

Cabinet
26 June 2018
Appendix 1

HWRS Service ReviewPublic Consultation Analysis

Prepared in conjunction with

CONTENTS

1.	Executive Summary	5
2.	Introduction	7
3.	Summary of Results	9
	The Recycling Site You Use	
	Proposal 1 - to charge for certain waste types	
	Proposal 2 – to close part-time recycling sites	
	Proposal 3 – Changes to recycling site opening hours	
	Supplementary question – charging to enter sites	
	Your opinion of the recycling site service proposals	
4.	County Council's response to key themes	29
5.	Consultation Submissions from key stakeholders	38
	Local Authorities and Waste Partnerships	
	Members of Parliament	
	Parish Councils	
	Other Organisations	
6.	About You - Classification of Respondents	41
	Equalities Impact Assessment	
7.	Conclusions	48
Appe	ndix 1: Summary of consultation correspondence & petitions received	
Appe	ndix 2: List of organisations contacted	
Appe	ndix 3: Public Consultation Questionnaire	

1. Executive Summary

- 1.1 The County Council undertook a public consultation on proposed changes to the county's Household Waste Recycling Sites service from February to May 2018. This followed a thorough review of the sites carried out in 2017 which identified ways of making necessary savings of £720,000 to the annual Waste and Recycling budget.
- 1.2 The proposed changes consulted upon included:
 - charging for certain waste types that are not 'household waste', i.e. rubble, soil, plasterboard, tyres and asbestos,
 - closing the part-time recycling sites at Forest Row and Wadhurst,
 - changing recycling site opening hours to better suit demand and;
 - improving the layout of Hailsham recycling site.

The County Council considers these proposals should enable the necessary savings to be made while ensuring the provision of a good level of service for residents with reasonable access to a network of Household Waste Recycling Sites (HWRSs).

- 1.3 Respondents were invited to have their say on the proposed changes via a consultation survey which was completed by a total of 3,385 people. Almost half the responses to the survey were from users of the part-time sites proposed for closure at Forest Row and Wadhurst, and four petitions were also received against the site closures with a total of 6,794 signatures.
- 1.4 During the consultation period, 31 members of the public emailed the Council's Waste team directly, or wrote or phoned us with their comments. We also received representations from two MPs and 17 organisations, including Parish and District Councils and a neighbouring County Council.
- 1.5 Overall, just under a third of survey respondents (30%) found the proposals acceptable as a way to make savings, with just over half (55%) finding them unacceptable.
- 1.6 Proposal 1: to charge for certain waste types
- 1.6.1 A higher level of support was received for this proposal than for the proposed changes overall, and just over half (56%) of survey respondents felt it was broadly acceptable. Issues raised in response to this proposal included concerns about fly-tipping, comments around the items charged for and the level of charge and concerns that the effects of the proposal will cost the council more than it will save.
- 1.7 Proposal 2: to close the recycling sites at Forest Row and Wadhurst
- 1.7.1 In response to the site closure proposal, when asked if they agreed whether the ten remaining sites would provide a reasonably accessible service if Forest Row and Wadhurst closed, the majority of survey respondents, just over half (54%), broadly disagreed. However the views of local users of these two sites responding to the survey are different to those of all the survey respondents in general, as they would be most affected by the proposal to close. For those respondents that use either Forest Row or Wadhurst as their main site, almost all (99%) felt that closing their local site was unacceptable.
- 1.7.2 The principal concern raised was the potential for an increase in fly-tipping. The comments and petitions received in response to the proposals to close Forest Row and Wadhurst sites show that the sites themselves as a facility, along with the reuse shops, are highly valued by their users, and it was frequently raised that site closures would result in a negative impact on the community. Respondents also commented on the potential negative impact on recycling or the environment.

- 1.8 Proposal 3: to make changes to recycling site opening hours
- 1.8.1 There was considerable support for reducing opening hours at the sites overall during quieter times, and just over two-thirds (70%) of survey respondents thought that this was broadly acceptable.
- 1.8.2 When asked about opening Eastbourne and Crowborough sites for longer at the weekend and closing them during quieter times in the week, over two-thirds (70%) of respondents thought this was broadly acceptable, excluding those that said the question was not applicable and did not visit those sites. For those survey respondents that said they use Eastbourne or Crowborough as their main site, there was even more support for the proposal.
- 1.8.3 Comments in response to this proposal included support for weekend opening, but there were also concerns about the current or proposed times being inconvenient for those that work.
- 1.9 The three most frequent suggestions made for ways to improve recycling at the sites were to sell items brought to the sites to raise revenue; suggestions for alternative site opening hours/days, some suggesting that these changes (too) could make savings; and suggestions for other charges, to only charge for some items or that proposed charges are too high.
- 1.10 Overall the top five most frequently emerging themes in the comments from consultation survey respondents were: concerns about increases in fly-tipping; positive comments regarding a particular site (including how busy it is) and the negative impact on the community if proposals go ahead; concerns about a negative impact on the environment/recycling as a whole; suggestions for alternative site opening hours/days, some suggesting that these changes (too) could make savings; and comments that the remaining sites are too far away, or it will take too long to travel, some saying longer than 20 minutes.
- 1.11 Following our analysis of consultation responses and comments, we do not consider that new information has been presented that would lead us to withdraw our proposals. This would result in the introduction of charges for non-household waste at all sites, the closure of the part time sites at Forest Row and Wadhurst and subsequent reduction in network size from 12 to 10 sites, and the reduction in opening times at suitable sites. Through discussion with our contractor Veolia, we are exploring whether a full day closure at certain HWRSs would offer additional efficiencies over and above shorter times. Through discussions with Parish Councils we are also exploring how an HWRS could be operated by another organisation.
- 1.12 Overall, it is considered that the potential impacts of the service changes are likely to be small. The level of service we are proposing ensures that we comply with our statutory duties. Closing sites would reduce residents' access to a HWRS within 20 minutes' drivetime to an alternative site from 98.4% to 98.2% of homes. With the improvements to the Hailsham site and the additional weekend opening hours proposed for the Eastbourne and Crowborough sites, we feel that the proposals will ensure the provision of a good level of service for residents with reasonable access to a network of HWRSs to meet the needs of current and future users.

2. Introduction

- 2.1 Between 22 February and 15 May 2018 the County Council undertook a public consultation on proposed changes to the Household Waste Recycling Sites service in East Sussex. This followed a review of the sites carried out in 2017 which looked at a variety of information, including use of the sites and the Council's legal duties and identified possible ways of making savings while considering residents' needs, and continuing to provide residents with reasonable access to Household Waste Recycling Sites.
- 2.2 As a result of the review of Household Waste Recycling Site service, a number of changes were proposed, including:
 - charging for certain waste types that are not 'household waste', i.e. rubble, soil, plasterboard, tyres and asbestos,
 - closing the part-time recycling sites at Forest Row and Wadhurst,
 - · changing recycling site opening hours to better suit demand and
 - improving the layout of Hailsham recycling site.
- 2.3 These proposed changes would enable the County Council to make the required level of savings to the annual Waste and Recycling budget of £720,000 whilst maintaining a good level of service for residents. For the full Household Waste Recycling Site review, see Appendix 6 to the Cabinet report.
- 2.4 During the consultation, respondents were invited to have their say on the proposed changes listed above, by completing a consultation questionnaire. A total of 3,385 people responded to the questionnaire: 98.6% (3,336) of respondents completed the questionnaire online and 1.4% of respondents (49) completed a paper version of the questionnaire.
- 2.5 People also emailed the Council's Waste team directly or wrote in with their comments, and 36 representations via email and letter (and one phone call) were received after the start of consultation from members of the public, organisations and MPs. Twelve Parish Councils, a District Council and a neighbouring County Council also sent in representations (see Appendix 1 of this report).
- 2.6 There were also four petitions received against site closure, totalling 6,794 signatures. Prior to the start of the formal consultation period, two petitions against the closure of the Forest Row site were received from Forest Row Parish Council, amounting to 3,959 signatures, and two more petitions were received during the consultation period from Wadhurst Parish Council and Frant Parish Council against the closure of the Wadhurst site totalling 2,835 signatures.
- 2.8 In addition, officers have attended meetings with East Sussex County Council elected members, parish councils and members of the public. All of the comments, feedback and suggestions received during the consultation have been analysed and have helped to inform the final proposals for presentation to East Sussex County Council's Cabinet on 26 June 2018.
- 2.9 The response to the consultation questionnaire has been overwhelmingly from users of recycling sites (99% of respondents). A large proportion of responses (48%) were from users of the part-time sites at Wadhurst and Forest Row. Analysis of those responses where a postcode was given showed that around 5% of respondents were from outside the County.

- 2.10 In all, 30% of respondents found the proposals overall either "perfectly acceptable", or "acceptable" as a way to make savings, with a further 15% of respondents choosing 'neutral'. 55% of respondents found the proposals overall either 'Totally unacceptable' or 'Unacceptable'.
- 2.11 MCL, a locally-based transport and research consultancy, were appointed to provide data processing and analysis services in support of the consultation. This report is produced by the County Council in conjunction with MCL.
- 2.12 This report provides a complete analysis of all of the consultation questionnaires completed. It also includes the Council's response to the main issues raised in questionnaire responses and other forms of representations (e.g. email, letter and face to face meetings). Section 5 of the report also provides a summary of the representations from key stakeholders made outside of the consultation questionnaire.
- 2.13 A range of methods and media were used to publish and advertise the consultation, to try to ensure that as many people as possible were encouraged and able to give their views. The intention was to ensure participation from a wide range of interested members of the local population and representative groups.
- 2.14 The publicity included a press release, banners displayed at all East Sussex Household Waste Recycling Sites, leaflets and posters at the sites and at the county libraries, and promotion on the County Council's website and via social media. Various stakeholders were emailed directly to notify them of the proposals and the consultation, encouraging them to respond via the survey or in writing. These included the County, District and Borough Councils and councillors, Town and Parish Councils, MPs, our waste disposal contractor and a variety of relevant local third sector and public sector organisations (see Appendix 2 of this report).
- 2.15 The priorities and proposals were set out in the introduction to the consultation questionnaire, which is reproduced in full in Appendix 3 of this report. The questionnaire was available in different formats upon request, and included seven sections as follows:
 - 1. Use of service, and recycling site used most often;
 - 2. Proposal 1 to charge for certain waste types presently not charged for;
 - 3. Proposal 2 to close the part-time recycling sites at Forest Row and Wadhurst;
 - 4. Proposal 3 to make changes to recycling site opening hours;
 - 5. Supplementary question, the principle of a small charge to enter the recycling sites:
 - 6. Overall views and ranking of the proposals, and whether respondent is an individual or responding as part of an organisation;
 - 7. "About you" questions designed to allow us to make informed decisions, by helping us to ensure the views of different groups are represented.

3. Summary of Results

The overall responses to each of the questions asked are summarised below – questions 1 to 15 relating to the respondent's use of facilities and their views regarding the proposals being put forward.

Further questions (16 to 26) providing demographic and other personal information to assist in analysis and interpretation of the results are included in section 6, 'About You - Classification of Respondents'.

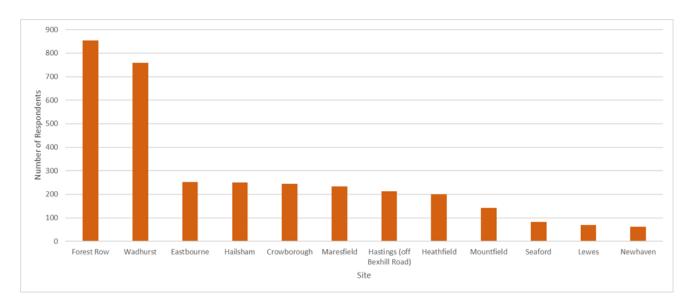
The Recycling Site you use

Q1. Do you use a household waste recycling site in East Sussex?

Response	Number of Respondents	Percentage
Yes	3,356	99%
No	28	1%
Total Number of Respondents	3,384	100%

Q2. If yes, which site do you use most often?

	Number of	
Response	Respondents	Percentage
Forest Row	853	25%
Wadhurst	759	23%
Eastbourne	252	8%
Hailsham	250	7%
Crowborough	244	7%
Maresfield	233	7%
Hastings (off Bexhill Road)	212	6%
Heathfield	199	6%
Mountfield	142	4%
Seaford	83	2%
Lewes	69	2%
Newhaven	62	2%
Not Answered	25	1%
Total Number of Respondents	3,383	100%



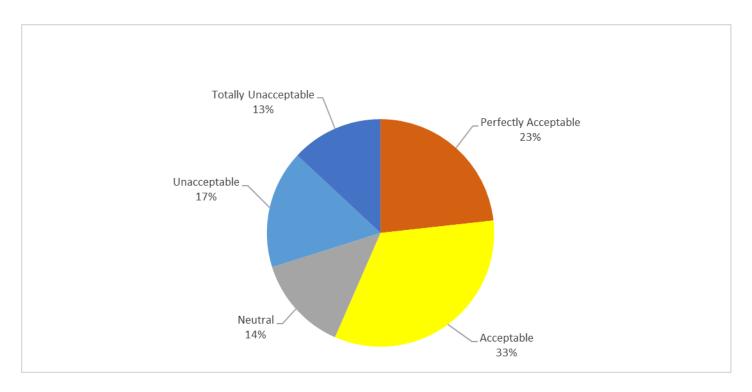
The response is overwhelmingly from users of the recycling sites, and it is also very clear that the proposal to close the part-time sites at Wadhurst and Forest Row has produced a much stronger response from those areas than from others. The survey shows that 47.6% of all respondents identified one of these two sites as the one they use most often.

The next section of the questionnaire sets out the proposals for possible changes to services, so that respondents could give their views in relation to each.

Proposal 1 - to charge for certain waste types presently not charged for

Q3. What do you think of the proposal to charge for the disposal of rubble, soil, plasterboard, tyres and asbestos to cover our disposal costs?

	Number of	
Response	Respondents	Percentage
Perfectly Acceptable	786	23%
Acceptable	1,134	33%
Neutral	458	14%
Unacceptable	566	17%
Totally Unacceptable	440	13%
Total Number of Respondents	3,384	100%



56% of respondents stated this proposal was either perfectly acceptable or acceptable, with 30% expressing dissatisfaction. Our analysis shows that respondents in the oldest age groups, 75-84 and 85+, were least likely to oppose the proposal, with 16% and 8% respectively finding it unacceptable or totally unacceptable.

Respondents were invited to record comments as free text in relation to each proposal. In relation to Proposal 1, the ten most commonly recorded themes, in order of frequency, are listed in the table below. The comments evidenced that a proportion of respondents linked their support of this proposal to a hope that its implementation would prevent closure of the Forest Row or Wadhurst sites. The top issues listed are addressed below table P1 and in 'The Council's Response to Key Themes' section 4.

