

FINAL REPORT OF THE SCRUTINY REVIEW PANEL ON RECYCLING AND HOUSEHOLD WASTE SITES (RHWS)

Contents

Introduction	2
Scope of the Review	2
Membership of the Panel	2
Conduct of the Review	3
Background Information	4
Legal Duties	4
Guidance on minimum provision for WDAs	4
The current RHWS Service in Leicestershire	5
Location	5
Opening Times	6
Leicestershire RHWS Service Review 2015	6
Current RHWS budget and MTFS Savings proposals	7
The Panel's Considerations	9
Finance	10
Ongoing operational deliverability	11
Catchment areas (including cross boundary use)	12
Site usage patterns and costs	14
Housing growth	16
Site infrastructure / suitability	18
Legal compliance	18
Other factors also raised and considered by the Panel	19
Fly-tipping	19
Recommendations and Conclusions	20
List of Appendices	24
Appendix A - Neighbouring Authorities	25
Appendix B - Current level of service with 5 mile radii	26
Appendix C - Current level of service with 7 mile radii	27
Appendix D - Nine sites with 5 mile radii	28
Appendix E – Nine sites with 7 mile radii	29
Appendix F – RHWS Catchment Area (2017)	30

Introduction

1. This report sets out the conclusions and recommendations arising from the Scrutiny Review Panel investigation into Recycling and Household Waste Sites (RHWS).

Scope of the Review

2. The County Council's Medium Term Financial Strategy 2023/24 – 2026/27 currently proposes a saving of £580,000 from the RHWS service. This is predicated on the closure of five RHWS sites and the reduction of summer opening hours at all sites.
3. The Scrutiny Commissioners on 13 February 2023 appointed a Scrutiny Review Panel to test the assessment criteria applied to identify the sites for closure and to consider how the closures would impact residents for the future. The disposal of waste (including the provision of RHWS) is one of the most visible services provided by the County Council and most of our residents use the service. The Scrutiny Commissioners therefore considered it important that the proposals be scrutinised and the full impact on residents is considered at an early stage; it should be noted the Cabinet has not yet agreed the preferred approach.
4. The following outcomes for the Review were identified by the Scrutiny Commissioners:
 - (a) To consider the assessment criteria applied to determine the prioritisation of RHWS for closure to deliver the identified saving of £580,000 as set out in the MTFS 2023/24 – 2026/27;
 - (b) To provide a high level external view from a Member perspective of the criteria applied, evidence for, and the assumptions made to prioritise sites for closure;
 - (c) To consider the potential impact of site closures.

Membership of the Panel

5. The following members were appointed to serve on the Panel.

Mr. B. Lovegrove CC (Chairman) – Conservative Group.

Mr. R. Allen CC – Conservative Group.

Mr. B. Champion CC – Conservative Group.

Mr. M.H. Charlesworth CC – Liberal Democrat Group.

Mrs. A. J. Hack CC – Labour Group.

Conduct of the Review

6. The Panel met on three occasions between 30 March 2023 and 10 May 2023. All of the Panel meetings were held in private because the matters under discussion (i.e. the potential closure of RHWS) required sharing commercially sensitive information and could impact employees currently working on the sites. If approved (in whole or in part) for consultation by the Cabinet in the future, appropriate engagement with employees will take place in accordance with the Council's HR processes and the law. At the time this report will be presented both to the Environment and Climate Change Overview and Scrutiny Committee and the Cabinet for consideration, those discussions will not have taken place. The decision whether to progress any of the savings proposals considered by the Panel for consultation has not yet been made.
7. The Panel, during the review received presentations on the following:
 - (i) The legislative background and national guidance relating to RHWS;
 - (ii) The County Council's current service offer for RHWS;
 - (iii) The budget/MTFS relating to RHWS;
 - (iv) A high level overview of the consultants, Amec Foster Wheeler, report which had been commissioned in 2014/15;
 - (v) The revenue operating cost of each site and the savings that could be delivered through site closures;
 - (vi) The criteria applied to identify sites for closure.
8. The Panel also requested and received further information on the following:
 - (vii) Budget/running costs for each individual RHWS;
 - (viii) Staffing numbers and costs for each RHWS;
 - (ix) Corporate complaints and user satisfaction surveys data relating to RHWS;
 - (x) Income generated from RHWS;
 - (xi) Fly-tipping;
 - (xii) Agreements under Section 106 of the Town and County Planning Act 1990 relating to the Lutterworth RHWS.
9. The Panel was supported in its review by the following persons and is indebted to them for their contributions:

Joanna Guyll	Assistant Director – Environment and Waste
Vicky Cormie	Head of Service – Environment and Waste Commissioning
Nigel Shilton	Head of Service – Waste Management Delivery
Euan Walters	Senior Democratic Services Officer
Joanne Twomey	Democratic Services Manager

Background Information

Legal Duties

10. In Leicestershire, waste is managed across two tiers of local government. The district councils are Waste Collection Authorities (WCAs) who arrange for waste and recycling to be collected from residents' homes. The County Council is a Waste Disposal Authority (WDA) and so provides sites for the WCAs and residents to deliver their waste and recycling.
11. The Environmental Protection Act 1990 requires the County Council as a WDA to provide residents in its area with '*reasonably accessible*' sites at which a resident can deposit their household waste '*free of charge*', and to then carry out the disposal of that waste. Other than requiring that sites are situated either within the area of the authority, or so as to be reasonably accessible to residents in its area, the Act does not provide any further guidance on what WDAs are required to provide. There is, for example, no specified minimum number of sites or mandatory opening times, although they must be open for part of either a Saturday or Sunday. It is also worth noting that there is no obligation on a WDA to accept waste other than household waste delivered by Leicestershire residents for free.

Leicestershire Resources and Waste Strategy 2022-2050

12. Under the Waste and Emissions Trading Act 2003, all authorities in two-tier areas are required to have in place a Joint Municipal Waste Management Strategy for the management of municipal waste within their area. The Leicestershire Resources and Waste Strategy 2022-2050 was developed in partnership with the seven district councils in Leicestershire and sets out how they through the Leicestershire Waste Partnership intend to manage municipal waste in the period up to 2050.
13. A [public consultation on the draft Strategy](#) was undertaken in early 2022 and the Strategy was subsequently approved by the County Council's Cabinet on 24 April 2023. Over 5,000 responses were received to the public consultation and whilst levels of satisfaction with the Council's RHWS were generally high, as reported to the Cabinet in April, there were some respondents who raised concerns regarding short opening hours, too few sites and inaccessibility.

Guidance on minimum provision for WDAs

14. In the absence of a nationally recognised position, the National Assessment of Civic Amenity Sites (NACAS) report written in 2004 is the seminal publication on acceptable levels of RHWS operations. This is still considered relevant for benchmarking purposes. The updated Household Waste Recycling Centre (HWRC) Guide produced by WRAP (2018) is still based on this original report. Whilst individual WDAs are able to reach their own conclusions in terms of what should be provided, the NACAS report recommends maximum catchment radii for RHWS of three miles in urban

areas and seven miles in rural areas covering the great majority of residents. The maximum driving times to a site for the majority of residents should be 20 minutes in urban areas and 30 minutes in rural areas.

