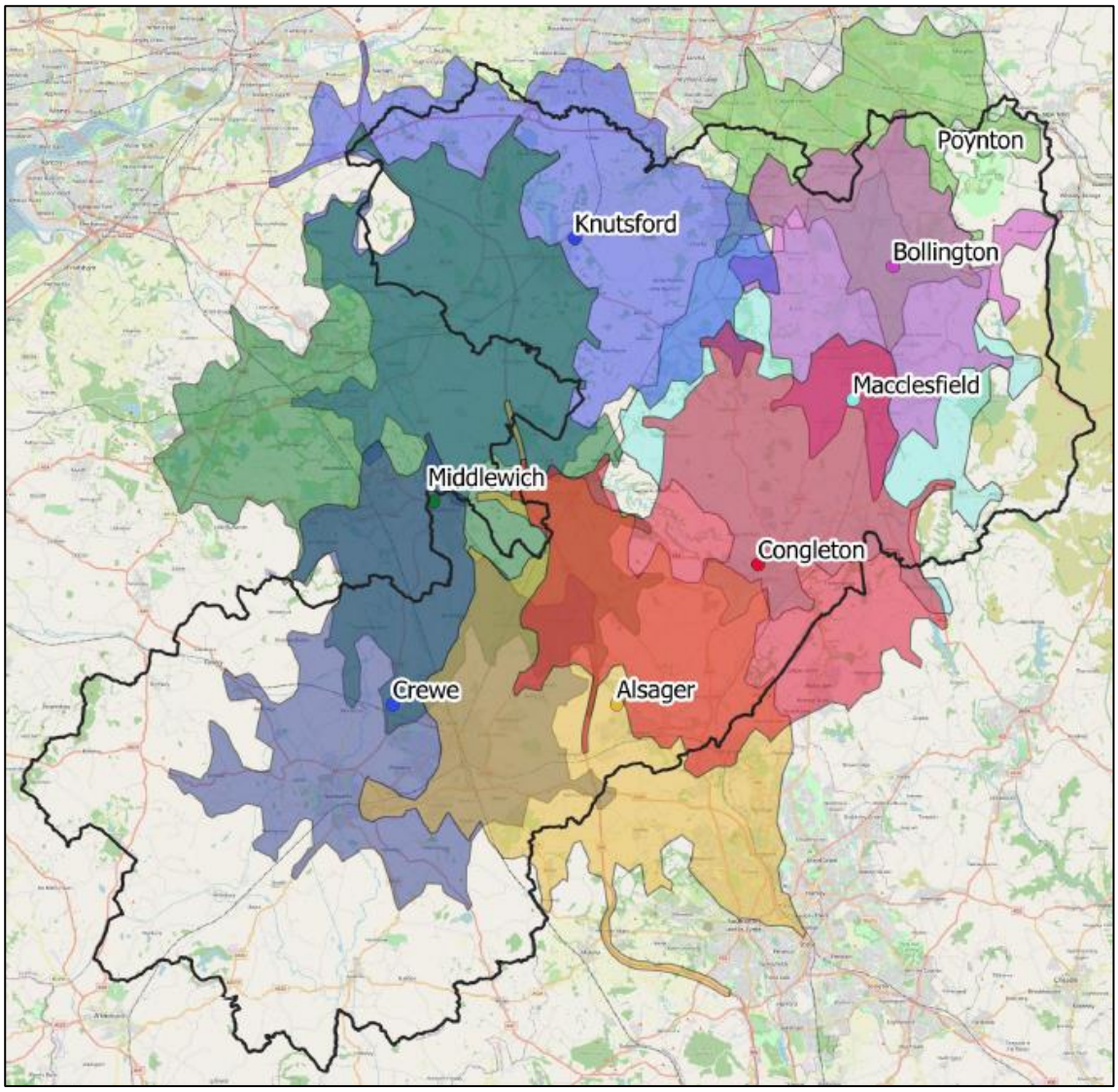


Figure 2 Current HWRC network and 15-minute drive times

4.1 Scenario 1 – Macclesfield, Crewe and Knutsford open

If five of the eight sites were to close, Macclesfield would be the closest site for another 21% of the population. Crewe would be the closest site of another 16% of the population. Therefore, both sites would require redevelopment or renewal to accommodate this additional throughput of site users and tonnage. Indeed, all three sites would also require investment to ensure they could accommodate the additional throughput whilst maintaining high recycling rates.

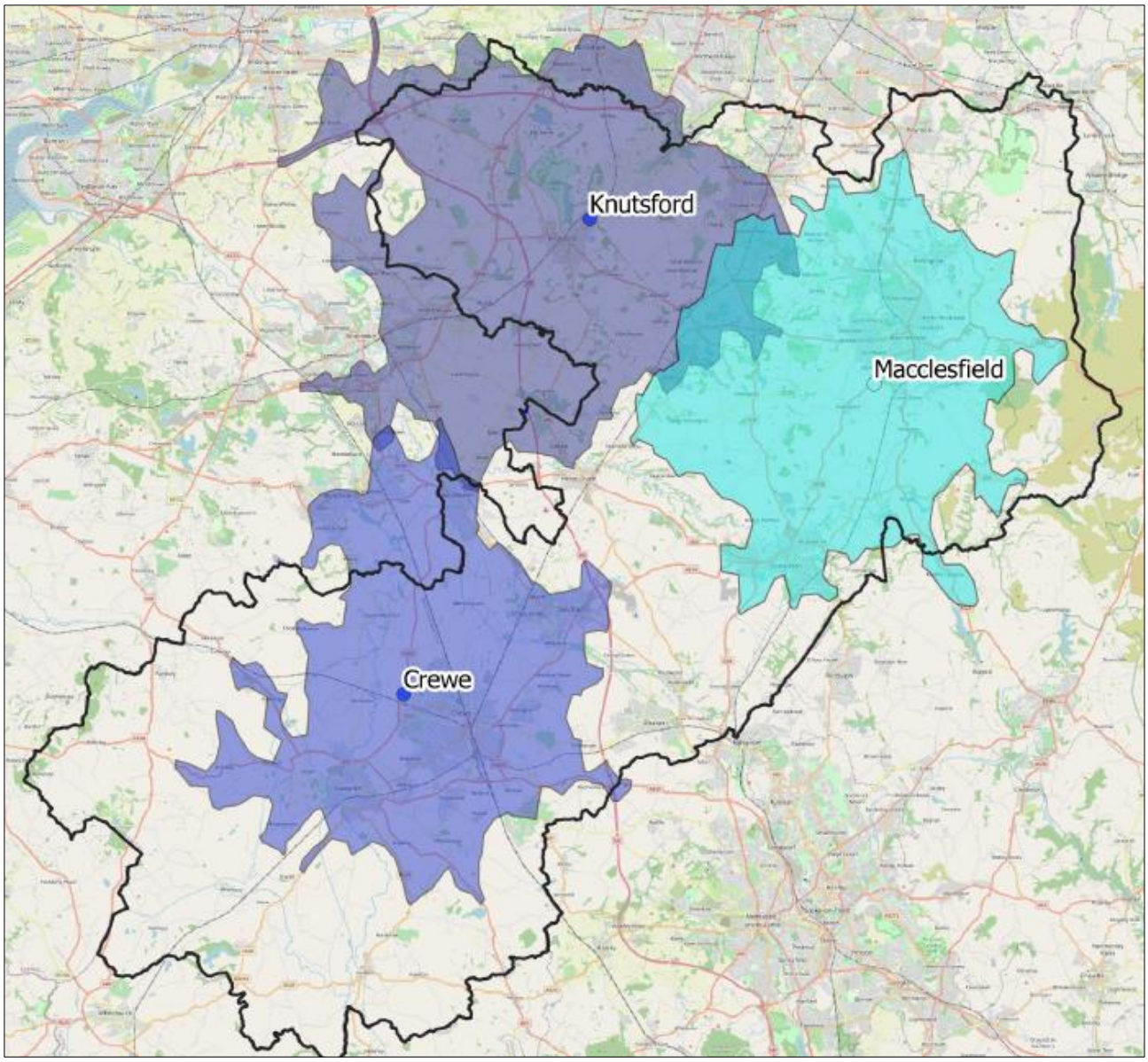


Figure 3 Scenario 1 and 15-minute drive times

4.2 Scenario 2 – Macclesfield, Crewe, Knutsford and Alsager open

A scenario that sees Bollington, Congleton, Middlewich and Poynton close (as the four sites with the smallest throughput) would minimise the overlap of HWRC catchments in the centre of the authority. There would be areas in the north around Colshaw Farm and Poynton and in the South in Wrenbury and Audlem where residents would be expected to drive for more than 15 minutes to reach their nearest HWRC within Cheshire East. However, based on WRAP guidelines, 93% of households would still receive acceptable levels of provision because they could reach a site within twenty minutes. In this scenario there would be a noticeable impact on Macclesfield HWRC with 37,000 more properties in the Macclesfield catchment area, compared with the current provision.

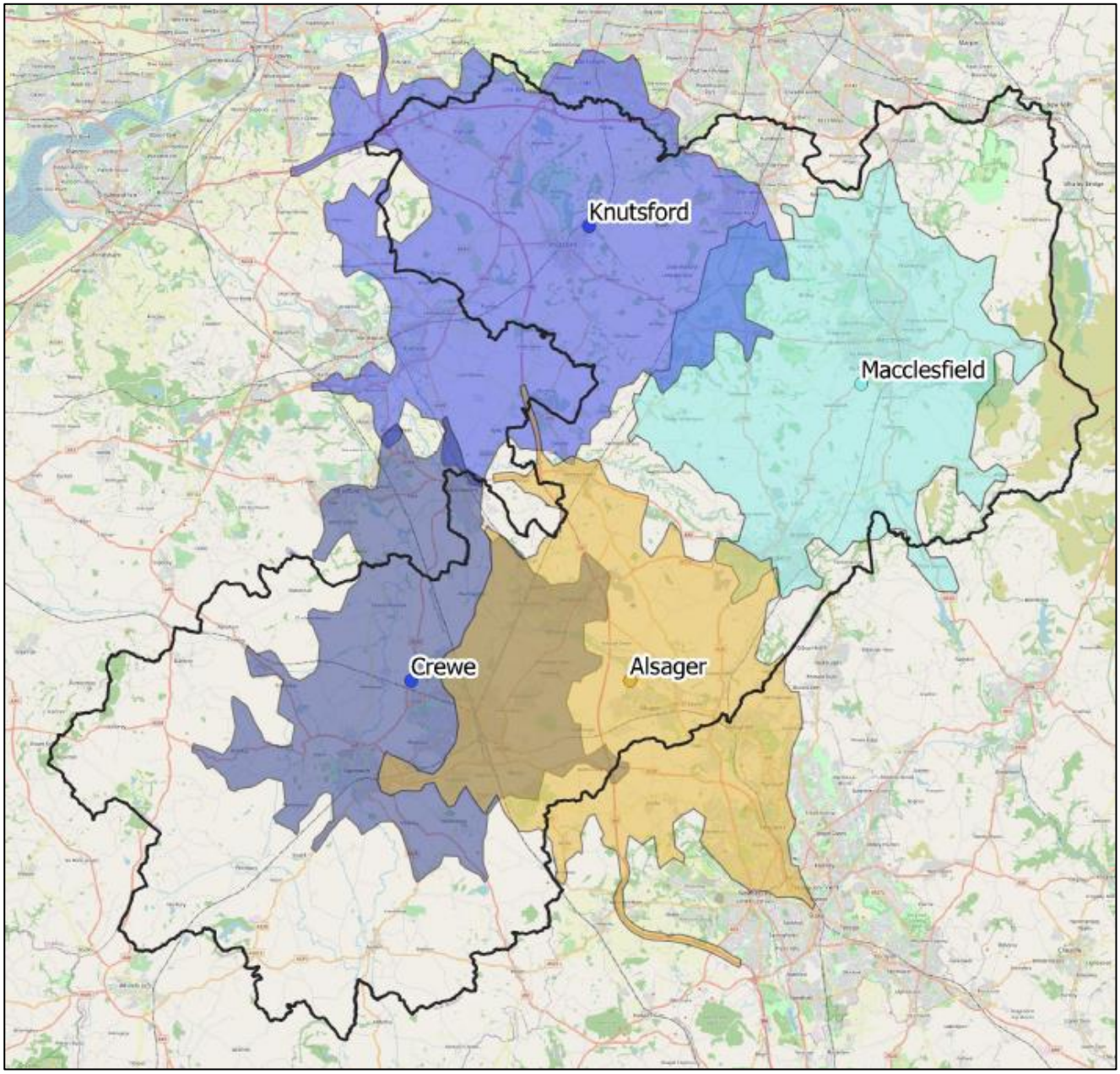


Figure 4 Scenario 2 and 15-minute drive times

4.3 Scenario 3 – Macclesfield, Crewe, Knutsford, Alsager and Bollington open

If Congleton, Middlewich and Poynton close, and assuming they are not replaced, the spatial analysis forecasts that Macclesfield and Bollington will see increased use. 9% more households will go to Macclesfield and 7% more households will go to Bollington. 96% of households will still receive acceptable levels of provision because they could reach a site within twenty minutes.

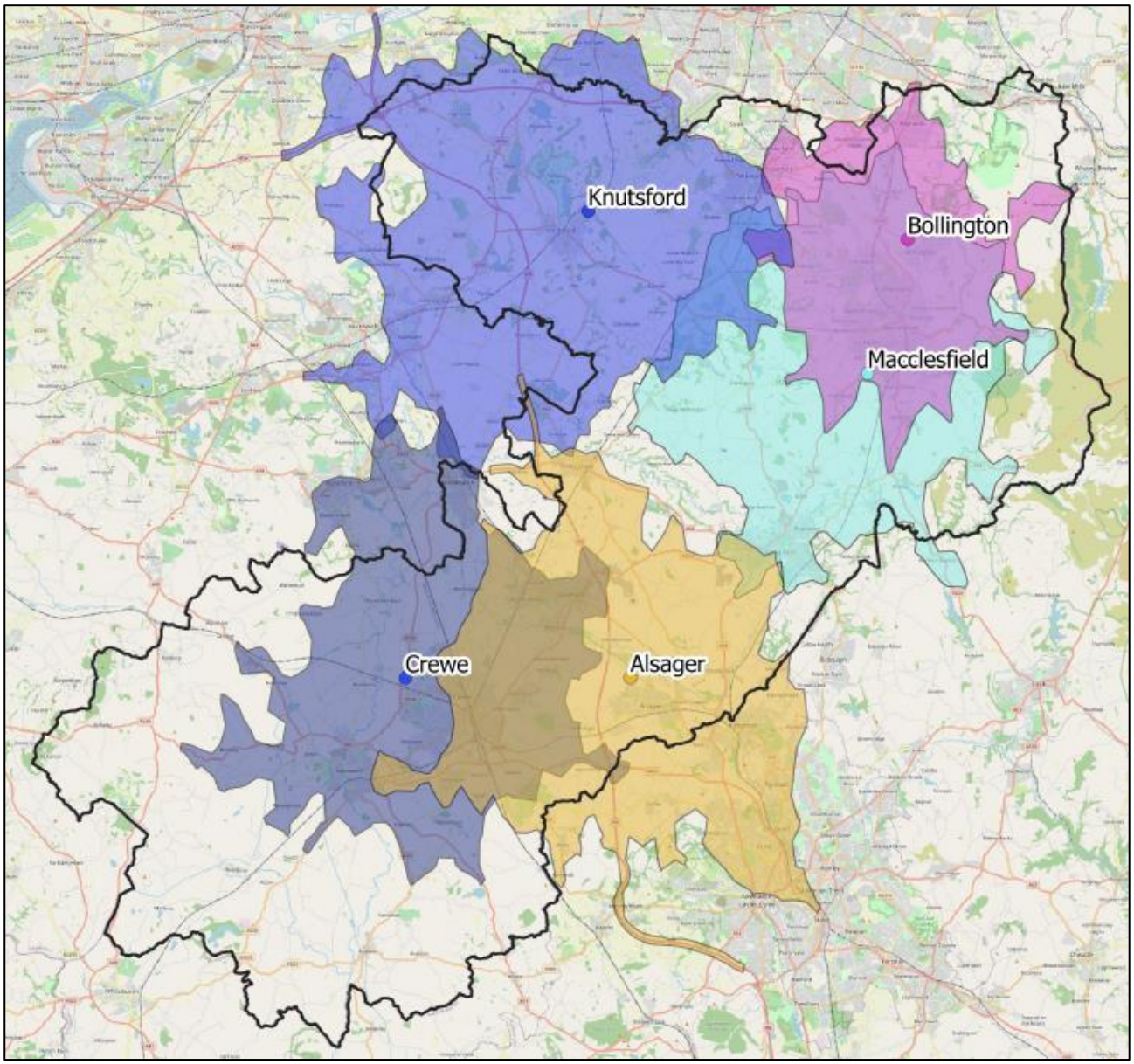


Figure 5 Scenario 3 and 15-minute drive times

4.4 Scenario 4 – Macclesfield, Crewe, Knutsford, Alsager, Bollington and Middlewich open

If Congleton and Poynton close, and assuming they are not replaced, the spatial analysis forecasts that Bollington and Macclesfield will see similarly increased use as in scenario 3. Middlewich will have the same number of households closest to it. As in scenario 3, 96% of households would still receive acceptable levels of provision because they could reach a site within twenty minutes.

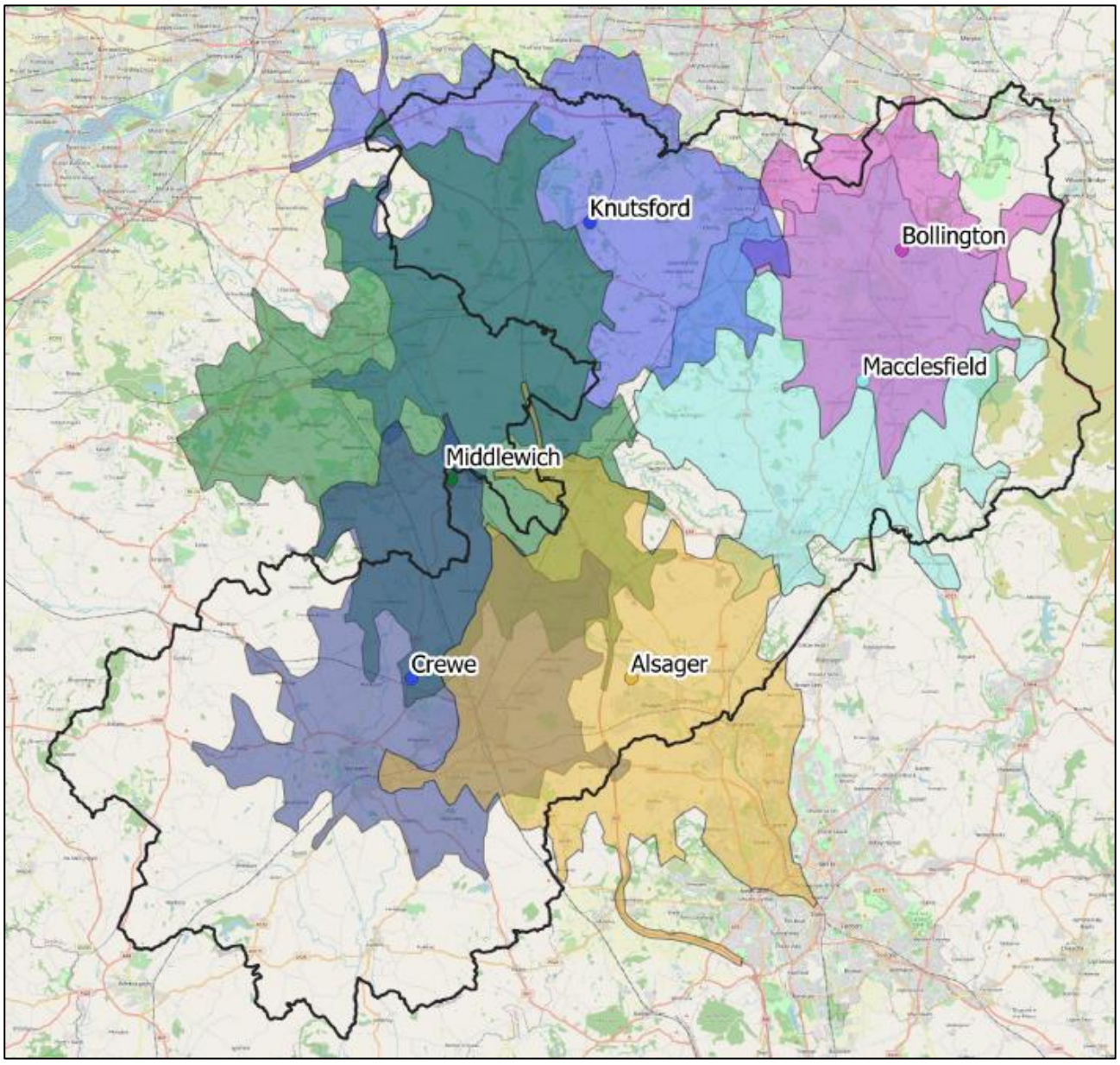


Figure 6 Scenario 4 and 15-minute drive times

5 Network Options

Cheshire East Council, with its responsibility to manage public finances in a sustainable manner, is reviewing the HWRC network to ensure the operation of the service is the best it can be.

CEC designed a range of scenarios to assess the associated impact on the residents. The analysis was based on current costs and tonnages with key assumptions including:

- A small decrease in tonnages of 4% for closure of Congleton and Poynton. This was based on the decrease in tonnages year on year in the three months Arclid was closed before rubble charges were introduced.
- The remaining tonnages are unlikely to decrease with the effect of tonnage reductions stopping after the two small sites are closed.
- An allocation of management fee proportional to current tonnage throughput on sites
- Reduction of management fees by 50% for each site closure with the rest having to be reallocated (in terms of staff, equipment and contractor overheads across the network)

Table 5 below shows the scenarios and the associated savings alongside estimated annual contract cost.

Table 5 Theoretical savings and network cost in the first year (without indexation) for the four scenarios

Scenario	Sites to close	Potential savings in the first year (without indexation)	Estimated annual cost of network in the first year (without indexation)
Scenario 1	Congleton, Poynton, Bollington, Alsager and Middlewich	£406,025	£2,057,958
Scenario 2	Congleton, Poynton, Bollington and Middlewich	£287,634	£2,176,349
Scenario 3	Congleton, Poynton and Middlewich	£213,131	£2,250,852
Scenario 4	Congleton and Poynton	£143,138	£2,320,845

The savings modelled for site closures are very similar to those reported in the 2016 study with the network cost dropping to just over £2million should only three sites remain open. However, as the estimates are based on the terms of the current contract which comes to term in 2023 it is difficult to say how the savings associated with site closures will translate to actual savings for the new contract. The material market conditions and the new contract specifications (including the material prices, the risks and income sharing mechanisms and the employment situation for example the minimum wage) will have a significant effect on the future costs of the HWRC network. It is therefore important to take the figures with caution and treat them as a way to offset any increases in the costs as opposed to a significant cost saving opportunity.

The analysis of the redistribution of the tonnages across the network for the different scenarios used the spatial analysis and assumed that the residents would use the site closest to them in terms of drive times. The results of this analysis should be treated with caution as this is not always the residents' main motivation for using a particular site. This is particularly well demonstrated by the analysis of current tonnages and the closest sites to householders which is considerably different for some of the sites

(including Crewe and Macclesfield which are to remain open in all scenarios). This analysis however is at this current time the best approximation available. It is recommended that the Council considers on site user surveys with a question about the residents' postcode (even just partial) to collect better data on the users and where they travel from in the County. Table 6 below shows the results.

Table 6 Tonnage redistribution based on drive time analysis and current tonnages for the four scenarios

Site	Total throughput 19/20	Total throughput apportioned by closest site by drive time	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Alsager	3,906	3,567		4,576	4,576	3,941
Bollington	2,664	2,942			4,875	4,874
Congleton	2,783	2,913				
Crewe	8,183	9,787	14,696	10,921	10,921	9,722
Knutsford	3,948	3,544	5,745	5,427	4,096	3,572
Macclesfield	4,918	3,886	10,367	9,884	6,341	6,304
Middlewich	2,350	2,354				2,394
Poynton	2,256	2,017				
Total	**31,009**	**31,009**	**30,808**	**30,808**	**30,808**	**30,808**

The increase in tonnages across the three sites in Scenario 1 are significant with all of the sites having to accept around double the material they are currently accepting. This would require significant improvements including a potential redevelopment of the sites and considering how the sites would be accessed by increased numbers of residents as well as the need to service these sites (number of haulage vehicles etc.). We note from the site plans that this would require the extension of the site into the adjoining land (with potential purchase of industrial or farmland required). In Knutsford this may be difficult due to the proximity of residential properties. We also note that this increase in throughput would result in significant increases in vehicle movements both of residents visiting the site and service vehicles. It appears from previous site plans and assessments that there is limited space for queuing and the queues could end up on public highways.

It is difficult to estimate the cost of site redevelopment with a wide range of costs reported across the industry. However, the recently redeveloped Chester site cost in the region of £900,000[1].

Early estimates of site options for a potential new replacement for Congleton (due to the fact that the site is leased, and the landlord has indicated they may shortly require vacant possession), would be around £4m.

Scenario 4 (providing the least number of site closures) shows an estimated increase in throughput ranging from 1% for Alsager to 28% in Macclesfield. In this scenario Bollington is likely to experience an increased

[1] https://www.hwmartin.com/news/chester-residents-and-businesses-get-new-recycling-centres/

throughput (almost doubling) because most of the tonnage from Poynton would be absorbed there. However, we cannot be sure how much of an outlier this may be. It would be important to survey the residents in the nearest site in Poynton to understand the split between Bollington and Macclesfield. In either case, both sites would require some improvement works. Bollington is surrounded by farmland and has an extended access road. Macclesfield is adjacent to the Council waste site so the potential for redevelopment could be carefully considered.

The savings associated with land sale could be used to fund site development and improvement. Table 7 shows the estimated land sale value based on 2017 Government estimated land values[2] of industrial land (which is the most recent available data set). The example costs have been calculated as an average for the two data points in the proximity to Cheshire East (Warrington and Chester) but the high and low estimate based on the highest and lowest estimated land value is also provided for interest and to demonstrate the range.

Scenario 4 would result in only small savings due to Congleton site being leased so the income would only be generated through the closure of Poynton.

Table 7 Estimated revenues from sale of land for the four scenarios

Site	Site size (SqM)	Potential revenue from sale of land	Comments	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Alsager	6,240	£397,800		£397,800			
Bollington	4,701	£299,670		£299,670	£299,670		
Congleton	1,642	£0	Land leased	£0	£0	£0	£0
Middlewich	1,587	£101,171		£101,171	£101,171	£101,171	
Poynton	1,858	£118,422		£118,422	£118,422	£118,422	£118,422
Total estimated potential income				**£917,063**	**£519,263**	**£219,593**	**£118,422**
High				£1,442,421	£880,821	£457,758	£167,184
Low				£601,009	£367,009	£190,733	£69,660

5.1 Impact on recommended site provision levels

Although there are no statutory levels of HWRC provision, WRAP HWRC guidance recommends that the maximum number of inhabitants per HWRC is 120,000 and the maximum number of households per HWRC is 50,000. The following table shows the levels for the scenarios considered alongside the current situation.

The analysis shows that all but Scenario 1 would provide the recommended level of HWRC provision by households and inhabitants.

[2] https://www.gov.uk/government/collections/land-value-estimates

Table 8 Household and inhabitants per site for the four scenarios

Scenario	Households per site	Inhabitants per site
WRAP recommended	50,000	120,000
Current	23,979	47,599
Scenario 1	63,943	126,930
Scenario 2	47,958	95,198
Scenario 3	38,366	76,158
Scenario 4	31,972	63,465

6 Other service efficiency and cost improvement measures

Cheshire East Council has already implemented several best practice initiatives across the HWRC network including bag splitting (currently suspended due to Covid-19 pandemic) or accepting trade waste rubble on sites. The following section summarises additional measures that could be considered.

6.1 Improving the user experience and site aesthetics

It is well established that site performance is influenced by site aesthetics and user experience. This includes signage, site cleanliness and how the traffic is managed.

Following the 2016 HWRC review, the Council planned and costed a wide range of improvements for the sites.

Table 9 shows the breakdown of the measures and costs. Note that no improvements to Congleton site were planned.

Table 9 Planned site improvements and the associated costs

Site improvements	Signage	Traffic	Infrastructure	Welfare	Re-use	Total
Alsager	£17,100	£1,500	£21,600	£25,500	£0	£65,700
Bollington	£11,740	£0	£8,150	£45,000	£0	£64,890
Crewe	£17,100	£14,000	£20,400	£55,500	£0	£107,000
Knutsford	£8,610	£0	£53,850	£66,000	£0	£128,460
Middlewich	£11,365	£0	£28,500	£30,000	£0	£69,865
Macclesfield	£15,240	£1,935	£33,715	£27,000	£25,500	£103,390
Poynton	£9,945	£0	£35,625	£25,500	£0	£71,070

However, the work is currently on hold and there is potentially a saving associated with prioritising the improvements to sites that are earmarked for staying open indefinitely. Table 10 shows the potential savings for the four scenarios considered in this report.

Table 10 Potential savings from site improvements works for the four scenarios

Scenario	Sites to close	Potential savings
Scenario 1	Congleton, Poynton, Bollington, Alsager and Middlewich	£271,525
Scenario 2	Congleton, Poynton, Bollington and Middlewich	£205,825
Scenario 3	Congleton, Poynton and Middlewich	£174,460
Scenario 4	Congleton and Poynton	£71,070

7 Resources and Waste Legislation and Policy Impacts

A range of environmental measures have been proposed in recent years that could have far reaching impacts, such as the Drinks Return Scheme (DRS), consistency framework for household waste collections, and reform of the Extended Producer Responsibility (EPR) requirements. The measures are in different stages of development, consultation and implementation and key aspects are currently being debated for many of these policies. Three landmark policy and strategy documents outline the key policies and are analysed below for their potential impact on HWRCs:

- The Resources and Waste Strategy, 2018[3]
- The Environment Bill, Draft 2018[4]
- EU Ecodesign Implementing Regulations, 2019[5]

The measures in these three documents are discussed in the sections below. Based on this analysis, Table 11 lists key policies and indicates the nature of their impact on HWRCs. The table illustrates the large number of policies recently announced that have the potential to significantly impact operations at HWRCs.

The predominant impacts are expected to be on the quantity of the waste received and the nature of the waste, e.g. by diverting specific waste streams or products to other waste management systems or altering the products placed on market in terms of their design, materials, durability and repairability. The waste treatment options available are also likely to change. For example, EPR reform could incentivise recycling of difficult to recycle products such as carpets and mattresses. At a national level, economies of scale could be gained enabling new facilities to be opened to process these waste streams. EPR and DRS are anticipated to present funding opportunities if producers engage with Councils and HWRC services and pay for treatment of their waste products, and Councils could be reimbursed for handling deposit-bearing items not captured by the DRS return points and arriving as waste at the HWRC.

