
REPORT FOR: CABINET

Date of Meeting:	13 July 2017
Subject:	Harrow Re-use and Recycling Centre (HRRC)
Key Decision:	Yes
Responsible Officer:	Simon Baxter, Divisional Director of Environment and Culture
Portfolio Holder:	Councillor Graham Henson, Portfolio Holder for Environment
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix A- Resource Futures report

Section 1 – Summary and Recommendations

Harrow Council's vision outlining its commitment to effective waste management is set out in our Waste Management Strategy. The vision is:

“To increase reuse and recycling and reduce waste arising from householders, businesses and visitors”

In addition to the objectives set out in the Waste Management Strategy that will underpin the council's approach to meeting its key waste prevention aims, the Council has also set itself the following targets:

- Increasing recycling year on year.
- Achieving a recycling rate of 65% by 2030 in conjunction with the West London Waste Authority

The implementation and delivery of the targets set out in the Waste Management Strategy come against a back drop of nationally reducing recycling rates, which is reflected in Harrows own recycling performance.

Although factors outside of the Council's control have contributed to declining recycling figures, a key contributor for Harrow has been the increased levels of residual waste being disposed of at the Household Re-use and Recycling Centre (HRRC) at Forward Drive. In addition the site has come under significantly increased pressure, creating major traffic issues in the surrounding area, gridlocking the highway network and adversely affecting local residents and businesses.

The site at Forward Drive is the only HRRC in the borough, and also serves as a transfer station for council vehicles and comingled recycling collection vehicles. The past year has seen significant increases in residual waste and green waste delivered to the site. A number of factors may have influenced this including:

- Closure of Ruislip HRRC at Victoria Road
- HRRC changes introduced in neighbouring authorities which have diverted non-residents to the Harrow HRRC
- The use by some businesses of adapted private vehicles to bring trade related materials into the site
- Increasing population and the rise in new development across the borough
- The introduction of a charge for the collection of garden waste within the borough (it should be noted that only 15% of the total waste stream is green waste)

This paper presents the findings from our own observations and a review of activity in neighbouring boroughs undertaken by Resource Futures. The paper outlines options for Harrow in delivering future services at the Harrow Re-use and Recycling Centre (HRRC) so that services are better controlled and managed into the future.

Recommendations:

Cabinet is requested to:

1. Agree to introduce a charge of £20 to non-residents using the HRRC site per visit and to restrict non-residents from disposing of non-recyclable waste
2. Agree that all Harrow Residents produce proof of identification to demonstrate that they live in the borough in order to dispose of household waste free of charge.
3. Agree that Harrow residents be prevented from disposing of non-household waste free of charge, including building waste resulting from construction or demolition works and home renovation works.
4. Agree the use of Automatic Number Plate Recognition systems (ANPR) at the site to help control and restrict unauthorised usage
5. Delegate authority to the Divisional Director of Environment and Culture, following consultation with the Portfolio Holder for Environment, to progress implementation of these recommendations.

Reason: (For recommendation)

The above recommendations are made:

To better control and manage services at the HRRC in order to:

- Reduce the number of vehicles visiting the site, reducing traffic congestion and the associated issues this has caused to the surrounding area
- Increase throughput at the site
- Make the HRRC a less attractive option for out of borough users, significantly reducing the levels of waste the site imports
- Significantly reduce the amount of residual tonnage disposed of at the site and associated disposal costs
- Further reduce the amount of trade and business waste that is deposited at the site
- Improve recycling performance to support the Council's recycling targets.

