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 SEPTEMBER 2024

SUMMARY OF REPORT:

The report details the public consultation which sought residents' views on the proposed closure of the Gateway Road Reuse and Recycling Centre. Having given due regard to respondents' views, the Authority's statutory duties and the equality impact assessment, officers recommend closing the site.

RECOMMENDATIONS:

The Authority is recommended to:

- A. Note the findings of the public consultation, the Authority's statutory responsibilities including its public sector equality duty and the equality impact assessment.
- B. After giving due regard to the findings of the public consultation, the Authority's statutory responsibilities including its public sector equality duty and the equality impact assessment, agree to permanently close the Gateway Road Reuse and Recycling Centre. This recommendation is based on the following:
 - The overprovision of Reuse and Recycling Centres (RRCs) and waste services within the network generally and the east of the Authority area in particular,
 - ii. The lack of certainty over the future of a site not owned by the Authority or a constituent borough,
 - iii. The lack of space at the site to improve the service offer in line with the rest of the RRC network, and
 - iv. The increased operating and land costs associated with the site.

NORTH LONDON WASTE AUTHORITY

- C. Delegate authority to the Managing Director to make arrangements for the orderly exit and closure of Gateway Road RRC including to:
 - i. Agree and enter a full and final settlement agreement with Bywaters in relation to the site.
 - ii. Confirm in writing to the administrators of the North London Waste plan that the Authority will no longer be using Gateway Road as a Reuse and Recycling Centre and that we have opened a larger RRC site at Edmonton EcoPark for the purpose of providing an alternative land for use as an RRC.
 - iii. Take any other steps necessary to give effect to the decision.

SIGNED:	/	 Head of	Strategy a	and Services

M/Mh

DATE: 18 September 2024

1. INTRODUCTION

- 1.1. At the Authority meeting held on 30 July 2024, Members considered a report which set out the rationale for considering closure of the Gateway Road RRC, set out below. Having accepted that rationale, Members approved a consultation exercise with residents, which began on 31 July and concluded on 11 September.
- 1.2. The consultation explained the rationale for the proposal and the available alternatives for residents and invited both views and comments on the proposal.
- 1.3. The consultation enabled residents to respond through an online survey, which was promoted via NLWA and borough media channels, as well as through signage on site. The Authority also provided an on-site member of staff during the consultation period to inform site users of the proposal, encourage responses, and to hand out paper surveys.
- 1.4. During the consultation approx. 218,000 residents were informed of the proposal, including:
 - 1.4.1. 34,122 via social media advertising,
 - 1.4.2. 2,105 views of the dedicated consultation webpage on the NLWA website,
 - 1.4.3. 2,062 subscribers to NLWA's general and RRC newsletters,
 - 1.4.4. 176,689 via borough social media and newsletters, and
 - 1.4.5. an estimated 3,223 visits to Gateway Road.
- 1.5. At the end of the consultation period, officers produced a report which compiles and analyses the responses, highlighting and addressing the key messages voiced by respondents. The report is at Appendix A of this report.

2. RATIONALE FOR CLOSURE

- 2.1. The rationale for closure includes:
 - 2.1.1. The overprovision of RRCs and waste services within the network generally and in the east of the Authority area in particular,
 - 2.1.2. The lack of certainty over the future of a site not owned by the Authority or a constituent borough,
 - 2.1.3. The lack of space to improve the service offer in line with the rest of the RRC network, and
 - 2.1.4. The increased operating and land costs associated with the site.

- 2.2. Without the Gateway Road facility, officers are confident that the remaining two RRCs in Waltham Forest and the further six RRCs in the wider north London area sufficiently meet the guidance from the Waste and Resources Action Plan (WRAP) which suggests the following level of RRC provision is desirable, with some exceptions for very rural or very urban areas:
 - 2.2.1. Maximum catchment radii for a large proportion of the population: 3 to 5 miles.
 - 2.2.2. Maximum driving times for the great majority of residents in good traffic conditions: 20 minutes.
 - 2.2.3. Maximum number of inhabitants for each RRC (in all but the most urbanised areas): 120,000.
 - 2.2.4. Maximum number of households for each RRC (in all but the most urbanised areas): 50,000.
- 2.3. The Authority has direct responsibility for the management of eight of the current facilities in the Authority's area: seven operated by LondonEnergy (LEL) and one, Gateway Road, is operated by Bywaters Ltd. In addition, the LB of Enfield operate Barrowell Green RRC.

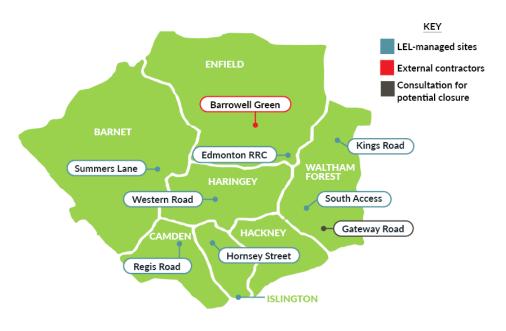


Figure 1: RRCs in North London

2.4. 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

- 2.5. The London Borough of Waltham Forest has three RRCs in its borough, more than any London borough except for Croydon, which also has three.
- 2.6. Gateway Road, one of the RRCs in Waltham Forest, is located in the south-west of the borough, close to the border of Hackney, Tower Hamlets and Newham.
- 2.7. The site is not operated by LEL. The land it is situated on is owned by the operator and with no long-term contract in place there is lack of certainty over the mid-term plans the operator/owner has for the site.
- 2.8. The site is also restricted by both its shape and size and so is only able to offer the basic service and the Authority has been unable to easily introduce the new recycling streams that are being offered across the north London network.

3. NORTH LONDON WASTE PLAN

- 3.1. The current North London Waste Plan (NLWP) was adopted in 2022 and is currently being reviewed. 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.'
- 3.2. Officers are confident that the new RRC facility at Edmonton represents more than adequate compensatory capacity, should Members decide that Gateway Road should be closed.

4. **CONSULTATION SUMMARY**

- 4.1. 730 responses were received, representing:
 - 4.1.1. 0.3% of the estimated number of residents informed of the proposal
 - 4.1.2. 0.14% of the population of Waltham Forest and Hackney
 - 4.1.3. 2.6% of the estimated annual visitors to Gateway Road Reuse and Recycling Centre.

4.2. Table 2 below shows the postcode districts provided by respondents and the number of responses from residents in each postcode. Postcodes E20 and E3 are in the boroughs of Newham and Tower Hamlets respectively. Residents of boroughs outside the Authority do not have an entitlement to use the facility.

Table 2: Postcode districts of respondents

Respondents	Postcode District
292	E11
210	E10
58	E9
46	E5
37	E15
34	E7
15	E8
10	E17
9	N16
3	E20
3	E4
3	N1
1	E1
1	E2
1	E3
1	EN3
1	IG8
1	N14
1	N17
1	N4
1	NW6

Demographic profile of those responding to the consultation:

4.3. Respondents to the consultation were requested to provide information about themselves to assist in assessing the consultation outcome. All information was anonymised. Table 3 below details the demographic mix of respondents; the results are less than 100% due to a number of respondents preferring not to disclose this information about themselves.

Table3: Demographic profile of respondents

Aga	Under 2	5	25	5-44	45-	-64	65 or over
Age	0.4%		3	4%	44	1 %	17%
Sex		Male				Female	
Jex	41%			47%			
	Significantly redu	ced ability	Somewh	at reduced	Unimpacte	d ability to	
Disability	to carry out da	y-to-day	ability to	carry out	carry out o	day-to-day	No disability
Disubility	activitie	:S	day-to-da	y activities	activ	rities	
	7%		1	1%	69	%	60%
Ethnicity	Asian or Asian British	Black, Afr Caribbean o Britisl	r Black	Mixed or ethnic	-	White	Other ethnic group
	7%	6%		49	%	60%	1%
Religion	Atheist/No religious beliefs	Christia	an	Jew	rish	Muslim	Other religion
	38%	23%		19	%	6%	1%

- 4.4. Respondents' views on the proposal
 - 4.4.1. 83.7% of respondents strongly disagreed
 - 4.4.2. 8.5% of respondents disagreed
 - 4.4.3. 2.7% of respondents neither agreed nor disagreed
 - 4.4.4. 2% of respondents agreed
 - 4.4.5. 2.9% of respondents strongly agreed

5. KEY THEMES IDENTIFIED IN THE CONSULTATION

- 5.1. The consultation contained a number of open questions to ensure respondents were given an opportunity to express their views. The responses to these questions have been analysed and sorted into a series of themes. The key themes are set out below together with the Authority's response.
- 5.2. Theme 1 It would be more inconvenient, and I would have to travel further to an alternative site: Mentioned in 500 responses.
 - 5.2.1. Response: It is accepted that the proposed closure of Gateway Road would mean marginally increased journey times for some residents to reach an alternative. RRC. However, given the extensive RRC network provided in north London, including the South Access Road facility, which is located 1.9 miles away, the increase in journey time is not expected to be more than a few minutes for residents that live closest to Gateway Road. Should members agree to the closure of Gateway Road RRC the remaining RRC network exceeds what is advised in the WRAP (Waste and

- Resources Action Plan) as being best practice for RRC provision as detailed in section 2.2 of this report.
- 5.2.2. Table 4 below shows the postcode districts provided by respondents and the difference in driving time by car to the nearest alternative RRC. This has been calculated using Google Maps, reflecting real world driving conditions for a journey at 12pm on a Saturday, one of the busiest times for RRC usage. In some respondents' postcode districts, there are one or more RRCs that are faster to travel to than Gateway Road. However, where it does takes longer to travel to an alternative site, the average additional journey time is 2.12 minutes, with five respondents experiencing additional journey times of six to eight minutes.

