

NORTH LONDON WASTE AUTHORITY

REPORT TITLE: REUSE AND RECYCLING CENTRE NETWORK

REPORT OF: HEAD OF STRATEGY AND SERVICES

FOR SUBMISSION TO: AUTHORITY MEETING

DATE: 30 JULY 2024


SUMMARY OF REPORT:

The report provides an update on the provision of reuse and recycling centre (RRC) facilities in north London and recommends a consultation exercise on the possible closure of one facility.

RECOMMENDATIONS:

The Authority is recommended to:

- A. Note that the RRC network in north London is comprehensive and an additional RRC at the Edmonton EcoPark has recently been opened, which is owned directly by NLWA and operated by LondonEnergy Ltd
- B. Approve a consultation on the possible closure of the Gateway Road RRC, which is a site owned and operated by a private operator on behalf of NLWA. The consultation would provide information to better understand the potential effects of closing the facility and how any impacts might be mitigated.

SIGNED:  Head of Strategy and Services

DATE: 18 July 2024

1. INTRODUCTION

- 1.1. As a Waste Disposal Authority (WDA), NLWA has a statutory duty set out in Section 51 of the Environmental Protection Act 1990, to provide places 'at which persons resident in its area may deposit their household waste' and to ensure that these places are 'situated either within the area of the authority or so as to be reasonably accessible to persons resident in its area.' In north London, these places are referred to as Reuse and Recycling Centres (RRCs).
- 1.2. There are currently nine RRCs operating across the north London area, including the EcoPark RRC, which came into operation in July 2024.
- 1.3. Barrowell Green RRC is currently managed by the London Borough of Enfield although an Authority decision in February 2024 has paved the way for its management to be transferred to the Authority.
- 1.4. NLWA has direct responsibility for the management of eight of the current facilities: seven operated by LondonEnergy (LEL) and one, Gateway Road, is operated by Bywaters Ltd.

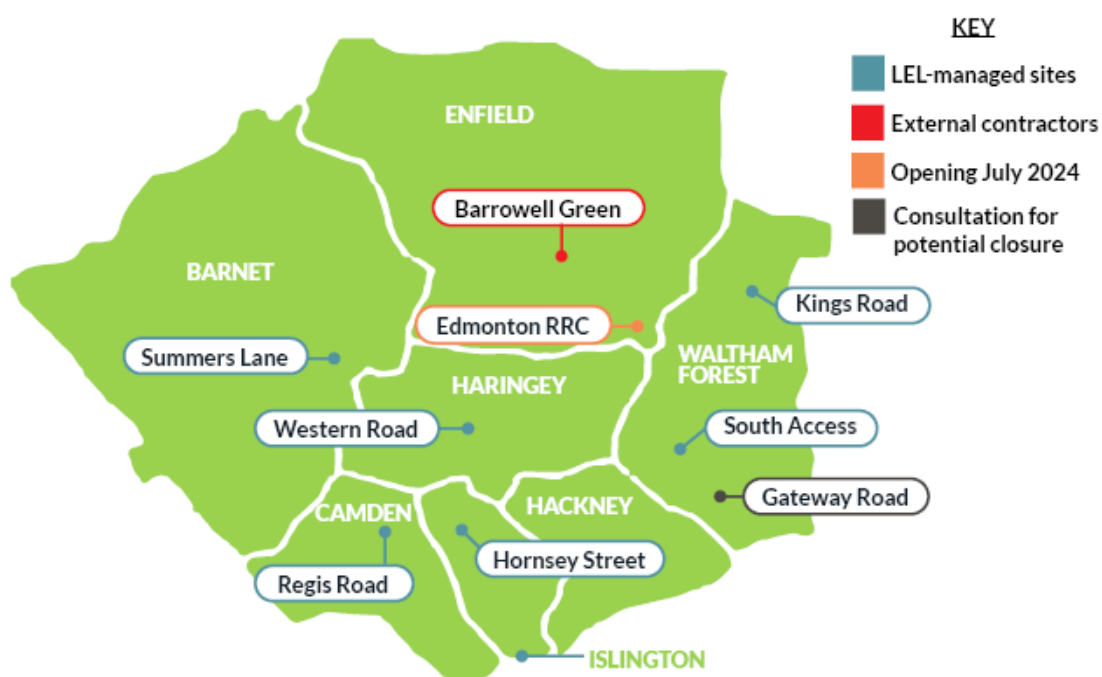


Figure 1: RRCs in North London

- 1.5. This network of RRCs provides north London residents with facilities to reuse, recycle and dispose of their waste conveniently and effectively, and NLWA strives to provide this network at the best possible value for money to our constituent boroughs and their residents. The cost of the current eight facilities provided by NLWA is funded by RRC levies on each of the boroughs. These total £6.244 million and cover the operation of the RRCs, as well as the transport and disposal of materials collected from Barrowell Green RRC.