Interestingly, many of the policies could require more sophisticated data monitoring and reporting. Such data systems would allow Councils to interface with emerging waste systems such as EPR and DRS and

[3] *HM Government (2018), Our waste, our resources: a strategy for England, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf*

[4] *Environment Bill, Bill 003 2019-20 (as introduced), https://publications.parliament.uk/pa/bills/cbill/2019-2020/0003/20003.pdf*

[5] *Regulation laying down ecodesign requirements 1 October 2019, https://ec.europa.eu/energy/en/regulation-laying-down-ecodesign-requirements-1-october-2019*

access the associated funding mechanisms. Several of the policies also imply the need for improved performance in waste management, and HWRCs are likely to have a pivotal role in delivering this.

Table 11: Summary of key policies and their impacts on HWRCs

	Quantity of waste	Nature of waste	Waste treatment options	Funding	Data and reporting	Performance requirements
Extended Producer Responsibility	✓	✓	✓	✓	✓	✓
Drinks Return Scheme	✓	✓		✓	✓	
Ecodesign	✓	✓	?			
Right to repair	✓	✓	✓			
Addressing barriers to re-use at HWRCs					✓	✓
Tackling waste crime			✓			
Single-use plastics bans	✓	✓				
Single-use plastics charge	✓	✓		?		
Waste collection consistency	✓	✓				
Net-zero carbon emissions by 2050	✓	✓	✓		✓	✓
Mandatory electronic tracking of waste					✓	

✓ = Yes, ? = Impact is less certain

7.1 Potential future changes

The policy landscape is fast developing, and it is worth considering further measures that may be brought in to support those discussed above. We highlight two specific policy topics below.

The UK recycling rate has flat-lined in recent years. The 2020 municipal recycling rate target is likely to be missed, and subsequent targets will prove even more challenging. It is conceivable that individual targets will be set for local authorities and perhaps even targets for HWRCs. The emphasis and planned systems for waste data collection and reporting would support targets for re-use, recycling and waste reduction, and the new Office for Environmental Protection would be set to monitor progress and intervene where deemed necessary. Meeting higher targets will be bound with the funding impact of EPR and objectives around the collection and processing of food waste. Government has consistently said it will support local authorities with costs attached to these higher objectives and ensure that industry pays the full cost of EPR for packaging and that this accrues to councils in line with the desire for efficient, high-quality packaging collections. While the impact of EPR for packaging may not be the biggest factor in the evolution of HWRCs

it is still a factor to account for and may well lead to funding support for well collected packaging. The EPR for other items and especially for bulky items ending up in HWRC, such as furniture and mattresses, has not yet been discussed but will be an important consideration and an issue many organisations from the public sector and producers will need to be aware of.

To meet the environmental objectives, including carbon impacts, it is likely that further measures will be taken to influence the full product life cycle including design, production, supply, use and disposal. The initial focus could look to improve primary, secondary and tertiary packaging and transport of goods.

Beyond this, there may be potential impacts from other areas of policy development, outside the resources and waste arena that need to be considered in the development of new HWRCs and modernisation of existing sites. For example, growing demand for active travel and safe cycling is forecast. As infrastructure improves and demand increases, the opportunity to incorporate safe access to HWRCs by bicycles (including cargo bikes) may provide an innovative and timely accessibility improvement to the service that would prove popular and chime with Climate Emergency actions. Government has recently announced new funds[6] for safe cycling infrastructure and access to these funds should be monitored and prove especially relevant for new site developments.

Further analysis of the implications of the new legislation and national strategy can be found in Appendix C.

8 Innovation within the HWRC sector

Local Authorities across the UK are looking at ways to run the services more efficiently while improving the recycling, reuse and diversion rates. The innovative ideas recently employed within the HWRC sector can be grouped into the following categories:

- Site operations
- Site design
- Contracts

8.1 Site operations

8.1.1 ANPR and CCTV

ANPR and CCTV have recently been used and requested in contracts by LA. The technology can be used for administering the permit systems, managing trade abuse and in some places, limiting the number of visits on a “fair usage” case (for example in Herefordshire County Council there is 12 fair usage visits per annum). The systems could also be used to monitor traffic flows, collecting data on numbers of visitors and using this to potentially communicate live updates to residents. This has been successfully employed by Bristol Waste Company where live CCTV footage of the HWRC queues can be accessed via their website[7].

[6] https://www.sustrans.org.uk/our-blog/news/2020/february/government-pledges-5bn-to-improve-bus-and-cycling-services-our-response/

[7] https://www.bristolwastecompany.co.uk/hrrc-queue-camera/

8.1.2 Further material separation

Further steps can be made to separate materials for recycling where multi-material furniture (e.g. sofas, beds, mattresses) are unsuitable for re-use. A site in Wales has set up a system where the items are stripped down by hand on site and then separated into various components. Initially only the wood and metal were recycled, but negotiations are ongoing with reprocessors to recycle additional materials such as flock and foam. Existing site staff are utilised to undertake the work which is carried out on a rotational basis depending on how busy the site is. Material stripping activities are attributed to an estimated 2-3% increase in the recycling rate. Cost benefits include increased revenue from the sale of recyclate and savings in landfill tax and gate fees. Additionally, staff motivation and happiness increase as targets are met and staff efficiency is maximised by utilising 'down time' to strip materials. An additional staff member is employed using revenue generated by the process.

8.1.3 Community recycling centres

With cuts to resources some local authorities have considered site closures and network rationalisation. One creative way to limit the site closures while at the same time realising savings is changing the function of the waste and recycling centres to recycling and reuse. In Lancashire one of the smaller sites was renamed as a Community Reuse and Recycling Centre and accepts a limited range of materials excluding residual waste, wood, rubble, chemicals and asbestos while retaining the reuse shop onsite.[8] The Centre, which operates in a different way from the other sites, has a focus on selling recycled items, alongside a limited waste and recycling service.

There are also several innovative operations internationally where the recycling sites' focus has shifted further up the waste hierarchy. An example of this recently has been the Reuse centre in Ljubljana[9] which operates as a reuse or resource hub where items are repaired and upcycled.

8.2 Site design

Whilst requiring a considerable amount of engineering work, a move from a more traditional site design to the introduction of modular and flexible solutions has been a key innovative design solution. A modular design allows the site to be reconfigured as needed with the minimum of difficulty and expense. One construction firm comments[10]:

> *We offer a prefab concrete modular system for the construction of split-level household waste recycling centres that helps achieving higher recycling rates enhances safety and customer satisfaction and is future proof because of its flexibility. The modular construction can easily be expanded or adapted and could even be relocated. Construction time is very short; only 1-2 weeks, depending on the size of the platform.*

Figure 7 below shows the modular HWRC design used in Cardiff. The infrastructure is constructed from prefabricated blocks. Visitors drive up the ramp, park next to the waste bays and deposit materials into skips on the lower level. The site can be expanded by placing additional prefab blocks, or even moved

[8] *https://www.lancashire.gov.uk/waste-and-recycling/recycling-centres/garstang/*

[9] *https://www.vokasnaga.si/en/reuse-centre*

[10] *https://governmentbusiness.co.uk/company-focus/modulo-beton-modular-hwrc%E2%80%99s-%E2%80%93-construction-conscience*

and/or combined with other sites. The space under the platform can be used for storage; a re-use shop, offices, a tool library, repair shop etc. and the red bins on the top level are linked via chutes to the space below allowing for safe disposal of small waste streams such as batteries.

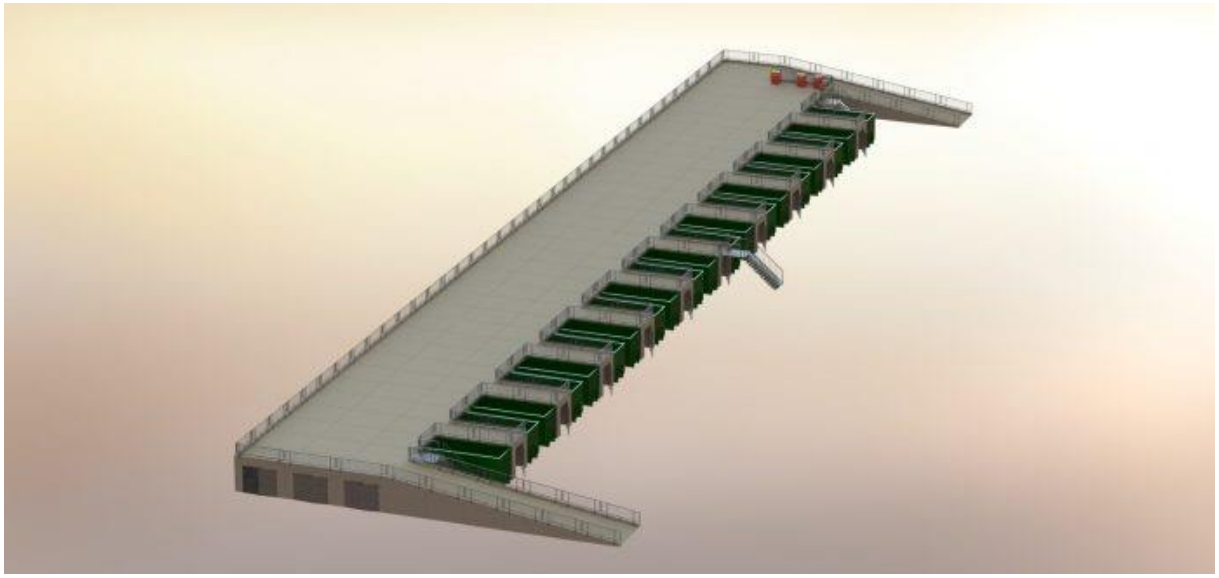


Figure 7: Plan of modular design in Cardiff HWRC[11]

8.3 Contracts

There are several methods that contracts for operating HWRC sites and networks can be set up to drive efficiency and performance. This includes contract length and size, risk and income sharing, contract incentives and penalties.

Similarly, there are a number of options that the LA can consider in terms of the contract characteristics but the factors behind these decisions are likely to include:

- whether other waste and recycling services are included within the same contract;
- the number of sites within the network and whether they are to be managed as one contract or several;
- investment requirements;
- the local authority's attitude to risk;
- the strategy for contracting with local businesses and third-sector organisations;
- the level of flexibility required.

8.3.1 Contract length and size

The overall contract cost and the structure will often be dependent on the length of the contract. Traditionally the length of the contract would align with the life span of equipment or assets so between 5 and 11 years. This is still common practice in the industry. However, some LAs are entering into much longer-term contracts for example where significant investment is required. For example, Somerset Waste

[11] https://www.modulo-beton-environment.com/realization/uk-united-kingdom/

Partnership is currently under contract with Viridor which had the initial term of 16 years, recently (2019) extended by 9 years to 2031.

There are a number of options where the contract for operating the HWRC networks have been included within a wider service provision making it a more integral part of the overall waste management solutions within the LA are and generating some potential savings through the economies of scale. This however has to be carefully considered to ensure that all elements of a contract are delivered to the required quality. Drafting of the specification would require significant time and expertise and a transparent way of evaluating the financial viability of the contract would be required during the procurement process. The potential bidders for such a contract would include the large, national and multinational waste management companies.

On the other hand splitting the contract into smaller lots (by location or function such as haulage, site operation, material brokering etc.) may be beneficial if specialist services are required and the LA has a clear procurement strategy that encourages participation of smaller businesses or local third sector organisations. In such instances it would be important to consider the contract interfaces (for example vehicles operated by one contractor needing access to sites that are operated by another contractor) and how the contracts will be coordinated day to day.

8.3.2 Income and risk sharing

The material markets have been significantly affected by international events in recent times, with the likes of China imposing very tight controls on the materials that can enter their economy from abroad and the price of oil falling. Additionally, national policy decisions have a direct impact on how material is traded. For example, the Environment Agency is investigating waste wood to determine whether the material is hazardous or not. The methods will have an impact on the overall wood recyclers market and ultimately price for disposing of the material. Furthermore, there is continuing uncertainty associated with the Resources and Waste Strategy with its risks and opportunities for market development.

It is therefore important for the LA to consider how much risk it is willing to take on the price of the materials as any risk the contractor will need to take will be costed in to the proposed contract during the tender stage.

There are a number of mechanisms that the LA can choose to include during the procurement process these would be up for discussion during the competitive dialogue sessions. These could include: a percentage split of income or cost, additional limits on the maximum costs of income the contractor can claim, open book contracting[12] or set review periods. Such mechanisms should be considered in detail with qualified legal and accounting advisors and should take into account the additional costs and required expertise associated with managing more complex contracting arrangements.[13]

[12] *Open Book Contract Management (OBCM) is a structured process for the sharing and management of charges & costs and operational and performance data between the supplier and the client. The aim is to promote collaborative behaviour between client and supplier through financial transparency. The outcomes should be a fair price for the supplier, value for money for the client and performance improvement for both over the contract life.*

[13] *https://www.nao.org.uk/naoblog/open-book-contracting/*

8.3.3 Incentives and penalties

There are specific incentives and penalties associated with recycling, diversion and reuse or waste prevention targets. These can generally be described as:

- Specific bonuses or financial penalties for meeting or not meeting specified target or stretch targets or banding
- Incentives or penalties associated with the saving or incurring costs for disposal of the material. It is important to note that if the contractor is responsible for disposal costs any savings are likely to be retained by the contractor
- Specific mechanisms for managing performance and the delivery against Key Performance Indicators (for example the delivery of regular reports and the consequences of non-delivery)

The LA will need to consider the key metrics for the contracts whether that would be focused on the recycling targets, diversion from residual waste or customer service and design the mechanisms to ensure these are met. The design of such mechanisms would require expertise from legal and financial advisors and the complexity of managing such mechanisms would need to be considered for the life of the contract. Specific examples of incentives and penalties focussed on recycling and diversion used by LAs can be found in Appendix D.

9 Assessment of procurement options

CEC's HWRC network is currently operated by HW Martin under a contract which finishes its term in 2023. The contract is managed on behalf of the Council by ANSA Environmental Services, a company wholly owned and controlled by the Council (a Teckal company[14]). Additionally, the sites are managed by individual site managers subcontracted to HW Martin. The Council is currently considering the options available to it for how a new contract could be operated. The contract would need to provide improved performance control and flexibility because of the impact, in the medium term, of the Government's Resources and Waste Strategy. The following table explores the issues and questions the Council will need to consider in greater detail ahead of any procurement exercise. This qualitative analysis provides an assessment of the potential impact on the costs of the service and operations of the HWRC network and highlights where each of the service delivery and contracting models has particular benefits or drawbacks. The assessment is based on our broad experience of working with the local authorities and waste operators.

[14] *https://www.cipfa.org/policy-and-guidance/articles/teckal-the-basics-explained*

Table 12 Legend for Table 13

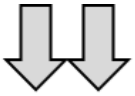
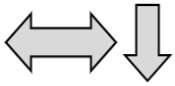
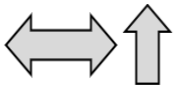
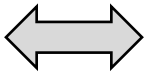
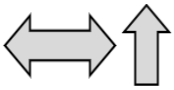
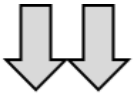
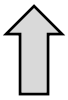
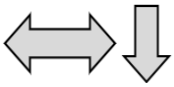
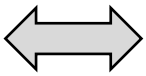
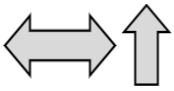
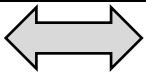
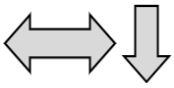
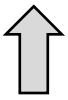
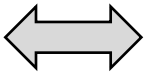
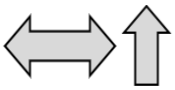
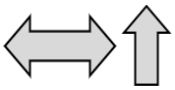
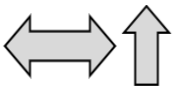
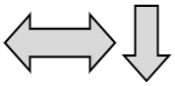
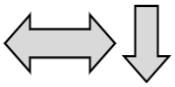
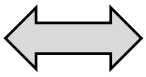
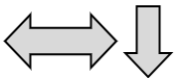
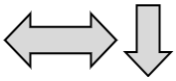
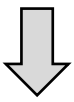
Change	Impact level
Negative impact/ cost increase	
Greater negative impact/ cost increase	
Status quo	
No immediate negative impact/ costs but potential over time	
No immediate positive impact but potential over time	
Positive impact/ reduced costs	
Greater positive impact/ reduced costs	

Table 13 HWRC operating models and the potential benefits and disbenefits

Risk/ Opportunity	Current contract HW Martin and subcontracted site managers	In house operated by ANSA, the Teckal company	Outsourced to a single private contractor	Commentary/ evidence
Emerging policy – local				The current service has limited flexibility to respond to local issues, with ANSA potentially being able to build this into a co-ordinated approach that prioritises local needs. In order to respond to local issues an In house service will need to ensure that it is tuned in to issues locally and can respond accordingly. There may be a danger that out-sourced contracts are less likely to be able to change and adapt.
Emerging policy – national				Reduced ability to respond to the opportunities and impacts posed by EPR/ DRS without an integrated approach and in the bounds of the current contract. A Council owned company would be able to respond to policy requirements as required by the Council. Contract drafting of out-sourced delivery is key to maintaining the ability to respond over time.
Fleet management (vehicles, grapple vehicles etc.)				Benefits of buying in-house potentially balanced by private sector access to wider purchasing agreements – if CEC owns the HWRC service vehicles this is less of an issue.
Vehicle maintenance				Some positive impact likely from integration with the other waste services operated by ANSA. As long as the contracts clearly specify responsibilities the right contractor may benefit from some buying power.

Risk/ Opportunity	Current contract HW Martin and subcontracted site managers	In house operated by ANSA, the Teckal company	Outsourced to a single private contractor	Commentary/ evidence
Infrastructure				The current contractor has access to a well-located waste transfer station which serves CEC and the nearest neighbours. It is unlikely the LA would be able to procure a WTS meaning there may be a need to invest or use the services from the contractor who was not awarded the contract. Any other contractor would have to consider this issue in the response, and it would depend on the local presence and infrastructure they already have in the area. This would be expected to add costs to the contract.
Flexibility and resilience in service delivery				Individual site managers driven only by managing their site with limited involvement in the wider issues and services. Flexibility enhanced by integration. However, the current contractor managed all streams and is able to respond to the demands because of that. In house and outsourced similar on balance – internal flexibility due to greater control balanced against support available from other private-sector contracts / national agreements.
Service consistency				The ability for the in-house company to respond to the priorities of the Council ensuing that these are applied consistently. As long as the specification is well drawn out a private contractor is likely to apply the same approach across the contract. Greater control over staff as opposed to sole agents site managers

Risk/ Opportunity	Current contract HW Martin and subcontracted site managers	In house operated by ANSA, the Teckal company	Outsourced to a single private contractor	Commentary/ evidence
Rationalisation of the HWRC network				Previous rationalisation of the network aligned with the renegotiation of terms which meant the savings were not realised as estimated. A contract that is operating less sites and less waste should theoretically result in savings. However, should radical changes (such as Scenario 1 and 2 in section above) be made capital investment will be required. This would be expected to include significant redevelopment of sites or building of new sites. The less radical scenarios 3 and 4 would require less investment. All site closures may generate income from land sale.
Staffing costs and management costs				The current contract has issues with staffing partially funded by the material sales. Due to market collapse this has been difficult. Potential greater saving with outsourced due to regional/ national management and support functions and potentially reduced pension liability.
Materials value				Private sector service providers are likely to have greater experience in material marketing & greater access to markets. ANSA could already have the skills and staff capable of managing the material to extract the best value.

Risk/ Opportunity	Current contract HW Martin and subcontracted site managers	In house operated by ANSA, the Teckal company	Outsourced to a single private contractor	Commentary/ evidence
Procurement costs				Extension of the current contract could save CEC some costs and resources which would be required to go out to open tender. The LA could choose to appoint their wholly owned company to take the contract on with limited procurement costs required. However legal advice would be required and the company is still subject to EU Procurement Regulation.
Buying power				Both in house (due to integration with other CEC waste services) and outsourced could have greater buying power - subject to potential market saturation.
Responding to growth				Limited flexibility in the current contract. An in-house service would enable a cohesive internal response to growth. With an out-sourced service model the contract drafting would be critical.
Commercial waste/ non-HH waste				Potential incentive for ANSA to generate more income for the company and support other services. Potentially competitive pricing as the company is Council owned and not profit driven. Out-sourced – contract drafting is important in order to provide incentivisation to grow service.

Risk/ Opportunity	Current contract HW Martin and subcontracted site managers	In house operated by ANSA, the Teckal company	Outsourced to a single private contractor	Commentary/ evidence
Reputation	⟺	⇑⇑	⇑	In-house service has greater ability to enhance reputation through communicating savings and responding to local needs. With out-sourcing careful contract drafting would be required to maintain service standards and good control of communications/ public interface would be required. Protecting CEC's reputation through ensuring any service transfer is as good as possible is very important.

The key consideration throughout this assessment was the balancing of cost savings and the Councils appetite for risk and significantly improving the service alongside retaining the flexibility to accommodate any changes resulting from the 2018 Strategy. One of the first important steps is to start a conversation with ANSA about this contract, as the option to take the service in house would mean significant growth which may or not be within the strategic plan for the company.

Should the outsourced model be preferable, the drafting of the specification and careful negotiation would require concerted effort from Council officers.

9.1 Attractiveness of the contract

The market conditions are an important consideration when tendering any services. Although it is difficult to assess how the waste management market will respond to any contract there are some key elements which may help with understanding the market situation.

It is important to note that the response of the market is dynamic. The response of the market will depend on who is operating other contracts in the region, and when they are up for retendering, the waste management companies and their strategic priorities, waste management companies bidding capacity and how the market perceives the current contract (for example if it is well known that the incumbent has competitive advantages or is a preferred bidder for the services). It is unlikely that the number of sites is a factor in how attractive the contract is to the market. The key considerations now will be connected to the material markets and how this will impact the affordability of the contract. As the prices of the materials are currently lower and are fluctuating the contractor will have to price in the risk associated with trading materials in uncertain conditions. As HWRC contracts tend to be procured through the competitive dialogue process the risk and income sharing mechanisms, as well as any incentives or penalties, will be the key issues discussed. Should the Council wish to close sites, redevelop sites or build new sites during the term of the contract this would have to be clearly stated in the invitation to tender documents and discussed at length during dialogue.

The following table shows the contractors and expected contract terms of the benchmarked authorities which sheds some light on the state of the HWRC contract market.

Table 14 Benchmarked LA and the contract arrangement

Local Authority	Contractor	End of term
Cheshire West and Chester	HW Martin	2023
Staffordshire	Amey	2022
Derbyshire	Renewi	2021
Greater Manchester	Suez	2026
Warrington	EWC	Unknown (last known extension request to Jan 2020
Shropshire	Veolia	2034
Gloucestershire	Ubico	2026
Monmouthshire	Dragon Waste, contracted through Viridor	under renegotiation as permanent closure of Usk was intended for 31 March

The geographic and demographic neighbours' services are operated by a number of different waste management companies with the major players represented in this sample. It is particularly interesting that CECs closest neighbour, Cheshire West and Chester will be considering its options at the same time. It may be prudent to initiate conversations about partnership working which may result in savings to the operating costs of the contract for both authorities.

It is recommended that the council carries out a soft market testing exercise well in advance of any procurement document being prepared (at least two years in advance of the contract award). This will allow the market to express their views on the attractions of the contract in the comfort of private meetings with Council officers.

10 Concluding remarks

The review presented within this document analyses the current HWRC network provision as well as the potential impacts of the four scenarios for network rationalisation identified by Cheshire East Council.

The analysis shows that any site closures are anticipated to provide some savings in revenue costs associated with the operation of the sites. It will be important to ensure that these are reflected once the contract is retendered. However, the savings are not guaranteed as the contract price will ultimately depend on the conditions on the materials markets and the risks the Council will be willing to take for this contract. As the situation is currently very uncertain (with the prices of the material low and additional uncertainties associated with the changes in the legislation, the UK leaving the EU and Covid-19) the contractors are likely to price these risks in their costs to ensure affordability. It is also clear that in all of the scenarios some improvements will have to be considered to accommodate the redistributed tonnages from the sites. The north east sites, Macclesfield and Bollington, are the ones most likely to be affected by this change.

Table 15 Summary details

Scenario	Proportion of households less than 20 minutes from a site	Potential savings	Investment required	Estimated capital receipt from sale of land
Scenario 1	88%	£406,025	Substantial	£917,063
Scenario 2	93%	£287,634	Substantial	£519,263
Scenario 3	96%	£213,131	Moderate	£219,593
Scenario 4	96%	£143,138	Moderate	£118,422

The analysis identified potential savings through sale of land and the rationalisation of the planned improvement works but for the scenarios with fewer sites remaining, where considerable increases in tonnages are anticipated, there may be a need for the Council to make substantial capital investment in terms of increasing site footprints (purchase of land) and redevelopments. Such major works would need to be carefully planned to manage the impact on site users.

The impact on the residents is considered through the drive time analysis. Currently the residents are enjoying a network which minimises the driving times for them. The rationalisation will have some impact on the drive times to the nearest HWRC however these are not substantial, even for the most radical Scenario 1, with 88% of residents driving less than 20 minutes to the nearest site.

As the Council is considering the opportunities and risks associated with a new contract it will be crucial to build in flexibility to manage the impacts of the changing legislative and government strategy landscape. Drafting contract specification that ensures that the contractor can respond to the changes will be important. Another key consideration will be the situation on the material markets and managing the risks of the commodity price fluctuations. At the time of writing the values of the materials are low, and any contractor would be looking to buffer themselves from the fluctuations, passing these costs onto the Council. However, this may change once the government policies are implemented to develop national material markets and advance the circular economy.

We note from our analysis that limited data on site users is available and we would recommend an on-site user survey to understand the footfall and where the users travel from to access sites. A question to assess the sites the residents would prefer to use, following site closures, could be added to collect further insight. This would enable refinement of the tonnage redistribution analysis as well as the assessment of impact on residents.

Our review includes an assessment of the contract terms and current HWRC operators in neighbouring authorities which will help the Council understand the current market situation. We recommend that the Council carries out soft market testing well in advance of any specification drafting to help inform the decisions.

Appendix A Benchmarking details

A.1 Neighbouring authorities

Warrington Borough Council has three HWRCs in close proximity to Cheshire East; Stockton Heath, Gatewarth and Woolston. Greater Manchester also has three HWRCs close to Cheshire East; Altrincham, Longley Lane and Adswood Road. Staffordshire has two; Biddulph and Newcastle. Cheshire West, Shropshire and Derbyshire all have one HWRC in close proximity to Cheshire East; these are Northwich, Whitchurch and Waterswallows.

Vans and Permits

Most authorities specify a gross vehicle weight limit of 3.5 tonnes and height restriction of 2 metres. Greater Manchester limits the amount of visits allowed to site per year by the type of vehicle; 52 visits for cars and cars with single axle trailers, 18 visits for cars with a double axle trailer or vans under 3.5 tonnes, and any larger vehicles to 12 visits per year. Staffordshire also requires all trailers to be single axle but adds that specifically adapted vehicles for blue badge holders will be accommodated for. Shropshire requires a permit for vans, 4x4s with a goods body or for cars with trailers, while a residents' permit is required for Neston recycling centre in Cheshire West due to its location near the county border.

Warrington's permit system is unlike the others, in that permits are required if residents need to visit more than once in a van to dispose of a larger amount of household waste, or for non-household waste regardless of vehicle. Non-household waste must be listed on the permit prior to visiting, and visits are limited to three per year.

Restrictions on rubble/construction waste

In most cases, authorities do not restrict the number of items or amount of non-household waste but advice that small DIY only will be accepted. All authorities state that they cannot accept trade waste, with Cheshire West and Greater Manchester providing directions to nearby waste transfer stations for these items. Staffordshire is the only other authority to charge per item. This includes a £3 charge per bag or large item of rubble, bricks, soil, concrete, stone, fibreglass and ceramics, and £4 per bag or sheet of plasterboard. Warrington does not issue charges for non-household waste, but items must be listed on a permit prior to the visit. Derbyshire includes a restriction of 50kg plasterboard per visit per week (no whole sheets), 50kg of rubble, concrete or soil.

Asbestos is accepted at Warrington, Derbyshire, the Leek site at Staffordshire, and with prior notice at Shropshire sites. Plasterboard is not accepted at Greater Manchester, or at Cheadle or Newcastle sites in Staffordshire. Derbyshire permits a maximum of either 2x roofing sheets or 2m downpipe of asbestos, while Staffordshire permits either 4 sheets or 4 bags per household every six months.

Opening hours

All authorities provide at least one site which is open seven days a week, and it is only Cheshire West and Staffordshire where the majority of sites are open five days per week. Greater Manchester, Derbyshire, and Shropshire do not state any seasonal variation, with Derbyshire providing the longest opening hours of 8:30am-6pm. The largest seasonal variation can be seen at the Chester, Ellesmere Port and Winsford recycling centres, within Cheshire West, which are open 8am-8pm on weekdays and 8am-6pm on weekends in the summer months, compared to opening hours of 8am-4pm throughout the week in winter.

Materials accepted

Cheshire West and Warrington do not accept gas cylinders or tyres, similarly to CEC; however the other neighbouring authorities seem to do so. Staffordshire accept tyres but implement a charge of £4 each, to a maximum of four. Derbyshire does not accept large items of furniture, nor does it accept any waste resulting from the demolition or replacement of gardens sheds, greenhouses, fencing, or decking, and recommend hiring a skip for garden renovations. Greater Manchester also states that food waste cannot be accepted.

Coronavirus restrictions

Each authority includes detailed information on their website regarding specific site rules due to Coronavirus. In the main, this includes adhering to social distancing measures, avoiding the site for all but essential journeys and having a maximum of one passenger per car. All authority websites state that staff members cannot help to unload vehicles and reminds visitors to behave respectfully and appropriately on site. Derbyshire and Greater Manchester introduced a number plate system to restrict traffic flow on site; however, Greater Manchester has since relaxed this measure. Some materials that are normally accepted have been temporarily suspended, such as asbestos at Staffordshire and Shropshire sites, and clothing, textiles and shoes in Greater Manchester.

Warrington has temporarily closed its Stockton Heath site, while vans are only permitted at its Gatewarth site with 48 hours' notice. A valid form of I.D. is also required at each site.

