

<b>SUBJECT:</b>	<b>FUTURE PROVISION OF HOUSEHOLD WASTE RECYCLING CENTRES (HWRC) INCLUDING THE CLOSURE OF USK</b>
<b>MEETING:</b>	<b>CABINET</b>
<b>DATE:</b>	<b>7<sup>th</sup> OCTOBER 2020</b>
<b>DIVISION/WARDS AFFECTED:</b>	<b>ALL</b>

## 1. PURPOSE:

- 1.1 This report sets out the measures that will be necessary to meet the future statutory recycling targets and deliver waste services efficiently and effectively moving forward. The revised service delivery changes for the Household Waste Recycling Centres (HWRCs) including the full closure of Usk HWRC. These changes are in light of increased budget challenges and the many positive behavioural changes by the public in managing waste during Covid 19.

## 2. RECOMMENDATIONS:

- 2.1 The recommendations to rationalise the service provision of household waste recycling centres are:
- A) Continuation of the booking system at all sites, initially implemented to ensure social distancing
  - B) Full Closure of Usk
  - C) Introduce revised opening hours of 08:00 to 16:00
  - D) Additional day closure at Five Lanes and Llanfoist
  - E) Commence procurement of the HWRC contract based on the revised service model above.

The Chair of Strong Communities Select Committee will provide feedback to Cabinet from the Special Meeting of 28<sup>th</sup> September 2020. Reports from that meeting can be viewed following the link

<https://democracy.monmouthshire.gov.uk/ieListDocuments.aspx?CId=139&MId=4614>

## 3. KEY ISSUES:

### Overview

- 3.1 Monmouthshire's recycling rate peaked in 2016 at 67% and there has been a slow but steady decline in annual performance since that point. The UK has seen a plateauing of recycling performance and many Councils have seen reductions in recycling tonnages. The all Wales household recycling rate decreased from 61% in 2017/18 to

60.7% in 2018/19 but there has been substantial investments and interventions across Wales and most local authorities are expected to meet the 2019/20 64% target. The 64% target is set until 2024/25 when the target becomes 70%.

- 3.2 Monmouthshire forecasted to miss the recycling targets in 2019/20. The potential fine for missing the target by each 1% is £88,000. As such, reports highlighting potential service changes including rationalisation of HWRC provision were taken through Strong Communities and Cabinet. The decision to close the Usk facility taken in December 2019 was placed in abeyance for 6 months to allow further consultation on the wider HWRC provision and additional compositional analysis of waste streams.
- 3.3 Monmouthshire achieved the recycling target for 2019/20. This turnaround was due to a strong campaign of recycling messages from December to March and the unforeseen closure of HWRCs due to Covid 19 on March 23<sup>rd</sup> 2020. The closures and sudden reductions in residual waste entering the HWRC's helped achieve these targets. It is difficult to predict performance in 2020/21 but the first quarter saw the highest recycling rate ever in MCC of 74% with record numbers of residents using kerbside recycling collections and with HWRCs closed.
- 3.4 Almost 50% of all domestic waste and recycling produced in Monmouthshire in 2018/19 arrived at the HWRCs as single car/van journeys. This is despite Monmouthshire having full kerbside recycling systems for domestic waste streams and a bulky waste collection service operated by Homemakers. The average site throughput across Wales is closer to 30% of domestic waste and recycling.
- 3.5 Fines for failing to meet the recycling targets remain a concern. The implementation of measures already agreed along with the proposals within this report, will be key to ensuring MCC continue to meet and exceed the recycling targets. These targets are aligned to the Council's Climate Change Emergency and Circular Economy policy commitments. Increasing use of kerbside collections and reducing single car/van journeys to HWRC sites will reduce the carbon footprint of individual waste miles.
- 3.6 Monmouthshire tries to ensure that the focus on waste management is reducing waste production wherever possible. Promotions and campaigns to reduce food waste, single use plastics, and using returnable milk bottles impact negatively on recycling tonnages but remain the right thing to do for the waste hierarchy and the environment.
- 3.7 After waste reduction, kerbside collections of a wide range of materials is the most environmentally friendly way to manage household recycling and waste. Monmouthshire County Council provide collection services for the vast majority of household recycling and waste streams. Our partners Homemakers deliver a comprehensive bulky waste collections service for items that can't be placed in the recycling and waste collection service.
- 3.8 There is a statutory duty under Environmental Protection Act 1990 to provide one Civic Amenity site (more commonly known now as Household Waste Recycling Centres) within a County Council to dispose of bulky items. The site must be open on at least one day of the weekend unless this period is over Christmas. These sites were

originally set up to dispose of waste not collected at the kerbside. They became known dumps, tips and skips, seen as somewhere to deposit all types of additional rubbish, house clearances, DIY, business waste etc although this was not the original purpose.

- 3.9 Public awareness of climate change and the rise in waste specific TV shows like Money for Nothing impact positively on the public psyche. Covid 19 has dramatically changed public behaviour in relation to waste and the wider environment. We should actively promote and maintain these positive behaviours that support action for climate change emergency. People are slowly moving away from the thought that HWRCs are tips and dumps and more towards re-use and recycling facilities.
- 3.10 There are many who believe visiting the sites several times per week to dispose of black bag and residual waste and not using kerbside recycling options is still acceptable. Ease of access, unchallenged use of the residual waste skip, disposal of black bags full of mixed waste undermines the efforts of the vast majority who try to recycle everything they can at the kerbside each week. Future provision needs to offer a wider variety of recycling and reuse options on a smaller number of sites. The majority of recyclable materials have an associated treatment cost.
- 3.11 Over the last five years many local authorities have rationalised service provision and focussed investment in fewer, better quality and higher performing sites. Like Monmouthshire, most have implemented day closures and many more have reduced/seasonal hours.
- 3.12 Many sites across Wales and the UK are reporting +80% recycling rates compared to Monmouthshire's combined recycling rate of 58% across the four sites as shown in Table 1 below.

**Table 1**

	<b>Five Lanes</b>	<b>Llanfoist</b>	<b>Troy</b>	<b>Usk</b>	<b>Total</b>
<b>Residual</b>	3021.89	4288.50	1268.28	680.06	9258.73
<b>Recycle</b>	4622.08	6013.91	1519.99	625.85	12781.83
	<b>7643.97</b>	<b>10302.41</b>	<b>2788.27</b>	<b>1305.91</b>	<b>22040.56</b>
<b>Recycling %</b>	<b>60.47%</b>	<b>58.37%</b>	<b>54.51%</b>	<b>47.92%</b>	<b>57.99%</b>

- 3.13 The recycling rates at the sites are the lowest in Wales and this reduces the positive recycling percentages achieved by the high number of residents who recycle at the kerbside. This is not only due to the high volumes of waste that enter the sites but a lack of capacity at the smallest sites in Usk and Mitchel Troy to include additional recycling options.
- 3.14 Vehicle restrictions including van and trailer permits introduced in 2016 saw a reduction of waste from traders using the sites to dispose of commercial waste. An outright ban of commercial type vehicles deemed impractical in a rural county resulted in a permitting system for those vehicles. The system worked well but the introduction of single use permits for one off visits increased tonnages.

