



A Guide to Hampshire County Council's consultation on proposals for changes to the Household Waste Recycling Service



Household waste fly-tipping in Ashton Lane, Bishop's Waltham,
part of the South Downs National Park
9th May 2016

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Prepared by the Bishop's Waltham Society, May 2016



Do you use the Bishop's Waltham Household Waste & Recycling Centre (HWRC), and would you be sorry to see it closed? Hampshire County Council (HCC) has to make substantial annual savings (£1.55m) in the running of the 24 HWRCs across Hampshire, and is carrying out a public consultation to test reaction to various options, including the possible closure of some centres. The consultation document can be accessed at: www.hants.gov.uk/hwrc2016

For a number of reasons (specifically, the criteria being suggested by HCC) the Bishop's Waltham site in Claylands is looking very vulnerable to closure. We therefore urge everyone who values having a 'local tip' to respond to the consultation, **which closes at midday on Wednesday 25th May**. The HCC survey can be completed online at <https://www.snapsurveys.com/wh/s.asp?k=145769850180>

However the consultation document is 21 pages long and takes time to read and absorb, and the questionnaire (even though it only has 10 questions covering the three alternative HCC proposals) can feel puzzling.

The Bishop's Waltham Society does not believe its role is to tell people how to answer a public consultation. But we do believe it is appropriate and valuable to provide a quick guide and to highlight the significance of certain questions ( = our comments).


The Consultation

A prime consideration is that HCC have a duty under the Environmental Protection Act 1990 to arrange "for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited". The duty states that each waste disposal site should be:

- within the area of the Authority and reasonably accessible to residents in its area;
- open and available to residents to bring waste for disposal at reasonable times, including at least a period of time on a Saturday; and
- available free of charge to persons resident in the area to bring waste for disposal.

However, and importantly, HCC's consultation document goes on to say that "within this legal duty there is no set requirement for the number of HWRCs that local authorities should provide; a local authority may even [our emphases]decide that provision of **just one site is sufficient**. There is also no guidance for how much of the week sites should remain open, except for a period of time on a Saturday.

Hampshire County Council currently provides more HWRC sites than other, similar local authorities. HWRC sites are also currently open for more hours, and/or for more days of the week compared with some other networks operated by other local authorities."

 **This appears to be fair warning that site closures face no legal or regulatory obstacles.**


The proposals

HCC want reactions to three different proposals, each of which is designed to save money:

1. Reduce the opening hours of all 24 HWRC sites
2. Partially close one or more sites
3. Fully close one or more sites

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 The Bishop's Waltham site would only survive, in much the same form as it today, if proposal 1 is chosen. Under proposal 2 its opening period would be heavily curtailed (for instance only open 3 days a week or for 6 months of the year). Under proposal 3, (full closure of some sites) Bishop's Waltham's site is highly vulnerable (see below). **Please note only in one question (question 7) are you given the chance to choose between these proposals!**

The consultation questions

The questions asked under each proposal are different in both number and form. Bear in mind that the savings being sought are £1.55 million.

Proposal 1: to reduce opening hours

Question 1 - preference choice (reducing opening hours)

Approximate annual saving for the 3 options

1. Reduce opening hours at all sites by one hour per day, throughout the year: saving £400,000
2. Reduce opening hours by closing all sites on one day of the week: saving £450,000
3. Reduce opening hours by closing all sites on two days of the week, but introduce extended opening hours on one other day of the week: saving £800,000


Question 2 - preference choice (based on three options for different changes to opening times) - this is a matter of personal preference and no costings are provided.

Proposal 2: to partially close one or more sites

Question 3 - preference choice (partially closing smaller sites - for an annual period or on certain days of the week)

Approximate annual saving for the 2 options

1. Close up to 10 smaller sites during winter (1 October - 31 March): saving £500,000
2. Having up to 10 smaller and less busy HWRC sites only opening on Saturday, Sunday and Monday: saving £650,000


 Since the Bishop's Waltham site is among the 10 smaller sites, **your choice here is potentially very important**. The first option - complete non-availability of the site for six months of the year - sounds like a compromise that would please nobody. Think autumn leaves, Christmas packaging, New Year's Eve bottles and Spring cleaning! The second option has restricted access but provides year-round availability and greater savings.

Proposal 3: to fully close one or more sites

Question 4 - ranking choice (ranking the various criteria being used by HCC for closing sites)

You are asked to rank these four criteria according to the order in which HCC should use them in their choice of which sites to close:

- Site usage (tonnes of waste received)
- The proportion of the site's waste which is recycled
- Geographical location and distance from other sites
- Site operating costs

 This is the 'Catch 22' question! Whichever choice you make here is likely to work against the Bishop's Waltham site. The consultation document (page 9) shows how the 24 different HWRC's perform against a chosen set of criteria. Here are the seven that apparently have the worst operating costs (NB these costs are not disclosed but are simply identified symbolically by HCC as '£££').