Table P1 – Summary of main themes in relation to Proposal 1

Rank	Comment Theme	Quantity
1	There is a concern there will be an increase in fly-tipping	654
2	Suggests other charges/only charge for some items/charges too high	288
	The effects of the proposals will cost the council more than they will save (e.g. the cost of clearing up fly-tipping or the cost of staff to	
3	collect/administer the charges)	142
4	Agree with the Proposal	104
5	People don't want to pay any charges, either to dispose of non- household waste or to enter a waste site	103
6	We pay enough council tax to cover the cost of the sites/non-household waste items	70
7	Some items of non-household waste should be classified as household waste	58
8	Agrees with some of the proposals as long as it means threatened sites remain open	57
9	Comments regarding proposed non-household waste sack size / sack weight issues / sack costs	55

In total 1,306 people made comments relating to Proposal 1. The principal issue raised regarding this proposal is the potential for fly-tipping of the materials concerned, there was also a view that cost savings will be offset by additional cost in dealing with such consequences. Trade waste is not allowed into our recycling sites, but a number of people also raised concerns that some tradespeople are perceived as abusing the service, in some cases this extends to a view that these users ought to bear any additional costs that are to be introduced.

A large number of the *suggestions* received are around the detail of what charges should apply for what materials, and the proposed level of charges overall. The comments evidence that some feel the charges are too high, and some do not want to pay charges at all.

There were also a significant number of comments (161) in broad support for this proposal. A range of more general comments were made and there were also a number of themes identified comprised of comments raised by between one and 48 respondents.

Chargeable Waste Schemes for non-household waste at HWRSs are well established across England and Wales. A 2017 WRAP survey showed that 37% of responding authorities who are responsible for 421 HWRSs either charge already or are about to implement their scheme. A further 14% of the authorities have schemes under consideration. Introducing disposal charges would align East Sussex County Council's HWRS service with nearby authorities such as Surrey and Hampshire County Councils who both charge for non-household waste.

The charges we have suggested are in line with those charged by other councils and have been calculated to cover the costs of waste disposal and implementing the scheme, and no profit would be received. We are not currently planning to introduce entry charges at our recycling sites and this Government does not allow the Council to charge an entry fee to recycling sites.

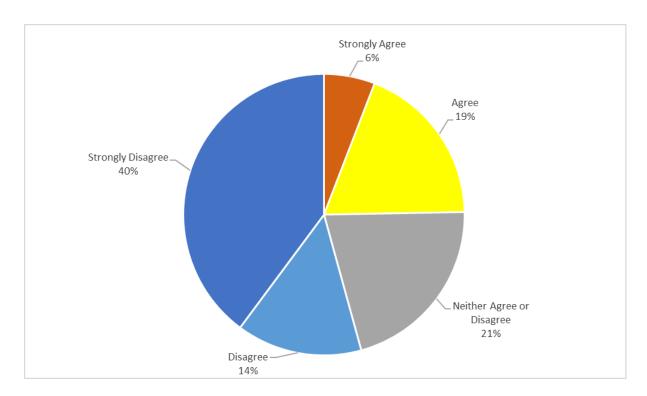
We gathered information relating to other authorities including some of our closest neighbours, who have implemented charging schemes at their sites, and found that fly-tipping has not directly increased as a result of those changes.

Some concerns were also raised about people burning waste, hiding it in refuse or disposing of asbestos irresponsibly. We would ensure that any publicity about a new scheme would include information aimed at preventing these potential impacts.

Proposal 2 – to close the part-time recycling sites at Forest Row and Wadhurst

Q5. If we closed Forest Row and Wadhurst recycling sites, do you agree the remaining ten sites across the county would give residents reasonable access to the service?

Response	Number of Respondents	Percentage
Strongly Agree	197	6%
Agree	633	19%
Neither Agree or Disagree	708	21%
Disagree	492	14%
Strongly Disagree	1,354	40%
Total Number of Respondents	3,384	100%

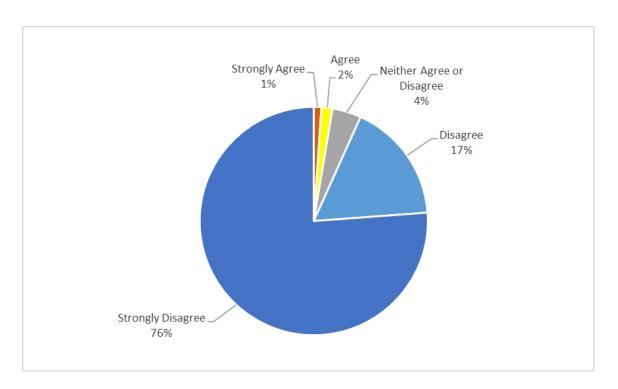


25% of respondents either agree or strongly agree with Proposal 2, but a majority of 54% did not agree. Almost half of all respondents to the consultation questionnaire record Wadhurst or Forest Row as the site they use most often, and the proposed closure of these sites is clearly an important issue for respondents, so it is not surprising that they have raised concerns here.

Given that the proposal to close the Forest Row and Wadhurst sites will most strongly affect the users of these sites, the response to question 5 has also been filtered by those respondents that selected these sites in answer to question 2 ('which site do you use most often?').

Q5. If we closed Forest Row and Wadhurst recycling sites, do you agree the remaining ten sites across the county would give residents reasonable access to the service? Analysis for respondents using Forest Row site most often

	Forest	
Response	Row	Percentage
Strongly Agree	9	1%
Agree	13	2%
Neither Agree or Disagree	34	4%
Disagree	149	17%
Strongly Disagree	648	76%
Total Number of		
Respondents	853	100%

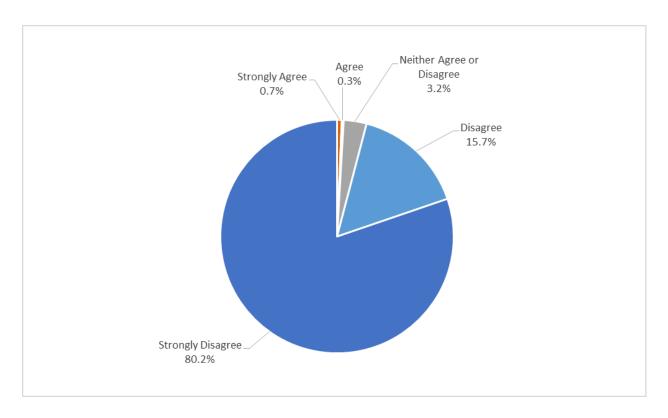


3% of Forest Row respondents either agree or strongly agree with Proposal 2, but the vast majority (93%) did not agree.

Q5. If we closed Forest Row and Wadhurst recycling sites, do you agree the remaining ten sites across the county would give residents reasonable access to the service?

<u>Analysis for respondents using Wadhurst site most often</u>

Response	Wadhurst	Percentage
Strongly Agree	5	0.7%
Agree	2	0.3%
Neither Agree or Disagree	24	3.2%
Disagree	119	15.7%
Strongly Disagree	609	80.2%
Total Number of		
Respondents	759	100%

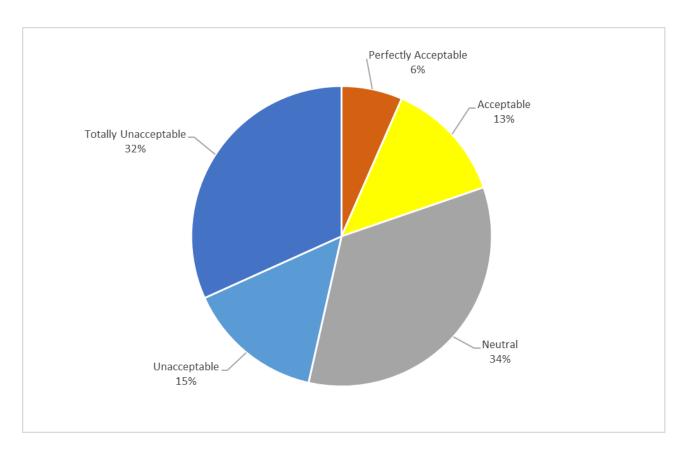


1% of Wadhurst respondents either agree or strongly agree with Proposal 2, but the vast majority (96%) did not agree.

Respondents were then asked what they thought of the proposal to close the Forest Row site (question 6) and the Wadhurst site (question 7). Responses to these are shown below, and it is clear that the pattern of response in each case is very similar.

Q6. What do you think of the proposal to close Forest Row Household Waste Recycling Site?

Response	Number of Respondents	Percentage
Perfectly Acceptable	222	6%
Acceptable	445	13%
Neutral	1,143	34%
Unacceptable	498	15%
Totally Unacceptable	1,074	32%
Total Number of Respondents	3,382	100%

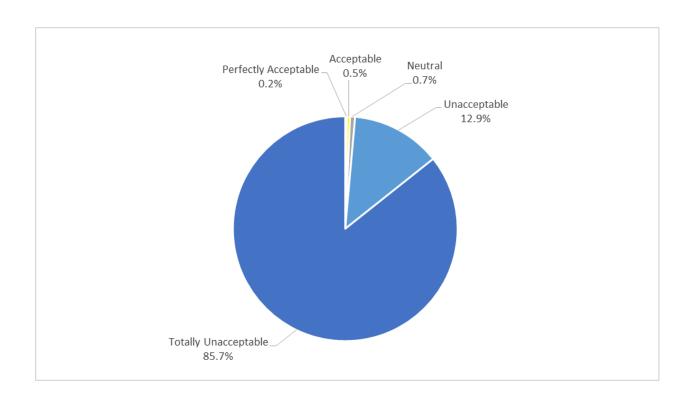


In the overall response here, a small majority find the proposal acceptable or are neutral, but 47% overall find it unacceptable or totally unacceptable. It is understandable that a significant proportion of respondents are neutral, being some of those that do not use the site at Forest Row.

Given that the proposal to close the Forest Row site will most strongly affect the users of this site, the response to question 6 has also been filtered by those respondents that selected this site in answer to question 2 ('which site do you use most often?').

Q6. What do you think of the proposal to close Forest Row Household Waste Recycling Site? <u>Analysis for respondents using Forest Row site most often</u>

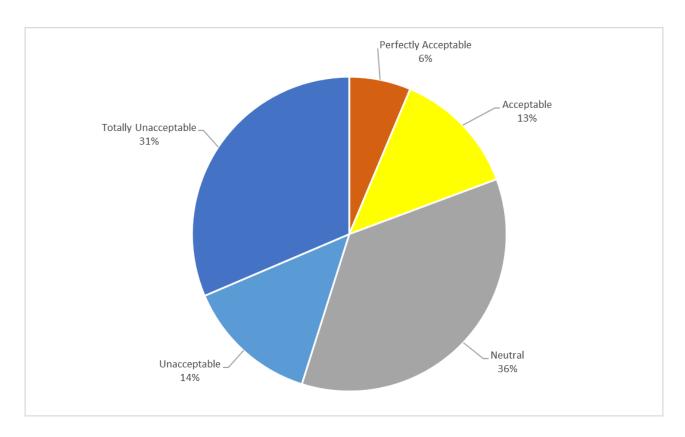
Response	Forest Row	Percentage
Perfectly Acceptable	2	0.2%
Acceptable	4	0.5%
Neutral	6	0.7%
Unacceptable	110	12.9%
Totally Unacceptable	730	85.7%
Total Number of		
Respondents	852	100%



With this filter applied, it is clear that the response from users of the site is very much against the proposal. Less than 1% found the proposal generally acceptable, with less than 1% of users being neutral and almost 99% finding it widely unacceptable.

7. What do you think of the proposal to close Wadhurst Household Waste Recycling Site?

Response	Number of Respondents	Percentage
Perfectly Acceptable	214	6%
Acceptable	439	13%
Neutral	1,201	36%
Unacceptable	464	14%
Totally Unacceptable	1,061	31%
Total Number of Respondents	3,379	100%

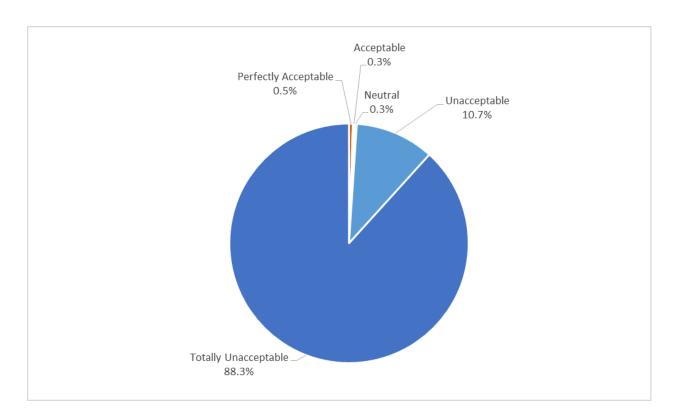


The response here is very similar to that for the Forest Row site. The most common response is neutral, but 45% find the proposal unacceptable or totally unacceptable, as opposed to 19% who find it acceptable or perfectly acceptable.

Again, given that the proposal to close the Wadhurst site will most strongly affect the users of this site, the response to question 6 has also been filtered by those respondents that selected this site in answer to question 2 ('which site do you use most often?').

Q7. What do you think of the proposal to close Wadhurst Household Waste Recycling Site? Analysis for respondents using Wadhurst site most often

Response	Wadhurst	Percentage
Perfectly Acceptable	4	0.5%
Acceptable	2	0.3%
Neutral	2	0.3%
Unacceptable	81	10.7%
Totally Unacceptable	670	88.3%
Total Number of		
Respondents	759	100%



The filtered response is almost the same as with Forest Row site users in relation to that site. Although a small proportion, almost 1%, did say they found the proposal to be perfectly acceptable or acceptable, less than 1% were neutral and 99% of Wadhurst site users found it to be broadly unacceptable.

As with proposal 1, the table below sets out the ten most commonly expressed views in relation to Proposal 2, in order of frequency. The top issues listed are addressed below table P2 and in 'The Council's Response to Key Themes' section 4.

Table P2 – Summary of principal comments submitted in relation to proposal 2

Rank	Comment Theme	Quantity
1	1 There is a concern there will be an increase in fly-tipping	
2	Positive comments regarding a particular site (including how busy it is), there will be a negative impact on the community if proposals go ahead	451
3	There is a concern there will be a negative impact on the environment/recycling as a whole	441
4	The remaining sites are too far away, it will take too long to travel, some have said longer than 20 minutes	351
5	There will be an increase in traffic/congestion	188
6	Don't want to use the other sites, difficulties in accessing them (other than transport issues)	113
7	Suggestions for alternative site opening hours/days, some suggesting that these changes (too) could make savings	91
8	It will cost too much to travel to other sites (most say this is due to petrol costs)	90
9	This proposal doesn't affect me	83
10	The remaining sites will not cope well with the extra demand - too small, too busy or opening hours too restricted	82

In total 1,612 people made comments relating to proposal 2, significantly more than for the other proposals.