3.15 Resident permits were issued in June 2019 to every household. This was in response to increasingly high volumes of cross border waste entering the sites following neighbouring authority restrictions on their sites. This has been very successful and overall waste tonnages reduced by over 3000 tonnes in 2019 compared to 2018. The 3000 tonne reduction in waste entering the sites also contained a high percentage of recycling, negatively impacting recycling rates. It was clear that residents from neighbouring authorities brought more recycling than waste to the sites.

3.16 Chart 1 shows compositional analysis of residual waste going into Llanfoist, Five Lanes and Mitchel Troy. It shows how much material could have been recycled at the kerbside. Almost 20% of residual waste entering the sites was food waste (also known as putrescibles). In comparison, Table 2 shows that 38% of black bag waste contents at the Usk site was food waste.

Chart 1 – Compositional analysis of black bags at Llanfoist, Five Lanes and Mitchell Troy

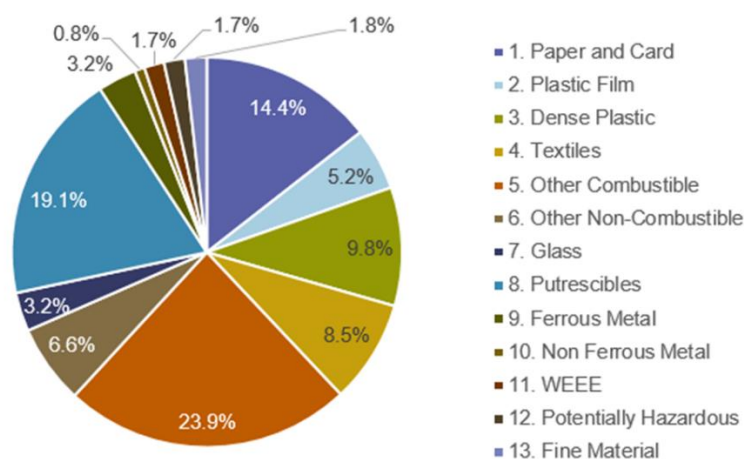
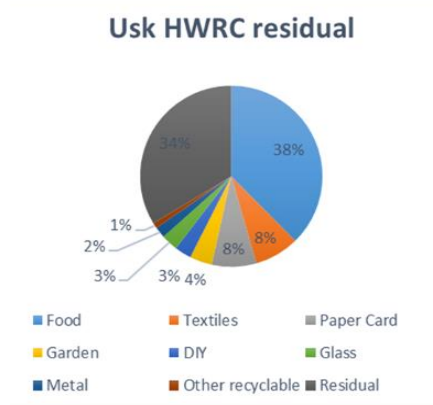


Table 2 –Compositional analysis of black bags in Usk HWRC 2019

Food	38%
Textiles	8%
Paper/card	8%
Garden	4%
DIY	3%
Glass	3%
Metal	2%
Other recyclable	1%
Residual	34%



3.17 Making waste disposal an easy option does not achieve high recycling rates. A move to monthly waste collections in other parts of Wales saw substantial rises in the use of kerbside recycling, particularly food waste. Many residents in Monmouthshire used the HWRCS rather than participating in kerbside recycling or adhering to the two

black bag limit. Easy access to a site drives poor recycling behaviour in the same way as weekly refuse collections did many years ago in Wales.

- 3.18 Recycled waste at the Usk site reduced again in 2019 to 45% and is the lowest performing site in Wales. The data gathered during Covid19 confirms that greater participation in kerbside collections and reduced access to HWRCs increase recycling rates.

**Key Issues: HWRCs usage through a Covid 19 lens**

- 3.19 The Covid pandemic has shown what is achievable in recycling terms. A recycling rate of 70%+ was achieved when waste was only collected at the kerbside. The efforts of the residents that support all the recycling schemes at the kerbside are undermined by a minority that use the HWRCs for disposal of black bag waste with high quantity of material that could have been recycled at the kerbside. The recycling rate achieved at the HWRCs also increased with the smaller sites remaining closed and the booking system introduced.
- 3.20 Claims that closures of sites would massively increase flytipping and leave town centres full of rubbish have not materialised. All sites closed from March 23<sup>rd</sup> to May 26<sup>th</sup>, only the two larger sites in Llanfoist and Five Lanes initially reopened. Our towns have remained green, attractive and well maintained. There is little correlation between access to HWRCs and fly-tipping and authorities that have closed sites do not report increased fly-tipping as a result.

**Reported flytipping:**

Flytipping Comparison		
	2019/20	2020/21
April	113	119
May	115	116
June	73	107
July	132	129
August	54	68

There was an increase in fly-tipping of 52 incidences (10%) over the first five months of lockdown and the increases were predominantly in Abergavenny and along the border.

There has been a reduction in fly-tipping in Monmouth during 2020 compared to 2019 and Usk remained at similar levels.

**Booking system, revised opening hours and additional day closures**

- 3.21 Since reopening there has also been a massive reduction in number of visitors to the sites compared to 2019 as evidenced by the booking system data. This positive behaviour change has increased recycling at the kerbside and the numbers of residents now using the full range of kerbside services.
- 3.22 Table 3 below shows visitors during June 2019, Usk was not included on the count but tonnage data would suggest that 170 - 200 cars per day use the facility when compared to the larger sites and material composition.

Table 3

<b>Mitchel troy</b>	Total number of entrants in June:					7184		
Average	Tuesday	Wednesday	Friday	Saturday	Sunday			
8am - 9am	30	16	24	24	25		Average per day	342.0952
9am - 10am	26	25	37	49	37			
10am - 11am	30	33	42	38	45			
11am - 12pm	42	30	35	49	52			
12pm - 1pm	30	35	34	49	37			
1pm - 2pm	24	25	20	41	50			
2pm - 3pm	30	36	35	37	43			
3pm - 4pm	32	30	28	41	42			
4pm - 5pm	21	24	18	36	27			
5pm - 6pm	14	20	19	23	18			
Average Total:	277	274	292	387	375			
<b>Five Lanes</b>	Total entrants in June:					9736		
Average	Monday	Tuesday	Wednesday	Friday	Saturday	Sunday		
8am - 9am	20	17	20	22	38	34		389.4533
9am - 10am	38	27	33	43	43	39		
10am - 11am	41	39	42	50	42	56		
11am - 12pm	39	40	37	36	44	61		
12pm - 1pm	27	36	30	33	45	60		
1pm - 2pm	41	29	39	50	48	49		
2pm - 3pm	46	42	38	53	47	47		
3pm - 4pm	35	30	32	45	42	49		
4pm - 5pm	33	33	28	40	41	38		
5pm - 6pm	21	20	18	25	19	17		
Average Total:	339	311	314	397	407	451		
<b>Llanfoist</b>	Total entrants in June:					16598		
Average	Monday	Tuesday	Thursday	Friday	Saturday	Sunday		
8am - 9am	28	31	76	50	49	35		663.92
9am - 10am	42	53	98	70	63	63		
10am - 11am	40	65	97	81	76	108		
11am - 12pm	41	50	102	81	82	125		
12pm - 1pm	28	57	85	72	81	131		
1pm - 2pm	41	42	85	69	72	116		
2pm - 3pm	37	42	83	69	71	91		
3pm - 4pm	33	43	75	56	59	81		
4pm - 5pm	27	32	59	60	64	58		
5pm - 6pm	21	22	37	29	36	30		
Average Total:	338	436	796	636	654	839		

Tables 4 a, b, c, d show numbers of visitors during the last two months and where those visitors came from.

