

SANDBACH TOWN COUNCIL

Response to Cheshire East Council's (CEC) Consultation on Household Waste Recycling Centre (HWRC) Provision

1. Introduction

- 1.1 CEC has a STATUTORY DUTY to provide HWRCs.
- 1.2 CEC Municipal Waste Management Strategy Objective is "to maintain the role of HWRC and maximise recycling and reuse of items". CEC has achieved the highest recycling rate compared to 11 similar/benchmarked local authorities with its current facilities and model.
- 1.3 HW Martin Waste Ltd manage all CEC HWRCs on a performance based contract which is due for renewal in 2018.
- 1.4 Sandbach is a growing town and so the future need for HWRC provision locally will be greater. Hence closing Arclid does not make sense.

2. Key points

There are a large number of concerns, discrepancies and bias within the report which draws into question its validity.

- 2.1 CEC is aware of the need for improvements in some sites, but costs are not included within the report, so the full cost implications cannot be considered.
- 2.2 Increase in fly tipping as a result of closure of centres is acknowledged but the increased costs in dealing with this is not included in the report. These could well be considerable.

The report suggests taking on 2 additional enforcement officers to deal with additional fly tipping, but they would not be able to stop the fly tipping and hence the considerable additional costs of removing tipped items.

- 2.3 Other costings not included in the report are stated in Appendix 3 HWRC Policies, Details and Assumptions p.43. "The actual savings will be dependent **on how HW Martin calculates savings associated with each site.** Conversely, the costs of the closure of a site will need to be absorbed elsewhere within the network are 95% of site waste arisings and 50% of site service fee".

So the savings stated may not actually materialise, or may be very different.

- 2.4 The report states that Arclid and Congleton are the most expensive sites to run based on throughput and cost, but the figures quoted do not show the true situation for Arclid.

Arclid was previously far more cost effective to run but a change of policy by H. Martin/CEC has doubled the number of skips required, thereby greatly increasing costs. Arclid was previously far more efficient, since it compacted waste on site and so required half the number of skips to hold the waste. A re-introduction of compacting would decrease Arclid's costs making it less expensive to run.

2.5 Arclid is described as “the least efficient site” but there are no figures provided for people to look and consider. Indeed Arclid is consistently in the top 3 HWRC league table for Recycling Efficiency, in the report it is stated as second at 79% compared to Alsager at 81.4%. In December Arclid's efficiency level was 81%. Arclid can be shown to be the MOST efficient based on recycling efficiency- when it is ALWAYS in the top 3 sites for recycling levels.

2.6 Arclid can be shown to be the MOST efficient based on size of site against tonnage throughput

<u>Site</u>	<u>Size m2</u>	<u>Tonnage 2015/16</u>	<u>Tonnage per m2 site area</u>
Arclid	876	2648	3.0
Alsager	6240	4652	0.76
Crewe	9510	11762	1.2

2.7 Savings (Table 5 Costs and Savings p.21 of Resources Futures report)

Closure of Arclid saves only £120,064

Closure of Congleton saves more- £126,764

Closure of Poynton saves £111,700

The much higher percentage of savings suggested in the report come from rubble charges, reduced opening hours, commercial waste centre.

Is it worth closing Arclid or other sites for such little savings, which may well be spent on collections from fly tipping and capital expenditure on other sites to cope with the increase diverted from Arclid?

2.8 The report states that Congleton is the most expensive site to run (alongside Arclid) based on throughput and cost, but there is no mention of closing Congleton.

Congleton site is leased, but all other sites are owned by CEC.

2.9 A third of Poynton's catchment area is outside CEC boundary, which means that CEC will be handling waste from outside CEC.

All of the Poynton HRWC catchment area, that is within the CEC boundary, is contained within 2.5 mile radius of Bollington HWRC, so could be catered for at Bollington upon closure of Poynton, thereby eliminating CEC taking non CEC resident waste via Poynton.

- 2.10 Resources Futures review of all the sites provides details of how the sites operate. All sites were visited **with the exception of Arclid and Congleton**. Both these sites were reviewed based on a desktop study of previous reports and discussions with council staff, which appears to bias the report.
- 2.11 Waste Resources Action Partnership provide guidance for level of provision as maximum catchment for a large proportion of the population of 3-5 miles and yet the Resource Futures Report suggests that if 86% of households were within 6 miles of an HWRC (as per their scenarios) this would be acceptable.
- 2.12 In planning for the future, the report assumes 1500 homes per annum built, **distributed evenly within the authority**. This does not acknowledge the 34% increase in houses to be built in Sandbach in the coming years and so an increase in the need for HWRC provision locally.
- 2.13 Table 11 p.32* shows Number of households closest to each site, with Arclid having much higher figures than Alsager, Middlewich and Poynton - and yet Arclid is the site proposed to be closed.
- 2.14 Bias in the report can be illustrated clearly in Appendix 3 HWRC Policies, Details and Assumptions p.43 "Arclid is the smallest site, with the smallest throughput (**actually very close figures to Middlewich**), the smallest population nearby (**not according to their own figures in Table 11 p.32 as above***), but is the most expensive site to manage (**based on the change in policy by H. Martin/CEC which has caused the increase in costs**).
- 2.15 There are other ways to increase income from waste recycling, which should be considered in preference to site closures-

Metal recycling- Metal items stripped and sorted by metal type would increase £ per tonne from £45 to £100 approx.
- 2.16 What will be the effect on other tips if Arclid closes? Could they cope with the increase in volume/traffic?
- 2.17 The closure of Arclid will be pressure on other sites, increasing journey times forcing extra burning of fossil fuels and traffic levels. There will be a negative impact on air quality

Conclusions

1. Sandbach Town Council oppose the plans to close Arclid HWRC until a viable alternative is available. Sandbach residents need to have close access to a HWRC.

2. The conclusions reached by Cheshire East in its Report are flawed and based on incomplete information and misinterpretation of key details.
3. Sandbach Town Council should request a meeting with representatives of CEC to reinforce its representation regarding proposals to close the Arclid site and to discuss other options that may be being considered by CEC.

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