Section 2 – Report

1. Introduction

1.1. The HRRC at Forward Drive is the site for residents within the borough to bring and dispose of items that are no longer required and is operated in accordance with the requirements of the Environmental Protection Act 1990. The site also serves as a waste transfer station for the Council's Clean and Green team and the comingled recycling collection vehicles which collect the blue bin waste. Over the past year there has been a significant increase in the number of visitors using the site primarily because of changes to the facilities and organisational arrangements of the HRRC's in adjoining boroughs. At its peak, the site was handling 35,000 cars a month on the upper level and several hundred vans on the lower level, averaging 150 vehicles an hour. A number of factors have influenced this increase in volumes, including:

- The Closure of Ruislip HRRC at Victoria Road
- HRRC changes introduced in neighbouring authorities which have diverted non-residents to the Harrow HRRC
- The use by some businesses of adapted private vehicles to bring trade related materials into the site
- Increasing population and the rise in new development across the borough
- The introduction of a charge for the collection of garden waste within the borough (it should be noted that only 15% of the total waste stream is green waste)

As a response to the increased demand on the site and the associated issues this has caused, the service has already undertaken the following actions:

- Reconfigured access to the Depot to reduce volume of vehicles using Forward Drive.
- Recruited additional staff in the HRRC to assist users in disposing of waste into the correct waste stream, increasing speed of throughput at the site.
- Commissioned Resource Futures to undertake a review of the HRRC and identify longer term solutions to the issues affecting the site
- Commissioned a feasibility study for the redevelopment of the site to provide a longer term solution for the HRRC that will improve throughput, reduce demand and traffic levels and improve recycling performance.
- Secured capital funding to redevelop the depot and developing proposals to create a new HRRC.
- Introduced a CCTV camera that will show live pictures of Forward Drive which will be available on the Your Place Your Space app and the Councils website to help residents plan their trip to the site.

Despite the above measures, this will not be sufficient to manage demand for the site into the future as the borough population and property numbers continue to grow. To mitigate these demands further action is required, both to minimise the congestion issues which affected the site and the surrounding area last summer and to allow the Council to manage the waste received more effectively and efficiently.

- 1.2. This paper also presents the findings from a review of activity in neighbouring boroughs undertaken by Resource Futures. Further the report outlines options for Harrow in delivering future services at the HRRC with a view to achieving:
- A reduction in the number of vehicles visiting the site, reducing traffic congestion and the associated issues this has caused to the surrounding area
 - Increased throughput at the site
 - Making the HRRC a less attractive option for out of borough users, significantly reducing the levels of waste the site imports
 - Ensuring that business waste is prevented from entering the site without incurring appropriate charges
 - A significant reduction in the amount of residual tonnage disposed of at the site and associated disposal costs
 - Improved recycling performance

2. Background

- 2.1 The council is required to provide a place for residents in its area to deposit their household waste free of charge, although not obliged to accept other types of waste free of charge.
- 2.2 Household waste is defined in the Environmental Protection Act (EPA) 1990 as:
- i. all waste collected by waste collection authorities under section 45(1) of the EPA 1990
 - ii. all waste arisings from Household Waste Recycling Centres (HWRCs) established under section 51(1)(b) of the EPA 1990
 - iii. waste collected by third parties for which collection or disposal re-use or recycling credits are paid under section 52 of the EPA 1990

Regulations confirm that household waste does not include waste arising from works of construction and demolition, including preparatory work, on a domestic property. .

- 2.3 Harrow Council is a constituent borough within the West London Waste Authority (WLWA) The WLWA has discharged the duty for the provision of HWRC's or as they are now known, HRRC sites to the individual constituent boroughs. There is a reciprocal arrangement amongst the WLWA boroughs (Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond upon Thames) that their residents may make

use of each others facilities, although there is no requirement to allow this to be free of charge (Hillingdon currently charge non-residents, including those from WLWA boroughs); in addition there is no requirement to accept all waste free of charge, given that some waste types are not classified as household waste. These anomalies have created a transfer of waste between boroughs as residents tend to use the nearest facility whether it is inside or outside of their home authority boundary or where it is perceived that certain waste types are more readily accepted.