The principal concern raised was that changes to the service could cause an increase in fly-tipping in East Sussex. We recognise that this proposal raises genuine concerns over what the impacts of the change might be.

We analysed the impact of changes to the HWRS service that we made following our last review. In 2014 three of our twelve sites moved from full-time to part-time opening hours and we found that our own tonnage data and reports made to the Government by our district and borough councils showed that both fly-tipping incidents and fly-tipped quantities by weight had decreased since the opening hours were reduced.

East Sussex County Council will continue to closely monitor levels of fly-tipping and take appropriate action with all relevant partner authorities and agencies to ensure implementation of any proposals does not have a negative impact on the environment. Publicity regarding potential site closures would include information aimed at preventing people from disposing waste illegally or irresponsibly, such as fly-tipping or burning.

The comments showed that the Forest Row and Wadhurst sites themselves as a facility, along with the reuse shops, are highly valued by their users, and some respondents raised concerns about the effect on the local community if the closures go ahead. We recognise that both sites are highly thought of by residents in both areas and that these residents would be most affected if the sites were to close.

One purpose of the HWRS review was to identify which sites were of the greatest strategic importance to the county. Forest Row and Wadhurst current open three days per week and are the least busy sites in the network in terms of visitors and tonnages collected, and relatively more expensive to run.

Many respondents commented that there would be a negative impact on recycling or the environment as a result of any changes made. Residents in East Sussex recycled 44% of their waste in 2016/17. This is a great achievement and in line with the national recycling average. In addition, East Sussex is one of the highest performing authorities in the country for minimising waste sent to landfill. Affected residents of Forest Row and Wadhurst would be able to access other local HWRSs in addition to the normal kerbside collection services for waste, bulky items, recycling and garden waste.

It was raised that the remaining sites are too far away and will take too long to travel to. We appreciate that should the two proposed sites close, drive time to an alternative would increase for residents of Forest Row and Wadhurst and some of the surrounding settlements. However in overall county terms, modelling for the accessibility study within the HWRS Review Report shows that 98.4% of East Sussex residents currently have access to an HWRS within a 20 minute drive. Closing the proposed sites would still provide access to a site within a 20 minute drive for 98.2% of the county's population.

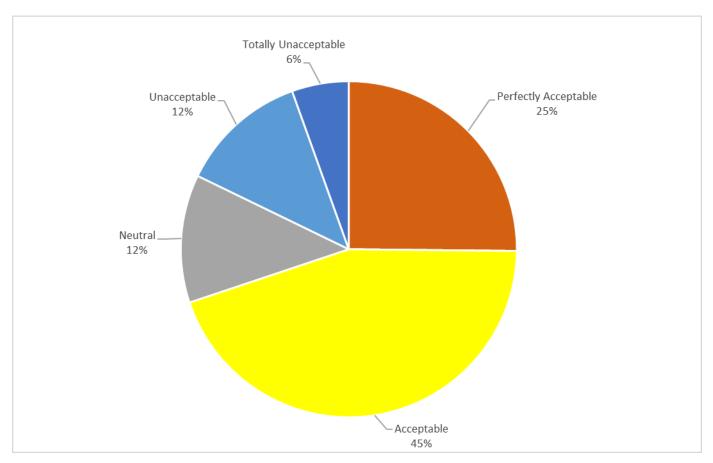
There were also concerns raised that closures will lead to more traffic on roads and more congestion at the 'next-nearest' sites. Other nearby sites within the network, including Crowborough, Heathfield, Maresfield and Mountfield will be able to receive the additional visitors and waste from the Forest Row and Wadhurst recycling sites. Should the two sites close, we will work with our contractor to monitor whether congestion is arising at the alternative sites and if any mitigation is needed.

There were also a number of themes comprised of comments raised by between one and 81 respondents.

Proposal 3 – Changes to recycling site opening hours

Q9. Thinking about the times you would want to visit the recycling sites, what do you think of slightly shorter opening times?

Response	Number of Respondents	Percentage
Perfectly Acceptable	850	25%
Acceptable	1,512	45%
Neutral	417	12%
Unacceptable	418	12%
Totally Unacceptable	186	6%
Total Number of Respondents	3,383	100%

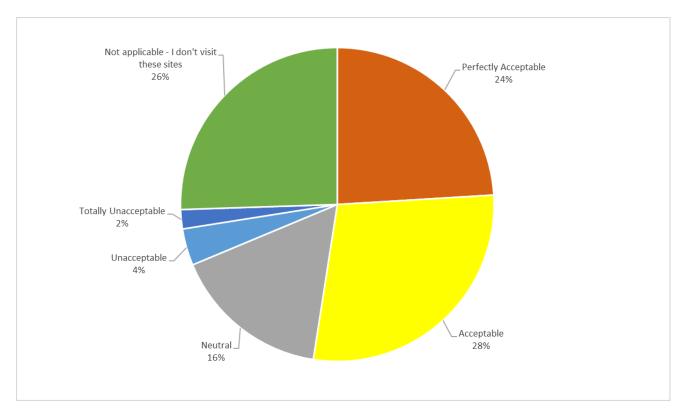


70% of respondents indicate support for proposal 3 in principle, and 12% are neutral, with 18% registering objections. Of the different age groups responding, those aged over 65 were less strongly opposed to the proposal, compared to those of working age, with 12% registering objections. The service could become less accessible for the proportion of the population who work at weekends and/or have other commitments before 4pm in the week.

Some concerns were also raised by residents that live close to the Eastbourne site about potential negative impacts of opening for longer at weekends. There will be a chance for these concerns to be raised through the planning process if permissions are applied for to open the sites for longer.

Q10. Thinking about the times you would want to visit Crowborough or Eastbourne sites. What do you think about keeping these sites open later at the weekend and closing them at quieter times during the week?

Response	Number of Respondents	Percentage
Perfectly Acceptable	813	24%
Acceptable	961	28%
Neutral	550	16%
Unacceptable	128	4%
Totally Unacceptable	67	2%
Not applicable - I don't visit		
these sites	863	26%
Total Number of Respondents	3,382	100%



In relation to the specific proposals around these two sites, on balance, there is support with 52% of all respondents agreeing they are acceptable. Although 26% felt it was not applicable to them and 16% were neutral. Only 6% of all respondents indicated they do not generally find this acceptable. Looking just at those respondents who feel this question is applicable to them, just over 70% found the proposals widely acceptable.

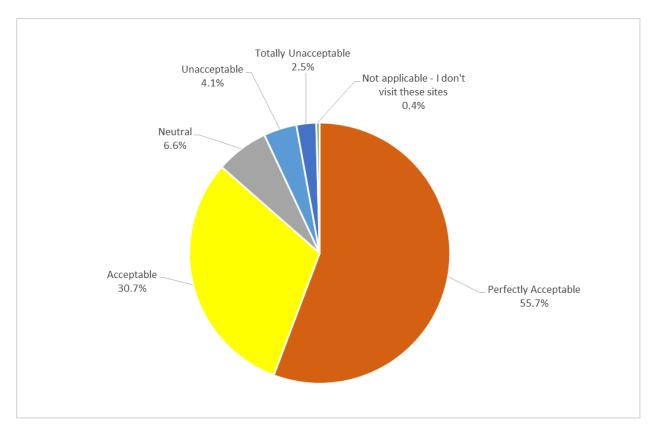
The views of local users of the Crowborough and Eastbourne sites are different to the views from all respondents above, as they would be directly affected whereas other respondents would generally not be.

Given that the proposal to keep the Crowborough site open later at the weekend and close it at quieter times during the week will most strongly affect the users of this site, the response to question 10 has also been filtered by those respondents that selected this site in answer to question 2 ('which site do you use most often?').

Q10. Thinking about the times you would want to visit Crowborough or Eastbourne sites. What do you think about keeping these sites open later at the weekend and closing them at quieter times during the week?

Analysis for respondents using Crowborough site most often

Response	Crowborough users	Percentage
Perfectly Acceptable	136	55.7%
Acceptable	75	30.7%
Neutral	16	6.6%
Unacceptable	10	4.1%
Totally Unacceptable	6	2.5%
Not applicable - I don't visit these		
sites	1	0.4%
Total Number of Respondents	244	100%



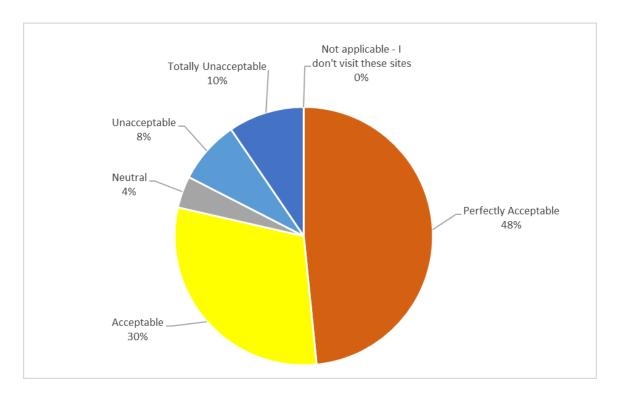
86% of Crowborough respondents find the proposal acceptable, with almost 7% finding it unacceptable.

Given that the proposal to keep the Eastbourne site open later at the weekend and close it at quieter times during the week will most strongly affect the users of this site, the response to question 10 has also been filtered by those respondents that selected this site in answer to question 2 ('which site do you use most often?').

Q10. Thinking about the times you would want to visit Crowborough or Eastbourne sites. What do you think about keeping these sites open later at the weekend and closing them at quieter times during the week?

Analysis for respondents using Eastbourne site most often

Response	Eastbourne Users	Percentage
Perfectly Acceptable	122	48%
Acceptable	76	30%
Neutral	10	4%
Unacceptable	20	8%
Totally Unacceptable	24	10%
Not applicable - I don't visit these		
sites	0	0%
Total Number of Respondents	252	100%



78% of Eastbourne respondents find the proposal acceptable, with 18% finding it unacceptable.

Again, the table below sets out the ten most commonly expressed views in relation to this proposal in order of frequency. The top issues listed are addressed below table P3 and in 'The Council's Response to Key Themes' section 4.

The comments in the table evidenced that a proportion of respondents linked their support of this proposal to a hope that its implementation would prevent closure of the Forest Row or Wadhurst sites.

Table P3 – Summary of principal comments submitted in relation to Proposal 3

Rank	Comment Theme	Quantity
	Suggestions for alternative site opening hours/days, some suggesting	
1	that these changes (too) could make savings	230
2	Agree with the Proposal	212
3	Disagree with reducing site opening hours	131
	The current or proposed opening times are inconvenient for those who	
4	work	84
	Agrees with some of the proposals as long as it means threatened sites	
5	remain open	49
6	There will be an increase in traffic/congestion	42
7	There is a concern there will be an increase in fly-tipping	40
8	This proposal doesn't affect me	31
	The remaining sites are too far away, it will take too long to travel, some	
9	have said longer than 20 minutes	29
	The timings of the skips being emptied, collected and swapped are	
10	inconvenient, some suggestions that this is the cause for low usage	25

Significant numbers of comments relating to proposal 3 were in support (261), with some also voicing disagreement, particularly people whose work commitments mean their ability to access sites could be restricted.

Comments in response to this proposal included support for weekend opening, but some said this shouldn't be at the expense of reducing weekday opening hours, and some suggested opening into the evenings. Many people made specific suggestions as to alternative opening patterns for some of the sites.

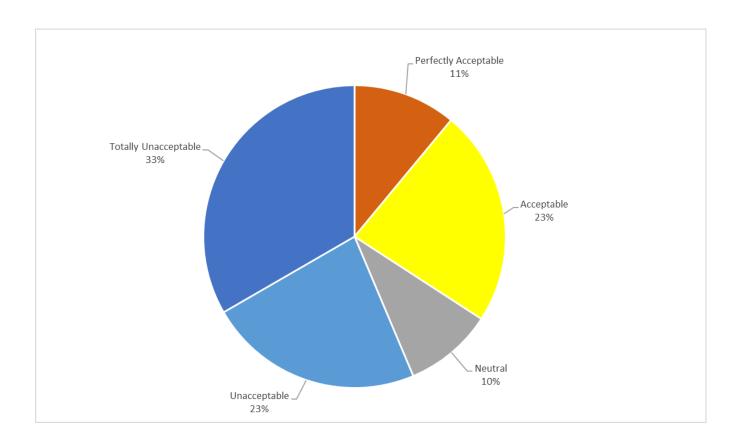
A range of more general comments were made and there were also a number of themes identified comprised of comments raised by relatively low numbers of people, between one and 22 respondents. In total, 877 people made comments.

In terms of the current or proposed opening times being inconvenient for those who work, it is proposed to ensure that the recycling sites are open during peak times of use in the week, and that where possible, they are also open all day at weekends. We consider that this will allow reasonable access to the sites for the vast majority of people.

Supplementary question – charging to enter sites: The principle of a small charge to enter the recycling sites

Q12. In principle, would you be prepared to pay a small fee to enter the Household Waste Recycling Sites (for example, £1 per visit)?

Response	Number of Respondents	Percentage
Perfectly Acceptable	373	11%
Acceptable	783	23%
Neutral	321	10%
Unacceptable	779	23%
Totally Unacceptable	1,128	33%
Total Number of Respondents	3,384	100%



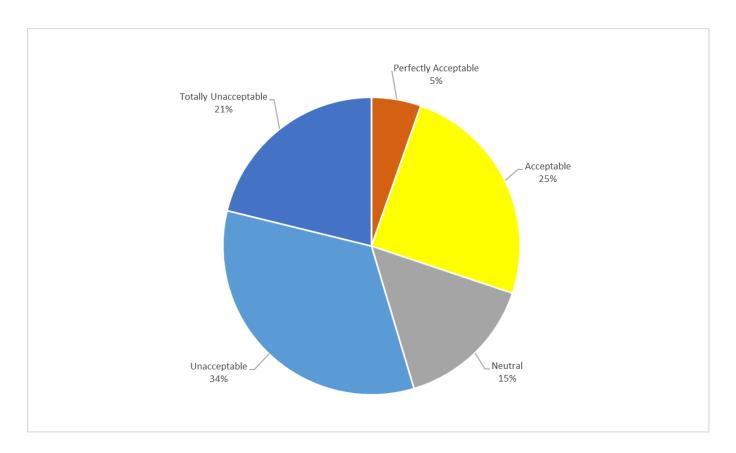
A majority here (56%) found this an unacceptable proposal, versus 34% responding positively and 10% neutral. There is much less support for a blanket charge to enter a HWRS than for proposal 1, where charges would apply to certain types of waste.

Your opinion of the recycling site service proposals

The final short section of questions regarding the services asks for overall views of the Council's proposals, a ranking of the proposals from most to least acceptable, and additional suggestions or comments that respondents may have wanted to contribute to the consultation.

Q13. Thinking about what we've told you about our proposals so far, how do you feel about the proposals overall as a way to make savings?