Table 4: Travel time of visitors to Gateway Road RRC and alternative RRC's

Respondents	Postcode District	Travel time to Gateway Road (minutes)	Difference in travel time to alternative RRC (minutes)	Alternative RRC
292	E11	10	2	EcoPark
210	E10	10	2	South Access Road
58	E9	11	5	South Access Road
46	E5	14	0	South Access Road
37	E15	16	4	South Access Road
34	E7	18	4	EcoPark
15	E8	21	-3	South Access Road
10	E17	20	-4	EcoPark
9	N16	18	-2	South Access Road
3	E20	10	6	South Access Road
3	E4	35	-24	EcoPark
3	N1	32	-17	Hornsey Street
1	E1	22	8	South Access Road
1	E2	22	4	Hornsey Street
1	E3	12	6	South Access Road
1	EN3	35	-23	EcoPark
1	IG8	28	-12	EcoPark
1	N14	42	-33	Barrowell Green
1	N17	29	-13	EcoPark
1	N4	33	-21	Western Road
1	NW6	60	-40	Regis Road

- 5.3. **Theme 2 It would risk an increase in fly-tipping in the local area:** Mentioned in 96 responses.
 - 5.3.1. Response: There is no evidence to suggest that the proximity of an RRC affects fly-tipping. The RRC provision across North London is comprehensive and the doorstep or has been enhanced in recent years. A

study conducted in 2021 by the Waste and Resources Action Programme (WRAP) looked at whether RRC charges — which were being introduced by some local authorities in the country — caused an increase in fly-tipping. The study concluded that introducing charging for RRC services did not have any statistically significant link with changes to fly-tipping rates. https://www.wrap.ngo/sites/default/files/2021-09/fly-tipping-rates-and-HWRC-charging.pdf. Evidence suggests that people who plan anti-social behaviour of this sort are not driven to do so by marginal changes to RRC provision.

- 5.3.2. It is unlikely that a significant number of residents who used Gateway Road in the past would resort to fly-tipping to avoid having to drive or cycle a few extra minutes to reach an alternative site. North London boroughs take fly-tipping seriously and prosecute offenders. They will continue to monitor the situation and act on any incidents.
- 5.4. Theme 3 Other sites are too far to either walk, cycle, or use public transport: Mentioned in 78 responses.
 - 5.4.1. Response: Should Gateway Road close, the RRC network within North London exceeds the WRAP best practice guide for levels of service provided as outlined in section 2.2. To encourage cycling and pedestrian access, South Access Road RRC has undergone works to improve accessibility for those on bikes or on foot.
- 5.5. *Theme 4 Pollution would increase as a result of longer car journeys*: Mentioned in 75 responses.
 - 5.5.1. Response: NLWA has opened a new RRC facility in Edmonton (LB Enfield) close to the boundaries of Haringey and Waltham Forest. This new facility is adjacent to the North Circular Road and will help reduce travel times for a significant number of residents across North London. Additionally, Gateway Road has a relatively low number of visitors, so while it is accepted that its closure would increase emissions from a relatively small number of journeys for a small number of residents, the new centrally based facility in Edmonton will reduce journey times and emissions across north London.
- 5.6. **Theme 5 It would discourage residents from recycling**: Mentioned in 58 responses.
 - 5.6.1. Response: Residents will continue to have access to an enhanced network of RRCs that exceed best practice guidance issued by WRAP for RRC provision. Furthermore, due to the size and layout of Gateway Road the Authority is unable to provide as comprehensive a list of reuse and

- recycling options compared to its other sites. Unfortunately, this means some materials that could be recycled if taken to a larger site such as South Access Road are being treated as residual waste at Gateway Road.
- 5.6.2. In addition, doorstep collections offered by Waltham Forest now include green waste, textiles, batteries, bulky collection service and WEEE, all commodities that previously required a trip to an RRC.

6. MITIGATIONS IDENTIFIED IN THE CONSULTATION

- 6.1. If Gateway Road Reuse and Recycling Centre were to close, are there any services which could be provided at other sites to reduce the impact on you? Answered by 65% of respondents.
 - 6.1.1. Suggestion 1 There is nothing that could be provided to reduce the impact: Mentioned in 222 responses.
 - 6.1.2. Suggestion 2 Location is the main issue, the services at other sites are fine: Mentioned in 73 responses.
 - 6.1.3. Response: As previously set out set out in section 5.2 of this report there is not expected to be a significant addition in travel time for residents.
 - 6.1.4. Suggestion 3 Improve household collections by accepting a wider range of materials, increasing frequency, or improving reliability: Mentioned in 55 responses
 - 6.1.5. Response: Officers will work with Waltham Forest and Hackney colleagues to explain the nature of respondents' concerns, with the aim of supporting service improvement in light of the responses received.
 - 6.1.6. Suggestion 4 Make the journey to South Access Road more straightforward by car: Mentioned in 17 responses.
 - 6.1.7. Response: Respondents suggested that they believed high levels of traffic in the area, and traffic management measures have made the journey to the South Access Road facility longer, making it more difficult to use as an alternative. Traffic management measures are introduced by local authorities to strike a balance between the interests of all members of the community, including residents affected by traffic. Any extended distance and journey times to alternative facilities is modest as outlined in table 4. Officers will work with the responsible local authority for traffic management to share these views, so they are taken into account when reviewing traffic management in the area.

7. OTHER COMMENTS RAISED THROUGH THE CONSULTATION

- 7.1. **Is there anything else you would like to share about this proposal?** Answered by 52.5% of respondents.
 - 7.1.1. Comment 1 Comments made about land ownership and plans to develop the site: Mentioned in 58 responses.
 - 7.1.2. Response: The Gateway Road site is privately owned by Bywaters Ltd and consequently the Authority has no control over its future use. The London Borough of Waltham Forest's only role in relation to the site is as Planning Authority.
 - 7.1.3. Comment 2 Closing the site would divert services away from the south of Waltham Forest, and impact these residents and Hackney residents the most: Mentioned in 18 responses
 - 7.1.4. Response: Hackney residents make up 17% of all Gateway Road users. However, for a large proportion of Hackney residents, there are RRCs with shorter journey times compared to Gateway Road. For Hackney residents where Gateway Road is the closest RRC, travelling to an alternative site only adds a few minutes to their journey.
 - 7.1.5. While a closure of a service is always regrettable and rarely seen as a positive by the residents who use it, it should be noted that there is currently a significant overprovision of Reuse and Recycling Centres within Waltham Forest, with two of these sites located in the south of the borough. If Gateway Road were to close, South Access Road, which has recently undergone significant improvement works, is only a short distance away from the Gateway Road site and will remain to serve residents in parts of Hackney and the south of Waltham Forest.
 - 7.1.6. Comment 3 Local authorities should be prioritising recycling and reducing car journeys: Mentioned in 15 responses.
 - 7.1.7. Response: The Authority has a duty to provide RRC facilities within its area. The provision across north London exceeds WRAP guidance on RRC provision and is favourable when compared to similar organisations across London. While it is regrettable that any facility should be withdrawn from service, the authority also has a responsibility to provide services in a cost-effective manner that provides value for money for residents. This proposal safeguards a high quality RRC service for residents that continues to represent value for money.

8. **EQUALITIES IMPLICATIONS**

- 8.1. Officers have followed advice from LB Camden, LB Hackney and LB Waltham Forest equalities teams to ensure that the consultation is accessible to all, and records respondents' protected characteristics to inform decisions.
- 8.2. Prior to going to public consultation, a provisional Equality Impact Assessment was developed to identify any potential equality impacts that could arise as a result of the proposal. No major disproportionate impacts were identified within this provisional assessment.
- 8.3. Following the conclusion of the public consultation, the Equality Impact Assessment was updated to include the information received, such as analysis of demographic information where it was provided by respondents, as well as analysis of respondents' comments which relate to a protected characteristic.
- 8.4. The updated Equality Impact Assessment identifies and considers a number of potential equality impacts. The full assessment is included within Appendix B. In summary, these impacts include:
 - 8.4.1. The impact of travelling further to an alternative RRC. There is a possibility that elderly residents and disabled residents may find it more difficult to travel to an alternative RRC. This may be because they are unable to drive longer distances, or find it harder to walk, cycle, and use public transport for a longer distance.
 - 8.4.2. This impact was raised in a number of respondents' comments: 14 in relation to age; 10 in relation to disability; and 1 in relation to pregnancy and maternity.
 - 8.4.3. As the vast majority of RRC users access the site by car, there is not expected to be a significant impact, noting the short distance between Gateway Road and South Access Road. There are also a number of dropoff points and collection services for material that needs to be recycled or disposed of. A list of the available options will be published in communications should Gateway Road close.
 - 8.4.4. It is possible that for those residents who are unable to drive, reaching an alternative site may be more difficult. As this impact would be on a very small number of site users, it must be balanced with the significant increase of cost involved in keeping Gateway Road open, and the value for money that this would represent.
 - 8.4.5. The impact of a possible risk of increased fly-tipping. Consideration has been given to a possible risk of increased fly-tipping in the area if Gateway

- Road were to close. An increase in fly-tipping incidents could lead to health and safety impacts on younger, older and disabled residents.
- 8.4.6. This impact was raised in one consultation respondent comment in relation to age and disability, but there is little evidence to suggest that RRC closures are linked to higher incidents of fly-tipping.

9. IMPLICATIONS OF A SITE CLOSURE

- 9.1. Should Members decide to close Gateway Road, a settlement agreement will be signed between NLWA and Bywaters outlining the terms of the closure and termination of the relationship between the two parties.
- 9.2. The agreement will be a full and final settlement between the parties
- 9.3. The agreement will ensure that there will not be any redundancies of Gateway Road site staff, and that they will be moved to another area of the business.
- 9.4. The agreement will require the Authority to write to the administrators of the North London Waste Plan to confirm that it has no further need for the site.
- 9.5. The agreement will provide Bywaters with sufficient notice of the closure of the site, with the site to close on Sunday 3 November 2024.