15. It should be noted that the recommendations made in the NACAS report are not legally binding.

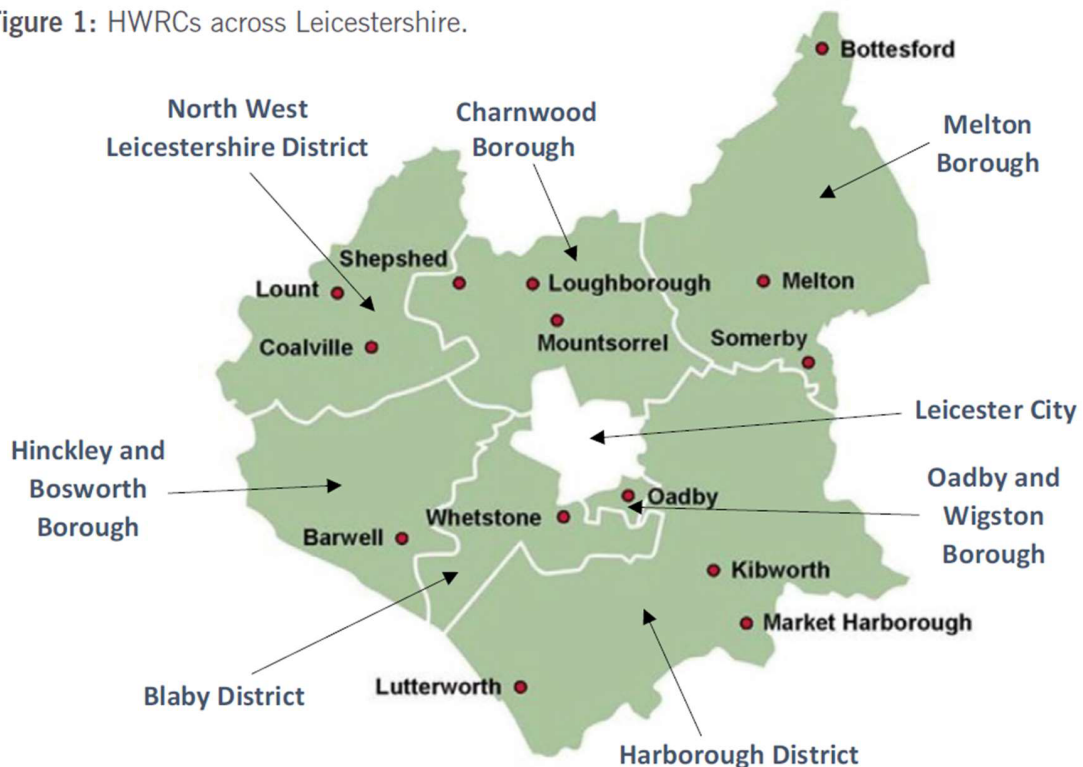
The current RHWS Service in Leicestershire

Location

16. There are 14 RHWS located across Leicestershire, all of which are directly operated by the County Council. These sites are located in the following areas and as shown on the map below:

- Barwell
- Market Harborough
- Bottesford
- Melton
- Coalville
- Mountsorrel
- Kibworth
- Oadby
- Loughborough
- Shepshed
- Lount
- Somerby
- Lutterworth
- Whetstone

Figure 1: HWRCs across Leicestershire.



Opening Times

17. In 2015, the Cabinet approved the current service offer for all Leicestershire RHWS. A single service approach was adopted meaning that all sites are open the same number of hours (in the summer 9am to 7pm, and in the winter 9am to 4pm), five days per week (all sites to be open at weekends and Mondays, and a proportion of sites to remain open each day for use by the public in the week), apply the same charging levels for some non-household waste and mainly accept the same waste types (where economically and practically feasible).
18. The Panel noted that, due to staffing pressures during and following the Covid-19 pandemic, not all sites have reopened in line with the above agreed service offer. For example, at the time the Panel met Bottesford and Somerby were open 2 days per week and Shepshed 3 days per week (Bottesford has since increased to 3 days per week). However, the intention is to return to the Cabinet agreed level of service when circumstances permit. The savings identified and detailed in the MTFS 2023/24 – 2026/27 as set out below have therefore been calculated on that basis (i.e. based on the agreed current service offer as budgeted for within the MTFS, not the current opening hours of some sites which is only temporary).

Leicestershire RHWS Service Review 2015

19. Since 2013 the RHWS service in Leicestershire has undergone a period of significant change and already delivered savings of over £2.7million.
20. In 2014/15, external consultants Amec Foster Wheeler (AFW – now part of Wood Plc) were commissioned by the County Council to carry out an independent assessment of Leicestershire RHWS services in order to meet the Council's then MTFS target to reduce operating costs whilst maintaining, as far as possible, the then standard of service across the County.
21. A number of options were presented by AFW for consideration, and since 2015 a number of its recommendations have been implemented (following public consultation and approval by the Cabinet) to shape the service currently offered and as outlined above. These include:
 - Reducing site opening times – Five day opening all year at all 14 RHWS implemented (as opposed to seven days per week April to September and five days per week October to March).
 - Refreshing and updating the Council's permit regime for certain vehicles and some types of waste – This restricts certain vehicle types and the types of waste and volume of waste deposited (e.g. inert waste, plasterboard and paint that can be disposed of), by the public, charities and parish councils.

- Charging for non-household waste - Whilst WDAs cannot legally charge residents for household waste, they can charge for some types of non-household waste and the County Council introduced charges (currently £3 per tub) for items such as concrete, bricks, rubble, glass windows, slabs and plasterboard.
 - Bringing operational running of sites in house - At the time AFW carried out its assessment, the Whetstone site was operated by Suez Environmental Ltd and the remaining sites were operated by EWC Ltd. In July 2017 13 sites were brought under the operation of the County Council. During April 2021 the Whetstone RHWS and WTS were brought in-house.
22. AFW also considered the potential for site closures, restricting out of county residents from accessing Leicestershire RHWS and site sharing with neighbouring authorities. As part of the 2015 review these options were not progressed. The basis of AFW’s proposals regarding site closures do, however, now form the basis of the proposals for the delivery of the Council’s current MTFs savings target, as detailed below.

Current RHWS budget and MTFs Savings proposals

23. The current total operational budget for Leicestershire’s waste management service in 2022/23 was £28.9m and the current net budget for the operation of all 14 RHWS is c. £4.16m (excluding waste disposal and treatment costs).
24. The MTFs 2023/24 – 2026/27 approved by the County Council in February 2023 includes a planned savings target for the service of £150,000 to be delivered in 2024/25, increasing to £580,000 in 2025/26 and 2026/27, as shown in the table below.

Ref.	Saving	2023/24	2024/25	2025/26	2026/27
ET17a	Reduce Summer opening hours - all sites	£0	£0	£150,000	£150,000
ET17b	Closures of RHWS 5 sites	£0	£150,000	£430,000	£430,000
Total ET17	Review RHWS service provision	£0	£150,000	£580,000	£580,000

The savings detailed in the table above assume:

- *ET17a - summer opening hours reduced across all 14 sites from April 2025 resulting in savings of £150,000 from 2025/26 onwards.*
- *ET17b site closures start from October 2024 (during winter opening hours) resulting in a part year saving of £150,000; this increases in 2025/26 as the full year effect is achieved.*

- *The saving in ET17b assumes the reduction in opening hours has already been accounted for and the saving for all sites is shown as part of the ET17a line.*
25. The potential to deliver this level of saving is based on AFW's recommendation for the Council to move away from a single service approach and to instead consider the implementation of a key network principle with a three tier system of RHWS as follows:
- Primary sites – essential sites
 - Secondary sites – sites that are desirable to retain if financially viable
 - Tertiary sites – sites that are prime candidate for closure as they predominantly serve out of County residents or have significant overlap with primary or secondary sites
26. AFW's recommendation was based on its findings that:
- there are significant levels of cross border use;
 - site provision (properties per site) is currently above average, both locally and nationally;
 - the abundance of sites is encouraging ineffective patterns of use (high frequency of visits with low volumes of waste);
 - tonnages received at sites is decreasing;
 - restrictions on non-household waste are becoming ineffective;
 - the scope to deliver savings by improving diversion from landfill is limited.
27. AFW identified the sites it would allocate as either Primary, Secondary or Tertiary based on data available at that time and these have largely remained unchanged when considering the current savings proposals.

Primary Sites	Whetstone Melton Mowbray Kibworth* Mountsorrel Coalville Barwell
Secondary Sites	Oadby Loughborough Lount
Tertiary Sites	Shepshed Bottesford Market Harborough* Somerton Lutterworth

** AFW concluded that the Market Harborough and Kibworth sites should be considered in tandem due to the overlap in service coverage. They placed*

Market Harborough in the Primary category and placed Kibworth in the Tertiary category. However, subsequent to the AFW report the Kibworth site has reopened following redevelopment, therefore Kibworth is now considered to be a Primary site and Market Harborough to be a Tertiary site.