_	Number of	_
Response	Respondents	Percentage
Perfectly Acceptable	181	5%
Acceptable	836	25%
Neutral	513	15%
Unacceptable	1,132	34%
Totally Unacceptable	717	21%
Total Number of Respondents	3,379	100%



Overall, 30% of respondents thought that the four proposals outlined in the questionnaire were either a perfectly acceptable or acceptable way to make the required savings to Household Waste Recycling Sites. 55% of respondents thought the proposals were unacceptable.

Q14. Your preferred options: please rank the choices from 1 to 4 in order of acceptability, 1 being the choice you find most acceptable and 4 the one you find least acceptable. In this question, respondents were asked to rank the four options to indicate which they found to be most acceptable (1) to least acceptable (4). The same number could not be selected twice in the ranking exercise.

		Rank	Ranking given - number of respondents				
	Option	1	2	3	4	Average Score	Rank
1	Charges for certain types of waste	1,276	797	782	488	2.14	2
2	Closures, Forest Row & Wadhurst sites	518	675	510	1,640	2.98	3
3	Changes to opening hours	1,248	1,282	726	87	1.90	1
4	Introduction of an entry charge	301	589	1,325	1,128	2.98	4

The adjustment to opening hours is seen as the most acceptable of the options. The least acceptable is extremely close, between the proposal to charge for entry and to close the part-time Forest Row and Wadhurst sites, with no distinction between these at 2 decimal places in the scores.

It should be noted that many residents have strong feelings about more than one, and potentially all of the options. The purpose of this question was not for respondents to pick a favourite, but to rank them based on how acceptable they find them. The result of this question was that changes to opening times was the most acceptable proposal, followed by charging for non-household waste, then site closures and lastly the introduction of an entry charge. However, this result should not be taken in isolation; it should be considered along with the previous responses to the individual proposals in terms of their acceptability

A relatively small number of respondents (56) either expressed clear dissatisfaction with the requirement to rank these options in their comments in response to Q15 or by email, or made it evident that they did not properly understand the requirement to do so. As a response to this question was required, the questionnaire (when completed online) could not be submitted without a ranking being completed.

Where the respondent specified that we should not include their answer, or where we could not interpret a ranking for a respondent because (on a paper questionnaire) they had ranked more than one option at the same level, the answers to Q14 have not been used.

Finally in question 15, respondents were asked if they wanted to put forward suggestions for other ways in which the Council could make savings at recycling sites. In total 1,296 (38% of all respondents) expressed views here, although a number of comments were re-statements of concerns regarding the proposals rather than additional suggestions. The ten most commonly raised *suggestions* are summarised in the table below, in order of frequency.

Table P4 – Summary of principal comments submitted in relation to question 15 – suggestions for other ways to make savings

Rank	Comment Theme	Quantity
1	Sell items brought to the sites to raise revenue	184
	Suggestions for alternative site opening hours/days, some suggesting	
2	that these changes (too) could make savings	121
3	Suggests other charges/only charge for some items/charges too high	82
	Some of the sites appear to have more staff than needed / suggest	
4	cutting down on staffing	71
5	You should be finding ways to increase recycling/reduce waste	70
	Most of the non-household waste items are disposed at sites by trade	
6	users/charge business users a fee to use the sites/recycle items	66
	The shops at the sites should be expanded/improved, some suggestions	
7	to sell additional types of items at them	65
8	You should try to make savings on your waste management contracts	61
	Use money generated/make savings from other areas of the council to	
9	keep sites open	49
10	Materials brought to the sites should be reused e.g. soil for composting	41

Given the opportunity to tell us about their ideas for other ways of making savings, respondents' main suggestion to achieve savings was to sell items brought to the sites in order to increase revenue. However as explained in the FAQs we published on our website at the start of the consultation, under our contract agreement, the money from recycling and re-use shop sales goes to our contractor to help cover the cost of running the sites.

Respondents also suggested that savings could be made by operating alternative opening hours or days. Reducing hours and days results in limited operational savings compared to the full saving that can be achieved from closing a site. This means we cannot rely upon this alone to achieve the savings we need. The proposal to reduce opening hours during quieter times in the week needs to sit alongside other savings proposals, such as site closures. Based on current information, some HWRSs are more importantly strategically as they contain a waste transfer station and/or deal with a large volume of waste and their location serves a high number of residents or large area (Pebsham, Eastbourne, Newhaven, Maresfield, Heathfield and Crowborough). Seaford is already part time. Hailsham is a small but very busy site and there are concerns that reducing hours at this site would cause significant difficulties to the management of the site. It would be possible to shorten opening hours at Lewes and Mountfield HWRSs without significantly impacting operations or service levels. The consultation did not ask how residents felt about full day closures, but some residents did suggest that this might be a way of securing further savings and through discussion with our contractor Veolia, this has been raised as an alternative to shorter opening days as it may deliver further operational and financial efficiencies.

Comments were made about the level of charges proposed for non-household waste and the types of waste being charged for. In order to achieve the required savings, we would need to include the majority of materials proposed, and certainly rubble and soil which accounts for most of the tonnage and cost. The charges proposed have been calculated in order to cover the costs of the scheme and of disposal of the waste, and not to generate a profit for East Sussex. Respondents made some suggestions to charge for site entry, however this Government does not currently allow the Council to charge an entry fee to recycling sites, and it is not something we would be able to introduce at present.

It was also suggested that we could cut down on staffing at the sites, however it is not possible within our contract to reduce staff at sites or use volunteers at the sites whilst maintaining the required level of site safety and efficiency required from our contractor.

People also said we should be finding ways to increase recycling and reuse and reduce waste through for example:

- Educating the public on reducing consumption and waste.
- Encouraging people to recycle or donate usable items to charity shops instead of throwing them away.
- Encouraging people to do more home recycling and composting.

We will continue to support the waste collection authorities by promoting recycling though social media, our website and articles. We also promote home composting through our website, as well as reuse charities, letting people know they can reduce waste such as furniture and reusable items in good condition by making use of these organisations.

There were also a number of other themes comprised of comments raised by between one and 40 people.

4. County Council's response to key themes

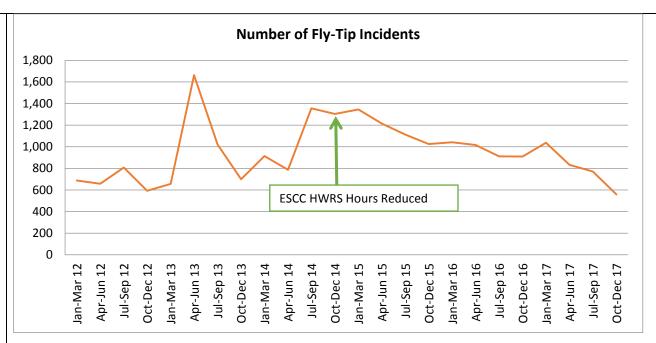
All of the responses, feedback and suggestions received during the consultation have been read and considered and have informed the final proposals that will be considered by Cabinet members in June 2018.

The overall top ten themes emerging from all comments received, listed in descending order of the frequency in which they arise, are as follows:

Rank	Comment Theme	Quantity
1	1 There is a concern there will be an increase in fly-tipping	
	Positive comments regarding a particular site (including how busy it is),	
2	7	532
	There is a concern there will be a negative impact on the	
3	environment/recycling as a whole	527
	Suggestions for alternative site opening hours/days, some suggesting that	
4	these changes (too) could make savings	450
	The remaining sites are too far away, it will take too long to travel, some	
5	have said longer than 20 minutes	395
6	Suggests other charges/only charge for some items/charges too high	386
	The effects of the proposals will cost the council more than they will save	
	(e.g. the cost of clearing up fly-tipping or the cost of staff to	
7	collect/administer the charges)	281
8	There will be an increase in traffic/congestion	236
9	Sell items brought to the sites to raise revenue	202
10	Disagree with reducing site opening hours	144

In this section, we provide the County Council's response to the overall top ten themes that have emerged from the survey comments received. This includes the comments received through the consultation in response to each of the proposals.

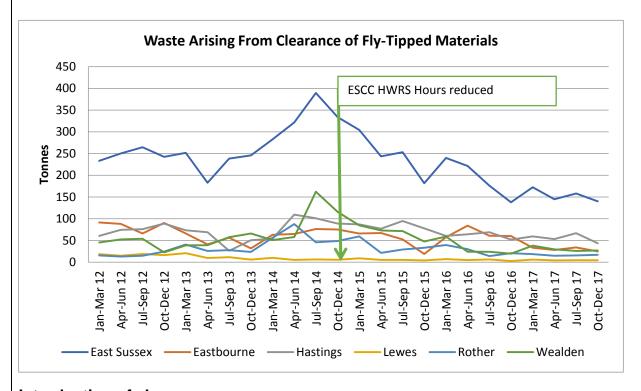
Rank	Comment Theme		
1	There is a concern there will be an increase in fly-tipping		
	Site Closures:		
	Should the two proposed sites close, alternative accessible options for disposing of waste should discourage fly-tipping. These include home composting, kerbside recycling and refuse collection services, bulky waste collections and local neighbourhood recycling banks, as well as travelling to the nearest alternative waste site. We appreciate that drive time to an alternative would increase for residents of Forest Row and Wadhurst and some of the surrounding settlements. However, our modelling shows that 98.2% of the population of East Sussex would still be able to access a Household Waste and Recycling site (HWRS) within a 20 minute drive.		
	Local experience shows that residents are not likely to resort to fly-tipping if they cannot use a recycling site for any reason. Since opening hours at Forest Row, Seaford and Wadhurst were cut in October 2014, the number of fly-tips recorded by the local authorities in East Sussex has declined. There has also been a decreasing trend in the amount of fly-tipped waste reported.		
	The graph below shows the number of fly-tipping incidents* reported by the local authorities to Defra (via Waste Data Flow, or WDF) in East Sussex, on a quarterly basis, for the last six years.		



*NB not all fly-tips on private land may be reported to the local authorities.

Lewes and Wealden District Councils' fly-tipped waste reported last year (2017/18) had reduced by 47% of the 2012/13 tonnage - prior to the changes in opening hours.

Defra data reported to WDF for East Sussex since October 2014 also shows that there has been a decreasing trend in the number of fly-tipping incidents reported (see above graph) and the quantities delivered to ESCC facilities (see below graph). For further detail see the full HWRS Service Review, Appendix 6 to the Cabinet report.



Introduction of charges:

Evidence shows that many councils who've introduced charges for certain waste types have seen no directly proportional increase in fly-tipping as a result, or just a slight increase in line with national trends.

In a NAWDO (National Association of Waste Disposal Officers) survey of local authorities in June 2017 carried out by the Waste Resources Action Programme, of those respondents which had introduced HWRS charges for non-household waste, regarding the impact on fly-tipping:

- 12 authorities said they have seen no impact, or a minimal one.
- 4 authorities said they have seen an increase, but only in line with national trends.

Nearby authorities in the South East who have introduced charges for non-household waste, such as Surrey and Hampshire County Councils have not seen evidence of an increase in fly-tipping tonnages as a result. This indicates that residents are not likely to resort to fly-tipping if they must pay for materials that used to be free or if access to their local HWRS changes.

Monitoring impacts:

Fly-tipping is a criminal offence punishable by a fine of up to £50,000 or 12 months imprisonment if convicted in a Magistrates' Court. The offence can attract an unlimited fine and up to 5 years imprisonment if convicted in a Crown Court. It is considered that the severity of the custodial sentences and fines is an appropriate deterrent to deter most people from committing what is a significant criminal offence.

If the Cabinet decides to make changes to the sites, we'll continue to closely monitor local fly-tip data as well as the sites, to check for signs of an impact. We will take appropriate action with all relevant partner authorities and agencies to ensure implementation of proposals does not have a negative impact on the environment.

Positive comments regarding a particular site (including how busy it is), there will be a negative impact on the community if proposals go ahead

Most of these concerns were in relation to the closure of Forest Row and Wadhurst which were felt to be busy sites that help residents achieve their recycling goals. We recognise that both sites, and the reuse shops are highly valued by residents in both areas and that these residents would be most affected if the sites were to close.

The network of 12 sites in East Sussex is well-used by residents. The sites receive 1.6 million visits per year and handle about a quarter of the total waste that East Sussex residents produce. One purpose of our HWRS review was to identify which sites were of the greatest strategic importance to the county. Through a wide range of metrics including waste tonnage data, visitor statistics, resident satisfaction, recycling rates and contractor performance monitoring, we have ascertained where the sites are being well-used and running efficiently, and where there is some capacity in the network. Forest Row and Wadhurst currently open three days per week and are the least busy sites in the network in terms of visitor numbers and tonnages collected.

Tonnage:

Both Forest Row and Wadhurst are comparably more expensive to operate based on the lower tonnage throughput. If both part time sites were to close, 5% of the quantity of materials by weight collected by the network of HWRSs would be displaced into the surrounding sites and kerbside collections. The Forest Row site handles less than 2% and Wadhurst less than 3% of the total HWRS tonnage, whereas the Maresfield site, located in a village with a similar population density, handles approximately 8% of the total.

Forest Row has the lowest kilogram per site-user visit at 31kg per visit. The highest is Hailsham at 52kg per visit. The average across the network being 39kg per visit.

Site Demand:

Low demand can also be evidenced via site hourly usage during open hours. Forest Row and Wadhurst both average 31 resident visits per hour open (the lowest across the network), whilst Maresfield is handling an average of 49 resident visits an hour and this is over a seven day a week, rather than three day a week, opening pattern.

Need to make savings:

The funding that we receive from the Government continues to reduce even though the demand for our services is rising, for example from the growing population of elderly people in the county.

The Council has already made savings of around £112 million this decade, and due to the continuing cuts in council funding we are expecting to need to save an additional £47 million by 2021 of which £17 million will need to be cut from the 2018/19 budget. At the same time we need to protect services for the most vulnerable.

It is getting more difficult to find ways to make savings. Tough decisions will have to be made by the Council's elected Members, and we're likely to see some reductions in services.

It costs £2.5 million a year to maintain and manage our 12 sites and another £7.5 million to recycle and dispose of all the waste residents bring. At the Full Council meeting on 6 February 2018, the Council's annual budget was considered and it was decided to reduce the annual waste and recycling budget by £720,000 to help make the savings the Council needs overall of which savings of £558,000 will need to be made in 2018/19. In future, even more savings may be needed.

If the recommendation to close both sites is agreed, it is recommended that officers continue to work with both Parish Councils and any other interested parties in order to ascertain whether a community-run site could be set up to retain appropriate elements of the service which would be run for local residents.

In the meantime, we consider that the proposed network of 10 remaining sites would provide residents with a reasonably accessible Household Waste Recycling Site service.