10. CONCLUSION AND RECOMMENDATION

- 10.1. The overprovision of RRCs and waste services, the lack of certainty of a privately owned site, the lack of scope for service improvement in a constrained site, and a significant increase in operating costs have led to the proposal to close Gateway Road RRC.
- 10.2. The cost of the site if it remains open are set to double, and there is also a significant backdated claim associated with the site that will be settled should the site close. Gateway Road is one of three RRC sites in the London Borough of Waltham Forest, and with the EcoPark RRC already in operation the site represents overprovision in the east of the area.
- 10.3. The site is not operated by LEL. The land it is situated on is owned by the operator and with no long-term contract in place there is lack of certainty over the mid-term plans the operator/owner has for the site.
- 10.4. Officers conducted a thorough review of the responses to the consultation, noting that the number of responses in relation to the Gateway Road userbase and the local population was small.
- 10.5. However, those who responded generally expressed strong views against the proposal, which is understandable when faced with a potential closure of a local

service. The majority of responses were concerned with the inconvenience of travelling to an alternative RRC. Ultimately, it was concluded that the additional travel of most residents is not significant enough to justify maintaining the site in light of the rationale of the proposal.

- 10.6. Accordingly, officers are recommending that the Authority approve the closure of the Gateway Road RRC from the 3 November 2024, for the reasons set out within this report and summarised at section 2.
- 10.7. In addition, officers are recommending the Authority delegates to the Managing Director the authority to enter into a full and final settlement agreement with Bywaters limited to facilitate the recommended closure and confirm to the NLWP administrators that the site is no longer required by the Authority for the purpose of being an RRC.

11. GOVERNANCE OF DECISIONS

11.1. 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 note the findings of the public consultation and recommended to make a decision on the closure of Gateway Road.

12. COMMENTS OF THE LEGAL ADVISER

- 12.1. The Legal Adviser comments are incorporated throughout this report.
- 12.2. The Public Sector Equality Duty set out in the Equality Act 2010 gives public authorities the duty to have due regard to the need to:
 - 12.2.1. eliminate unlawful discrimination,
 - 12.2.2. advance equality of opportunity between people who share a protected characteristic and those who don't, and
 - 12.2.3. to foster or encourage good relations between people who share a protected characteristic and those who don't.
 - 12.2.4. The protected characteristics relevant for the PSED are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

13. COMMENTS OF THE FINANCIAL ADVISER

13.1. The Finance update which is also on this agenda includes the forecast operating cost of Gateway Road on the basis that it is open. Future updates will reflect the decisions taken in this meeting.

Contact officer:

Michael Clarke Head of Strategy and Services North London Waste Authority Unit 1b Berol House 25 Ashley Road London N17 9LJ

Appendix A

Consultation on the proposed closure of Gateway Road Reuse and Recycling Centre Consultation Outcome Report

Introduction

In July 2024 the Authority approved a public consultation on a proposal to close Gateway Road based on the following:

Service overprovision

Waltham Forest currently has three RRCs in its borough, more than any London borough except Croydon. The proposed closure would save a significant amount of money and still leave the borough with two RRCs at South Access Road and Kings Road. NLWA has recently undertaken significant works at South Access Road to improve its accessibility.

In addition, the recent opening of a new RRC at Edmonton EcoPark means that were Gateway Road to close, the total number of RRCs in north London would remain at eight, consistent with the service level we have offered for many years.

Site constraints

The Gateway Road site is owned by Bywaters Ltd and there is no contract in place leading to a lack of certainty over the future use of the site.

Increased costs

Discussions have been held with the operator on the costs of continuing the service in future, and these are likely to increase by over 115% compared to 2022/23. Continuing to maintain the site at a significantly increased cost does not represent the best value for money for residents.

Methodology

Residents were asked to provide their views primarily through an online survey. Paper copies of the survey were made available at the Gateway Road site as well as provided upon request. A dedicated consultation page on the NLWA website was set up which provided a summary of the consultation, as well as links to the survey and an FAQ page containing further information about the proposal and alternative services available to residents.

To ensure awareness of the consultation to site users, information signs were placed around the site for the duration of the consultation period, directing residents to the NLWA webpage. Site staff were also provided with paper copies of the survey and information sheets for residents that would prefer them over the online materials.

In order to provide awareness of the consultation to residents more widely, NLWA, Waltham Forest, and Hackney social media channels were utilised. Paid social media advertisements were also used to ensure as many residents were aware of the consultation and the proposal.

The aim of the survey itself was to give the opportunity for residents to voice their views on the proposal, and give NLWA a greater understanding of how residents could be impacted if Gateway Road were to close. Prior to being taken to the survey questions, residents were presented with information including an overview of the consultation, details of the proposal and the rationale behind it, as well as further information on site usage, comparisons with other RRCs, and an indication of the next steps following the closure of the consultation.

Following this, residents were presented with the survey, which used a combination of closed and open questions. The closed questions were focussed on understanding how residents use the Gateway Road site. This was particularly important as there are no records kept of how many people use the site, how often they use it, or where site users come from.

Open questions were utilised to give residents the opportunity to provide detail on how they would be impacted by a site closure. For this purpose, open questions were preferable over closed questions as it ensured that residents had the ability to provide responses in the level of detail they would prefer.

Following the questions on the proposal, residents were given the option of answering some demographic questions about themselves. This was to give NLWA a greater understanding of who uses the site, and if certain residents would be more impacted by a site closure than others.

The full consultation, including the preceding information and survey questions, is included as an appendix to this report.

Consultation reach

Over the consultation period, a total of 730 responses were received, the majority of which were submitted through the online survey, with some received via paper copies and telephone. The survey itself was viewed 1,766 times, meaning that 41% of those who viewed the survey went on to submit a response.

The number of responses has been cross-referenced with relevant figures in the table below:

	Number of people	Responses as a proportion
Population of Waltham Forest and Hackney	539,262	0.14%
Estimated total annual Gateway Road Visits* *Not unique visitors	27,936	2.6%
Estimated number of people informed of the consultation	218,200	0.3%

Over the course of the consultation period, the consultation page hosted on the NLWA website received 2,105 views, the targeted social media advertising reached 34,122 people, and 145 of those who viewed the adverts proceeded to click-through for more information. Additionally, a further 176,700 people were reached through borough communication channels including social media and newsletters.

Respondent profile

Respondent type

The responses received to the consultation were almost entirely from people responding on an individual level. One response was received from an organisation.

Are you	Responses	%
Responding as an individual	729	99.9%
Providing the official response of an organisation, group or business	1	0.1%
Responding as a democratically elected representative (e.g. a councillor, London Assembly Member, or a Member of Parliament)	0	0%

Respondent location

Respondent borough

The vast majority of respondents said they were residents of Waltham Forest, where Gateway Road is located. Around 18% said they lived in Hackney, which is consistent with the site user survey previously conducted. The site receives a significant number of Hackney residents due to its proximity to the borough and because Hackney does not have an RRC within the borough.

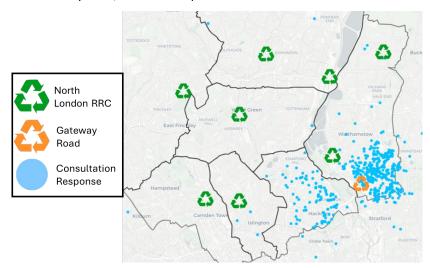
Despite north London RRCs only being available to residents of the seven north London boroughs, a number of responses were also received from site users that do not live in one of these boroughs. Newham residents were the most notable of these, making up 3% of consultation responses.

Are you a resident of, or are you representing, any of the following London boroughs?	Responses	%
Barnet	0	0%
Camden	0	0%
Enfield	1	0.1%
Islington	4	0.6%
Hackney	130	17.8%
Haringey	0	0%
Waltham Forest	569	78%
Other local authority: Newham*	22	3%
Other local authority: Tower Hamlets*	2	0.3%
Other local authority: Brent*	1	0.1%
Other local authority: Redbridge*	1	0.1%
*Non-north London Borough		

Postcode analysis

Map of respondent postcodes

Using the postcodes provided by respondents, the below map shows that a large number of responses came from those who live in the surrounding areas of the site. There were also responses from people who's closest RRC is one other than Gateway Road, as well as responses from those who live outside of the NLWA area.



RRC travel times by postcode

The below table shows the postcode districts provided by respondents and the difference in driving time by car to the alternative RRC that has the fastest journey. This has been calculated using Google Maps, reflecting real world driving conditions for a journey at 12pm on a Saturday, one of the busiest times for RRC usage.

For the majority of respondents living in postcodes E11 and E10, it would take an additional two minutes to drive from the centre of their postcode district to an alternative RRC.

In some respondents' postcode districts, there are one or more RRCs that are faster to travel to than Gateway Road. However, where it does takes longer to travel to an alternative site, the average journey time is 2.12 minutes on average and six to eight minutes more for five respondents.

Respondents	Postcode District	Gateway Road (minutes)	Difference in travel time between Gateway Road and alternative RRC with shortest journey (minutes)	Alternative RRC
292	E11	10	2	EcoPark
210	E10	10	2	South Access Road
58	E9	11	5	South Access Road
46	E5	14	0	South Access Road
37	E15	16	4	South Access Road
34	E7	18	4	EcoPark
15	E8	21	-3	South Access Road
10	E17	20	-4	EcoPark
9	N16	18	-2	South Access Road
3	E20	10	6	South Access Road
3	E4	35	-24	EcoPark
3	N1	32	-17	Hornsey Street
1	E1	22	8	South Access Road
1	E2	22	4	Hornsey Street
1	E3	12	6	South Access Road
1	EN3	35	-23	EcoPark
1	IG8	28	-12	EcoPark
1	N14	42	-33	Barrowell Green
1	N17	29	-13	EcoPark
1	N4	33	-21	Western Road
1	NW6	60	-40	Regis Road

Respondent demographics

In order to understand how the proposal could impact people differently, respondents were given the option to answer a series of questions about themselves.