28. To deliver this level of MTFs savings the proposals as considered by the Panel are to reduce the number of RHWS from 14 to 9, with five day opening (44 hours per week in summer, 35 hours per week in winter). Delivery of such savings is, however, based on the following assumptions:
- Implementation will be from October 2024;
 - Savings will result from staff reductions (17 FTE) and reductions in machinery, maintenance costs, engineering and utility bills;
 - Any decrease in recycling or other income will be offset by a drop in residual waste tonnages received
 - There will be a one off implementation cost of at least £325,000- £375,000 (inc. project management, redundancy, decommissioning of sites, communication, staff training etc);
 - Sites are mothballed (partially decommissioned) but retained;
 - An average 37 hour week for site staff is maintained.

The Panel's Considerations

29. The Panel has been tasked with considering the criteria applied to determine the prioritisation of RHWS for closure that will deliver the identified maximum level of savings as contained within the current approved MTFs detailed above and to give its views on the potential impacts if progressed.
30. The criteria applied by officers in developing the proposals and now considered by the Panel in turn are:
- Finance
 - Ongoing operational deliverability
 - Catchment areas (inc. cross boundary use)
 - Site usage patterns
 - Housing growth
 - Site infrastructure / suitability
 - Legal compliance
 - Implementation timescales
31. The Panel has been advised that the following criteria have not been considered in developing the proposals:
- Drive time (because this would be too costly and time consuming to produce)
 - Detailed analysis of highway impacts

- Service user views (although a formal public consultation will be undertaken once final proposals have been developed).

Finance

32. The Panel considered the overall summary of savings for all sites identified for closure along with the changes in summer opening hours across all sites. The estimates made are as set out in the table below.

Saving Item	Staff saving FTE	Net staffing saving	Net non-staffing saving	Total
Reduction in Summer opening hours all sites	5	£150,000	£ -	£150,000
Shepshed Closure	2.5	£ 75,000	£16,000	£ 91,000
Somerby Closure	2	£ 60,000	£10,000	£ 70,000
Bottesford	2	£ 60,000	£10,000	£ 70,000
Lutterworth	2.5	£ 75,000	£14,000	£ 89,000
Market Harborough	3	£ 90,000	£20,000	£110,000
Totals	17	£510,000	£70,000	£580,000

33. The estimates are based on a number of key assumptions including:
- That the majority of savings will be from reducing staffing numbers (the biggest overhead).
 - Based on current usage patterns, the five site closures could impact 18.4% of visits (based on 19/20 figures) and 16.5% of tonnage deposited.
 - 65% of the waste taken at the RHWS currently goes through six sites (18% going through Whetstone alone).
 - Most waste will go to a different open RHWS.
 - Any loss of recycling sales income will be offset by a reduction in residual waste (e.g. out of county/trade).
 - Haulage cost impact is neutral (there may be some small fuel savings but this has not been costed).
 - Closed sites would be mothballed (i.e. made dormant so basic maintenance and inspections would be undertaken with utility connections and environmental permits retained).
 - Additional wear and tear on compaction machines would be offset by using parts from machines at mothballed sites and relocating machines to nearby sites if required/appropriate.
34. The Panel considers that the assumptions made are reasonable and that the savings target could be met if the proposal to close all five identified tertiary sites is implemented. However, there are risks associated with the precise level of savings that might be delivered. These are associated with the timing of delivery and the uncertainty over future demand levels once changes are implemented which could impact staffing level requirements at other sites.

35. The Panel feels that the required public consultation will assist in helping to identify the effects of the proposed closures, but until they are implemented and have been in place for a period of time it is not possible to know precisely what impact they will have in terms of overall visitor numbers and tonnage that pass through the waste management system.

Income Generation

36. Taking account of the legal restrictions around charging for household waste, the Panel recognises that since 2015 the Council already charges for non-household waste (e.g. concrete, bricks, rubble, glass windows, slabs and plasterboard) collected at its RHWS and that the main benefit/saving from this scheme is achieved by disincentivising unauthorised (and illegal) trade waste from being deposited.
37. Whilst the Panel noted that a separate project to increase income through reuse is already in the MTFs with £160,000 saving identified, it sought to understand the amount of income generated and challenged to what extent this could be increased given there is a private market for some materials (e.g. scrap metal). Having considered the data, the Panel accepts there is little scope for this. The value of materials is heavily affected by the markets and the Council would be unable to realistically compete with the private sector which is better able to adapt to unpredictable fluctuations in demand and prices. The Council would be at risk of having to halt operations if and when it stopped being cost-effective due to sudden price changes which would cause confusion with residents about whether services were available or not.
38. The Panel further recognises that the Council is not equipped to proactively seek to collect such material (waste collection being a district council responsibility) and so would be reliant on what is deposited on site by residents from time to time, which would likely reduce as prices rise.
39. The Panel further acknowledges that to offset the savings target, or even a proportion thereof, income from such operations would need to rise and remain at record high levels.

Ongoing operational deliverability

40. The Panel notes that when considering the criteria applied in the RHWS review, a whole service approach has first been taken, and then focus given to each individual site. This process has been applied to ensure the delivery of maximum savings whilst maintaining the overall viability of the service across those sites that would remain. However, the Panel has questioned whether a more nuanced approach could be taken.
41. The Panel challenged whether the £580,000 savings target could be achieved by making smaller changes to more/all of the sites therefore potentially

avoiding some or all of the proposed closures. For example, by reducing the opening hours across all sites more than is currently proposed during the summer. The Panel questioned whether this would be more equitable in spreading the impact of the savings identified.

42. The Panel has heard, however, that such an approach would likely result in all sites only being open 4 days per week and this would have a number of negative impacts on the service overall. It would reduce capacity and access to the service (including the potential for queuing on the highway) for more residents overall if primary and secondary sites e.g. Whetstone, were open 4 rather than 5 days per week, given the current higher frequency of usage of these sites. It would also result in an entirely part time workforce which would further impact existing recruitment and retention problems. The Panel has heard how some sites are already open on a reduced hours basis due to the inability to recruit staff (e.g. Bottesford, Somerby and Shepshed). The Panel also accepts there are limits due to health and safety requirements in terms of the minimum number of staff required to keep a site open (as well as costs relating to machinery and site maintenance etc) that would limit the extent to which changes can be made in this way.
43. The Panel therefore recognises the argument that the level of savings identified cannot be delivered by further 'top slicing' services at each site (this already having been done as part of the 2015 review). To adopt such an approach would require a reduction in the level of savings to be delivered to ensure the service remained viable.

Catchment areas (including cross boundary use)

44. The Panel looked at the number of RHWS provided by neighbouring authorities compared to the geographical area covered, the number of households per site, the percentage of waste recycled and tonnage of waste deposited. This demonstrated that Leicestershire currently offers an above average service in terms of the number of sites, the number of residents per site and households per site provided for, when compared to the local average (see Appendix A). The Panel acknowledges that this suggests there was some scope to reduce service provision whilst retaining good coverage. However, it also recognises that the proposals to close five sites could have a disproportionate impact on particular areas of the County. The Panel therefore was keen to understand to what extent the closures might affect its legal obligation to provide a 'reasonably accessible service' in those areas.
45. The Panel specifically sought more information on AFWs findings regarding RHWS facilities and population covered by district area.
46. The Panel assessed Leicestershire's current catchment provision across a five mile radius and a seven mile radius and compared this with the expected coverage if all five tertiary sites were to be closed. The maps attached as Appendices B to E demonstrate the difference that would result. The Panel

considered that overall, reasonable if not good coverage would be retained for all of the County but raised concerns about the apparent isolation of north Melton if the Bottesford site were to be closed.

47. It is worth noting that the Panel (and AFW previously) has used a five and seven miles radius to consider the accessibility of Leicestershire's RHWS services (not the NACAS guidance which refers to a three and five mile radius for urban and rural areas respectively) which is deemed more suitable to the County's urban/rural mix. This is because the majority (four) of the seven districts using the WRAP classification are classed as rural, two are classed as mixed urban/rural (Charnwood and Blaby) and one (Oadby and Wigston) is classed as urban (which is less than 10% of the County's households and only 1% of the County's geographic area).