Table 4a

Visits to Llanfoist July – September 2020. The original capacity for 420 vehicles reduced to allow vans and trailers and currently there is capacity for 360+ vehicles per day.

02/07/2020	19	16/07/2020	327	30/07/2020	307	13/08/2020	289	27/08/2020	296
03/07/2020	145	17/07/2020	316	31/07/2020	301	14/08/2020	310	28/08/2020	302
04/07/2020	179	18/07/2020	303	01/08/2020	110	15/08/2020	253	29/08/2020	250
05/07/2020	170	19/07/2020	222	02/08/2020	127	16/08/2020	176	30/08/2020	238
06/07/2020	163	20/07/2020	253	03/08/2020	201	17/08/2020	216	31/08/2020	210
07/07/2020	226	21/07/2020	270	04/08/2020	164	18/08/2020	130	01/09/2020	201
08/07/2020	0	22/07/2020	0	05/08/2020	0	19/08/2020	0	02/09/2020	0
09/07/2020	294	23/07/2020	315	06/08/2020	296	20/08/2020	294	03/09/2020	265
10/07/2020	288	24/07/2020	311	07/08/2020	303	21/08/2020	259		
11/07/2020	241	25/07/2020	298	08/08/2020	249	22/08/2020	203		
12/07/2020	230	26/07/2020	243	09/08/2020	211	23/08/2020	197		
13/07/2020	233	27/07/2020	238	10/08/2020	241	24/08/2020	243		
14/07/2020	262	28/07/2020	251	11/08/2020	170	25/08/2020	172		
15/07/2020	0	29/07/2020	0	12/08/2020	0	26/08/2020	0		

Table 4b  
Heat map showing visits

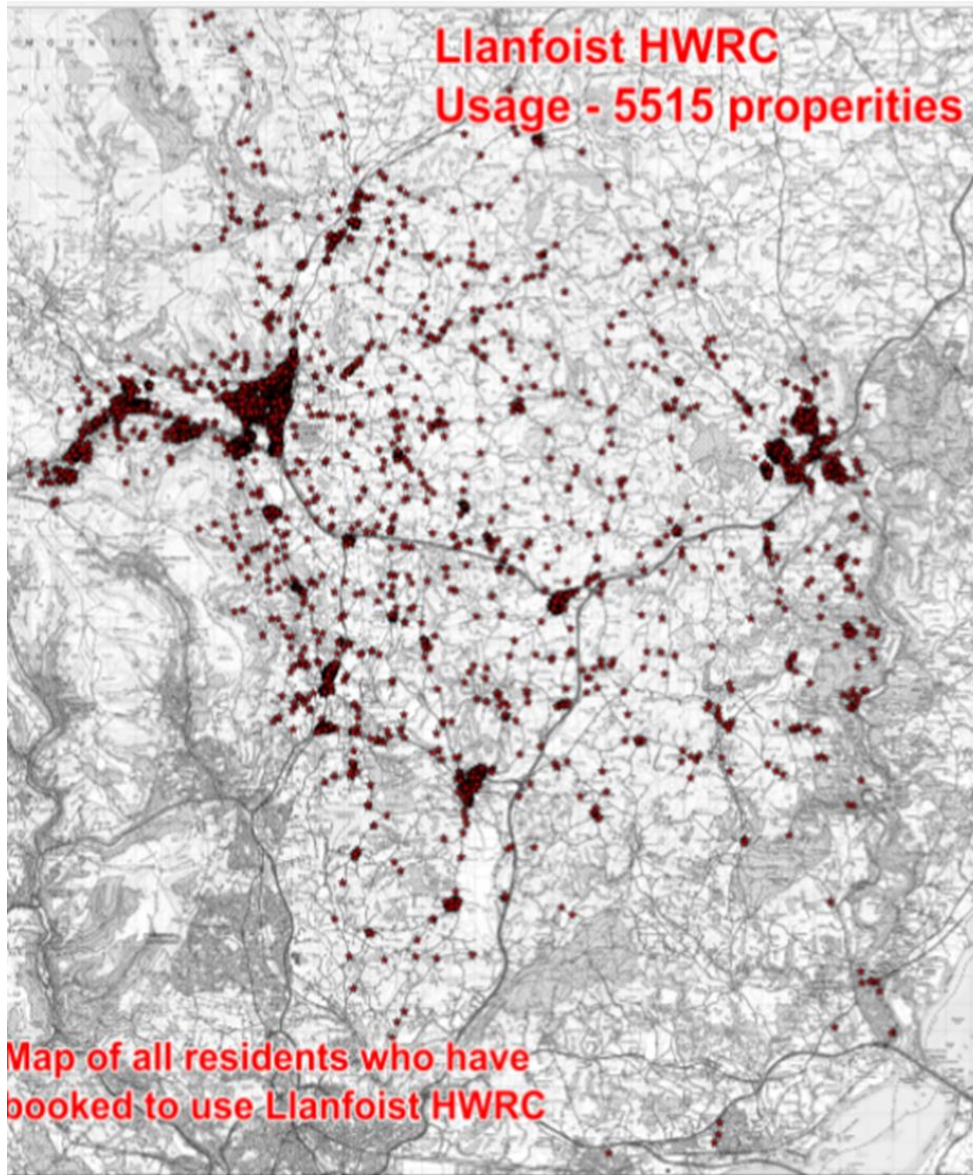
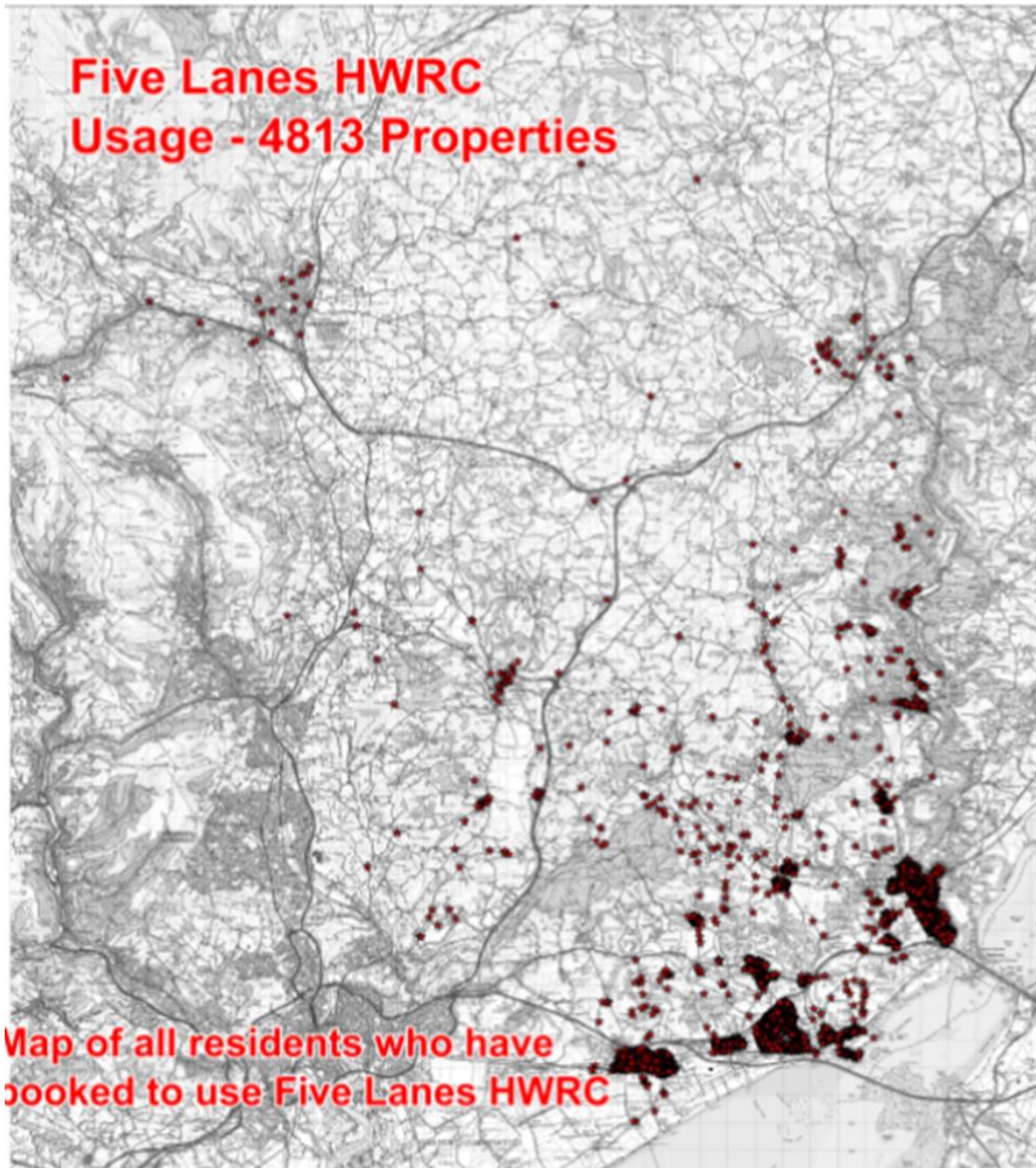