- 1.6. RRCs receive about 5.7% of the total waste managed by NLWA, which is relatively low in comparison with other authorities. This is likely to reflect a number of factors:
- 1.6.1. Boroughs and the Authority have improved the collection services that are offered at the door to include garden waste collections, textiles, waste electrical and electronic equipment (WEEE) and bulky waste collections, which are now commonplace.
 - 1.6.2. The advent of online marketplaces like eBay and Vinted allows residents to sell or exchange items that may have previously been taken to an RRC.
 - 1.6.3. Growth in take back schemes at local retailers particularly for white goods and electricals.
 - 1.6.4. A reduction in car dependency. While action is being taken to make RRCs more welcoming to pedestrians and cyclists, larger waste loads still tend to be taken to sites by car

2. LONDON PROVISIONS

- 2.1. The table below compares the provision of RRC sites in the north London Area with the other WDAs and major waste partnerships. NLWA provides more sites but the average usage per site is lower than in the majority of other authorities.

Table 1: Number of RRCs Provided by London WDAs

Organisation	Number of Household RRCs
North London Waste Authority	Nine
East London Waste Authority	Four
West London Waste Authority	Six
Western Riverside Waste Authority	Three
South London Waste Partnership	Six

3. GATEWAY ROAD PROPOSAL

- 3.1. The opening of the new RRC at Edmonton EcoPark prompted officers to review the provision of RRCs across north London, to ensure that residents are properly served, and the facilities represent value for money.
- 3.2. Gateway Road is one of three RRCs situated in the London Borough of Waltham Forest. It is in the south-west of the borough, close to the border of Hackney, Tower Hamlets and Newham.
- 3.3. The site is not operated by LEL. The land it is situated on is owned by the operator and the site is restricted by its size and shape. This means the site offering is basic

and we have been unable to easily introduce the new recycling streams that are being offered across the network.

- 3.4. In 2023/24, Bywaters, the operator of Gateway Road, submitted a claim for increased operating and land cost associated with the site, arguing that these increases should be backdated. Their claim would increase the cost of the site by approximately 100%. While it is understood that operating costs faced by contractors have been subject to upward pressures, this would be a substantial increase with no gain in service provision.
- 3.5. It is proposed that the Authority consult the public on the closure of the Gateway Road RRC based on:
- 3.5.1. a potential overprovision of RRCs and waste services within the network generally and the east of the Authority area in particular,
 - 3.5.2. a lack of certainty over the future of a site not owned by the Authority or a constituent borough,
 - 3.5.3. the lack of space to improve the service offer in line with the rest of the RRC network, and
 - 3.5.4. the increased operating and land costs associated with the site.

4. GATEWAY ROAD USAGE AND ACCESSIBILITY

- 4.1. Table 2 below details the most recent user figures. This suggests that 74.1% of the users of the site reside in LB Waltham Forest, 17.2% of users are resident in LB Hackney and 8% come from outside of the constituent boroughs.

Table 2: Breakdown of Visitors to Gateway Road RRC

Borough	Visitors in 2022 (%)
Barnet	0
Camden	0
Enfield	0
Hackney	17.2
Haringey	0
Islington	0.6
Waltham Forest	74.1
Other	8.1

- 4.2. Guidance from Waste and Resources Action Plan (WRAP) suggests the following level of RRC provision is desirable, with some exceptions for very rural or very urban areas:

- 4.2.1. Maximum catchment radii for a large proportion of the population: 3 to 5 miles.
 - 4.2.2. Maximum driving times for the great majority of residents in good traffic conditions: 20 minutes.
 - 4.2.3. Maximum number of inhabitants for each RRC (in all but the most urbanised areas): 120,000.
 - 4.2.4. Maximum number of households for each RRC (in all but the most urbanised areas): 50,000.
- 4.3. WRAP accepts that the requirements set out at 4.2.3 and 4.2.4 in relation to RRC provision by population and number of households are not applicable in a very urban environment. Requirements at section 4.2.1 and 4.2.2 are easily met as demonstrated in the proximity and driving illustration see fig Figure 2 below.

