

Cabinet 26 June 2018

Appendix 6

HWRS Service Review, December 2017



Household Waste Recycling Site Service Review December 2017

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1 Introduction

East Sussex County Council works with the five District and Borough Councils within the County - Eastbourne, Hastings, Lewes, Rother and Wealden – to collect waste and recycling from kerbside, provide recycling sites and further options for recycling, reuse, composting and energy recovery. Whilst the District and Boroughs collect the waste, East Sussex County Council operates the Household Waste Recycling Sites and is responsible for composting waste and dealing with waste that's not collected for recycling.

The East Sussex Joint Waste Strategy sets out how we work together to manage waste within the County and adheres to the 5-stage Waste Hierarchy as laid out in the nationally adopted Waste Framework Directive (2008/98/EC)¹



Over the past ten years we have dramatically changed the way we handle household waste in East Sussex. In that time we have:

- **more than doubled** the amount of waste we recycle and compost; and
- **reduced** the amount of waste sent to landfill by 90%

We continue to review the waste services we offer to the public to ensure they remain fit for purpose whilst offering residents value for money. This review focuses on the service East Sussex County Council provides at its 12 Household Waste Recycling Sites (HWRSs) located across the County on the map below.



¹ <http://ec.europa.eu/environment/waste/framework/>

HWRs continue to have a significant role in enhancing the recycling and waste management services that local authorities provide for the public. They accept significant tonnages of waste and can achieve high recycling rates, providing a valuable service to local residents. These sites also provide residents with an alternative to kerbside collections for the responsible disposal, recycling or re-use of their household waste, particularly for items that are not collected or are costly to collect at the kerbside.²

Our 12 HWRs are an integral part of the Integrated Waste Management Services Contract (IWMSC) that was signed in April 2003 with Veolia Environmental Services South Downs Ltd (then known as Onyx South Downs Ltd) with East Sussex County Council and Brighton & Hove City Council to manage the disposal of refuse and recycling across the County.

Both authorities tendered the contract after being awarded £114 million in government PFI credits, of which £76 million relates to East Sussex County Council and £38 million to Brighton & Hove City Council. A five year extension was agreed in 2008 and the contract will now end in March 2033.

The network of 12 sites in East Sussex is a popular service with residents. The sites receive 1.6 million visits per year and handle about a quarter of the total waste that East Sussex residents produce. The sites also recycle compost or reuse almost 60% of the materials that are brought to them by residents and provide containers for up to 36 different materials.

Household Waste Recycling Sites Service Review 2013

A previous review was carried out in 2013 (focusing only on East Sussex County Council sites) and, after a public consultation exercise was conducted; three sites – Forest Row, Seaford and Wadhurst reduced opening hours to three days per week.³

2 Relevant Legal Duties of Waste Disposal Authorities

East Sussex County Council, acting in its capacity as a Waste Disposal Authority (WDA) is required by the Environmental Protection Act 1990, section 51⁴ to provide reasonably accessible Household Waste sites for the free disposal of household waste. There is no specified minimum required number of sites or mandatory opening times although they must be open for part of either Saturday or Sunday

In order to put the obligations of the EPA in perspective, it is useful to break it down into its prescriptive elements:

Environmental Protection Act 1990 Section 51	Interpretation
It shall be the duty of each waste disposal authority to arrange for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited	The number of facilities is not prescribed
...they must be provided for persons resident within the county:	There is no requirement to provide any free facilities for residents who live outside East Sussex
They must accept residents' own household waste free of charge	There is no requirement to accept any waste other than a residents own household waste free of charge. Currently in East Sussex there are a number of non-household wastes accepted for free

² Wrap 'Household Waste Recycling Centres Guide', 2016: <http://www.wrap.org.uk/content/household-waste-recycling-centres-guide>

³ East Sussex County Council Household Waste Recycling Sites Service Review 2013

⁴ Environmental Protection Act 1990 http://www.legislation.gov.uk/ukpga/1990/43/pdfs/ukpga_19900043_en.pdf

Environmental Protection Act 1990 Section 51	Interpretation
The arrangements made by a waste disposal authority shall be such that each place is situated either within the area of the authority or so as to be reasonably accessible to persons resident in its area	There is no definition of what is reasonably accessible, both in terms of distance travelled and vehicle type accepted
The arrangements made by a waste disposal authority shall be such that each place is available for the deposit of waste at all reasonable times (including at least one period on the Saturday or following day of each week except a week in which the Saturday is 25th December or 1st January)	There is no definition of reasonable times other than the availability for a period on a Saturday or Sunday.

3 Current Level of Service and Needs Analysis

With our HWRS network being able to be benchmarked against national data, other authorities and statutory duties, we are able to consider if we are meeting residents needs in terms of appropriate access to a HWRS. This section builds a picture of the level of service that we provide and how well this meets the needs of our residents. Section 5 'HWRS Service & Performance' then takes this further by providing an analysis of how well the network is performing. This section also provides information on customer satisfaction which provides us with critical insight on how well our HWRS service is received by residents. In the latest HWRS Customer Satisfaction surveyed carried out, our contractor - Veolia - reports an 89% satisfaction rate across the network.⁵ Residents reported being most satisfied around aspects of site safety, the range of materials able to be recycled and helpful site staff.

The NACAS recommendations for minimum levels of HWRC provision

WRAP⁶ 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)⁷ recommendations for minimum levels of HWRC provision. These recommendations are based on journey times, catchment areas, waste tonnage throughout at sites and households/population per HWRS.

NACAS Measure	Provision in East Sussex
Maximum catchment radii of three miles in urban areas and seven miles in rural areas covering the great majority of residents	<i>See below and full accessibility study</i>
Maximum driving times to a site for the great majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas; though preferably less than this by the order of 10 minutes in each case.	<i>See below and full accessibility study</i>
At least one site per 143,750 residents, with a maximum throughput for any site of 17,250 tonnes per annum	<i>See below</i>

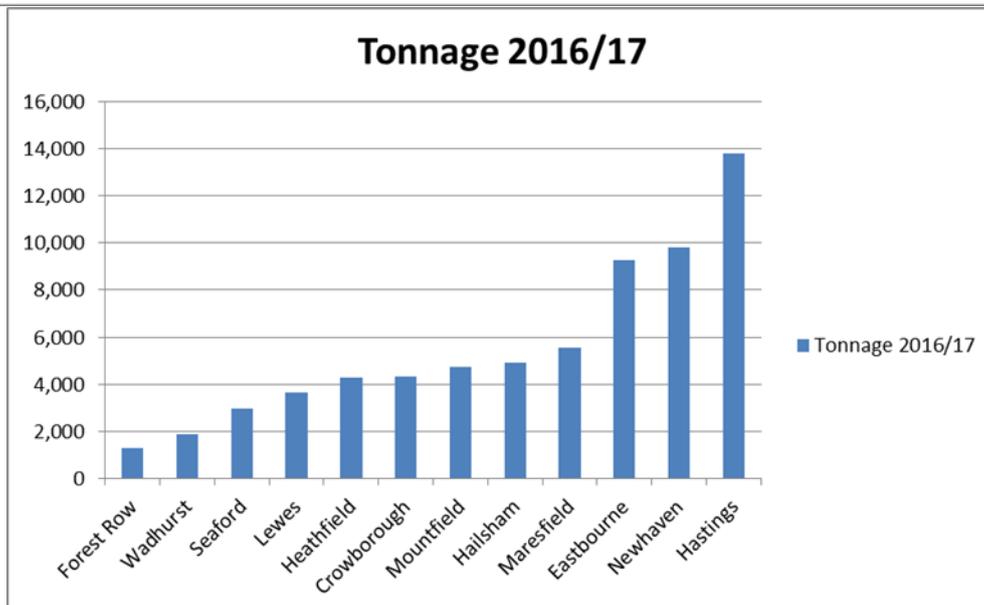
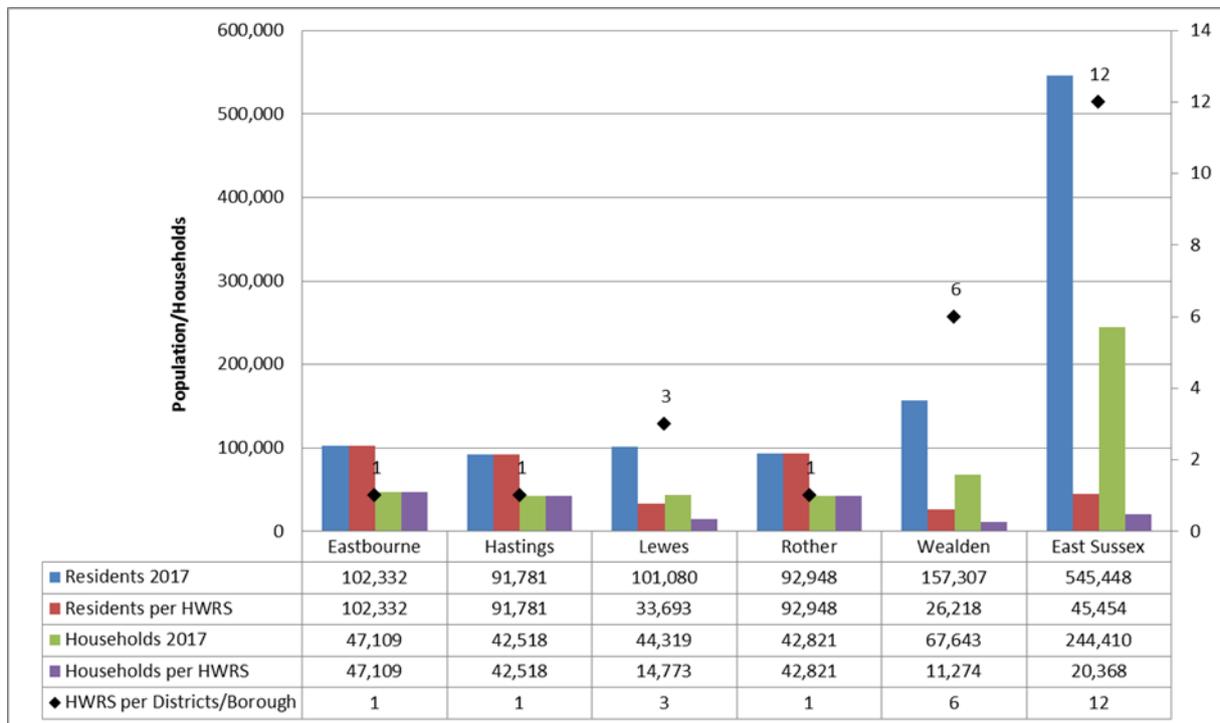
⁵ Veolia, 2016 HWRS Satisfaction Survey

⁶ 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

⁷ 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

HWRS Service Provision across East Sussex

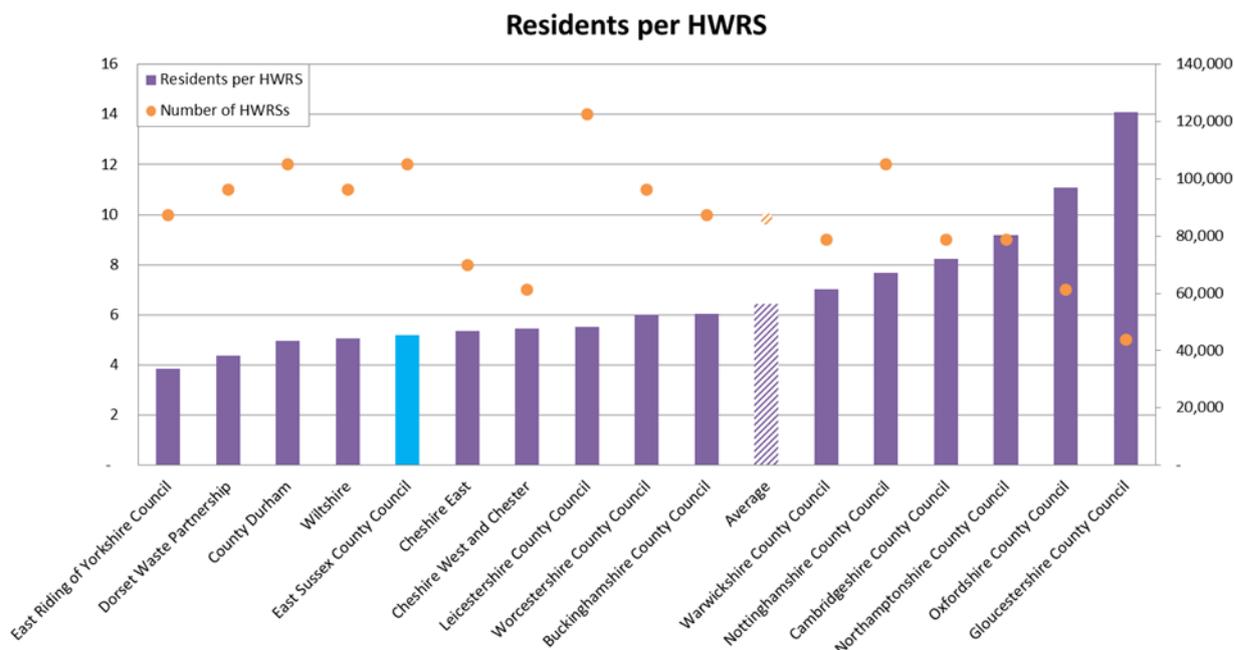
The two graphs below shows that East Sussex is well within the NACAS guidelines of at least one site per 143,750 residents and a maximum throughput of 17,250 tonnes per annum for an individual site.