There is a concern there will be a negative impact on the environment/recycling as a whole

Recycling:

We want to keep waste to a minimum and get as much useful material as possible out of the dustbin, and reused or recycled. In 2016/17, East Sussex residents together with the borough and district councils and the County Council recycled, reused or recovered energy from 95% of our household waste and only 5% went to landfill. This makes us one of the highest performing authorities in the country for minimising waste to landfill. East Sussex residents reused, recycled or composted 44% of household waste, in line with the national recycling average.

We don't expect a decrease in recycling as a result of the proposals. We think East Sussex residents will still have reasonable access to the Household Waste Recycling Sites, and the borough and district councils offer a comprehensive kerbside recycling collection. Information on recycling collections can be found on our <u>rubbish and recycling</u> <u>website page</u>: www.eastsussex.gov.uk/recyclemore/. We would encourage people to think about reducing and reusing waste as well as recycling. Should the proposals be implemented, we will continue to monitor recycling levels in East Sussex and assess whether mitigation measures, such as publicity campaigns, would be necessary.

Environment:

To reduce the possibility of an increase in traffic and pollution from some people having to travel further to a different recycling site, we encourage residents to save their waste up where possible to minimise trips to the recycling sites. Residents could also think about combining journeys to the sites with another in the same direction to save time, fuel and emissions, although we appreciate this is not always possible.

All the borough and district councils in East Sussex offer residents a kerbside collection of green waste from residents' homes as well as bulky waste collections which saves individual journeys to transport waste to recycling sites and helps the environment. We appreciate there is a cost to these services, however they also save residents petrol and time. Furniture in good useable condition can also be collected from homes through charitable collections. See information on local collection schemes on our <u>furniture re-use</u> and recycling website page: www.eastsussex.gov.uk/furniture/

Respondents raised concerns about the impact of closures on the Ashdown Forest. The Forest Row HWRS is within close proximity to the Ashdown Forest, and is a designated site, important for conservation and wildlife. A Habitats Regulations Assessment was undertaken in 2018 and independently reviewed and made the conclusion that there would not be a likely significant effect on the Ashdown Forest protected site as a result of the HWRS closure proposals.

Even if some trips across the protected site are extended, it is considered that alternative routing of Forest Row HWRS-user traffic is unlikely to increase overall traffic across (and within 200m of) the protected site. So the recycling site closure proposal would not adversely affect the ecological integrity of Ashdown Forest.

4 Suggestions for alternative site opening hours/days, some suggesting that these changes (too) could make savings

We may be able to reduce our costs if we closed the sites during quieter times and we are investigating this possibility with our contractor, Veolia. Previous experience has shown that limited savings can be achieved by reducing opening days. Unfortunately the savings are not proportional due to the fixed nature of many of the costs, and additional costs of servicing and security on the days when sites are closed.

The majority of costs associated with running a HWRS are fixed in nature, including aspects such as maintenance, IT equipment, personal protective equipment, site license fees and non-domestic rates. Reducing opening hours and/or days, proportionally reduces limited operational costs (such as staffing and utilities), but these can constitute a small fraction of the overall costs depending on the type of change to service.

Therefore reducing hours and days can result in limited operational savings compared to the full saving that can be achieved from closing a site and we cannot rely upon this alone to achieve the savings we need. So the proposal to reduce opening hours during quieter times sits alongside the proposal to close the sites at Forest Row and Wadhurst.

Based on current information, some HWRSs are more importantly strategically as they contain a waste transfer station and/or deal with a large volume of waste and their location serves a high number of residents or large area (Pebsham, Eastbourne, Newhaven, Maresfield, Heathfield and Crowborough). Seaford is already part time. Hailsham is a small but very busy site and there are concerns that reducing hours at this site would cause significant difficulties to the management of the site. It would be possible to shorten opening hours at Lewes and Mountfield HWRSs without significantly impacting operations or service levels. The consultation did not ask how residents felt about full day closures, but some residents did suggest that this might be a way of securing further

savings and through discussion with our contractor Veolia, this has been raised as an alternative to shorter opening days as it may deliver further operational and financial efficiencies.

The remaining sites are too far away, it will take too long to travel, some have said 5 longer than 20 minutes

We consider that if the proposed sites were to close, residents will still be provided with reasonable access to the service.

Our latest review found that East Sussex currently offers an above average service in terms of the number of sites, and the number of residents per site and households per site, compared with other English councils with similar population sizes and geographical areas. The data shows that Wealden District, particularly in the North, currently offers a lower number of residents per site than the rest of the county.

WRAP¹ recognise that there is no nationally-recognised steer on the acceptable level of HWRS provision and continue to cite the National Assessment of Civic Amenity Sites (NACAS)² recommendations for minimum levels of HWRC provision.

The NACAS recommendations are based on journey times, catchment areas, waste tonnage at sites and households/population per HWRS. For journey times, the recommendation is 'maximum driving times to a site for the great majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas'.

If Forest Row and Wadhurst Household Waste Recycling sites were to close, we have calculated that less than 740 people from these areas would no longer be able to access a household waste site within a 20 minute drive time. We have a higher concentration of household waste recycling sites in the North of the county and we are currently offering a better than average service compared to the rest of England. See section 3 'Current Level of Service and Needs Analysis' of the full HWRS Service Review in Appendix 6 for more detail.

We appreciate that should the two proposed sites close, drive time to an alternative would increase for residents of Forest Row and Wadhurst and some of the surrounding settlements. Modelling for the accessibility study within the HWRS Review Report shows East Sussex residents' access to an HWRS within a 20 minute drive is currently 98.4% of the population. Closing the proposed sites would still provide access to a site within a 20 minute drive for 98.2% of the population of East Sussex.

The journey time calculations were carried out using a software package called Visography TRACC. Other organisations that use this software include the Department for Transport and the NHS. TRACC uses highways data to create journey times from origins to destinations. Highways information from an underlying road network connects the origins and destinations. A number of constraints are built in, such as travel distance and stop limitations. The software then uses the Dijkstra shortest path algorithm to route between these points. The data has been calculated using the most up-to-date available road network which is April 2016. By using this established software package, we can be confident that the Accessibility Study is a suitable and robust basis upon which to determine reasonable journey times for travel to Household Waste Recycling Sites.

We recognise that some residents who currently use Forest Row and Wadhurst would be inconvenienced by changes. Affected residents would be able to access other local

The Waste & Resources Action Programme (WRAP) works with businesses, individuals and communities to achieve a circular economy through helping them reduce waste, develop sustainable products and use resources in an efficient way ² The 2004 National Assessment of Civic Amenity Sites, NACAS, was the largest research project to have been carried out into Civic Amenity (CA) sites in the UK and is still considered relevant for benchmarking purposes

HWRSs in addition to the normal kerbside collection services for waste, for bulky items, and for recycling and garden waste.

6 Suggests other charges/only charge for some items/charges too high

Waste Disposal authorities have a statutory duty to provide reasonably accessible Household Waste sites for the free disposal of 'household' waste. However, our sites still accept significant volumes of waste from residents classified as 'non-household' waste.

Bonded asbestos, hardcore, plasterboard, soil and tyres are not classed as 'household' waste, even if produced by residents. As such, under the Controlled Waste Regulations 2012, local authorities are not obligated to accept them for free at the HWRSs. We are only proposing charging for this 'non-household' waste; councils are not legally able to charge for 'household' waste disposal.

We looked at other local authorities' approaches to chargeable waste to see how they set up their schemes. We have decided on a much narrower range of proposed chargeable waste types than some other councils.

Our standard bag size was an average taken from across a selection of other authorities – some use a larger bag, others smaller. We have decided on a bag size which we believe to be a reasonable average and readily available in shops.

The proposed charges include the cost of setting up and operating a chargeable waste system, in addition to the costs of disposal of the waste through our contract with Veolia. We have also carried out, in conjunction with our Trading Standards colleagues, an exercise of test weighing bags to ascertain what would be an average weight. From there, we have calculated what a 'standard bag' will cost.

We have looked at prices that have been set by other authorities, and used feedback from our Trading Standards team to propose a fair price that covers the cost of disposal and scheme administrative costs, not to create income in the form of profit.

A £4 per bag charge for plasterboard, soil and hardcore doesn't quite cover the overall cost to us of disposal of a 'standard bag', but we think this would be a reasonable amount to charge residents and in line with charges made by nearby authorities.

7 The effects of the proposals will cost the council more than they will save (e.g. the cost of clearing up fly-tipping or the cost of staff to collect/administer the charges)

There is no clear evidence that there is a link between changes to Household Waste Recycling Site policies and an increase in fly-tipping (see theme number 1 above). As such, we do not expect fly-tipping incidents or tonnages to increase significantly and cost much more in terms of the cost of clearing or disposing of fly-tipped waste. To give context, the table below shows the amount of fly-tipping and HWRS waste we dealt with in 2017/18 and how much it cost to dispose of it.

Waste type	Tonnage	Percentage of total waste	Disposal cost
Fly-tipping	554	0.22%	£80,280
Non-household waste at HWRSs	9,644	4%	£1.09m
Total waste at HWRSs (including non-household)	63,796	25%	£7.5m

We are aiming to save the required £720,000 from the annual Waste and Recycling budget. Fly-tipping disposal costs would have to increase by over 800% in order to outstrip the savings we expect from our proposals. Fly-tipping also incurs collection costs covered by the Districts and Borough councils or land owners, so if service changes are introduced, it will be important to closely monitor local fly-tip data to check for signs of an impact and take appropriate action with partners if necessary.

8 There will be an increase in traffic/congestion

Other nearby sites including Crowborough, Heathfield, Maresfield and Mountfield, will be able to receive the additional visitors and waste from the Forest Row and Wadhurst recycling sites.

Should the two sites close, we will work with our contractor to monitor whether congestion is arising at the alternative sites and if any mitigation is needed.

As the Forest Row HWRS is within close proximity to the Ashdown Forest, a designated site important for conservation and wildlife, we have looked at whether vehicle trips across the Forest protected site are likely to increase as a result of closure if residents take their waste to an alternative recycling site.

It is considered that alternative routing of Forest Row HWRS-user traffic is unlikely to increase overall traffic across, or in the close vicinity of, the protected site. So the potential closure of the HWRS will not adversely affect the ecological integrity of Ashdown Forest.

Also see 'Environment' above, theme number 3.

9 Sell items brought to the sites to raise revenue

ESCC doesn't make any money from sales of recycling or items for reuse at the HWRSs. It costs £2.5m to pay for the upgrades to and the management of our 12 HWRSs and £7.5m to recycle and dispose of the waste that our residents bring to them. Under our waste management contract agreement, the money from recycling and re-use shop sales goes to our contractor, so the contract cost takes into account that the contractor can generate some income in this way.

10 Disagree with reducing site opening hours

Comments about site opening hours included concerns that the extension of site opening hours at the weekend should not be at the expense of weekday opening hours, and concerns were also raised by those whose work commitments mean their ability to access sites could be restricted by the proposed changes in opening hours. The service could become less accessible for the proportion of the population who work at weekends and/or have other commitments before 4pm in the week. Of the different age groups responding, those aged over 65 were less likely to find the proposal unacceptable, compared to those of working age.

We would expect retired people to be less likely to be impacted by the changes to opening hours as they may have the flexibility to travel at different times of the day. Those of working age could be somewhat disadvantaged by the proposal to reduce opening hours slightly at either end of the day.

Nevertheless, the impact on residents is expected to be minimal as we have proposed reducing site opening hours outside periods of peak demand, with the sites continuing to be open when there is most demand, including both weekday and weekend opening hours. For those that find the changes to opening hours inconvenient, the impact may be that they use a site less often, and rely on other ways to dispose of their waste, such as kerbside and bulky waste collections.

We will clearly advertise any changes to opening times to ensure that residents are informed. This will be done through marketing at sites as well as on the County Council's website.

Unfortunately due to the continuing cuts in central Government funding, caps placed on increasing council tax, and the rise in demand for Council services, for example from the growing population of elderly people in the county, our budget can no-longer cover the current cost of waste disposal.

We cannot afford to keep all the sites open for the hours that everyone would prefer during the week, as well as addressing the significant demand (evidenced by use at the other sites) for weekend use.

We need to be selective and responsive to where there is most customer demand.

Also see theme numbers 2 and 4 above.

5. Consultation Submissions from Key Stakeholders

5.1 Local Authorities and Waste Partnerships

5.1.1 Wealden District Council

Both HWRS sites proposed for closure are situated in Wealden district, and Wealden District Council (WDC) who replied to the consultation via Councillor Roy Galley. WDC's primary concern was around the proposed closure of the two HWRS sites within their district and highlighted the importance of these facilities to local residents. In particular, WDC referenced concerns over possible fly-tipping and also the impact upon the Ashdown Forest from increased vehicle trips and asked if a dedicated Habitats Regulations Assessment would be undertaken. Appendix 3 to the Cabinet report provides details of how East Sussex County Council has addressed this.

- 5.1.2 WDC asked if consideration had been given to alternative models of operation for these sites i.e. a community or voluntary body, parish council or private business. East Sussex County Council has been engaging with the respective Parish Councils regarding this and Appendix 5 to the Cabinet report 'Alternative Models of HWRS Operation', provides more details on possible options that the Parish Councils may choose to consider.
- 5.1.3 WDC asked about the possibility of accepting trade waste at Waste Transfer Stations as referenced in the HWRS Service Review document (Appendix 6 to the Cabinet report). There looked to be an opportunity to explore this further with Veolia following publication of the HWRS Review. Subsequent work with Veolia suggests that due to existing market provision for this type of waste, a new service provided at our sites may not be as competitive as the services provided by other local waste management companies.
- 5.1.4 The proposed site improvements at Hailsham and altering of some opening hours to better meet demand are welcomed in WDC's response.

5.1.4 East Sussex Joint Waste Collection Partnership

The representation made by the East Sussex Joint Waste Collection Partnership was broadly supportive of the proposals made within the consultation and recognised the budgetary pressure the Authority faces. The Partnership referenced a risk of possible fly-tipping if Forest Row and Wadhurst HWRSs closed. They are keen to work with East

Sussex County Council to develop joint preventative measures. The Partnership supports improvements to Hailsham HWRS and the realigning of HWRS opening hours to ensure that they fit the needs of users. Regarding the proposal to charge for non-household waste, the Partnership supports this although they caution that they will monitor these waste streams to understand if these are being diverted into household waste kerbside collections.

5.1.5 West Sussex County Council (WSCC)

As a neighbouring Waste Disposal Authority, West Sussex County Council's response highlighted how changes to the ESCC HWRS service may impact their own service. They expressed concerns that increased numbers of ESCC residents may use WSCC sites and described the operational and financial impacts.

WSCC also described potential restrictions they may introduce on vans and trailers in the future at their own sites.

WSCC highlighted that, after withdrawing charges for non-household waste in 2017, they do not have any current plans to reintroduce charging. In addition, WSCC highlighted the current prohibition on charging for entry that forms part of our consultation, albeit as an information gathering exercise only.

