

Service and Community Impact Assessment (SCIA)

Front Sheet:

Directorate and Service Area:

Environment and Economy, Environment and Resource Efficiency, Waste Strategy

What is being assessed (eg name of policy, procedure, project, service or proposed service change):

Household waste recycling centre strategy consultation

Responsible owner / senior officer:

Rachel Burns

Date of assessment:

August 2015

Summary of judgement:

This SCIA does not consider the day to day usage of sites, but the impacts of changes proposed in the strategy consultation (for day to day usage please see separate SCIA). This assessment indicates that the proposed reduction in the number of sites means that some residents will live further from a HWRC, raising travel costs and increasing reliance on their car. The proposal may also impact on those residents who do not have a car and need to rely on friends, family and neighbours to access sites.

Residents will be encouraged to make full use of their kerbside collection services to reduce the need to travel to sites and to combine trips with other journeys wherever possible. Residents will also be directed to the district bulky waste collection services or retailer take back schemes to dispose of larger items.

Detail of Assessment:

Purpose of assessment:

There is an agreed saving of £350k from the HWRC budget from 2017/18. A consultation on changes to the service will be carried out in summer 2015 for implementation beginning in 2016.

The consultation covers a reduction in the number of sites, changing the location of sites so they are better located for the population centres within Oxfordshire and changing opening hours so they better suit usage patterns.

Section 149 of the Equalities Act 2010 (“the 2010 Act”) imposes a duty on the Council to give due regard to three needs in exercising its functions. This proposal is such a function. The three needs are:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic, and those who do not.

Complying with section 149 may involve treating some people more favourably than others, but only to the extent that that does not amount to conduct which is otherwise unlawful under the new Act.

The need to advance equality of opportunity involves having due regard to the need to:

- remove or minimise disadvantages which are connected to a relevant protected characteristic and which are suffered by persons who share that characteristic,
- take steps to meet the needs of persons who share a relevant protected characteristic and which are different from the needs other people, and
- encourage those who share a relevant characteristic to take part in public life or in any other activity in which participation by such people is disproportionately low.
- take steps to meet the needs of disabled people which are different from the needs of people who are not disabled and include steps to take account of a person’s disabilities.

The need to foster good relations between different groups involves having due regard to the need to tackle prejudice and promote understanding.

These protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity

- race – this includes ethnic or national origins, colour or nationality
- religion or belief – this includes lack of belief
- sex
- sexual orientation
- marriage and civil partnership

Social Value

Under the Public Services (Social Value Act) 2012 the Council also has an obligation to consider how the procurement of services contracts with a life value of more than £173,934¹ might improve the economic, social, and environmental well-being of the area affected by the proposed contract, and how it might act to secure this improvement. However, it is best practice to consider social value for all types of contracts, service delivery decisions and new/updated policies. In this context, 'policy' is a general term that could include a strategy, project or contract.

Context / Background:

Oxfordshire currently has 7 Household Waste Recycling Centres (HWRCs). In total the HWRC network costs £4.1 million to run; £1.2 million of this is spent on management fees, and the rest on transport and disposal / treatment gate fees. Over 1 million visits are made to the sites each year and 93% of users are satisfied/very satisfied with the service. The sites accept around 45,000 tonnes household waste/yr with an average recycling rate of over 70%. Oxfordshire County Council (OCC) has a duty to provide residents with 'reasonable access' to HWRCs under the Environmental Protection Act 1990 (EPA).

In February 2014, budget savings of £350,000 by 2017/18 were agreed from the HWRC budget, as part of the Council's Medium Term Financial Plan (MTFP). The strategy will therefore also need to set out how these financial challenges can be met without increasing financial pressures elsewhere (e.g. waste disposal costs).

There are a number of other pressures that a strategy will need to address: Alkerton and Stanford HWRCs have limited planning permission, and Ardley will be closed by the landowners in 2017. All sites are currently nearing capacity and population growth will require a number of sites to be expanded or replaced. The contract for the management of HWRCs requires re-procurement in 2017 and is likely to result in increased management costs due to the changes in the materials markets.

Proposals:

Oxfordshire County Council needs to achieve a financially sustainable network of household waste recycling centres that can be delivered within the agreed future

¹¹ [EC Procurement Threshold for Services](#)

budget. All the county's existing HWRCs are nearing capacity and need to be either expanded or replaced.

