

## Stanford in the Vale Parish Council

Clerk: Mike Dew, 9 Glebe Road, Stanford in the Vale, SN7 8NB

Chairman: Peter Lewis, 1 Church Green, Stanford in the Vale, SN7 8LQ



*Household Waste Recycling Centres Consultations  
Oxfordshire County Council*

02 October, 2015

Dear Sirs,

This letter seeks to respond to the OCC Consultation on Household Waste Recycling Centres on behalf of Stanford in the Vale Parish Council.

### **Executive Summary:**

We object to the suggested closure of the HWRC in Stanford in the Vale on the following grounds:

- 1) No consideration of the full environmental impact is evident
- 2) The alternatives considered are so inadequate as to make the entire consultation appear pre-ordained and consequently open to challenge. We have put forward alternative proposals that should have been, and now should be, formally considered including:
  - a) Opening HWRCs 3 or 4 days per week and rotating staff so as to provide a better service
  - b) Opening HWRCs 3 or 4 days every 2 weeks and rotating staff so as to provide a better service
  - c) Opening 2 large HWRCs every day and the other 5 once every other week should save £350k (the required amount)
  - d) Charging for Car Parking at each HWRC £1.00 per 10 mins which does not fall foul of Government regulations as it is not a charge for disposal
  - e) A saving of £500k has been identified by stopping the green waste credit payment to districts. This has not been further explored
  - f) Any of the above proposals or any combination would be a better service to communities than the one proposed yet none are adequately considered/ considered at all.
- 3) Much discussion is made on the need to increase the retained size of retained HWRCs but no sums for the capital development are allowed for.
  - a) Where is the Capital to come from?
  - b) How much is required?
  - c) Why cannot this amount be re-invested in maintaining services?
- 4) Constant reference is made to the closure of the small Dean Pit HWRC with no analysis of demographic and socio-economic grouping of previous users, or to the vicinity to an open tip nearby in Warwickshire. We therefore contend that the fly-tipping analysis is fundamentally flawed
- 5) Rural Settlements are expected to travel longer distances. This is discrimination against Rural Communities

6) No analysis is provided as to when HWRCs are used.

### **DETAILED POINTS:**

Each of the points in the Executive Summary above are now considered in the same order in more detail below

#### **1) Environmental Impact:**

- a) No evidence is shown as to the CO<sub>2</sub> and other pollutant consequences of requiring residents to drive long distances
- b) The journey time from for example Shrivenham to the proposed nearest HWRC at Drayton is shown by the AA to be a 44 mile, 1¼ hour round trip. Just 1,000 such trips would generate 9.68 tonnes of CO<sub>2</sub> (based on a car with an average mpg of 40). 100,000 such trips would generate 9,680 tonnes of CO<sub>2</sub>. No consideration seems to be given to this at all.
- c) It is not unreasonable to assume that 11,000,000 extra miles of road travel would be generated by reducing the number of sites to 3 (based on 1.1million trips with an extra each way journey distance of 5 miles)
  - i) This would equate to ~30,000 tonnes of CO<sub>2</sub>
  - ii) No consideration also seems to have been given to the extra wear and tear on roads caused by all this extra traffic. What would the wear & tear caused by an extra 11,000,000 miles cost OCC annually to repair. Where is the analysis of this?

#### **2) Alternatives:**

##### **a) Opening HWRC's by rotation:**

- i) The paper cites shutting all sites but for 2 days per week as saving £150k. No analysis of this figure is given.
- ii) No consideration is given to shutting sites 3 or 4 days per week (& rotating staff). By logical extension of the above numbers:
  - (1) £300k would be saved if each HWRC was only open 3 days per week
  - (2) £600k could be saved if each HWRC was only open 3 days in every 2 weeks
- iii) It would even be feasible to open Redbridge & Drayton 7 days per week and retain the other 5 sites opening every other week and still save £350k. This would also negate the need for any capital expenditure on the proposed new Central North Oxfordshire site
- iv) The paper suggests that opening by rotation would:
  - (1) *'Increase pressure on days when sites are open'*, but surely this pressure would be less than that created by fewer sites
  - (2) *'Could lead to confusion over opening times for residents'*, but surely this is a little disingenuous in that almost all residents currently cope adequately with putting out the right recycle bin on the right day of the right week. For those who forget there is even a useful phone app to remind them. There is more than enough time to communicate restricted days opening