Comparison of HWRS sites against total number of residents

Compared with a selection of similar authorities, East Sussex County Council currently offers an above average number of HWRSs, and is above average in terms of the number of residents per site, as well as the number of households per site, based on Waste Data Flow data⁸.

The chart below shows the number of residents per HWRS for East Sussex County Council compared to county and unitary councils which have similar-sized populations within similar-sized areas. These councils were selected using the CIPFA (Chartered Institute of Public Finance and Accountancy) Nearest Neighbours Model.⁹



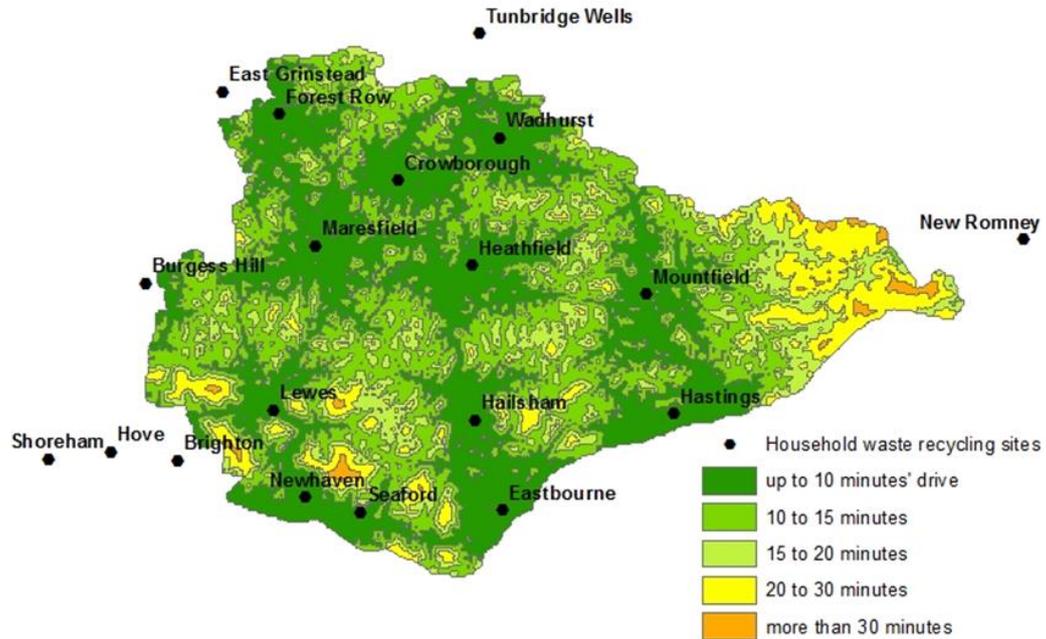
The average number of residents per site for the above group of 16 'nearest neighbour' councils is 59,642 and the average number of sites is 10. East Sussex currently offers an **above average service** in terms of the number of sites, and the number of residents per site and households per site, compared with other English councils with similar population sizes and geographical areas

⁸ WasteDataFlow is the web based system for municipal waste data reporting by UK local authorities to government

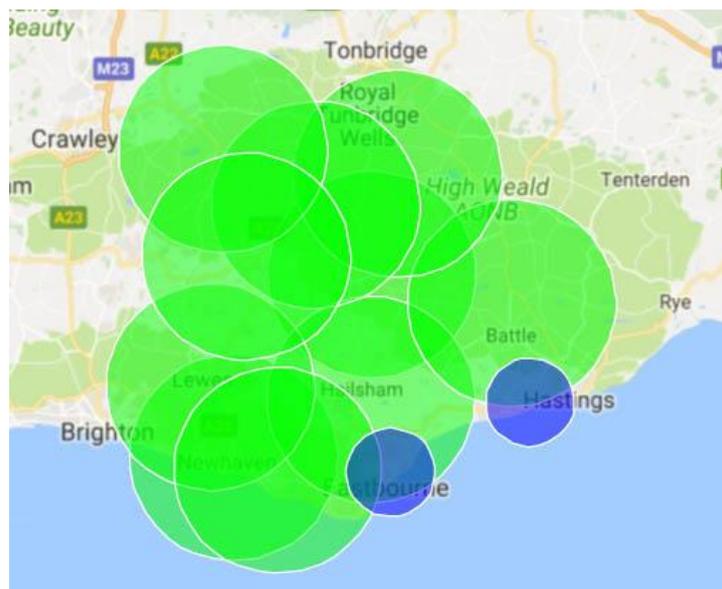
⁹ <https://www.cipfastats.net/resources/nearestneighbours/profile.asp?view=select&dataset=england>

Site Accessibility

The NACAS recommendation suggests a maximum driving time to a site for the great majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas. The full accessibility study is covered in more detail in Appendix 10. However, it is worth noting that after measuring against the NACAS recommendation, the East Sussex network compares favourably with 98.4% of residents currently able to reach a site within 20 minutes.



The NACAS recommendations also cite recommended maximum catchment radii of three miles in urban areas and seven miles in rural areas covering the 'great majority of residents'. Looking at East Sussex provision, the map below showing radii of seven miles (green – 'predominantly' and 'mainly' rural) and three miles (blue - urban) shows that the great majority of residents are covered and the gaps in provision are areas that are relatively unpopulated.



4 HWRS Service Costs

Current Service Costs

Operating across 12 sites, the Household Waste Recycling Site service is a significant network of infrastructure. As such, this service requires considerable financial resource.

Under the IWMSC East Sussex County Council pay a management fee for the contractor to operate the HWRS network. This is a fixed fee per HWRS, indexed each contract year. The fee was calculated based on estimates at contract award to cover capital and operating costs of each site, plus a contribution to overall management, overheads and contractors return. The management fees per site for 2017/18 total £2.55million for East Sussex County Council.

East Sussex County Council also pays for each tonne of waste that is handled at the sites, and the level of payment varies depending on how the waste is disposed of or recycled. This amounts to £7.12 million to East Sussex County Council. Of this £0.99million relates to non-household waste types including materials like soil, hard-core, tyres and plasterboard. East Sussex County Council does not receive a share of any income received for waste handled at the sites.

The cost of the HWRS Service to East Sussex County Council is shown below -

Cost of Household Waste Recycling Sites

	ESCC
Management fees	£2.55m
Disposal of household waste	£6.13m
Disposal of non-household waste	£0.99m
Total cost	<u>£9.67m</u>

5 HWRS Performance and Usage

East Sussex County Council closely monitors usage of its HWRS network through a wide range of metrics including waste tonnage data, visitor statistics, resident satisfaction and contractor performance monitoring. By combining these it is possible to gain a clear oversight of where the network is performing well and where there is room for improvement

The table below features some key performance indicators of the HWRS network across the county. Following on from the table is some commentary around the various aspects illustrated.

HWRS Site Performance

Performance Element	Crowborough	Eastbourne	Forest Row	Hailsham	Hastings	Heathfield	Lewes	Maresfield	Mountfield	Newhaven	Seaford	Wadhurst
Tonnage	4,325	9,261	1,279	4,902	13,812	4,293	3,623	5,536	4,732	9,814	2,966	1,882
Chargeable waste types 2016/17	705	1,602	168	827	1,970	677	430	831	698	1,788	385	309
Type of site (single/split level)	Split	Single	Single	Split	Split	Split	Single	Split	Single	Split	Single	Single
Stand alone or co-located	stand alone	co-located with WTS	stand alone	stand alone	co-located with WTS	stand alone	stand alone	co-located with WTS	stand alone	stand alone	stand alone	stand alone
Recycling performance 2016/17	64%	55%	58%	43%	54%	58%	66%	63%	53%	61%	64%	59%
Reuse performance 2016/17	16%	19%	16%	17%	13%	17%	15%	17%	16%	18%	14%	18%
Landfill performance 2016/17	10%	10%	36%	48%	7%	18%	8%	11%	16%	14%	10%	27%
Recovery performance 2016/17	27%	35%	6%	9%	40%	24%	27%	27%	32%	25%	27%	14%
Visitor numbers annualised	118,567	195,320	40,153	94,011	336,477	109,920	105,352	152,584	102,271	254,320	83,923	44,964
Av. Visits/hr open	47	86	31	35	107	34	36	49	33	82	65	31

Tonnage

Total tonnage across the network (2016/17) was approximately 66,500t which equates to about one quarter of the total tonnage going through the County's Waste Disposal Contract with Veolia.

Whilst not always directly comparable on a like-for-like basis, it is nonetheless useful to note the significant differences in tonnages handled at specific sites. For example, Forest Row which has operated on reduced opening since the 2013 review handles less than 10% of the total waste deposited at our busiest site in Hastings. Whilst this is obviously in the context of a three-day opening versus a seven-day opening pattern, it nonetheless has resulted in a waste facility taking in relatively small fraction of the total tonnage deposited across the network. Forest Row handles less than 2% of the total tonnage passing through the HWRS network whereas Hastings alone handles approximately 21% of the total HWRS tonnage.

Site characteristics can also be seen by the kilogram per visit giving an indication of how the site is used by residents. Forest Row has the lowest kilogram per visit at just 31kgs/visit. The second lowest is another of the three day per week sites – Seaford at 33kgs/visit. The highest is Hailsham at 52kgs/visit. The average across the network is 39kgs/visit.

Site Demand

Annualised visitor numbers show that, across the network of 12 HWRSs, there are approximately 1.6 million visits. Within that figure, some allowance should be made for operational servicing however Veolia consider this would be an insignificant amount against the visits made by residents.

By far, Hastings has the most visitors at over 336,000 per year or just over 900 visits a day.

Low demand can also be evidenced via site hourly usage during open hours. Wadhurst averages 31 resident visits an hour whilst Hastings is handling an average of 107 residents an hour and this is over a seven day a week, rather than three day a week, opening pattern. This low frequency per hour opening is also reflected at one of the other three-day-a-week opening sites – Forest Row (also an average of 31 visits per hours open) - although Seaford is significantly higher at 65 visits an hour which makes it the fourth busiest site in terms of visitors per open hour.

Time of Day

All sites experience a pronounced peak in the middle of the day and this peak starts at 11am and continues to about 2-3pm when usage drops off.

The sites are least busy at either end of their operating days with usage broadly similar in both their first and last hours.

Time of Year

Clear seasonal trends can be seen across all 12 HWRSs with three significant peak periods – immediately post-Christmas & New Year, the Easter Bank Holiday and August Bank Holiday although the latter two peaks sit within generally busier periods.

Using Hastings as an example, just under 18% of the sites total visits are in the winter months of December, January and February. During the peak summer months of June, July and August, the site receives 30% of its total visits. The difference is slightly less than would be perhaps expected.

This pattern is repeated at one of the smaller sites at Wadhurst that receives 20% of its visits in winter and, like Hastings, 30% of its total visits in summer.

As spring contains the busy Easter and May Bank Holiday periods, the 'low season' for HWRS access is autumn.

The data available will allow the Waste Team to analyse in more detail when sites are in demand and when they are less so. This will allow, for each HWRS, a refined usage profile to be produced which will help deliver future need.

Non Household Waste Deposited at HWRS

As previously covered, we have a statutory duty as a Waste Disposal authority to provide reasonably accessible Household Waste sites for the free disposal of household waste. However, our sites still accept the deposit of significant volumes of non-household waste. Bonded asbestos, hardcore, plasterboard, soil and tyres are not classed as household waste and as such, under the Controlled Waste Regulations 2012, local authorities are not obligated to accept them for free at the HWRSs. At present, we have a policy in place to limit the amount that the public can deliver in a calendar month, outlined in the table below:

Material	Quantity per month
Bonded asbestos	4 sheets / 6 x 25kgs bags (Eastbourne, Hastings, Heathfield and Newhaven sites only)
Hardcore/soil	6 x 25kg bags
Plasterboard	4 sheets / 6 x 25kgs bags (Eastbourne, Crowborough, Hastings, and Newhaven sites only)
Tyres	2 per month (Eastbourne, Hastings, Lewes, Maresfield and Newhaven sites only.)

