

**From:** Susan Carey, Cabinet Member for Environment  
Simon Jones, Corporate Director of Growth Environment Transport

**To:** Environment & Transport Cabinet Committee – 23 May 2023

**Subject:** Household Waste Recycling Centre Review

**Classification:** Unrestricted

**Past Pathway of report:** First report

**Electoral Division:** All Divisions

**Summary:** Over the past decade, KCC has implemented a range of policy and service changes at Household Waste and Recycling Centres (HWRCs) that have resulted in annual revenue savings of over £5m.

The delivery of KCC's medium term financial plan requires additional savings of £2.2m at HWRCs over the next two years. Around £700,000 of this is allocated to the delivery of greater materials segregation for recycling, increased reuse, black bag splitting to prevent materials going into residual waste and increasing trade waste recycling. The remaining £1.5m is allocated to a review of the number and operation of the sites.

Of this £1.5m saving, the aim is to reduce the cost of the service by £500,000 in 2023/24, with a further £1m saving in 2024/25.

An initial review of how this saving could be achieved has been carried out and three options have been identified. All three options would lead to the closure of some sites, with two options closing fewer sites but reducing the opening hours on a number of the remaining sites.

It is proposed that a 12-week consultation with the public and with other stakeholders takes place on these options, with the results of this consultation and recommended next steps then returning to this Committee for discussion.

**Recommendation(s):**

The Cabinet Committee is asked to consider and/or make recommendations to the Cabinet Member on the proposed options for delivering the budgetary savings required in 2023/24 and 2024/25 and agree to consult with the public and other stakeholders on these options.

## 1. Background

1.1 KCC currently operates a network of 19 Household Waste and Recycling Centres (HWRCs) spread across the county. These sites receive approximately 1.7m visits per year, with around 96,000 tonnes of material being managed through the network.

- 1.2 Over the past decade, a range of policy and service changes have taken place across the network, which have resulted in annual revenue savings of over £5m. These include charging for non-household waste materials such as soil, rubble, hardcore, plasterboard and tyres, restricting access to the site for certain vehicles, from April 2023, charging non-Kent residents £10 to visit the sites and operating a booking system that enables residents to book a slot that allows access to a site without queuing.
- 1.3 Use of the sites has reduced significantly over the past five years. In 2017/18, 175,172 tonnes of material were managed through the sites, which reduced to 94,250 tonnes in 2022/23. Over the same period, the amount of fly tipped waste collected by district and borough councils reduced from 3,794 tonnes to 2,175 tonnes.
- 1.4 There are currently just over 4 million slots available per year, which equates to around 77,000 slots per week. In 2022/23, just over 32,000 slots were booked per week.
- 1.5 The delivery of KCC's medium term financial plan requires savings to be made at the sites. Over the next two years, around £700,000 of savings are allocated to the delivery of greater materials segregation for recycling, increased reuse, black bag splitting to prevent materials going into residual waste and increasing trade waste recycling.
- 1.6 Over the same time period, an additional £1.5m is allocated to a review of the number and operation of the sites.
- 1.7 Of this total saving requirement of £2.2m, £1.1m needs to be saved in 2023/24.

## **2. Reviewing the number and operation of sites**

- 2.1 A review has been carried out to identify service reduction options that could save £1.5m over the next two years, whilst limiting the impact on Kent residents as far as possible.
- 2.2 The options considered were closing the sites on certain days of the week, full site closures or a combination of the two.
- 2.3 Part week closures
  - 2.3.1 Savings from closing sites for part of the week come from a reduction in management fees and staffing costs.
  - 2.3.2 For sites that are co-located with waste transfer stations, the majority of these savings would not be realised as staff work across both operations. These sites were therefore not considered for part week closures.
  - 2.3.3 The table below shows the average number of visitors per week for each of the remaining sites and the reduction in capacity that would occur from a two-day closure:

HWRC	Average visits per week 2022/23	Number of slots lost through closure on 2 quietest days
Sheerness	784	680
Faversham	881	850
Swanley	902	1,020
New Romney	1,128	1,190
Richborough	1,214	680
Dartford	1,309	1,190
Deal	1,392	1,020
Folkestone	2,029	830
Canterbury	2,012	1,360
Herne Bay	2,105	1,190
Dover	2,140	1,190
Maidstone	2,492	1,360
Margate	3,175	1,870
<i>Total for 7 least busy sites</i>	<i>7,610</i>	<i>6,630</i>
<i>Total for 6 busiest sites</i>	<i>13,953</i>	<i>7,800</i>
<b>Total</b>	<b>21,563</b>	<b>14,430</b>

Table 1: Average weekly visitors to HWRCs not co-located with transfer stations

2.3.4 If all of these sites closed for two days per week, the approximate cost saving to KCC would be £740,000 and capacity would be reduced by 14,430 slots per week.