Table 16 Neighbouring authorities HWRC data from the 2018/19 National HWRC Directory[15]

Authority	Authority type	No. HWRCs 2018/19	No. HWRCs per 100,000 population	Land area per HWRC, sq. miles	Average site catchment radius, miles	Total HWRC tonnage throughput		HWRC arisings, kg/hh/yr.			HWRC Recycling Rate including rubble		HWRC Recycling Rate excluding rubble	
						2018/19	Difference with previous year	All HWRC throughput	HWRC residual	HWRC recycling, excluding rubble	2018/19	Difference with previous year	2018/19	Difference with previous year
Cheshire East	UA	8	2.1	56	4.2	30,073	*-10,895*	180	58	116	67.9%	*-6.4%*	66.7%	*-1.0%*
Cheshire West and Chester	UA	7	2.1	51	4.0	39,001	*-23*	268	83	125	68.8%	*-0.1%*	60.0%	*-0.5%*
Warrington Borough Council	UA	3	1.4	23	2.7	15,202	*-1,153*	166	45	110	73.0%	*1.8%*	71.0%	*2.3%*
Greater Manchester WDA (MBC)	WDA	20	0.8	21	2.6	291,653	*29,917*	276	131	96	52.6%	*8.2%*	42.3%	*2.2%*
Derbyshire County Council	WDA	9	1.1	109	5.9	68,309	*1,933*	196	80	103	59.2%	*-6.2%*	56.3%	*-6.3%*
Staffordshire County Council	WDA	14	1.6	72	4.8	65,109	*2,810*	175	89	78	49.1%	*3.8%*	46.7%	*4.0%*
Shropshire	UA	5	1.6	247	8.9	37,950	*3,002*	276	94	127	66.1%	*1.4%*	57.5%	*1.4%*

[15] *WRAPs national HWRC directory compiled by Resource Futures and updated in 2020 as part of their series of HWRC guidance documents. Figures used in this data set were returned from Waste Data Flow.*

A.2 Similar authorities

Five local authorities were selected for benchmarking based upon their similarity to CEC in terms of certain demographic data. To measure similarity between authorities, ONS uses the squared Euclidean distance (SED), which is based on 59 variables used in the area classification of local authorities. Variables include statistics based on demographic structure, household composition, housing, socio-economic factors and employment. The five authorities chosen were Cheshire West and Chester, Tewkesbury, Stroud, Stafford and Monmouth.

Vans and Permits

Similar to CEC, both Gloucestershire and Monmouthshire require permits for vans. Staffordshire specify small single axle trailers of no more than 6ft x 4ft in size, while Cheshire West and Chester require trailers of fewer than 3.5 metres in length. Monmouthshire do not permit double-axle trailers, and ask that residents only bring what they can unload within a 15 minute period. Gloucestershire specify that vans or pick-ups pulling a trailer may only present waste in either the van or trailer, but not both. All authorities, except for Monmouthshire, impose a 3.5 tonne gross vehicle weight limit.

Restrictions on rubble/construction waste

Rubble and construction waste is accepted at all sites, provided it is not trade waste, but Staffordshire is the only other authority to charge per item. This includes a £3 charge per bag or large item of rubble, bricks, soil, concrete, stone, fibreglass and ceramics, and £4 per bag or sheet of plasterboard. Only Monmouthshire provides an explicit limit on the amount of non-household waste that will be accepted; either five bags or one small car boot load per visit, and no more than two visits per month.

As with CEC, Cheshire West and Monmouthshire do not accept asbestos. Staffordshire restricts the amount to four sheets or bags per household every six months, while Gloucestershire asks that residents pre-book any asbestos disposal.

Opening hours

Opening hours are varied amongst the authorities, but CEC is among those which offer the longest opening periods. Cheshire West has three sites open for seven days a week and four sites open five days a week. Of the sites that are open for seven days, opening hours extend to 8am-8pm during summer weekdays. In winter, all sites are open 8am-4pm. The Stafford site in Staffordshire is open seven days a week between 9am-5pm, with an extra hour added during summer weekdays. Gloucestershire and Monmouthshire sites are open six days per week, with midweek closing, and are open from 9am-5pm and 8am-5pm respectively.

Materials accepted

Gloucestershire and Staffordshire will accept a maximum of four tyres, with the latter charging £4 per tyre. Both authorities include a more comprehensive list of what cannot be brought to site on their websites, including animal carcasses, petrol and diesel. Gloucestershire also specifies that invasive or poisonous plant species are not brought to site. Only Cheshire West and Chester will not accept gas cylinders, similar to CEC. Monmouthshire mention that black bags will not be accepted with food waste or recyclables inside, as these items are covered in the kerbside collection service.

Coronavirus restrictions

Each authority includes detailed information on their website regarding specific site rules due to Coronavirus. These include keeping to social distancing measures, avoiding the site if you or a household

member has symptoms, and practicing good hygiene measures such as washing hands or wearing gloves. Monmouthshire sites at Mitchel Troy and Usk remain closed, while its remaining two sites have an online booking system in place, limiting visits to one per week. Trailers will only be accepted within the 4pm-4:30pm booking slot due space restrictions, while the first hour of each day is reserved for key workers. Gloucestershire also has a pre-book system in place on their website, but limits residents to one visit per day. Staff are unable to help unload cars, except for blue badge holders in Gloucestershire, and there are limits to the number of people in cars, one or driver plus one. Staffordshire and Monmouthshire ask that only one person leave the vehicle to unload, and therefore remind residents that only items that can be carried by a sole person should be brought to site.

Table 17 Similar authorities HWRC data from the 2018/19 National HWRC Directory[16]

Authority	Authority type	No. HWRCs 2018/19	No. HWRCs per 100,000 population	Land area per HWRC, sq. miles	Average site catchment radius, miles	Total HWRC tonnage throughput		HWRC arisings, kg/hh/yr.			HWRC Recycling Rate including rubble		HWRC Recycling Rate excluding rubble	
						2018/19	Difference with previous year	All HWRC throughput	HWRC residual	HWRC recycling, excluding rubble	2018/19	Difference with previous year	2018/19	Difference with previous year
Cheshire East	UA	8	2.1	56	4.2	30,073	*-10,895*	180	58	116	67.9%	*-6.4%*	66.7%	*-1.0%*
Cheshire West and Chester	UA	7	2.1	51	4.0	39,001	*-23*	268	83	125	68.8%	*-0.1%*	60.0%	*-0.5%*
Gloucestershire County Council (Tewkesbury, Stroud)	WDA	5	1.0	201	8.0	56,233	*-5,616*	256	112	131	56.3%	*-11.4%*	54.0%	*-9.2%*
Staffordshire County Council (Stafford)	WDA	14	1.6	72	4.8	65,109	*2,810*	175	89	78	49.1%	*3.8%*	46.7%	*4.0%*
Monmouthshire County Council	UA Wales	4	4.2	82	5.1	19,534	*171*	492	184	240	62.6%	*0.5%*	56.5%	*0.9%*

[16] *WRAPs national HWRC directory compiled by Resource Futures and updated in 2020 as part of their series of HWRC guidance documents. Figures used in this data set were returned from Waste Data Flow.*

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Appendix B Spatial analysis

The current provision offers the best coverage in terms of the shortest drive times for residents, as indicated in Table 18, however both scenario 3 and 4 offer 96% of all properties less than a 20-minute drive to their nearest HWRC. In scenario 3 and 4, only 4% of households are required to drive for more than 20 minutes to reach their nearest site and in scenario 4, the majority (86%) are able to reach their nearest HWRC within 15 minutes by car.

Table 18 Proportion of households in each of the drive time bands for each scenario

	Proportion of Households				
Scenario	**Less than 5 minutes**	**Less than 10 minutes**	**Less than 15 minutes**	**Less than 20 minutes**	**More than 20 minutes**
Current	22%	63%	91%	98%	2%
Scenario 1	11%	37%	68%	88%	12%
Scenario 2	13%	43%	78%	93%	7%
Scenario 3	15%	48%	82%	96%	4%
Scenario 4	17%	52%	86%	96%	4%

The figure below presents the modelled data in terms of cumulative coverage, whereby the proportion of the population served is plotted with each minute driving time from their closest site. The scenario with the left-most cumulative percentage offers the best provision to households and the right-most the least preferable, in terms of drive time. However, it should be noted that the analysis does not account for road works or areas of peak-time congestion.

As can be seen from the graph, the current scenario offers the best provision, followed by scenario 4 and scenario 3. Scenario 1 offers the least provision

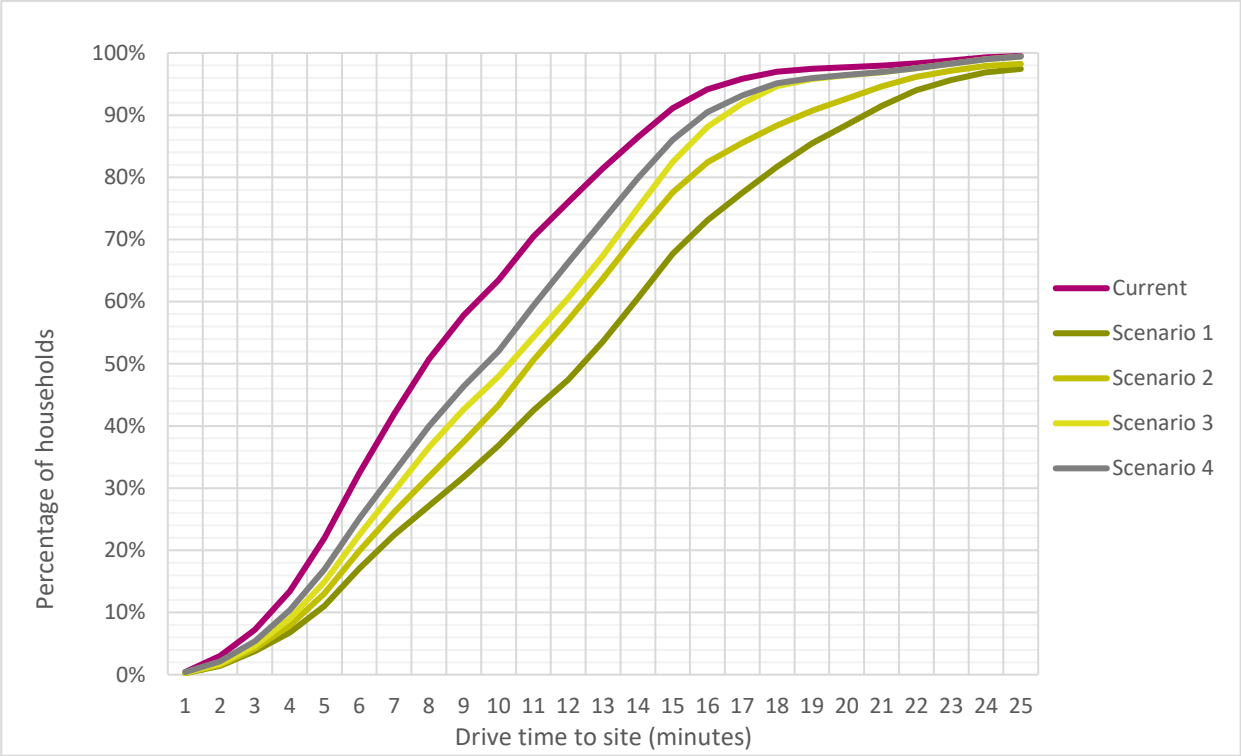


Figure 8 Cumulative drive time for HWRC scenarios

The following table shows the analysis of the distance between residents and their nearest HWRC site. It can be seen that the distance for the majority of residents is less than 8km (equivalent to 5 miles) for three of the four scenarios.

Table 19 Distance from the nearest HWRC

	Proportion of Households				
Scenario	Less than 2 km Zone 1	2 to 4 km Zone 2	4 to 6 km Zone 3	6 to 8 km Zone 4	More than 8 km Zone 5
Current	15%	32%	15%	14%	24%
Scenario 1	7%	18%	13%	8%	54%
Scenario 2	7%	21%	15%	12%	45%
Scenario 3	9%	23%	15%	11%	42%
Scenario 4	11%	25%	15%	13%	36%

Appendix C Detailed legislation assessment

C.1 The Resources and Waste Strategy

The Resources and Waste Strategy (RWS) sets out a broad range of measures that will affect HWRCs and the waste sector in general. The overarching expectation is for a shift to full alignment with the waste hierarchy through prevention and re-use.

The means to deliver this evolution described in the RWS include revised and expanded EPR and minimum requirements through Ecodesign and are expected to fundamentally alter the amount of waste generated, the nature of that waste, and how waste management systems are operated and funded.

Five priority areas are outlined for EPR, three of which will have direct impacts upon HWRCs:

- **Textiles** – Including at least all clothing, as well as other household and commercial textiles such as bed linens;
- **Bulky waste** – Including mattresses, furniture and carpets; and
- **Vehicle tyres** – Including tyres from cars, motorcycles, commercial and goods vehicles, and heavy machinery.

The EU Circular Economy Package sets minimum requirements for EPR schemes specifying, amongst other things, that producers must bear at least 80% of the costs of separate waste collection, transport and treatment necessary to meet EU targets[17]. Furthermore, EPR fees will be modulated to incentivise improvements to product durability, repairability, re-usability and recyclability and the presence of hazardous substances, thereby encouraging a life-cycle approach to production. The RWS goes further with regards to packaging, ensuring that producers pay the full net cost of managing the waste at end of life, i.e. 100% of the cost, and that full net cost recovery will underpin the Government framework for EPR as applied to other products. With regards to EPR, the RWS states that the Government will ensure that local authorities are resourced to meet new net costs arising from the policies in the RWS, including upfront transition costs and ongoing operational costs.

While EPR in the forms being debated for consultation and eventual implementation have derived from the EU Circular Economy Package, there may be questions about the likelihood of the UK Government maintaining regulatory alignment with the EU on packaging legislation now that the UK has left the European Union. At this moment, it is envisaged that packaging legislation may well stay aligned (or very closely aligned) as pan-European and global packaging producers operating across the EU will seek this assurance, and UK Ministers have repeatedly indicated their desire to even deliver stronger policy than that of the EU. This will need monitoring throughout the passage of the Environment Bill and in the subsequent detailed consultation on EPR options, expected in the autumn.

EPR reform is likely to:

- Change the amount of waste entering HWRCs vs. other waste systems;
- Create new waste management systems, e.g. takeback schemes, re-use networks, remanufacturing and repair centres, and specialist recycling centres;
- Change the design of products to enable longer product lifetimes, re-use, repair, modularity, and recyclability;
- Change the nature of waste entering HWRCs as product design changes and some end of life products are diverted to new waste management systems;
- Change how waste management is funded as producers will be liable to pay for waste management, presenting a revenue opportunity for Councils managing EPR product waste; and
- Require detailed data management for reporting and cost-recovery purposes on the part of actors managing EPR product waste.

The waste streams relevant to HWRCs that are most likely to be affected first are:

- Textiles
- Bulky waste
- Vehicle tyres
- Packaging

[17] *Different rules apply to EPR schemes for ELV, Batteries and WEEE. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0851&from=EN*

- WEEE
- Batteries and accumulators

These changes are expected to be implemented by 2023.

Carbon-based targets and natural capital accounting are proposed, moving away from weight-based targets, and inevitably driving different waste management choices. This will undoubtedly be used to support the Government commitment to reach net zero emissions by 2050, outlined in the Environment Bill below.

The RWS dedicates Chapter 2 to "Helping consumers take more considered action", addressing consumption and disposal behaviour with aims to:

- Incentivise consumers to purchase sustainably
- Provide consumers with better information on the sustainability of their purchases
- Ban plastic products where there is a clear case for it and alternatives exist
- Address barriers to re-use
- Support the market for remanufactured goods
- Encourage appropriate disposal of used products
- Lead by example though procurement and the Greening Government Commitments

Specific actions include:

- Addressing barriers to re-use at Household Waste Recycling Centres and consulting on further measures to boost re-use, including reporting and re-use targets;
- Investigating amending the recycling credit system used by two-tier authorities;
- Reviewing the Controlled Waste Regulations and Household Waste Recycling Centres to ensure they are delivering value for money;
- Extending product lifetimes through warranties and disclosure;
- Supporting the market for remanufactured goods, including by developing quality assurance schemes to boost consumer confidence;
- Supporting large-scale re-use and repair through national planning policy;
- Introducing a DRS for single-use drinks containers, subject to consultation;
- Banning the most problematic plastic products, such as plastic drink straws, where there is a clear case for it and alternatives exist; and
- Producing consumer guidance for the recycling, resale, re-use and disposal of consumer internet-connected devices.

These actions reflect the emphasis on re-use, repair and waste prevention that runs throughout the RWS. The DRS may also provide a potential funding stream for deposit-bearing items collected at HWRCs. Furthermore, Chapter 4 of the RWS sets out measures to tackle waste crime, which will be supported by sophisticated digital waste tracking systems as mandated in the Environment Bill described below. Recent media exposés of illegal waste sites abroad treating UK exports of municipal waste have caused public outcry. Stricter monitoring of exports and waste supply chains is likely to improve environmental outcomes, potentially closing some treatment routes or increasing costs as a result of avoiding malpractice.

Ecodesign legislation is also discussed, with ambition to exceed the EU's Ecodesign standards where economically practicable, expanding the scope to cover more resource intensive product groups such as textiles and furniture. The availability of spare parts to facilitate repair, and the presence of harmful chemicals and their impact on recycling are highlighted as key issues.

C.2 The Environment Bill

The Environment Bill[18] currently in Parliament, but temporarily delayed as a result of the COVID-19 emergency, will be subject to scrutiny and amendment at Committee Stage[19] and Third Reading, noting that the Committee Stage was suspended but is now scheduled to report by 29th of September. No further information on scheduling the bill is available at the time of writing but it is important to remember that this flagship legislation will need to be approved by the end of 2020 when the UK leaves the European Union.

It is the legislation that will enact many of the measures outlined in the RWS above. In addition, it sets out:

- A commitment to net zero greenhouse gas emissions by 2050;
- Charges to minimise the use and impacts of single use plastics;
- Mandatory electronic tracking of waste; and
- A new public body, the Office for Environmental Protection, to be an independent watchdog to hold government and other public bodies to account on fulfilling their obligations on the environment.

Waste will be a key policy area in environmental legislation going forwards, particularly in relation to carbon targets due to the considerable amount of emissions associated with waste management and the opportunity to cut emissions through waste prevention, re-use and recycling. The Environment Bill also addresses air quality, which may influence decisions around waste treatment methods, waste transport distances and even HWRC site design and traffic, particularly when sited in urban areas.

C.3 EU Ecodesign implementing Regulations

EU regulations, published on the 1st of October 2019, set out Ecodesign requirements for the following product groups[20]:

- Household refrigerators
- Light sources
- Electronic displays
- Dishwashers
- Washing machines and washer-driers
- Motors
- External power supplies
- Refrigerators with a direct sales function
- Power transformers
- Welding equipment

A key component of the Ecodesign requirements centres on the 'right to repair'. Specific requirements are set out under resource efficiency detailing spare parts and repair and maintenance information that must be made available to professional repairers and end-users. The regulations intend to support prolonged

[18] https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy-statement

[19] *Environment Bill 2020 Second Reading, Hansard 26 February 2020* https://hansard.parliament.uk/commons/2020-02-26/debates/684530F9-0440-45F3-8768-E0E208082739/EnvironmentBill

[20] *Regulation laying down ecodesign requirements 1 October 2019,* https://ec.europa.eu/energy/en/regulation-laying-down-ecodesign-requirements-1-october-2019

product lifetimes, repair and re-use, thereby reducing consumption and waste. If the market responds accordingly, it may also present opportunities for sale of spare parts from products brought to HWRCs.

The new regulations also include requirements for repairability and recyclability, contributing to circular economy objectives by improving the life span, maintenance, re-use, upgrade, recyclability and waste handling of appliances[21].

C.4 Impact of Covid-19

Local authorities and their waste contractors have responded to the pandemic in creative ways, with very few negative news stories about waste management. The industry's profile has been enhanced and the fact that it is designated "key" has been such an important recognition.

Waste Disposal Authorities and their contractors have managed to respond to varying demands; they have been flexible in the face of staffing shortages, assisting collection authorities through staff re-deployment from Household Waste Recycling Centres (HWRCs); incorporated the changing health and safety guidance into safe systems of work and responded to the change in public expectation of service provision; opening as many services as possible as quickly as possible.

Priorities and planning

The length of time from most HWRCs being closed to most being re-opened has been around a month. Discussions with local authority waste managers have shown that some authorities managed to re-open some HWRC sites *in less than a week from the decision being made*. Those that have managed to re-open in such a short time had been working on plans with their contractors for two or three weeks beforehand and had kept a watching brief on developments at all times.

There are a multitude of aspects to be considered before re-opening, not least the management of demand; so, whilst not discounting the importance of off-take, markets for recyclables and disposal the measures and systems that local authorities have put in place to manage demand effectively whilst also adhering to social distancing guidelines. Examples have included:

1. Prioritising the opening of larger sites, where social distancing can be maintained.
2. Implementing booking systems, with access being through Council websites, call centres and phone apps.
3. Managed queueing systems, with increased communication between site staff and site users.

Booking systems

Authorities have implemented booking systems that can be accessed on-line only or by 'phone and other systems as well. Many authorities have focussed on only allowing domestic vehicles to be booked in, at least initially, to cope with the domestic demand and because they take less time to empty than larger vans and trailers. The booking slots have varied in length, from 15 minutes to an hour. Some allow a longer "window" so that, if the site user is delayed for any reason, they will still have chance to use the site; others are more time-specific. Authorities allow differing number of vehicles on site during those slots depending on the size of the site and the number of site staff. This booking slot can easily be changed to allow increases or decreases in numbers depending on staff availability and even fluctuations in the local severity of the pandemic. Using booking systems, means greater restrictions and control can be applied should

[21] https://ec.europa.eu/commission/presscorner/detail/en/IP_19_5895

there be upsurges in Covid-19 which could affect site users, those operating the site and associated off-takers and sub-contractors.

The implementation of booking systems has improved the flow of site users within the sites and helped them to use the sites more effectively; this has also prevented site-staff being inundated at peak periods and has enabled much greater communication between the site staff and site users. The add-on benefits have been increased sorting of materials for recycling and re-use and some reported decrease in residual waste. The booking system can also help to reduce abuse of the site from unauthorised use, such as commercial vehicles, and there is less likelihood of abuse towards site staff if users have to register to use the site.

Most authorities spoken to are intending to keep their booking system going forwards, with adaptations made to numbers on site as lockdown lifts, with additional expansion of the booking categories to allow more vans and trailers, giving those vehicles with larger loads to deposit, a longer time slot or having fewer vans and trailers within each time slot.

It has been reported by HWRC staff, both site staff and council officers, that site users have also been positive about the introduction of booking systems, as queueing is reduced and more assistance is available; they seem to be in favour of the system continuing post-Covid.

Limiting the types of materials accepted

Some authorities, at least initially, limited the types of materials they were accepting; firstly allowing excess black bag waste and then expanding the range/size of materials as throughput decreased following the initial rush - some authorities not allowing larger items, such as furniture and white goods or DIY waste, until recently.

The initial control of the type of waste accepted, often in combination with booking systems and other site access systems, has helped authorities to manage off-take and has allowed the off-takers themselves time to restart their own processes. It has been apparent that a difficult area to re-start has been that of re-use, with site re-use facilities and shops and charity off-takers being hard-hit by the pandemic. This has included schemes like Community RePaint, the paint drop-off and collect re-use system. However, recently, re-use has gradually re-started at HWRCs[22].

Furloughing has affected all parts of the waste management system and infrastructure, yet careful, staged re-opening has helped local authorities source destinations for all the waste and material streams.

Limiting the types of materials accepted on site may be another control measure that could be quickly adapted should there be any resurgence of the pandemic; priority materials could still be accepted, always taking into account the impact on the waste and recycling chain downstream, such has been the case, with the knock-on effects on supply of wood-waste to biomass and off-take of WEEE.

Controlled queueing

Some authorities were unable to implement booking systems for various reasons. This included those where reciprocal agreements between neighbouring authorities were in place - for allowing each other's residents on site - but where they had different systems, or different demands and where other authorities' sites weren't re-opening. Cross-border site use had to be considered. Others found it difficult to set up a

[22] https://www.letsrecycle.com/news/latest-news/councils-tentative-steps-open-reuse-shops/

booking system in the time available as they didn't have any existing system in place that they could adapt or add to.

In these cases, queueing systems have been well-managed by local authorities, with few reported incidents of frustration leading to aggression. Authorities have employed traffic control experts and have liaised with local police forces and highway authorities to enable traffic signs, cones and routes to be clearly laid out and well-managed.

Site staff have been only allowing an agreed number of vehicles on site at any one time and have been ensuring good and regular communication along the queue of vehicles – telling people how long they are going to have to wait. At an agreed time prior to site closure, staff or traffic managers have been warning those queueing that they might not have time to access the site and that it's their choice whether to risk staying in the queue and the site closing or leaving and visiting another day.

Now that local authorities have tried and tested ways of introducing managed queueing at sites, this is another form of control that could be re-implemented if necessary.

Benefits of the measures for dealing with the Covid-19 pandemic at HWRCs

The measures implemented to manage HWRC may have many positive aspects, including:

- It allows local authorities and their contractors to control site demand and have a smoother flow of inputs and outputs from the sites.
- It has potential to reduce abuse of staff on site and at access points.
- It has created tried and tested systems to control site use, for if there is a resurgence of the pandemic or other emergency situations.
- It has enabled the collation of increased information and data on site use.
- It is helping with increased segregation of materials for recycling and reuse and reduced residual waste.
- It promotes increased interaction between site staff and site users and can enable increased education opportunities, helping to inform the public, with positive behaviour-change as a result.

Ultimately, users of HWRCs, who have a positive, well-managed experience, might take the time to think more about the stuff they bring and that it might have a value.

Appendix D Contract incentives and penalties examples

Devon County Council: Devon County Council created a residual waste diversion target-based contract with their waste contractor. The contractor is not obliged to meet the target, but a bonus is given when it is achieved, and a penalty awarded if not. The target was introduced around 15 years ago and was increased by a percentage every year (by 0.25%) to boost performance. Once the sites achieved a high-performance level (70-80%) continued increases became unsustainable. At this point the diversion rate was set at 80%, with only 20% going to disposal.

Bonus payments replicated the avoided disposal costs (£100 per tonne). Bonuses were originally based on recycling performance alone but now include recycling and recovery to focus on residual waste reduction. The target is more difficult now as the EA is more restrictive on recycling activities. For example, many uses of recycled wood, such as animal bedding, are no longer permitted and so the only viable option for poor quality wood is biomass. Penalties were set higher at £120 per tonne and provide an important measure to

prevent poor performance. Use of this system rather than a contractual minimum performance targets helps prevent contract breaks and renegotiation or an expensive re-procurement exercise.

A separate re-use target is also written into the waste contract to incentivise re-use. This is set at 0.75% of total site throughput. Re-use revenue is shared evenly between DCC and the contractor. The bonus equates to equally shared revenue from re-use between DCC and Suez. The penalty for not meeting the target is set at £200 per tonne.

Dorset Waste Partnership: A target and bonus system is in place to minimise waste whilst promoting better segregation of materials, based around those material streams the Council pays for (green waste, wood and residual). Where targets are met the Partnership shares 30% of the avoided gate fees as a bonus. The contract also includes a clause that ensures the payment is shared with site staff as further incentive. Whilst this results in a relatively small loss to the contractor it translates to a good incentive for individual members of staff.

If performance falls 5% below the target a contract-default situation is triggered, so that the Partnership is protected if expectations are not met. A default escalator is applied to the recycling target each year to year to drive continued performance. However, targets are agreed annually together to remain realistic.

The two-part incentive system drives high performance, reduced costs and avoids unintended consequences. A recycling rate target alone may not incentivise a contractor to strictly enforce charging for non-household waste streams such as plasterboard that would otherwise inflate recycling figures. The system has flexibility to adapt to external influences that affect waste arisings and recycling rates such as unexpected weather patterns. A recycling target of 71.5% is set across whole HWRC network.

Durham County Council: Durham has 12 HWRCs with an additional one mobile site for rural Upper Weardale. The high-performance rates achieved on these HWRCs are attributed mainly to having had a well-defined and executed procurement process. It ensured that written into the specifications of the contract was a minimum of 70% recycling rate and 90% total diversion of waste from landfill.

The total diversion rate currently sits at 82% including rubble and material sent to RDF. The total recycling rate across all sites excluding rubble was 66% in 2017/18. The diversion rate had been higher but due to the loss of mattress and carpet recycling facilities it has declined in recent years and a new target of 80% (including rubble) was agreed. The effectiveness of the council's relationship with their contractor means that despite these challenges HWRCs are still able to maintain strong recycling rates.

Luton Borough Council: The current contract here is managed through a public-private partnership with a waste contractor until 2021. The partnership is based on a 'unitary' rate, with financial rewards for recycling performance to ensure recycling rates on site continue to increase. A 60% minimum recycling rate is specified in the contract with contractual conditions in place to penalise the waste contractor if the target is not achieved. The target is continually increased and initially started at 45%. The minimum contracted rate has resulted in reduced complaints from the public and a general improvement in recycling rates, with a recycling rate of over 70% currently being achieved.

Merseyside Recycling and Waste Authority: Merseyside is under a Waste Management and Recycling Contract which includes operation of 14 HWRCs and two Material Recovery Facilities. The contract recycling rate target is 53%, which due to use continuous improvements and positive incentive mechanisms has been exceeded (70%). The lower contract target reflected the HWRC performance at the time of contracting in 2009. There is a commitment to improve recycling performance and move up the waste hierarchy wherever possible, however it is acknowledged that this becomes more challenging as the easy

wins have been achieved, and due to financial constraints. Waste disposal costs are levied (under the EPA powers) from the Waste Collection Authorities. Levy costs are based on tonnage and population in each council area. An additional 24,000 tonnes were recycled above target in 2017/18, giving savings of circa £150,000 due to cost-effectiveness improvements. 2017/18 was the highest performing year since 2009 despite the highest tonnage throughput.

Nottingham City Council: Nottingham City Council has one HWRC, with an additional four HWRCs run by Nottingham County Council. The City Council currently has the highest HWRC recycling rate in England. The existing contract includes a target and bonus system with financial rewards available where the contractor exceeds an 85% recycling and diversion rate, meaning no more than 15% can be landfilled. Bonuses are linked to the avoided landfill cost currently equating to £69/tonne. The contract includes a bonus scheme to incentivise the contractor and their staff.

A summary of responses to Cheshire East Council's

Household Waste Recycling Centre Consultation

Version 1

Contents

Report produced on 18 January 2021 by the Research and Consultation Team, Cheshire East Council, Email RandC@cheshireeast.gov.uk for further information.

Executive summary and conclusions

Between 23 November 2020 and 4 January 2021 Cheshire East Council consulted on various options for future Household Waste Recycling Centre (HWRC) provision in the borough. The results of which will be used to inform the future design and procurement process of a new provider of the service

The options presented were based on an independent review commissioned by the Council to assess alternative service scenarios, as the current contract comes to an end within the next 3 years. The options presented as part of the consultation were:

- **Remain with current service:** Replacement of Congleton site
- **Alternative service: Scenario 4**: Closure of Congleton & Poynton
- **Alternative service: Scenario 3:** Closure of Congleton, Middlewich & Poynton
- **Alternative service: Scenario 2:** Closure of Bollington, Congleton, Middlewich & Poynton
- **Alternative service: Scenario 1:** Closure of Alsager, Bollington, Congleton, Middlewich & Poynton

Support was greatest for the option '**Remain with current service'** (59% overall, tend to or strongly support), with opposition increasing in each alternative scenario where a HWRC site was being proposed to close (65% overall, tend to or strongly oppose '**Scenario 4**' increasing to 97% for '**Scenario 1'** Generally, in each scenario opposition was greatest with the HWRC users whose nearest site was identified, apart from '**Scenario 1'** where opposition was strong across all HWRC users.