Despite these restrictions, 10,392 tonnes of non-household waste was accepted at the 12 HWRSs across the network in 2016/17, costing East Sussex approximately £0.99m in disposal costs.

Customer Satisfaction

How residents experience the HWRS network is important to East Sussex County Council and its contractor, Veolia. In its most recent Customer Satisfaction Survey, Veolia report¹⁰ an 89% satisfaction rate across the network.

Three in five users reported being 'very satisfied' with the site they used with Maresfield, Mountfield, Lewes and Newhaven enjoying the highest levels of satisfaction. The lowest satisfaction was reported at Seaford with just 77% reporting as being positive which represents a 19% drop on the previous survey in 2014.

The survey highlighted a slight decrease in the number of people reporting as using a HWRS – 64% - from the 2014 version where 69% reported using a HWRS within the network. The report cites that 'the main reason for not using the HWRS is people feeling they don't need to as other methods are sufficient for their needs'.

¹⁰ Veolia, 2016 HWRS Satisfaction Survey

When set in context of the low tonnage and low kg/visit, the survey reported that residents using the Forest Row and Wadhurst HWRSs were 'most likely to use sites 1-4 times a week' (compared to the wider network average of 1-3 times a month) suggesting that these sites are visited by a small pool of people depositing small amounts of waste at any one time. However, even though both of these sites are small, when service changes were proposed in 2013/14 to close both sites, a very strong response was received indicating how popular they are with residents.

Site Design – Split Level, Single-Level

The East Sussex County Council HWRS network consists of a mix of design and layout much of which is the result of older sites being situated on land that has limited available space and access issues that mean these cannot be developed to a standard expected of a modern new-build HWRS.

The IWMSC contract with Veolia has allowed new HWRS sites to be developed such as the examples at Crowborough, Maresfield and Hastings which are of the modern split level type meaning they offer residents much greater ease of access whilst also allowing them to be serviced more efficiently and safely.

However, on some of the older sites within the network, despite the best efforts of the contractor to maximise space, these suffer from issues such as difficult access and lack of space reducing the options for recycling material.

One of the most difficult sites in terms of site usage is Hailsham which, whilst it is a split level, is an older site operating within a relatively small footprint of 200m². Apart from making usage awkward for residents, it is also limited in terms of recycling options hence it has the poorest recycling rate of all sites in the network at just 43%.

HWRSs Network – Infrastructure Location

The HWRS network in East Sussex has evolved to meet changing needs over many years. HWRSs form one element of the strategic waste infrastructure that makes up the required facility provision for effective waste collection, transport and disposal. Waste Transfer Stations (WTSs) are an important part of this infrastructure allowing for the bulking of material for onward haulage elsewhere. It makes practical operational sense to co-locate, where possible, HWRSs alongside WTSs and in East Sussex. This has been done at Eastbourne, Hastings and Maresfield.

In collaboration with its contractor, Veolia, East Sussex County Council continue to consider if the network is capable of meeting residents and operational need in years to come in terms of geographical layout. Future need was the driver behind the creation of new sites at Crowborough, Hastings and Maresfield and the expected future strategic importance of the Hailsham HWRS is one of the drivers behind the investment business case for this site outlined in the 'HWRS Service Improvement Options'.

So, from a strategic perspective, some sites within the HWRS service are more operationally critical than others.

6 Strategic importance of individual sites.

Through a combination of an analysis of the performance metrics covered above and an understanding of the geographic layout of the network, it is possible to group East Sussex County Council's HWRS sites according to strategic importance – both in terms of meeting residents needs and also maintaining a operationally functioning network.

The table below lists those sites, taking into account an overall consideration of the performance metrics available that are considered to be of **critical importance** to the HWRS network.

HWRS	Key Site Characteristics
Hastings	<ul style="list-style-type: none"> • New site opened in 2012 • Co-located with a Waste Transfer Station hence operationally critical • East Sussex's busiest HWRS processing almost 14,000 tonnes per annum and over 336,000 visits per annum. • 2nd lowest Site Management Fee per tonne • Geographically important for residents in the East of the County. • Modern split level site
Eastbourne	<ul style="list-style-type: none"> • Co-located with a Waste Transfer Station hence operationally critical • 3rd busiest site, processing over 9,000 tonnes and over 195,000 visits per annum
Maresfield	<ul style="list-style-type: none"> • New site opened in 2009 • Modern split level site • Co-located with a Waste Transfer Station hence operationally critical • Geographically well placed for easy resident access.
Newhaven	<ul style="list-style-type: none"> • New site opened in 2011 • Modern split level site • Highest Customers Satisfaction Survey Score March 2016 – 96%¹¹ • Lowest Site Management Fee per visit • 2nd busiest site within the network, processing almost 10,000 tonnes and over 254,000 visits per annum

The table below lists those sites, taking into account an overall consideration of the performance metrics available are considered to be of **high importance** to the HWRS network.

HWRS	Key Site Characteristics
Crowborough	<ul style="list-style-type: none"> • Relatively new site (opened 2004) • Modern split level design • Joint second highest Recycling rate - 64% • Near to Maresfield Waste Transfer Station i.e. good part of the network
Heathfield	<ul style="list-style-type: none"> • Modern design split level site • Geographically important as this sites serves a relatively large area in the East of the County
Mountfield	<ul style="list-style-type: none"> • Geographically important as this site serves a relatively large area in the East of the County and meets the need of residents in this area having an HWRS within 20 minutes' drive.
Lewes	<ul style="list-style-type: none"> • Highest Recycling performance of all HWRS sites across East Sussex – 66% • 2nd lowest waste to landfill performance – 8% • Closure would put additional pressure on Newhaven HWRS
Hailsham	<ul style="list-style-type: none"> • Expected to experience the most local population growth and therefore will be increasingly strategically important. • Business case exists to improve site performance and deliver future savings (please see 'HWRS Service Improvement Options' section)

¹¹ Customers satisfied or very satisfied with site based upon a telephone survey undertaken in March 2016

The table below lists those sites, taking into account an overall consideration of the performance metrics available are considered to be of **lower** importance to the HWRS network

HWRS	Key Site Characteristics
Forest Row	<ul style="list-style-type: none"> • Lowest visitor numbers of all HWRS in the network • Large reuse shop • Site Management Fee per visit which is over double that of most of the other HWRS • Joint lowest visitors by hour • Older style site with the smallest footprint (118m2)¹²
Wadhurst	<ul style="list-style-type: none"> • 2nd lowest visitor numbers • Joint lowest visitors by hour open • 3rd highest waste to landfill figure • Older single-level site – 3rd smallest footprint (1890m2)
Seaford	<ul style="list-style-type: none"> • Lowest Customers Satisfaction Survey Score March 2016 – 77% • Clear alternative site – Newhaven – exists • Older style single-level site

7 HWRS Potential Service Changes

The previous sections have sought to evidence how East Sussex County Council delivers a successful HWRS network that not only meets its statutory obligations but which also exceeds recommended provision by some considerable margin.

Savings overview

The Waste service budget will reduce by £558k in 2018/19 and a further £162k the following year, which has led to the current review of the Household Waste Recycling Sites service. This section makes recommendations as to how the budget gap could be reduced by making changes to the HWRS Service but which still ensure a comprehensive service to residents is maintained.

HWRS closures – full and / or part time

Under the IWMSC, Council savings may be realised where there is a reduction in the contractor's net cash outflows as a result of East Sussex County Council changing service requirements.

As part of the service review, consideration is being given to reduced opening days or fully closing HWRS.

Previous experience has shown that reducing opening days does not yield proportional savings due to the fixed nature of many of the costs, and additional servicing and security cost on the closed days.

Fully closing a site should yield a saving nearer to the full operating costs, although there could be additional operational costs at other nearby sites due to the diversion of waste. For example, closure of one HWRS could mean additional staffing and other operating costs at another to manage additional waste and visitors.

Commercial discussions have taken place with Veolia regarding the potential closure of the three sites of lower strategic importance. During discussions with Veolia it was identified that the closure of Seaford would require significant transfer of resources and this would result in a net cost to East

¹² Amended from previous version of document that incorrectly listed Forest Row site as 200m2.

Sussex rather than a saving. Seaford HWRS will not be considered for closure as a result, at this time.

Charging for HWRS Access (not allowed at this time)

In April 2015, local authorities were prohibited from charging residents for entering or exiting household waste recycling centres. Nonetheless, some authorities are looking to assess (via lobbying central government) if charging for access could be possible with the view that a small charge for entry can help to protect service provision. ESCC are working with Hampshire County Council to assist in lobbying central government on this issue.

Charging for non-household waste

Charging for non-household waste streams at HWRSs is well established across England and Wales and has been recently introduced at a number of neighbouring authorities to East Sussex, including Surrey County Council in September 2016 and Hampshire County Council a month later. West Sussex County Council also implemented a scheme in October 2016 but has subsequently suspended this whilst they await some further guidance from Defra (see below).

A recent WRAP (The Waste and Resources Action Programme) Survey of 55 NAWDO (National Association of Waste Disposal Officers) Authority members covering 421 HWRSs showed that 37% either have Chargeable Waste Schemes in place or are about to implement them. Another 14% currently have Chargeable Waste Schemes under consideration.

There has been significant recent growth in Chargeable Waste Schemes being implemented with seven more Authorities implementing them in 2016.

As described above, in April 2015 legislation came into effect, which prohibits authorities from charging fees to enter or exit HWRSs, or for the deposit of household waste. However, internal legal advice confirms that this does not prevent the Council from charging residents to deposit waste which is not classified as 'household waste' at HWRSs. The Controlled Waste (England and Wales) Regulations 2012¹³ Schedule 1, subsection 3, item 9 provides that "notwithstanding the place where it is produced... waste from construction or demolition works, including preparatory works must be treated for the purposes of Part 2 of the EPA ... as industrial waste". No exception was made for some types of waste commonly associated with renovations such as plasterboard, hardcore etc. These wastes are not therefore, using the interpretation of the Controlled Waste Regulations, household waste.

In April 2017, the Governments 'Litter Strategy for England'¹⁴ included a section on HWRS and asserted a view that 'DIY waste is classed as household waste if it results from work a householder would normally carry out.' However, as seen from above this is at odds with the legislation and DIY waste is not defined by law. Further guidance from DEFRA was due before the end of 2017 but is now expected early 2018.

¹³ <http://www.legislation.gov.uk/ukxi/2012/811/contents/made>

¹⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/630999/litter-strategy-for-england-2017-v2.pdf

8 Key Service Conclusions

This report has framed East Sussex County Council's HWRS service provision within the context of difficult choices and acute budget pressures. By assessing need alongside our HWRS network provision we can see 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. We can also see that **98.4%** of residents are currently able to reach a site within 20 minutes. Geographically, in the south-west and north-west of the network, there appears to be some overcapacity of HWRS provision. As such, this report makes the following key conclusions.

Conclusion 1

Chargeable Waste Schemes for non-household waste at HWRSs are well established across England and Wales. Legal advice supports East Sussex County Council's ability to introduce these disposal charges and in doing so 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.

Conclusion 2

Analysing the Performance Data available including the number and frequency of visits, tonnage deposited etc., Forest Row HWRS would appear to have usage of a level that could be absorbed by alternative HWRSs within the network and deliver an annual cost saving.

Conclusion 3

Analysing the Performance Data available including the number and frequency of visits, tonnage deposited etc., Wadhurst HWRS would appear to have usage of a level that could be absorbed by alternative HWRSs within the network and deliver an annual cost saving.

It is important to note that these conclusions have been formed in the context of East Sussex County Council still being able to provide a HWRSs service that would continue to meet the needs of residents whilst also allowing us to comfortably meet statutory and recommended minimum provision.

The 'HWRS Performance and Usage' section sought to provide a rationale to identify HWRS network need and, from this, the informal hierarchy ranking illustrated those sites that were critical to the network through to those sites that could be seen as providing excess capacity.

As previously cited, the HWRS Service provided by East Sussex County Council is an extremely popular one with the 12 sites receiving approximately 1.6 million visits by residents each year. East Sussex County Council recognises that any changes made will have an impact upon some residents. For any conclusions within this report, consideration is made to minimise any possible reduction in service levels and ensure that the provision still meets the needs of residents. Appendices 1-12 provide an analysis of the impact of these changes for both residents' service experience and also how the network will continue to function effectively and efficiently.

Appendix 1 HWRS Service Improvement Options

Section 5 around HWRS performance and usage covered site satisfaction and made the point that this is something East Sussex County Council work hard to maintain and improve. As such, this section of the report covers aspects where East Sussex County Council proposes options that aim to provide a better service for residents across the network.