2.3.5 If the seven sites where customer demand is lower were closed for two days per week, the saving to KCC would be approximately £360,000 and capacity would be reduced by 6,630 slots per week.

## 2.4 Full site closures

2.4.1 Savings from closing sites will be realised through no longer paying business rates, utility costs, contractor charges, reduced haulage charges and where appropriate, lease costs. There is not expected to be any further reduction of waste volumes.

2.4.2 Sites that are proposed for closure were determined by consideration of geography and where there is capacity at an alternative site(s). Modelling and analysis were focused on keeping drive times to a minimum.

2.4.3 A 20-minute drive time for households to their nearest sites is recommended by the Waste and Resources Action Programme (WRAP) in their advice to DEFRA when considering the appropriate network of HWRCs that a waste disposal authority should maintain.

2.4.4 Figure 1 below shows the current drive time catchment area for the network. 96% of households are currently within a 20 minute off peak drive to a HWRC.

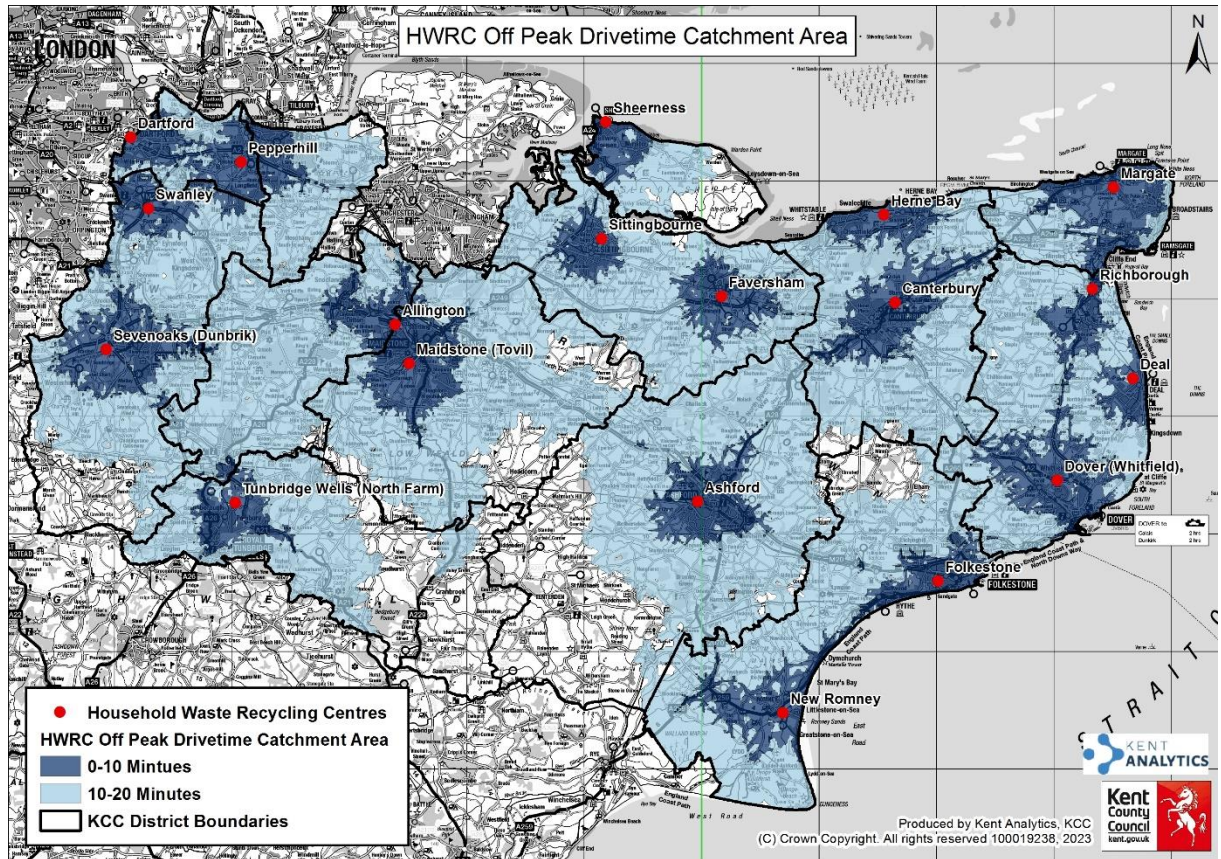


Figure 1: Drive time catchment area for current HWRC network

2.4.5 Analysis shows that it would be possible to meet the £1.5m savings target through the closure of sites at Dartford, Richborough, Maidstone and Faversham. This would reduce the number of households within a 20 minute off peak drive of a HWRC by 11,953, which equates to a reduction from 96% to 94.2% of all Kent households. The capacity of the network would also be reduced by 13,920 slots per week, which equates to a reduction in capacity of 18.1%.

2.4.6 Table 2 below shows how this breaks down by site:

Scenario	Total KCC households	Households within a 20 min off peak drive time of a HWRC	Number of additional households outside 20 min off peak drive time compared to existing network	% of households within 20 min off peak drive time of a HWRC	Slots available for booking per week
----------	----------------------	--	---	---	--------------------------------------

Existing Household Waste Recycling Centre Network	693,351	665,434		96.0%	76,945
Existing Household Waste Recycling Centre Network Excluding Dartford	693,351	665,434	0	96.0%	72,885
Existing Household Waste Recycling Centre Network Excluding Richborough	693,351	664,691	743	95.9%	74,625
Existing Household Waste Recycling Centre Network Excluding Maidstone (Tovil)	693,351	661,162	4,272	95.4%	72,305
Existing Household Waste Recycling Centre Network Excluding Faversham	693,351	658,496	6,938	95.0%	74,045
Existing Household Waste Recycling Centre Network Excluding Dartford, Faversham, Maidstone (Tovil) & Richborough	693,351	653,481	11,953	94.2%	63,025

Table 2: Impact of site closures on off peak drive times and capacity of the remaining network