Table 4c  
Five Lanes visits, capacity for 360 visits

03/07/2020	123	17/07/2020	319	31/07/2020	263	14/08/2020	284	28/08/2020	284
04/07/2020	109	18/07/2020	213	01/08/2020	106	15/08/2020	169	29/08/2020	218
05/07/2020	136	19/07/2020	172	02/08/2020	89	16/08/2020	129	30/08/2020	125
06/07/2020	137	20/07/2020	167	03/08/2020	148	17/08/2020	151	31/08/2020	133
07/07/2020	128	21/07/2020	197	04/08/2020	117	18/08/2020	121	01/09/2020	115
08/07/2020	186	22/07/2020	219	05/08/2020	139	19/08/2020	96	02/09/2020	137
09/07/2020	0	23/07/2020	0	06/08/2020	0	20/08/2020	0	03/09/2020	0
10/07/2020	250	24/07/2020	302	07/08/2020	273	21/08/2020	253		
11/07/2020	181	25/07/2020	217	08/08/2020	195	22/08/2020	137		
12/07/2020	191	26/07/2020	187	09/08/2020	155	23/08/2020	136		
13/07/2020	160	27/07/2020	174	10/08/2020	162	24/08/2020	175		
14/07/2020	219	28/07/2020	157	11/08/2020	122	25/08/2020	119		
15/07/2020	209	29/07/2020	184	12/08/2020	110	26/08/2020	103		
16/07/2020	0	30/07/2020	0	13/08/2020	0	27/08/2020	0		



Table 4d



- 3.23 Tables 3, 4a and 4c, show a stark difference in site usage as we come out of Covid restrictions. In 2019, the average daily visits were 1500 across the 4 sites, in 2020 this is reduced to 420 across the two sites open.
- 3.24 The heat maps 4b and 4c show that Llanfoist attracts more visits, particularly from Usk. This is despite Five Lanes being closer in mileage terms for many of those visits. Encouraging residents to use the full range of kerbside services will reduce unnecessary mileage and single journeys to sites.
- 3.25 Table 3 shows a reduction in usage between 4pm and 6pm, this is considerably more noticeable during the winter hours. The booking system allowed for a clean down of the site between 10am-11am, 1pm-2pm and 5pm and 6pm with no public access. We have not received any requests for visits between these times since the introduction of the booking system.

3.26 Tonnage and performance data in Table 5 shows what is achievable when the usage of the HWRCs was limited.

Table 5

	Tonnage Apr-July		Recycling rate Apr-July	
	2019	2020	2019	2020
Kerbside	8629	9678	67.5%	68.5%
HWRC	6772	2393	64%	74%

- Overall decrease in tonnage of approximately 3,400 tonnes (-22%)
- Increase in kerbside tonnage of approximately 1,000 tonnes (+12%)
- Decrease in HWRC tonnage of 4,400 tonnes (-65%)
- Figures indicate a slight increase in kerbside recycling rate
- Figures indicate a 10% improvement in HWRC recycling rate

3.27 Bookings peaked in week 2 with 80% of slots filled. This has decreased to 62% of capacity used on the two sites open in July and August. The reopening of Mitchel Troy will give a small increase in capacity resulting in 40% headroom. Table 6 shows the potential savings that could be achieved if the sites were opened to align with actual capacity usage’.

Table 6

Current Service provision in contract - 220 hours per week
Opening hours currently operated (inc Mitchel Troy) - 117 hours per week
Capacity currently utilised - 75 hours per week
Open 8am to 4pm - maintain 2 x 30 min breaks for cleaning/skips - capacity 117 hours
Open 8am to 4pm and close additional day Llanfoist and Five Lanes - capacity 103 hours
8am – 4pm estimated saving £140k pa
Close additional day Llanfoist and Five Lanes estimated saving £100k

3.28 Over 80% of the bookings were via the self-service portal and 20% of residents booking via the Contact Centre. Many of residents complimented staff on site despite some initial issues for some in using the booking system. The system is not as intuitive as we would want long term, developed very quickly to get the sites re-opened.