Hailsham HWRS improvement

A proposal has been developed to extend Hailsham HWRS to the west by approximately seven metres to create additional concrete hardstanding space for additional containers. This will increase the number of containers on site, which will allow greater separation of materials for recycling and recovery. **This is expected to generate a saving of approximately £38,000pa through increased diversion from landfill.** The proposed changes will also improve the customer experience and increase the capacity of the site to accommodate future housing growth described in more detail below.

Hailsham HWRS performs poorly in term of percentage of waste recycled compared to other East Sussex HWRS with only 43% of material recycled (2016/17) compared with 66% at Lewes HWRS which is the highest performing site in terms of material recycled.

Hailsham also has the highest amount of material going to landfill at 48% which is in stark contrast to highest performer here – Hastings – that sends just 7% to landfill.

This proposal aims to increase performance, improve residents' satisfaction and provide long-term additional capacity to meet the requirements of the local population in the years to come.

Business case

It is anticipated that the extension will provide space for an additional four 40yd containers. These could be used for a variety of different materials and it is envisaged that they will be used for cardboard, MDF, black bag and bulky waste.

Along with offering residents more opportunities to recycle, the extra containers will increase the overall capacity of the site and enable it to cope better with increased demand arising from the new housing developments in the Hailsham, Hellingly and to a lesser extent – Polegate - areas. This area is set to have the highest concentration of new housing development in the county and 10,000 new households are projected by 2037 in the emerging Wealden Local Plan. Since the start of the IWMS in 2003, the local population has grown by 12% to around 25,000 residents in 2014. Waste tonnages at Hailsham HWRS have also steadily increased in recent years.

The site is currently very small with only one small area for the public to park their cars and access the containers. Under this proposal the site will be expanded in size and an additional area for recycling containers could be created on the lower level. This will also help to create more space on the upper level by moving some of the containers that can cause a bottleneck. Overall the site layout will be improved with more space for pedestrians and cars.

The HWRS Satisfaction Survey in 2016 found that fewer users were positive about Hailsham HWRS than any other site other than Seaford HWRS. Net satisfaction with the range of materials that can be recycled at Hailsham is 49% compared with 59% on average across all HWRSs. The feeling of safety is 7% lower than the average so the additional space offered by the extension may help with making pedestrians feel better separated from moving vehicles.

The proposed extension to Hailsham HWRS offers a quick payback on the investment and an on-going saving, the potential to improve customer satisfaction and greater capacity to accommodate population growth in the area.

Funding availability

As of 30th January 2018, £96,069 is held by the planning authority in s106 contributions towards waste infrastructure. This funding is restricted to increasing the capacity of waste infrastructure in the area. This consists of £82,966 allocated for the Hailsham area, and a further £13,104 for neighbouring areas in the catchment area for Hailsham HWRS (Stone Cross, Westham and Polegate).¹⁵ A further £68,839 of s106 has been agreed for Hailsham, but the contributions are yet to be collected and so there is no certainty about when this money will be available.

The extension is estimated to cost in the region of £131,000. This is based on the original estimate of £100,000 by a contractor in 2014, uplifted by 10% inflation and 10% contingency (total £121,000). The additional tree protection works are estimated at £2,500 for consultancy plus £7,500 for works. Therefore, the current budget shortfall is estimated at £34,931 but this would potentially be covered by the previously mentioned £68,839 of s106 from WDC. Whilst this £68,839 S106 is not guaranteed as it relies upon planned housing development actually going ahead, although this is a risk, even if we had to cover the £34,931 shortfall, it is on an invest to save basis as the HWRS development could bring £38k per year disposal savings, so could pay for itself in a little under 1 year.

Other HWRS Service Improvement Options

Opening Hours (savings to be confirmed)

Most sites are open at the same times every day. There are a few local exceptions where opening times and days can differ.

Examples include Eastbourne's HWRS that closes at 12 noon at weekends, Crowborough HWRS that closes at 1pm at weekends and Hailsham HWRS that also closes at 1pm at weekends. Weekends are the busiest time for the service and therefore restricted hours here cause inconvenience to service users.

Much of these inconsistencies arise from historical Planning and Permitting restrictions which has created the current pattern of HWRS network opening hours.

This review recommends that East Sussex County Council should work with Veolia, the regulator (Environment Agency) and internal Planning Departments to review where there are opportunities to operate site opening times that meet the needs of users.

This could mean opening later and closing early to fit with low demand, seasonal opening and investigating opening for longer where the demand exists.

Trade Waste – illegal use of HWRSs (savings to be confirmed)

The abuse of HWRSs by traders seeking to illegally deposit their waste is an issue that makes sites more difficult to manage often creating a tense atmosphere and, as a consequence, this has a detrimental effect on other site users and staff and hinders recycling efforts.¹⁶ There is also a significant cost associated with disposal of this illegally deposited waste material. This review recommends that we work with Veolia to understand the extent of any illegal trade waste abuses and

¹⁵ Figures obtained from ESCC Strategic Economic Infrastructure 2/10/17

¹⁶ Wrap HWRC Guide 2016

http://www.wrap.org.uk/sites/files/wrap/INH0449_HWRC_Guidance_2015_7%20FINAL.pdf

review the operational enforcement of illegal access by traders to not only deter them from attempting to access the site in the first instance but also ultimately in order to reduce the cost incurred by disposing of their waste. This will involve looking at how we deter waste both at the site itself but also through our communications channels to reduce the amount of unauthorised access attempts.

Trade Waste Acceptance (income to be confirmed)

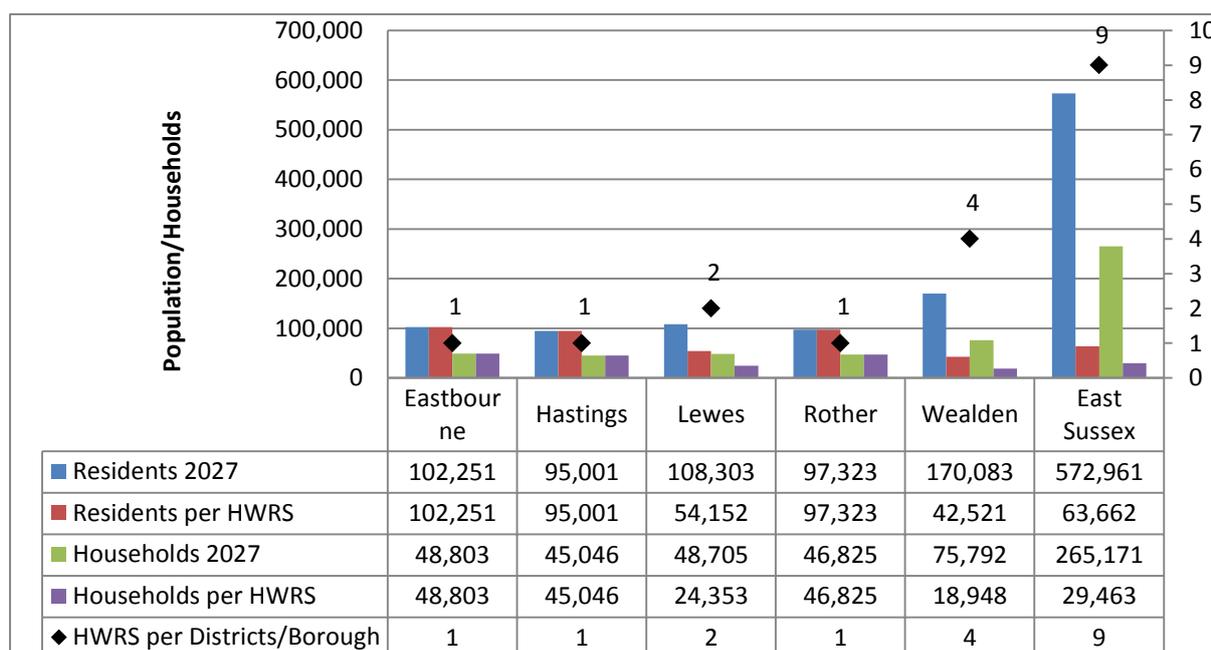
East Sussex County Council has no statutory duty to accept trade waste at any of the HWRSs and Veolia's HWRS Waste Permits/Licenses do not currently allow trade waste to be deposited. As such, East Sussex County Council does not currently offer facilities for traders to legitimately deliver their business waste/recycling for a charge to any of the contract waste facilities (HWRS or WTS). With the right infrastructure/systems in place it could, in theory, be possible to accept waste from small businesses creating an opportunity to generate revenue and provide a convenient disposal option for businesses.

The Maresfield, Hastings, Eastbourne and Hove sites all have weighbridges (as part of their Waste Transfer Stations) allowing commercial waste to be weighed. A trade service may be attractive to small businesses. This review recommends that East Sussex County Council should engage with Veolia to revisit this proposal. As such, East Sussex County Council have asked Veolia to consider what may be feasible as part of the specification for Chargeable Trade Waste.

Appendix 2 Benchmarking HWRS network provision

The East Sussex HWRS network is designed to ensure that there is a service provided that meets the needs of residents whilst also maintaining our statutory responsibilities and obligations.

If the sites of lower strategic importance (Forest Row, Wadhurst, and Seaford) were to close and taking into account expected population growth, the graph below shows that the remaining nine sites would still significantly provide a service in excess of the NACAS¹⁷ recommendation of offering at least one site per 143,750 residents. East Sussex would retain one HWRS per 64,000 residents which, even given 10 years expected population growth by 2027, would comfortably be within recommended provision.



¹⁷ The 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

Appendix 3 Accessibility study

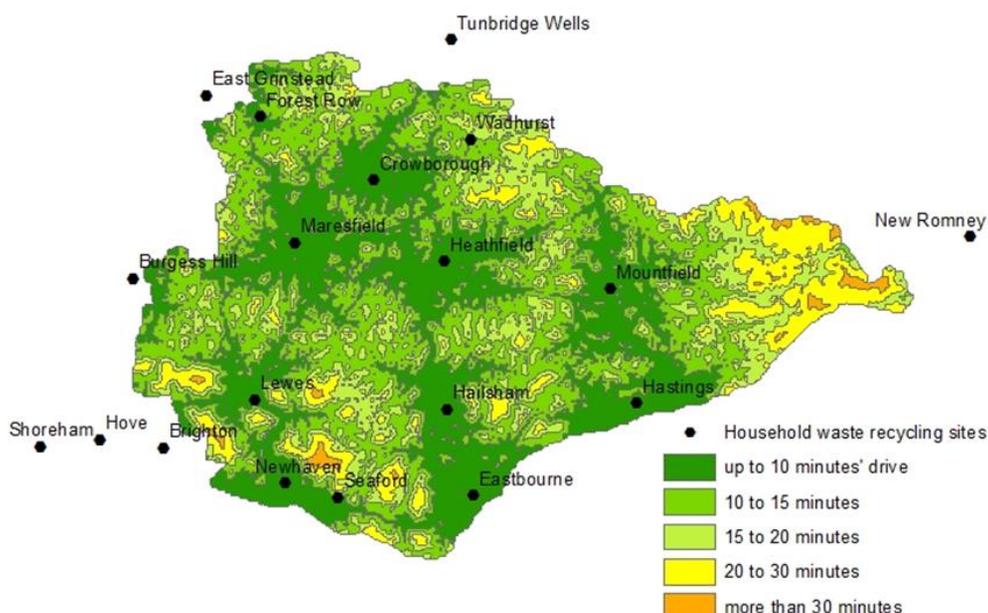
Where any site closures are proposed, consideration needs to be given to the possible movement of waste – both in terms of residents making alternative arrangements and also tonnages of waste displaced from the sites that are proposed to close.

The TRACC model indicates that 98.4% of the population of East Sussex can currently access any Household Waste and Recycling site (HWRS) within 20 minutes, including sites operated by other local authorities. TRACC models theoretical journey times using the road network assuming fixed speeds. There are currently 8,633 residents out of a total 526,671 (1.6%) who cannot access any HWRS within the recommended 20 minute threshold.

Sites identified as having lower strategic importance were modelled. Closing the Seaford site would have the least impact on residents' ability to access a HWRS, with 0.02% of dwellings (less than 120 residents) losing access to a site within 20 minutes. Closing Forest Row would affect 0.04% of dwellings (less than 200 residents), but the greatest impact is seen if Wadhurst is closed, with 0.1% of dwellings (less than 540 residents) losing access within 20 minutes. If all three sites are closed, 850 people or an additional 0.16% of the population would lose access within 20 minutes.

Time threshold	Number of people with access at present	% of population with access	% of population with access if all 3 sites closed
20 mins	518,040 ¹⁸	98.4	98.2
Total population	526,670 ¹⁹		

Accessibility contour for HWRS if all sites included (including those operated by other LAs) and all three sites closed (Forest Row, Seaford, and Wadhurst)



¹⁸ Figure updated from previous version that showed 518,038 residents (-2)

¹⁹ Figure updated from previous version that showed 526,671 residents (+1)

Full details of the study and its methodology are included at Appendix 10

Appendix 4 Traffic Movement – effect of specific site closures

The table below shows, for sites of lower strategic importance, the annualised visitor figures using traffic data collected from the sites.