##### **b) Car Parking Charges:**

- i) As far as we can find there is no legislation that stops OCC charging for vehicles to park on OCC property
- ii) As each HWRC is OCC property a simple charge of £1.00 per parking visit of 10 minutes would achieve more than 3 times the required saving (based on 1.1m visits shown in the paper)
- iii) This would generate £1.1m pa whilst providing a service to the community
- iv) Automatic Car Parking Charging:

- (1) Separately, we believe that the HWRC's are already using Automatic Number Plate Recognition cameras to track/monitor the usage by those with "registered" vans - We think they have 12 visits a year via a permit, and I understand that these visits are automatically recorded/logged via the ANPR (Automatic Number Plate Recognition) and then presumably get charged extra if they go over.
- (2) It would be a simple extension of this scheme to provide a website where any OCC tax payer can register their vehicle, purchase a "block" of X entries and have a barrier with an ANPR camera that you either pay your parking fee, or use one of your pre-paid entries from.
- (3) This would generate revenue rather than lead to a service cut

**c) Stopping Green Waste Credits to Districts:**

- i) A saving of £500k has been identified by stopping the green waste credit payment to districts.
- ii) This has been rejected only on the basis that *'it could impact the relationship between district/City Councils'*
- iii) Why is this relationship more important than the relationship with the taxpayer/citizen
- iv) Why has this option not been more fully explored

**3) Capital Costs**

- a) The paper suggests that considerable expenditure is required to expand the existing facilities at:
  - i) Redbridge (to be expanded or replaced)
  - ii) Drayton (to be expanded or replaced)
  - iii) Central North Oxfordshire (totally new site)
- b) Where is the Capital to come from?
- c) How much is required?
- d) What will the cost of closure be for the existing sites?
- e) What will the re-instatement costs be of existing sites?
- f) Why cannot this amount be re-invested in maintaining services?
- g) Any sensible business *sweats* its existing assets. Why is OCC not taking this into account?

**4) Dean Pit Site Closure**

- a) Constant reference is made to the closure of the small Dean Pit site with no analysis of demographic and socio-economic grouping of previous users, or to the vicinity to an open HWRC nearby in Warwickshire.
- b) It might be expected that different socio-economic groups are more likely to fly-tip than other socio-economic groups due to varying levels of access to funds to travel longer distances
- c) Additionally the Dean Pit HWRD was quite close to alternative facilities in Warwickshire. This is not the case in some of the affected areas, notably Western Vale, and thus the temptation to fly tip will be greater
- d) We therefore contend that the fly-tipping analysis is fundamentally flawed
- e) Additionally no funds are allocated to clearing up fly-tipping presumably on the flawed grounds that there will be none

**5) Rural Settlements**

- a) Rural settlements already have lower access to services than those in towns & the City of Oxford. There is less public transport, less services and fewer facilities and yet now the justification for taking away something that rural residents do have is that it is needed more by urban communities.
- b) The paper among other things suggests:
  - i) Asking neighbours to drive waste to tips
  - ii) Using taxi's to take waste to tips
  - iii) Visiting when they are passing:

- (1) Most people who go to a tip are wearing scruffy gear and fill their cars to the maximum
- (2) Where are they supposed to be passing on the way too with a full car (and no family members) and in dirty clothing
- iv) Whoever authored this paper needs to take a reality check. Do they really think that their suggestions are practicable or do they just support a pre-ordained scheme.

**6) Days of usage**

- a) No analysis is provided as to when HWRCs are used.
- b) Evidence must exist to show that most use is at weekends, but this is not considered.
- c) Yet the fact that most use is on certain days of the week is rather material to plans to reduce the number of sites as this will lead to either huge congestion on peak dates or massive capital spend to increase the size of remaining HWRCs

**CONCLUSION:**

This Parish Council does not consider that a full objective assessment has been carried out

It does not think that all the options have been properly explored nor that all factors have been taken into consideration

It has suggested a number of alternatives that not only would save all of the money required but would also preserve the service to the taxpayers without the additional need for high additional capital expenditure

This Council is prepared to meet with OCC representatives at any reasonable time to expand on any of the above points

Fundamentally it contends that the Stanford in the Vale HWRC should remain open but would accept opening on a reduced number of days per year