### HWRC provision survey

3.29 The Cabinet decision to close the Usk facility in 2019 was placed in abeyance to allow for a consultation on the provision of services and proposed changes. The consultation ran from March 10<sup>th</sup> to April 10<sup>th</sup> 2020. Promoted on social media, the press, on the sites themselves and through Usk Town Council. The full consultation results are included in Appendix 1A Cabinet Report – HWRC Provision October 2020

### **Rationalisation of HWRC provision and the closure of Usk**

- 3.30 Recycling performance on the Usk site has always been considerably lower than at MCC's other sites. Welsh Government recycling targets achieved through the efforts of the kerbside recyclers meant lower performance on the HWRCs was not an issue.
- 3.31 With much higher targets over the next 4 years there is a need to rationalise service provision and focus on increasing recycling at the kerbside. Closure of the poorest performing site in Wales at Usk is key to improving participation in kerbside recycling. The survey from March 2020 shows that of the respondents that visit the Usk site 71% do so on a weekly basis and 52% of the waste deposited is black bag residual.
- 3.32 The compositional analysis of black bag waste shows that over 60% of this should have been recycled at the kerbside. Respondents stated that over 60% of the waste they bring to sites could be collected at the kerbside.
- 3.33 The re-tendered contract will place a performance target of 75% on to the contractor. There are performance related deductions set out within the contract to ensure MCC does not fail future recycling targets. Contractors have raised concerns about targets given the low performance at Usk.
- 3.34 The Usk site does not meet current best practice guidelines due to the steps and gantries system. The gantries make the site unsuitable for disabled or infirm residents and poor lighting of the gantries leads to complaints and potential slips, trips and falls. (The difficulty in keeping the gantries clean along with site staff unable to support residents with material is the reason that Usk will remain closed during Covid 19).
- 3.35 Lighting and electrics on site need investment and power surges knocked out lighting in the Maryport street carpark several times in November 2019.
- 3.36 A near miss with a disabled resident and 44 tonne vehicle occurred when the vehicles used to drive out against the flow of traffic. A Viridor Health and Safety investigation at the time requested that this long-standing practice cease. There was a loss of 18 car park spaces to improve the access and egress for the large vehicles. Issues with traversing through a busy carpark with a 44 tonne vehicle remains a substantial risk. Removal of the site would enable an increase in car parking spaces that would be of significant benefit to traders and residents in the town as the car park is frequently full.
- 3.37 There have been several bumps in the car park with cars waiting for the site. A woman, thankfully not harmed seriously, hit by her husband's car on the exit to the site. Several claims for damage for slips, trips and falls on the site continue despite the improvements made.
- 3.38 The links between air pollution and respiratory diseases are understood. During peak summer season the site attracted between 170 and 200 additional vehicles through the car park and town each day. The introduction of the booking system (Usk site will

only accommodate a maximum of 10 cars per hour post-covid and social distancing) will substantially reduce this impact but any return to normal will again exacerbate these issues.

- 3.39 A review of service provision based on site use, tonnages and capacity to improve carried out by Eunomia in 2017 clearly identifies the need for further investments in Usk and Troy with particular concerns regarding drainage and Health and Safety at Usk. Even with investment in the drainage required to meet NRW standards, investment in gantries, surfacing and lighting improvements estimated at over £30,000 the site would still be too small to accommodate a wide range of skips and will remain the lowest performing recycling centre in Wales.
- 3.40 Officers negotiated a reduction of £40,000 based on the original report to close Usk as part of a budget saving proposal. Viridor agreed to honour this agreement in line with the 6 month abeyance due to Covid. If the Usk site is not officially closed and Viridor are unable to vacate the site MCC will not receive the £40,000 in year saving.

### **HWRC and Transfer Station Contract Management**

- 3.41 The existing contract for HWRC management has been operational since 1992 and is due to be retendered. The contract is partnership arrangement Monmouthshire County Council and Viridor and both parties recognise that the existing contract needs to be substantially changed to take account of recycling performance and budget constraints. Viridor have worked with the Council throughout this partnership and have been instrumental in increasing recycling on sites and reducing operational costs despite the original contract being based on landfill.
- 3.43 Cabinet agreed to retender the service in 2016 and soft market testing was carried out with a good level of market interest. It was clear from the market that clarity of service provision in the tender documentation was key to reducing risk pricing. The tendering process was due to commence in 2017 with conclusion in 2018. Changes to the service provision as a result of the Medium Term Financial Planning budget processes including day closures, rationalisation, household permits and profit sharing mechanisms meant the clarity required by contractors was not available. Ambiguity in tenders can lead to risk pricing, legal challenges or low numbers of tenders and therefore the procurement process has not commenced.
- 3.44 MCC negotiated with Viridor to reduce the management of sites fee by £40,000 with no indexation of contract for 20/21. This was on the understanding that the contract will be retendered during 2020 and the existing contract was extended until March 31<sup>st</sup> 2021. This is extended until September 2021 to allow service provision to be finalised. Abeyance of the decision on Usk and subsequent Covid 19 pressures have delayed progress. Viridor have agreed to support MCC until September 2021 to allow for the tender process to be completed but this is likely to incur additional costs.
- 3.45 Officers have reviewed the costs and identified options for insourcing. This would give the Council flexibility in service provision going forward but the recent crashes in the recycling market have identified the wider risks of predicting running costs against

income generation from recycling. Monmouthshire's total tonnages are very small and the buying and selling power of larger waste management companies offer far less risk in volatile markets.

- 3.46 Through Covid a clear picture of what can be achieved as emerged. With the worst performing site was closed and a booking system introduced recycling rates at HWRCs are at an all-time high. With the implementation of black bag sorting recycling rates on par with neighbouring authority's 80%+ are achievable. This will increase confidence of bidders and reduce the costs associated with risk pricing.

## **4.0 OPTIONS APPRAISAL**

- 4.1 Booking System
- 4.2 HWRC service provision
- 4.3 Opening hours
- 4.4 Additional day closures
- 4.5 HWRC Contract Management

### **4.1 Booking System**

#### **Option 1 : Do Nothing**

- Allow residents to visit the site without booking. This would not allow the controls necessary to manage the Covid 19 requirements.

#### **Option 2 : Continuation of booking system**

- The data supports the continuation of the booking system. We will work with the neighbouring authorities and Abavus to ensure the system is more intuitive and supports self-servicing at higher levels

### **4.2 Closure of Usk**

#### **Option 1: Do Nothing**

- Do nothing is rarely an option. Escalating costs, poor performance, budget constraints, procurement deadlines all necessitate change, coupled with Covid 19 the Do Nothing Scenario is unlikely to be an option for any service going forward.

#### **Option 2: Unmanaged (un-staffed) recycling facility or bring bank system on existing or other site.**

- Any permanent waste storage facility would need planning and permitting. While existing sites are usually accepted by neighbouring properties, new sites or changes to existing facilities are usually vehemently opposed. An unmanned facility would only be able to take waste materials that are collected at the kerbside.