The demographic information provided have been analysed alongside respondent's views on the proposal to understand how certain demographics may be impacted by the proposal. The full analysis of these has been included within the Equality Impact Assessment for this proposal.

Age

	Responses	%
16-24	3	0.4%
25-34	75	10.3%
35-44	172	23.6%
45-54	159	21.8%
55-64	159	21.8%
65-74	109	14.9%
75-84	17	2.3%
85 or over	1	0.1%
Prefer not to say/No answer	35	4.8%

Sex

	Responses	%
Female	344	47.1%
Male	301	41.2%
Prefer to self-describe: Non-binary	1	0.1%
Prefer not to say/No answer	83	11.5%

Gender identity

	Responses	%
Identified gender the same as gender registered at birth	613	84%
Identified gender not the same as sex registered at birth	4	0.5%
Prefer not to say/No answer	113	15.5%

Sexual orientation

	Responses	%
Bisexual	11	1.5%
Gay/lesbian	48	6.6%
Heterosexual/straight	431	59%
Prefer not to say/No answer	240	32.9%

Disability

Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?		%
Yes, which reduce my ability to carry out my day-to-day activities a lot	50	6.8%
Yes, which reduce my ability to carry out my day-to-day activities a little	83	11.4%
Yes, but they don't reduce my ability to carry out my day-to-day activities at all	41	5.6%
No	436	59.7%
Prefer not to say/No answer	120	16.4%

Ethnicity

Which ethnic group best describes your ethnicity?	Responses	%
Asian or Asian British	54	7.4%
Black, African, Caribbean or Black British	43	5.9%
Mixed or multiple ethnic groups	28	3.8%
White	435	59.6%
Jewish	2	0.3%
Other ethnic groups	9	1.2%
Prefer not to say/No answer	159	21.8%

Religion

What is your religion?	Responses	%
Atheist/No religious beliefs	278	38.1%
Christian	171	23.4%
Jewish	8	1.1%
Muslim	41	5.6%
Sikh	3	0.4%
Hindu	2	0.3%
Other religions	5	0.7%
Prefer not to say/No answer	222	30.4%

Reuse and Recycling Centre usage

Have you ever used Gateway Road Reuse and Recycling Centre?

	Responses	%
Yes	704	96.4%
No	26	3.6%

How often do you use Gateway Road Reuse and Recycling Centre?

	Responses	%
Four times a year or more often	552	75.6%
Around three times a year	96	13.2%
Around twice a year	29	4%
Around once a year	17	2.3%
Less than once a year	7	1%
Never	3	0.4%
No answer	26	3.4%

What is your main method of transport to Gateway Road Reuse and Recycling Centre?

	Responses	%
Car	622	85.2%
Motorcycle	0	0%
Van	3	0.4%
Bicycle	18	2.5%
Public transport	11	1.5%
Walking	45	6.2%
Other	5	0.7%
No answer	26	3.6%

Do you use any other reuse and recycling centres? Please select all that apply.

Where respondents have selected multiple RRCs, each RRC selected has been counted as a separate response. As a result, the response count for this question will add up to more than the 730 responses received.

	Responses	%
South Access Road – Waltham Forest	103	13.9%
Kings Road – Waltham Forest	12	1.6%
Hornsey Street – Islington	9	1.2%
Western Road – Haringey	1	0.1%
Barrowell Green - Enfield	1	0.1%
Edmonton EcoPark – Enfield	3	0.4%
Summers Lane – Barnet	2	0.3%
Regis Road – Camden	1	0.1%
Non-north London reuse and recycling centre	5	0.7%
None/no answer	606	81.6%

Key findings: Proposal to close Gateway Road Reuse and Recycling Centre Response to the proposal

When asked for their views on the proposal, only a small proportion of respondents said that they agreed with the proposal, with a significant majority of respondents saying that they either disagreed or strongly disagreed.

What are your views on the proposal to close Gateway Road Reuse and Recycling Centre?	Responses	%
Strongly agree	21	2.9%
Agree	15	2%
Neither agree nor disagree	20	2.7%
Disagree	62	8.5%
Strongly disagree	611	83.7%
Don't know	1	0.1%

Impact of the proposal on respondents

The vast majority of respondents said they would be impacted if Gateway Road were to close. Where respondents said that they would be impacted, they were presented with a comment box to explain to what extent they would be impacted.

Would this proposal impact you if it were implemented?	Responses	%
Yes	705	96.6%
No	25	3.4%

How would this proposal impact you if it were implemented?

96.6% of respondents provided a comment to this question. These comments have been analysed and broken down into key themes that were mentioned across multiple responses. The five most common themes were:

More inconvenient/would have to travel further: 500 responses, 69% of total responses

A large majority of respondents said that the main impact would be that they would have to travel further in order to use an RRC, and that travelling to an alternative RRC would be more inconvenient for them.

It is accepted that should Gateway Road RRC close, a number of RRC users would need to travel slightly further to reach an alternative site. However, due to the extensive RRC network provided in north London, including the South Access Road site, which is located just 1.9 miles away, there is not expected to be a significant addition to the majority of residents' journeys. This can be seen in the postcode analysis section within this report.

Furthermore, should Gateway Road close, residents should be reassured that they will still be provided with an RRC network that goes above and beyond national best practice as set out in the WRAP guidance outlined in the original consultation.

Increased fly-tipping: 96 responses, 13% of total responses

A large number of respondents also expressed their concern that a closure would risk increasing the levels of fly-tipping in the local area due to people not being able to access an RRC as easily.

There is little evidence to suggest a small change to the RRC network would increase the incidents of fly-tipping. The RRC network across North London is enhanced when compared to previous years, and local services provided by Waltham Forest and the NLWA provide more opportunities for residents to manage their waste from their doorstep.

It is unlikely that a large number of residents that had or would have previously used Gateway Road would resort to fly-tipping on the basis that they had to travel a short additional distance to reach an alternative site.

However, officers from Waltham Forest will monitor the situation closely and take appropriate action should fly-tipping increase.

Other sites too far to walk/cycle/use public transport: 78 responses, 11% of total responses

A number of respondents said that they do not drive, do not own a car, or cannot drive, and as a result access Gateway Road on foot, by bicycle, or by public transport. Because of this, these residents said that using these methods of transport to get to an alternative RRC would either be not possible or would be significantly more difficult for them.

It is accepted that while the additional distance may be a short distance when driving, a further 1.9 miles may be difficult for residents who chose to walk, cycle or use public transport to travel to the site. While NLWA understand that accessing an RRC would be more difficult for these residents should Gateway Road close, this is a very small proportion of site users, and this must be balanced with the significant increase in costs associated with keeping the site open.

Increased pollution from longer car journeys: 75 responses, 10% of total responses

A number of respondents mentioned that they were concerned that if Gateway Road were to close, site users would be required to travel further to an alternative RRC, and as a result the additional emissions from longer car journeys would increase air pollution.

NLWA has opened a new RRC facility in Edmonton (LB Enfield) close to the boundaries of Haringey and Waltham Forest. This new facility adjacent to the North Circular will help reduce travel times for a significant number of residents across North London. Additionally, Gateway Road has a relatively low number of visitors, so while it is accepted for a small number of residents the closure of Gateway Road may make a small increase to journey times and vehicle emissions, the new centrally based facility in Edmonton will reduce journey times and emissions overall.

It would discourage recycling: 58 responses, 8% of total responses

A number of respondents expressed that either they themselves, or that others would be discouraged from recycling if Gateway Road were to close.

It is important to recognise the significant expansion of recycling provision for residents in recent years. In addition to household collections now collecting a wider range of materials than ever before, South Access Road and other LEL-operated RRCs have seen an expansion in the number of materials that they are able to accept. This is something that is unable to be provided at Gateway Road due to the constraints of the site in terms of size and operational control.

If Gateway Road Reuse and Recycling Centre were to close, are there any services which could be provided at other sites to reduce the impact on you?

65% of respondents provided a comment to this question. These comments have been analysed and broken down into key themes that were mentioned across multiple responses. The five most common themes were:

Nothing could be provided to reduce the impact: 222 responses, 30% of total responses

The most recurrent comment mentioned in response to this question was that there is nothing that could be provided at other sites to reduce the impact that a closure of Gateway Road would have on them.

Location is the main issue, the services at other sites are fine: 73 responses, 10% of total responses

The comments received in relation to this theme suggested that it was not a case of services available at the other sites, and that the services provided at alternative sides equal or exceed the provision of Gateway Road. However, the main cause of the impact on them was the location of the alternative sites, and that it would be more difficult or less convenient to travel to another site.

It is accepted that should Gateway Road RRC close, a number of RRC users would need to travel slightly further to reach an alternative site. However, due to the extensive RRC network provided in north London, including the South Access Road site, which is located just 1.9 miles away, there is not expected to be a significant addition to the majority of residents' journeys. This can be seen in the postcode analysis section within this report.

Furthermore, should Gateway Road close, residents should be reassured that they will still be provided with an RRC network that goes above and beyond national best practice as set out in the WRAP guidance outlined in the original consultation.

Improve household collections by accepting a wider range of materials, increasing frequency, or improving reliability: 55 responses, 8% of total responses

A number of respondents expressed their views on the provision of household collections. Some respondents noted that collections do not accept all materials that are accepted at RRCs such as paint, oil, and wood, and suggested that expanding the materials accepted by collection would reduce the impact a closure of Gateway Road would have on them. Some respondents also raised concerns at the cost of garden waste and bulky waste collections. The frequency of collections was mentioned by some respondents, saying that collections are not frequent enough for their needs.

Service reliability was a frequently raised concern, with a number of respondents mentioning that the additional materials that are offered for household collection were often missed by the collection crew and left at the kerbside.

In light of these comments raised, NLWA will work with Waltham Forest and Hackney to explain the nature of respondents' concerns with the aim of supporting service improvement for residents.