2.4.7 Further analysis has been carried out to understand the impact on neighbouring sites from the increased demand that would result from these closures.

2.4.8 This analysis indicates that overall, there is sufficient capacity to manage this change in demand, although Sundays would be nearing capacity across a number of sites. There are, however, opportunities to further extend opening hours at weekends if required, in accordance with current planning conditions.

## 2.5 Combination of part and full site closures

2.5.1 It would be possible to combine part week and full week closures and still meet the £1.5m savings requirement. However, three sites would still need to be closed under any option and owing to the differences in operating costs, the sites at Faversham and Richborough would need to close under all options.

## 2.6 Considerations and options

2.6.1 Closing sites for two days per week does not deliver the savings required from the service.

2.6.2 Option 1 is to close the four sites set out in section 2.4 above, given that this delivers the required savings target. The consequences of this are an

increase of 1.8% of households who are not within a 20-minute drive of a HWRC and a reduction in network capacity of 18.1%. As discussed in section 1, there is currently significant spare capacity across the network to deal with this reduction. In this option, there are no changes to opening times at the other HWRCs.

2.6.3 Option 2 would require the sites at Faversham, Maidstone and Richborough to close and for the remaining 10 sites not co-located with a transfer station to close for two days per week. The consequences of this are an increase of 1.8% of households who are not within a 20-minute drive of a HWRC and a reduction in network capacity of 27.8%.

2.6.4 Option 3 would require the sites at Dartford, Faversham and Richborough to close and for the remaining 10 sites not co-located with a transfer station to close for two days per week. The consequences of this are an increase of 1.1% of households who are not within a 20-minute drive of a HWRC and a reduction in network capacity of 27.3%.

2.6.5 The impact on drive times and capacity of each of these options is set out in table 3 below.

Scenario	Households within a 20 min off peak drive time of a HWRC	Number of additional households outside 20 min off peak drive time compared to existing network	% of households within 20 min off peak drive time of a HWRC	Reduction in slots available per week	% reduction in slots per week
Existing	665,434	-	96.0%	-	-
Option 1	653,481	11,953	94.2%	13,920	18.1%
Option 2	653,481	11,953	94.2%	21,400	27.8%
Option 3	657,753	7,681	94.9%	20,990	27.3%

Table 3: Impact on off peak drive times and network capacity of different site closure options

### 3. Approach to consultation

3.1 The consultation with residents and other stakeholders will ask for views on the above three options and provide an opportunity for alternative proposals to be put forward.