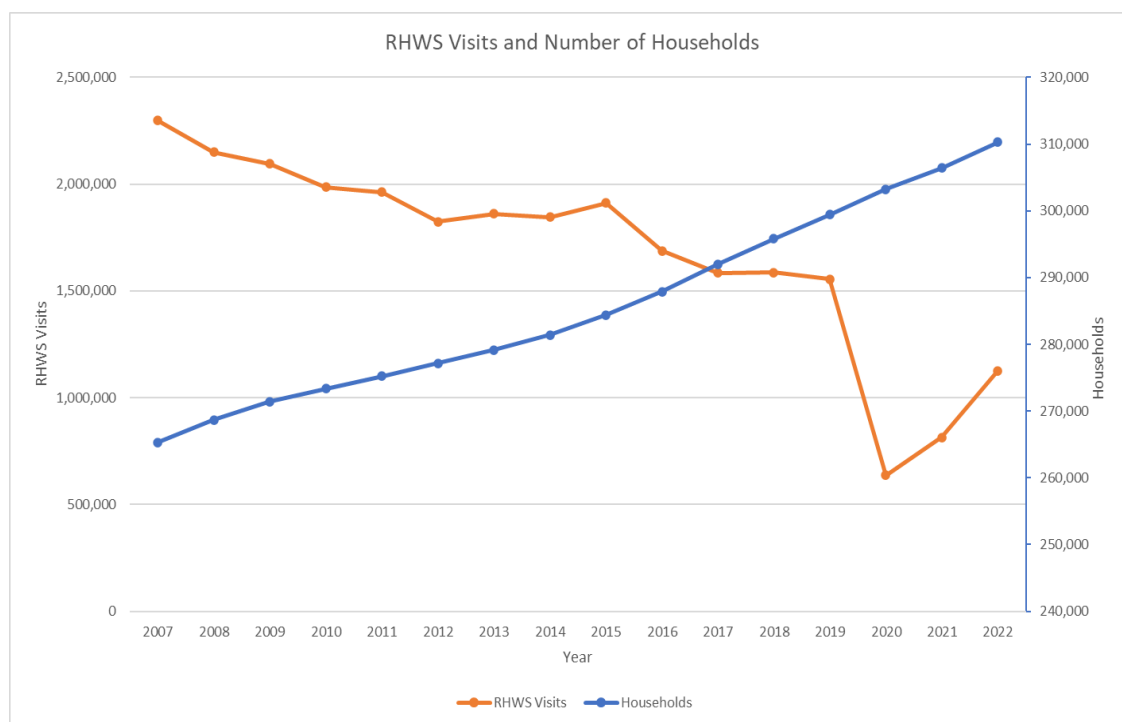
Cross boundary use

48. The Panel considered postcode data collected in 2017 as part of a user satisfaction survey across all RHWS in Leicestershire which indicated that whilst the vast majority of users of the Council's sites did live in Leicestershire, a proportion did not (see Appendix F). However, it feels that the extent of the data collected does not necessarily provide a clear picture on this point and so has not given this too much weight in its considerations. For example, 12% of respondents refused to give their postcode or gave an incorrect postcode.
49. The Panel has taken account of the fact that restricting access for out-of-county residents was considered by the Cabinet in 2015, but not taken forward because it was concluded that the costs and practicality of a mechanism to differentiate between Leicestershire and non-Leicestershire residents and the potential impact on the operation of sites of effective monitoring would be likely to outweigh any financial benefits.
50. The Panel has also heard that anecdotal evidence suggests the amount of waste from out-of-County that is coming into Leicestershire RHWS could be roughly equivalent to that which is going out-of-county and that there is therefore limited merit in preventing waste from crossing the County border at this time, as it may not result in a net improvement.
51. The Panel acknowledges the conclusions drawn both now and in 2015, and cautiously agrees with the assumptions being made in this regard but is of the view that this position might have to be reconsidered in the future should bordering authorities start preventing Leicestershire residents from using out-of-county waste sites. This has been done directly by Nottinghamshire County Council and indirectly (through the use of a booking system) by Warwickshire County Council.
52. Importantly, when assessing whether the number and geographical spread of RHWS across Leicestershire is sufficient for its residents, the Panel notes that

account has not been taken of nearby sites across the county border. The Panel supports this approach and wishes to emphasise that in undertaking this review, the Council must focus on whether it is providing sufficient RHWS for its residents and should not rely on what neighbouring authorities are offering. Particularly as 4 of the 5 sites proposed for closure are very close to the Leicestershire border.

Site usage patterns and costs

53. Since 2007 the overall number of visits to the Council's RHWS has gradually fallen year on year (see graph below). This is despite the number of households increasing over the same period. Recent data shows that between November 2021 and October 2022 a total of 1,128,113 visits were made to Leicestershire's RHWS. This compares to 1,522,732 visits in 2019/20. Data for November 2022 to date is not yet available.



54. The total tonnage received at all the RHWS is also decreasing, though this is less so than for visitor numbers. In 2009/10, a total of 71,898 tonnes of household waste was received at the Council's RHWS compared to 54,845 tonnes in 2019/20. For the years 2020/21 and 2021/22 the tonnage was much lower due to the Covid-19 pandemic and the data for 2022/23 is not yet available.
55. The Panel considered data on the tonnage of waste deposited and the visitor numbers on a site-by-site basis. Members also considered the cost per visit and net cost per tonne of waste (as shown in the table below).

Site name	2022 Site Prioritisation	Tonnage 2019/20 (All exc trade)	Total Visits 2019/20	Average Visits per hour open	Cost per visit (exclude disposal and overheads)	Net Cost per tonne (Recycling Income, handling and haulage but excludes waste treatment/Disposal)	Total net handling haulage and recycling (but exc disposal and overheads)
Whetstone RHWS	Primary Sites	9,965	208,710	90.2	£1.16	£24.22	£ 241,318
Coalville RHWS	Primary Sites	4,970	128,330	58.7	£1.37	£35.25	£ 175,200
Barwell RHWS	Primary Sites	5,261	144,358	67.7	£1.48	£40.69	£ 214,054
Mountsorrel RHWS	Primary Sites	5,534	155,028	72.2	£1.54	£43.05	£ 238,230
Kibworth RHWS	Primary Sites	3,367	90,592	40.6	£1.83	£49.21	£ 165,698
Melton Mowbray RHWS	Primary Sites	3,502	111,864	49.6	£2.01	£64.23	£ 224,905
Lount RHWS	Secondary Sites	3,486	105,399	49.6	£1.27	£38.43	£ 133,955
Oadby RHWS	Secondary Sites	5,558	180,952	85.7	£1.47	£47.70	£ 265,122
Loughborough RHWS	Secondary Sites	4,146	117,440	54.1	£1.56	£44.13	£ 182,993
Market Harborough RHWS	Tertiary Sites	3,386	113,612	54.1	£1.61	£54.02	£ 182,949
Shepshed RHWS	Tertiary Sites	2,172	62,568	31.6	£2.23	£64.22	£ 139,511
Lutterworth RHWS	Tertiary Sites	2,218	62,732	22.6	£2.53	£71.55	£ 158,653
Bottesford RHWS	Tertiary Sites	902	29,925	13.5	£3.55	£117.59	£ 106,099
Somerby RHWS	Tertiary Sites	376	11,222	4.5	£8.07	£240.58	£ 90,556
		54,845	1,522,732				

56. The Panel is concerned to emphasise that providing less capacity for residents is something all Members seek to avoid. However, to deliver the level of savings currently identified, the Panel was satisfied that based on the usage figures considered (both in terms of the number of visits and tonnage of waste deposited) those sites that would have the least impact on Leicestershire residents if closed were Bottesford, Somerby, Shepshed (all of which were currently only open part time) and Market Harborough.
57. The Panel is, however, less satisfied that the threshold for the possible closure of the Lutterworth RHWS has been met as explained below.
58. The Panel also has concerns that whilst having lower usage levels, given the isolated location of Bottesford, residents in the rural area to the north of Melton could be more unreasonably affected.
59. In relation to the cost per tonne and cost per visit, the Panel noted that the tertiary sites, with the exception of Market Harborough, were the least cost-effective sites to run. Members also noted that although Melton RHWS was also comparatively expensive, this site was not being considered for closure due to its location within the County.