Make the journey to South Access Road more straightforward by car: 17 responses, 2% of total responses

A number of respondents noted that high levels of traffic in the area, as well as traffic management measures put into place including road closures and Low Traffic Neighbourhoods have made the journey to South Access Road significantly longer, making it more difficult to use as an alternative to Gateway Road.

In light of these comments, NLWA will work with the responsible local authority for traffic management to share with them the views raised by respondents and to take these views into account when reviewing traffic management in the area.

Provide an alternative site in the local area: 15 responses, 2% of total responses

Some respondents said that if Gateway Road were to close, an alternative RRC should be provided in the local area.

It should be noted that there is currently a significant overprovision of Reuse and Recycling Centres within Waltham Forest, with two of these sites located in the south of the borough. If Gateway Road were to close, South Access Road, which has recently undergone significant improvement works, will remain to serve the south of Waltham Forest, and is only a short distance away from the Gateway Road site.

Is there anything else you would like to share about this proposal?

52.5% of respondents provided a comment to this question. 232 comments mentioned themes that were addressed in previous questions. 163 comments contained additional views. These comments have been analysed and broken down into key themes that were mentioned across multiple responses. Three themes were mentioned in more than ten comments. These are:

Comment relating to the land Gateway Road occupies or the new housing developments near to the site: 58 responses, 8% of total responses

Some respondents mentioned the future of the land that Gateway Road occupies. Comments included the local authority closing the site in order to develop on the land or sell the land to developers. Other comments mentioned the new housing developments that surround the site, including that the proposal to close Gateway Road was influenced by the responsible developers.

While it is understandable that residents are concerned about the future of the site, the land that Gateway Road occupies is entirely privately owned and consequently NLWA have no control over its future use. The London Borough of Waltham Forest have no ownership or control over the future use of the site other than in a planning capacity. The proposal to close Gateway Road was entirely formed on the rationale outlined in the consultation.

Closing the site would divert services away from the south of Waltham Forest, and impact these residents and Hackney residents the most: 18 responses, 2% of total responses

The comments received in relation to this theme suggested that a closure of Gateway Road RRC would be diverting services away from the southern part of Waltham Forest, an area which some respondents said they feel is more disadvantaged than other parts of the borough and is often overlooked by the local authority. Hackney residents also noted that it would be reducing their available options.

As Hackney residents make up around 17% of all Gateway Road users, it is recognised that these residents use Gateway Road RRC due to its proximity to the borough, and that there is no RRC site provided within Hackney. However, it is the case for most site users in Hackney that travelling to South Access Road site requires only a slightly longer journey.

While a closure of a service is always regrettable and rarely seen as a positive by the residents who use it, it should be noted that there is currently a significant overprovision of Reuse and Recycling Centres within Waltham Forest, with two of these sites located in the south of the borough. If Gateway Road were to close, South Access Road, which has recently undergone significant improvement works, is only a short distance away from the Gateway Road site and will remain to serve residents in Hackney and the South of Waltham Forest.

Local authorities should be prioritising recycling and reducing car journeys: 15 responses, 2% of total responses

Some comments mentioned the local authority's aspirations of increasing recycling and reducing car journeys, and that a closure of Gateway Road would be inconsistent with this these aspirations.

NLWA has a duty to provide RRC facilities within its area. The provision across North London exceeds WRAP guidance on RRC provision and is favourable when compared to similar organisations across London. While it is regrettable that any facility should be withdrawn from service, the authority also has a responsibility to provide services in a cost-effective manner that provides value for money for residents. This proposal safeguards a high quality RRC service for residents that continue to represent value for money.

Additional comment themes

Many respondents provided comments which did not fall within the key themes highlighted earlier in the report. For each open question, a full list of these themes and NLWA's response to these has been included below:

Additional themes: How would this proposal impact you if it were implemented?

Responses	Theme	NLWA Response
46	The journey to other sites is more difficult because of Low Traffic Neighbourhoods (LTNs) or other traffic management measures.	Officers will work with the responsible local authority for traffic management to share with them the views raised by respondents and to take these views into account when reviewing traffic management in the area.
45	It's a valuable site for the local area.	It is understandable that the site users appreciate the convenience of Gateway Road and the staff that work there. However, the nearest alternative site, South Access Road, is larger, has more capacity, and is able to recycle significantly more materials than Gateway Road.
41	Household collections do not take all materials or are not reliable enough.	NLWA will work with Waltham Forest and Hackney colleagues to explain the nature of respondents' concerns, with the aim of supporting service improvement in light of the responses received.
25	Would have to pay for household collections, or collections are too expensive.	NLWA will work with Waltham Forest and Hackney colleagues to explain the nature of respondents' concerns, with the aim of supporting service improvement in light of the responses received.
23	It would increase traffic levels.	While some residents being required to drive further could result in increased levels of traffic, due to the relatively low number of users of Gateway Road, it is not anticipated that there will be a significant impact on local traffic levels.
23	It's harder to travel to other sites due to disability.	NLWA is keen to ensure that the impact of a closure of Gateway Road on disabled people is minimised as much as possible. It is understandable that travelling to an additional site may be more difficult for those with disabilities, and we would encourage these users to get in touch with NLWA who will be happy to discuss options available to them in the event of a closure of Gateway Road.

21	Increased cost of further travel.	It is possible that travelling to an alternative RRC may incur a slightly higher cost, either through increased fuel usage or public transport costs. However, as noted in this report, for the vast majority of site users there is only a small additional journey required to reach South Access Road. As a result of this, the cost of travel is not expected to be significantly more expensive.
16	It would leave the south of Waltham Forest with no recycling facilities.	While a closure of a service is always regrettable and rarely seen as a positive by the residents who use it, it should be noted that there is currently a significant overprovision of Reuse and Recycling Centres within Waltham Forest, with two of these sites located in the south of the borough. If Gateway Road were to close, South Access Road, which has recently undergone significant improvement works, will remain to serve the south of Waltham Forest, and is only a short distance away from the Gateway Road site.
16	Hackney residents have fewer options available.	It is recognised that many Hackney residents use Gateway Road RRC, due to its proximity to the borough and that there is no RRC site provided within Hackney. However, it is the case for most site users in Hackney that travelling to South Access Road site requires only a slightly longer journey.
12	It would make other sites busier.	If Gateway Road were to close, there is expected to be an increase in usage of alternative sites. LondonEnergy, the operators of the RRCs near Gateway Road, have confirmed that there is sufficient capacity to handle additional users should Gateway Road close. Additionally, South Access Road has recently undergone significant improvement works which included increasing the capacity of the site.
10	Other sites aren't as good.	Gateway Road is restricted by both its shape and size to the extent the site offers only the basic service, and we have been unable to easily introduce the new recycling streams that are being offered across the network, including at South Access Road. Comments relating to the services provided at other sites will be shared with LondonEnergy, their operator, with the aim of supporting service improvement.
6	Closing the site would impact	NLWA will work with Waltham Forest to explore how local allotment holders could be assisted.
6	the holders of local allotments. Comment about the land Gateway Road occupies.	The land that Gateway Road occupies is entirely privately owned and consequently NLWA have no control over its future use. The London Borough of Waltham Forest have no ownership or control over the future use of the site other than in a planning capacity.
6	Closing the site would improve the area for local residents.	
4	Increasing population.	While the increase in population will result in more residents requiring the use of RRCs and other waste services, NLWA is confident that should Gateway Road close, there is sufficient capacity across the RRC network to manage increases in population for the foreseeable future. This includes the recent significant upgrade works at South Access Road to increase its capacity.
3	Why not close another site?	The rationale for the proposal to close Gateway Road was set out in the consultation and is summarised again in the beginning of this report.
1	Closing the site would drive up prices of local tradesmen who will need to travel further to dispose of waste.	Trade waste is not permitted to be taken to Gateway Road.
1	How will Hackney residents ensure that other local authorities will allow them to use their sites?	Hackney residents have access to the entire north London RRC network, regardless of the borough the site is in. This includes South Access Road, which is 1.9 miles away from Gateway Road.
1	Risk increased use of cheap and non-registered waste removal companies.	South Access Road RRC is a short drive away from Gateway Road, and usage of this site as well as all north London RRCs will remain free of charge as it has always been. As a result, there is no increased risk of residents using unregistered waste removal companies.

1	Driving further to an alternative site would be more difficult due to pregnancy.	For most residents, travelling to an alternative site is not expected to require a significant addition to their journey.
---	--	---

Additional themes: If Gateway Road Reuse and Recycling Centre were to close, are there any services which could be provided at other sites to reduce the impact on you?

Responses	Theme	NLWA response
16	Don't know.	
14	Nothing needs to be provided, South Access Road or other sites are a suitable alternative.	
8	Increase range of accepted materials.	The other north London RRCs already provides at least the same range of accepted materials as Gateway Road, and in most cases offer a significantly greater range of accepted materials. NLWA is constantly working with LondonEnergy to find ways of increasing the number of materials that can be recycled at north London RRCs.
7	Provide a site in Hackney.	It is recognised that many Hackney residents use Gateway Road RRC, due to its proximity to the borough and that there is no RRC site provided within Hackney. However, it is the case for most site users in Hackney that travelling to South Access Road requires only a slightly longer journey.
6	Increase capacity at other sites.	If Gateway Road were to close, there is expected to be an increase in usage of alternative sites. LondonEnergy, the operators of the RRCs near Gateway Road, have confirmed that there is sufficient capacity to handle additional users should Gateway Road close. Additionally, South Access Road has recently undergone significant improvement works which included increasing the capacity of the site.
6	Provide smaller local sites for certain items/materials.	NLWA will explore the potential to provide smaller sites for specific materials. There are a number of sites already provided by the Borough councils for items such as small electricals, and NLWA will work with borough colleagues to explore increasing this offering.