Our proposal for a future HWRC network in Oxfordshire is to:

- Reduce the overall number of sites from seven to either three or four
- Locate sites as close as possible to population centres
- Limit as much as possible the drive times for residents

We propose that there should be a minimum of three HWRCs in Oxfordshire and that these should be located near to population centres and take into account areas of planned growth in the county.

Evidence / Intelligence:

HWRCs are used by all members of the community and changes therefore have the potential to affect all residents.

We have used data gathered from several years of customer satisfaction surveys and traffic monitoring data to assess the usage patterns of HWRCs. Waste analysis and tonnage data has helped us to identify the types of materials taken to site.

We know that on average households visit a site 4 times a year and bring around 50kg of waste with them each time. Around 9% of this could be recycled in their kerbside dry recycling bins and 19% of this is green waste. Around 4% of this could have been collected through the district council's bulky waste collection service. Visits to site have fallen by over 300,000 since 2009 when districts introduced their comprehensive kerbside collection systems and people have needed to travel to site less frequently.

In 2011 as part of a previous HWRC strategy we shut our smallest HWRC Dean Pit. The risk of an increase in flytipping was a serious concern for residents and we addressed this through comprehensive communications and enforcement messages. A significant increase in flytipping was not seen.

We have also used information from other authorities, both when considering how to achieve the savings necessary and when looking at the potential consequences of changes on residents.

Alternatives considered / rejected:

The current network of HWRCs is no longer sustainable, all sites are nearing capacity and land ownership and planning constraints at several sites mean that changes are needed in the short term. OCC also has serious financial pressures and needs to make £350,000 savings from the HWRC budget by 2017/18. We need a sustainable network of sites that can be provided for the budget available and meets the current and future needs of residents.

A wide range of options have been considered to try and achieve the savings needed including partnering with other authorities and the private sector. Charging for access has been suggested by a number of residents in the past as an alternative to closing sites, but legislation prevents OCC from doing this. Income

generation through reuse, or by charging companies to deposit waste at sites will form part of the new strategy but the level of income generated is not guaranteed and unlikely to be enough to prevent other changes from being required.

A summary of options considered is presented as an Annex to the consultation document.

Impact Assessment:

Identify any potential impacts of the policy or proposed service change on the population as a whole, or on particular groups. It might be helpful to think about the largest impacts or the key parts of the policy or proposed service change first, identifying any risks and actions, before thinking in more detail about particular groups, staff, other Council services, providers etc.

It is worth remembering that 'impact' can mean many things, and can be positive as well as negative. It could for example relate to access to services, the health and wellbeing of individuals or communities, the sustainability of supplier business models, or the training needs of staff.

We assess the impact of decisions on any relevant community, but with particular emphasis on:

- Groups that share the nine protected characteristics
 - age
 - disability
 - gender reassignment
 - pregnancy and maternity
 - race – this includes ethnic or national origins, colour or nationality
 - religion or belief – this includes lack of belief
 - sex
 - sexual orientation
 - marriage and civil partnership
- Rural communities
- Areas of deprivation

We also assess the impact on:

- Staff
- Other council services
- Other providers of council services
- Any other element which is relevant to the policy or proposed service change
- How it might improve the economic, social, and environmental of the area affected by the contract **if** the Public Services (Social Value) Act 2012 applies

Impact on Individuals and Communities:

HWRCs are open to all members of the public. A SCIA is regularly reviewed in order to ensure that there is no discrimination against any specific groups as a result of the operation of the sites, and it is not thought that the proposal to close sites will impact on this. The most recent SCIA can be provided by the waste management team on request. The SCIA has not been revisited as part of this document – only points that may be impacted by changes have been addressed below.

- **Age.**

- While opening hours may change as a result of the new strategy the site will always be open at the weekend and at various points during the week. This may impact on those of working age with shift patterns that do not match opening hours, but sites will still be available for around 45 hours a week.
- Driving to site is a necessity if householders cannot drive, do not own a car or have given up their licence this restricts their use of a HWRC. Currently walking onto site is not allowed for safety reasons; however, as sites are redeveloped this will be reviewed with consideration for pedestrian access.
- If customers are unable to drive and make contact with the Waste Management Group they are encouraged to ask neighbours or family to help them take materials to HWRC. Customers are also directed to the district councils who offer bulky waste collection services. For those in rural areas that may have to travel further to a HWRC in the future, neighbours and family may be more reluctant to help out increasing the reliability of residents on paid for district bulky waste services or paying for a taxi to travel to site.