HWRS Location	Annualised Visitor Number – traffic logger data
Forest Row	40,153
Wadhurst	44,964
Seaford	83,923

If these sites were to close it is reasonable to expect that residents will still wish to visit a HWRS in the remaining network. For some residents, they may change their habits such as accessing a kerbside Garden waste collection service or consolidating their visits to a HWRS, but many will seek to use the next site closest to them.

For Wadhurst and Forest Row, their geographical position means that any changes to residents HWRS usage patterns are likely to be relatively disparate and they will likely have more than one alternative HWRS they consider to be their next preference. East Sussex County Council recognise that, as waste in residents eyes is ‘borderless’, the next site considered to be preferential could well be that of a neighbouring authority. We encourage East Sussex residents to use sites within our own network and base provision on this assumption. However, East Sussex County Council maintains a pragmatic view of cross-boundary movement of waste and accepts that whilst some of its residents may use a HWRS outside of the County, the opposite holds true with external waste coming in from other authorities. East Sussex County Council is always mindful and seek engagement with neighbouring authorities where appropriate.

As any closure of Wadhurst and / or Forest Row HWRS would result in a fragmented pattern of alternative usage and subsequent traffic flow, the road network would not be adversely affected.

A possible closure of Seaford HWRS however required a more detailed traffic analysis of potential effect on the road network. Due to its geographical location, it is reasonable to assume that any closure of this site would likely result in the vast majority of this sites waste moving to Newhaven HWRS via the A259 which is a journey of almost exactly five miles.

In assessing the viability of a site closure to ensure the continued suitability of HWRS network provision, regard is given to vehicle trips made as residents make journeys to alternative HWRSs. In the case of a full closure of Seaford HWRS, traffic analysis carried out by East Sussex County Council’s Strategic Economic Infrastructure Team suggests, that under a worst case scenario, the road network would see an average increase of 2.9% which equates, on average, to one additional car every couple of minutes. The biggest percentage increase in traffic relative to current traffic levels is in the early morning opening hours of the Newhaven HWRS (8:00am) but this is because the traffic levels are relatively low compared to the rest of the day and is still well within the capacity of the road.

This ‘worst case scenario’ assumes that all journeys made as alternatives to visits to Seaford HWRS would go to Newhaven HWRS along the A259.

In terms of site access and vehicle capacity, Newhaven has a large internal circulation lane (approximately 200m to the parking area) and also a right hand turn lane on the A26 which can accommodate six or seven additional cars. Given this vehicle capacity and analysis of possible

additional vehicle movement, Newhaven HWRS and local road network would be able to cope with a full closure of Seaford HWRS. Appendix 11 shows the traffic data used for this study.

Appendix 5 Habitats Regulations Assessment Screening Report

The Forest Row HWRS is adjacent to Ashdown Forest, part of the European Natura 2000 network²⁰ and a site with European statutory designations as a Special Area of Conservation (SAC) and a Special Protection Area (SPA). If the Forest Row site were to close, the intensification of use of other HWRS in the locality (identified as Maresfield or Crowborough), when people take their waste to a nearby alternative HWRS, could have an impact on traffic movements across Ashdown Forest,

A similar study was carried out as part of the 2013 review and concluded that taking the worst-case scenario of a predicted additional 486 to 512 per day car journeys across the Forest, the average daily traffic flow up until 2025 was not likely to increase by 1,000 vehicles or more. Therefore it was not considered that there would be a likely significant effect on the designated site.

East Sussex County Council consulted Natural England on this screening assessment at the time and they supported the conclusion.

Assuming the consultation goes ahead and if Cabinet decided to progress site closure, we will revisit and refresh this study.

Appendix 6 HWRS Service Change Considerations: Displaced Waste Tonnage and Operational Capacity

As previously mentioned, whilst a visit to a HWRS requires (in most cases) a vehicle journey, it also results, normally, in a deposit of waste. Closing a site will mean that this waste will need to be accommodated elsewhere. Whilst some residents will form new mitigating behaviours such as using kerbside garden waste collection schemes, home composting etc. it is reasonable to expect that the majority of the volume of waste being deposited at any sites suggested for closure will need to be accommodated elsewhere. **Sites of lower strategic importance were modelled to show impacts on displaced tonnage operational capacity.**

The table below shows the annual tonnage of waste at Forest Row, Wadhurst and Seaford HWRS

Site	Annual tonnage 16-17	Nearest East Sussex County Council alternative site tonnage	Total Combined
Forest Row	1,279t	Maresfield - 5,536t Crowborough – 4,325t	6,815t (Maresfield) or 5,604t (Crowborough)
Seaford	2,996t	Newhaven – 9,814t	12,810t
Wadhurst	1,882t	Crowborough – 4,325t	6,207t

²⁰ http://ec.europa.eu/environment/nature/natura2000/index_en.htm

The above table shows that if each site's annual tonnage all went to its nearest alternative, the highest increased tonnage would result in Newhaven HWRS accepting an extra 2,996t resulting in a total annual tonnage of 12,810t. This would still be well below the NACAS recommendation of maximum throughput for any HWRS site of 17,250 tonnes per annum²¹.

Displaced tonnage may create on-site operational pressures which would be managed by our contractor Veolia.

Displaced waste from Seaford, assuming it all moved to Newhaven results in a modelled uplift to approximately 12,800t per annum. The Environment Agency has put in place a 75,000 waste tonne limit on the site permit but Veolia have operational concerns about handling the extra tonnage. East Sussex County Council will need to work with Veolia to consider any adaptations necessary at the site to deal with this additional waste.

The other HWRS likely to be impacted in terms of increased waste is Crowborough HWRS. However, even if 100% of Wadhurst's tonnage and 50% of Forest Row's (worst case) went to Crowborough, this would still only total 6,847t (based upon 2016/17 figures) which is below the Environment Agencies' permitted site license of 7,000t per annum.

It is worth noting, that if a scheme for Chargeable Waste is introduced, tonnages for non-household waste types being deposited at HWRSs are likely to decline in the region of 70-80%. This reduces the displaced tonnage pressures following any site closures as well as setting a lower base tonnage at the sites that will be diverted to.

It is also worth noting that tonnage across the HWRS network is gradually declining. One significant element of this has been the introduction of kerbside Garden Waste Collections by the District & Boroughs which has resulted in less green waste being received at HWRSs.

Appendix 7 Fly-tipping – concerns and preventative measures

Proposing changes to our HWRS services will raise concerns about the potential for increased fly-tipping, however there is little evidence that HWRS service changes cause increases in fly tipping.

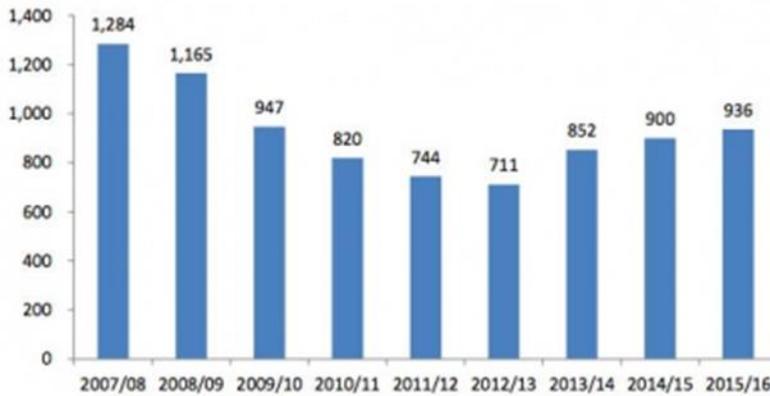
Statutory enforcement powers regarding fly tipping on public or private land lie with the district and borough councils and the Environment Agency. However, we do have a duty to dispose of fly-tipped waste collected by the district and borough councils, and to cover the disposal cost. And although fly-tipping on private land is not the responsibility of the local authorities, it remains a concern.

The national picture

Following years of steady decline, there was a significant increase in reported cases of fly-tipping on public land in England in 2013/14. The Government statistics show that local authorities reported around 852,000 cases of fly-tipping in England in 2013/14 and that the Environment Agency dealt with a further 137 illegal waste dumping incidents. This represented an increase of 20% since 2012/13. This trend is continuing.²²

²¹ The 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

²² 'Fly-tipping - the illegal dumping of waste', 2017
<http://researchbriefings.files.parliament.uk/documents/SN05672/SN05672.pdf>



Number of fly-tipping incidents in England, 2007/08 to 2015/16 (in thousands)

Graph: Defra

²³ See endnote

It has not been evidenced that policies introduced at HWRSS are the main cause of the increase in fly-tipping. The way fly-tipping incidents are recorded by district/ borough councils varies and has changed over time which may at least partly account for the change.

DEFRA has also indicated that this rise could be due to more local authorities introducing new technologies, such as online reporting and electronic apps, as well more training for staff for dealing with fly-tipping cases, rather than because of an actual increase in fly-tipping.²³

As the cost of waste disposal increases, the increase in fly-tips could be affected by trade waste operators avoiding the cost of proper waste disposal.

The Government's litter strategy states that businesses caught fly-tipping have cited the reason for doing so as a lack of funds to pay legitimate waste disposal charges²⁴. It is important to consider the nature of the waste and the size of the fly-tips to help determine whether they come from a trade or household source.

The local picture

The data available suggests that fly-tipping in both East Sussex County Council has not closely mirrored the national trend. In East Sussex County Council, whilst the number of incidents reported per quarter decreased from April 2013 to January 2017 (Local Authority reports to Waste Data Flow [WDF]*), an increase in annual fly-tip tonnages recorded in 2013/14 has been followed by a larger decrease by 2016/2017 (weighbridge data from Veolia*).

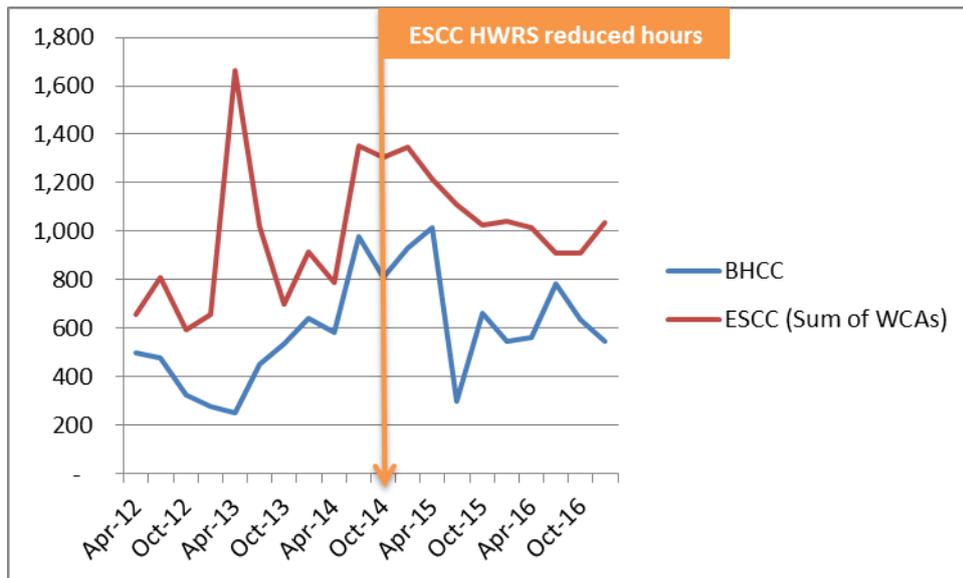
The graph below shows the number of fly-tipping incidents* reported by the local authorities to WDF in East Sussex and Brighton & Hove, on a quarterly basis, for the last five years

²³ 'Fly-tipping continues to rise as councils spend £50m clearing dumps' by Edward Perchard, Resource, March 2017

<http://resource.co/article/fly-tipping-continues-rise-councils-spend-50m-clearing-dumps-11707>

²⁴ HM Government, Litter Strategy for England, April 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/630999/litter-strategy-for-england-2017-v2.pdf



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

Could fly-tipping increase as a result of HWRS service changes?

There is no significant evidence to link policies, such as charging for non-household waste at HWRSs, with increased fly-tipping. In a NAWDO (National Association of Waste Disposal Officers) survey of local authorities in June 2017, 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.

Neighbouring authorities 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 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 HWRS changes.

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 Court²⁵. It is considered that the severity of the custodial sentences and fines is an appropriate deterrent to deter most people from committing what is now a significant criminal offence.