		South Access Road, the closest RRC to Gateway Road, offers more opening hours per week than Gateway Road.
5	Improve opening hours.	Gateway Road is open 8:30am to 4:30 pm Tuesday to Saturday, and 8:30am to 3:30pm on Sundays. Gateway Road does not open on Mondays with the exception of bank holidays. South Access Road, however, is open 7 days a week from 9am-4pm.
		While Gateway Road operates with restricted opening hours, because other RRCs in north London are not privately owned and operated, there is significantly more potential for NLWA to explore the potential of increasing the opening hours of the sites.
4	Improve customer service/staff assistance.	Comments relating to the services provided at other sites will be shared with LondonEnergy, the operator, with the aim of supporting service improvement.
4	Offer mobile RRCs/community skips.	NLWA will explore the potential to offer services such as mobile RRCs and community skips.
4	Provide transport to the nearest centre.	It is accepted that should Gateway Road RRC close, a number of RRC users would need to travel slightly further to reach an alternative site. However, due to the extensive RRC network provided in north London, including the South Access Road site, which is located just 1.9 miles away, there is not expected to be a significant addition to the majority of residents' journeys.
3	Ensure you don't need to book to use other sites.	Residents are no longer required to book at north London RRCs, with the exception of the temporary booking system in place for initial opening months of the Edmonton EcoPark RRC.
2	Allow people to use geographically close sites regardless of local authority.	NLWA will explore working with other local authorities to allow north London residents to use geographically close RRCs.
2	Increase fly-tipping enforcement.	The London Borough of Waltham Forest will continue to monitor and enforce fly-tipping.
2	Why isn't Kings Road being proposed to close instead?	The rationale for the proposal to close Gateway Road was set out in the consultation and is summarised again in the beginning of this report. As Kings Road isn't a privately owned and operated site, it is much easier to introduce additional recycling streams and circular economy activity, such as the Reuse Shop which has been successfully operating out of Kings Road for some time.
1	Accept more rubble per trip at other sites to minimise journeys.	NLWA will assess the possibility of doing this.
1	Improve accessibility by bike/walking/public transport.	Significant improvement works have taken place at both South Access Road and Hornsey Street RRCs, including making the sites easier to access for residents using the site on foot or by bike. The recently opened RRC at Edmonton EcoPark RRCs also offers dedicated facilities for pedestrians and cyclists.
1	Improve communication to residents on what can be collected at home and what can be taken to an RRC.	NLWA will continue to work with borough colleagues to explore ways of making more residents aware of the services available to them.
1	Improve ease of use of other sites.	Significant improvement works have taken place at both South Access Road and Hornsey Street RRCs, increasing their capacity, accessibility and usability. NLWA is committed to working with LondonEnergy on a consistent basis to improve the ease of use across the sites in north London.

1	Regular street clearing for fly tipping.	There is little evidence to suggest a small change to the RRC network would increase the incidents of fly-tipping. The RRC network across North London is enhanced when compared to previous years, and local service provided by Waltham Forest and the NLWA provide more opportunities for residents to manage w their waste from their doorstep. It is unlikely that a large number of residents that had or would have previously used Gateway Road would resort to fly-tipping on the basis that they had to drive or cycle a few extra minutes to reach an alternative site. However, officers from Waltham Forest will monitor the situation closely and take appropriate action should fly-tipping increase.
1	Reintroduce free compost to make increased journey worthwhile.	NLWA will explore the potential for providing this service.
1	Would be willing to pay to use site instead of travelling further.	NLWA have a legal duty to ensure that residents are able to access an RRC free of charge.

Additional themes: Is there anything else you would like to share about this proposal?

Responses	Theme	NLWA response			
232	Addressed elsewhere				
6	Consultation period seems short/wasn't well publicised.	The consultation period lasted six weeks, which is within good practice for local authorities and has ensured that residents have been given ample opportunity to respond. The consultation was advertised through NLWA and borough communications channels, as well as through targeted social media advertising. Additionally, signage was in place at Gateway Road throughout the whole consultation period and paper copies were available on site for users to complete.			
6	Many residents do not own cars	It is accepted that while the additional distance may be a short distance when driving, a further 1.9 miles may be difficult for residents who walk, cycle or use public transport to travel to the site. While NLWA understand that accessing an RRC may be more difficult for these residents should Gateway Road close, this is a very small proportion of site users, and this must be balanced with the significant increase in costs associated with keeping the site open.			
6	Why can't the council purchase/compulsory purchase the land to ensure it stays open?	Purchasing the land the Gateway Road occupies would come at a huge cost to the local authorities. In the face of increasingly pressured council budgets, this would not be a suitable option given that South Access Road is only a short distance away.			

6	Why isn't Kings Road being closed instead if it is used less?	The rationale for the proposal to close Gateway Road was set out in the consultation and is summarised again in the beginning of this report. As Kings Road isn't a privately owned and operated site, it is much easier to introduce additional recycling streams and circular economy activity, such as the Reuse Shop which has been successfully operating out of Kings Road for some time.
5	Consider charging to use the site instead of closing it	NLWA have a legal duty to ensure that residents are able to access an RRC free of charge.
5	Gateway Road will be needed to support the increasing population.	While the increase in population will result in more residents requiring the use of RRCs and other waste services, NLWA is confident that should Gateway Road close, there is sufficient capacity across the RRC network to manage increases in population for the foreseeable future. This includes the recent significant upgrade works at South Access Road to increase its capacity.
5	Why can't cost savings be implemented instead?	NLWA have explored the available options to maintain Gateway Road. However, all of these options will be subject to the increased cost of the site owner and operator.
5	Hackney residents are now required to pay for garden waste collection - closing Gateway Road would worsen the impact of this.	NLWA will work with Hackney colleagues to explain the nature of respondents' concerns, with the aim of supporting service improvement in light of the responses received.
4	Closing the site would make the area more pleasant for local residents.	
3	Closing the site would lead to a loss of jobs/negatively impact the local economy	The company that NLWA currently contracts to run Gateway Road have confirmed that if the site were to close, they have adequate vacancies within their wider operation to make suitable alternative offers of employment to all current Gateway Road colleagues.
3	What other options have been explored?	NLWA have explored the available options to maintain Gateway Road. However, all of these options will be subject to the increased cost of the site owner and operator.
3	What reason has been given for the increase in operating costs?	The operator of Gateway Road reserve the right to increase the cost of maintaining the site. As the current contract has come to an end, a new commercial arrangement to continue the service would see the costs of operating the site double. The existing agreement provided for rent-free occupation of the site. The operator has also indicated a market rent would be required to continue operation of the site.
2	Advertise Gateway Road better and more people would use it.	As it is part of our RRC network, information on Gateway Road is available to residents alongside the rest of north London's RRCs.
2	Closing the site makes the most financial sense.	As set out in the rationale for the proposal, NLWA believes that to maintain Gateway Road would represent poor value for money for residents.
2	Interested in what the cost savings of closing the site would fund.	Gateway Road is primarily funded by Waltham Forest and Hackney councils, and as a result the cost savings involved with a site closure would be factored into their budget-setting process.
2	Other services should be cut instead	There is an overprovision of RRCs in the borough of Waltham Forest. Should Gateway Road close, there will remain a network of eight RRCs across north London, two of which would be located in Waltham Forest.
2	South Access Road is not as easy to use	In the summer of 2024, NLWA invested in significant improvements at South Access Road to improve access and signage to enhance the user experience. NLWA is committed to continue working with LondonEnergy to improve the ease of use across the sites in north London.
1	Why can't the site accept commercial waste to support costs?	The company that owns and operates the site also offers a commercial waste service adjacent to the public RRC.

1	Closing the site could harm local animals	As Gateway Road is privately owned and operated, it would be the owner's responsibility to ensure that local wildlife is unharmed on their land.
1	Collections cannot be relied on - residents risk being fined for fly-tipping if they leave out items for collection and it does not get collected	NLWA will work with Waltham Forest and Hackney colleagues to explain the nature of respondents' concerns, with the aim of supporting service improvement in light of the responses received.
1	Consider asking Hackney council to contribute more to the costs of Gateway Road as it does not have an RRC of its own	It is recognised that many Hackney residents use Gateway Road RRC, due to its proximity to the borough and that there is no RRC site provided within Hackney. However, it is the case for most site users in Hackney that travelling to South Access Road site requires only a slightly longer journey.
1	Keep Gateway Road to serve the south of Waltham Forest, and turn South Access Road into a collection site that pays residents to bring bottles and tins	South Access Road is well located to serve the south of Waltham Forest, and as it is a council-owned site, the future of the site is not insecure as it is for Gateway Road due to it being privately owned and operated.

Appendix 1 – Consultation Survey



Consultation on the proposed closure of Gateway Road Reuse and Recycling Centre

Opens: 31 July 2024

Closes: 11 September 2024

Overview

The North London Waste Authority (NLWA) is the statutory Waste Disposal Authority for Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest, managing the waste and recycling of around 2 million residents in 847,000 households.

NLWA has a legal duty to treat, manage and dispose of waste collected by the borough councils from residents, and is therefore responsible for the recycling, composting, and disposal of this waste. Waste disposal authorities, including NLWA, also have the legal duty 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).

NLWA and the seven north London boroughs aim to deliver high-quality reuse, recycling, and disposal services. These services support residents to live more sustainably, at the lowest possible cost. For a long period of time, RRCs were the only option for residents to dispose of and recycle a number of material types and large amounts of waste. Since then, services have evolved, and in recent years the services available to residents have increased and improved significantly. This includes collections for a wider range of materials from the doorstep and alternative places to drop-off certain types of waste. Our reuse and recycling centres now accept a wider range of materials than ever before, and in July 2024 we opened a modern and fully equipped Reuse and Recycling Centre in Edmonton to offer an additional point of service for all north London residents. This brought the total number of RRCs in north London to nine, meaning that north London is provided with significantly more sites than other comparable areas.