- Bring banks were removed in Wales with the roll-out of kerbside collections, historically they attracted fly-tipping and trade abuse and in some areas they became a target for arsonists. Many were on large supermarket sites where there was a physical and CCTV presence that helped control abuse.
- Powys recently closed its unmanaged facilities and garden waste skips due to increased trade abuse and spiralling costs of contamination in skips. Sites accepting potentially hazardous materials tyres, asbestos, paint, waste electrical and electronic equipment (WEEE) etc must be managed and staffed.

### **Option 3: Managed (staffed) facility with “recycling only” “no black bags” on present site.**

In theory, this would seem an ideal solution to increase recycling. This would potentially work on a large site with a very wide range of recycling facilities but on a site limited by size and capacity the options for a variety of recycling materials are significantly limited.

- A recycling only facility was considered as an option for Usk but the relatively low tonnages through the site would not justify the costs of managing the facilities. The 625 tonne recycling throughput at Usk would equate to staff costs of £115 per tonne compared to £10 per tonne in Llanfoist.
- Any material brought to the site that could not be recycled in the very limited number of skips would be turned away. Residents turning up with carpet/underlay, hard plastics, plastic bags, mixed materials, upholstery, MDF, crisp packets, tetrapaks etc. in any quantity would be advised to visit one of the other sites. If the booking system is retained it would be unlikely that these sites would have been booked by the residents and residents would have to take the waste home again and rebook for another day. This would be a constant source of frustration for the residents.
- Overall residents ranked black bag disposal as the fourth most important issue and 25%+ of residents said they mainly dispose of black bags. It is unlikely that they would feel their expectations regarding, helpful staff, wide range of recycling facilities and proximity of the site was positively managed, if they were not allowed to bring any residual waste (including bulky items) to site.
- Over 60% of waste entering Usk could be collected at the kerbside. Over 60% of the black bag contents, being disposed at Usk, could easily be recycled at the kerbside.

### **Option 4: Consider other restrictions**

- Restricting the quantity of black bags allowed per visit was an approach taken by several Councils. Most had a maximum of 2-4 black bags per visit being the equivalent of a missed kerbside collection. Many residents state they use the sites on a daily/weekly basis and limits are unlikely to be effective. The issue

on Usk is not only black bags but any waste material that could be recycled on a larger facility.

- Restricting numbers of visits per year per household is equally difficult to enforce and make equitable and introduces the same issues of restricting vehicle sizes. Different size vehicles, vans/trailers, types of waste brought in etc. Restricting size of vehicle was partly introduced with restrictions on vans/trailers but there are many exemptions.
- Reduce skip size to include additional recycling capacity at Usk. Reducing the size of the skips would necessitate additional closures to remove the popular materials. It will be more expensive to make an increased number of collections of smaller skips and increase the carbon footprint of haulage.

#### **Option 5: Site managed and operated by Usk TC/ third party/ volunteers**

- Sites must be permitted to accept waste. Sites must be managed and operated by suitably qualified persons.
- The staffing costs on the site are relatively small compared to the cost of disposal of material throughput. The 1300 tonnes of material entering the site would cost approximately £120,000 to treat (recyclate value netted off).
- Several businesses have shown an interest in using the site and this could be investigated by Usk Town Council as a community led facility.

#### **Option 6: Insourcing to reduce costs**

- Insourcing the services has been fully investigated and remains an option dependant on the final tender costs received and the prevailing risks associated with volatility of recycling markets. The flexibility benefits in the Council managing the sites would be reduced if officers are able to negotiate favourable service and variation of provision terms with tenderers but this is not guaranteed.

### **4.3 Opening Hours**

#### **Option 1 : Do Nothing**

Maintain existing hours, this would be providing an over capacity of 40% based on current figures.

#### **Option 2 : Reduce hours**

The reduction in hours will provide savings as set out in report, it will maintain an headroom of 40% capacity with a reduction in site closures in the middle of the day to 2 x 30 min breaks for cleaning down site.

### **4.4 Additional day closures**

### **Option 1 : Do Nothing**

Maintain existing hours, this would be providing an over capacity of 40% based on current figures.

### **Option 2 : Reduce hours**

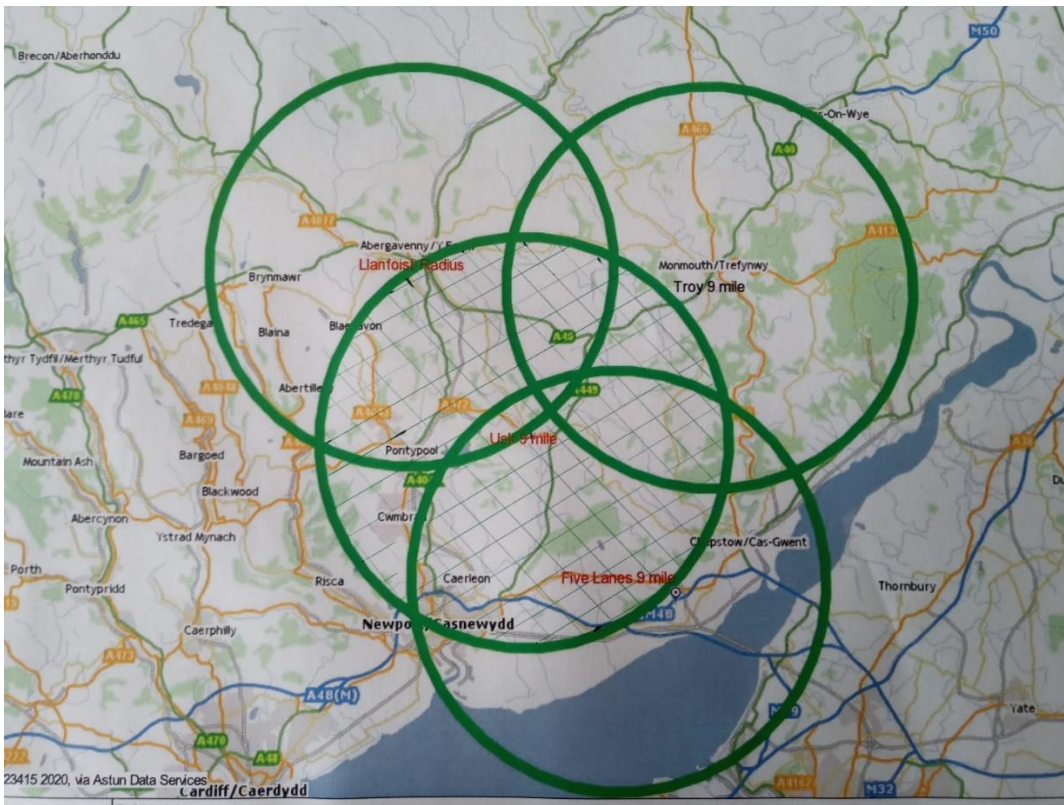
The additional day closures will provide savings as set out in report, it will maintain an headroom of 25% capacity. Greatest savings are achieved with weekend closures but costs are based on mid-week closure.