In 2015/16 in East Sussex, the number of fly-tips reported to WDF which were bigger than a car-boot load accounted for 64% of the total, suggesting that the majority of fly-tips may not originate from residents²⁶.

²⁵ Clean Neighbourhoods & Environment Act 2005
http://www.legislation.gov.uk/ukpga/2005/16/pdfs/ukpga_20050016_en.pdf

²⁶ "ENV24 Fly-tipping incidents and actions taken", published by the Department of Environment, Food and Rural Affairs. Fly-tipping statistics are taken from the WasteDataFlow database.

In East Sussex, changes to the HWRS opening hours for Wadhurst, Forest Row and Seaford were implemented on 6th October 2014. In terms of separately recorded fly-tip tonnage (from Veolia weighbridge data) in the relevant districts, there was an increase in Wealden which began five months before the changes in opening hours, and then started declining from October 2014 when the opening hours reduced. Lewes district's annual fly-tip tonnage has seen a year-on-year decline since 2013/14.

Both LDC and WDC fly-tipped waste last year (2016/17) had reduced by 47% of the 2012/13 tonnage - prior to the changes in opening hours. As some estimation of the split of loads is involved, we cannot be certain how accurate the data is. However, in terms of the WDF data for East Sussex since October 2014, there has also been a decreasing trend in the quarterly number of fly-tipping incidents reported and the quarterly tonnages (see above graph).

Future prevention plans

East Sussex County Council will take a pro-active role with its District & Boroughs and neighbouring authorities in order to work together to minimise the incidences of fly tipping across the County. Suggestions for potential mitigation measures to prevent fly-tipping could include:

- Work with the Borough and District councils to develop a fly-tipping prevention strategy and action plan during 2018.
- Engage with The National Fly-tipping Prevention Group (NFTPG) to ensure national best practice is incorporated locally into any future initiatives
- Continue to monitor the HWRSs through CCTV and Automatic Number Plate Recognition (ANPR) and carry out inspections to assess the impact of HWRS service changes.
- Work with Veolia to review the potential for allowing small businesses access to the larger HWRSs at proportionate cost.
- Signpost private land owners and the Farmers Union to support and advice in preventing and evidencing fly-tipping.
- Educate residents and businesses about their 'duty of care' responsibilities when disposing of waste.
- Work with Districts and Boroughs to provide clear direction and encouragement for reporting incidents of fly-tipping.
- Work closely with the District and Borough Councils, and other agencies such as Police, the Environment Agency, Trading Standards and representatives of the rural community, to ensure any incidents of fly-tipping are promptly reported, cleared and investigated fully with enforcement action taken where possible.
- Support Borough and District councils with enforcement against fly-tipping through the sharing of legal powers.
- Work closely with the District and Borough Councils to progress understanding of the current situation by monitoring fly-tipping reports/records and enforcement action.
- Contribute to an anti fly-tipping campaign to highlight the impacts and consequences such as the successful one run by Suffolk County Council, 'Tip-Off: Stop Fly-tipping in Suffolk'.
- Focus on Ashdown Forest, a highly protected area.

Appendix 8: HWRS Performance Table

Performance Element	Crowborough	Eastbourne	Forest Row	Hailsham	Hastings	Heathfield	Lewes	Maresfield	Mountfield	Newhaven	Seaford	Wadhurst
Tonnage 2016/17	4,325	9,261	1,279	4,902	13,812	4,293	3,623	5,536	4,732	9,814	2,966	1,882
Chargeable waste types 2016/17	705	1,602	168	827	1,970	677	430	831	698	1,788	385	309
Type of site (single/split level)	Split	Single	Single	Split	Split	Split	Single	Split	Single	Split	Single	Single
Age (new/redeveloped/old)	New	Old	Old	Old	New	Old	Old	New	Old	New	Old	Old
Stand alone or co-located	stand alone	co-located with WTS	stand alone	stand alone	co-located with WTS	stand alone	stand alone	co-located with WTS	stand alone	stand alone	stand alone	stand alone
Site area (sq m)	2,760	9,230	1,180	2,000	24,905	3,780	2,840	15,848	1,650	5,660	2,560	1,890
Opening hours	Limited - esp. weekends	Limited - esp. weekends	Limited - 3 days a week	Limited - esp. weekends	Standard - good hours	Standard - good hours	Standard - good hours	Standard - good hours	Standard - good hours	Standard - good hours	Limited - 3 days a week	Limited - 3 days a week
Full range of materials recycled or limited	Full	Full	Full	Full	Medium - no bric-a-brac or furniture	Full	Full	Full	Full	Full	Full	Full
Recycling performance 2016/17	64%	55%	58%	43%	54%	58%	66%	63%	53%	61%	64%	59%
Dry recycling performance as a % of waste excluding green 2016/17	54%	49%	48%	37%	44%	49%	54%	54%	44%	50%	48%	51%
Reuse performance 2016/17	16%	19%	16%	17%	13%	17%	15%	17%	16%	18%	14%	18%
Landfill performance 2016/17	10%	10%	36%	48%	7%	18%	8%	11%	16%	14%	10%	27%
Recovery performance 2016/17	27%	35%	6%	9%	40%	24%	27%	27%	32%	25%	27%	14%
Visitor numbers 01/12/2016 to 31/08/2017	88,925	146,490	30,115	70,508	252,358	82,440	79,014	114,438	76,703	190,740	62,942	33,723

Appendix 8: HWRS Performance Table (cont.)

Performance Element	Crowborough	Eastbourne	Forest Row	Hailsham	Hastings	Heathfield	Lewes	Maresfield	Mountfield	Newhaven	Seaford	Wadhurst
Visitor numbers annualised	118,567	195,320	40,153	94,011	336,477	109,920	105,352	152,584	102,271	254,320	83,923	44,964
Kg/visit 01/12/2016 to 31/08/2017	35	46	31	52	41	38	34	36	45	37	33	38
Av. Visits/hr open	47	86	31	35	107	34	36	49	33	82	65	31
Status of land (leasehold/free hold)	Freehold	Freehold	Freehold	Leasehold	Leasehold	Freehold	Leasehold	Freehold	Freehold	Freehold	Leasehold	Freehold
Indicative value of freehold land if vacated (2017/18)	£650,000-£750,000	£1million plus	£175,000-£200,000	N/A	N/A	£250,000-£300,000	N/A	Up to £750,000	£50,000-£100,000	£500,000-£600,000	N/A	£150,000-£200,000
Annual cost of leasehold (2017/18)	N/A	N/A	N/A	£ 12,140	N/A	N/A	£ 20,000	N/A	N/A	N/A	£ 22,500	N/A
Penalty for ending lease	N/A	N/A	N/A	No termination clause - liable for remaining term rent to 30/04/2079	No termination clause - liable for remaining term rent to 31/03/2058	N/A	No termination clause - liable for remaining term rent to 15/04/2029	N/A	N/A	N/A	No termination clause - liable for remaining term rent to 14/05/2028	N/A
Customer Satisfaction with site March 2016	85%	87%	87%	82%	85%	92%	94%	95%	93%	96%	77%	87%
Customer Complaints per site 2016/17	1	2	0	1	2	1	1	0	0	3	1	2
Customer Compliments per site 2016/17	20	17	8	5	4	37	23	6	9	7	15	3

Appendix 9 Modelling accessibility impacts of closing Household Waste and Recycling Sites in East Sussex

November 2017

If Forest Row, Seaford and Wadhurst Household Waste and Recycling sites were to close, 850 people or 0.16% of the county's population would no longer be able to access a household waste site within a 20 minute drive time.

Part 1: Summary of impact of closure of specific Household Waste and Recycling sites

Table 1.1: Summary results – access to any Household Waste and Recycling sites – including external sites

Time threshold	Number of people with access at present	% of population with access	% of population with access if all 3 sites closed
20 mins	518,040	98.4	98.2
<i>Total population</i>	<i>526,670</i>		

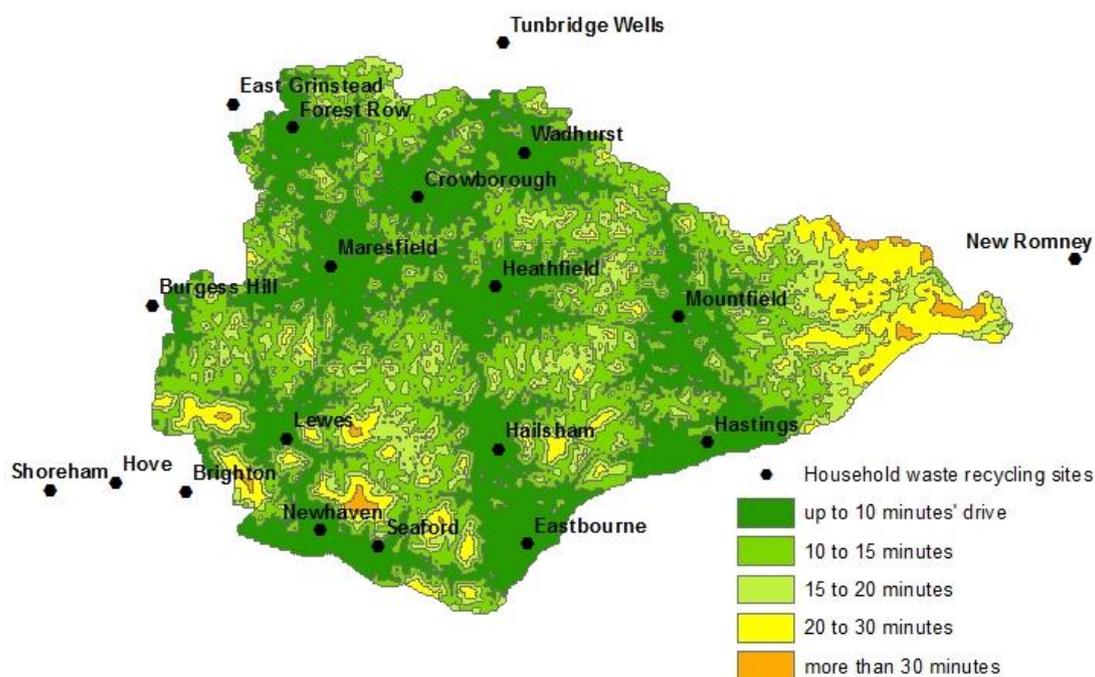
The TRACC model indicates that 98.4% of the population of East Sussex can currently access any Household Waste and Recycling site (HWRS) within 20 minutes, including sites operated by other local authorities. TRACC models theoretical journey times using the road network assuming fixed speeds depending on road type.

There are currently 8,630 residents who cannot access any HWRS within the recommended 20 minute threshold.

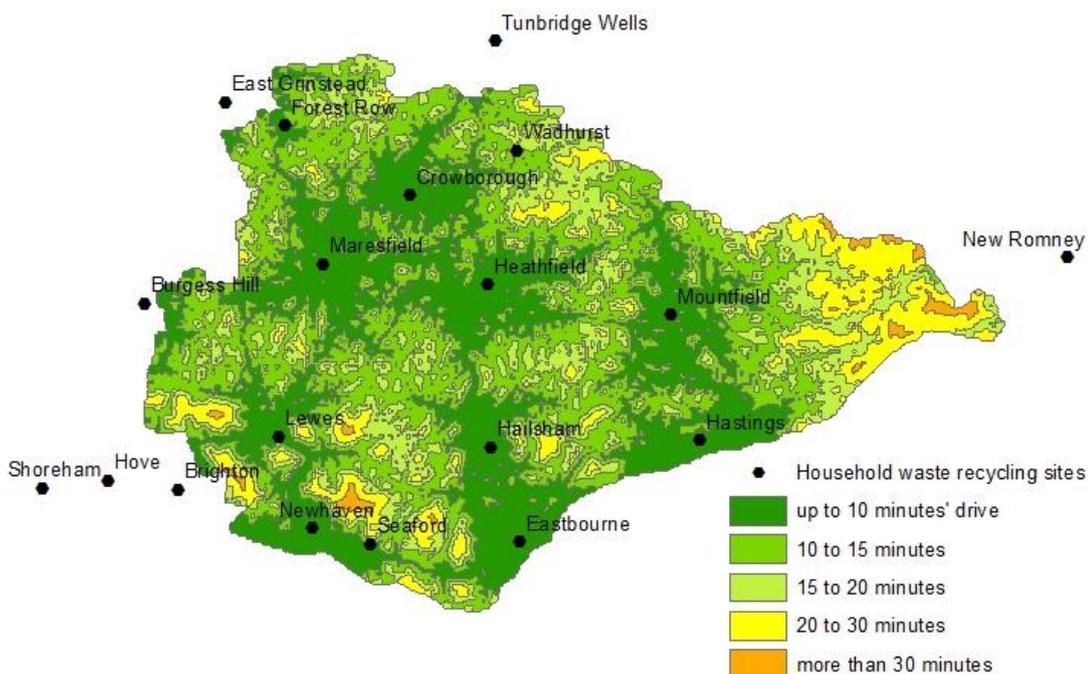
Part 2: Current accessibility contour maps showing times taken to access to waste sites

Part 2 shows contour maps generated using the TRACC model, showing journey times to Household Waste and Recycling sites (HWRS). The greenest areas indicate the shortest journey times (less than 10 minutes), with orange areas indicating the longest journey times (20+ minutes). Six maps are shown giving current journey times and journey times if all three HWRS sites are closed, for both all available HWRS, those located in and run by East Sussex County Council and Brighton and Hove City Council, and those run by ESCC alone..