- 2.4 The Harrow HRRRC is open 7 days per week from 8:30 to 16:30. The site currently manages over 40,000 tonnes of residual waste annually, resulting in a recycling rate of 34% in 2015/16, which is substantially lower than the average for English local authorities (61.7% (excluding rubble) in 2014/15 according to the National Household Waste Recycling Centre Directory).
- 2.5 There are a number of changes that could be introduced so that activity at the HRRRC is better controlled and managed. These changes are proposed in the paragraphs that follow.

3. Current Position

- 3.1 Forward Drive HRRRC processed 40,136 tonnes of material in 2014/15. 7,760 tonnes of residual waste was brought in by site users and an additional 6,360 tonnes from council vehicles. The site also received 26,016 tonnes of recyclable materials from residents and the Councils Refuse Collection Service. In the past twelve months the inputs of residual waste and green waste have risen. In 2017/18 residual waste costs £128.53* inc. transport per tonne for disposal whilst garden waste is £48.15* per tonne and other dry recyclable materials varies subject to market conditions

*figures correct as at May 2017

- 3.2 At its peak last year, the site was handling 35,000 cars a month on the upper level and several hundred vans on the lower level; this averages out at 150 vehicles an hour, although the busiest day sees usage exceed over 180 vehicles/ per hour. These traffic flows impact upon the adjacent road network causing congestion and frustration for local residents. The traffic disruption is exacerbated by HGV's waiting to pick up materials from the site and queueing to enter the adjacent Bakkovar site and at this time there is no facility to stack these vehicles without disrupting flow into the site.
- 3.3 There are inconsistencies between Harrow's waste policies and those of its neighbours. It noted that the increase in residual waste seems to be partly attributable to changes in policy in the other surrounding London Boroughs – Ealing started charging for disposal of DIY waste in 2015; Barnet (part of the NLWA) introduced measures to clamp down on trade waste abuse; other boroughs charge non-residents to use sites. The proportion of cross-border use is estimated to be 23% with

the majority (18%) coming from Brent although the closure of the Victoria Road HRRC in Ruislip could increase the number of residents from Hillingdon that use the site.

- 3.4 As an element of the implementation of the proposals we will be engaging with other partners in the WLWA area and Barnet as a neighbouring authority to let them know of our proposed arrangements and that there may be increased from their residents on their own recycling sites.

4. Future Operations

- 4.1 There are a number of options for which would mitigate the issues being experienced by the site, its users and local residents including policy changes such as proper enforcement of residents bringing in non-household waste such as construction and demolition waste, resident identification requirements to ensure that only Harrow residents are being allowed to dispose of household waste free of charge, the upgrading of trade waste controls would help reduce or better manage the usage of the site.

The introduction of Automatic Number Plate Recognition (ANPR) technology has helped identify those vehicles that are accessing the site on a regular basis indicating that the user is not a householder but is operating some type of business. There is however historical evidence that some individuals who are refused access on the basis of their frequent use of the facility then threaten and harass site employees and this risk needs to be factored into the operating arrangements and introduce a measure of uniformed security employees to discourage inappropriate behaviours.

It has been noted by the HRRC operatives that some business users have adapted people carriers, estate cars and sports utility vehicles to effectively become vans by removing the seats. This allows them to exploit the cars only arrangements for residents and ensures that they avoid paying the appropriate trade waste disposal charges. It is proposed that site staff are given authority to turn away or instruct them to use the chargeable waste option for any vehicles that they believe are carrying trade waste of any type.

The policy change expected to have the largest impact on the use of the site is the introduction of free resident use only, with a £20 charge for non-residents per visit. This is expected to reduce traffic and tonnages by up to 28% in the estimates provided by Resource Futures. In the first instance it is proposed that identification is confirmed by the production of a Council Tax Bill, a Bank Statement, an Electric, Gas or Water Bill or a Driving licence. It may be possible in the next financial year to issue all properties registered for Council Tax with a permit allowing the resident to access the site and confirming that without the permit a charge will automatically be levied. It is anticipated that the introduction of the requirement to show some form of identification as

residents enter the site will initially cause some delays but that users will quickly become used to the requirements which will speed up the process. The checks will take place at the entrance to the site so that those visitors that have no ID and choose not to pay can leave the site with the minimum of disruption