The impact of each option, upon respondents, followed a similar pattern to that noted above with '**Remain with current service'** reported as having the least impact (51% overall, fairly or very low impact). For '**Scenario 4'**, 53% overall, stated that it would have a fairly or very high impact on them personally, increasing to 95% for '**Scenario 1'**. The likely impact again was generally reported as being greatest by those HWRC users whose nearest site(s) were identified as potentially being closed.

74% of respondents stated that they would be willing to travel up to 10 minutes to reach a HWRC site, 24% would be willing to travel 10 to 20 minutes. With the current service it seems that many respondents reside within a 10-minute drive time to their nearest HWRC. However, this would not be the case for certain respondents within a number of the alternative scenarios.

Within the survey respondents were asked to provide any comments / considerations we may need to be aware of as part of this review. The top themes emerging from the comments were around the environmental impacts closing sites may cause for example, concern about fly tipping, carbon footprint, pollution and congestion, misuse of kerbside bin collections and reduction in recycling rates. Other concerns included the increased time / cost it would take to travel to an alternate site including an increased difficulty for those of an older age/ the disabled and increase in demand due to new houses being built. Some suggestions and general comments were also received.

Further details of the comments will be available in the next version of this report.

The Research and Consultation team recommend that the findings in this report are reviewed and considered alongside any other evidence whilst making a decision.

Introduction

Purpose of the consultation

Between 23 November 2020 and 4 January 2021 Cheshire East Council consulted on various options for future Household Waste Recycling Centre (HWRC) provision in the borough.

The options presented where based on an independent review commissioned by the Council to assess alternative service scenarios as the current contract comes to an end within the next 3 years. The full review conducted is available on the Cheshire East Website.

Consultation methodology and number of responses

The consultation was mainly held online (due to the current Covid-19 restrictions) with paper versions being available on request. It was promoted to:

- HWRC Users, via posters at all Cheshire East Council HWRC sites
- The general public, via the council webpage, social media sites and through a press release.

The consultation picked up a lot of interest and was mentioned in numerous news articles. In total, 10, 208 consultation responses were received, including:

- 10,173 online survey responses
- 4 paper survey responses
- 31 email responses

We are also aware of 1 petition on change.org ‘Save our Congleton Recycling Centre’ this petition is currently still ongoing, at the time of writing this report it has received around 1,900 signatures.

A breakdown of demographics for the online & paper survey can be viewed in Appendix 1.

Section 1 – Current use of HWRC sites

As part of the, survey respondents were asked how often approximately, in a typical 12-month period, do they visit each of the current HWRC sites within Cheshire East. This question was asked to gain an insight into respondent usage and doesn't reflect actual usage of the sites in a typical 12-month period.

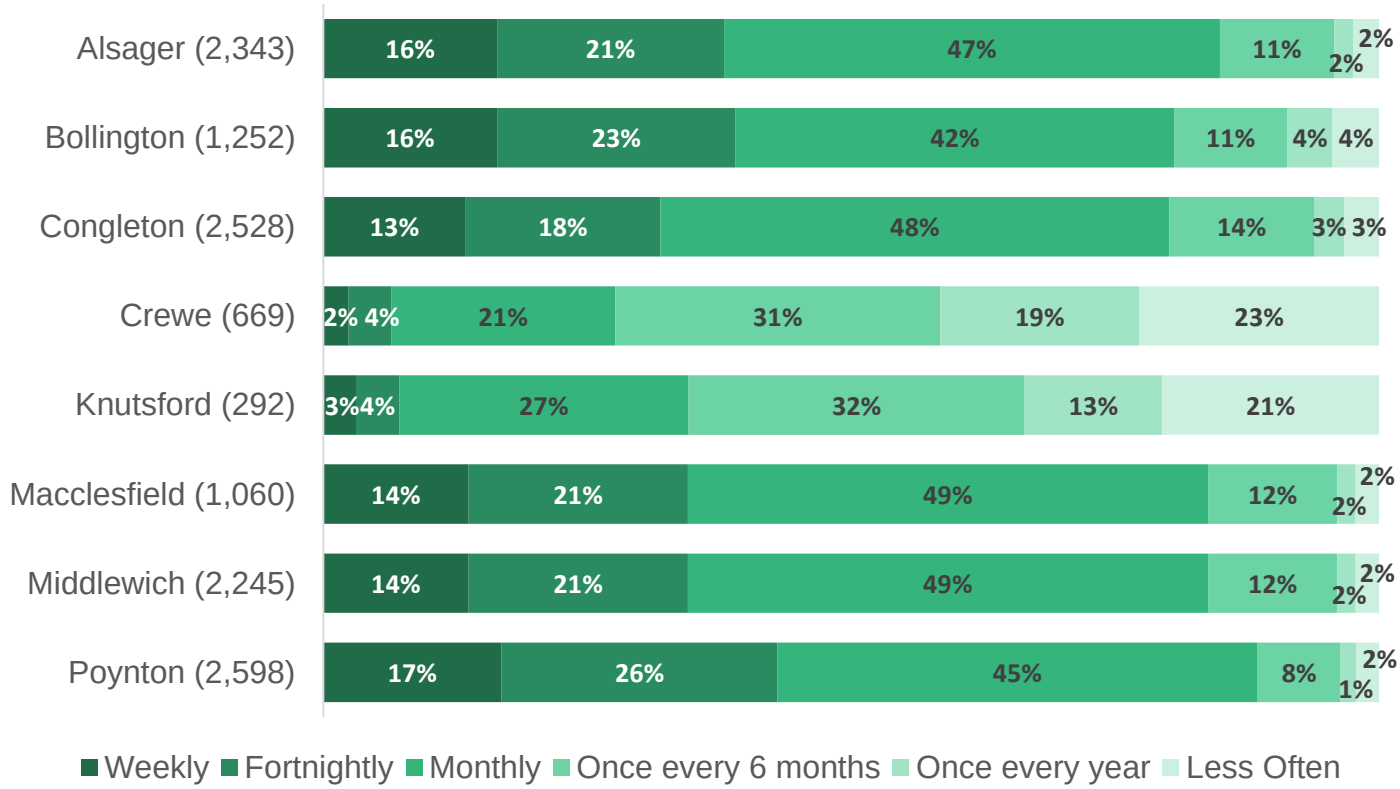
Figure1 shows the breakdown of results, excluding those who stated never. For most of the HWRC site's respondents represent frequent users - typically visiting monthly or more often:

- Alsager, 85% typically visit monthly or more often
- Bollington, 81% typically visit monthly or more often
- Congleton, 80% typically visit monthly or more often
- Macclesfield, 84% typically visit monthly or more often
- Middlewich, 84% typically visit monthly or more often
- Poynton, 88% typically visit monthly or more often

For Crewe and Knutsford HWRC sites however, respondents represented less frequent users visiting once every 6 months or less often:

- Crewe, 72% typically visit once every 6 months or less often
- Knutsford, 65% typically visit once every 6 months or less often

Figure 1: How often respondents visit Cheshire East HWRC sites in a typical 12-month period (excluding those who stated never)



Many respondents (83%) had visited only one Cheshire East HWRC site within a typical 12-month period, 16% had visited two different sites and 5% had visited more than two different sites.

Table 1 below, provides further insight into respondent distribution per HWRC site. Users of Alsager, Congleton, Middlewich and Poynton HWRC represent around one quarter of the overall response each. Bollington HWRC Users represent 12% of the overall response.

Please note that percentages won't add up to 100 as respondents could specify that they use more than one HWRC site.

Table 1: User count by HWRC and Percentage of total response

HWRC Site	User Count	Percentage of total respondents
Alsager	2,343	23%
Bollington	1,252	12%
Congleton	2,528	25%
Crewe	669	7%
Knutsford	292	3%
Macclesfield	1,060	10%
Middlewich	2,245	22%
Poynton	2,598	26%
Total Respondents	**10,177**	

Within section 2 of the report, the main results are shown overall and are also broken down by site users (excludes those who stated that they had never visited for each HWRC site).

Section 2 – The options

Respondents were presented with a table providing a snapshot of each option being considered by the Council as part of the review. A summary document which gave more detail on the options was also provided as well as a link to the full independent review document.

The options presented were:-

- **Remain with current service:** Replacement of Congleton site
- **Alternative service: Scenario 4**: Closure of Congleton & Poynton
- **Alternative service: Scenario 3:** Closure of Congleton, Middlewich & Poynton
- **Alternative service: Scenario 2:** Closure of Bollington, Congleton, Middlewich & Poynton
- **Alternative service: Scenario 1:** Closure of Alsager, Bollington, Congleton, Middlewich & Poynton

After respondents reviewed the information, they were asked how strongly they supported or opposed each option as well as what impact each option would have on them personally. The rest of this section of the report looks at the results received for each option in turn.

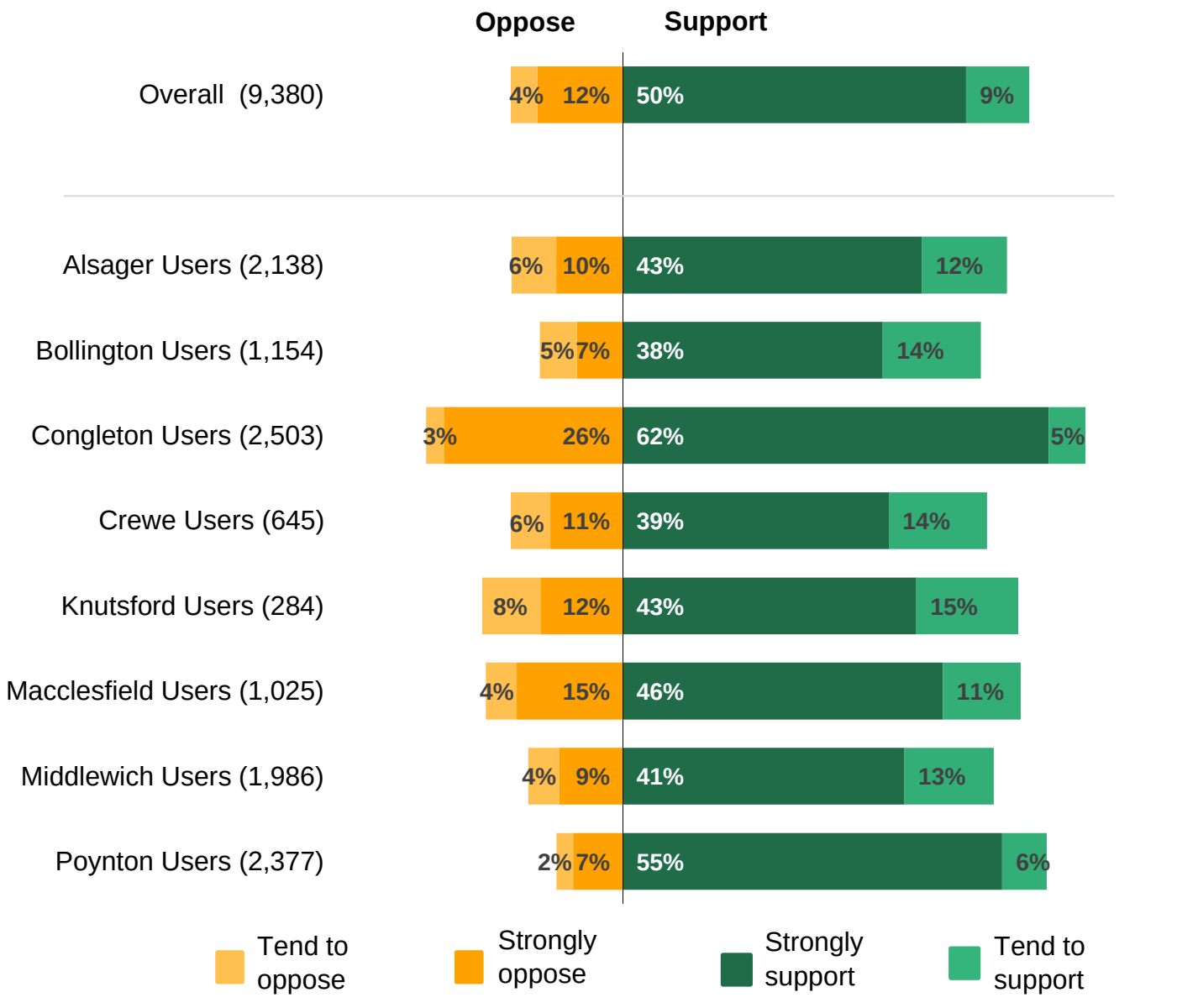
Please note that 'users' excludes those who stated that they had never visited for each HWRC site.

Remain with current service

Under this option Congleton HWRC Site would need to be replaced in order to maintain current levels of service. The current site is not owned by the Council and a long-term lease of this land has not been able to be secured.

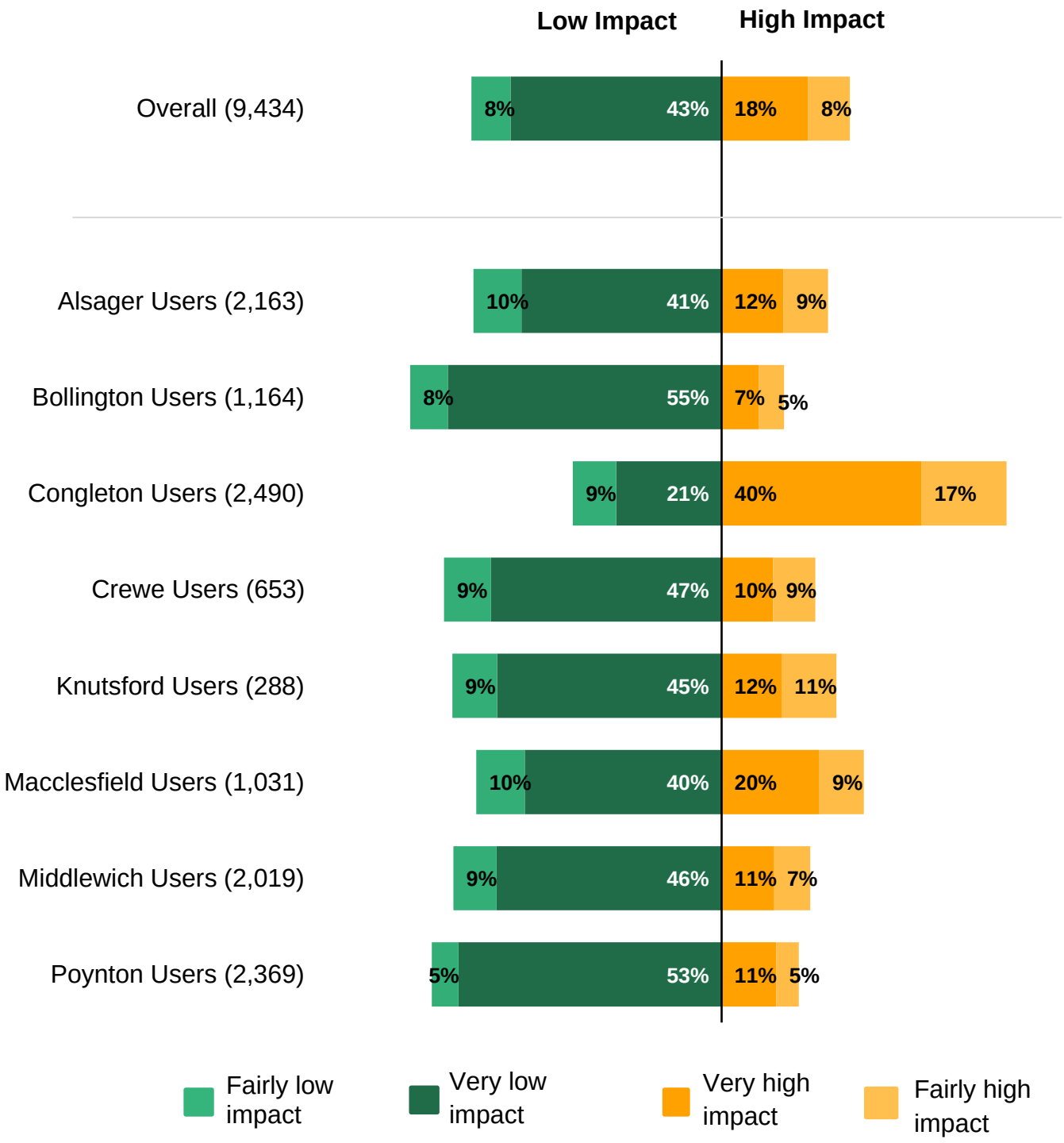
Over one half of all respondents (59%) stated that they strongly or tend to support this option overall. Congleton HWRC Site users were more likely to strongly support this option compared to other site users (62% strongly support). Conversely, they were also more likely to strongly oppose this option (26% strongly oppose). This possibly represents those who do not want the site to be replaced or to change location and would rather it remain where it is. Figure 2 shows the percentage of those that stated oppose or support broken down by each HWRC site users. The remainder of the respondents (not shown on Figure 2) either selected 'neither support nor oppose' or 'don't know / unsure'.

Figure 2: Percentage of those stating oppose or support to the option: Remain with current service, overall and broken down by HWRC site users



Just over one half of all respondents (51%) stated that this option would have a fairly or very low impact on them personally. Even though Congleton HWRC users were more likely to support this option they were also more likely to state that this option would impact them personally (58% very or fairly high impact compared to 26% Cheshire East overall). This probably reflects those who may feel that a replacement site / change in location to the current site would impact them and their current use.

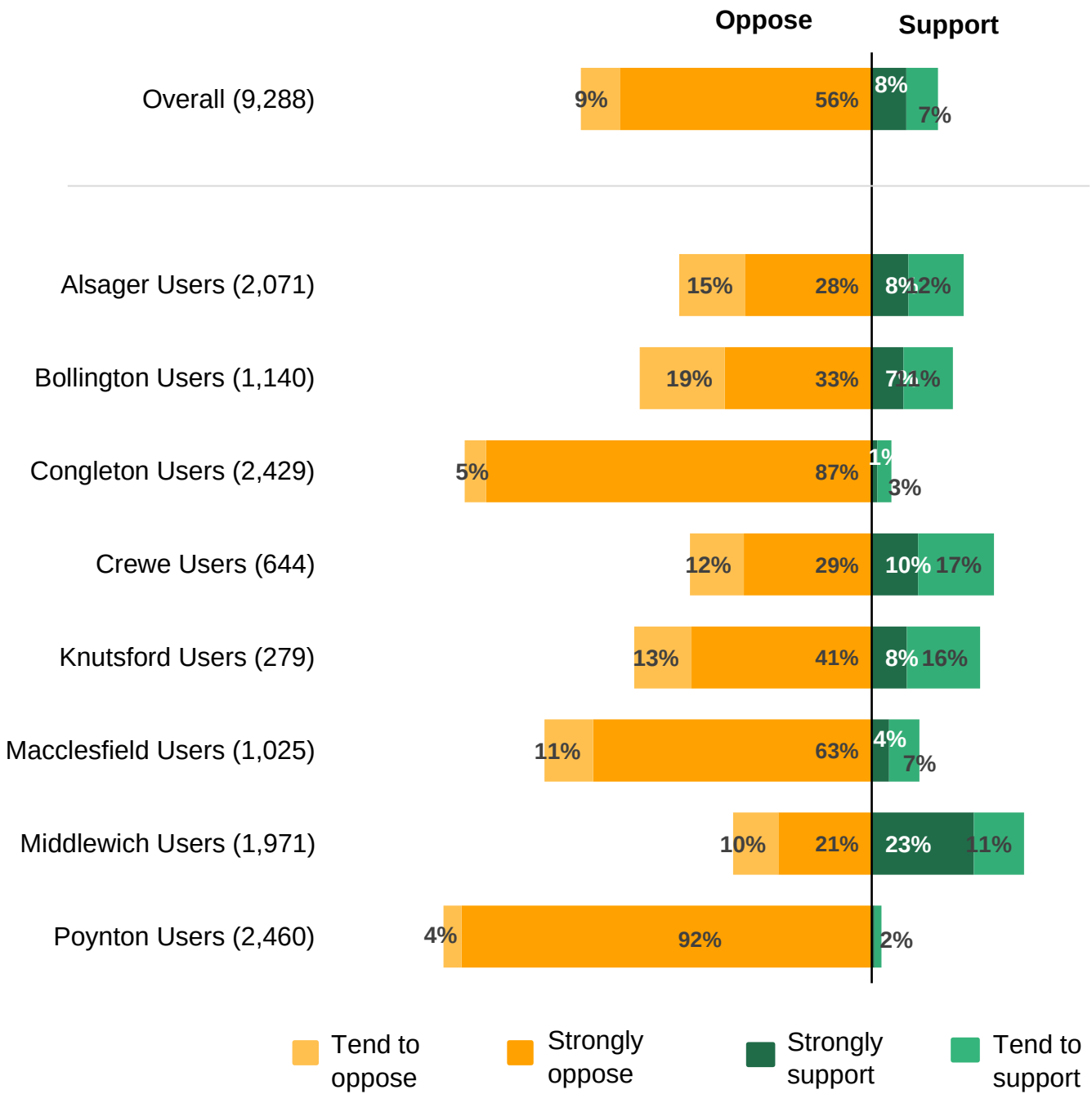
Figure 3: Percentage of those stating that the option: Remain with current service, would have a low impact or high impact on them personally, overall and broken down by HWRC site users



Alternative service: Scenario 4

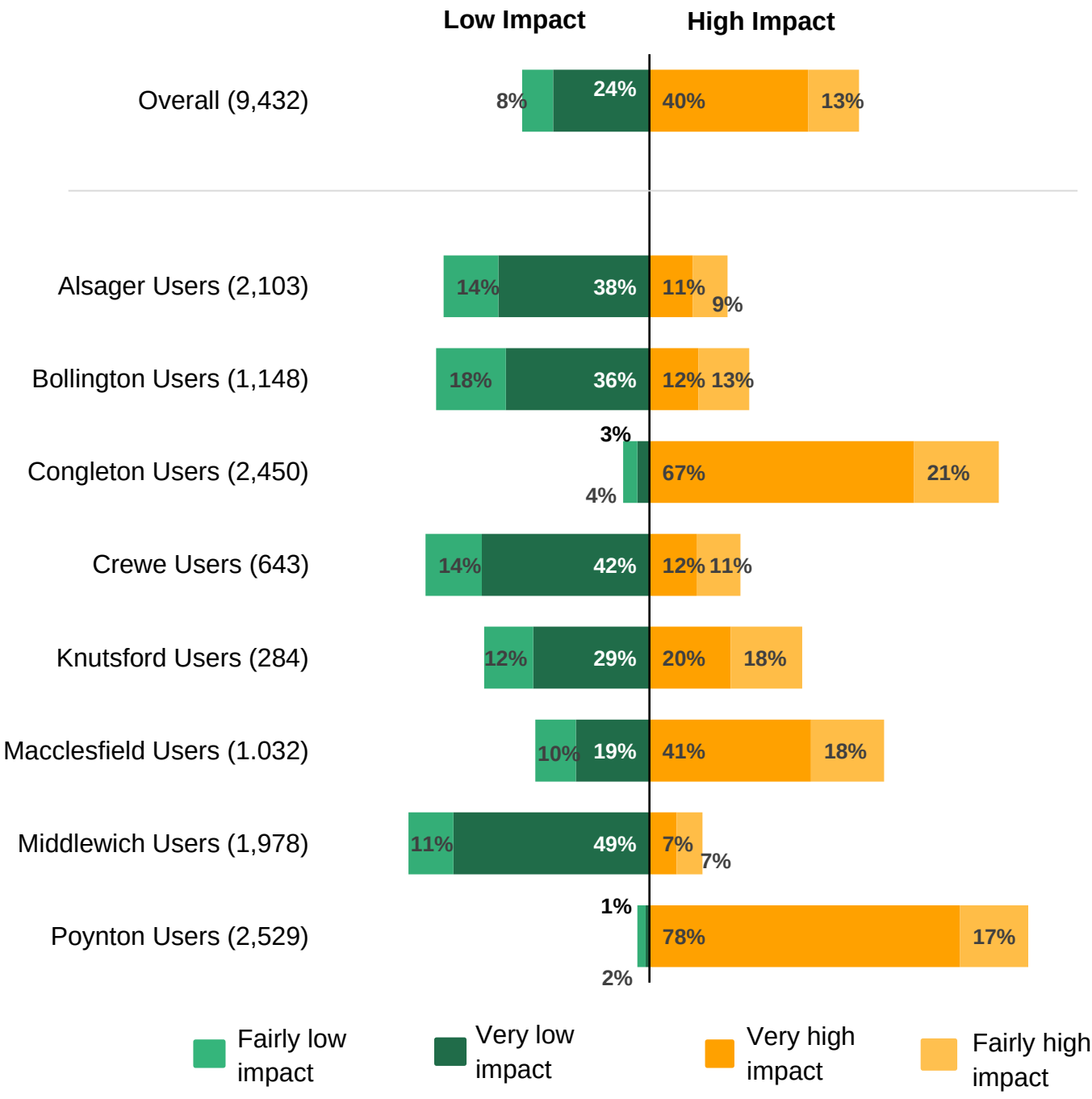
The majority of respondents opposed this option with 65% stating that they tend to or strongly oppose this option overall. Both Congleton and Poynton HWRC would close in this scenario, unsurprisingly users of these sites were more likely to oppose this option compared to the other HWRC site users (92% and 96% oppose respectively). The remainder of the respondents (not shown on figure 4) either selected 'neither support nor oppose' or 'don't know / unsure'.

Figure 4: Percentage of those stating oppose or support to the option: Alternative service Scenario 4, overall and broken down by HWRC site users



Just over one half of all respondents (53%) stated that this option would have a fairly or very high impact on them personally. Congleton and Poynton HWRC users were more likely to state that this option would personally impact them (88% and 95% respectively). Macclesfield HWRC users state a slightly greater impact compared with the other remaining HWRC users, 59% feel that this scenario would impact them (see figure 5). This might represent those with a concern that closing Poynton HWRC would mean greater use of the Macclesfield HWRC site as the next closest site.

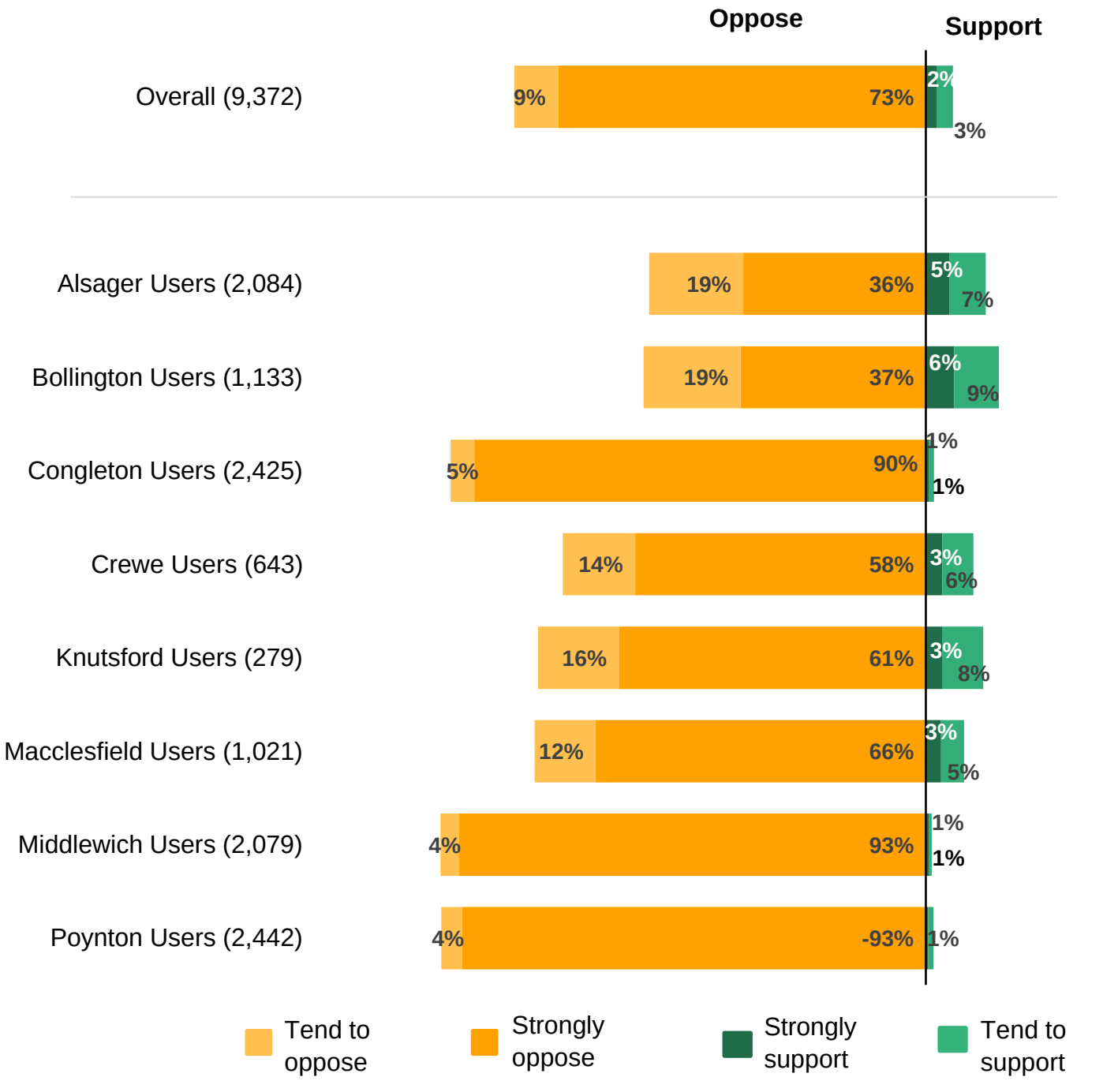
Figure 5: Percentage of those stating that the option: Alternative service Scenario 4, would have a low impact or high impact on them personally, overall and broken down by HWRC site users



Alternative service: Scenario 3

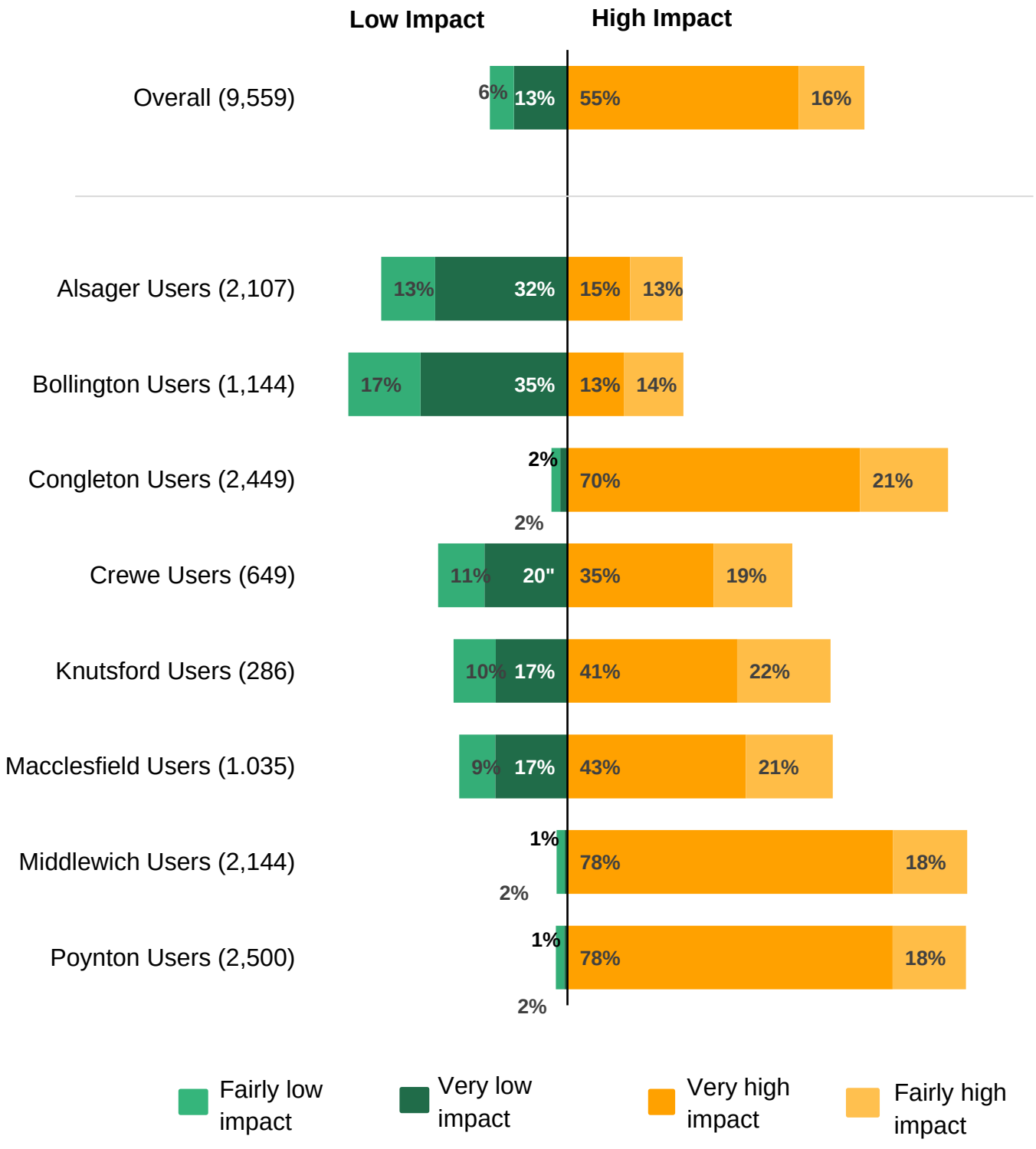
A high majority of respondents opposed this option with 82% stating that they tend to or strongly oppose this option overall. Congleton, Middlewich and Poynton HWRC sites would close in this scenario. Again, it's the users of these sites who show the greatest opposition compared to other HWRC site users (95%, 97% and 97% respectively) as shown in figure 6. The remainder of the respondents (not shown on figure 6) either selected 'neither support nor oppose' or 'don't know / unsure'.