3.2 It will also seek views on the potential to replace unsustainable small sites with larger, multifunctional sites that will enable more materials to be segregated for recycling and provide an improved service to residents.

3.3 The consultation is scheduled for 12 weeks from mid-July, subject to discussions at the Committee meeting today.

3.4 Findings from the consultation will then be analysed and a final proposal developed. Given the need to make savings in 23/24, this proposal will come back to the Committee as soon as practicable later in the financial year.

## **4. Financial implications**

- 4.1 Indicative full year effect savings of around £1.5m have been developed for each of the scenarios from high-level savings of related overheads, utility and contractor costs. These will be subject to more detailed refinement to account for the contractual change control process with service suppliers, notice to leaseholders and cessation of sub-contractor arrangements.
- 4.2 In consideration of the sites for potential closure, the business considers that most are not suitable for further investment and development to meet new burdens of environmental regulations.
- 4.3 For context, there is an existing capital and development programme in place to meet the waste growth of materials collected at the kerbside by district and borough councils in Kent. This is a programme to deliver new Waste Transfer Station infrastructure in Sevenoaks and Folkestone & Hythe, further details of this continued programme will be discussed at future Cabinet Committees.
- 4.4 There are likely to be views asking whether there can be additional trade waste services at the HWRCs. These services are already provided where permitting allows, resulting in annual royalties of £226,000. There is a target to increase trade waste income by £190,000 in 2023/24, which was reported to the Environment and Transport Cabinet Committee in January 2023. Trade waste is already collected at KCC's waste transfer stations; however, the margins are not substantial enough to realistically meet this savings target of £1.5m. Increasing margins would result in uncompetitive gates fees and a reduction in income.

## **5. Legal implications**

- 5.1 The Environmental Protection Act (1990) states that Authorities should provide a place for recycling. This is not to say that such a facility must be provided within a designated District or Borough.
- 5.2 Under Common Law the need to consult arises:
  - Where there is a withdrawal of a benefit with significant impacts to be considered and/or an interest which is held to be sufficient to warrant such an expectation.
  - From some promise to consult or where official guidance or policies imply a promise to act in a particular way.
  - Where there is well established practice of consultation.
  - Where in exceptional cases, a failure to consult would lead to conspicuous unfairness.

## **6. Equalities implications**

- 6.1 An Equality Impact Assessment (EqIA) has been completed to ensure consideration has been given to the impact of potential HWRC closures and the approach to consultation. The initial assessment has found that the following

protected characteristics may be negatively impacted as a result of the proposed closures:

- Age
- Disability
- Race
- Pregnancy and maternity
- Carer's responsibilities.

- 6.2 The requirement to travel further to an alternative HWRC, because of closures, could impact those within the age, disability, pregnancy & maternity, and carer's responsibility groups. However, as described above, many customers will be within a 20-minute drivetime of an alternative site.
- 6.3 Customers can request additional assistance at the time of booking to visit an HWRC because of age, disability and pregnancy & maternity. This function may be useful if customers are required to use alternative sites, where perhaps individuals may be unfamiliar or encounter different challenges with disposal, because of different layouts / containers etc. Site staff will be available to help all customers with advice and support, as required.
- 6.4 A number of consultation communication considerations have also been identified to encourage participation.
- 6.5 The assessment will be developed further based on feedback from the public consultation, as this is an important means by which we can test our current understanding.

## 7. Other corporate implications

- 7.1 The consultation shall be developed in conjunction with Engagement and Consultation Officers. As the detailed business case is further developed, colleagues in Infrastructure will further advise the service of the existing lease arrangements. The Data Analytics team have already supported the business in providing appropriate levels of analysis included in the supporting appendices.

## 8. Recommendation

### **Recommendation**

The Cabinet Committee is asked to consider and/or make recommendations to the Cabinet Member on the proposed options for delivering the budgetary savings required in 2023/24 and 2024/25 and agree to consult with the public and other stakeholders on these options.

## 9. Contact details

Report Author: David Beaver

Relevant Director: Matt Smyth

Head of Waste Management

Director, Environment & Waste

03000 411620

03000 416676



david.beaver@kent.gov.uk

matthew.smyth@kent.gov.uk