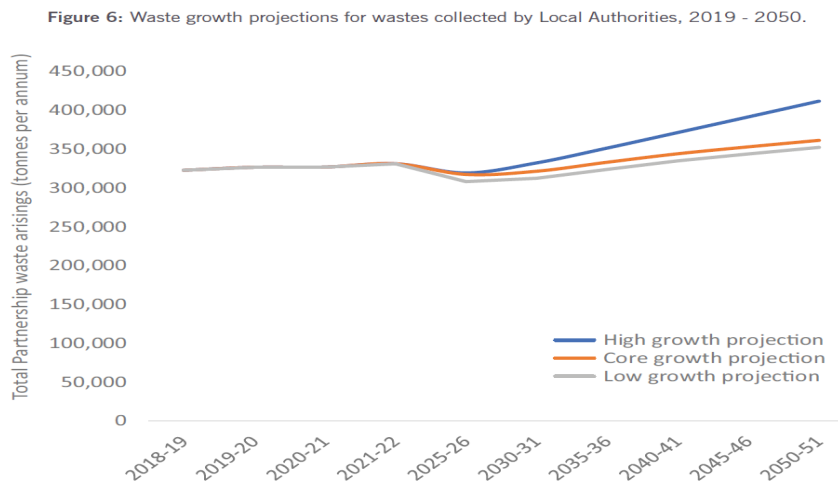
Housing growth

60. FW used the 2013/14 figures for the number of households in Leicestershire when producing its report. Since then there has been a large amount of housing growth in Leicestershire and more expected.
61. The Panel considered the forecasted housing growth figures across each district from 2013 up to 2043, taking account of the number of RHWS currently within each district boundary. As shown in the table below, projections suggest on average a 37% increase in households during this period across the County.

District Council Area	No. of RHWS in boundary	2013	2023	2033	2043	% change 2013-2043
Blaby	1	39,258	45,286	50,846	55,639	42%
Charnwood	3	67,901	77,488	86,548	93,903	38%
Harborough	3	35,724	41,066	45,911	50,063	40%
Hinckley & Bosworth	1	46,060	52,931	58,800	63,833	39%
Melton	3	21,720	22,965	24,113	25,202	16%
NW Leicestershire	2	39,557	47,154	54,365	60,531	53%
Oadby & Wigston	1	21,270	21,049	21,912	22,976	8%
Totals	14	271,490	307,940	342,494	372,146	37%

** Figures drawn from the Office of National Statistics Website (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>)*

62. The Panel is concerned to note, that for some districts the percentage is higher, namely for Harborough which is forecast to grow by 40% by 2043 which appears to counter the proposal that the Lutterworth site be designated 'tertiary' and therefore at risk of closure.
63. The Panel were keen to understand what impact the forecasted rise in households was expected to have on waste growth projections and whether considering site closures at all, and specifically in relation to Harborough, would be counterproductive to meeting future need.
64. The Panel notes that the core growth projections set out in Section 4 of the Leicestershire Resources and Waste Strategy 2022-2050 (see graph below) indicate that waste does not rise at the same level as housing growth. Past data similarly shows that since 2013, whilst household numbers have risen, waste levels and visitor numbers to RHWS have fallen (see paragraph 53 above).



65. The Panel has been reassured by the information provided that there does not appear to show a direct link between the amount of housing and RHWS visitor numbers. Nevertheless, the Panel remains concerned about the potential closure of the Lutterworth site. Particularly now that planning permission has been granted for the Lutterworth East Strategic Development Area (SDA) which will provide for the building of a further 2,750 houses in this area over the next decade.
66. The Panel feel that whilst this development could not have been anticipated by AFW when conducting its work in 2014/15, such a large scheme requires further consideration as part of this RHWS review. The closure of the Lutterworth site could potentially result in residents relying on sites across the County border in Rugby (something the Panel agreed should not be relied upon when considering its own service levels – see paragraph 52 above) or having to travel approximately 10 miles to the next closest site in Leicestershire (Whetstone). Added travel by the current number of residents using Lutterworth which was still relatively high compared to the other tertiary sites would have consequential impacts on road usage and the environment.
67. Whilst drive time has been one of the criteria excluded as part of the RHWS review, the Panel feel in this instance this should be something taken into consideration. A NACAS recommendation suggests a maximum driving time to a site for the ‘great majority of residents’ of 20 minutes in urban areas and 30 minutes in rural areas. For example, drive times from Lutterworth to Whetstone RHWS are estimated to be c. 17-25 minutes (subject to the time of travel). However, it was noted that the County Council does not have a policy on maximum drive time or distance for residents to get to a RHWS.
68. Similarly, the Panel raised concerns about the possible impacts of the Melton Local Plan and the North and Eastern sections of the Melton Mowbray Distributor Road (NEMMDR) Scheme on the waste disposal requirements for that area, noting the two sites (Bottesford and Somersby) proposed for closure.

69. The NEMMDR is a fundamental element within the Melton Local Plan which identifies some 100 hectares of land for the delivery of the Melton North Sustainable Neighbourhood (MNSN) which will help to deliver some 1,700 houses.
70. The Panel has concerns that whilst the needs of residents using the Somerby site could be easily met by them using the Melton RHWS with little added travel time, this did not look to be the case for Bottesford. The Panel notes that to travel from Bottesford to the current Melton Mowbray RHWS by car is approximately 30 minutes each way (just meeting the NACAS guidance for rural areas). The Panel is concerned that housing growth to the north of Melton could affect future need for this site, at least in the short term, noting that the Melton Mowbray RHWS is a smaller site with little room for expansion.
71. Whilst the Panel recognises that Bottesford is currently one of the more costly sites to operate, it is of the view that its possible closure may need further consideration and that at some stage an overall review of the RHWS needs in Melton will be required as the Melton Mowbray Local Plan and the NEMMDR bring forward the expected housing growth in this area.

Site infrastructure / suitability

72. The Panel has considered whether closing some sites would lead to the remaining sites being overwhelmed with visitors. The Panel received assurances that the remaining sites had the capacity to cope with the expected increase in demand, but the Panel still has concerns about the access routes to these sites and whether the surrounding roads can cope with the increased traffic, particularly if this results in queuing on the highway at peak times or if demand rises.
73. The Panel has particular concerns regarding access to the recently refurbished Kibworth site if the site in Market Harborough were to be closed. Whilst the Panel is reassured that Kibworth has capacity to take the likely increased waste it is not convinced that the surrounding roads will be able to support this. It has been suggested that access to the site which is located directly off the busy A6 road (with a speed limited of 60mph) can already be difficult. The Panel feels that this is something that will need further consideration to ensure increased traffic to the Kibworth site has been duly accounted for.

Legal compliance

74. The Panel heard about the legal obligations placed on the County Council as the Waste Disposal Authority and notes that even if all five tertiary sites were to be closed the Council would still be operating in line with the requirements set out in the Environmental Protection Act (as detailed in paragraph 11 above).

75. However, the Panel is conscious that changes in legislation and regulations could potentially lead to more demand to use the Council's RHWS. A recent example being the Waste Upholstered Domestic Seating (WUDS) change which applied from 1st January 2023 and introduced an extra waste stream requirement at each site, as well as extra costs.
76. The Panel has also heard about the substantial reforms to municipal waste collection and management services, including requiring the separate collection of food waste from households. The Government is requiring (through the Environment Act 2021) all households to have a separate collection of food waste, on a weekly basis, from the mid 2020's.
77. New measures proposed include Extended Producer Responsibility for packaging materials and the introduction of a deposit return scheme (DRS) for single use drinks containers. These measures are likely to have a significant impact on the services delivered in Leicestershire and who pays for them.

Other factors also raised and considered by the Panel

Fly-tipping

78. The Panel considered whether the amount of fly-tipping in Leicestershire will likely increase if some RHWS are closed and residents required to travel further to alternative sites.
79. Research carried out by WRAP in 2021 compared fly tipping rates between local authorities that charge and do not charge for DIY type waste at RHWS and found that this did not result in increased fly tipping. WRAP found that the variables that have a significant association with fly tipping are:
 - Deprivation – fly tipping rates increase with deprivation;
 - Urban-Rural Classification – areas classified as 'Urban with Major Conurbation' have higher fly tipping rates than other areas.
80. The Panel has been reassured that there is not a direct correlation between the availability of RHWS and the location of fly-tipping, and that the prevalence of fly-tipping is influenced by other factors such as the amount of enforcement action in a particular area.
81. Nevertheless, the Panel is concerned that residents could unknowingly employ third parties to dispose of their waste who could in turn fly-tip this waste without the resident knowing. The Panel considers that this issue could be dealt with through communications to the public providing information around rogue waste collectors if and when any proposals are brought forward.