5.2 Members of Parliament

- 5.2.1 A total of two responses were received directly from MPs during the consultation period. Nusrat Ghani MP cited environmental concerns and thought that the closure of the HWRS sites at Wadhurst and Forest Row could affect recycling. East Sussex County Council was asked to consider all possible options before any decision around site closures is taken.
- 5.2.2 Stephen Lloyd MP responded on behalf of a constituent who was specifically concerned about traffic implications of the Eastbourne HWRS opening for longer at weekends. The resident believes that there will be a number of detrimental traffic-related outcomes such as congestion and increased noise pollution.
- 5.2.3 Before the start of the consultation, Sir Nicholas Soames MP asked for further information around the consultation after a West Sussex resident had contacted him regarding his use of Forest Row HWRS.

5.3 Parish Councils

A total of 12 Parish Councils submitted representations:

5.3.1 Forest Row Parish Council

The Parish Council believes that the proposals to close the Forest Row site are 'counterproductive', 'disproportionate' (in terms of the saving realised from the closure of Forest Row HWRS) and also 'premature' in that any possible closures should be deferred until there is updated government guidance on councils ability to charge for waste disposal at HWRSs. Concerns include fly-tipping and increased traffic movements across the Forest.

5.3.2 East Sussex County Council has been working with Forest Row Parish Council to explore possible options for the Forest Row HWRS to be operated by the Parish Council using an alternative model, should Members decide to close the site. These discussions include

- assessing legally possible options including models such as the site operation by the Parish Council itself or a Community Interest Company.
- 5.3.3 Waste Officers met with Forest Row Parish Council on 11 April 2018 to discuss options and have maintained a dialogue since then. The County Council has also subsequently supplied the Parish Council with advice to further inform their options. Appendix 5, 'Alternative Models of HWRS Operation' provides more background to these options. As part of their response to the consultation, Forest Row Parish Council delivered two petitions to County Hall (via Cllr Whetstone) in February before the consultation period began. A paper petition with 1,594 signatures, and an e-petition with 2,365 signatures were presented, both against the closure of the Forest Row site.

5.3.4 Wadhurst Parish Council

Waste Officers met with Wadhurst Parish Council on the 28 March 2018 to discuss the consultation proposals. Wadhurst Parish Council also delivered a petition to County Hall (via Cllr Standley) against the closure of the Wadhurst site, with 2,684 signatures.

- 5.3.5 **Frant Parish Council's** response was focused on the proposed closure of the two HWRS sites that they suggest will lead to increased car journeys across the Ashdown Forest and could increase fly-tipping. A petition was also submitted by the Parish Council, against the closure of the Wadhurst site, with 151 signatures.
- 5.3.6 **Withyham Parish Council** believes that their residents will be 'substantially affected' by the consultation proposals which they suggest will lead to an increase in fly-tipping, increased traffic across Ashdown Forest, queuing at neighbouring recycling sites, less being recycled and more waste being sent to landfill.
- 5.3.7 **Catsfield Parish Council** have concerns that the savings target will impact upon the current HWRS service and also any further schemes for waste management.
- 5.3.8 **Chalvington with Ripe Parish Council** have concerns over increased fly-tipping as a result of charging for non-household waste and suggest that their residents object to paying extra for something which they already pay council tax for.
- 5.3.9 **Hartfield Parish Council's** response focused on concerns about possible extra journeys across the Ashdown Forest if the Forest Row HWRS site is closed, and additional flytipping. They also told us that their residents will be more inconvenienced and spend more time and money travelling to a HWRS site further away.
- 5.3.10 **Piddinghoe Parish Council** cited their concern as increased fly-tipping from the introduction of charges for non-household waste that would then need to be cleared by District & Borough Councils.
- 5.3.11 **Berwick Parish Council** said that they think charging for non-household waste will lead to an increase in fly-tipping.
- 5.3.12 **Arlington Parish Council's** response focused on a concern around increased fly-tipping as a result of charging for non-household waste.
- 5.3.13 **Isfield Parish Council** also said that they think charging for non-household waste will lead to an increase in fly-tipping.

- 5.3.14 **Horam Parish Council** invited an Officer to its AGM (18/5/18) to talk about the waste service and the consultation, which was attended by the Waste Team Manager.
- 5.3.15 **Ditchling Parish Council** replied to the consultation via the Consultation Hub but contacted the waste team to suggest that the ranking question in the online survey was difficult to use and understand.

5.4 Other Organisations

5.4.1 National Farmers Union (NFU)

The NFU's representation was primarily concerned with fly-tipping on private land and the possible impact upon the 450 East Sussex Farming & Growing businesses that it represents. The NFU believes that changes in HWRS provision could lead to changes in residents' behaviour, which will ultimately lead to increased fly-tipping. The NFU also suggested that the range of materials proposed to be charged for are typical of the sort of waste their members see fly-tipped in the countryside. In addition, the NFU believes that there is a lack of enforcement and prosecution within the County which should be addressed.

5.4.2 East Sussex Fire & Rescue Service (ESFRS)

In their response to the consultation, ESFRS highlighted the number of high profile and protracted fires across East Sussex involving waste recycling, landfill and waste wood sites. ESFRS highlighted the 32 fires since 2012 that they have attended at these types of sites. ESFRS did not comment on the specific proposals within the consultation but took the opportunity to raise the possible wider impact of changes around waste services provision. Through engagement and partnership, they wish to ensure that these changes would not result in an increased number of incidents in the community.

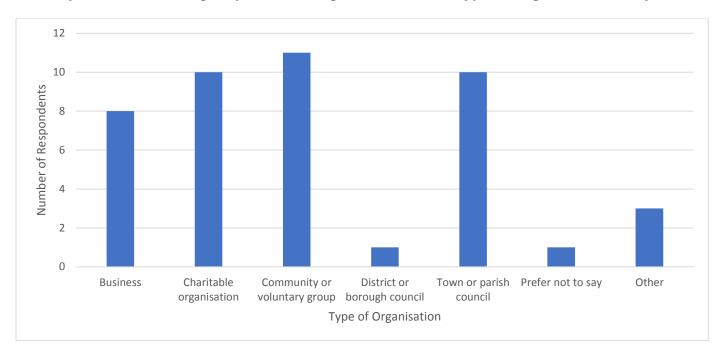
6. About You - Classification of Respondents

These questions provide demographic and other personal information to assist in analysis and interpretation of the results, and in particular to inform the Equalities Impact Assessment.

Q16. Are you responding as a resident or as part of an organisation?

	Number of	
Response	Respondents	Percentage
Resident	3,319	98%
Organisation	44	1%
Prefer not to say	21	1%
Total Number of Respondents	3,384	100%

Q17. If you are answering as part of an organisation, what type of organisation are you?

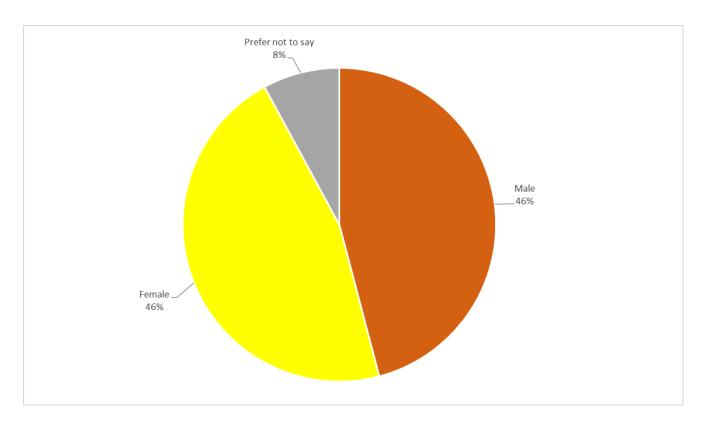


The range of organisations represented is fairly broad, but numbers overall are small at 44 and there is no statistical significance in the distribution. Some additional responses were received from Parish and District Councils separately from the survey, and these are summarised in section 5 above, as well as records of verbatim comments being available in the Cabinet Members' room.

The consultation included twelve equalities questions, (questions 18 to 29). This information is collected to ensure that everyone is treated fairly and equally and to help us to meet our duties under the Equality Act 2010. Asking these questions helps ensure that we are giving everyone an opportunity to influence the decisions we make and that we are making our services accessible to everyone. This section of the questionnaire has informed the final Equalities Impact Assessment, included as Appendix 2 to the Cabinet report. A summary of the responses to these questions is provided below.

Q18. Which gender are you?

Response	Number of Respondents	Percentage
Male	1,511	46%
Female	1,531	46%
Prefer not to say	261	8%
Total Number of Respondents	3,303	100%

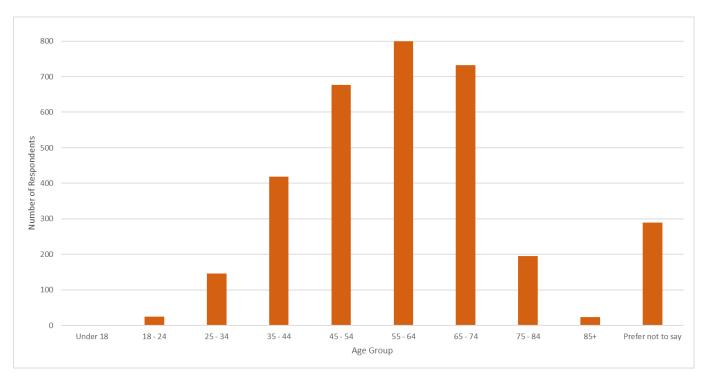


The response appears to be evenly split between men and women. Of those that gave their gender, there appeared to be particularly less women at 46% compared to the East Sussex census percentages (52%). Additionally, our 2016 customer satisfaction survey suggests that a greater proportion of site users seem to be female than in the general East Sussex population.

However, of the consultation survey respondents, 8% chose not to say and 82 people chose not to answer the question, so the gender split of respondents shown may not be entirely reflective of the reality.

Q20. Which of these age groups do you belong to?

	Number of	
Response	Respondents	Percentage
Under 18	2	0%
18 - 24	25	1%
25 - 34	146	4%
35 - 44	418	13%
45 - 54	677	20%
55 - 64	799	24%
65 - 74	732	22%
75 - 84	195	6%
85+	24	1%
Prefer not to say	289	9%
Total Number of Respondents	3,307	100%



Overall, 79% of the respondents were in the age range 35-74. This broadly reflects our 2016 customer satisfaction survey, and it appears that a greater proportion of our site users are aged 35 to 74 compared to the general county population at 52%. The majority of these were in the 45-74 age group which is concurrent with proportions of the site users in our satisfaction survey.

Neither our consultation respondents, nor the users of our sites surveyed in 2016, reflect the proportion of the general population in the county up to 34. Significantly less of this age group appear to use our sites and have responded to the consultation, although children under 16 are not permitted to use the sites.

Although the site users surveyed in 2016 showed similar proportions of those aged 75 and over at 13%, to those in the 2016 county population estimate at 12%, consultation respondents of this age numbered just 7% of the total. Despite directly emailing several local representative groups, including Age UK and seniors' forums (see Appendix 2 of this report), it is possible that we haven't reached those of 75 and over as well as we reached other age groups that use the sites.

Q22. To which of these ethnic groups do you feel you belong?

	Number of	
Response	Respondents	Percentage
White British	2,707	85%
White Irish	30	1%
White Gypsy/Roma	2	0%
White Irish Traveller	4	0%
White Other	98	3%
Mixed White and Black		
Caribbean	2	0%
Mixed White and Black African	2	0%
Mixed White and Asian	6	0%
Mixed Other	7	0%
Asian or Asian British Indian	6	0%
Asian or Asian British Pakistani	1	0%
Asian or Asian British		
Bangladeshi	0	0%
Asian or Asian British Other	1	0%
Black or Black British Caribbean	0	0%
Black or Black British African	1	0%
Black or Black British Other	0	0%
Arab	1	0%
Chinese	4	0%
Other ethnic group	21	1%
Prefer not to say	312	10%
Total Number of Respondents	3,205	100%

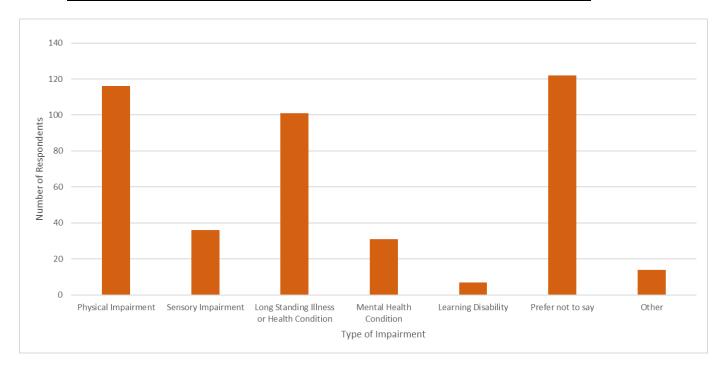
Of those that gave an ethnicity, 98% identified as a 'White' group, which is slightly higher than the East Sussex census at 96%. However, 492 people (14.5% of respondents to this question) chose not to answer this question, either by selecting the "prefer not to say" option or by making no response.

Q23. Do you consider yourself disabled as set out in the Equality Act 2010?

	Number of	
Response	Respondents	Percentage
Yes	224	7%
No	2,738	83%
Prefer not to say	318	10%
Total Number of Respondents	3,280	100%

Q24. If you answered yes to Q23, please tell us the type of impairment that applies to you (total number of **respondents** here was 348)

	Number of	
Response	Responses	Percentage
Physical Impairment	116	27%
Sensory Impairment	36	8%
Long Standing Illness or Health		
Condition	101	24%
Mental Health Condition	31	7%
Learning Disability	7	2%
Prefer not to say	122	29%
Other	14	3%
Total Number of Responses	427	100%



In 2016/17, 19% of adults of working age and 45% of adults over State Pension age reported a disability under the terms of Equality Act 2010, with mobility being the most prevalent impairment reported (Source: Family Resources Survey 2016/17).

In the 2011 county data, some 20% of people had a long-term health problem or disability, and in 9% of those their day-to-day activities were significantly limited.

The proportion of respondents who told us they are disabled was much less than this at 7%, and of those that told us the type of impairment they had, a physical impairment was the most frequently reported, followed closely by a long standing illness or health condition, with 71% having either a physical impairment or a long standing illness or health condition. 10% preferred not to say whether they were disabled or not, which could have affected the outcome.