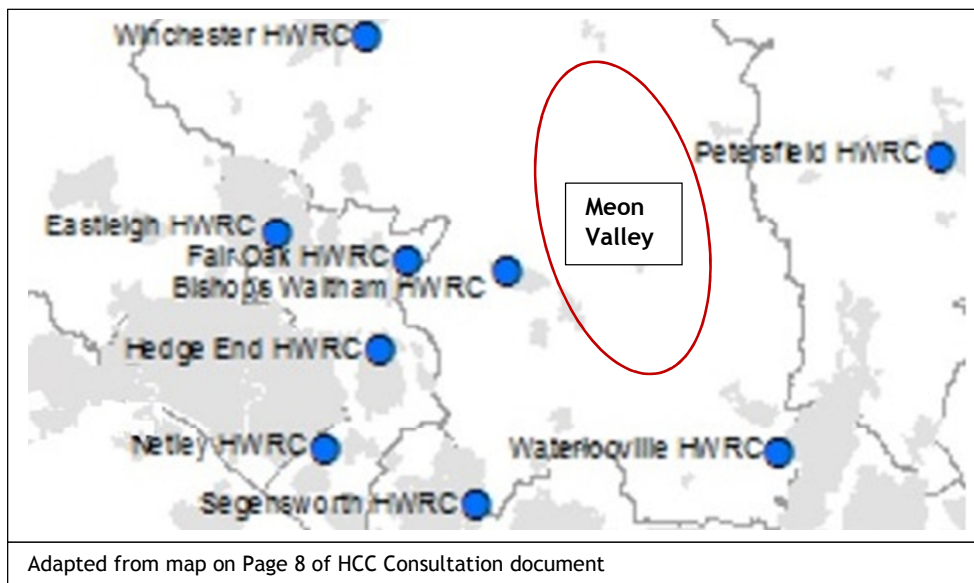
Comparison between 7 sites judged to have high (£££) operating costs					
Site	Modern/old	Size (acres)	Tonnes waste received*	% recycled*	Distance to alternative site
Aldershot	Old	0.5	5,943	76%	5.1
Alresford	Old	0.17	2,082	60%	7.7
Bishops Waltham	Old	0.55	4,030	79%	3.6
Casbrook (Romsey)	Old	0.35	5,437	92%	8.6
Fair Oak	Old	1.04	4,734	88%	3.3
Hartley Witney	Old	0.27	5,745	80%	8.3
Hayling Island	Old	0.15	3,231	81%	6.9

Extracted from table on page 9 of HCC Consultation document *2014/15 data

Against HCC’s four criteria, Bishop’s Waltham performs as follows:

- Site usage (tonnes of waste received) 3rd from bottom
- Proportion of the site’s waste that is recycled 3rd from bottom
- Geographic location and distance from other sites 2nd shortest distance
- Site operating costs in worst 7 (position unknown)

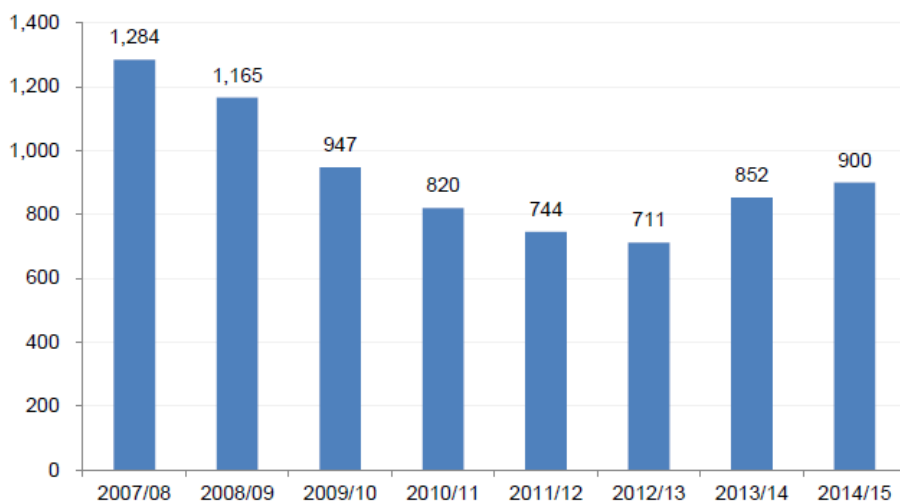
BWS We have no advice to offer here and you may choose to show ‘no preference’ to all (or to leave the question unanswered, though there is a concern this may invalidate your response!). **But we do believe the third criteria ‘Geographic location and distance from other sites’ conflates two separate issues.** The fact that the Fair Oak site is just 3.6 miles from Bishop’s Waltham is completely separate from the location issue. The map of HWRCs in the consultation document shows the location of the nearest sites to Bishop’s Waltham:



Whilst this illustrates the proximity of Fair Oak and Bishop’s Waltham sites, it also shows the value of Bishop’s Waltham’s location in terms of the well populated area of the Meon Valley [our addition]. It is salutary to see that their current choices consist of Petersfield, Waterlooville, Bishops Waltham and Winchester! Bishop’s Waltham stands out as an important satellite site within this rural area.

Were Bishop’s Waltham centre to close at a time when car mileage and resultant pollution are targets for reduction, an addition of between 10-15 minutes and 6-7 miles to every household waste recycling trip from the Meon Valley is clearly a retrograde step.

Fly-tipping has been a long-running problem in both rural areas and urban outskirts with 48% of fly-tipping taking place on highways (road side) and a further 28% in footpaths, bridleways and back alleyways (DEFRA 20th October 2015). After a consistent decline in recent years, the amount of fly-tipping has started to increase again since 2013/14, see chart below:



Trends in number of fly-tipping incidents in England, 2007/08 to 2014/15 (thousands)
DEFRA 'Fly-tipping statistics for England, 2014/15'

This trend is concerning, and costly enough without the likely rise in such tipping if HWRC sites are closed. The countryside roads and lanes provide ideal spots for those who are prepared to dump household waste. The South Downs National Park will also be vulnerable (see cover).



Fly-tipping of household waste, like this (near Bishop's Waltham), is already a problem in rural areas

Another **particular concern** is that the removal of fly-tipping and litter from highways is the responsibility of the District Council. So Winchester City Council will incur greater costs if fly-tipping increases as a result of Hampshire's efforts to save costs! This is another reason to reject options that are likely to increase this problem, i.e. full closure or partial closure for 6 months.

Question 5 - opportunity to suggest additional criteria

BWS This question enables you to suggest 'other' criteria that HCC could use in its assessments. The most obvious is that 'geographic location' should be treated separately from 'site proximity'. Other rational suggestions will no doubt be welcome.


Question 6 - ranking choice (how many sites to close: 4, 8 or 12)

Approximate annual saving

Fully close up to four sites £440,000

Fully close up to eight sites £1,050,000

Fully close up to twelve sites £1,850,000

 Though not quite a Catch 22 question, this one does not allow you to say that you do not want any sites to close. It simply offers the choice of four, eight or twelve sites (that is half the sites in Hampshire) to be fully closed down. In this circumstance, the majority of people are likely to choose the smallest number (four). This is likely to mean that most people will (consciously or not) be voting for the closure of Bishop's Waltham centre, given its weak position in HCC's current criteria.

Should any of these options be chosen then car mileage, pollution and fly-tipping are likely to increase proportionally. You may choose to express 'no preference' again here or not answer this question (though there may be a risk of invalidating your response).


Question 7 - ranking choice (which of the three proposals is your preference)

Only here are the three options offered for the first time, for you to choose. The options are:

Proposal 1: to reduce opening hours

Proposal 2: to partially close one or more HWRC sites


Proposal 3: to fully close one or more HWRC sites

 We would argue strongly that Proposal 1 is the best choice and that Proposal 2 is second best because Proposal 3 is likely to be the worst choice from Bishop's Waltham's point of view.

Question 8 - option to comment or make alternative suggestions


This question provides the opportunity to suggest 'other' solutions that HCC should consider. Again, alternative rational suggestions will no doubt be welcome.

Question 9 - option to say if there are any impacts on equality considerations that should be taken into account

 This is a regulatory question because it asks: "Are there any positive or negative impacts relating to equalities that you believe that the County Council should take into account in the decision making process?"

This relates to HCC's duty to take into account the impact of their decisions on people with protected characteristics under the Equality Act 2010 (age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy, maternity, race, religion or belief, and sexual orientation). The only options available are to answer 'yes' or 'no'. We leave the choice to you. If you answer 'Yes' you are asked for further information.

Final question: This unnumbered question relates to willingness to pay a small charge (currently forbidden by Government legislation).

 We have no advice to offer here. But the answer can have no effect on this round of cost-savings because Government legislation would need to be changed first.

We hope that this guide helps you. If it does, please forward, by email, to others... Thank you!

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