Recommendations and Conclusions

The Panel makes the following recommendations:

(i) That the criteria applied to prioritise sites for closure be supported.

The Panel is satisfied that the criteria used for identifying sites for closure are adequate and data collected and presented to the Panel to provide assurance that this part of the process has been robust has been detailed and thorough.

(ii) That any future public consultation on proposals for RHWS services be clear and concise to encourage public interest and response levels and that as part of the consultation resident's views be specifically sought on the likely impact of increased distance and travel time to an alternative site where a closure is proposed.

The Panel is concerned that a lengthy and over complicated consultation will reduce public interest and the number of responses received which would be detrimental to understanding residents views and the effects of the proposals in practice. Whilst supportive of a standard consultation approach, the Panel is keen to see this kept short and easy to access and navigate.

The Panel is of the view that greater consideration could have been given to the impact on residents of increased drive time to an alternative RHWS resulting from the five proposed site closures. The reasons for excluding this criteria is well founded, focus having been given to usage, but the Panel feels that this is the key area where the public will most likely be impacted by the proposals. The Panel has sought to give some degree of consideration to this as part of its review but suggests that this could best be addressed through the consultation process.

(iii) That the proposal to re-categorise the Market Harborough and Kibworth sites to a tertiary and primary site respectively be supported.

The Panel notes that the 2014/15 report from AFW categorised Market Harborough as a Primary Site and Kibworth as a Tertiary Site, but the Panel accepts that due to the redevelopments that have taken place at Kibworth this site should now be categorised as a Primary Site. The Panel does not believe that requiring residents to deposit their waste at Kibworth rather than Market Harborough will result in much difference in travelling time for the majority of residents.

(iv) That, based on the usage data presented the proposal to consult on the possible closure of those sites at Shepshed, Somerby, and Market Harborough which have been categorised as 'tertiary sites' be supported.

The Panel recognises that the potential closure of these sites, based on the data presented will have the least impact on Leicestershire residents overall and those living near to these particular sites.

Analysis from the RHWS review shows that 91.2% of households currently have access to a site within a five mile radius from their property and 99.7 % are within seven miles. The proposed reduction in the network as a result of all five closures would mean that 86.3% of households will still have access to a RHWS within a five mile radius from their property (95.5% within 7 miles).

If these three sites are put forward for closure, then the percentage of household coverage will increase from 86.3% to 89.6% within a five mile radii and from 95.5% to 98.9% with a seven mile radii.

The tertiary sites account for the following tonnages and user visits:

Tertiary Site	2019/20 Tonnage	% of overall tonnage	2019/20 visits	% of overall visits
Bottesford RHWS	902	2%	29,925	2%
Lutterworth RHWS	2,218	4%	62,732	4%
Market Harborough RHWS	3,386	6%	113,612	7%
Shepshed RHWS	2,172	4%	62,568	4%
Somerby RHWS	376	1%	11,222	1%
Total	9,054	17%	280,059	18%

These three sites also account for only 11% of the overall tonnage of waste received in Leicestershire receiving in general a total of 12% of all RHWS visits in 2019 (pre-Covid), they are also the most costly to operate (except for the Market Harborough site). As a general rule the smaller a site the less cost effective it is per visit or per tonne handled.

The Panel has sought to test all other options which might avoid these proposed site closures and to essentially more evenly spread the hardship this might cause. However, the Panel recognises that this is not possible without affecting the overall viability of the RHWS service and negatively affecting more Leicestershire residents.

- (v) **That the proposed closure of the Lutterworth RHWS be reconsidered (whether on a reduced opening hours basis or otherwise), noting that this could reduce the amount of MTFs savings to be delivered up to £90,000.**

The potential closure of the Lutterworth RHWS gives the Panel the most cause for concern as it considers that this will have a greater impact on residents than the closure of any of the other sites put forward, in particular in

terms of travel time to the next nearest Leicestershire site and the risk of future increased demand.

The Panel does not give a view on the extent to which the site should remain open. The Panel has discussed the potential for this to be on a reduced hours basis. However, the Panel has not been able to consider any data to assess whether or not this would be viable.

The Panel notes the data presented in support of possible closure, and notes that increases in housing does not directly result in increased waste disposal. However, it feels there is much uncertainty in this particular location following the granting of planning permission for the Lutterworth East SDA (2,750 extra homes) which could affect future demand which is not as low in Lutterworth as seen across the other sites put forward for closure.

The Panel was also not satisfied with the possible need for residents to rely on an out of County site in Rugby to avoid a journey of around 10 miles which is above the NACAS recommended maximum of three miles in urban areas and seven miles in rural areas.

The Panel is also aware that as part of the Lutterworth East planning application, some £200,000 developer contributions have been sought through section 106 planning agreement to support improvements to this site.

- (vi) That further consideration be given to the potential closure of the Bottesford RHWS and if possible an alternative solution found which might allow the site to remain open on reduced hours (as is the case already), noting that this would reduce the level of MTFs savings to be delivered.**

The Panel recognises that Bottesford is one of the most costly sites to operate and that the number of visitors and tonnage of waste it receives is low compared to the primary and secondary sites. However, it did note that the data around usage provided was not up to date and so would require more detailed assessment.

The Panel is concerned that Bottesford RHWS is the only site to the north of Melton and given its isolated location, if closed, will have a greater impact on residents living in that area, although few in overall numbers. It will result in those residents being reliant on either an out of County site or having to travel around 16-18 miles to the Melton RHWS.

As with the Lutterworth RHWS, the Panel does not give a view on the extent to which the site should remain open as it has not been able to consider any data to assess what might be viable.

- (vii) That the impact of the North and Eastern sections of the Melton Mowbray Distributor Road Scheme on waste disposal requirements in Melton Mowbray be kept under review.**

The Panel is concerned about the unknown future need for RHWS in Melton and reliance being placed on the current Melton RHWS if Bottesford as well as Somerby were to be closed. The current Melton RHWS is small with limited potential for expansion and the Panel is therefore of the view that in time this will need to be reconsidered. The Panel notes that the Melton RHWS is earmarked for future replacement (subject to identification of a suitable site and the provision of capital funding) and suggests that sites in Melton be looked at further as the impact of increased housing becomes clearer.

- (viii) That a highways assessment be carried out in relation to access to the Kibworth RHWS if the site in Market Harborough is put forward for closure.**

The Panel feels that further assurance is needed to address concerns in respect of this particular site if traffic is likely to increase as a result of the Market Harborough site being closed. The speed limit on the access road and the added strain on the junction and access to the Kibworth site, which is located on a 60mph road, is thought to already be under some pressure.

- (ix) That if any sites are closed, that initially plans to decommission but not sell sites be supported.**

The Panel notes that no decisions have been made on whether closed sites would be sold or whether the sites would be retained by the County Council. The current savings assume sites are in effect decommissioned but not immediately sold and so could be re-mobilised with around six months' notice.

It considers that any potential site sale should be considered carefully after a reasonable period of time, as circumstances and/or regulations could change which might affect Leicestershire's RHWS requirements. The Panel recognises that retaining sites but not using them still results in a cost to the County Council and that reopening sites would be difficult and costly. However, this would allow all options to be considered if the need arose in the future.

- (x) That when 12 months data is available after any changes to RHWS have been implemented, a report be presented to the Environment and Climate Change Overview and Scrutiny Committee on known impacts, effects on visitor numbers and tonnage deposited and overall customer satisfaction.**

The Panel notes that the Environment and Climate Change Overview and Scrutiny Committee will be consulted as part of any proposals ultimately put

forward by the Cabinet regarding the future of the RHWS. It therefore feels that this Committee will be best placed to consider the full impact of those changes (in particular any closures) on residents and challenge how any issues are being addressed and mitigated. The Panel feels that a report once 12 months data is available after implementation would be appropriate.