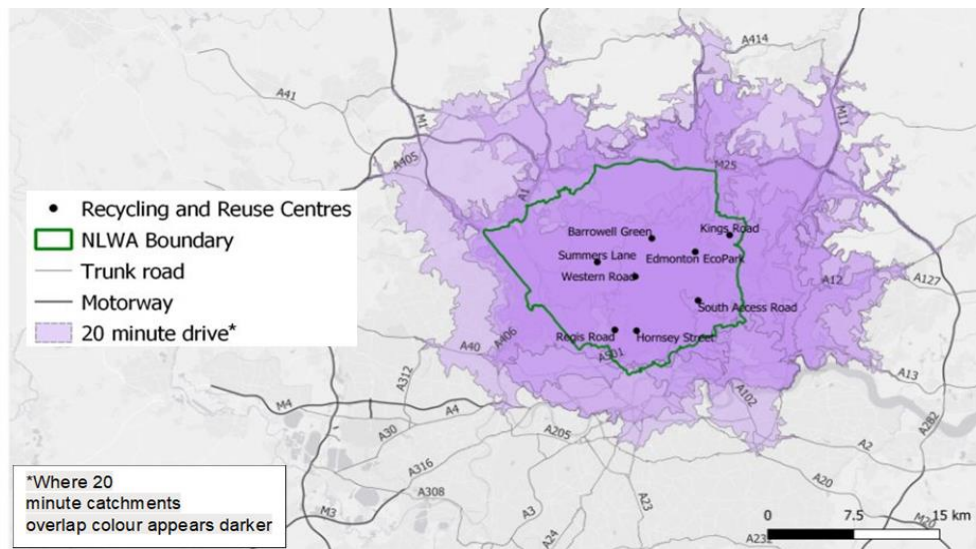


Figure 2: 20 Minute Catchments in the Seven North London Boroughs

- 4.4. Officers have modelled the potential displacement of Gateway Road users to other sites across the network and are confident that capacity at adjacent sites is sufficient to manage the expected increase in visitor numbers and tonnages with additional capacity to manage growth in future years.
- 4.5. South Access RRC is the nearest RRC to Gateway Road. It is 10 minutes away by bicycle, and slightly less by car.

5. COSTS

- 5.1. Bywaters Ltd own the site at Gateway Road and have provided services on behalf of the Authority since 2012. Prior to 2012 Bywaters Ltd provided the service on behalf of Waltham Forest (LBWF), through a service level agreement. The service level

agreement between LBWF and Bywaters Ltd was not amended when the management of the site transferred to the Authority and has now lapsed.

- 5.2. The annual operating cost of the site is approximately £250,000 per year, and a new commercial arrangement to continue the service would likely see this cost double.
- 5.3. As set out above, the Authority can fulfil – and go beyond – its statutory service obligations without needing the Gateway Road facility. Moreover, the opening of the EcoPark RRC will further enhance the availability of facilities to the public in the east of the area.
- 5.4. Officers have explored and reached a non-binding outline agreement with Bywaters Ltd to underpin a possible orderly ending of the service later in the year, should the Authority, having consulted residents and users, decide to close the site.

6. CONSULTATION

- 6.1. The Authority is obliged to conduct a formal consultation exercise before making a decision which would involve closure of a facility of this nature. Officers therefore propose that such a consultation be undertaken, in coordination with LB Waltham Forest and LB Hackney. This would explain the rationale for the proposal set out above and the available alternatives for residents who consider themselves affected by the closure and invite comments about both the proposed closure and further actions that could be taken to mitigate any effects should the site be closed.
- 6.2. It is proposed that the consultation take place over a six-week period and be designed to enable residents to voice their views through a number of media, including web and social media posts, direct email to residents that have previously used the booking system, signage at the site and face-to-face consultation at the gate to the site.
- 6.3. Officers are working with colleagues in LB Waltham Forest and LB Hackney to ensure that residents are made aware of the consultation as far as possible, using their communications channels and expertise in engaging with their communities.
- 6.4. Following completion of the consultation, officers will analyse responses and produce a report. The outputs from the consultation will inform the recommendations for a formal Authority decision on the future of Gateway Road RRC and any associated steps at South Access RRC and Hornsey Street RRC.

7. NORTH LONDON WASTE PLAN

- 7.1. The constituent boroughs adopted the current North London Waste Plan (the Plan) in 2022. The Plan relates to the land which might be needed to meet public and/or private waste management needs. In the Plan, the Gateway Road facility is listed as

a waste site. Policy 1 of the Plan seeks to protect existing waste capacity in north London, and requires that 'if, for any reason, an existing waste site is to be lost to non-waste use, compensatory waste capacity will be required. Compensatory capacity must, at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.'

- 7.2. Officers are confident that with other existing facilities and the newly opened RRC at Edmonton, there is enough RRC capacity in enough locations to meet the Authority's obligations under the Environmental Protection Act 1990 and serve residents positively, should Members decide in September that Gateway Road RRC should be closed.
- 7.3. Part of the non-binding agreement referenced at section 5.4 of this report requires the Authority to write to the administrators of the North London Waste Plan if the site is closed to confirm that it has no further need for the site.

8. GOVERNANCE OF DECISIONS

- 8.1. There is precedent within the Authority that elected Members from a constituent borough that is significantly impacted by an Authority decision should recuse themselves from that decision-making process. At this meeting Members are invited to approve undertaking a consultation on the possible closure of Gateway Road RRC.
- 8.2. The consultation would conclude in September, ahead of the September Authority meeting. A report outlining the findings of the consultation would be brought to Members at the September Authority meeting, with a recommendation for a decision.

9. EQUALITIES IMPLICATIONS

- 9.1. Officers will follow advice from LB Camden and LB Waltham Forest equalities teams to ensure that the consultation is accessible to all, and records respondents' protected characteristics to inform future decisions.

10. COMMENTS OF THE LEGAL ADVISER

- 10.1. The Legal Adviser comments are incorporated in sections 1 to 6 of this report.

11. COMMENTS OF THE FINANCIAL ADVISER

- 11.1. The Financial Adviser has been consulted in the preparation of this report and his comments have been incorporated.

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