## **5.0 REPRESENTATIONS**

### **Usk Town Council.**

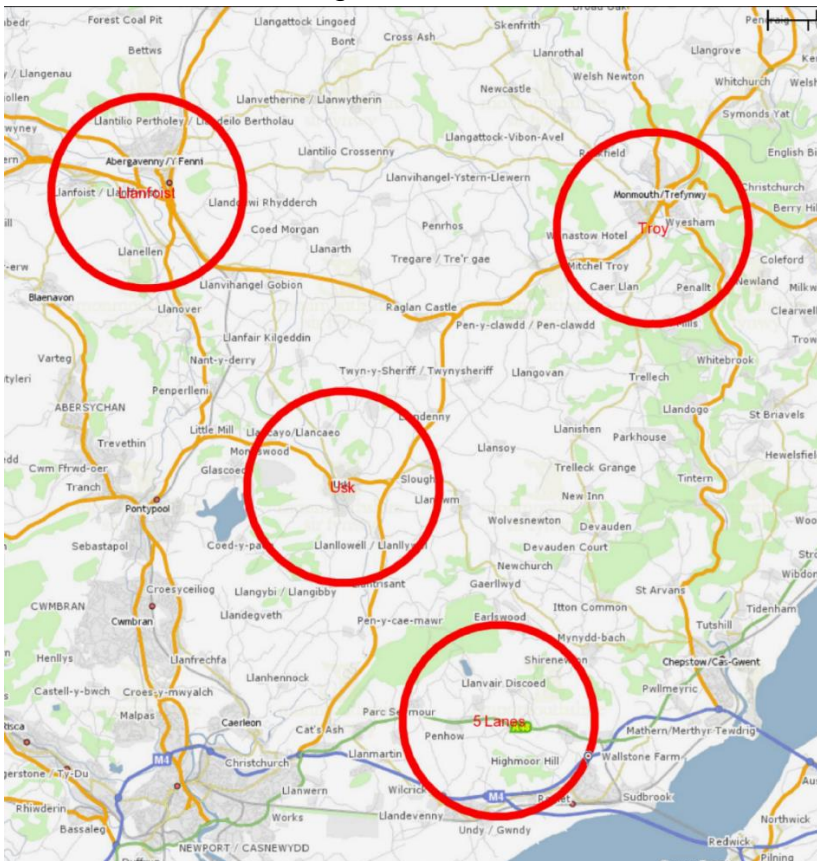
- 5.1 It is recognised that the facility at Usk is highly regarded by a large number of local residents. Following the announcement of the planned closure in December 2019 an on-line petition on Change.org was launched to keep the facility open. Change.org is a global petition platform. The petition has 2000 signatures but almost 1500 are not located from within Monmouthshire.
- 5.2 Usk Town Council have submitted a report to the Council highlighting the reasons why the site should not be closed and potential options that should be reviewed. The report from Usk Town Council is provided with Appendix 2 Strong Communities Select Report.
- 5.3 In addition, Usk Town Council have recently established an initiative and a local action group called Save Usk's Recycle Facility (SURF) which welcomes residents to share their views. It is unclear how SURF would achieve its claims of Improved Recycling, an Improved Health and Safety Executive, Reduced Costs and Improved Community but local support is strong and over 500 people signed the template letters and presented letters of support.
- 5.4 The main concern for residents was the distances they would need to travel to one of the other facilities. Most authorities across the UK work to National Assessment of Civic Amenity Sites (NACAS) report of 2004. NACAS suggest a "Maximum driving times to a site for the great majority of residents of 20 minutes in urban areas and 30 minutes in rural areas" NACAS suggest that this is reduced by 10 minutes where possible but recommend "At least one site per 143,750 residents, with a maximum throughput for any site of 17,250 tonnes per annum"
- 5.5 Only Abergavenny and Monmouth have an HWRC within the extended town area. Chepstow and Caldicot are major urban centres residents travel a 15 mile and 10 mile round journey to use Five Lanes. The picture below shows that over 99.9% of residents live within a 9 mile radius of Llanfoist, Five Lanes and Mitchel Troy (20 - 30 minute drive). The hatched circle is a 9 mile radius of Usk, it includes Llanfoist and Five Lanes sites and provides no additional coverage of Monmouthshire communities.





The Usk Town Centre Report request that sites should be maintained to service an area as described of 1987 households (a radius of 2.5 miles of Usk). If this coverage of existing sites was replicated it would leave huge areas across the county without services or require 14 sites across the county.

### 2.5 mile radius of exiting sites



- 5.6 From a wider Wales perspective, Torfaen, Blaenau Gwent and Newport residents are served by a single site in each county. Cardiff's 364,000 residents are served by two sites. Residents in Crickhowell travel a 28 mile round trip to their nearest facility in Brecon or 64 mile round trip to Llandrindod Wells when Brecon is closed.
- 5.7 The second concern from residents was increased flytipping. As can be seen in 3.2 there is little correlation between flytipping and HWRC provision. The largest increase in flytipping this year occurred when sites were re-opened across Wales.
- 5.8 It is important that we maintain a strong stance against flytipping. Mooted acceptance that people fly-tip if faced with 20-30 minute drive times to their nearest facilities is totally unacceptable. The majority of flytipping in Monmouthshire is car boot and small van loads in relatively inaccessible areas, many will have driven in excess of 20 minutes to get there.
- 5.9 Usk Town Councils main concern in their joint letter with the SURF group was around consultation. The survey into Future Provision of HWRCs was promoted on both the Usk Town Council Facebook page and on the Change.org petition. It was also promoted widely at the sites, on social media and covered by the local press. 959 residents responded with 182 stating they used the Usk Facility.
- 5.10 They suggest that the report does not give any reason or rationale for the closure of Usk and contains no options appraisal. The report clearly sets out the reasons as poor performance, cost savings, Health and Safety concerns and the rationale to close the site to improve recycling rates and reduce risks of potential recycling fines from Welsh Government. Full options appraisal on all recommendations was contained in the report in 4.0 Options Appraisal
- 5.11 They suggest that some of the statements in the Report to Strong Communities were not sufficiently evidenced relating to increased recycling with the closure of the sites through Covid. The data sets in the reports are taken from the returns to Welsh Government through Waste Data Flow and accurately reflect the current position.
- 5.12 Usk Town Council accept that doing nothing is not an option but ask that the site is re-opened as a trial. Compositional analysis following the decision in December 2019 and Usk Town Council and Change.org petition identified a further reduction in recycling at Usk. The site is currently closed due to Covid. While the pandemic continues and restrictions remain Viridor and MCC Officers do not believe that social distancing and suitable cleansing regimes can be maintained on site.
- 5.12 Usk Town Council and some residents raised concerns about proposals to stop/reduce garden waste collections. There is no intention to reduce garden waste collection capacity and officers believe that separate proposals will improve and enhance the service for residents.