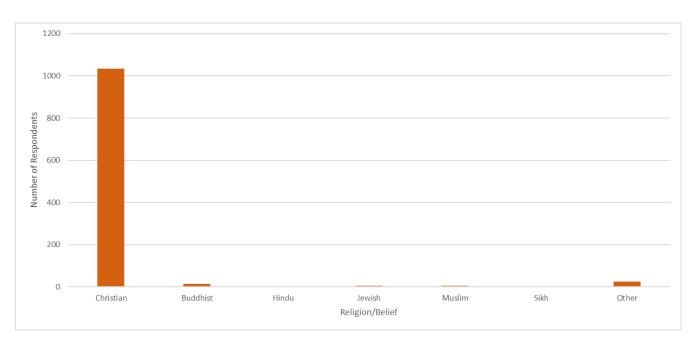
This does however reflect our latest customer satisfaction survey, to which 6% of respondents who use East Sussex sites told us they were disabled under the terms of the Equality Act 2010.

Q25. Do you regard yourself as belonging to any particular religion or belief?

Response	Number of Respondents	Percentage
Yes	1,096	34%
No	1,541	47%
Prefer not to say	605	19%
Total Number of Respondents	3,242	100%

Q26. If you answered yes to Q25, which one?

Response	Number of Respondents	Percentage
Christian	1,035	95.3%
Buddhist	15	1.4%
Hindu	2	0.2%
Jewish	5	0.5%
Muslim	5	0.5%
Sikh	0	0%
Other	24	2.2%
Total Number of Respondents	1,086	100%



Not all those that indicated they belonged to a religious or belief group went on to specify which. Of those that did, clearly the very large majority are Christian, nonetheless levels of the smaller religious groups in the county appear to be broadly reflected in the percentages of survey respondents, albeit in small numbers overall.

The final group of questions (19, 21, 27, 28 and 29) related to postcode, sexuality, transgender identity, partnership status and pregnancy rates among respondents, and these were used specifically for the Equalities Impact Assessment.

6.1 Equalities Impact Assessment

- 6.1.1 Through the Equalities Impact Assessment (see Appendix 2 to the Cabinet report) process, three main groups have been identified as likely to be more affected by the proposals. These are people aged 75 and over, people with certain disabilities, and people in rural communities.
- 6.1.2 Those aged 75 and over, and those with certain disabilities are less likely to be able to travel to an alternative recycling site in the event of site closures. The two sites proposed for closure are in rural parts of the county, and it is likely that residents may have further to travel to an alternative site. Additionally, people on lower incomes, such as some young working families, and some elderly residents and disabled people may be more impacted by the proposal to charge for non-household waste.
- 6.1.3 In terms of site closure, this may mean that these groups are likely to travel less frequently to an alternative site that is further away, or it may mean that they will incur additional fuel costs. However the impact will be less where people are able to link their visit to a recycling site with a trip for another purpose such as work, shopping or visiting friends and family.
- 6.1.4 To help avoid negative impacts on these groups, the County Council will work with the District and Borough Councils to ensure that residents are well informed of the ranges of other ways that they can dispose of their waste, including the comprehensive kerbside recycling and refuse collections and the 'assisted collection' service which gives extra help for elderly and less mobile residents. We will continue to promote other alternatives to visiting a household waste recycling site including the local recycling points, clinical waste collections, kerbside garden waste, bulky waste collections and home collections of reusable furniture by the charities.
- 6.1.5 Prior to the introduction of any changes, we would clearly advertise the changes to ensure that site-users are well-informed. We will continue to work with site staff to ensure that additional help on site is provided on request for those that need it, and continue to advertise this additional support that is already available. We will continue to listen to feedback from site users to endeavour to improve the accessibility of our HWRS service.

7. Conclusions

- 7.1 Our consultation encouraged respondents to make comments on a number of points including each individual proposal, and our overall approach. These comments have been useful in letting us know what is important to residents and their concerns about potential changes to the service. We have used this information to challenge our own HWRS Review documentation and assess whether or not our own assumptions are correct
- 7.2 Proposal 1: to charge for certain waste types
- 7.2.1 A higher level of support was received for this proposal than for the acceptability of the proposed changes overall, and 56%, over half of respondents, felt it was broadly acceptable.
- 7.3 Proposal 2: to close the recycling sites at Forest Row and Wadhurst
- 7.3.1 In terms of the proposal to close the Forest Row site, overall 47% found it broadly unacceptable and a large proportion, 34% were neutral. In relation to the proposal to close the Wadhurst site, overall 45% found it widely unacceptable and a similar 36% were neutral. Almost half of all respondents to the consultation questionnaire record Wadhurst or Forest Row as the site they use most often, and the proposed closure of these sites is clearly an important issue for respondents.

- 7.3.2 It is important to note that the views of local users of these two sites are very different to the views from all respondents above as they would be most affected by the proposal to close. For those respondents that use either Forest Row or Wadhurst as their main site, just under 1% thought that closing the sites was generally acceptable, and some 99% of respondents thought that closing their local site was widely unacceptable.
- 7.3.3 The comments and petitions received in response to the proposals to close Forest Row and Wadhurst sites show that the sites as a facility, along with the reuse shops, are highly valued by local users.
- 7.4 Proposal 3: to make changes to recycling site opening hours
- 7.4.1 There was considerable support for shortening opening times at the sites and 70% of respondents thought that this was broadly acceptable. When asked about opening Eastbourne and Crowborough sites for longer at the weekend and closing them during quieter times in the week, the majority of those that felt the question was applicable to them (70%) thought that the proposal was broadly acceptable.
- 7.4.2 For those respondents that said they use Eastbourne or Crowborough as their main site, there was even more support for the proposal. The proposal to extend the opening hours of the Eastbourne and Crowborough sites at weekends would benefit and help mitigate, at least in the catchment areas for those sites, negative effects on those of working age of reducing opening hours slightly during the week.
- 7.4.3 Similarly, making improvements to the Hailsham site may help mitigate negative effects to working age people in the catchment area of that site as a result of reducing opening hours slightly during the week.
- 7.5 Improving the Hailsham HWRS
- 7.5.1 We provided brief information about the Hailsham HWRS in our consultation but did not ask any direct questions about the possible improvements. Our 2016 customer satisfaction survey found that fewer users were positive about Hailsham HWRS than any other site, except Seaford. The satisfaction with the range of materials that can be recycled at Hailsham was 49% compared with 59% on average across all HWRSs. The feeling of safety was 7% lower than the average.
- 7.5.2 Improvements to the Hailsham site would result in benefits to site customers, allowing more space to park and to use the site, helping them to feel safer, and giving them the opportunity to recycle more materials. The site extension will also provide greater capacity to meet the increased customer demand arising from future housing growth planned for Hailsham and surrounding area. The better range of facilities will also mean that the planned improvements will pay for itself and deliver an annual saving.

7.6 Other survey questions

When asked about payment of a small fee to enter the HWRSs, the survey didn't evidence a great deal of support for the suggestion, and the majority of respondents, 57% thought it was broadly unacceptable. This however is not one of our current proposals, or something that we are planning to introduce as a result of this consultation.

7.7 In conclusion

7.7.1 Following our analysis of consultation responses and comments, and our HWRS review evidence, we do not consider that any new information has been presented that would lead us to withdraw our proposals. Through discussion with our contractor Veolia, we are exploring whether a full day closure at certain HWRSs would offer additional efficiencies

- over and above shorter times. Through discussions with Parish Councils we are also exploring how a HWRS could be operated by another organisation.
- 7.7.2 Although residents who live in close proximity to either of the sites proposed for closure would be inconvenienced by having further to travel to an alternative site, a relatively small number of our current service users overall would be affected. Our analysis of journey times (see the Habitats Regulation Assessment, Appendix 3 of the Cabinet report) also showed that most residents within the catchment area of the Forest Row site would not need to travel more than an extra 10 minutes each way to an alternative site.
- 7.7.3 We recognise that of those residents who use the sites proposed for closure, there will be some people who will be more affected by the loss of service, especially those that live close to the sites and visit them on foot, and those that may feel unable to drive very far, including the elderly and those with certain disabilities.
- 7.7.4 Council waste team officers have engaged with Wadhurst and Forest Row Parish Councillors and District Councillors to investigate potential options for alternative services provided by the community or business sector. If the decision is made to close sites, it is recommended that this engagement continues.
- 7.7.5 There may be people that want to use the sites during the times we have proposed reducing the opening hours. And some will be more affected than others in terms of the proposal to introduce charges for non-household waste, including those on lower incomes and those generating more of the non-household waste types to dispose of. However, it should be noted that the charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received.
- 7.7.6 The current network of 12 sites and free disposal of non-household waste provides residents with a good level of service. The level of service we are proposing ensures that we continue to comply with our statutory duties. We feel that overall, the potential impacts of the service changes are likely to be small and that our proposals will ensure the continuing provision of a good level of service for residents, with reasonable access to a network of HWRSs to meet the needs of current and future users.

Appendix 1: Summary of consultation correspondence and petitions received

The views of 31 members of the public and two MPs were shared with us by email, letter or phone call after the start of the consultation, along with representations from 12 Parish Councils, two District and County Councils, and three other organisations.

The respondents are listed in the table below. Their verbatim comments have been analysed and records are available in the Cabinet Members' room. Key stakeholder responses are also summarised in section 5 of this report.

Members of the public: 31
Pariah Causaila, 12
Parish Councils: 12
Arlington Berwick
Catsfield
Chalvington with Ripe
Ditchling
Forest Row
Frant
Hartfield
Horam
Isfield
Piddinghoe
Withyham
District/Borough/County Councils
Wealden District Council (via Cllr Galley)
West Sussex County Council
MPs
Nusrat Ghani
Stephen Lloyd
Sir Nicholas Soames (prior to consultation start)
Other Organisations
National Farmers Union
East Sussex Fire & Rescue Service
East Sussex Joint Waste Collection Partnership
Petitions received against site closure
Paper petition from Forest Row Parish Council (PC): 1,594 signatures
E-petition from Forest Row PC: 2,365 signatures
Paper petition from Wadhurst PC: 2,684 signatures
Paper petition from Frant PC: 151 signatures

Appendix 2: List of organisations contacted

The following organisations were contacted directly by the County Council, notified of the proposals and the consultation start and end dates, and encouraged to respond via the survey or in writing.

Third Sector Organisations	Other organisations included via East Sussex Strategic Partnership
3VA (Eastbourne, Lewes District and Wealden)	East Sussex Fire & Rescue Service
Action in Rural Sussex	Clinical Commissioning Groups in the county
Age UK/Age Concern East Sussex	Highways Agency
Ashdown Forest Conservators	JobCentre Plus
East Sussex Association for the Blind	Kent, Surrey and Sussex Community Rehabilitation Company (Seetec)
Eastbourne Seniors Forum	National Probation Service
Eastbourne Society (Civic)	NHS England - Surrey and Sussex Area Team
Environmental Protection UK	Sussex Associations of Local Councils
Friends of Lewes	Sussex Police
Hastings and St. Leonards Senior Forum	MPs / Councillors
Hastings Older People's Ethnic Group	Stephen Lloyd
Hastings Voluntary Action	Maria Caulfield
Lewes District Seniors Forum	Huw Merriman
Meridian Mature Citizens' Forum	Amber Rudd
Possability People	Nusrat Ghani
Rother Environmental Group	Lloyd Russell-Moyle
Rother Seniors' Forum	East Sussex District & Boroughs
Rother Voluntary Action	Lewes District Council
Seaford Seniors Forum	Hastings Borough Council
SpeakUp	Eastbourne Borough Council
Sussex Community Development Association	Wealden District Council
Sussex Deaf Association, East Sussex Division	Rother District Council
The Friends of Ashdown Forest	Brighton & Hove City Council
Transition Town Eastbourne	Town / Parish Councils
Transition Town Hastings	All in East Sussex
Transition Town Lewes	Other Local Authorities
Transition Wadhurst	West Sussex County Council
Wealden Senior Citizens Partnership	Kent County Council
WRAP (Waste and Resources Action Programme)	Surrey County Council
Public bodies	Hampshire County Council
Environment Agency	Adur & Worthing Council
Hastings Youth Council	Mid Sussex District Council
High Weald AONB Unit	Crawley Borough Council
Natural England	Tandridge District Council
South Downs National Park Authority	Sevenoaks District Council
Educational institutions	Tunbridge Wells Borough Council
University of Brighton	Ashford Borough Council
University of Sussex	Shepway District Council
Waste Partnerships & Inter Authority Working Groups	Brighton and Hove City Council
East Sussex Joint Waste Collection Partnership	Contractor partner
Waste Crime Practitioners Group	Veolia South Downs

Appendix 3 - Public Consultation Questionnaire

Comment on our proposals for East Sussex Recycling Sites Ends 15 May 2018

Household Waste Recycling Sites – Have Your Say

Overview

We're asking for your views on proposals for changes to our Household Waste Recycling Sites.

As part of our 30 year contract with Veolia, we've built facilities to deal with your recycling and garden waste and to recover energy from what goes into your bin. We want to keep waste to a minimum and get as much useful material as possible out of the dustbin and reused or recycled. We also provide places for you to take your waste and recycling.

In 2016/17, East Sussex residents together with the borough and district councils and the County Council recycled, reused or recovered energy from 95% of our household waste and only 5% went to landfill.

We carried out a review of our Household Waste Recycling Site service to try to identify where we might be able to make additional savings.

In this consultation, we'll ask you what you think about the specific proposals and our overall approach.

Why we are consulting

Our waste service has a contract with Veolia to run our twelve Household Waste Recycling Sites for us, where 66,000 tonnes of waste and recycling are taken yearly. This is about a quarter of the waste that East Sussex residents produce, the rest is collected from homes, litter bins and streets. We want to get the maximum value out of waste, and almost sixty per cent of the waste brought to the sites is recycled, composted or reused, with most of the rest used as fuel for energy.

It costs nearly £10 million a year to run our sites and to recycle and dispose of all the waste that residents bring. Savings have already been made since 2014 by reducing opening hours at three of our twelve sites.

We now need to reduce our annual Waste and Recycling budget by £720,000, while providing residents with a reasonably accessible Household Waste Recycling Site service. And in future years we may have to make even more savings as a result of the budget pressures we continue to face.

The Council has already made savings of around £112 million this decade. Due to further cuts in council funding from the Government, we need to save an extra £47 million by 2021, with £17 million to be saved in the next financial year. Meanwhile we need to protect services for the most vulnerable.

It is getting more difficult to find ways to make savings and tough choices will have to be made by the Council's elected Members.

Our Household Waste Recycling Site Review

The review of our Household Waste Recycling Sites looked at ways of making savings while considering residents' needs. We looked at a variety of information, including use of the sites and our legal duties. We found that:

• Disposal of certain types of waste is expensive

Disposal of items such as soil, rubble, plasterboard, tyres and asbestos is costly for us compared to other councils which charge residents to dispose of these waste types at their recycling sites - in East Sussex we don't charge.

• We can still provide a good service with fewer Household Waste Recycling Sites

In East Sussex we offer an above average number of recycling sites compared with similar councils. We assessed our sites looking at aspects like the number of visits, how much waste is brought and how much they cost to run. Over 98% of residents are currently able to reach a site within a 20 minute drive. If the smaller, part-time sites at Forest Row and Wadhurst closed, over 98% of residents would still be able to reach a site within a 20 minute drive and our nearest remaining sites would have space for the additional waste.