Some of the heaviest material brought in to the site is building rubble from household renovation works. There is no case law clarifying the extent to which household DIY waste should be classed as construction and demolition waste, such that it should not be included in the definition of household waste. Whilst the Council wants to provide facilities to permit the disposal of waste resulting from household renovation projects, it is recommended that this is restricted to a maximum of two bags of rubble or spoil per day free of charge and if the resident wishes to dispose of more than this, the whole load be deemed non-household waste and becomes chargeable. Repeat visits by residents disposing of small amounts of waste building materials will also result in a decision that the waste is non-household and therefore charges will be levied.

- 4.2 The Resources Future report attached as an appendix to this document analyses the costs and benefits of actions to improve recycling and reduce abuse of the site in its current form. As noted by Resource Futures, a further review should be undertaken after 2 years. It is anticipated that implementation of the policies recommended above will reduce both the number of vehicles visiting the site, as well as the site throughput.

5. Options considered

5.1 Do Nothing

If none of the actions are implemented the HRRC will not be managed or controlled in a coherent way and will neither address the problems that the site is facing in terms of inappropriate usage and the impact of traffic congestion on the surrounding area. Costs will continue to rise and there will be further pressure and concerns raised by local residents.

This option is not supported by officers.

5.2 Operational Changes

It is proposed that the operational changes highlighted in paragraph 4.1 should be implemented and a programme of communications to inform residents of the new arrangements be implemented for one month before the introduction of these requirements

It is recommended that delegated authority is given to the Divisional Director (Environment and Culture) in consultation with the Portfolio

Holder for Environment, Crime and Community Safety to enable the proposals to be implemented.

6. Resources

- 6.1 For many of the above options current staffing levels would need to be reviewed. If all of the proposals are adopted it is anticipated that much of the additional work load could be absorbed in the first instance by the existing workforce due to the reduction in site usage by non – residents. Should this reduction not come to fruition then it is suggested that the income generated by the charges for non-resident usage and additional trade waste income should be ring fenced to pay for the costs of a Security Guard and up to 3.5 Waste Recycling Assistants in order to create a cost neutral solution. The key priority in terms of the operations will be the introduction of the Security Guard followed by the Waste Recycling Assistants. The total cost of the proposals is £130,000 pa of which £38,500 covers the full time (seven day per week) presence of the Security Guard.

7. Performance Issues

- 7.1 Options will be reviewed in light of developing practice, guidance and changing legislation as necessary and in any event every three years. At the time of review consultation will take place with appropriate parties.
- 7.2 Delivery of these options will also be monitored through National Indicators (NI's). These include waste specific indicators as follows:
- NI 191: Residual household waste per head – Waste collected, minus material sent for recycling, composting or reuse.
 - NI 192: Household waste recycled and composted – Material sent for reuse, reprocessing or controlled biological decomposition.
 - NI 193: Municipal waste land-filled – Collected municipal waste sent to landfill, including recycling rejects will be reported by WLWA.
- 7.3 The Council's Annual Monitoring Report will also report on the following:
- Total municipal waste collected
 - Commercial waste collected
 - Commercial waste delivered to the Civic Amenity site by traders
 - Non-household waste delivered to the Civic Amenity site
 - Municipal waste recycled and composted
 - Waste to landfill
 - Tonnage of waste disposed by segment

- 7.4 The Environmental Service Delivery team will be responsible for monitoring this policy.

8. Environmental Implications

- 8.1 The aspects seeking approval are expected to have a hugely positive impact on the Environment, through the effective management of waste at the site, a reduction in the levels of residual waste at the site and an improvement in the Council's recycling performance.
- 8.2 Further environmental benefits will be realised through a significant reduction in the number of vehicles visiting the site and a reduction in traffic congestion that has affected the locality and road network around the site.
- 8.3 There is a potential over the short term for fly tipping to increase around the area of the HRRC as out of borough users and others who will be subject to the proposed charging regime illegally dump their waste in the local area after refusing to pay the disposal charges. If this does happen it is likely to be for a short period until users become aware of the new operating arrangements and use their own borough's recycling centres.