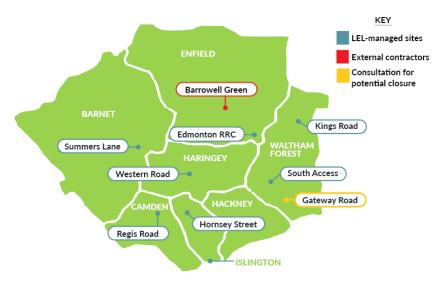
At the same time, NLWA and our boroughs are also being increasingly strained financially, as a result of reduced government funding and an increase in demand for some services. To manage these pressures, the NLWA needs to continually review the services we provide to ensure they meet the needs of residents at an affordable price.

Gateway Road Reuse and Recycling Centre in Waltham Forest is operated on behalf of NLWA by a private company called Bywaters Limited, which also owns the land where the site is. Discussions have been held with Bywaters on the costs of continuing the service in future, and these are likely to increase by over 115% compared to 2022/23.

Continuing to maintain the site at a significantly increased cost does not represent the best value for money for residents. Because of this, it is proposed that Gateway Road Reuse and Recycling Centre should be closed.

We want to hear your views on this proposal; to understand the impact it would have on your ability to reuse, recycle, and dispose of your waste.

Our Proposal



Across north London, there are currently nine Reuse and Recycling Centres, including the recently opened RRC at the Edmonton EcoPark. All residents living in the north London boroughs can use any of these sites.

By borough, these sites are:

Barnet: Summers Lane Camden: Regis Road

Enfield: Barrowell Green and Edmonton EcoPark RRC (opened July 2024)

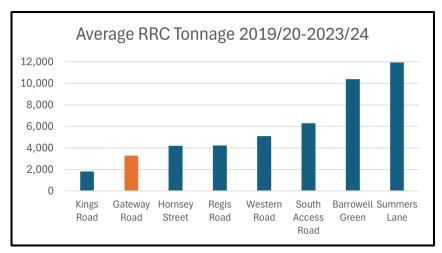
Islington: Hornsey Street Haringey: Western Road

Waltham Forest: South Access Road, Kings Road, and Gateway Road

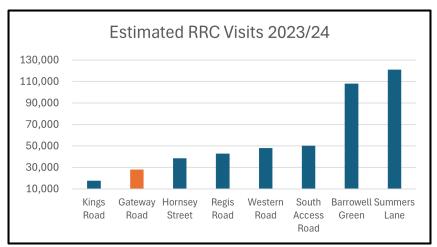
Eight of these RRCs are the responsibility of NLWA, of which seven are operated by NLWA's publicly owned company, LondonEnergy. Gateway Road is owned and operated by Bywaters Ltd who are an independent private contractor. One RRC, Barrowell Green, is the responsibility of Enfield Council and is operated by a private contractor.

A visitor survey conducted at Gateway Road in 2022 showed that most visitors are Waltham Forest residents, accounting for around 75% of site users. Hackney residents also make up a significant proportion of Gateway Road visitors, accounting for around 17% of site users.

The graph below shows the average amount of waste and recycling material received in a year over the last five years at north London RRCs. Tonnages (the amount of waste received, measured by weight) at each site have remained largely consistent over time, with Summers Lane in Barnet being the most used, followed by Barrowell Green in Enfield, and South Access Road in Waltham Forest. The two sites with the smallest amount of material received are also in Waltham Forest, with Kings Road receiving the lowest tonnage and Gateway Road receiving slightly more.



The graph below shows estimated site visits for the financial year 2023/24. NLWA estimate that Gateway Road received just under 30,000 visits. This represents the total number of visits across the year, rather than the number of individual residents that used the site.



The cost of operating Gateway Road is increasing significantly. Last year, it cost NLWA approximately £250,000 to run the site. This year the cost will more than double. This is just the cost of site operation and does not include the additional costs incurred for the disposal and transport of the waste and recycling. The increased operation cost is estimated to be equivalent to around £155 per tonne, compared with the average north London RRC cost of £114 per tonne.

Because Gateway Road is owned and operated by a private contractor, we do not have the same level of flexibility and control as the other RRCs in north London in regard to the services that are provided and how the space can be used. It also means that the future of the site cannot be guaranteed, for example if the contractor chose to close the site, offer fewer services, or further increase their costs.

The recent opening of the new RRC at Edmonton EcoPark means that were Gateway Road to close, the total number of RRCs in north London would remain at eight, consistent with the service level we have offered for many years. Waltham Forest currently has three RRCs in its borough, more than any London borough except Croydon. The proposed closure of Gateway Road RRC would save a significant amount of money and still leave the borough with two other RRCs at South Access Road and Kings Road. We have also undertaken significant works at South Access Road recently to improve the accessibility of the site, so it and is able to provide an even greater experience for residents.

Residents who's local RRC is currently Gateway Road would instead be able to use South Access Road which is approximately 1.9 miles away, taking a seven minute drive or eleven minute cycle from Gateway Road. For residents in Hackney who use Gateway Road and travel by bicycle to the site, it

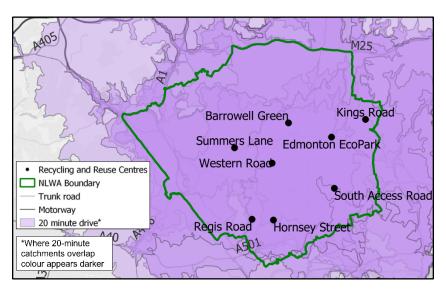
would take 18 minutes to cycle from Hackney Town Hall to South Access Road, which is an additional five minutes in the journey time to Gateway Road.

These residents would also, as is currently the case, continue to be able to use any other RRC in north London free of charge.

A comprehensive list of available services for residents to recycle and dispose of their waste is available through the dedicated webpage on the NLWA website:

www.nlwa.gov.uk/article/consultation-future-gateway-road-reuse-and-recycling-centre

Guidance from the Waste and Resources Action Plan (WRAP) suggests that all residents should live within a 20-minute driving distance from an RRC (according to local speed limits). The map below demonstrates that if Gateway Road were to close, all of the north London area would remain within a 20-minute drive of a Reuse and Recycling Centre.



Next steps

Upon completion of the consultation period, all responses will be thoroughly reviewed, resulting in an outcome report that will highlight and address any issues and impacts of the proposal that have been raised by respondents.

A decision on the future of Gateway Road Reuse and Recycling Centre, informed by this report, is expected to be taken by the Authority in September. If a decision is made for the site to be closed, it is expected that the site closure would take place in early November.

In order for the Authority to make a decision that fully takes into account the views of residents, your response to this consultation would be greatly appreciated.



Consultation on the proposed closure of Gateway Road Reuse and Recycling Centre

Opens: 31 July 2024

Closes: 11 September 2024

Your views on the proposal to close Gateway Road Reuse and Recycling Centre

Are	Are you							
	Responding as an individual							
	Providing the official response of an organisation, group or business							
	Responding as a democratically elected re Member, or a Member of Parliament)	epres	entative (e.g. a councillor, London Assembly					
	ou are providing the official response of cted representative, please provide detai		rganisation, group or business, or as an					
Are	you a resident of, or are you representing	ng, a	ny of the following London boroughs?					
	ou are providing the official response of an oresentative, please choose the area you are		isation, group or business, or as an elected ed in or are representing.					
	Barnet		Hackney					
	Camden		Haringey					
	Enfield		Waltham Forest					
	Islington		Other local authority (please specify below)					
			(please specify below)					
Hav	e you ever used Gateway Road Reuse a	nd R	ecycling Centre?					
	Yes		No					
Цол	v often do you use Gateway Road Reuse	and	Populing Control					
ПО		anu						
	Four times a year or more often	Ш	Around once a year					
	Around three times a year		Less than once a year					
	Around twice a year		Never					
Wha	What is your main method of transport to Gateway Road Reuse and Recycling Centre?							
	Car		Bicycle					

	Motorcycle		Public transport					
	Van		Walking					
	Other (please specify)							
Do	Do you use any other reuse and recycling centres? Please select all that apply.							
	South Access Road – Waltham Forest		Barrowell Green - Enfield					
	Kings Road – Waltham Forest		Edmonton EcoPark – Enfield					
	Hornsey Street – Islington		Summers Lane – Barnet					
	Western Road – Haringey		Regis Road – Camden					
	Other (please specify)							
Hov	w would this proposal impact you if it were	impl	emented?					
	It would have no impact on me							
	If Gateway Road Reuse and Recycling Centre were to close, are there any services which could be provided at other sites to reduce the impact on you?							

Wh	What are your views on the proposal to close Gateway Road Reuse and Recycling Centre?								
	Strongly agree								
	Agree								
	Neither agree nor disagree								
	Disagree								
	Strongly disagree								
	Don't know								
ls t	here anything else you would like to share	abou	it this proposal?						
Abo	out you								
For www	stions about you. All answers will remaisonal details. more information on NLWA's data protiv.nlwa.gov.uk/data-protection. but are responding on behalf of an organited representative, you do not need to	ectic	tion, group or business, or as an						
Wh	at is your postcode? (this will allow us to s	ee aı	reas where people are responding from)						
Wh	at is your age group?								
	15 or under		45-54						
	16-24		55-64						
	25-34		65-74						
	35-44		75-84						
	85 or over		Prefer not to say						
Wh	at is your sex?								
	Female		Male						
	Prefer to self-describe (please specify)	1							
	Prefer not to say								

ls ti	Is the gender you identify with the same as your sex registered at birth?						
	Yes		No		Prefer not to say		
100	4						
Wh	at is your sexual orientati	on?		ı			
	Bisexual		Gay/lesbian		Heterosexual/straight		
	Prefer to self-describe (ple	ease	specify)				
	Prefer not to say						
	you have any physical or months or more?	men	tal health conditions or i	llnes	ses lasting or expected to last		
	Yes, which reduce my abi	lity to	carry out my day-to-day a	ctiviti	es a lot		
	Yes, which reduce my abi	lity to	carry out my day-to-day a	ctiviti	es a little		
	Yes, but they don't reduce	my a	ability to carry out my day-t	o-day	/ activities at all		
	No						
	Prefer not to say						
Wh	at is your ethnicity?						
	Asian or Asian British						
	Black, African, Caribbean	or Bl	ack British				
	Mixed or multiple ethnic g	roups	3				
	White						
	Other ethnic group (pleas	e spe	ecify)				
	Prefer not to say						
Wha	at is your religion?						
Ш	Atheist/No religious belief	S					
	Christian						
	Buddhist						
	Hindu						
	Jewish						
	Muslim						
	Sikh						
	Any other religion (please	spec	cify)				
	Prefer not to say						

Appendix B

Consultation on the future of Gateway Road Reuse and Recycling Centre Equality Impact Assessment

What is the proposal?