. Opening hours at the recycling sites could be altered to fit better with demand

Weekends are the busiest time for the sites. Most of our sites open all day at weekends, but Eastbourne and Crowborough only open in the morning. We think opening these two sites for longer at weekends would improve the service for residents. Most of the sites are less busy during the week, especially at the beginning and the end of the day. We may be able to reduce our costs if we closed the sites during quieter times in the week.

• Hailsham Household Waste Recycling Site could work better

The Hailsham site has the poorest recycling rate of the all sites. Improving the site layout would mean more waste could be separated for recycling. This would reduce costs and provide a better service for customers.

• Fly-tipping is not likely to increase as a result of changes

We looked carefully at evidence from councils who've made similar changes to those we're proposing, including Surrey, Hampshire and West Sussex. They saw no increase in fly-tipping, or just a slight increase in line with national trends. We have not found clear evidence to show that residents will fly-tip if they can't use a site, or if they have to pay for something that used to be free. If we make site changes, we'll check local fly-tip data for signs of an impact. We'll also continue to work with the district and borough councils, the Environment Agency and the Police to prevent and deal with fly-tipping.

For more information see the Household Waste Recycling Site review report and the FAQs on our website: eastsussex.gov.uk/wasteconsultation

What changes are proposed?

As a result of the recycling site review, we're now proposing to make these **changes**:

- Charge for certain waste types that are not 'household waste', i.e. rubble, soil, plasterboard, tyres and asbestos.
- Close the part-time recycling sites at Forest Row and Wadhurst.
- Change recycling site opening hours to better suit demand.
- Improve the layout of Hailsham recycling site.

We believe we can make these changes to the service while maintaining a good level of service for residents.

How to take part in this consultation

Fill in and return the following survey by midnight on 15 May 2018 – we expect it to take around 15 minutes to complete.

Completed surveys can be handed to staff at East Sussex libraries or posted back to us at: Waste Consultation, West B Floor, County Hall, St Anne's Crescent, Lewes, BN7 1UE.

If you need the survey in another format, call us on 0345 60 80 194 or email us at waste@eastsussex.gov.uk

If you need more help to take part in the survey, please let us know.

We'd like to hear from any residents of East Sussex, whether you're a regular user of our recycling sites or not. We also welcome feedback from charitable or community organisations with an interest in the service.

What happens next?

At this stage, no decisions have been made on our proposals.

Once the consultation is complete, your views will be presented to East Sussex County Council's Cabinet in summer 2018 to help them make a final decision.

Give Us Your Views

he Recyclin	g Site you use:
Q1. Do you	use a Household Waste Recycling Site in East Sussex?
	Yes
1	No
Q2. If yes, wh	nich site do you use most often (please tick one box):
	Crowborough
	Eastbourne
	Forest Row
	Hailsham
□ !	Hastings (off Bexhill Road)
	Heathfield
	Lewes
	Maresfield
_ I	Mountfield
_ I	Newhaven
	Seaford
□ \	Wadhurst

Proposal 1:

Yes

Charge for certain waste types, i.e. rubble, soil, plasterboard, tyres and asbestos Legally, the County Council only has to accept and pay for 'Household Waste' that residents bring to the sites. Rubble, soil, plasterboard, tyres and asbestos are not 'Household Waste' so we don't have to accept them for free at the Household Waste Recycling Sites. At present, we don't charge residents to bring waste to our sites, but we do limit the amount of rubble, soil, plasterboard, tyres and asbestos brought in. Many councils already charge for some or all of these waste types, including nearby authorities in Surrey and Hampshire. A small charge to residents for these items at the recycling sites would cover the cost of dealing with it. We'd expect charges to be something like this: Rubble, bricks, tiles £4 per rubble sack* Soil £4 per rubble sack* **Plasterboard** £4 per rubble sack* **Bonded asbestos** £6 per sheet **Tyres** £2 per tyre *approximate sack size 55 x 85cm We would remove the existing monthly limit for these items. All other 'Household Waste' that residents currently bring to the sites, including garden waste, furniture, electricals, recycling and general waste will continue to be free of charge to dispose of at the sites. No waste from businesses is allowed at any of our recycling sites and it is the job of our contractor to make sure that it is kept out. Q3. What do you think of the proposal to charge for the disposal of rubble, soil, plasterboard, tyres and asbestos to cover our disposal costs? Perfectly acceptable Acceptable Neutral Unacceptable Totally unacceptable Q4. Do you have any comments on Proposal 1 and how it could affect you or your organisation? No

Proposal 2:

Close the part-time recycling sites at Forest Row and Wadhurst

We propose to permanently close two of the smaller Household Waste Recycling Sites – at Forest Row and Wadhurst.

We consulted on closing these sites in 2013, but decided to close them from Monday to Thursday rather than shut them permanently. Due to the financial situation and the budget pressures we face, unfortunately we now need to make more savings.

The Forest Row and Wadhurst sites currently open three days a week. Our traffic log shows they have fewer visitors per hour of opening than all the other sites, and they receive less waste. This means they're relatively more expensive to run. Forest Row receives around ten per cent of the visitors and waste that our busiest site (in Hastings) accepts.

Our review found that compared to similar English councils with similar population sizes and geographical areas, we offer an above average number of recycling sites in East Sussex.

Currently over 98% of residents can reach a site within 20 minutes. We appreciate that reducing the number of sites may mean a longer journey for some residents to their next nearest site. However we think our proposals will ensure there are enough sites over the county within reasonable reach of residents.

Other nearby sites within the network including Maresfield, Heathfield and Crowborough would be able to receive the additional visitors and waste from Forest Row and Wadhurst. If the Household Waste Recycling Sites at Forest Row and Wadhurst closed, over 98% of East Sussex residents would still be able to reach a site within a 20 minute drive of their home.

For more information see the Household Waste Recycling Site review report and the FAQs on our website: eastsussex.gov.uk/wasteconsultation

	sed Forest Row and Wadhurst recycling sites, do you agree the remaining ten sites he county would give residents reasonable access to the service?
	Strongly agree
	Agree
	Neither agree or disagree
	Disagree
	Strongly disagree
Q6. What do	you think of the proposal to close Forest Row Household Waste Recycling Site?
	Perfectly acceptable
	Acceptable
	Neutral
	Unacceptable
	Totally unacceptable

Q7. What do you think of the proposal to close Wadhurst Household Waste Recycling Site?					
Perfectly acceptable					
☐ Acceptable					
☐ Neutral					
☐ Unacceptable					
☐ Totally unacceptable					
Q8. Do you have any comments on Proposal 2 and how it could affect you or your organisation?					
□ No					
☐ No ☐ Yes					

Proposal 3:

Changes to recycling site opening hours

We're looking at changing opening times at sites where possible, to fit better with times that residents use them most. This could mean sites closing at quieter times when there's less demand and some sites opening for longer at the busier time of weekends.

Most of our recycling sites open from 8 or 9am until 4 or 5pm every day. The sites are less busy at the beginning and end of the day, and around ninety per cent of our customers visit the recycling sites between 9am and 4pm.

It could be more efficient for us to close the sites during the less busy hours to help us reduce our costs. We're proposing the sites could open for slightly shorter days, remaining open during the peak time of 9am to 4pm.

peak time of ban to 4pm.
Q9. Thinking about the times you would want to visit the recycling sites, what do you think of slightly shorter opening times?
Perfectly acceptable
☐ Acceptable
☐ Neutral
Unacceptable
Totally unacceptable
The sites at Crowborough and Eastbourne close in the afternoon on Saturdays and Sundays.
Weekends are the busiest time for the sites. So we think opening the Crowborough and Eastbourne sites all day at weekends, and closing the sites during the less busy hours or days in the week, would be more convenient for residents.
Q10. Thinking about the times you would want to visit Crowborough or Eastbourne sites. What do you think about keeping these sites open later at the weekend and closing them at quieter times during the week?
Perfectly acceptable
☐ Acceptable
☐ Neutral
☐ Unacceptable
Totally unacceptable
■ Not applicable – I don't visit these sites
Q11. Do you have any comments on Proposal 3 and how it could affect you or your organisation?
□ No
☐ Yes
59

Question for information-gathering only:

The principle of a small charge to enter the recycling sites

We're not currently planning to introduce entry charges at our recycling sites. This Government does not allow the Council to charge an entry fee to recycling sites. However if this changed in future, charging residents a small entry fee could help to prevent further reductions to the service.

We'd like to hear your views on this. We're interested in the possibility of charging for entry because we may have to make more savings in future years as we face greater budget pressures.

Please note that this question does not form part of our current savings proposals.

Q12.	In principle, would you be prepared to pay a small fee to enter the Household Waste Recycling Sites (for example, £1 per visit)?						
	Perfectly acceptable						
	☐ Acceptable						
	☐ Neutral						
	☐ Unacceptable						
	Totally unacceptable						

Your opinion of the recycling site service proposals

As a result of our review of the Household Waste Recycling Sites, we're proposing the changes described previously as a way to help make the £720,000 per year of savings that we need:

- Charge for certain waste types that are not 'household waste', i.e. rubble, soil, plasterboard, tyres and asbestos.
- Close the part-time recycling sites at Forest Row and Wadhurst.
- Change recycling site opening hours to better suit demand.
- Improve the layout of Hailsham recycling site.

We think these changes would allow us to continue to provide a level of service county-wide that meets residents' needs within future budget pressures

For more information see the Household Waste Recycling Site review report and the FAQs on our website: eastsussex.gov.uk/wasteconsultation

Q13. Thinking about what we've told you about our proposals so far, how do you feel about the proposals overall as a way to make savings?								
Perfectly acceptable								
☐ Acceptable								
☐ Neutral								
☐ Unacceptable								
	Totally unacceptable							
Q14. Your preferred options:								
We appreciate that you may have strong views about some or all of our proposals, but we want to understand what is most important to you.								
Thinking about the proposals outlined in this survey, please rank the choices below from 1 to 4 in order of acceptability, 1 being the choice you find most acceptable and 4 the one you find least acceptable.								
Pleas	e sele	ect a dif	ferent n	number for each option. For example, two options shouldn't be ranked equal 1 st :				
Char	ge fo	r certai	in wast	te types at the sites, i.e. rubble, soil, plasterboard, tyres and asbestos				
1	2	3	4	(please circle one choice)				
Close	e the	part-tir	ne rec	ycling sites at Forest Row and Wadhurst				
1	2	3	4	(please circle one choice)				
Change opening hours at the recycling sites to better suit demand								
1	2	3	4	(please circle one choice)				
Introduce a small charge to enter the recycling sites (<i>in principle</i> as this is not allowed at present) 1 2 3 4 (please circle one choice)								
•	_	J	7	(picase circle one onolog)				
Q15. Do you have any suggestions for other ways to make savings at the recycling sites?								
		No						
		Yes						
				\$1				

Q16. Are you responding as a resident or as part of an organisation? Please tick one box								
		Resident						
		Organisati	on					
		Prefer not	to say					
Q17. If yo	u are a	answering a	s part of an or	ganis	ation, what type	of organ	isation are	you?
		Business						
	Charitable organisation							
		Communit	y or voluntary	group)			
		District or	borough cound	cil				
		Town or pa	arish council					
		Prefer not	to say					
		Other, plea	ase describe					
About y	/ou							
		ke sure tha se question	•	reate	d fairly and equ	ally and t	that no one	gets left out. That's why
		the information		us wi	th anyone else.	. We will	only use it	to help us make decisions
If you wo	uld rat	her not ans	wer any of the	ese qu	uestions, you do	on't have	to.	
·			·	·	. •			
Q18. Are	you	? Please	tick one box					
	Mal	9			Female			Prefer not to say
Q19. Do you identify as a transgender or trans person? Please tick one box								
] Yes				No			Prefer not to say
Q20. Which of these age groups do you belong to? Please tick one box								
	und	er 18	25-34		45-54		65-74	☐ 85+
	-] 18-2		35-44		<u> </u>		_] 75-84	Prefer not to say
_								•
Q21. Wh	at is y	our postco	ode?					

	thich of these ethnic groups se tick one box	do you feel you	bel	ong? (source: 2011 census)				
	White British			Asian or Asian British Indian				
	White Irish			Asian or Asian British Pakistani				
	White Gypsy/Roma			Asian or Asian British Bangladeshi				
	White Irish Traveller			Asian or Asian British other*				
	White other*			Black or Black British Caribbean				
	Mixed White and Black Carib	bean		Black or Black British African				
	Mixed White and Black Africa	n		Black or Black British other*				
	Mixed White and Asian			Arab				
	Mixed other*			Chinese				
	Other ethnic group*			Prefer not to say				
	ur ethnic group was not specifice describe your ethnic group.	ied in the list						
The Equality Act 2010 describes a person as disabled if they have a longstanding physical or mental condition that has lasted or is likely to last at least 12 months; and this condition has a substantial adverse effect on their ability to carry out normal day to day activities. People with some conditions (cancer, multiple sclerosis and HIV/AIDS, for example) are considered to be disabled from the point that they are diagnosed. Q23. Do you consider yourself to be disabled as set out in the Equality Act 2010?								
Pleas	se tick one box Yes	□ No		Prefer not to say				
ш	103			I Total flot to say				
You i	Q24. If you answered yes to Q23, please tell us the type of impairment that applies to you. You may have more than one type of impairment, so please tick all that apply. If none of these apply to you please tick 'Other' and give brief details of the impairment you have.							
	Physical impairment							
	Sensory impairment (hearing	and sight)						
	Long standing illness or health condition, such as cancer, HIV, heart disease, diabetes or epilepsy							
	Mental health condition							
	Learning disability							
	Prefer not to say							
	Other*	Г						
*If otl	her, please specify							
Q25. Do you regard yourself as belonging to any particular religion or belief? Please tick one box								
	Yes	☐ No		Prefer not to say				

Q26. If you answered yes to Q25, which one? Please tick one box									
☐ Christian ☐ Hindu	☐ Muslim	Any other religion, please specify							
☐ Buddhist ☐ Jewish	Sikh								
Q27. Are you Please tick one box									
☐ Bi/Bisexual	Gay woman/Le	esbian							
☐ Heterosexual/Straight	Gay Man	☐ Prefer not to say							
Q28. Are you currently pregnant or have you been pregnant in the last year? Please tick one box									
Yes	☐ No	☐ Prefer not to say							
Q29. Are you married or in a civil partnership? Please tick one box									
Yes	☐ No	☐ Prefer not to say							
Thank you for taking the time to complete this questionnaire. Your views are important to us.									
Completed surveys can be handed to staff at East Sussex libraries or posted back to us at: Waste Consultation, West B Floor, County Hall, St Anne's Crescent, Lewes, BN7 1UE.									



Produced by the East Sussex County Council Waste team, in conjunction with MCL All data and graphs in this document @ MCL.