## **6.0 REASONS:**

- 6.1 The statutory recycling targets set out by Welsh Government are extremely challenging. It is recognised that increasing recycling can only be achieved by reducing easy options for rubbish disposal. Monthly collections of residual waste, closures of HWRCs, reduced capacity of residual collections are challenging but all deliver higher recycling and better environmental outcomes.
- 6.2 Changes to the way we operate the HWRCs in Monmouthshire are key to increasing overall recycling rates due to the higher than average volumes of waste that enter the sites. Diverting waste into the domestic kerbside recycling collections will benefit the climate change emergency work with fewer car journeys. Segregating black bags on site will change behaviour and further increase recycling.
- 6.3 The booking system makes people consider what they are buying and how they will dispose of their rubbish. For the first time there is accurate unequivocal data showing site usage patterns and capacity on sites. Working to known capacity rather than trying to meet perceived demand will ensure the Council can continue to provide more of the services our residents rely on.
- 6.4 Many residents have said that they now use Freecycle and other services to reuse material that they previously brought to site for disposal. Many have also commented that they think more carefully on the items they purchase since Covid 19. Consideration of the lifecycle, obsolescence and re-use of items is critical in creating a circular economy.
- 6.5 The costs of providing four recycling sites across the county places huge budgetary constraints on the waste section. A review of service provision based on site use, tonnages and capacity to improve carried out by Eunomia in 2017, Appendix to Strong Communities Select showed that Usk and Mitchell Troy are only sustainable long term with significant and costly improvements with particular concern regarding drainage and gantries in Usk.
- 6.6 There is a limited window of opportunity to benefit from a £40,000 in year cashable saving in 2020.

## **7.0 RESOURCE IMPLICATIONS:**

- 7.1 Continuation of the booking system is relatively straightforward using the existing portal. The portal is based on a bulky waste booking form and is clunky but sufficient and usable. Improvements are likely to incur some small additional costs as it's used by neighbouring authorities who would also benefit from a bespoke system. Although 80% of customers are self-servicing the increase in telephone enquiries at the Contact Centre is acknowledged. The booking system reduces peaks and troughs on site and this should be reflected in lower tender prices.

- 7.2 The closure of Usk would provide an in year cashable saving of £40,000 in 2020 and subsequent years in reduced management fees. There are £30,000 unbudgeted costs in reviewing the drainage and upgrading lights, gantries and surfacing should Usk reopen in 2020. There will be increased costs in kerbside collection but through Covid 19 these resources have been quantified and at current collection rates these are managed within existing rounds.
- 7.3 Revised opening hours of 08:00 to 16:00 in line with continuation of booking system will see a reduction in staffing costs of £140,000 compared to existing provision. These savings are based on MCC operating the service in-house.
- 7.4 The additional day closure at Llanfoist and Five Lanes will reduce staffing costs by £100,000 based on in-house provision.
- 7.5 Costs are saved by reduction in agency costs and overtime and should not impact existing staff wages. The existing contract is based on minimum wage while the proposed new contract is based on the living wage. Reductions in hours for staff on site is off-set by the increased hourly rate.
- 7.6 An additional re-use shop at Five Lanes is dependant Welsh Government funding. If successful, the income generation and subsequent profit will be invested in climate change emergency projects.
- 7.7 Retendering the HWRC and Transfer stations will need resources from the council's legal, finance and procurement departments. At this stage the financial costs are unknown but it is anticipated that a like for like service provision would increase costs. The continuation of the booking system, the closure of Usk and reduced opening hours being included in the tender documents will reduce tender prices and contact costs going forward. Clarity on future service provision will ensure the market can provide the most economically advantageous tender position for MCC. The procurement of a 10 year contract with an estimated value of £15m will be supported through Atebion, clarity on all aspects of the contract will reduce complexity and costs of procurement for all parties.

## **8.0 WELLBEING OF FUTURE GENERATIONS IMPLICATIONS (INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING):**

- 8.1 The changes to the services proposed or to be considered further as a consequence of this report have significant positive contributions to make to the Wellbeing Goals. In particular it has strong benefits for a Prosperous Wales, by supporting the ongoing development of a low carbon economy. There is also potential to contribute to Cohesive Communities, by working collaboratively and in partnership with our communities to reduce the impact that waste has upon our communities.
- 8.2 There are no significant positive or negative impacts on the protected characteristics, safeguarding or corporate parenting. The principles of Long term, Prevention,

Integration, Collaboration and Involvement have been used throughout the development of these proposals.

- 8.3 It is clear that the closure of the Usk facility is strongly opposed by a number of local residents and Usk Town Council. Perceived negative impacts on the community of Usk would be offset with improved air quality, additional parking close to the high street for businesses and improved recycling rates across the county.

## **9.0 EVALUATION CRITERIA**

- 9.1 Measures used to measure the success of the proposals will include.
- An increase in the proportion of waste received at HWRCs which was recycled;
  - A reduction in average operating costs of HWRCs;
  - Maintenance of fly tipping at or below current levels
  - Increased levels of residents self-servicing for bookings
  - Capacity and headroom for bookings maintained at +10%

## **10.0 CONSULTEES:**

Cabinet Member  
Strong Communities Select 2019 and 2020  
All Member waste workshop 2020  
Soft market testing of the potential contractors

- 10.1 Consultation on Monmouthshire's Household Waste Recycling Centre provision was undertaken from March 10th to April 10th 2020. This was promoted on social media, the press and through Usk Town Council. 959 responses were received, the results are shown in an appendix to this report and were used to inform the development of the recommendations.
- 10.2 The proposals were subject to pre-decision scrutiny at a special meeting of the Strong Communities Select Committee on Monday 28th September 2020. The chair invited councillors who were not members of the committee to participate in the discussion. The Committee also welcomed views via the public open forum, as this was a video meeting these were pre-recorded, however Usk Town Council were able to make a live video contribution from County Hall in Usk. Several hundred written submissions were received and circulated to committee members in advance.
- 10.3 Having heard contributions and received evidence from the public, the committee received an overview of the proposals, questioned officers and raised a number of challenges regarding the proposed closure of the Usk facility. These included increased likelihood of fly-tipping and the distance that residents would need to travel to access alternative sites. While broadly supportive of most of the recommendations, the weight of opinion within the committee was marginally against the officer recommendations to close the Usk site with the discussion reflecting a broad range of views. Having considered all of the matters raised

alongside the existing evidence on the low levels of recycling, the difficulties of improving the existing site and availability of kerbside recycling, officers continue to hold the view that the closure of the Usk site is the appropriate course of action to achieve challenging statutory recycling targets and improve recycling behaviours.

**10.4** Given the extent and depth of debate the chair of the committee will be invited to Cabinet to present a summary of the committees discussions.

**11.0 BACKGROUND PAPERS:**

WLGA Benchmarking Finance Data 2015/16 and 2017/18

Eunomia Study into Monmouthshire County Council HWRC provision

WRAP and HSE – Black bag sorting guidance

WRAP Report into HWRC Provision

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