- (xi) That the use of Leicestershire RHWS by residents living out of County be reconsidered if, in the future, neighbouring authorities introduce new restrictions on Leicestershire residents using their sites.**

The Panel is conscious that changes made by neighbouring authorities could inevitably affect Leicestershire residents and the demand to use Leicestershire waste sites and therefore suggest that this be an area kept under review.

- (xii) That if any sites are closed communications be circulated to local residents to warn of the risk of rogue waste collectors to avoid fly tipping.**

Communications to residents will be important to both explain the changes proposed but also the unintended potential consequences if residents use unlicensed waste collectors to dispose of their waste. The Panel is keen for the Council to do what it can to ensure residents are informed of the risks and suggest that Leicestershire Matters be used to bring such messages to their attention.

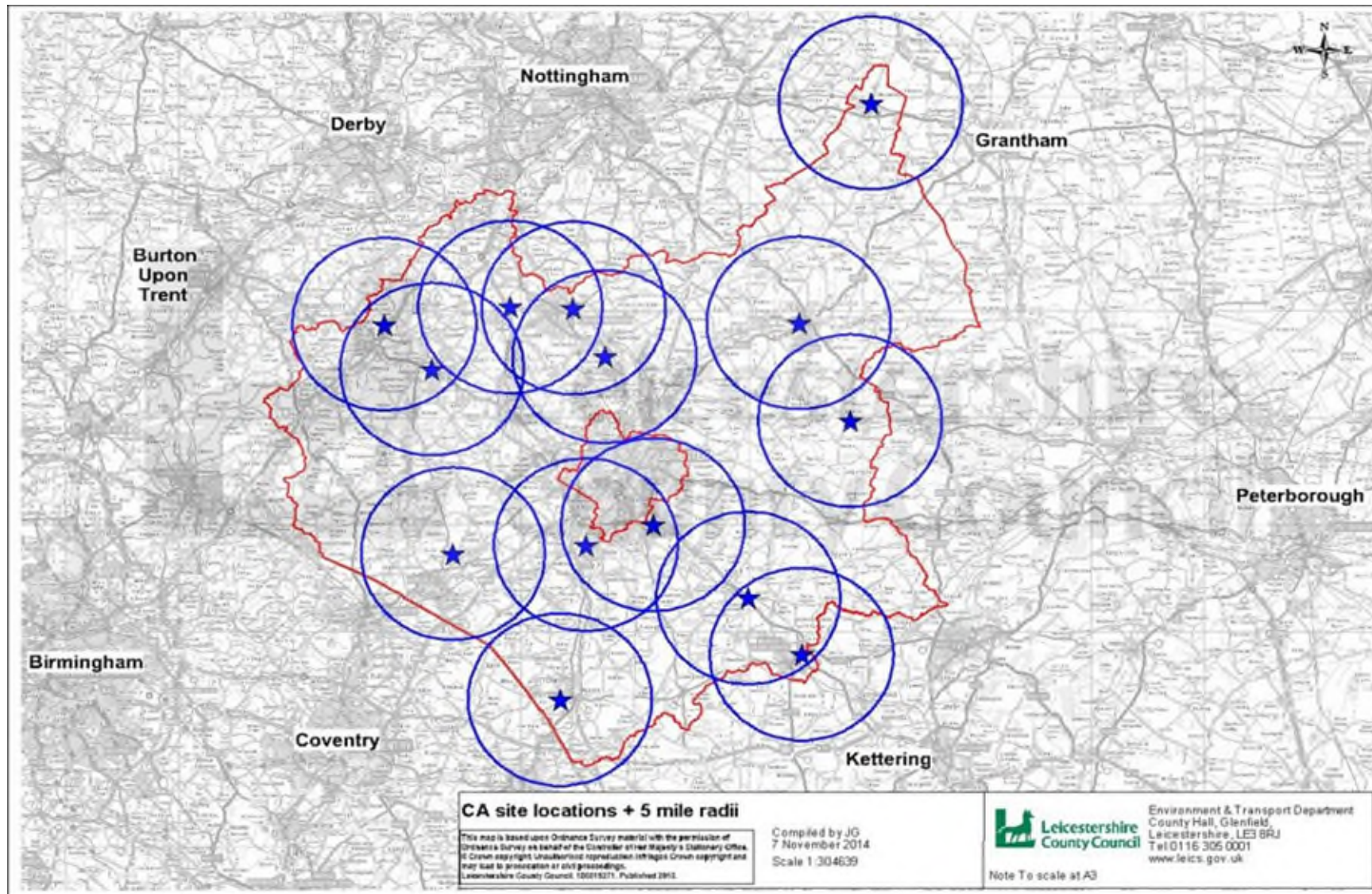
List of Appendices

- Appendix A - Neighbouring Authorities
- Appendix B - Current level of service with 5 mile radii
- Appendix C - Current level of service with 7 mile radii
- Appendix D - Nine sites with 5 mile radii
- Appendix E - Nine sites with 7 mile radii
- Appendix F - RHWS Catchment Area (2017)