- **Disability**

- HWRC sites require householders to drive to site and therefore could affect people with a disability that prevents them from driving. It is noted however that people who are unable to drive due to a disability would require assistance with other aspects of their everyday life. Therefore, if a householder called to ask about disposal of materials not collected at the kerbside, we would ask if a carer, friend or relative could assist and if not point them to the bulky waste collection service offered by the district councils.
- If customers are unable to drive and make contact with the Waste Management Group they are encouraged to ask neighbours, family or a carer to help them take materials to HWRC. Customers are also directed to the district councils who offer bulky waste collection services. For those in rural areas that may have to travel further to a HWRC in the future, neighbours and family may be more reluctant to help out increasing the residents reliability on paid for district bulky waste services or paying for a taxi to travel to site.

- **Gender reassignment**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Pregnancy and maternity**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Race – this includes ethnic or national origins, colour or nationality**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Religion or belief – this includes lack of belief**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Sex**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Sexual orientation**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Marriage and civil partnership**
 - No specific impact foreseen as a result of the changes proposed in the consultation
- **Rural communities**
 - HWRCs are historically located on landfill sites, normally in rural areas, and this has provided rural communities with easy access to recycling while forcing those in centres of population to drive out of town to deposit materials. This consultation proposes a fundamental shift in this principal and will locate sites near to centres of population.
 - This change will mean that those in rural areas will have to drive further to reach a site, increasing their reliance on their car. We would encourage residents to combine their trips to the HWRC with other journeys, visiting when they are passing sites for another reason rather than making a specific trip.
 - If customers are unable to drive and make contact with the Waste Management Group they are encouraged to ask neighbours, family or a carer to help them take materials to HWRC. Customers are also directed to the district councils who offer bulky waste collection services. For those in rural areas that may have to travel further to a HWRC in the future, neighbours and family may be more reluctant to help out increasing the residents reliability on paid for district bulky waste services or paying for a taxi to travel to site.

- **Areas of deprivation**

- It is acknowledged that some residents will need to travel further to visit a HWRC, and increased travel costs could discriminate against those on a low income. We encourage residents to combine their trips to the HWRCs with other journeys to reduce the impact of this.
- Onsite sales of reusable items at some of the HWRCs provides a means of purchasing items at low cost which could have a positive impact in areas of deprivation. Where reusable items are donated to a charity these can be purchased off site at low cost.
- If customers are unable to drive and make contact with the Waste Management Group they are encouraged to ask neighbours, family or a carer to help them take materials to HWRC. Customers are also directed to the district councils who offer bulky waste collection services. For those in rural areas that may have to travel further to a HWRC in the future, neighbours and family may be more reluctant to help out increasing the residents reliability on paid for district bulky waste services or paying for a taxi to travel to site.

- **Overall**

The proposal to reduce the number of sites from seven to three or four across the county, and to locate HWRCs near to centres of population, will mean that those in rural communities and in towns not near the remaining HWRCs will feel a greater impact than those close by. We expect that people will combine their trips to the HWRCs with other journeys to reduce the impact of this.

All site users have to access the HWRCs by vehicle, there is currently no pedestrian access to any of our HWRCs, so while journey times will be extended, no additional users should be excluded by this proposal. Increasing the travel distance will impact on those with limited income.

During previous HWRC consultations, residents have expressed concern that the closure of sites will lead to increased fly tipping. Evidence gathered from the closure of Dean Pit in 2011 does not support this claim; no significant rise in fly tipping in the local area was seen. For a number of years Oxfordshire Waste Partnership, and its successor Oxfordshire Environment Partnership, have run coordinated communications and enforcement campaigns to keep fly tipping levels low. These campaigns would continue however there is a risk that reduction in site number may result in a fly tipping increase.

Impact on Staff and providers:

It is likely that levels of abuse would increase at sites for staff at the HWRCs who deal with disgruntled members of the public who want the sites to remain open.

Complaints would be directed to county council office staff, increasing the volume of calls and complaints received.

Mitigation

The communications and complaints procedures used for the closure of Dean Pit can be utilised to handle any comments that site staff may receive.