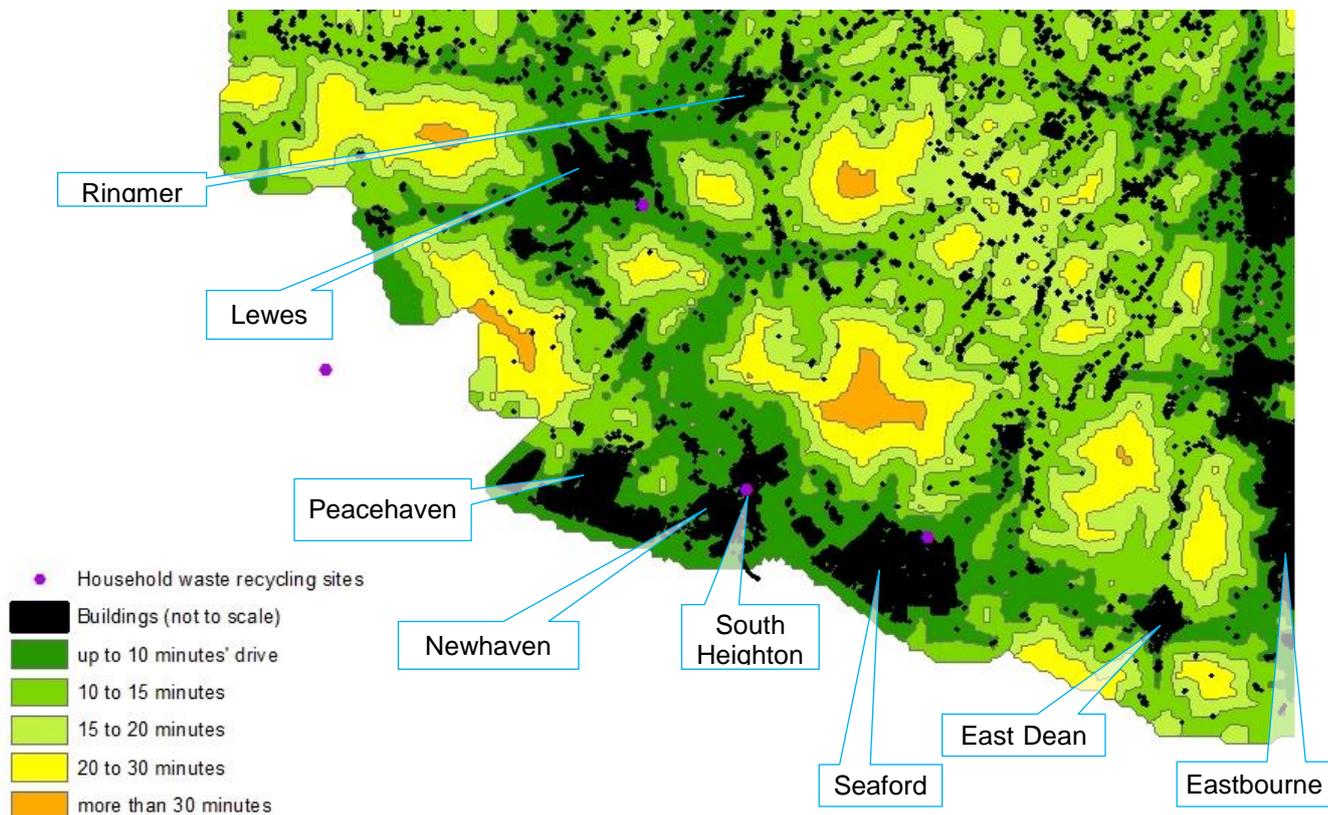
Map 2.1: Current accessibility contour - journey times to a Household Waste and Recycling site (HWRS) if all HWRS are available to East Sussex residents, including those operated by other local authorities (LAs)



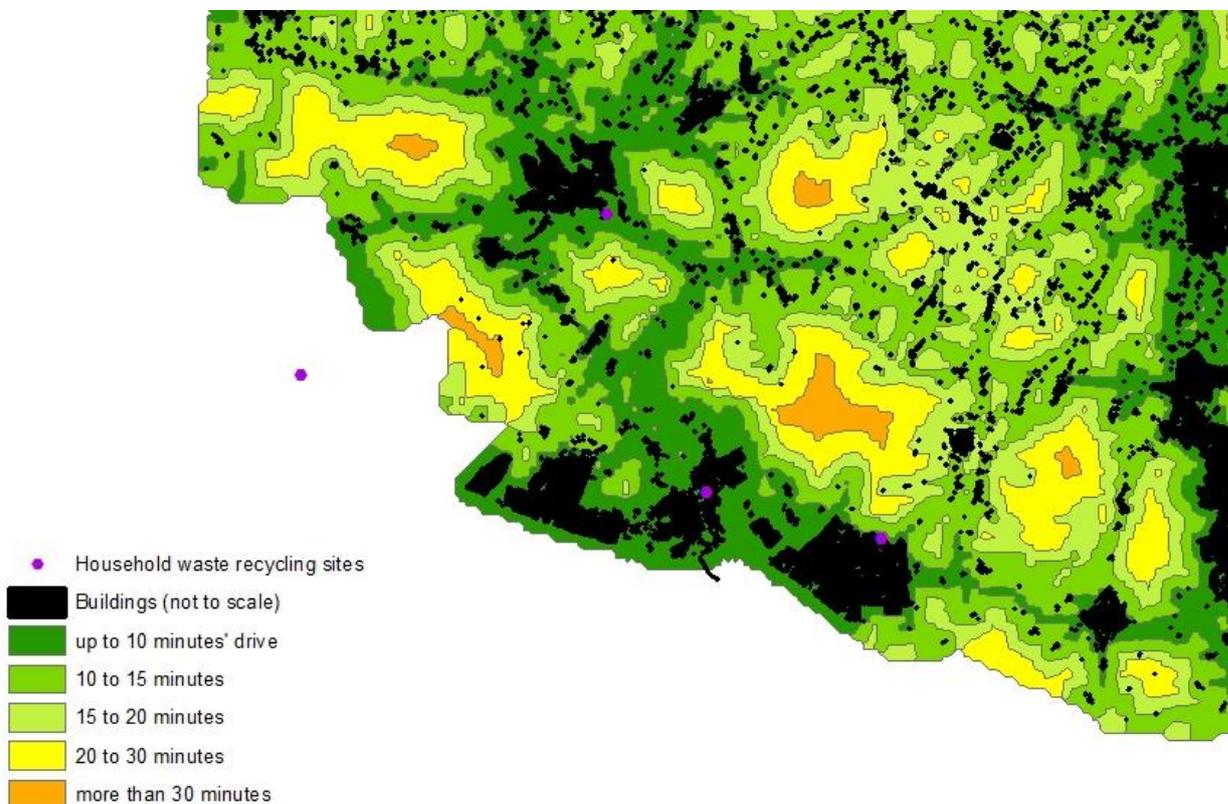
Map 2.2: Accessibility contour for HWRS if all sites included (including those operated by other LAs) and all three sites closed (Forest Row, Seaford, Wadhurst)



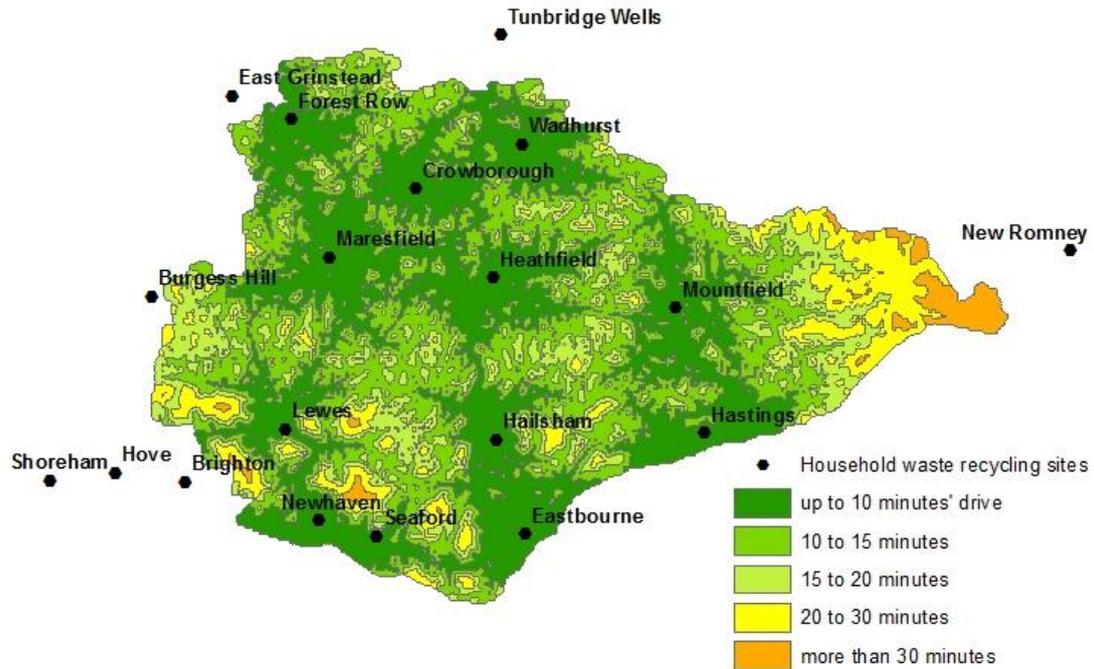
Map 2.3: Current accessibility contour for HWRS (including external sites) – detail for Lewes-Seafood area – with location of buildings and labelled settlements



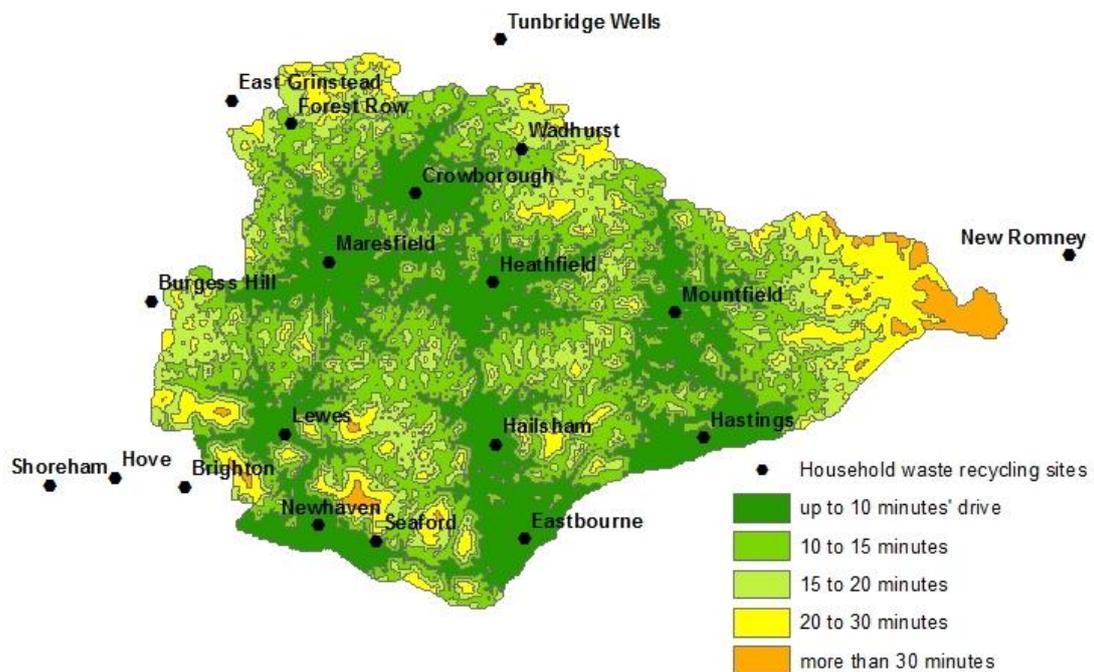
Map 2.4: Accessibility contour if three sites closed – detail for Lewes-Seafood area – including buildings



Map 2.5: Current accessibility contour for HWRS if all sites located outside East Sussex (operated by all other LAs) are excluded



Map 2.6: Accessibility contour for HWRS if sites outside East Sussex (operated by all other LAs) are excluded and all three sites closed



Note: The destinations indicated on the map are the locations of the HWRS, not town centres.