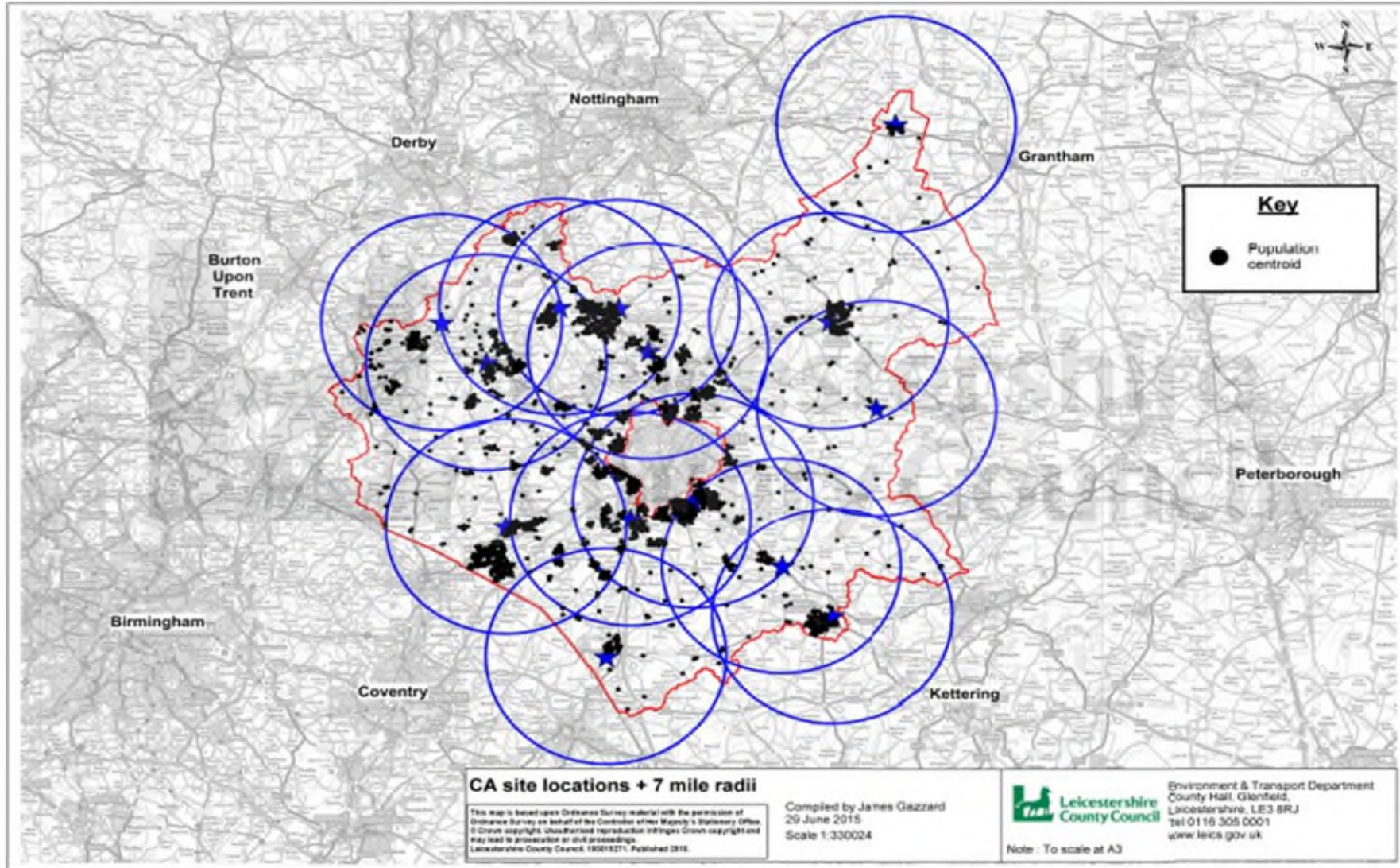
Appendix A - Neighbouring Authorities

Authority (County Authorities)	LAs geographical area (Km ²)	Number of HWRCs	Number of Households 2022/23	All Household waste recycling rate 2021/22	All Household waste (tonnes) 2021/22	All Household waste per household (kg)
Leicestershire County Council	2,156	14	310,300	43.4%	310,600	1013.6
Warwickshire County Council	1,975	9	268,900	47.9%	261,996	988.4
Staffordshire County Council	2,713	14	393,600	44.7%	419,154	1076.1
Nottinghamshire County Council *	2,085	12	376,330	42.0%	393,292	1052.7
Derbyshire County Council	2,547	9	373,490	47.3%	386,967	1047.2
Lincolnshire County Council	6,959	11	355,410	39.9%	346,514	984.0
Former Northamptonshire County Council	2,364	10	335,710	46.6%	348,665	1050.2

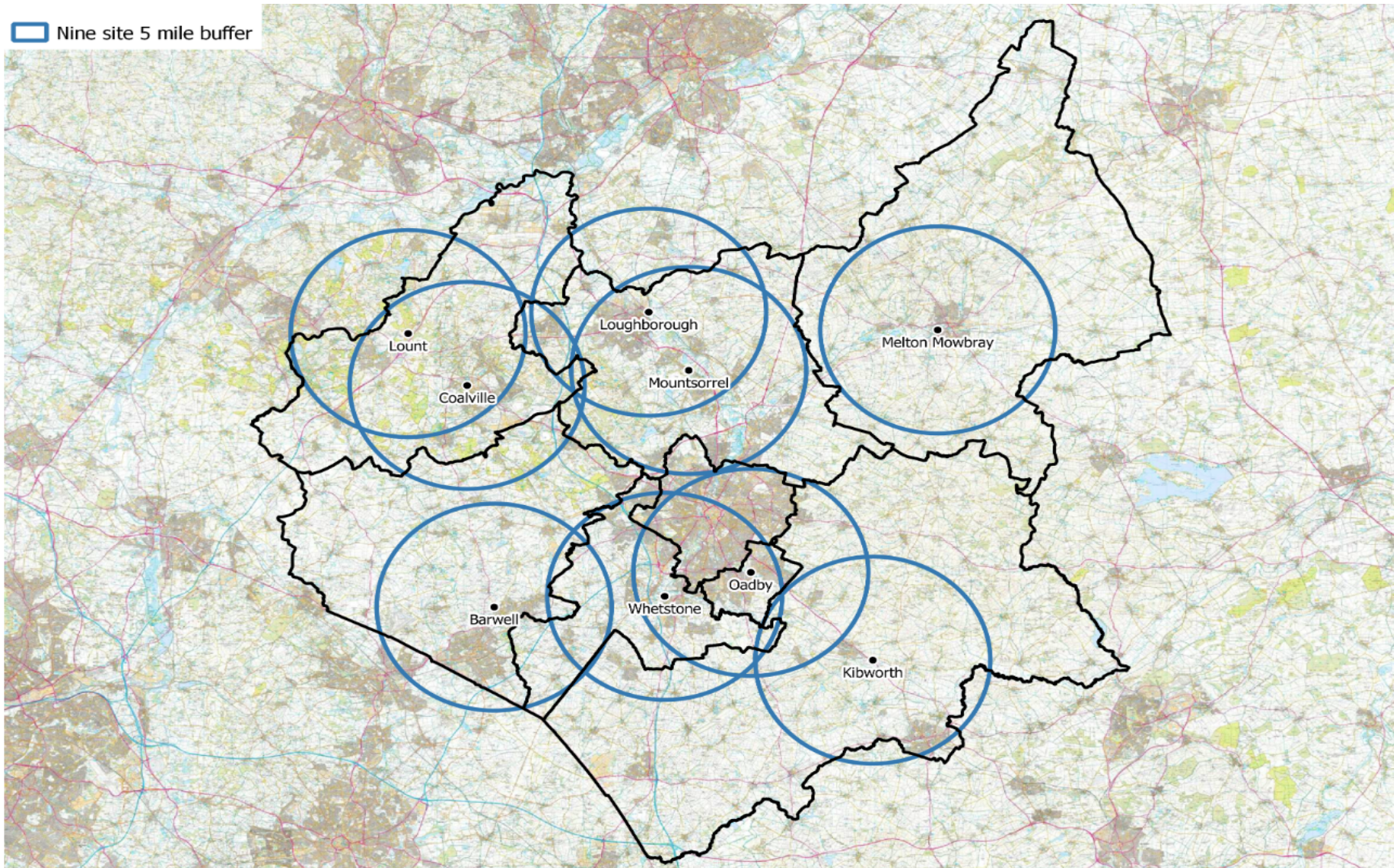
Appendix B - Current level of service with 5 mile radii



Appendix C - Current level of service with 7 mile radii



Appendix D - Nine sites with 5 mile radii



Appendix E – Nine sites with 7 mile radii



Appendix F – RHWS Catchment Area (2017)

Table 7: Tabulated catchment area results by District and RHWS

DISTRICT	Barwell		Bottesford		Coalville		Kibworth		Loughborough		Lount		Lutterworth		Market Harborough		Melton		Mountsorrel		Oadby		Shepshed		Somerby		Whetstone		Total		
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	
Charnwood					3	1%	1	0%	210	83%	2	1%					10	3%	271	91%	2	1%	231	75%	7	3%	2	1%	739	20%	
Melton			203	70%					2	1%					1	0%	295	81%	1	0%					141	66%			643	18%	
Harborough	1	0%	1	0%	2	1%	122	58%	1	0%			301	80%	150	71%					15	6%	1	0%	23	11%	4	2%	621	17%	
North West Leicestershire					195	79%			6	2%	182	75%			1	0%			3	1%			45	15%			1	0%	433	12%	
Hinckley and Bosworth	152	73%			28	11%	1	0%	1	0%	4	2%	3	1%					5	2%	1	0%	2	1%			23	11%	220	6%	
Oadby and Wigston							12	6%	1	0%					1	0%					182	78%					7	3%	203	6%	
Blaby	7	3%			1	0%	6	3%			2	1%	4	1%	2	1%			2	1%	3	1%					109	50%	136	4%	
Rushcliffe			25	9%					19	7%							1	0%	1	0%			17	6%					63	2%	
Leicester							1	0%			2	1%	2	1%			11	3%	6	2%	16	7%	1	0%	7	3%	12	6%	58	2%	
South Derbyshire					2	1%					22	9%																	24	1%	
South Kesteven			21	7%													1	0%											22	1%	
Kettering														18	9%														18	0%	
Rutland																				1	0%			14	7%					15	0%
Daventry					1	0%							1	0%	8	4%														10	0%
Rugby	2	1%											6	2%																8	0%
Corby															3	1%														3	0%
Derby								1	0%	2	1%																			3	0%
Lichfield										2	1%																			2	0%
Nottingham			2	1%																										2	0%
Erewash										1	0%																			1	0%
Gedling			1	0%																										1	0%
Milton Keynes																						1	0%							1	0%
Newark and Sherwood			1	0%																										1	0%
North Warwickshire	1	0%																												1	0%
Nuneaton and Bedworth	1	0%																												1	0%
Refused/incorrect	43	21%	36	12%	16	6%	67	32%	13	5%	23	10%	59	16%	26	12%	45	12%	8	3%	14	6%	9	3%	23	11%	59	27%	441	12%	
Total	207	100%	290	100%	248	100%	210	100%	254	100%	242	100%	376	100%	210	100%	363	100%	297	100%	234	100%	307	100%	215	100%	217	100%	3670	100%	

Districts which form Leicestershire County Council