Site staff will be encouraged to direct all comments to office staff who are able to deal with complaints but on occasion residents can become extremely frustrated and their physical and verbal behaviour towards site staff is unacceptable. Site staff receive regular training to help them manage and diffuse tense situations and this will be timed to help staff deal with any anticipated times of high complaint.

Office/HWRC management staff presence on site may also be required on site at certain points to help site staff deal with any comments. Office based county council Waste Management staff would need to be provided with adequate information to handle these comments and management support is essential to allow for the escalation of complaints when required.

Impact on other Council services:

Council premises and services produce commercial waste and therefore should not be depositing waste at HWRCs.

District council partners may experience greater volumes of material deposited at the kerbside. Where this material is recyclable we would maintain our high recycling and composting rate. However, there may be additional waste placed in residual bins, leading to a decrease in our recycling and composting rate. The county council currently has the highest recycling and composting rate of any county council in England.

As Waste Disposal Authority, the county council is responsible for the costs of residual waste disposal or treatment. An increase in residual waste would therefore increase the county council's costs.

For every tonne of recycling or composting that the district councils collect, the county council pays a statutory recycling credit. As waste is directed through the kerbside, rather than county council's HWRCs, recycling credit payments to the districts may also increase.

Mitigation

Oxfordshire County Council will work with the City and District councils on continuing communications with residents to encourage them to make full use of all their kerbside recycling systems. Communications will also highlight to residents where HWRCs are now located, their opening hours and encouraging them to combine journeys when needing to visit HWRCs.

District councils may also wish to open staffed bring sites that only accept recyclables in areas where HWRCs are closing. The county council can support these sites through promotion to residents. As above, for every tonne of recycling or

composting that the district councils collect county council pays a statutory recycling credit. If recyclables are directed through these sites, recycling credit payments to the districts may also increase.

Social Value

If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area.

How might the proposal improve the economic well-being of the relevant area?

While overall the number of sites may decrease across the county, remaining sites will be bigger meaning that there will still be a number of jobs available for site staff (the current contract employs around 40 people). There is a high turnover of site staff on some sites and, while the responsibility of the contractor, it is hoped that a reduction in the overall number of staff required can be managed through natural wastage rather than redundancies.

The overall strategy will incorporate reuse of goods from site, this will allow good quality, low priced goods to be made available to the general public for purchase, helping those on low incomes, or those looking for a bargain. This may also help reduce the need for new goods and the environmental impact associated with their production and manufacture.

Facilities to accept commercial waste will also be incorporated into new sites. This will provide local tradespeople with a way of disposing of differing quantities of trade waste legally and at a competitive price. With differential charging (cheaper to dispose of recyclables than residual waste) traders will be encouraged to separate material for recycling, having an environmental benefit as well as a financial one. This facility may also help traders economically.

How might the proposal improve the environmental well-being of the relevant area?

HWRCs help to increase the amount of goods recycled, reducing our reliance on virgin materials.

Action plan:

Summarise the actions that will be taken as a result of the assessment, including when they will be completed and who will be responsible. It is important that the officer leading on the assessment follows up to make sure the actions are completed, and updates the assessment as appropriate. Any significant risks identified should also be added to the appropriate service or directorate risk register, to ensure they are appropriately managed and reviewed.

Action	By When	Person responsible
Dealing with conflict toolbox talk to be scheduled	October 2015	Service Development Officer
Work with Districts on communications messages to encourage residents to use their kerbside recycling systems	Ongoing	Oxfordshire Environment Partnership Projects group
Work with Districts on flytipping enforcement messages to encourage residents to use their kerbside recycling systems	Ongoing	Oxfordshire Environment Partnership Enforcement Officers group
Work closely with the Service Development Team and Oxfordshire Environment Partnership to ensure wide dissemination of information relating to the HWRCs	Ongoing	Waste Strategy Officer
Once strategy published work with Communications team to ensure a detailed communications plan is in place for each site due to close/open	Determined by final strategy	Waste Strategy Officer and Service Development Officer

Monitoring and review:

Updates post consultation when final decision on Strategy is made – November – Jan 2015/16

Person responsible for assessment:

Version	Date	Notes (eg Initial draft, amended following consultation)
1	27/7/15	RB Initial draft
2	3/8/15	RB incorporating comments from AS