Accessibility Method statement

The journey time calculations are carried out using a commercially available software package called Visography TRACC, supplied by Basemap.

TRACC uses highways data to create journey times from origins to destinations. Highways information from an underlying road network creates a linear network that connects the origins and destinations together to give a fully routable network of nodes and lines which is saved into memory as a graph network.

This graph has various constraints attached such as travel distance, interchange penalties and stop limitations. The TRACC software then queries the graph with origin and destination co-ordinates and uses the Dijkstra shortest path algorithm to route between these points.

Car journeys include the walk from the origin to the road and once the road network is reached the journey proceeds link by link along the road network at speeds governed by data held in the model, which are specific to the road type, and in some cases the individual road link.

TRACC generates results files giving the shortest journey time from each origin to the closest destination. A population for each origin is calculated, based on the output area population from the 2011 Census.

This is then used to calculate the proportion of the total resident population that is able to access a household waste and recycling site within 20 minutes using the formula:

$$\text{Accessibility} = \frac{\text{Resident population with access at each origin point}}{\text{Total resident population}}$$

The data has been calculated using the most up-to-date available road network which is April 2016.

For car journeys, the maximum connection distance to the road network is set at 2km, and it is assumed that people using cars will travel down alleyways and footpaths at walking speed (4.8km/h) before using standard road speeds for the road based part of their journey.

Some HWRS located close to the border with East Sussex, but in other local authorities, have been included in this study. This study assumes that residents do have access to these sites provided by other local authorities, but has examined how accessibility at the periphery of the county would be adversely affected if these sites were unavailable to the county's residents.

The full list of Household Waste and Recycling Sites used is as follows:

East Sussex County Council			
Crowborough	Hastings	Mountfield	Hailsham
Eastbourne	Heathfield	Newhaven	Maresfield
Forest Row	Lewes	Seaford	Wadhurst
Brighton & Hove City Council	West Sussex County Council	Kent County Council	
Brighton Hove	Burgess Hill East Grinstead Shoreham	Tunbridge Wells New Romney	

Appendix 10: Newhaven Traffic Study Data

Site No. 00000025 Site Ref 00000025 Grid Ref 545963,101296
 A259 SEAFORD ROAD NEWHAVEN
 Vehicle Count Report
 Total Flow

	Mon Apr 03	Tue Apr 04	Wed Apr 05	Thu Apr 06	Fri Apr 07	Sat Apr 08	Sun Apr 09
02:00	34	33	41	53	31	82	114
03:00	27	31	27	32	39	65	66
04:00	38	52	38	50	50	47	46
05:00	104	93	118	93	114	66	50
06:00	303	278	286	292	269	152	125
07:00	888	904	939	932	889	398	283
08:00	1822	1905	1942	1858	1788	719	557
09:00	1824	1836	1854	1883	1869	1261	772
10:00	1673	1598	1790	1783	1697	1759	1387
11:00	1791	1739	1899	1863	1937	1976	1960
12:00	1933	1844	1935	1964	1991	2101	2188
13:00	1880	1841	1999	2038	2047	2124	2111
14:00	1845	1743	1941	1942	2093	2050	2171
15:00	1918	1777	2031	1997	2093	1991	1979
16:00	1937	1926	2021	2007	2096	1997	1999
17:00	2122	2048	2253	2169	2222	2045	1754
18:00	2202	2246	2222	2319	2221	1787	1751
19:00	1546	1607	1828	1706	1719	1516	1321
20:00	997	1068	1193	1201	1328	1046	1067
21:00	651	705	734	747	805	731	609
22:00	473	540	620	598	569	516	417
23:00	295	460	388	397	443	465	242

Site No. 00000025 Site Ref 00000025
 A259 SEAFORD ROAD NEWHAVEN
 Vehicle Count Report
 Total Flow + average Seaford HWRS traffic

	Mon Apr 03	Tue Apr 04	Wed Apr 05	Thu Apr 06	Fri Apr 07	Sat Apr 08	Sun Apr 09
02:00	34	33	41	53	31	82	114
03:00	27	31	27	32	39	65	66
04:00	38	52	38	50	50	47	46
05:00	104	93	118	93	114	66	50
06:00	303	278	286	292	269	152	125
07:00	888	904	939	932	889	398	283
08:00	1874	1957	1994	1910	1840	771	609
09:00	1876	1888	1906	1935	1921	1313	824
10:00	1725	1650	1842	1835	1749	1811	1439
11:00	1843	1791	1951	1915	1989	2028	2012
12:00	1985	1896	1987	2016	2043	2153	2240
13:00	1932	1893	2051	2090	2099	2176	2163
14:00	1897	1795	1993	1994	2145	2102	2223
15:00	1970	1829	2083	2049	2145	2043	2031
16:00	1989	1978	2073	2059	2148	2049	2051
17:00	2122	2048	2253	2169	2222	2045	1754
18:00	2202	2246	2222	2319	2221	1787	1751
19:00	1546	1607	1828	1706	1719	1516	1321
20:00	997	1068	1193	1201	1328	1046	1067
21:00	651	705	734	747	805	731	609
22:00	473	540	620	598	569	516	417
23:00	295	460	388	397	443	465	242

Percentage Difference						
Mon Apr 03	Tue Apr 04	Wed Apr 05	Thu Apr 06	Fri Apr 07	Sat Apr 08	Sun Apr 09

2.85%	2.73%	2.68%	2.80%	2.91%	7.23%	9.34%
2.85%	2.83%	2.80%	2.76%	2.78%	4.12%	6.74%
3.11%	3.25%	2.91%	2.92%	3.06%	2.96%	3.75%
2.90%	2.99%	2.74%	2.79%	2.68%	2.63%	2.65%
2.69%	2.82%	2.69%	2.65%	2.61%	2.48%	2.38%
2.77%	2.82%	2.60%	2.55%	2.54%	2.45%	2.46%
2.82%	2.98%	2.68%	2.68%	2.48%	2.54%	2.40%
2.71%	2.93%	2.56%	2.60%	2.48%	2.61%	2.63%
2.68%	2.70%	2.57%	2.59%	2.48%	2.60%	2.60%

1. Annualised trips - 83923 over three days per week (156 days per year)
2. If annualised trips averaged out over 362 days and 9 days per hour (days/hours that New haven is open) = average of 26 per hour
3. Assumed existing trips to Seaford would transfer to New haven and go via the A259
4. Assumed non-linked trips on the network and journeys would be two-way on the A259 travelling to Seaford HWRS = 52 average additional trips per hour
5. Assumed UAP2/3 classification of road (DMRB 79/99) of varying width - between 7.3m and 10m (average capacity vehicles per hour one way - 1,520 - and two way - 3,040)

Appendix 10 (cont.)

Site No. 00000025 Site Ref 00000025 Grid Ref 545963,101296
 A259 SEAFORD ROAD NEWHAVEN
 Vehicle Count Report
 Total Flow

	Mon Aug 21	Tue Aug 22	Wed Aug 23	Thu Aug 24	Fri Aug 25	Sat Aug 26	Sun Aug 27
02:00	26	43	29	29	42	67	89
03:00	39	37	31	31	54	51	56
04:00	109	108	111	110	101	97	79
05:00	256	263	271	264	262	167	95
06:00	766	819	813	812	705	302	258
07:00	1659	1779	1787	1719	1549	704	382
08:00	1819	1873	1892	1905	1715	1314	651
09:00	1670	1752	1778	1764	1494	1599	1234
10:00	1789	1838	1875	1995	1693	1992	1932
11:00	1917	2030	1934	2048	1967	2171	2120
12:00	1917	1846	2014	2018	1976	2127	2220
13:00	1928	2000	1950	1921	2061	2047	1928
14:00	1888	1950	1932	1971	1985	2035	1915
15:00	1873	2044	2172	2093	2197	2005	1937
16:00	2071	2212	2317	2278	2375	2009	1897
17:00	2128	2318	2248	2364	2244	1859	1713
18:00	1655	1925	1748	1951	1841	1635	1528
19:00	1035	1171	1195	1297	1418	1259	1186
20:00	757	836	797	904	912	903	905
21:00	477	556	582	631	654	544	525
22:00	348	422	418	459	531	456	333
23:00	166	193	225	237	314	308	222

Site No. 00000025 Site Ref 00000025
 A259 SEAFORD ROAD NEWHAVEN
 Vehicle Count Report
 Total Flow + average Seaford HWRS traffic

	Mon Aug 21	Tue Aug 22	Wed Aug 23	Thu Aug 24	Fri Aug 25	Sat Aug 26	Sun Aug 27
02:00	26	43	29	29	42	67	89
03:00	39	37	31	31	54	51	56
04:00	109	108	111	110	101	97	79
05:00	256	263	271	264	262	167	95
06:00	766	819	813	812	705	302	258
07:00	1659	1779	1787	1719	1549	704	382
08:00	1871	1925	1944	1957	1767	1366	703
09:00	1722	1804	1830	1816	1546	1651	1286
10:00	1841	1890	1927	2047	1745	2044	1984
11:00	1969	2082	1986	2100	2019	2223	2172
12:00	1969	1898	2066	2070	2028	2179	2272
13:00	1980	2052	2002	1973	2113	2099	1980
14:00	1940	2002	1984	2023	2037	2087	1967
15:00	1925	2096	2224	2145	2249	2057	1989
16:00	2123	2264	2369	2330	2427	2061	1949
17:00	2128	2318	2248	2364	2244	1859	1713
18:00	1655	1925	1748	1951	1841	1635	1528
19:00	1035	1171	1195	1297	1418	1259	1186
20:00	757	836	797	904	912	903	905
21:00	477	556	582	631	654	544	525
22:00	348	422	418	459	531	456	333
23:00	166	193	225	237	314	308	222

Percentage Difference							
Mon Aug 21	Tue Aug 22	Wed Aug 23	Thu Aug 24	Fri Aug 25	Sat Aug 26	Sun Aug 27	

2.86%	2.78%	2.75%	2.73%	3.03%	3.96%	7.99%
3.11%	2.97%	2.92%	2.95%	3.48%	3.25%	4.21%
2.91%	2.83%	2.77%	2.61%	3.07%	2.61%	2.69%
2.71%	2.56%	2.69%	2.54%	2.64%	2.40%	2.45%
2.71%	2.82%	2.58%	2.58%	2.63%	2.44%	2.34%
2.70%	2.60%	2.67%	2.71%	2.52%	2.54%	2.70%
2.75%	2.67%	2.69%	2.64%	2.62%	2.56%	2.72%
2.78%	2.54%	2.39%	2.48%	2.37%	2.59%	2.68%
2.51%	2.35%	2.24%	2.28%	2.19%	2.59%	2.74%

1. Annualised trips - 83923 over three days per week (156 days per year)
2. If annualised trips averaged out over 362 days and 9 days per hour (days/hours that New haven is open) = average of 26 per hour
3. Assumed existing trips to Seaford would transfer to New haven and go via the A259
4. Assumed non-linked trips on the network and journeys would be two-way on the A259 travelling to Seaford HWRS = 52 average additional trips per hour
5. Assumed UAP2/3 classification of road (DMRB 79/99) of varying width - between 7.3m and 10m (average capacity vehicles per hour one way - 1,520 - and two way - 3,040)

Appendix 11 Equalities Impact Assessment

Subject to the approval of the consultation, an Equalities Impact Assessment will be drafted on the HWRS service proposals, and completed after the consultation has been concluded, when the specific proposals to be implemented have been decided.

The previous Equalities Impact Assessments of the 2013/14 HWRS proposals came to the conclusion that there would be no impact on protected characteristics either arising from the recommended service closures, or as a result of the reduced operating hours which were implemented. However, the nature of this service does assume that a person is fit enough to travel (usually by car) and to be physically able enough to carry and dispose of waste.

We do not expect the latest proposals to impact on protected characteristics, although introducing a small charge for the disposal of certain 'non-household' waste types will affect residents on lower incomes to a greater degree. Local authorities are not legally obliged to deal with non-household waste and it may not be affordable for us to continue to accept it free of charge. Nevertheless, the charge would be just to cover the costs of processing this waste, and would be set at a reasonable rate compared to the alternatives such as hiring a skip. Waste classed as 'household waste' will continue to be free of charge to dispose of at the HWRSs.

We will ensure that the consultation is widely publicised and communicated, with the aim that all residents are aware of it and can submit their views. We will use a variety of media channels and groups, including parish and town councils, community groups/voluntary organisations representing particular sectors of society such as older people and those with a disability. We will make the consultation available in a range of formats on request, so that everyone can participate.