North London Waste Authority is proposing to close the Gateway RRC in Waltham Forest for the following reasons:

- An overprovision of RRCs and waste services in north London and in the east of the Authority area in
 particular. Gateway Road is one of three RRCs in Waltham Forest, and one of two in the south of the
 borough. With the increase in services such as household collections and drop-off points for a wider
 range of materials, RRCs are no longer the only option for residents to dispose of and recycle various
 material types and dispose of large items of waste.
- Gateway Road RRC is operated on behalf of NLWA by a private company, Bywaters Limited, which also
 owns the land the site occupies, meaning the Authority has little control over the future use of the site.
- The site is constrained by a lack of space and so is only able to provide a basic service and it is more
 difficult to introduce the new recycling and circular economy activities that are being offered across the
 network.
- The cost of operating Gateway Road is increasing significantly. Discussions with Bywaters suggest that the cost of continuing the service in future are likely to increase by over 115% compared to 2022/23, not including the costs of disposal and transport of the waste and recycling.

Who is affected by the proposal?

RRCs are a universal service providing places for all residents to recycle and dispose of their waste, and so the closure of the Gateway Road facility would affect all residents who use this site. Guidance from the Waste and Resources Action Plan (WRAP) suggests, with some exceptions for very rural or very urban areas, that everyone should live within a 20-minute driving distance of an RRC according to local speed limits. If Gateway Road were to close, all residents in north London would be within a 20-minute drive of a Reuse and Recycling Centre.

The purpose of this Equality Impact Assessment is to assess the impact of the decision on different groups, identify any adverse impacts and where possible remove or mitigate them.

How impact have been assessed

Neither NLWA nor Bywaters collect data about protected characteristics from site users, and so the assessment is based on:

- The latest Census conducted in 2021, which provides data on protected characteristics down to a post code area.
- The public consultation on closure in which the 730 respondents were invited to both identify any protected characteristic and comments on how the proposal might affect it.

The Assessment has been produced following advice from Camden and Waltham Forest equality teams to ensure it follows best practice.

Demographic data

Age

As set out below, more residents aged between 35-74 responded to the consultation than the distribution both locally and nationally.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England	
Average of 16- 24	0.41%	11.9%	12.6%	12.3%	11.7%	
Average of 25- 34	10.27%	21.4%	19.5%	18.3%	13.6%	
Average of 35- 44	23.56%	17.2%	16.0%	15.9%	13.0%	
Average of 45- 54	21.78%	12.5%	13.0%	13.4%	13.3%	
Average of 55- 64	21.78%	9.5%	10.2%	10.5%	12.5%	
Average of 65- 74	14.93%	5.3%	6.2%	6.7%	9.9%	
Average of 75- 84	2.33%	2.7%	3.5%	3.8%	6.1%	
Average of 85 or over	0.14%	1.1%	1.4%	1.6%	2.4%	
No answer	4.38%					
Source: 2021 Census						

Disability

Around 24% of respondents said that they had a physical or mental health condition or illness lasting or expected to last 12 months or more. Of these, 6.8% said that their condition significantly impacted their ability to carry out their day-to-day activities.

	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
Disabled under the Equality Act	13.8%	14.1%	13.2%	17.3%
Not disabled under the Equality Act	86.2%	85.9%	86.8%	82.7%
Source: 2021 Census				

Do you have any physical or mental health conditions or illnesses lasting or	Consultation	
expected to last 12 months or more?	Respondents	
Yes, which reduce my ability to carry out my day-to-day activities a lot	6.8%	
Yes, which reduce my ability to carry out my day-to-day activities a little	11.4%	
Yes, but they don't reduce my ability to carry out my day-to-day activities at all	5.6%	
No	59.7%	
Prefer not to say/No answer	16.4%	

Ethnicity

A significant number of respondents chose not to answer this question, making it more difficult to understand how the proposal might impact different groups, but from the responses received, it appears that whilst white respondents were over-represented compared to the local population, all other ethnicities were underrepresented.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
Asian or Asian British	7.4%	14.8%	14.0%	19.8%	9.6%
Black, Black British, Caribbean or African	5.9%	18.0%	14.6%	12.6%	4.2%
Mixed or Multiple ethnic groups	3.8%	6.6%	6.5%	5.7%	3.0%
White	59.6%	53.4%	56.3%	55.6%	81.0%
Other ethnic groups	0.5%	7.2%	8.6%	6.3%	2.2%
Not answered	21.8%		_		•
Source: 2021 Cens	sus	·			·

Religion or belief

A significant number of respondents chose not to answer this question, making it more difficult to understand how the proposal might impact different groups. However, it appears that whilst non-religious respondents were over-represented, all other religious groups were under-represented.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
No religion	38.1%	32.2%	30.2%	28.2%	36.7%
Christian	23.4%	35.0%	36.9%	40.7%	46.3%
Buddhist	0.1%	0.8%	0.9%	0.9%	0.5%
Hindu	0.27%	1.3%	2.2%	4.8%	1.8%
Jewish	1.1%	3.7%	4.6%	1.6%	0.5%
Muslim	5.62%	17.1%	15.2%	14.3%	6.7%
Sikh	0.4%	0.6%	0.4%	1.5%	0.9%
Other religion	0.6%	1.5%	1.7%	1.0%	0.6%
Not answered	30.4%	7.8%	7.9%	7.1%	6.0%
Source: 2021 Census					

Sex

There were more female respondents than male respondents. Whilst this is also the case in the wider population, there is a more pronounced difference in the consultation respondents.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
Female	47.1%	51.6%	52.0%	51.4%	51.0%
Male	41.2%	48.4%	48.0%	48.6%	49.0%
Not answered	11.5%				
Source: 2021 Ce	nsus				

Sexual Orientation

A significant number of consultation respondents chose not the answer this question, making it more difficult to understand how the proposal might impact different groups. However, it appears that gay and lesbian people were over-represented relative to the local and national population.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
Straight or Heterosexual	59%	82.5%	84.2%	86.0%	89.4%
Gay or Lesbian	6.6%	3.2%	2.8%	2.4%	1.5%
Bisexual	1.5%	2.2%	1.9%	1.5%	1.3%
All other sexual orientations	0%	0.8%	0.7%	0.5%	0.3%
Not answered	32.9%	11.4%	10.4%	9.5%	7.5%
Source: 2021 Census					

Gender reassignment

Compared with the population, there was a smaller proportion of consultation respondents who said their gender identity was different from their sex registered at birth.

	Consultation Respondents	Hackney and Waltham Forest	All north London Boroughs	All London Boroughs	England
Gender identity the same as sex registered at birth	84%	89.7%	90.4%	91.3%	93.5%
Gender identity different from sex registered at birth	0.5%	1.1%	1%	0.9%	0.5%
Not answered	15.5%	9.2%	8.5%	7.8%	6.0%
Source: 2021 Census					

Assessment

Travelling to an alternative RRC

It is likely that elderly residents, those who are pregnant or have a disability may find it more difficult to visit an alternative RRC where this involves a longer travelling distance, or where a resident has to rely on others to assist them. There were 14 comments which mentioned age, including the difficulty in travelling longer distances when elderly and frail, and in heavy traffic.

Respondents also cited age-related financial constraints as reasons for being unable to use alternative services, including being unable to afford the fees for garden waste collection.

One respondent felt alternative services, such as arranged collections for larger items, would be disruptive as items left on pavements for long periods could cause obstructions, and impact disabled/elderly/pushchair users.

In relation to pregnancy and maternity, one respondent advised that driving would become more difficult as their pregnancy progressed.

Response

As the vast majority of Gateway Road users access the site by car, some residents accessing an alternative facility such as South Access Road will require a slightly longer journey. Those residents for whom there is a longer journey who have a disability, are elderly or pregnant are likely to be further impacted.

This impact has to be set against the significant increase in cost involved in keeping Gateway Road open, and the poor value for money that this would represent.

It should also be noted that there are also a number of drop-off points and collection services depending on the material that needs to be recycled or disposed of. A list of the available options will be published should Gateway Road close, in order to mitigate the impact noted above.

Risk of possible increase in fly-tipping

An increase in fly-tipping could impact on younger residents, older residents, and those with a disability.

Response

There is little evidence to suggest that RRC closures result in incidents of fly-tipping, and so it is unlikely that this possible impact will materialise.

Financial impact

Although not a protected characteristic under the Public Sector Equality Duty, consideration has been given to the potential financial impact of the closure on low-income residents and families.

There were 43 comments in relation to personal finances, including inability to afford a garden waste or bulky waste collection service vs alternatives and highlighting the additional costs of longer travelling distances.

Response

Green and bulky waste are accepted across the whole of the north London RRC network, so residents can take these items to alternative sites free of charge. As previously mentioned, the next nearest site for residents would only involve some of them travelling a very short additional distance, so should result in very minor additional costs). Additionally Hackney Council offer a free bulky waste collection service to residents on benefits.

While accepting that those in low incomes may be impacted, as above this has to be set against the significant increase in cost involved in keeping Gateway Road open, and the poor value for money that this would represent.