Figure 6: Percentage of those stating oppose or support to the option: Alternative service Scenario 3, overall and broken down by HWRC site users



Overall, 71% stated that this option would impact them personally. Congleton, Middlewich and Poynton HWRC users were more likely to state that this option would personally impact them (91%, 96% and 95% respectively).

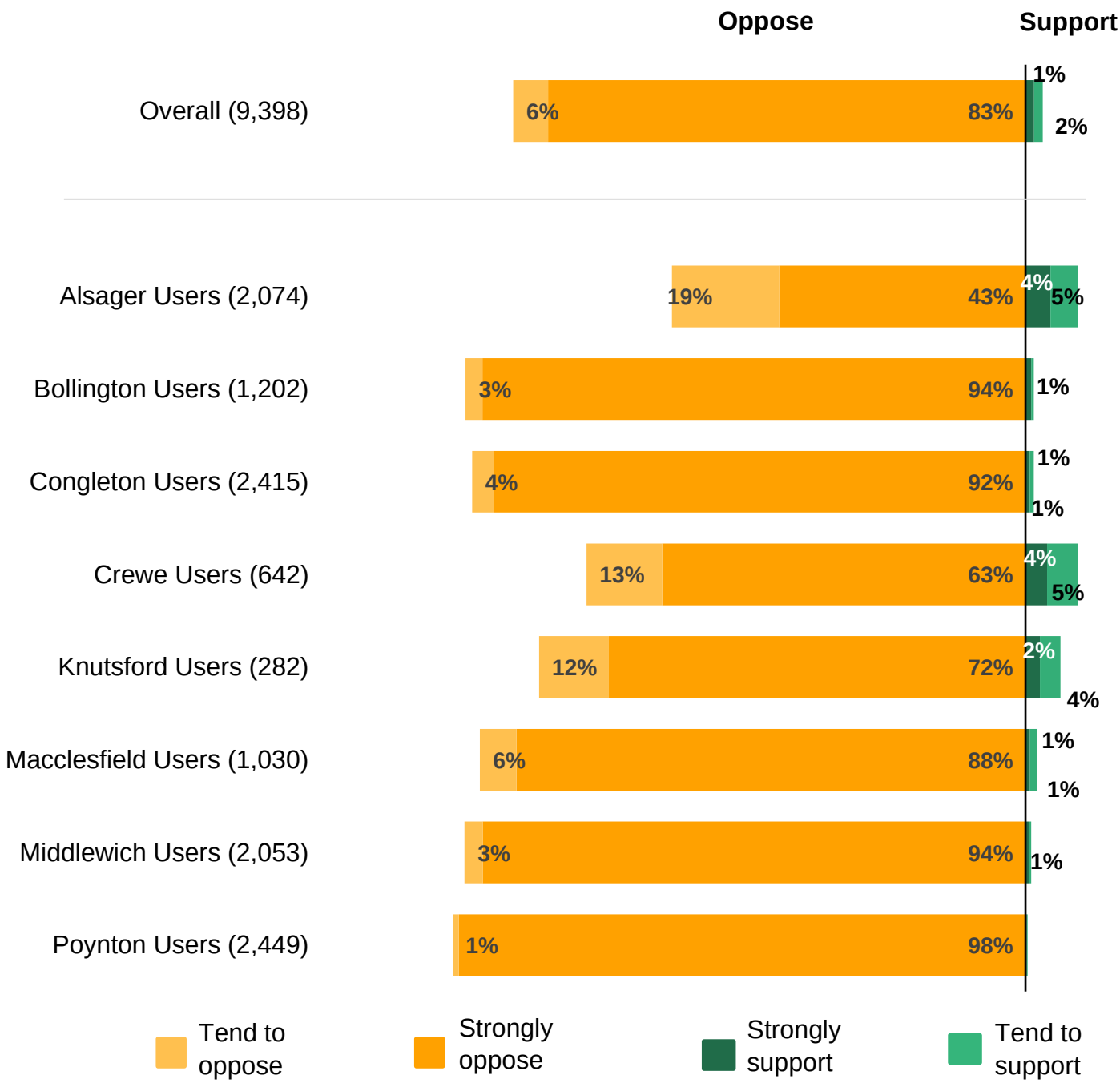
Figure 7: Percentage of those stating that the option: Alternative service Scenario 3, would have a low impact or high impact on them personally, overall and broken down by HWRC site users



Alternative service: Scenario 2

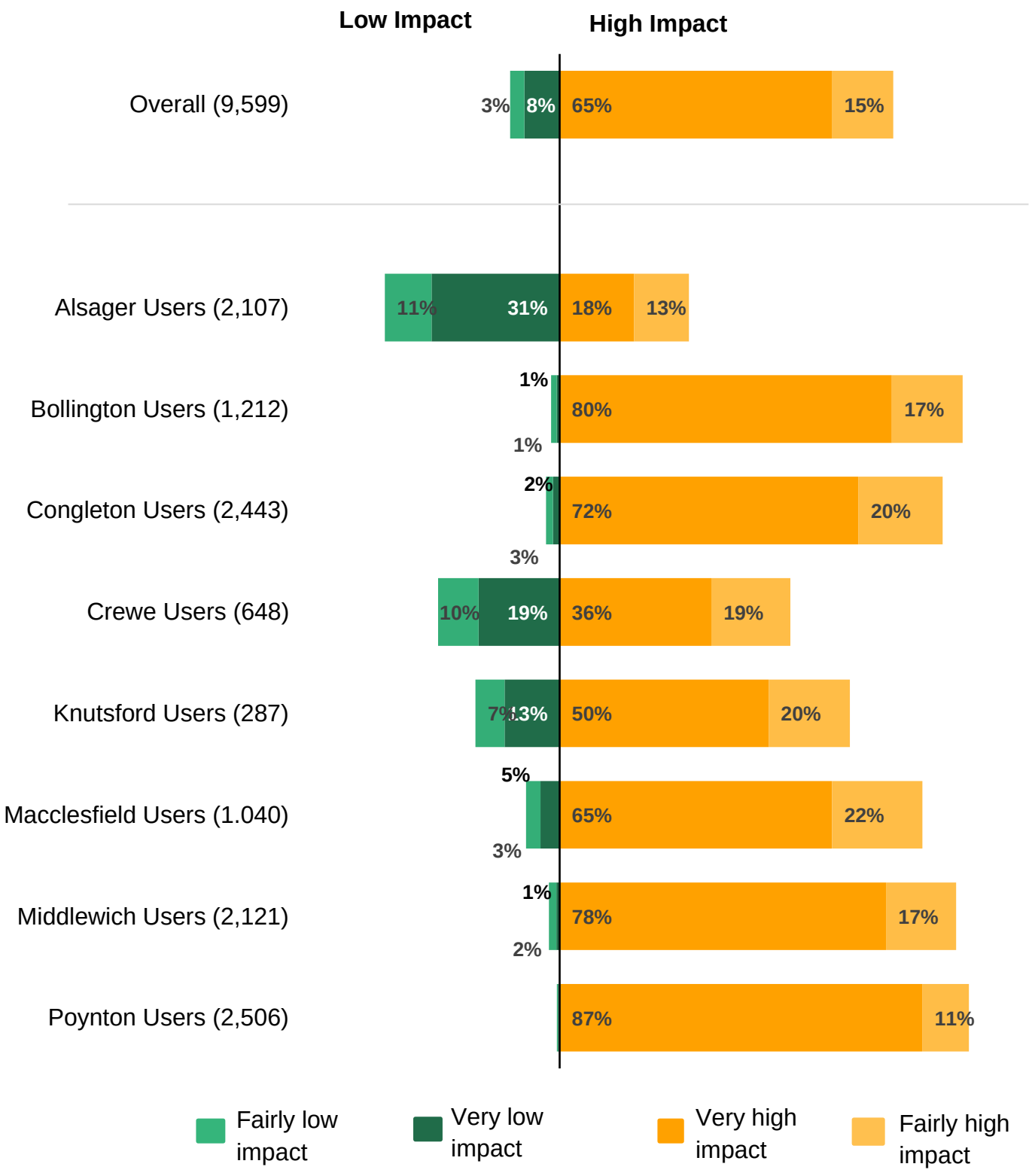
A high majority of respondents opposed this option with 89% stating that they tend to or strongly oppose this option overall. Bollington, Congleton, Middlewich and Poynton HWRC sites would close in this scenario as such it was users of these sites who were more likely to oppose this option compared to other HWRC site users (97%, 96%, 97% and 99% respectively) as shown n figure 8. The remainder of the respondents (not shown on figure 8) either selected 'neither support nor oppose' or 'don't know / unsure'.

Figure 8: Percentage of those stating oppose or support to the option: Alternative service Scenario 2, overall and broken down by HWRC site users



Overall, 80% stated that this option would impact them personally. Bollington, Congleton, Middlewich and Poynton HWRC users were more likely to state that this option would impact them personally (97%, 92%, 95% and 98% respectively) as shown n figure 9.

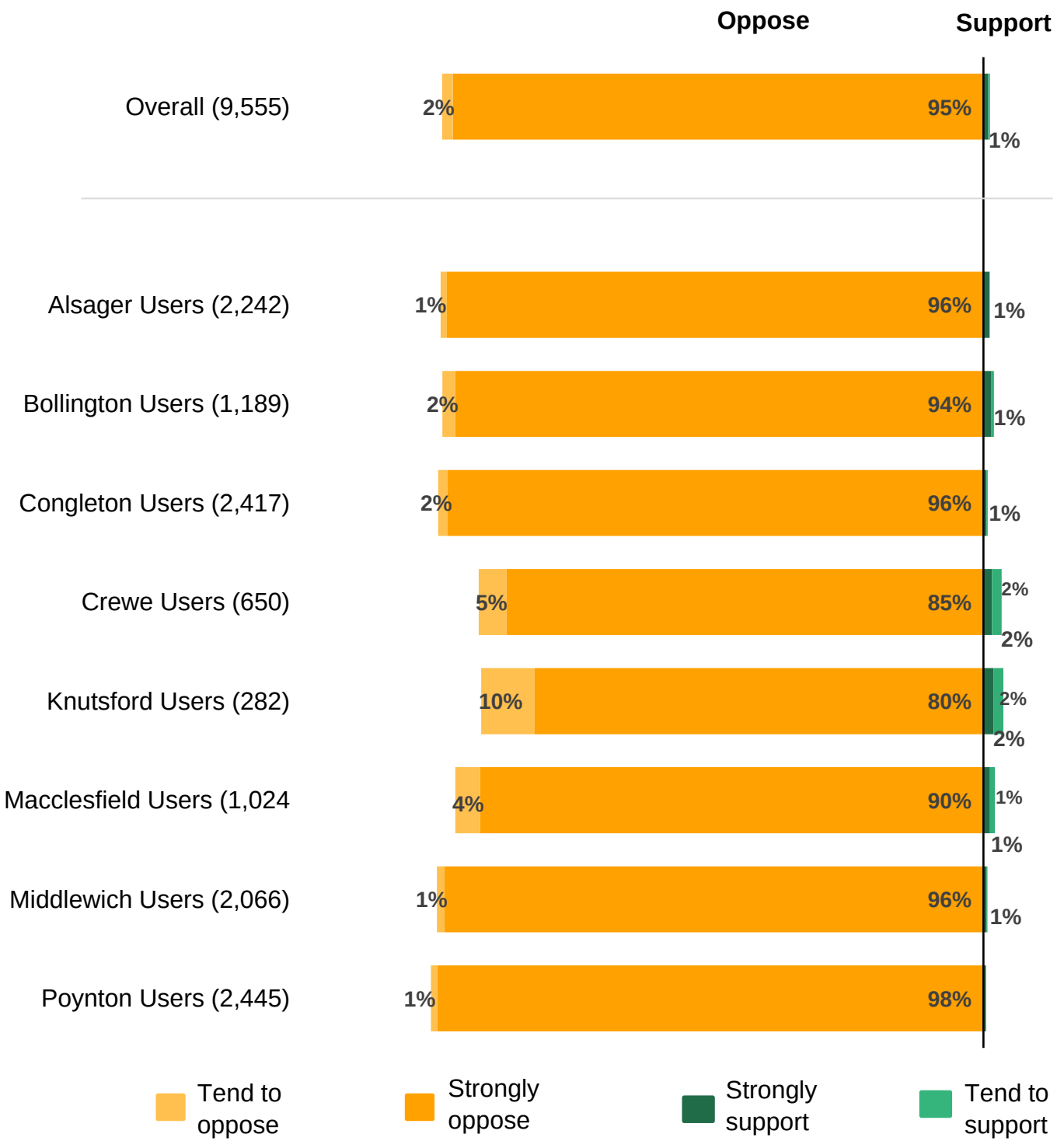
Figure 9: Percentage of those stating that the option: Alternative service Scenario 2, would have a low impact or high impact on them personally, overall and broken down by HWRC site users



Alternative service: Scenario 1

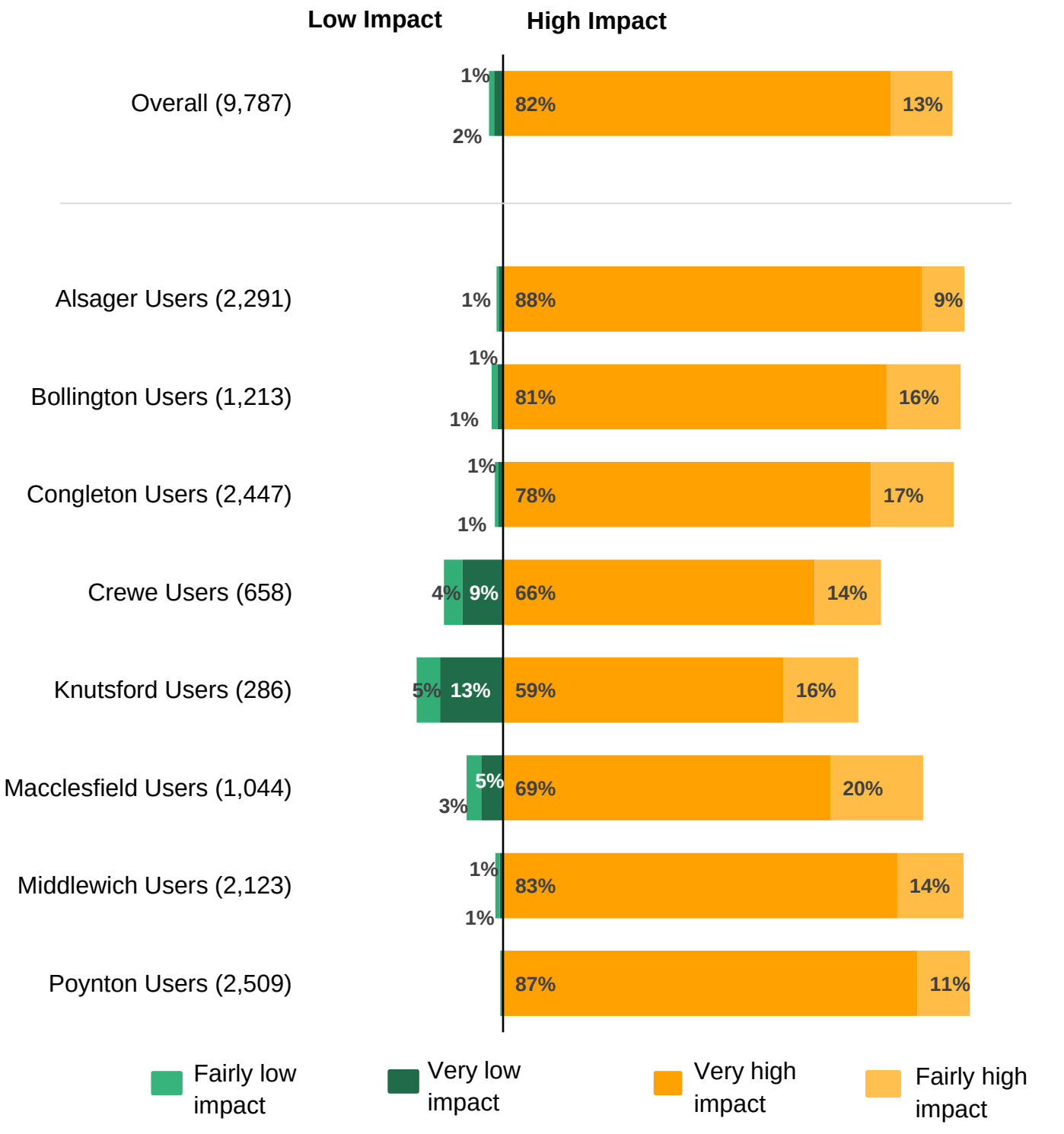
Almost all of respondents opposed this option with 97% overall stating that they tend to or strongly oppose this option. Alsager, Bollington, Congleton, Middlewich and Poynton HWRC sites would close in this scenario. Opposition was strong amongst all HWRC site users for this scenario as figure 10 shows. The remainder of the respondents (not shown on figure 10) either selected 'neither support nor oppose' or 'don't know / unsure'.

Figure 10: Percentage of those stating oppose or support to the option: Alternative service Scenario 1, overall and broken down by HWRC site users



Impact was high amongst nearly all HWRC users (95% very or fairly high impact). Crewe and Knutsford HWRC users were slightly less impacted personally compared to the other HWRC site users as figure 11 shows.

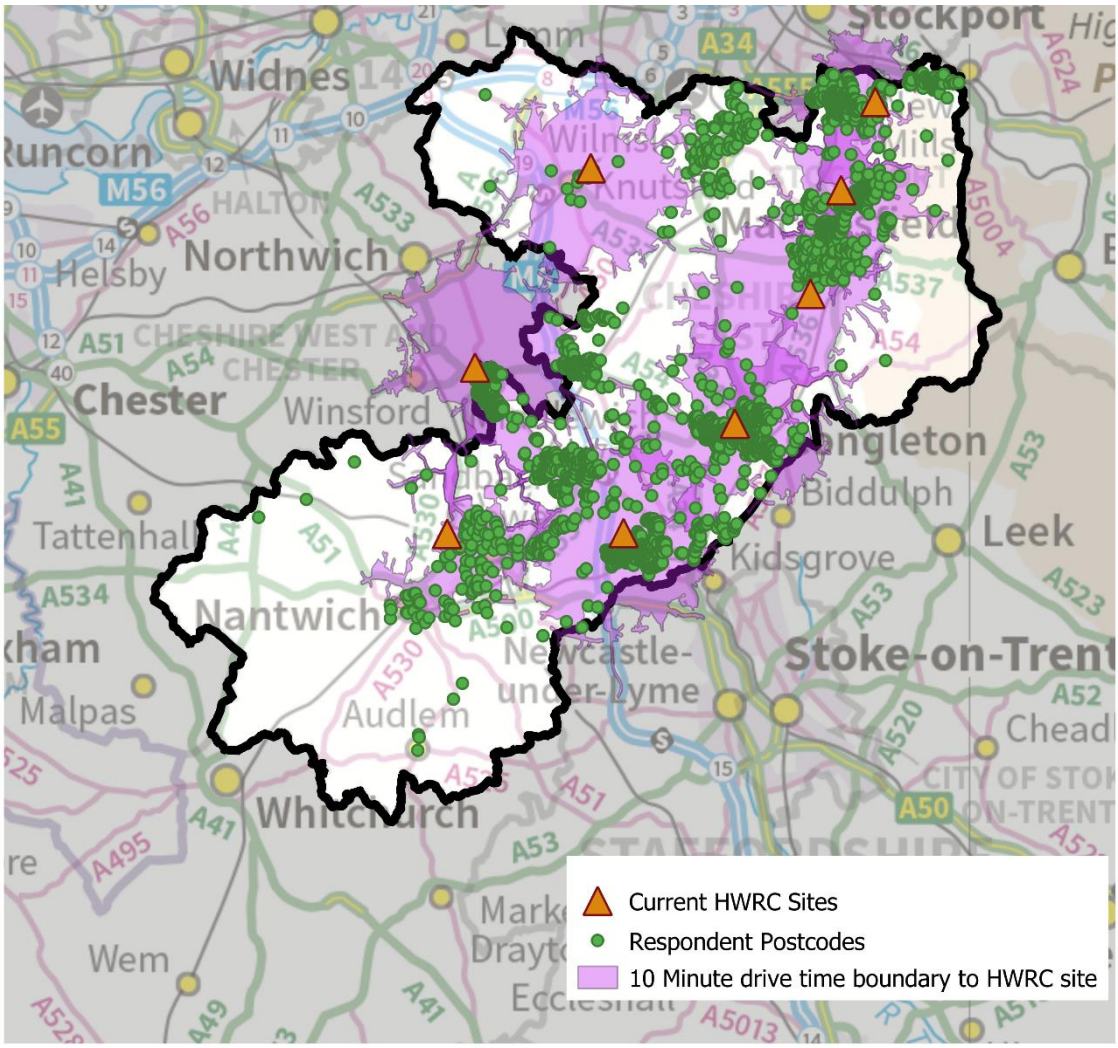
Figure 11: Percentage of those stating that the option: Alternative service Scenario 1, would have a low impact or high impact on them personally, overall and broken down by HWRC site users



How long willing to travel

74% of respondents stated that they would be willing to travel up to 10 minutes to reach a HWRC site, with 24% willing to travel 10 to 20 minutes. The map below plots respondent postcodes (those that left a valid postcode, 8,822 respondents) against the current HWRC sites and a 10-minute drive time to each site. With the current service, it seems that many respondents live within a 10-minute drive time to their nearest HWRC. However, this would not remain the case for many respondents, for a number of the given alternative scenarios.

It is worth noting here, that even though respondent preference is a 10 minute drive time to their nearest HWRC, the Waste and Resources Action Partnership (WRAP) guidance suggests there should be a maximum driving time (for the great majority of residents in good traffic conditions) of twenty minutes (30 minutes in very rural areas) - this is looked at in the independent review documentation.



Cheshire East Council

Current HWRC sites with 10 minute drive time boundaries and respondent postcodes

1:1

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Section 3 - Comments / Considerations

Respondents were asked if they had any comments or considerations on the options presented within the consultation. A total of 6,049 respondents chose to leave a comment. Comments received through emails (31 responses) will also be included as part of this analysis.

Please note: This section highlights the top-level themes that have emerged from the comments. Further details of the comments including the number of references received for each theme will be available in the next version of this report.

Theme 1: Keep our HWRC Open

Respondents specifically expressed that their HWRC site was well utilised / always busy and therefore should remain open. The HWRC's specifically mentioned were: Alsager, Bollington, Congleton, Middlewich and Poynton.

Theme 2: Environmental impacts / concerns

Respondents expressed great concern about an increase in fly tipping**,** carbon footprint, pollution and congestion if HWRC's were to close**.** Misuse of household waste bins as well as a reduction in recycling rates were also factors brought up as key environmental concerns.

Theme 3: Time, costs or demand

The impact of new houses and increasing population on the demand for HWRC services was mentioned as well as the inconvenience and increased cost of having to travel further to an alternate site. There were specific mentions to disability / age making it difficult for long travel. Others felt that they pay enough Council tax to cover the service so it shouldn't be removed.

Theme 4: Alternative suggestions

Some respondents gave an alternative income generating suggestion including introducing a charge for use of the tip / a charge to dispose of non-recyclable waste. Others gave an alternative scenario suggestion including a reduction in the opening times of HWRC sites.

Theme 5: General comments / concerns

General comments on personal use and concerns not directly related to the options were also received.

Appendix 1 – Demographic breakdowns

A number of demographic questions were asked at the end of the survey to ensure there was a wide range of views from across different characteristics. All of the questions were optional and therefore won't add up to the total number of responses received.

Table 1: Number of survey respondents by representation

	Count	Percent
As an individual (local resident)	9,995	98%
As an elected Cheshire East Ward Councillor, or Town/Parish Councillor	62	< 5%
On behalf of a local business	56	< 5%
On behalf of a group, organisation or club	34	< 5%
Other	46	< 5%
Grand Total	**10,153**	**100%**

Table 2: Number of survey respondents by gender

	Count	Percent
Male	5,273	54%
Female	4,148	42%
Other gender identity	< 5	< 5%
Prefer not to say	413	< 5%
Grand Total	**9,837**	**100%**

Table 3: Number of survey respondents by age group

	Count	Percent
16-24	165	< 5%
25-34	1,004	10%
35-44	1,990	20%
45-54	2,307	23%
55-64	2,069	21%
65-74	1,569	16%
75-84	437	< 5%
85 and over	41	< 5%
Prefer not to say	352	< 5%
Grand Total	**9,934**	**100%**

Table 4: Number of survey respondents by ethnic origin		
	Count	**Percent**
White British / English / Welsh / Scottish / Northern Irish / Irish	9,008	92%
Any other White background	79	< 5%
Asian / Asian British	25	< 5%
Black African / Caribbean / Black British	12	< 5%
Mixed: White and Black Caribbean / African / Asian	34	< 5%
Other ethnic origin	29	< 5%
Prefer not to say	614	6%
Grand Total	**9,812**	**100%**

Table 5: Number of survey respondents by religious belief		
	Count	**Percent**
Christian	4,534	49%
Buddhist	29	< 5%
Muslim	17	< 5%
Hindu	10	< 5%
Jewish	5	< 5%
Sikh	<5	< 5%
Other religious belief	92	< 5%
None	2,954	32%
Prefer not to say	1,598	17%
Grand Total	**9,293**	**100%**

Table 6: Number of survey respondents by limited activity due to health problem / disability		
	Count	**Percent**
Yes	1,322	14%
No	7,306	77%
Prefer not to say	855	9%
Grand Total	**9,483**	**100%**

EQUALITY IMPACT ASSESSMENT

TITLE: Household waste recycling centre new contract service provision

VERSION CONTROL

Date	Version	Author	Description of Changes
	1.0	Andrew Dunstone	
	2.0	Andrew Dunstone	Addition of no change option in consultation
	3.0	Andrew Dunstone	Additional detail
	4.0	Andrew Dunstone	Addressing specific closures

CHESHIRE EAST COUNCIL - EQUALITY IMPACT ASSESSMENT

Stage 1 Description: Fact finding (about your policy / service /

Department	*Environment and Neighbourhood Services*		**Lead officer responsible for assessment**		*Andrew Dunstone* *Waste Contracts Manager*	
Service	*Environmental Services*		**Other members of team undertaking assessment**		*State the full title(s) of all person(s) supporting/ completing the assessment.*	
Date			**Version**			
Type of document (mark as appropriate)	**Strategy**	**Plan**	**Function**	**Policy**	**Procedure**	**Service** ✓
Is this a new/ existing/ revision of an existing document (please mark as appropriate)	**New**		**Existing**		**Revision** ✓	
Title and subject of the impact assessment (include a brief description of the aims, outcomes, operational issues as appropriate and how it fits in with the wider aims of the organisation) **Please attach a copy of the strategy/ plan/ function/ policy/ procedure/ service**	Household Waste Recycling Centre new contract service provision. The current HWRC contract ends in 2023 and therefore to give ample time to prepare for this a review of the service was carried out. A public consultation was carried out concerning the future shape of the household waste recycling centre (HWRC) contract. The volatility of the recycling market has severely affected the planned income from these materials, and therefore future contracts are expected to incur higher costs. An independent study was commissioned to model different scenarios and determine if they were feasible. The study showed that there is a generous supply of household waste sites, when compared with national guidelines, and that a reduction in these numbers was a viable option. The consultation considered the four scenarios from the study (all of which include the potential closure of sites) and a 'no change' option that included a replacement for Congleton household waste recycling centre, because the lease is ending in 2021. Following the consultation, the recommendation is to close the Congleton site in conjunction with new measures to provided fairer access to waste disposal services in rural areas of the borough through measures such as a mobile service. The recommendation takes into consideration results of the consultation balanced with the council's need to reduce estimated cost increases from 2023 in a new contract.					