9. Risk Management Implications

- 9.1 This options paper is not included on the Directorate or any other corporate risk register.

10. Legal Implications

- 10.1 The following is the key legislation that governs waste management.

Section 51 of the Environmental Protection Act 1990 makes it a duty for 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. Each place must be provided either within the area of the authority or so as to be reasonably accessible to persons resident in its area, must allow 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 and each place must be available for the deposit of waste free of charge by persons resident in their area. The Council has a power to provide for household or other controlled waste by other persons to be deposited on terms of payment determined by it.

The Controlled Waste Regulations 1992 confirms that certain categories of waste are treated as household waste only for the purposes of s.34(2) of the 1990 Act, which means that owners of domestic properties only have the more limited duty of care in relation to this type of waste, but that it is not treated as household waste in relation to other duties. This includes waste

arising from works of construction or demolition, including waste arising from work preparatory thereof, produced on domestic properties.

11. Financial Implications

11.1 The proposed activities outlined in this report will require additional funding to ensure adequate staffing level which, according to WRAP guidance, is vital in running a successful HRRC. Additional staffing would allow for an effective implementation of changes in policy on site, such as commercial waste controls, DIY waste charges or checking residency of visitors. Current staffing levels do not allow enough resource to properly challenge suspected trade users or suspected non-residents; furthermore, suitable staffing levels are needed to free up staff time for assisting the public in segregating materials for recycling, and more generally directing site users to help them to increase their recycling efforts. It is anticipated that a security guard and some additional waste recycling assistants will be required, subject to the level of activity after the changes have been implemented, although every effort will be made to absorb the additional workload using existing workforce in the first instance. It is proposed that the additional staffing costs are to be met from income generated from the introduction of charges for non-resident usage and the disposal of non-household waste at Forward Drive HRRC.

11.2 It is anticipated that the introduction of the proposed activities will reduce vehicle throughput and hence reducing the volume of residual waste deposited at Forward Drive HRRC. This will have a positive impact on the disposal costs. Due to WLWA levy arrangements, waste deposited at HRRCs is charged on a Fixed Cost Levy basis. It is estimated that the proposed changes will provide an estimated disposal saving of £35-40k, net of other operating costs such as administration, communications etc. However this is totally dependent on how waste is diverted following the changes.

12. Equalities implications / Public Sector Equality Duty

The Equality Act 2010 outlines the provisions of the Public Sector Equality Duty which requires public authorities to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.

The broad purpose of this duty is to integrate considerations of equality into day to day business and keep them under review in decision making, the design of policies and the delivery of services so that the potential impact on any protected groups is identified and steps taken to mitigate or remove them.

An Equalities Impact Assessment (EqIA) has been carried out in relation to the future options.

Council Priorities

The Corporate Plan 2016-2019, entitled “Harrow Ambition Plan 2020” sets out the council’s vision of “Working together to make a difference for the vulnerable, communities, families and businesses”. The council’s strategy (priorities) to deliver its vision, between now and 2020 is to:

- Build a Better Harrow
- Be more Business-Like and Business Friendly
- Protect the Most Vulnerable and Support Families

The council’s vision and the corporate priorities have been taken into account when developing the options paper. In particular, “Build a Better Harrow” that includes a safe and clean environment.

Section 3 - Statutory Officer Clearance

Name: Jessie Mann	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 5 June 2017		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 11 May 2017		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	Yes
EqIA cleared by:	Dave Corby

Section 4 - Contact Details and Background Papers

Contact: Simon Baxter, Divisional Director – Environment and Culture. Simon.baxter@harrow.gov.uk

020 8416 8675

Background Papers: None.

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---