Who are the main stakeholders, and have they been engaged with? (e.g. general public, employees, Councillors, partners, specific audiences, residents)	Members, general public, Town and Parish Councils
What consultation method(s) did you use?	Following acceptance at Cabinet a borough wide web-based consultation was commissioned. Due to the ongoing Covid situation the provision of readily available paper copies at our household waste recycling centres was not considered a sensible method of distribution. Similarly, we would usually ensure that all our libraries had copies, but these we closed. In order to ensure their availability, signs were up at each of our sites advertising the consultation and providing a QR code to be scanned – a familiar process for anyone out using the Covid track and trace app. An email address and phone number on the signs was available so that names and addresses could be taken, and a paper copy individually posted. A press statement was released on commencement of the consultation and this should ensure that all local media will pick it up and raise it with their readers. Engagement with the consultation was extensive with over 10,200 responses, of these over 6,000 made comments

Stage 2 Initial Screening

Who is affected and what evidence have you considered to arrive at this analysis? (This may or may not include the stakeholders listed above)	Residents who are users of our sites. Not replacing Congleton in 2021 will have the greatest impact on those residents served by the site. Evidence of this impact comes from the independent report commissioned to review the HWRC service - Residents will need to travel further to dispose of their recycling/waste. In addition to the time that residents would have to travel to more distant sites, the sites they go to would be busier. The spatial analysis forecasts that Macclesfield will see increased use with an estimated 9% more households visiting it. In addition, an environmental impact assessment has been carried out.
Who is intended to benefit and how?	The presentation of clear information to potential bidders of the new contract will enable them to determine whether this is a contract worth bidding for. The procurement of a good contract will then ensure that all users of our household waste recycling centres will receive a quality, value for money service.
Could there be a different impact or outcome for some groups?	Yes. The option of closure for Congleton will impact all groups that are in the vicinity and the sites that are most likely to receive additional users – Macclesfield and Alsager.
Does it include making decisions based on individual characteristics, needs or circumstances?	No. We feel that this does not affect individual characteristics because all users drive to the sites. In recognition of residents who rely on others to drive, it is expected that the new service provider will explore options to enable mobile units to be deployed.
Are relations between different groups or communities likely to be affected?	Possibly. Depending on the preferred option chosen the communities who may be losing a site could be disappointed that others are not affected in the same way however, all options comply with Waste Resources Action Programme Advice for provision for residents.

EQUALITY IMPACT ASSESSMENT

(e.g. will it favour one particular group or deny opportunities for others?)	
Is there any specific targeted action to promote equality? Is there a history of unequal outcomes (do you have enough evidence to prove otherwise)?	The public consultation will give all residents the opportunity to engage with the council and present their views. Proposals being consulted on all comply with general guidance on acceptable levels of provision for our population numbers and acceptable distance to travel to a household waste recycling centre. The new service provider will be required to show consideration of residents who are in more rural areas or with limited means of transport – this may be in the form of mobile units visiting these areas. Historically, residents without access to a vehicle were unable to use the sites, we are seeking to address this with the new service provider.

Is there an actual or potential negative impact on these specific characteristics? (Please tick)								
Age	**Y** ✓	**N**	**Marriage & civil partnership**	**Y**	**N** ✓	**Religion & belief**	**Y**	**N** ✓
Disability	**Y** ✓	**N**	**Pregnancy & maternity**	**Y**	**N** ✓	**Sex**	**Y**	**N** ✓
Gender reassignment	**Y**	**N** ✓	**Race**	**Y**	**N** ✓	**Sexual orientation**	**Y**	**N** ✓

What evidence do you have to support your findings? (quantitative and qualitative) Please provide additional information that you wish to include as appendices to this document, i.e., graphs, tables, charts		**Consultation/ involvement carried out**	
		Yes	**No**
Age	During the consultation 242 respondents raised the issue of age and disability as factors that would impact their ability to drive further to access any household waste recycling centres.		✓
Disability	During the consultation 242 respondents raised the issue of age and disability as factors that would impact their ability to drive further to access any household waste recycling centres.		✓
Gender reassignment	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓
Marriage & civil partnership	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓
Pregnancy & maternity	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓

EQUALITY IMPACT ASSESSMENT

Race	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓
Religion & belief	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓
Sex	Currently we do not feel that this impacts negatively.		✓
Sexual orientation	The possible closure of some sites does not negatively impact this group, all groups are equally impacted.		✓

Proceed to full impact assessment? (Please tick)	**Yes**	**No** ✓	**Date**
Lead officer sign off		**Date**	
Head of service sign off		**Date**	

If yes, please proceed to Stage 3. If no, please publish the initial screening as part of the suite of documents relating to this issue

EQUALITY IMPACT ASSESSMENT

Stage 3 Identifying impacts and evidence

This section identifies if there are impacts on equality, diversity and cohesion, what evidence there is to support the conclusion and what further action is needed

Protected characteristics	**Is the policy (function etc.…) likely to have an adverse impact on any of the groups?** **Please include evidence (qualitative & quantitative) and consultations** *List what negative impacts were recorded in Stage 1 (Initial Assessment).*	**Are there any positive impacts of the policy (function etc.…) on any of the groups?** **Please include evidence (qualitative & quantitative) and consultations** *List what positive impacts were recorded in **Stage 1** (Initial Assessment).*	**Please rate the impact taking into account any measures already in place to reduce the impacts identified** ***High:*** *Significant potential impact; history of complaints; no mitigating measures in place; need for consultation* ***Medium:*** *Some potential impact; some mitigating measures in place, lack of evidence to show effectiveness of measures* ***Low:*** *Little/no identified impacts; heavily legislation-led; limited public facing aspect*	**Further action (only an outline needs to be included here. A full action plan can be included at Section 4)** *Once you have assessed the impact of a policy/service, it is important to identify options and alternatives to reduce or eliminate any negative impact. Options considered could be adapting the policy or service, changing the way in which it is implemented or introducing balancing measures to reduce any negative impact. When considering each option you should think about how it will reduce any negative impact, how it might impact on other groups and how it might impact on relationships between groups and overall issues around community cohesion. You should clearly demonstrate how you have considered various options and the impact of these. You must have a detailed rationale behind decisions and a justification for those alternatives that have not been accepted.*
Age				
Disability				
Gender reassignment				
Marriage & civil partnership				
Pregnancy and maternity				

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Race				
Religion & belief				
Sex				
Sexual orientation				
Is this change due to be carried out wholly or partly by other providers? If yes, please indicate how you have ensured that the partner organisation complies with equality legislation (e.g. tendering, awards process, contract, monitoring and performance measures)				

Stage 4 Review and Conclusion **ASSESSMENT**

Summary: provide a brief overview including impact, changes, improvement, any gaps in evidence and additional data that is needed			
Specific actions to be taken to reduce, justify or remove any adverse impacts	**How will this be monitored?**	**Officer responsible**	**Target date**
Please provide details and link to full action plan for actions			
When will this assessment be reviewed?			
Are there any additional assessments that need to be undertaken in relation to this assessment?			
Lead officer sign off	A. Dunstone	**Date**	03/02/21
Head of service sign off		**Date**	03/02/21

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Environmental Appraisal of closure of Congleton HWRC

Cheshire East Council

March 2021

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Limitations

This report has been produced by SQ Planning LLP and Resource Futures on behalf of Cheshire East Council. Whilst the authors have taken all due care to interpret and collate the information presented within the report, any third party relying on the results of the analysis shall do so at their own risk and neither Resource Futures, SQ Planning LLP nor Cheshire East Council shall be liable for any loss or damages arising there from.

Executive Summary

Introduction

Resource Futures working with SQ Planning LLP was commissioned by Cheshire East Council (CEC) to undertake an Environmental Appraisal of the potential impacts of the closure of its Household Waste Recycling Centre (HWRC) at Congleton.

Background

In September 2014, CEC produced a Strategic Environmental Assessment (SEA) as part of its Waste Strategy 2030. The SEA assessed the effects of 19 high-level objectives and the waste options contained within the Waste Strategy against 12 key sustainability themes.

The SEA concluded that CEC's Waste Strategy would make a significant positive contribution to sustainable waste management in the Council area because it provided comprehensive and efficient waste management solutions.

For some of the waste options considered, the effects on the environmental and amenity objectives of the SEA were unknown because both the location of the potential new infrastructure and those facilities that would close, were yet to be determined.

This report seeks to review the relevant environmental objectives set out within the SEA Report and provides detailed analysis of the environmental effects associated with the closure of CEC's HWRC located at Congleton.

This assessment should enable CEC to consider the wider sustainability credentials associated with the closure of its existing HWRC at Congleton and its contribution towards the wider delivery of its Waste Strategy.

Impact

This report and environmental assessment found that the majority of the key considerations were unaffected by the proposed closure of the Congleton HWRC. However, it was inevitable that the proposed closure would have some negative impacts that warranted further study and analysis. The table below summarises the findings of the environmental assessment in accordance with the appraisal scoring system contained within the SEA.

Summary of Effect

SEA Objective	Assessment	Impact	Possible Mitigation	Residual Impact
Population & Human Health Material Assets	**Transportation**	Moderate Adverse	Bring sites. The management of fairer access systems.	Minor Adverse
Air Quality Population & Human Health	**Air Quality**	Neutral	N/A	Neutral to Minor Beneficial
Climate Factors	**Climate Change**	Moderate Adverse	Bring sites. Infrastructure Improvements.	Minor Adverse
Population & Human Health	**Amenity**	Neutral	Signage and CCTV.	Neutral
Employment Social Inclusion	**Socio Economic**	Minor Adverse	Redeployment and infrastructure improvements.	Neutral
Population & Human Health Material Assets	**Future Demand & Recycling**	Minor Adverse	Bring sites. The management of fairer access systems. Wider Infrastructure improvements.	Neutral

The table shows that the residual impact of closing the Congleton HWRC is considered to be neutral to moderate adverse, if no mitigation measures are implemented. The table indicates the potential benefits of installing and implementing a range of practical and expedient measures which will reduce the impacts of the closure to **minor beneficial** to **minor adverse**. The adverse impact of the closure focuses on the additional distances that the waste will be transported by residents and the additional carbon that this transportation will generate.

Waste Strategy

The overall impact of the closure must be considered as an integral part of the impacts of the wider Waste Strategy. The **minor adverse** impacts identified by this report will be offset with respect to the following:

- The continued progress of residents to successfully reduce and reuse materials reducing the need to transport them to a HWRC.
- Consideration of onwards travel of the consolidated waste materials from the remaining HWRCs and the economies of scale that bulking of materials generally achieve.
- Optimisation of the existing HWRC sites to ensure they are fully utilised which will avoid increasing the carbon footprint and impacts of local amenity through the provision of a new site.

- The improvement of existing sites leading to an increase in recycling and reuse rates, which would typically have a greater carbon saving than a small additional distance travelled by residents.
- Wider carbon offsetting measures such as the utilisation of hydrogen collection vehicles and Council level carbon offsetting.
- Financial considerations associated with the management and running of the facilities.

Recommendations

This report assesses the worst-case scenario associated with the generation of traffic and usage of the alternate sites after the closure of Congleton. CEC have committed to monitoring the effects of the closure and will investigate the following recommendation measures based on an identified need.

- The provision of signage and CCTV at the Congleton site to deter fly-tipping.
- Investigation into the management of fairer access at the alternate sites such as the extension of opening hours and managed access arrangements.
- The provision of bring sites in locations which are over 8km from a HWRC.
- Investigation into the potential for further upgrades to existing infrastructure.

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1 Introduction

Resource Futures working with SQ Planning LLP has been commissioned by Cheshire East Council (CEC) to undertake an Environmental Appraisal of the potential impacts of the closure of its Household Waste Recycling Centre (HWRC) at Congleton.

1.1 Purpose of this report

In September 2014, CEC produced a Strategic Environmental Assessment (SEA) as part of its Waste Strategy 2030. The SEA assessed the effects of 19 high-level objectives and the waste options contained within the Waste Strategy against 12 key sustainability themes which included:

- Biodiversity, Flora and Fauna.
- Population and Human Health.
- Soil.
- Water.
- Air.
- Climatic Factors.
- Material Assets.
- Cultural Heritage.
- Landscape.
- Employment.
- Deliverability.
- Social Inclusion.

The SEA concluded that CEC's Waste Strategy would make a significant positive contribution to sustainable waste management in the Council area because it provided comprehensive and efficient waste management solutions.

For some of the waste options considered, the effects on the environmental and amenity objectives of the SEA were unknown because the location of the potential new infrastructure and those facilities that may close were yet to be determined.

This report seeks to review the relevant environmental objectives set out within the SEA Report to provide a more detailed analysis of the environmental effects associated with the closure of CEC's HWRC located at Congleton.

This assessment should enable CEC to consider the wider sustainability credentials associated with the closure of its existing HWRC at Congleton and its contribution towards the wider delivery of its Waste Strategy.

1.2 Background Context

CEC has a statutory duty to provide HWRCs free-of-charge and that are reasonably accessible to residents, in a controlled and sustainable manner.

The Council currently operates 8 HWRC's. The sites are managed by ANSA Environmental Services, a company wholly owned by the Council. At each HWRC the site operations are undertaken by HW Martin Ltd and subcontracted Site Managers. The current contract for the delivery of these services ends in 2023.

The current facility in Congleton is on a site that is leased by the Council. The owner of the site has informed the Council that they will not consider a renewal of the lease. The current lease at the site will expire in 2021 and as such the facility will be closed.

Whilst there is an extensive body of work currently being undertaken to prepare for the end of the contract with HW Martin, this assessment considers the environmental impact of the closure of the Congleton site at the end of its lease in 2021.

2 Methodology

This chapter outlines the requirements and general approach followed by this Environmental Appraisal.

2.1 Requirements

The Environmental Assessment of Plans and Programmes Regulations 2004 require a SEA to be carried out when developing strategic 'plans and programmes'. SEA's are mandatory where a plan or programme is required by legislative, regulatory or administrative provisions. Although not required by law, CEC undertook a SEA on the Waste Strategy in line with recommended best practice.

Actions associated with the implementation of a Waste Strategy, be it due to Council decisions or other factors, do not require further assessment under the SEA Regulations.

Notwithstanding this, CEC are committed to assessing the implications of the closure of the HWRC on the environment and local community to inform its wider decision-making process.

The proposal does not include demolition or the development of a new site. An Environmental Impact Assessment (EIA) under the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 is therefore not required.

2.2 Consultation

In preparation for a new HWRC contract, Resource Futures were commissioned to undertake a review of the current service provision within CEC and to make recommendations regarding the provision going forward. This research concluded that it would be possible to reduce the number of HWRC's within the Council area without significantly affecting the ability of CEC to provide the required service level.

In November 2020, CEC's Cabinet considered the findings of this review and agreed that a public consultation on the options for the future pattern of provision for HWRC's should be undertaken.

Residents were consulted on the scenarios identified in the review and asked how they felt about the options being considered and what they considered the impact would be on them. Over 10,200 responses were received. Most residents supported the option to keep the current service provision pattern.

Respondents to the consultation were asked to provide comments that the Council ought to consider as part of statutory service provisions. The top themes emerging from the comments concerned the potential risk of adverse environmental impacts caused by the closure of sites, which may increase the incidence of fly tipping, increased carbon emissions from longer journeys, pollution and congestion from queuing to access the other sites in the area, misuse of kerbside bin collections and reduction in recycling rates. Other concerns included the increased time and cost it would take for individuals, especially those of an older age group and the disabled, to travel to an alternate site. It was also perceived that there would be an increase in demand for HWRC facilities due to new houses being built.

These concerns are addressed within this appraisal.

2.3 Existing Baseline

The Council currently operates 8 HWRC's in Alsager, Bollington, Congleton, Crewe, Knutsford, Macclesfield, Middlewich and Poynton.

The subject of this assessment is:

- **Congleton Household Waste Recycling Centre:** Barn Road, off the A536 Congleton to Macclesfield Rd, CW12 1LJ.

The traffic utilising the Congleton HWRC currently access and exit the site via the A34 Clayton bypass.

2.4 Projected Future Scenario

When the HWRC at Congleton closes, the nearest alternative sites for the great majority of the residents will be:

- **Alsager Household Waste Recycling Centre,** Hassall Road, Alsager ST7 2SJ.
- **Macclesfield Household Waste Recycling Centre,** off the A536 Macclesfield to Congleton Rd, Gawsworth, Macclesfield SK11 9QP.

The locations of these sites are identified in Figure 1 below:

Figure 1:HWRC locations

It is assumed that traffic travelling from Congleton to the alternate facilities would be likely to travel via:

- Alsager: A34 Newcastle Road / Congleton Road North; and

- Macclesfield: A536 Congleton Road.

2.5 Timeframes

The key time frames examined within this environmental appraisal have been sub-divided as follows:

- **Short term**: Comprising temporary arrangements made when the Congleton site has been closed.
- **Long Term**: Comprising the permanent arrangement made when the Congleton site has been closed.

Within these broad timeframes, the impact of the changes can be categorised as being direct or indirect as follows:

- **Direct effects** are those that impact on local residents and local businesses.
- **Indirect effects** are those that impact on the remaining HWRC network or wider area.

2.6 Assessment Structure

The SEA for the CEC Waste Strategy 2030 identified key sustainability themes which are relevant to the delivery of the Waste Strategy.

This Environmental Appraisal has identified those themes of relevance and assesses the impact of the closure of the Congleton site against them.

2.6.1 Specific Assessment Criteria

Table 1 below replicates the SEA topics and objectives as established in Table 3.2 in the SEA Report. Some of the SEA topics fall outside the scope of this appraisal as will be identified and justified in section 2.7 of this report.

The table allocates appropriate assessment criteria based on those assessment criteria set out within the SEA, and the comments raised by members of the public outlined in section 2.2 of this report. The environmental assessment of each criterion is presented and discussed in individual chapters under the relevant headings.

Table 1: SEA Framework adaptation

SEA Topic	SEA Objective	Assessment Criteria to establish if the closure of the HWRC at Congleton will:	Report Chapter No
Biodiversity, Flora and Fauna	To protect and enhance biodiversity, habitats, geo-diversity and important geological features from adverse effects of waste development; with particular care to sites designated internationally, nationally, regionally and locally	- protect or enhance biodiversity? - help protect any species at risk - protect or enhance geo-diversity and geological sites and features - protect or enhance designated sites or species	**Outside the scope of this report**

SEA Topic	SEA Objective	Assessment Criteria to establish if the closure of the HWRC at Congleton will:	Report Chapter No
Population and Human Health	To protect the living conditions and amenities of local residents from adverse effects of waste development, including noise, vibration, dust, odour and traffic effects.	- effect of noise, vibration, dust or odour. - impact on congestion? - impact on time and cost to travel?	**Outside the scope of this report** **3** **(Transport)**
	To minimise adverse effects of waste management activity on human health.	- impact on air quality?	**4** **(Air Quality)**
	To protect community safety and well-being.	- impact on fly tipping? - impact on litter?	**6** **(Amenity)**
	To avoid adverse cumulative environmental effects of waste management and associated development on local communities.	- impact on future demand in particular from new housing?	**8** **(Future demand & Recycling)** **Cumulative impacts addressed in all chapters**
Soil	To protect agricultural resources from waste management activities.	- seek the protection or enhanced use of the best quality agricultural land?	**Outside the scope of this report**
Water	To protect water quality, quantity and manage flood risk in relation to waste management activities within the Council area.	- seek the protection of water quality and manage flood risk?	**Outside the scope of this report**
Air	To minimise adverse effects of waste management activity on air quality.	- impact on air quality & pollution?	**4** **(Air Quality)**
Climatic Factors	To minimise the effect of waste management on climate change	- reduce emissions of greenhouse gases, in particular carbon dioxide and methane?	**5** **(Climate Change)**
Material Assets	To reduce the consumption and wasteful use of primary resources and encourage the development of alternatives to primary resources.	- impact on kerbside collections?	**8** **(Future Demand & Recycling)**

SEA Topic	SEA Objective	Assessment Criteria to establish if the closure of the HWRC at Congleton will:	Report Chapter No
	To minimise the requirement for energy use and increase the use of energy from renewable sources.	- encourage the efficient use of energy? - result in energy efficient development? - result in the high-quality design and layout of development? - promote and encourage the use of renewable energy? - incorporate renewable energy technologies?	**Outside the scope of this report**
	To secure the sustainable management of waste, minimise its production, and increase re-use, recycling and recovery rates.	- impact on recycling rates?	**8 (Future Demand & Recycling)**
	To minimise the transport effects of waste management activity.	- maintain or enhance necessary transport infrastructure?	**3 (Transport)**
Cultural Heritage	To minimise the effects of waste management on places, features and buildings of historic, cultural and archaeological importance.	- protect or enhance the area's internationally, nationally, or locally designated heritage and asses their setting?	**Outside the scope of this report**
Landscape	To protect the quality, integrity and distinctiveness of the landscape and townscapes from waste management activity, including historic landscapes of cultural significance.	- protect or enhance the landscape? Will it protect or enhance the townscape? - protect or enhance the existing built and natural environment, ensuring that the area remains distinctive?	**Outside the scope of this report**
Employment	To provide employment opportunities and promote economic wellbeing through waste management activities.	- increase access to jobs and employment opportunities?	**7 (Socio Economic)**

SEA Topic	SEA Objective	Assessment Criteria to establish if the closure of the HWRC at Congleton will:	Report Chapter No
Deliverability	To provide reliability, deliverability and operational flexibility in waste management solutions.	- positively contribute to the maintenance of reliable waste management solutions - positively contribute to the delivery of waste management solutions - positively contribute to the maintenance of the operational flexibility of waste management solutions?	**Outside the scope of this report**
Social Inclusion	To enhance opportunities for public involvement, education and engagement in waste management.	- increase access to education and training opportunities?	**Outside the scope of this report**
	To promote social inclusion in waste management activities.	- impact on vulnerable or older age groups?	**7 (Socio Economic)**

2.6.2 Combined Effects

Whilst individual environmental impacts have been considered in individual chapters of this report, there is the potential for environmental subject areas to impact upon others. The potential combined effects are addressed in each of the respective chapters within this report, where relevant.

2.6.3 Cumulative Effects

Cumulative effects are those that may interact in an additive or subtractive manner with potential impacts of HWRC's within the network. Such cumulative effects have been addressed in each of the respective chapters within this report, where relevant.

2.6.4 Mitigation of Effects

Where appropriate, potential mitigation measures are suggested to limit or to offset any potential adverse impacts of the closure of the HWRC at Congleton.

2.6.5 Residual Effects

Residual effects are any effects which are likely to remain after mitigation measures have been applied.

2.6.6 Appraisal Scoring System

The appraisal scoring system used in the SEA has been utilised to determine the level of significance that the closure of the Congleton site may have on the identified sustainability objectives. The appraisal scoring system is provided in Table 2 (slight amendments have been made to the definition of the scoring system to provide effective application within this assessment).

Table 2: Appraisal Scoring System

Rating	Meaning	Explanation
++	Moderate beneficial effect	The closure will have a significant positive effect on the achievement of the objective
+	Minor beneficial effect	The closure will have a positive effect on the achievement of the objective.
0	Neutral effect	The closure will have no impact on the achievement of the objective.
-	Minor adverse effect	The closure will have a negative impact on the achievement of the objective.
--	Moderate adverse effect	The closure will have a significant negative impact on the achievement of the objective.
?	Unknown / dependent upon implementation	The impact of the closure on the achievement of the objective is unknown.

2.7 Topics that are outside the scope of this environmental assessment

The closure of the existing HWRC at Congleton does not involve the demolition or the movement of existing site infrastructure to a new location.

The following topics have, therefore, been 'scoped out' of this Environmental Appraisal.

- **Biodiversity, Flora and Fauna**: The proposal does not involve demolition or construction work which could have the potential to impact on ecological assets.
- **Noise, Vibration, Dust**: The proposal does not involve demolition or construction work, however, the removal of skip loading/unloading at the site may have a moderate beneficial impact on the local environment.
- **Odour**: The site does not process odorous materials and as such its closure will not have an impact on odour.
- **Soil**: The proposal does not involve demolition or construction work.
- **Water**: The proposal does not involve demolition or construction work.
- **Energy**: The proposal does not involve renewable energy or an energy intensive use.
- **Cultural Heritage**: The proposal does not involve demolition or construction work.
- **Landscape:** The proposal does not involve demolition or construction work; however, the removal of the site may have a moderate beneficial impact on the visual amenity of the area.
- **Deliverability**: This has been assessed as part of other studies commissioned by CEC.
- **Education**: A HWRC can have a beneficial impact on the education of members of the public regarding recycling and waste. The closure of one such facility will not have an impact on the wider education role which HWRC's provide.

2.8 Limitations

Technical difficulties encountered and limitations of the study include:

- Traffic survey data are based on a postcode search and does not allow for user preferences.
- Travel times do not account for congestion.
- Traffic data is based on a worst-case scenario and does not allow for residents' behavioural changes resulting from the closure.
- The assessment of air quality and carbon production does not account for congestion.
- Business users are not considered as part of this assessment.
- This assessment does not include an assessment of effects on the Waste Strategy and associated SEA.

3 Transport

3.1 Introduction

This chapter assesses the potential impact of the closure of Congleton HWRC on traffic and transportation.

3.2 Aims and Objectives

Its aims and objectives are to determine the impact of the closure on distance and travel times.

3.3 Methodology

This assessment has been based on data generated from distances of residential postcodes to their nearest HWRC's.

The assessment of significance has been derived from The Waste and Resources Action Partnership (WRAP) published HWRC Guide (2012). The guidance recommended that the distribution of HWRCs should enable driving times to be up to 20 mins for the great majority of households in good traffic conditions. Travel times might be up to about 30 minutes in very rural areas.

3.4 Baseline assessment

As indicated within the limitations section of this report, limited real time traffic data is available. The data below is based on a postcode survey which distributes potential usage according to proximity to the nearest HWRC in travel time.

The number of households which potentially utilise each of the HWRC sites at the current time within the CEC area are shown in Table 3 below.

Table 3: Household usage per site

Site	Current Number of households and % (approx.)
Alsager	21,756
	12%
Bollington	17,944
	9%
Congleton	17,761
	9%
Crewe	59,678
	32%
Knutsford	21,609
	11%
Macclesfield	23,692
	13%
Middlewich	14,349
	8%
Poynton	12,300
	7%

The current distances travelled by users of HWRCs in the Council area are shown in Table 4 below:

Table 4: Distance travelled (proportion of households)

	Less than 2 km	2 to 4 km	4 to 6 km	6 to 8 km	More than 8 km
No	28,448	59,858	29,196	26,257	45,330
%	15%	32%	15%	14%	24%

The current time taken to travel by users of HWRCs in the Council area set out in Table 5 below:

Table 5: Time travelled (proportion of households)

	Less than 5 minutes	5 to 10 minutes	10 to 15 minutes	15 to 20 minutes	More than 20 minutes
No	41,511	78,480	52,241	12,499	4,358
% (approx.)	22%	42%	28%	7%	2%

In addition to the public usage at the Congleton site, it also receives 13 service vehicles per week which averages at approximately 2 per day.

The data indicates that the local road network often becomes congested during peak times around the site in late morning and early afternoon.

3.5 Timeframe

The closure of the Congleton HWRC is to be permanent and the effects, therefore, will extend over the long-term.

The effects will be of both a direct and indirect nature, affecting both the existing site area and alternate HWRC sites.

3.6 Assessment of effect

The environmental impact of the Congleton closure is likely to re-distributed trips to either to Alsager or Macclesfield as these are the closest. Whilst it is likely that the number of overall trips will reduce because of the closure, with residents making fewer trips with a larger quantity of material, this assessment is based on the worst-case scenario of a complete re-distribution of trips on the network.

The assumed redistribution of trips based on travel time is shown in Table 6:

Table 6: Assumed trip redistribution (per no of households)

Site	Current	After Site Closure
Alsager	21,756	24,173
	12%	13%
Bollington	17,944	17,939
	9%	9%
Congleton	17,761	
	9%	
Crewe	59,678	59,678
	32%	32%
Knutsford	21,609	21,609
	11%	11%
Macclesfield	23,692	38,698
	13%	20%
Middlewich	14,349	14,693
	8%	8%
Poynton	12,300	12,300
	7%	7%

The impact on both distance and time travelled on users of the wider HWRC network with the closure of the Congleton HWRC is provided in Tables 7 and 8 below.

Table 7: Impact of closure on distance travelled (proportion of households)

	Less than 2 km	2 to 4 km	4 to 6 km	6 to 8 km	More than 8 km
No	22,262	51,240	28,452	25,915	61,220
%	12%	27%	15%	14%	32%

Table 8: Impact of closure on time travelled (proportion of households)

	Less than 5 minutes	5 to 10 minutes	10 to 15 minutes	15 to 20 minutes	More than 20 minutes
No	33,958	70,827	62,754	17,171	4,379
% (approx.)	18%	37%	33%	9%	2%

The data indicates that there is a fall in the number of people travelling in all categories under 8km, with a 35% increase in the number of households required to travel more than 8km when the Congleton HWRC closes. This equates to a **moderate adverse impact** on residents in distance travelled.

However, when assessed against time travelled, the data show that:

- There is an 18% fall in the number of people who might travel for less than 5 minutes.
- There is a 10% fall in the number of people who might travel between 5 to 10 minutes.
- There is an increase of 20% in the number of people who might travel between 10 to 15 minutes.
- There is an increase of 37% in the number of people who might travel between 15 to 20 minutes.
- There is no change to those households who might travel over 20 minutes.

This analysis therefore suggests that because of the closure of Congleton most people will travel between 5 and 10 minutes longer to reach a HWRC, with no increase in the numbers of residents who might travel over 20 minutes to reach a facility.

In accordance with the WRAP HWRC Guidance published in 2012, this equates to a **neutral impact** on time travelled to a HWRC within the Council area. However, it is recognised that the additional time would be considered to have **a minor adverse impact** on users of the services.

The closure of the HWRC at Congleton should have a **moderate beneficial impact** on road congestion and the number of HGV/Roll on Roll off (RORO) vehicles operating in the local area.

3.7 Assessment of combined and cumulative effects

The cumulative effects of the proposal include the wider impacts on the alternate HWRCs in particular Alsager and Macclesfield. Without mitigation measures, the closure could increase the potential for congestion at these sites having a **moderate adverse effect**.

Although the assessment has assumed that an equal amount of waste that is disposed currently at the Congleton site will be transferred to the facilities at Alsager and Macclesfield, it is considered that the number of service vehicles travelling may not increase relatively due to the potential to achieve economies of scale at Alsager and Macclesfield. It is concluded, therefore, that the cumulative effects of service vehicles at the alternative sites could have a **minor beneficial impact** through the reduction of these vehicles on the local road network.

The combined effects of traffic on air quality are considered in chapter 4 of this report.

3.8 Mitigation measures

Future improvements to waste management infrastructure and continued improvements in reuse has the potential to reduce the need to travel to HWRCs.

In addition, the possibility of additional bring sites should be investigated in locations which are over 8km from a HWRC. These measures may reduce the total travel time and distance travelled by residents to **minor adverse** if the overall number of trips is reduced.

To mitigate potential queuing traffic and congestion at other HWRC sites, fairer access management should be investigated, this could include the extension of opening times of Alsager and Macclesfield and a number plate access option (amongst others). These measures may reduce the cumulative impact of the scheme to **neutral**.

3.9 Residual Impacts

A summary of residual effects is provided in Table 9 below:

Table 9: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Travel Distance	Direct	Permanent	Moderate Adverse	Bring sites	Minor Adverse
Travel Time	Direct	Permanent	Minor Adverse	Bring sites	Minor Adverse
Congestion	Indirect	Permanent	Moderate Beneficial	n/a	Moderate Beneficial
Service Vehicles	Direct	Permanent	Minor Beneficial	n/a	Minor Beneficial
Cumulative Impact	Indirect	Permanent	Moderate Adverse	Fairer access management systems	Neutral
Overall	Direct	Permanent	Moderate Adverse	As above	Minor Adverse

4 Air Quality

4.1 Introduction

This chapter assesses the potential impact of the closure of Congleton HWRC on local air quality and pollution.

4.2 Aims and Objectives

The aim of this assessment is to review the impact of the closure on local air quality and air pollution through the consideration of traffic routing and the associated impacts on Air Quality Management Areas (AQMA).

4.3 Methodology

CEC have published a list which represents a non-exhaustive indication of when an Air Quality Impact Assessment may be required.

1. Any development within an AQMA, or within 500m of existing Air Quality Management Areas
2. food retail development >0.2HA (1000m_2 gross floor space)
3. office development >0.8Ha (2500m_2 gross floor space)
4. housing development >1.0 Ha or >80 units
5. development likely to lead to an increase of >60 vehicle movements per hour
6. development likely to result in increased traffic, congestion, or changes to vehicle speeds (new junctions, roundabouts etc)
7. development likely to significantly change the traffic composition
8. development significantly increasing car parking provision (>300 spaces or 25% increase)
9. development in close proximity (<100m) to busy roads / junctions
10. development likely to result in a significant change in air quality, or development of residential properties in an area of already poor air quality
11. poultry establishments > 400,000 birds (mechanical ventilation) or 200,000 (natural ventilation) or > 100,00 (Turkeys) and with relevant exposure within 100m of the unit; and,
12. biomass / CHP / Industrial Installation (see guidance under the biomass and clean air act pages).

In accordance with points 1 and 7 above, this assessment considers the re-routing of traffic caused by the closure and investigates how these routes impact on local AQMAs.

4.4 Baseline assessment

The Cheshire East Council Annual Status Report 2020 (June 2020) provides details of all the air quality management areas (AQMAs) within its administrative area. The three locations of interest are considered below.

- **Congleton**: There are 3 AQMAs with the potential to be affected by existing and future traffic movements associated with the Congleton HWRC.
- **Alsager**: There are no AQMAs located in Alsager.
- **Macclesfield**: There are no AQMAs located between Congleton and the Macclesfield Household Waste Recycling Centre.

The locations of the Congleton AQMAs are presented in Figure 2 below.

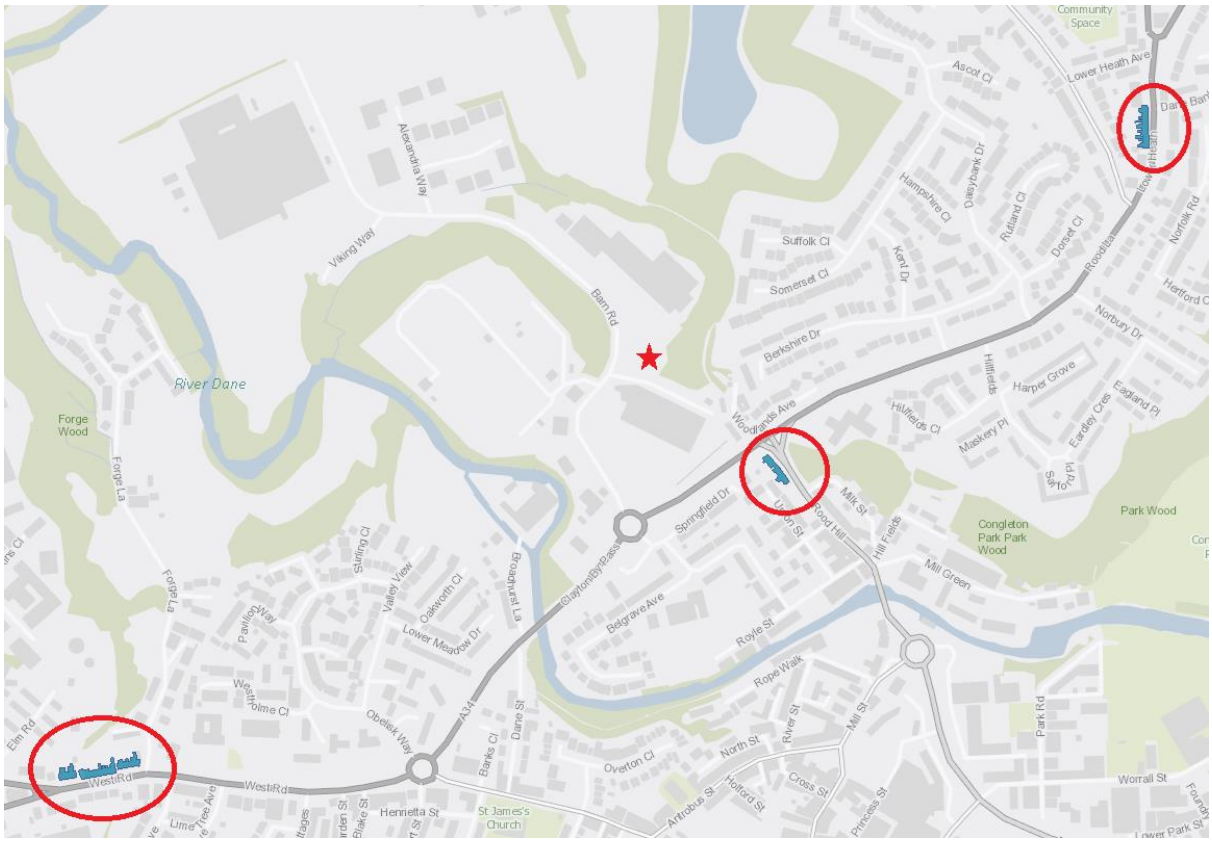

Figure 2:Congleton AQMA

The plan shows that the existing Congleton HWRC is not located within any of the AQMA's however traffic using the facility which travel along the A34 / A54 does have the potential to travel through them.

Cheshire East Council monitors levels of Nitrogen dioxide (NO_2) within its administrative area, including within the 3 Congleton AQMAs. The Council ASR 2020 shows the following monitoring locations within the Lower Heath AQMA.

Figure 3:Lower Heath AQMA monitoring locations.

The 2019 monitoring results for these locations are as follows:

- CE115 1 Lower Heath: 22.33 µg/m^3
- CE114 28 Lower Heath: 47.44 µg/m^3
- CE110 Lights outside 99 Lower Heath: 28.05 µg/m^3.

Of these monitoring locations, only the CE114 28 Lower Heath result is above the annual average limit of 40.0 µg/m^3.

The Council ASR 2020 shows the following monitoring locations within the Rood Hill AQMA:

Figure 4:Rood Hill AQMA monitoring locations

The 2019 monitoring results for these locations are as follows:

- CE116 68 Rood Hill: 33.42 µg/m^3
- CE117 Rood Hill takeaway 62/64: 35.92 µg/m^3.

Of these monitoring locations, neither result is above the annual average limit if 40.0 µg/m3.

The Council ASR 2020 shows the following monitoring locations within the West Road AQMA:

Figure 5: West Road AQMA Monitoring locations

The 2019 monitoring results for these locations are as follows:

- CE105 35 West Road: 25.31 µg/m^3
- CE104 13 West Road: 43.59 µg/m^3.

Of these monitoring locations, only the CE104 13 West Road result is above the annual average limit if 40.0 µg/m^3.

4.5 Timeframe

The closure of the Congleton HWRC is to be permanent and the effects, therefore, will extend over the long-term.

The impacts associated with air quality are considered to be indirect as they relate to emissions generated by users and not activities on the site itself.

4.6 Assessment of effect

As stated earlier within this chapter, the impact of the closure of the Congleton HWRC on air quality is linked to traffic and their associated flows.

The Congleton HWRC serves approximately 17,761 households. Traffic flow data shows that the Annual Average Daily traffic (AADT) for the 3 HWRCs is currently as follows:

- Alsager: 289
- Congleton: 243; and
- Macclesfield: 406.

As would be expected the peak flows coincide with weekends when users have the time to visit the HWRC. Closing the Congleton HWRC would therefore immediately remove 243 AADT trips from the network in the immediate vicinity of the HWRC.

Detailed trip routing is currently not available however it is considered that the most likely options for the resulting displacement are:

1. A proportion of traffic from West Heath which currently travels to the Congleton HWRC would continue to pass through the West Road AQMA and would now pass-through Congleton through the Lower Heath AQMA.
2. A proportion of traffic from West Heath which currently travels to the Congleton HWRC would now use the Alsager HWRC. All existing flows would cease to pass through the West Road AQMA.
3. Traffic accessing the Congleton HWRC from the A54 Rood Hill (from Congleton Centre) would continue to do this, however traffic would then pass through either the West Road AQMA if visiting the Alsager HWRC or Lower Heath AQMA if visiting the Macclesfield AQMA.
4. Traffic from Eaton would use the Macclesfield HWRC and would not pass through the Lower Heath AQMA.
5. Traffic from Lower Heath would use the Macclesfield HWRC and would not pass through the Lower Heath AQMA.

The total AADT using the Congleton HWRC is 243 and it is assumed that all of these trips would be distributed across the network (as the worst-case scenario), particularly the A34 and A54 to the south, north and east of the HWRC. This assessment has therefore assumed that the number of vehicles on the network would not materially change, however there is likely to be a redistribution.

For the users who are to the south and north of Congleton, the diversion to the Alsager and Macclesfield HWRCs respectively may result in a **minor beneficial impact** (i.e. reduction in traffic through the 2 AQMAs at Lower Heath and West Road respectively). For the users in Congleton, there is expected to be no change in numbers through the Rood Hill AQMA, however these would now travel north or south on the A34 through the Lower Heath and West Road AQMAs. As such this may result in a **minor adverse impact**.

In overall terms, based on the information available, it is considered unlikely that there will be any material difference in the concentration of traffic pollution (nitrogen dioxide) in the AQMAs as a result of this traffic redistribution. It is therefore concluded that the closure would have a **neutral effect** on local air quality.

As a result of the closure of the HWRC, 2 HGV collections per day would no longer be required. Whilst in theory these movements will take place elsewhere, as material is diverted by residents to other sites, it is considered that economies of scale would be achieved through bulking up of material into larger vehicles for collection from these sites, and as such there would be a **minor beneficial impact** associated with the closure of the facility.

4.7 Assessment of combined and cumulative effects

There should be no cumulative effect because the closure of a site will not generate additional vehicle movements on the local road network.

4.8 Mitigation measures

The proposed development will not result in any adverse impact on local air quality and as such no mitigation measures are proposed.

4.9 Residual Impacts

A summary of residual effects is provided in table 10 below.

Table 10: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Impact on AQMA	Indirect	Permanent	Neutral	N/A	Neutral to minor beneficial

5 Climate Change

5.1 Introduction

The Intergovernmental Panel on Climate Change (IPCC) is the United Nations body for assessing the science related to climate change. They provide regular assessments of the scientific basis of climate change, its impact and future risks, and options for adaption and mitigation.

The IPCC has published five comprehensive assessment reports reviewing the latest climate science, along with several special reports on specific topics. The Fifth Assessment Report (AR5) is the latest key report, finalised in 2014. These reports recognise that reduction in carbon emissions is key to reducing climate change.

This chapter assesses the closure of the facility on carbon emissions and as such its impact on climate change.

5.2 Aims and Objectives

The scope of the assessment is primarily focused on carbon dioxide (CO_2) emissions associated with transport, specifically the consideration of increases (or decreases) in distances that local residents are required to travel in order to access their closest HWRC, and the resultant changes in carbon dioxide emissions.

Changes in frequencies/patterns of waste collection vehicles removing material from the HWRC is also briefly considered.

The effect that the closure of the HWRC will have on recycling rates and/or the volume of material collected by the system, and the carbon implications of those effects, is not considered. It is assumed that the waste will be diverted to other facilities in similar volumes and that onward processing continues with the same technologies or methods.

5.3 Methodology

For the purposes of this assessment, traffic data and analysis has been utilised. The information includes postcodes for all residents for whom the Congleton facility is their closest HWRC. Distances from these postcodes to the HWRC is provided in km.

The assessment has assumed a complete re-distribution of trips across the network as a worst case, in reality (prior to any mitigation measures being employed) the number of trips is likely to reduce with residents making fewer trips but with larger quantities of materials.

From this information, the additional distance each resident would theoretically be required to travel to access their closest HWRC can be calculated. Based on the average number of daily and weekly visits by local residents to the HWRC an estimate can be made as to the additional distance in km that residents will be required to travel as a result of the closure.

This assessment has utilised available figures for the average carbon emissions per km from road vehicles registered in the UK. The carbon intensity per km of road vehicles has been falling significantly over the last 20 years and the most recent data (second quarter of 2015 - April to June) puts the average carbon dioxide

emissions of cars at 122.1 grams of carbon dioxide per kilometre. Given the number of electric vehicles now on the road in the UK, alongside numerous older, more carbon intensive vehicles, the figure above is considered reasonably accurate for the purposes of this assessment.

Figures are also available for a range of heavy goods vehicles. For the purposes of this assessment, waste collection vehicles have been assumed to comprise 14-20 tonne rigid HGVs at Euro VI standard. The average carbon dioxide emissions of these vehicles is 540gCO_2/km.

Based on the parameters above, estimates are made of the annual CO_2 changes as a result of the closure of the HWRC.

There is no established threshold for assessing the significance of individual project's contributions to climate change. However, IEMA guidance on considering Greenhouse Gas (GHG) Emissions within EIAs states that *'…it might be considered that all GHG emissions are significant and an EIA should ensure the project addresses their occurrence by taking mitigation action…'*.

Appendix C of the above guidance states that '*When evaluating significance, all new GHG emissions contribute to a significant negative environmental effect; however, some projects will replace existing development that have higher GHG profiles. The significance of a project's emissions should therefore be based on its net impact, which may be positive or negative. Where GHG emissions cannot be avoided, the EIA should aim to reduce the residual significance of a project's emissions at all stages. Where GHG emissions remain significant but cannot be further reduced… approaches to compensate the project's remaining emissions should be considered.'*

5.4 Baseline assessment

Based on the six-week reporting period there was an average of 243 visits to Congleton HWRC per day. Whilst it was generally higher at the weekend and on specific weekdays, this figure is considered the most suitable to consider annual carbon emissions contributions. Based on the facility being open for 365 days a year, this equates to 88,695 visits.

The average distance that local residents (for whom the Congleton site is their closest HWRC) are required to travel is 3.2 km. This would mean a 6.4km round trip on average for each visit. Based on the annual number of visits above, this equates to 567,848km travelled per annum by local residents to and from the HWRC.

Assuming that residents are travelling in the average modern passenger car, 122.1gCO_2 would be emitted for every km driven, equating to an annual contribution of 69,309,820g CO_2, or 69.3 tonnes a year.

5.5 Timescales

The closure of the Congleton HWRC is to be indirect and permanent extending over the long-term.

5.6 Assessment of effect

The most significant potential for effects on climate change from the closure of Congleton HWRC are from changing journey distances, as local residents are required to travel further to an alternative HWRC. The average distance for local residents to their next closest HWRC is 10.9km, which equates to an average increase in journey distance of 7.7km for each resident.

Based on the annual total trips of 88,695 and an average round trip of 15.4km, this equates to an additional 1,365,903 km driven per annum by local residents. Using the figure above of 122.1gCO_2/km this equates to approximately 166.7 tonnes CO_2 per annum.

As a result of the closure of the HWRC, 2 HGV collections per day would no longer be required. Whilst in theory these movements will take place elsewhere, as material is diverted by residents to other sites, it is considered that economies of scale would be achieved through bulking up of material into larger vehicles for collection from these sites, and as such there would be some CO_2 savings. Based on an assumed round trip for waste collection vehicles of 20km this saving equates to 7.88 tonnes (540g CO_2/km x (365 x 2 x 20)).

This gives a net CO_2 increase of 158.8 tonnes per annum.

Overall, the development will have a **moderate adverse effect** as it will result in higher carbon emissions associated with transport emissions than if the HWRC remained open.

5.7 Assessment of combined and cumulative effects

Climate Change is a global concern and as such the cumulative effects of the scheme have been considered as part of the assessment above.

5.8 Mitigation measures

Further consideration into improvements to existing waste management sites and possibilities of introducing bring sites in areas which are in locations of 8km or more is further assessed in chapter 8 of this report. This may reduce the number of trips that residents require to take and will therefore reduce the trip rates and with it, carbon emissions.

This will reduce the impact on climate change to **minor adverse**.

5.9 Residual Impacts

A summary of residual effects is provided in Table 11 below.

Table 11: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Climate Change	Indirect	Permanent	Moderate Adverse	Provision of bring sites. Infrastructure Improvements.	Minor Adverse

6 Amenity

6.1 Introduction

This chapter considers the potential for the closure of the facility to cause environmental nuisance.

6.2 Aims and Objectives

This assessment will review the impacts of the closure on noise, fly tipping and litter.

6.3 Methodology

There is no specific methodology set down to determine the amenity value of a HWRC. This chapter identifies the potential impacts of the closure of the HWRC on the local communities at and around the existing site and determines the significance of any impact on local receptors.

6.4 Baseline assessment

Due to effective on-site management, the area is not subject to a high or significant proportion of fly tipping, littering and vermin.

The material deposited at the site is not odorous and the area has not been subject to complaints about unpleasant smells and noxious odours.

The operation of the site causes noise at times, which is associated with depositing material into the skips and vehicles entering and moving around the site. Noise is also generated from the service vehicles and the associated changeover of RORO (roll on – roll off) containers.

6.5 Timescales

It is anticipated that there could be some short-term, temporary effects following the closure of Congleton's HWRC if members of the public are not prepared to drive to the alternative facilities at Alsager and Macclesfield.

Over the long term, any temporary effects will be mitigated by custom and practice of using the alternative sites and there should be no permanent effects subject to any proposed re-use of use of the site by the leaseholder and approval by CEC.

6.6 Assessment of effect

The removal of the site will remove the existing noise source which will result in a **minor beneficial effect** on the local area.

There is no evidence to suggest that the closure of a household waste recycling centre leads to an increase in litter and fly-tipping. A **minor adverse effect** has been assumed in the short term if members of the public drive to Congleton find the site closed, fly tipping instead of travelling to an alternate site.

6.7 Assessment of combined and cumulative effects

The impacts associated with litter and fly tipping are associated with the immediate area and as such wider impacts on the remaining HWRC network is not considered likely.

The redistribution of traffic will have a combined impact on amenity. The impacts of the closure of traffic are considered in chapters 3 and 4 of this report.

6.8 Mitigation measures

It is recommended that signage of the closure, location of alternative facility and information on penalties for unlawful entry onto the site is erected at the site gates.

It would be prudent to install CCTV at the site entrance to deter potential fly tippers in the short term. These measures will reduce the impact to **neutral**.

6.9 Residual Impacts

A summary of residual effects is provided in Table 12 below.

Table 12: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Noise	Direct	Permanent	Minor Beneficial	N/A	Minor Beneficial
Fly tipping and litter	Indirect	Temporary	Minor Adverse	Signage & CCTV	Neutral
Overall	Both	Both	Neutral	As above	Neutral

7 Socio Economic

7.1 Introduction

This chapter assesses the potential impact of the closure of the Congleton HWRC on socio-economic factors.

7.2 Aims and Objectives

This assessment will review the impacts of the closure of the HWRC on local employment opportunities and on vulnerable or older age groups who have made use of the existing site.

7.3 Methodology

There is currently no formal guidance or regulation setting out the preferred method or content for an assessment of potential economic and social impacts. This chapter identifies the potential impacts on socio-economic factors and determines the significance of this impact on local receptors.

7.4 Baseline assessment

The existing site currently consists of 6 central skips with a number of smaller collection units. The site employs 4 members of staff at any one time. Staff work in shifts, 2x5 day shifts, 1x3 day shift and 1x1 day shift.

In addition, the site employs one service vehicle driver, who is part of a wider fleet that service the wider HWRC network.

7.5 Nature of effect

Due to the closure of the Congleton HWRC any effects are direct, long term and permanent.

7.6 Assessment of effect

The closure of the Congleton HWRC will not impact on employees associated with the service vehicles (or wider management) as they will still be required to service the remaining HWRC network.

However, the site closure will necessitate the loss of 4 jobs which is considered to give rise to a **moderate adverse impact**.

The existing site is not considered to be user friendly for residents who are vulnerable or elderly, requiring a member of the public to transfer materials into their car, drive, unload and return home. Owing to the constraints of the site, it was not feasible to improve the working arrangements at the site significantly within the operational service life of the facility.

As identified in Chapter 3, the impacts of the proposal will result in an additional drive time of approximately 5 to 10 minutes from many locations. This is considered not to introduce an impediment to users of the site who already drive and load/unload their vehicles. The closure is therefore considered to have a **neutral** impact on these users of the HWRC.

7.7 Assessment of combined and cumulative effects

Cumulative or combined effects on the wider HWRC network are considered unlikely.

7.8 Mitigation measures

Opportunities for redeployment of staff members should be identified, possible extension to opening hours at Alsager and Macclesfield (as recommended in Chapter 3) and a possible re-use shop at Macclesfield may provide opportunities. Should redeployment be achieved, this will lead to a **minor adverse** to **neutral impact** on jobs and the local economy.

Further consideration into the possibilities of future infrastructure improvements and for bring sites in areas which are in locations of 8km or more from a HWRC site are further assessed in chapter 8 of this report. This may reduce the need to utilise the HWRC sites for vulnerable and older age groups leading to a **minor beneficial impact** for these groups of residents.

7.9 Residual Impacts

A summary of residual effects is provided in Table 13 below:

Table 13: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Employment	Direct	Permanent	Moderate Adverse	Redeployment.	Minor Adverse to Neutral
Vulnerable and elderly groups	Direct	Permanent	Neutral	Bring sites. Infrastructure improvements.	Minor Beneficial
Overall	Direct	Permanent	Minor Adverse	As above	Neutral

8 Future Demand & Recycling

8.1 Introduction

This chapter assesses the potential impact of the closure of the Congleton HWRC on recycling and future demand for HWRC sites generated by new developments in the area.

8.2 Aims and Objectives

The assessment of future demand and the impact on the Waste Management Strategy is subject to assessment as part of CEC assessment of the wider HWRC provision. This is outside the remit of this report.

This chapter focuses on the prime concerns expressed by members of the public as part of the consultation procedure undertaken by CEC in the last quarter of 2020. Those were that:

1. The closure would increase the risk of the misuse of kerbside collections.
2. The closure would have an adverse impact on recycling rates.
3. The impact of future housing/commercial growth ought to be investigated.

8.3 Methodology

There is currently no formal guidance or regulation setting out the preferred method or content for an assessment of this nature. This chapter reviews the amount and type of waste received at the Congleton site, identifies where this waste is likely to be redirected and qualitatively assesses the impact of this and any projected future growth.

8.4 Baseline assessment

The latest data (2019 to 2020) on tonnages received and managed by the Congleton HWRC is provided in the Table 14 below:

Table 14: Tonnages received at Congleton HWRC in 2019 to 2020

Waste Type	Tonnages	Percentage
Disposal (tonnes):		
Civic Amenity Waste to Energy	658.19	23.61
Civic Amenity Waste to Landfill	238.69	8.56
Green Waste (tonnes):		
Green Waste for composting	438.70	15.74%
Inert (tonnes):		
Hardcore	99.84	3.58%
Recyclables (tonnes):		
Batteries - Automotive	6.07	0.22%
Batteries - Domestic	1.52	0.05%
Hard Plastic	-	
Card	123.72	4.44%

Waste Type	Tonnages	Percentage
Chipboard or Mixed Wood/Chipboard	287.15	10.30%
Ferrous Metal	153.93	5.52%
Non-Ferrous Metal	93.96	3.37%
Glass	17.33	0.62%
Cooking Oil	0.62	0.02%
Engine Oil	5.22	0.19%
Paper	47.34	1.70%
Plastic Bottles	2.13	0.08%
Wood	246.07	8.83%
Textiles	63.40	2.27%
Waste Paint / Chemicals - Recycled	0.99	0.04%
Fridges & Freezers	32.74	1.17%
Small WEEE (SDA)	92.86	3.33%
Large WEEE (LDA)	32.68	1.17%
TVs/CRTs	28.98	1.04%
Tubes	0.27	0.01%
Reuse (tonnes):		
Bric-a-Brac (Re-use)	115.16	4.13%
Total	2787.57	100%

The waste types which made up the majority of waste at the HWRC during 2019 to 2020 included:

- 32.17% of waste taken to the Congleton HWRC is taken for final disposal (or energy recovery).
- 15.74% of waste is green waste for composting.
- 10.30% of waste is made up of Chipboard or mixed wood/chipboard.
- 8.83% is made up of wood.

8.5 Timescales

Due to the closure of the Congleton HWRC any effects will be direct, long term and permanent.

8.6 Assessment of effect

As identified in section 8.4, the largest proportion of materials taken to the HWRC at Congleton includes residual waste, wood waste and garden waste. Due to the bulky nature of these materials, and the provision of green waste doorstep services by CEC during summer months, the closure of the Congleton HWRC is unlikely to result in these materials being disposed of as part of the residual 'black bag' waste by the residents in significant quantities.

With regards to smaller items such as metals, glass, textiles, it is possible that these may be disposed of within black bags/bins for collection. However, these materials can be disposed of locally within existing bring sites which includes glass and textiles.

With regards to electrical items and bric-a-brac, charity shops and the proposed re-use centre at Macclesfield will provide a more sustainable solution to managing this type of waste and increase re-use in line with the waste hierarchy. This will offer an improvement on the current services.

It can therefore be concluded that the closure of the facility may result in a **minor adverse effect** at worst on recycling rates should residents add one or two items to the residual waste bin from time to time.

For new developments, the Cheshire East Local Plan Strategy adopted in 2017 and the validation checklist (for housing over 50 units) requires that all developments must consider sustainable waste management methods (such as internal and external storage) as an integral feature in design. Consideration of the impact of the waste generated from the proposals should be considered at the planning stage and planned for as part of CEC's wider waste management strategy.

As referred to previously, the Waste and Resources Action Partnership (WRAP) published HWRC Guide (2012) recommended that distribution of centres should enable driving times to HWRCs to be up to 20 minutes for the great majority of households in good traffic conditions and 30 minutes in very rural areas). As identified in Chapter 3, the remaining HWRC centres provide this coverage which allows the waste authority to ensure that all new developments are serviced in accordance with guidelines.

It is concluded, therefore, that the proposed closure would have **a neutral impact** on future demand.

8.7 Assessment of combined and cumulative effects

The closure of the HWRC is likely to result in greater tonnages of waste being transported to Alsager and Macclesfield, which could result in an in-direct impact on recycling rates at these sites should they already be at (or close to) maximum.

This could also give rise to increased levels of congestion at the alternative sites if they become congested due to the additional users.

The combined and cumulative effects of the closure on recycling rates and congestion at alternative sites is therefore considered to be **moderate adverse.**

8.8 Mitigation measures

To enable residents to easily access recycling for some waste types, it is recommended that CEC investigates options to provide bring sites in the area which are outside a 15-minute travel time.

A geographical illustration which identifies the required area is provided within the figure 6 below.

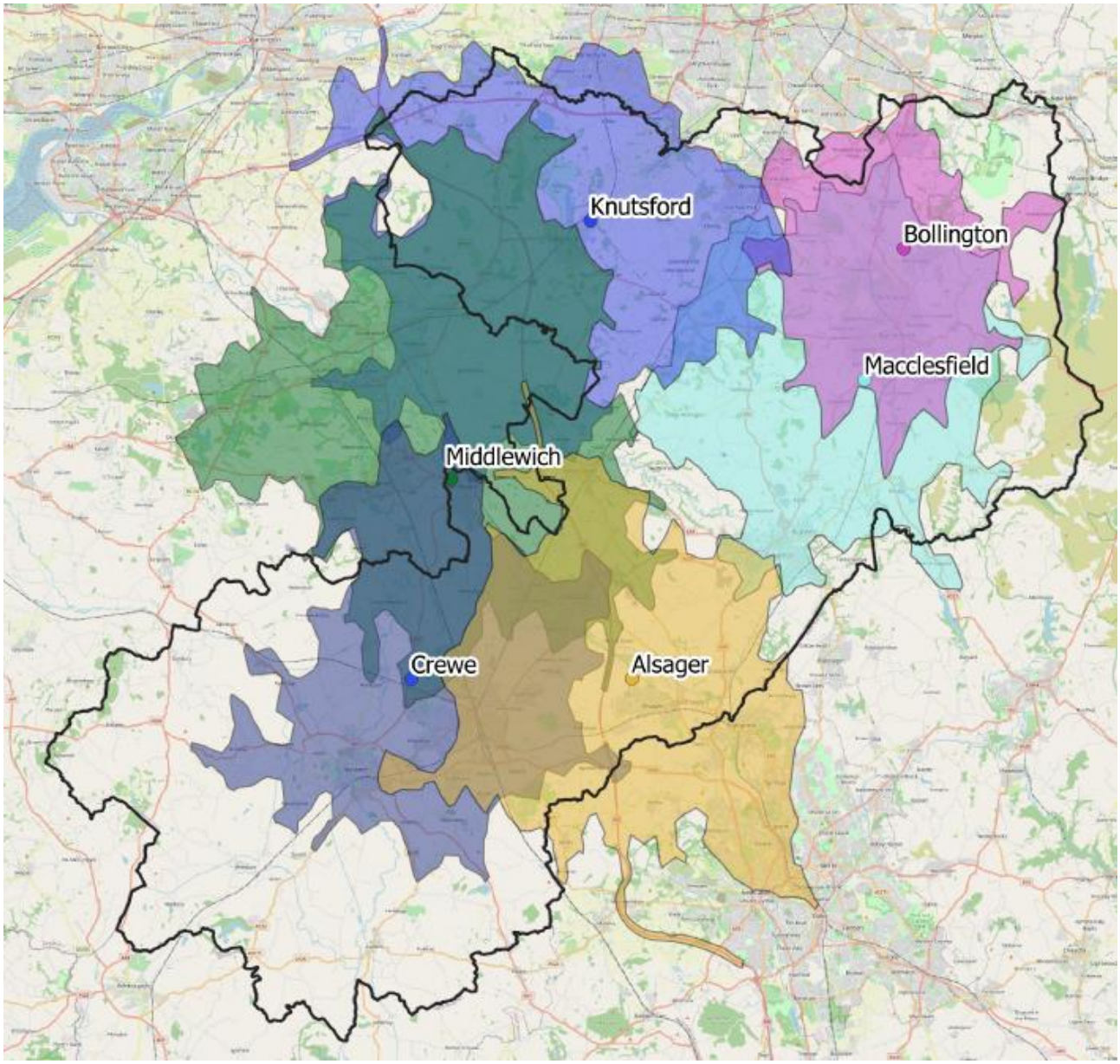

Figure 6: 15 Minute Travel Time.

This boundary covers an area to the West of Congleton, which runs between the River Dane and the A54. This area encompasses the villages of Somerford, Brereton Heath, Davenport, Sandlow and Swettenham to Twemlow Green.

An investigation of potential sites/options for 'bring' facilities within these locations such as supermarket or council car parks should be undertaken.

Although it is not possible to provide bring bank facilities for wood or green waste, the following items are possible:

- Glass
- Card
- Paper and,
- Textiles.

This may reduce the proportion of these wastes being taken to an alternate HWRC reducing some of the 9.03% of these wastes, which are currently being taken to the Congleton site. This will reduce the impact of the closure of Congleton HWRC to **neutral** and potentially to **minor beneficial** as such bring sites will encourage greater local recycling.

To insure against cumulative impacts associated with the pressure on alternate HWRC sites, the efficiency of the operations should be optimised. In addition, further investigation regarding the potential of fairer access such as extended operating hours and managed access systems could reduce congestion at these sites. With the implementation of these measures, cumulative impacts of the closure could reduce to **neutral**.

In addition to mitigating potential effects associated with recycling rates, these mitigation measures may provide a beneficial impact on:

- Traffic: The provision of bring sites will reduce the need to travel to a HWRC.
- Congestion: The provision of a managing fairer access will reduce congestion at the alternate sites.
- Journey times: The provision of longer opening hours may serve to reduce congestion.
- Vulnerable People and the Elderly: The provision of bring sites will increase accessibility for the recycling of these materials.
- Employment: The provision of longer opening hours and the need to service the 'bring' sites may provide redeployment opportunities.

8.9 Residual Impacts

A summary of residual effects is provided in Table 15 below:

Table 15: Summary of Residual Effects

	Nature of effect	Duration	Significance	Possible Mitigation	Residual
Recycling Rates	Direct	Permanent	Minor Adverse	Bring Sites & Infrastructure improvements	Minor Beneficial
Future Demand	Direct	Permanent	Neutral	n/a	Neutral
Cumulative effects on recycling provision at alternate sites	Indirect	Permanent	Moderate Adverse	Bring Sites The management of fairer access systems. Wider infrastructure improvements.	Neutral
Overall	Direct	Permanent	Minor Adverse	As above	Neutral

9 Conclusions

Table 16 below summarises the findings of the environmental appraisal in accordance with the appraisal scoring system contained within the SEA.

Table 16: Summary of Effect

SEA Objective	Assessment	Impact	Possible Mitigation	Residual Impact
Population & Human Health Material Assets	**Transportation**	Moderate Adverse	Bring sites. The management of fairer access systems.	Minor Adverse
Air Quality Population & Human Health	**Air Quality**	Neutral	N/A	Neutral to Minor Beneficial
Climate Factors	**Climate Change**	Moderate Adverse	Bring sites. Infrastructure Improvements.	Minor Adverse
Population & Human Health	**Amenity**	Neutral	Signage and CCTV	Neutral
Employment Social Inclusion	**Socio Economic**	Minor Adverse	Redeployment and infrastructure improvements.	Neutral
Population & Human Health Material Assets	**Future Demand & Recycling**	Minor Adverse	Bring sites. The management of fairer access systems. Wider infrastructure improvements.	Neutral

As indicated in Table 1 and section 2.7 of this report, the SEA objectives associated with the closure of the Congleton HWRC generally have the potential to offer the local area a benefit due to the removal of the existing site or are not applicable.

This assessment has identified that there are several areas where the proposal has a neutral to moderate adverse impact before mitigation measures are applied, these are summarised in Table 16 above.

Following implementation of the recommended mitigation measures summarised above, the residual impact of closing the Congleton HWRC ranges between **minor beneficial to minor adverse**. The adverse impact on the closure focuses on the additional distances that the waste will be transported by residents and the additional carbon that this transportation will generate.

The minor adverse impact is likely to be offset by improvements in the sustainability of the existing facilities network CEC's Waste Management Strategy. These include:

- The continued progress of residents to successfully reduce and reuse materials reducing the need to transport them to a HWRC.
- Consideration of onwards travel of the consolidated waste materials from the remaining HWRCs and the economies of scale that bulking of materials generally achieve.
- Optimisation of the existing HWRC sites to ensure they are fully utilised which will avoid increasing the carbon footprint and impacts of local amenity through the provision of a new site.
- The improvement of existing sites leading to an increase in recycling and reuse rates, which would typically have a greater carbon saving than a small additional distance travelled by residents.
- Wider carbon offsetting measures such as the utilisation of hydrogen collection vehicles and Borough level carbon offsetting.
- Financial considerations associated with the management and running of the facilities.

10 Recommendations

This report assesses the worst-case scenario associated with the generation of traffic and usage of the alternate sites after the closure of Congleton. CEC will need to monitor the effects of the closure and investigate the following recommendation measures based on need.

The following mitigation measures are recommended to limit the potential impacts of closing the Congleton HWRC.

- The provision of signage and CCTV at the Congleton site to deter fly-tipping.
- Investigation into the management of fairer access at the alternate sites such as the extension of opening hours and managed access arrangements.
- The provision of bring sites in locations which are over 8km from a HWRC.
- Investigation into the potential for further upgrades to existing infrastructure.

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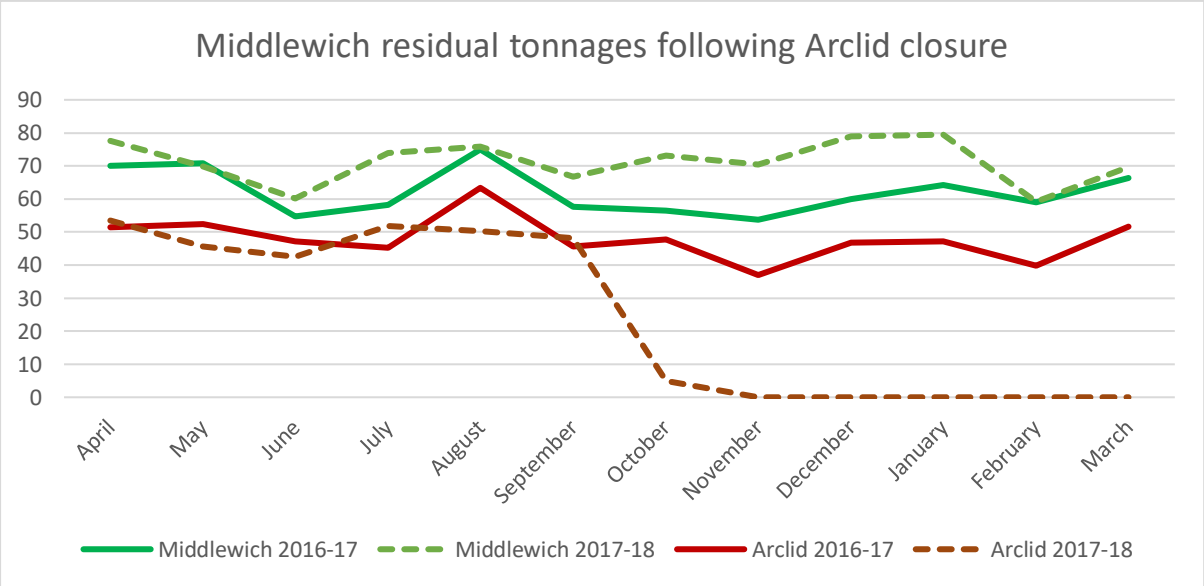
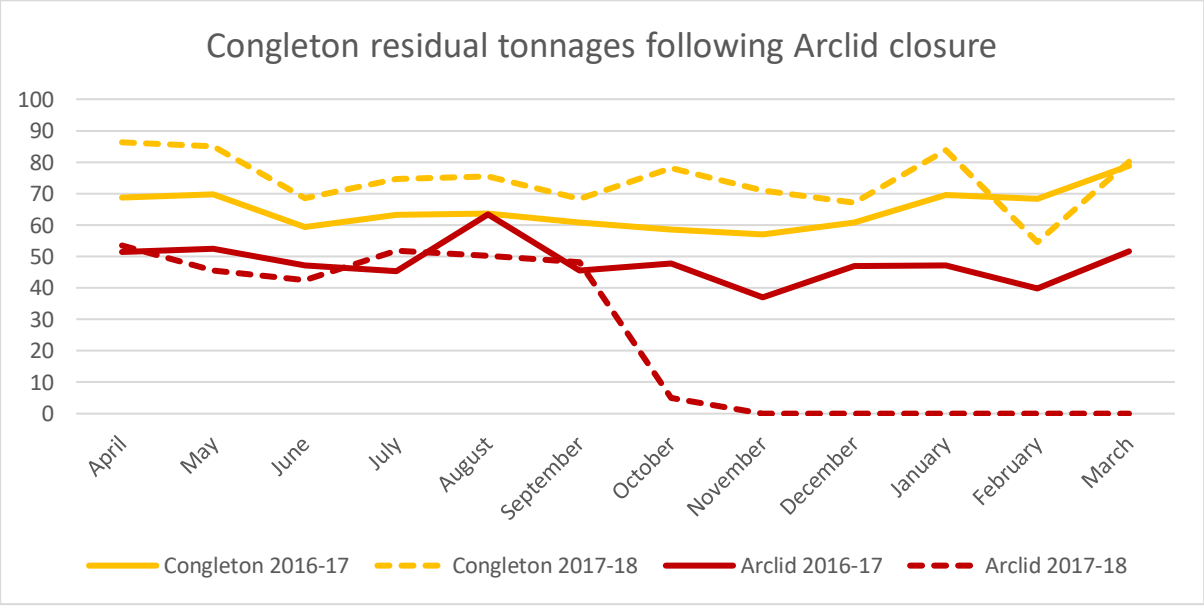
Impact on residual tonnages when Arclid closed.

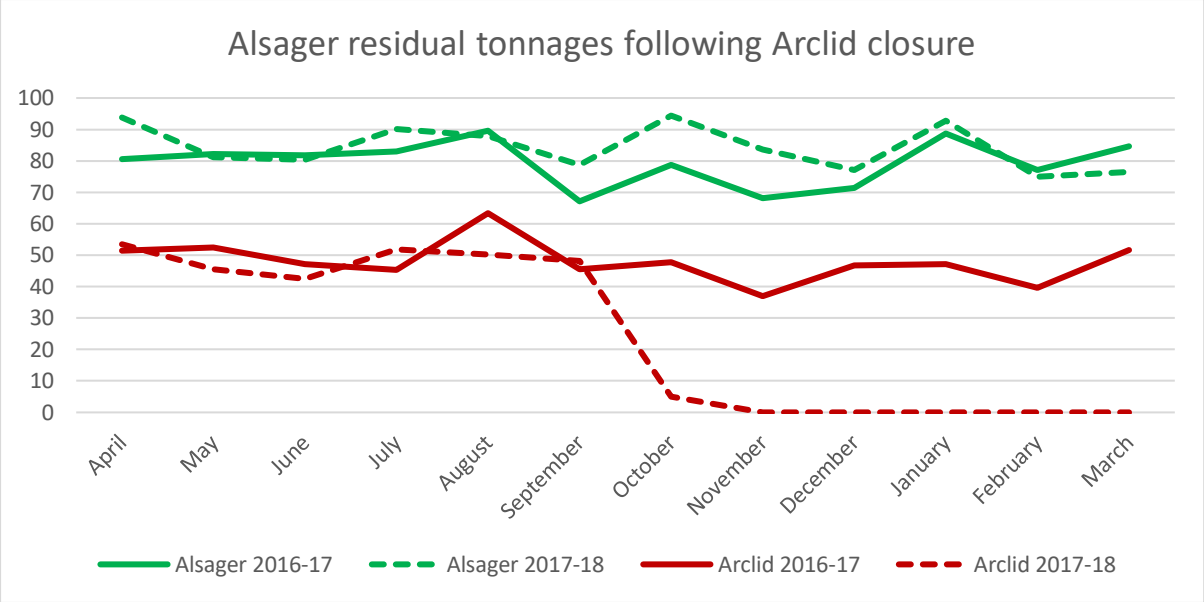
The three charts below show the residual monthly tonnages that were deposited at each of Congleton, Middlewich and Alsager compared with the tonnages at Arclid.

The solid line gives the tonnages the year before the closure of Arclid, the dotted lines give the year Arclid closed. Matters of note:

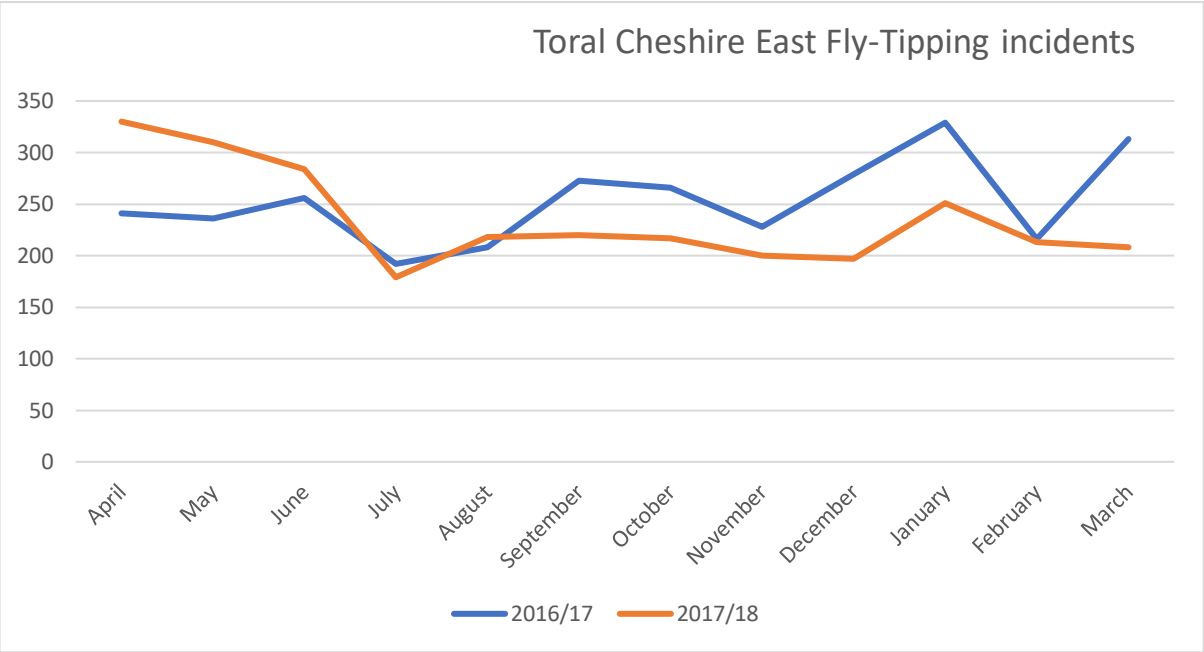
- Arclid received between 40-50 tonnes of residual per month, we might therefore expect some of this to go to other local sites
- Each chart shows that the closure had little impact on the tonnages received. The dotted lines follow a similar pattern to the previous year but generally higher
- In the 6 months prior to closure the three sites accepted 139 tonnes more than they did in the previous year (probably due to normal user fluctuations), in the 6 months after closure the three sites received 144 tonnes more than the previous year
- There seems to be little link between the residual tonnages at neighbouring sites and the closure of Arclid







Year	April	May	June	July	August	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Total
Alsager 2016-17	80.5	82.14	81.76	83	89.6	67.14	78.64	68.09	71.44	88.62	77.18	84.66	952.77
Alsager 2017-18	93.76	81.07	80.42	90.16	87.87	78.78	94.4	83.52	77.14	92.84	74.96	76.42	1011.34
Congleton 2016-17	68.8	69.74	59.42	63.29	63.54	60.76	58.54	57	60.86	69.48	68.32	78.82	778.57
Congleton 2017-18	86.29	85.1	68.56	74.54	75.5	68.33	78.04	71.02	67.1	83.78	54.54	80.18	892.98
Middlewich 2016-17	70.07	70.84	54.72	58.13	74.98	57.54	56.44	53.72	59.9	64.16	58.99	66.28	745.77
Middlewich 2017-18	77.66	69.88	60.1	73.86	75.92	66.68	73.04	70.42	79.02	79.46	59.18	69.7	854.92
Arclid 2016-17	51.34	52.44	47.18	45.25	63.37	45.6	47.74	36.98	46.84	47.14	39.72	51.63	575.23
Arclid 2017-18	53.48	45.6	42.48	51.82	50.28	48.15	5.02	-	-	-	-	-	296.83
Difference from previous year													
Alsager	13.26	-1.07	-1.34	7.16	-1.73	11.64	15.76	15.43	5.7	4.22	-2.22	-8.24	58.57
Congleton	17.49	15.36	9.14	11.25	11.96	7.57	19.5	14.02	6.24	14.3	-13.78	1.36	114.41
Middlewich	7.59	-0.96	5.38	15.73	0.94	9.14	16.6	16.7	19.12	15.3	0.19	3.42	109.15
Tonnage change in 6 months from previous year prior to closure	138.51												
Tonnage change in 6 months after closure	143.62												



	April	May	June	July	August	September	October	November	December	January	February	March
2016/17	241	236	256	192	208	273	266	228	279	329	216	313
2017/18	330	310	284	179	218	220	217	200	197	251	213	208

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FORWARD PLAN FOR THE PERIOD ENDING 31 JUNE 2021

This Plan sets out the key decisions which the Executive expects to take over the period indicated above. The Plan is rolled forward every month. A key decision is defined in the Council's Constitution as:

> "an executive decision which is likely –
>
> (a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or
>
> (b) to be significant in terms of its effects on communities living or working in an area comprising one or more wards or electoral divisions in the area of the local authority.
>
> *For the purpose of the above, savings or expenditure are "significant" if they are equal to or greater than £1M."*

Reports relevant to key decisions, and any listed background documents, may be viewed at any of the Council's Offices/Information Centres 5 days before the decision is to be made. Copies of, or extracts from, these documents may be obtained on the payment of a reasonable fee from the following address:

Democratic Services Team
Cheshire East Council
c/o Westfields, Middlewich Road, Sandbach Cheshire CW11 1HZ
Telephone: 01270 686472

However, it is not possible to make available for viewing or to supply copies of reports or documents the publication of which is restricted due to confidentiality of the information contained.

A record of each key decision is published within 6 days of it having been made. This is open for public inspection on the Council's Website, at Council Information Centres and at Council Offices.

This Forward Plan also provides notice that the Cabinet, or a Portfolio Holder, may decide to take a decision in private, that is, with the public and press excluded from the meeting. In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, 28 clear days' notice must be given of any decision to be taken in private by the Cabinet or a Portfolio Holder, with provision for the public to make representations as to why the decision should be taken in public. In such cases, Members of the Council and the public may make representations in writing to the Democratic Services Team Manager using the contact details below. A further notice of intention to hold the meeting in private must then be published 5 clear days before the

meeting, setting out any representations received about why the meeting should be held in public, together with a response from the Leader and the Cabinet.

The list of decisions in this Forward Plan indicates whether a decision is to be taken in private, with the reason category for the decision being taken in private being drawn from the list overleaf:

1. Information relating to an individual
2. Information which is likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including to authority holding that information)
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under the authority
5. Information in respect of which a claim to legal and professional privilege could be maintained in legal proceedings
6. Information which reveals that the authority proposes (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or (b) to make an order or direction under any enactment
7. Information relating to any action taken or to be taken in connection with the prevention, investigation of prosecution of crime

If you would like to make representations about any decision to be conducted in private at a meeting, please email:

Paul Mountford, Executive Democratic Services Officer
paul.mountford@cheshireeast.gov.uk

Such representations must be received at least 10 clear working days before the date of the Cabinet or Portfolio Holder meeting concerned.

Where it has not been possible to meet the 28 clear day rule for publication of notice of a key decision or intention to meet in private, the relevant notices will be published as soon as possible in accordance with the requirements of the Constitution.

The law and the Council's Constitution provide for urgent key decisions to be made. Any decision made in this way will be published in the same way.

Forward Plan

Key Decision and Private Non-Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-3 Flowerpot Junction Improvement Scheme	To approve procurement of works to improve Flowerpot Junction, utilising the NPIF allocation from DfT and local funding contributions from s106 contributions and council match funding. Authorise the preparation and making of a CPO relating to land required for the junction improvements where this cannot be acquired through negotiation, and delegate authority to the Director of Infrastructure and Highways, in consultation with the Portfolio Holder for Strategic Transport to finalise the scheme details and enter into an agreement with the Council's appointed Highways Term Services to deliver the scheme.	Cabinet	9 Mar 2021			N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-7 Covid-19 - Update on Response and Recovery	To receive an update report on the Council's response to Covid-19 and the Recovery Plan. To note the financial effects of Covid-19 on the Council, as regards additional expenditure and loss of income, and to consider the potential options for managing residual financial implications within the Council's Medium-Term Financial Strategy. An update report will be presented to each successive Cabinet meeting up to and including 4th May 2021.	Cabinet	9 Mar 2021		Jane Burns, Executive Director of Corporate Services	N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-22 Housing Repairs and Adaptations for Vulnerable People Financial Assistance Policy	To approve the Housing Repairs and Adaptations for Vulnerable People Financial Assistance Policy 2021-2026, and to authorise Officers to take all necessary actions to implement the proposal.	Cabinet	9 Mar 2021		Karen Whitehead	N/A
CE 20/21-32 Dedicated Schools Grant Management Plan 2021/22 to 2024/25	To approve the Council's Dedicated Schools Grant Management Plan 2021/22 to 2024/25.	Cabinet	9 Mar 2021		Jacky Forster, Director of Education and 14-19 Skills	N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-35 Shareholder Committee Review of Council Owned Company Business Plans	The report provides endorsement from the ASDV Shareholder Committee for the 2021 Business Plans for Orbitas Bereavement Services Ltd, Transport Service Solutions Ltd and ANSA Environmental Services Ltd, and provides recommendation for the Portfolio Holder to consider alongside approving these business plans.	Deputy Leader of the Council	Not before 19th Mar 2021		Frank Jordan, Deputy Chief Executive and Executive Director of Place	

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-34 Article 4 Directions for Small Houses in Multiple Occupation	Decision to confirm three non-immediate Article 4 Directions, to come into effect on 1 November 2021, for the areas in Crewe around Nantwich Road, West Street and Hungerford Road, having considered the feedback from public consultation carried out between 19 October 2020 and 11 January 2021.	Portfolio Holder for Planning	Not before 31st Mar 2021		Claire Coombs	
CE 20/21-33 Houses in Multiple Occupation Supplementary Planning Document	Approval is sought to publish the Houses in Multiple Occupation Supplementary Planning Document and Consultation Statement for the purpose of seeking representations.	Portfolio Holder for Planning	Not before 31st Mar 2021		Claire Coombs	

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-36 Draft Housing Supplementary Planning Document	To approve the draft Housing Supplementary Planning Document for 4 weeks consultation, alongside publishing supporting information including the Strategic Environmental Assessment, Habitat Regulations Assessment screening report and Equalities Impact Assessment screening report.	Portfolio Holder for Planning	Not before 2nd Apr 2021		Tom Evans	
CE 20/21-26 Site Allocations and Development Policies Document (SADPD) Submission	To approve the submission of the Site Allocations and Development Policies Document to the Secretary of State for independent examination by an appointed Planning Inspector.	Cabinet	13 Apr 2021		Jeremy Owens	N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-28 Homelessness and Rough Sleeping Strategy 2021-25	To authorise Officers to consult formally on the draft Homelessness and Rough Sleeping Strategy 2021-2025; and to delegate authority to the Director of Growth and Enterprise in consultation with the Portfolio Holder for Environment and Regeneration to consider the results of the consultation and to approve the final version of the strategy.	Cabinet	13 Apr 2021		Karen Carsberg, Strategic Housing and Intelligence Manager	N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-29 Household Waste Recycling Centre New Contract Service Provision	The household waste recycling centre contract is due for renewal in 2023 and the open procurement process will start in 2021. This report will present the results of the public consultation carried out Nov 2020 – Jan 2021 to inform the procurement and will seek to authorise officers to take all necessary actions to implement the proposal.	Cabinet	13 Apr 2021		Ralph Kemp, Corporate Manager for Commissioning	N/A
CE 20/21-31 Updated Asset Transfer Policy	To approve a new Asset Transfer Policy and authorise the Portfolio Holder for Environment and Regeneration to vary the policy from time to time.	Cabinet	13 Apr 2021		Peter Skates	N/A
CE 18/19-60 The Minerals and Waste Development Plan	To seek approval to consult on the first draft of the Minerals and Waste Development Plan.	Cabinet	4 May 2021		David Malcolm	N/A

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-23 ASDV Review	To approve the recommendations within the report and authorise Officers to take all necessary actions to implement them.	Cabinet	4 May 2021		Richard Hibbert	Fully exempt - paras 3 and 4
CE 20/21-30 Update on the Beechmere Recovery Programme	To update Cabinet on progress relating to the reinstatement of Beechmere Extra Care Housing and the proposed remedial works for the remaining four `Meres' and the impact this will have for the Council.	Cabinet	4 May 2021		Nichola Thompson, Director of Commissioning	Fully exempt - paras 3 & 5

Key Decision	Decisions to be Taken	Decision Maker	Expected Date of Decision	Proposed Consultation	How to make representation to the decision made	Private/ Confidential and paragraph number
CE 20/21-27 Crewe HS2 Hub Update	To approve preferred concept designs for the Crewe HS2 Hub Station scheme and supporting funding and financing strategy; and to authorise the progression of the work towards a planning application and to conclude funding and financing discussions with Government.	Highways and Transport Committee	July 2021		Hayley Kirkham	N/A

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Environment and Regeneration Overview and Scrutiny Committee

Date of Meeting: 15 March 2021

Report Title: Work Programme

Portfolio Holder: Councillor C Browne – Deputy Leader

Councillor T Fox – Portfolio Holder for Planning

Councillor N Mannion – Portfolio Holder for Environment and Regeneration

Councillor L Crane – Portfolio Holder for Highways and Waste

Councillor M Warren – Portfolio Holder for Communities

Senior Officer: Executive Director of Corporate Services

1. Report Summary

1.1. To review items in the work programme listed in the schedule attached, together with any other items suggested by committee members.

2. Recommendation

2.1. That the work programme be reviewed.

3. Reasons for Recommendation

3.1 It is good practice to review the work programme and update accordingly

4. Other Options Considered

4.1. There are no further options to consider.

5. Background

5.1 The schedule attached has been updated following the last meeting of the committee.

5.2 Members are asked to review the schedule attached to this report, and if appropriate, add new items or delete items that no longer require any scrutiny activity. When selecting potential topics, Members should have regard to the Council's new three year plan and also to the general criteria listed below, which

should be applied to all potential items when considering whether any Scrutiny activity is appropriate.

5.3 The following questions should be asked in respect of each potential work programme item:

- Does the issue fall within a corporate priority;
- Is the issue of key interest to the public;
- Does the matter relate to a poor or declining performing service for which there is no obvious explanation;
- Is there a pattern of budgetary overspends;
- Is it a matter raised by external audit management letters and or audit reports?
- Is there a high level of dissatisfaction with the service;

5.4 If during the assessment process any of the following emerge, then the topic should be rejected:

- The topic is already being addressed elsewhere
- The matter is subjudice
- Scrutiny cannot add value or is unlikely to be able to conclude an investigation within the specified timescale

6. Implications

6.1. Legal Implications

6.1.1. There are no legal implications at this stage.

6.2. Finance Implications

6.2.1. There are no financial implications at this stage

6.3. Equality Implications

6.3.1. There are no equalities implications at this stage.

6.4. Human Resources Implications

6.4.1. There are no human resources implications at this stage.

6.5. Risk Management Implications

6.5.1. There are no risk management implications at this stage.

6.6. **Rural Communities Implications**

6.6.1. There are no implications for rural communities.

6.7. **Implications for Children & Young People**

6.7.1. There and no implications for children and young people at this stage.

6.8. **Public Health Implications**

6.8.1. There are no direct implications for public health.

7. Ward Members Affected

7.1. All.

8. Access to Information

8.1. The background papers can be inspected by contacting the report author.

9. Contact Information

9.1. Any questions relating to this report should be directed to the following officer:

Name: Helen Davies

Job Title: Scrutiny Officer

Email: helen.davies@cheshireeast.gov.uk

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Work Programme **Environment and Regeneration Overview and Scrutiny Committee** Updated 02.03.2021

Date:**15.3.21**
Time:
10.00am
Venue:
Virtual
Microsoft
Teams
Meeting

Item	Purpose	Lead Officer	Portfolio	Suggested by	Scrutiny role	Corporate priorities	Date
Carbon Action Plan: Update	To scrutinise the actions relating to land allocation and procurements for initial projects contributing to sustainable energy generation and green sequestration.	Ralph Kemp, Corporate Manager for Commissioning	Environment & Regeneration	Committee	Pre-Decision Scrutiny	Cheshire East is a green and sustainable place	15.03.21
Household Waste & Recycling Centre- Consultation results and draft recommendations	To review the results of the consultation relating to the Household Waste and Recycling Centre and draft recommendations since the last review on the 12 Feb 2021.	Executive Director of Place and Deputy Chief Executive	Environment & Regeneration	Executive Director of Place and Deputy Chief Executive	Scrutiny	Cheshire East is a green and sustainable place	15.03.21
Draft Air Quality Plan: Update	To scrutinise the draft Air Quality Plan	Executive Director of Place and Deputy Chief Executive	Environment & Regeneration	The Committee	Pre-decision Scrutiny	Cheshire is a Green and sustainable Place.	~~15.03.21~~ Will not be ready and will be passed to the new Environment & Communities Committee.
Post Overview & Scrutiny	An opportunity to enable the Committee to reflect on past pieces of Overview & Scrutiny work, and current priorities in	Executive Director of Place and	Environment & Regeneration	The Committee	Advisory	A responsible, effective and efficient organisation.	15.03.21

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Item	Purpose	Lead Officer	Portfolio	Suggested by	Scrutiny role	Corporate priorities	Date
	order to inform and advise the incoming Environment & Communities Committee	Deputy Chief Executive					
Task & Finish Group	To undertake an in-depth review of flooding and flood risk management in Cheshire East to enable a number of meetings that include local ward councillors and the Town Council, to scrutinise the impacts of the 2019 flooding in the various areas of Cheshire East that were affected (e.g. Poynton, Kettleshulme, Adlington, Prestbury, Bollington were named as some of the example areas).	Executive Director of Place and Deputy Chief Executive	Environment & Regeneration	The Committee	Overview & Scrutiny	A responsible, effective and efficient organisation.	Ongoing

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