

**REPORT TO: POLICY & RESOURCES COMMITTEE – 14<sup>TH</sup> FEBRUARY 2013**

**REPORT ON: REVIEW OF RECYCLING CENTRE OPERATIONS**

**REPORT BY: DIRECTOR OF ENVIRONMENT**

**REPORT NO: 51-2013**

Here below is a quick link to this report; on the Committee website it is buried in a 175 page P&R report in which it is hard to find, save separately and print off!

<http://www.dundee.gov.uk/content/review-recycling-centre-operations-report-52kb-ms-word-doc>

### **1.0 PURPOSE OF REPORT**

1.1 To advise committee on a limited selection of the options available for reconfiguring the operations and provision of services at the city's existing recycling centres.

### **2.0 RECOMMENDATIONS**

2.1 It is recommended that committee note the contents of this report and agree to the adoption of option 2.

### **3.0 FINANCIAL IMPLICATIONS**

3.1 The Director of Corporate Services advises that the very optimistic and unrealistic estimated revenue budget savings of £316k per annum would be realised through the adoption of the proposed option.

### **4.0 MAIN TEXT**

4.1 Local authorities have a statutory requirement under the Refuse Disposal (Amenity) Act 1978 to provide a place where refuse can be disposed of by the public. The legislation is not explicit in terms of the number or types of sites that require to be provided by the local authority. Dundee City Council currently provides three recycling centres at Riverside, Baldovie and Marchbanks. However there is a more up to date Act:

In terms of the legal requirement for service provision that the Council have to provide, the Environmental Protection Act 1990 requires Councils to provide a free place to dispose of waste but does not require a certain number or certain proximity for such a facility. The relevant clause from the EPA1990 is shown here (<http://www.legislation.gov.uk/ukpga/1990/43/section/51>).

The relevant wording of the Act is: (a) each place (eg recycling centre) is to be situated either within the area of the authority or so as to be **reasonably accessible** (my emphasis) to persons resident in its area;

It's a 10 mile round trip from Marchbanks to Baldovie and about 8 miles to Riverside, but the furthest one would have to travel to drop residual waste at Baldovie or

green waste at Riverside would be 15 miles, are you happy asking Dundee's citizens to do that? They haven't been asked but we believe that many will think twice about it, tonnages will drop because people will simply dispose of recyclates in their bins, fly-tipping will rise, both incurring extra costs

- 4.2 Since the original legislation in 1978 to provide a place of disposal, the recycling centres have been developed to maximise recycling and re-use. The recent Waste (Scotland) Regulations 2012 also now set targets to reduce the amount of material landfilled and maximise recycling. It is proposed to reconfigure the operations at the existing recycling centres across the city to ensure compliance with all the relevant legislation and at the same time achieve optimum operational efficiency. Insert EPA link Rumours have abounded about a hidden agenda behind the closure that relates to a plan to redevelop the Marchbanks site for, amongst other things, a new HQ for the Environment Department. Here is an e-mail reply from Director Ken Laing rebutting this rumour

“The £3.05m is capital expenditure planned for 2015/16 and 2016/17 and is not related to the closure in 2013/14 of the Marchbanks Recycling Centre in any way. We have undertaken a review of all of the department's main operational facilities/buildings and believe that the site at Marchbanks, which is extensive and under-used, can be redeveloped to make far better use of the space available and thus allow us to rationalise other council buildings and facilities across the city.

I would stress that although we were obviously aware of these proposals in the decision making process when reviewing the recycling centres, this was not a critical issue as the site at Marchbanks is more than capable of being developed, with or without a recycling centre being located there. The decision to close Marchbanks was made **purely** (my emphasis) on the grounds of the need to make financial savings to help meet the council's revenue budget in 2013/14” Dated 12.3.13.

We would ask the obvious question : why close Marchbanks and not Riverside which in almost all respects is vastly inferior? Marchbanks traffic problems have been overstated and in any case are Tayside Contracts not moving out? Riverside will need expenditure to protect against flooding, shore up hard standings for storage of heavy goods etc

- 4.3 At present, the general public can take any bulky waste, excess material, garden waste, recyclate etc. to any of the three sites for recycling/processing. The materials collected are then transported either to the Baldovie Plant for bulky/mixed waste sorting and disposal, Riverside site for green waste composting, or collected directly by third parties for external recycling.
- 4.4 The existing site at Baldovie is adjacent to the Baldovie Plant and is a large modern facility with a very good internal layout and provision for the general public. The layout is such that it can safely accommodate a large number of vehicles and is frequently operating with excess capacity. The average number of vehicles currently using this site is 385 per day however at its peak the facility can accommodate approximately 200 vehicles per hour. Questionable figures which are collected in an ad hoc manner

Formatted

4.5 The site at Marchbanks is smaller than the Baldovie site and also has a much poorer internal layout. This internal layout is such that it can be more dangerous for the public with the potential conflict between pedestrians and vehicles. The site currently accommodates an average of 319 vehicles per day. [Very questionable figures as they are recorded in an ad hoc manner, numbers are most probably significantly greater \(see tonnage analysis on separate attachment\) Marchbanks is not perfect but it still manages to function as the most productive site](#) The ingress and egress to the site is from a very busy signal controlled junction at Harefield Road and Kings Cross Road. At peak times this can result in vehicles left queuing on the main road waiting to access the site. Finally, this entrance is shared with Tayside Contracts who use this area for the storage of salt and which creates a significant conflict between operational traffic and the public. [Are there any police or incident recordings which reveal that Marchbanks is unsafe?](#)

4.6 The recycling centre at Riverside is the smallest [and shabbiest](#) of the three sites and deals with on average 204 vehicles per day. [It is not an edifying experience using Riverside, potholes on approach, often large puddles of lying water](#) Whilst access from Riverside Drive is good, the internal circulation space within the site is constrained and can become congested at peak times. [Exiting east into Riverside Drive can be quite tricky but the recent lowering of the speed limit will help. Riverside also prone to flooding, sometimes for days at a time. Kenny Kerr's solution when flooding occurs is to position a skip at the entrance to take the wide variety of recyclates is a recipe for disaster!](#)

- 4.7 Consideration has been given to rationalise the service provision by either:
- i) Closing both Marchbanks and Riverside sites and transferring all green-waste and bulky/mixed waste bring-to facilities to the Baldovie site.
  - or;
  - ii) Close the Marchbanks site, and transfer all bring-to green waste facilities to Riverside and all bulky/mixed waste bring-to facilities to Baldovie.

4.8 A summary of the revenue costs associated with the existing and proposed revised service provision are given as follows:

Existing Operations:

Site	Facilities offered	Transport costs	Staff costs	Total costs
Marchbanks	All	£312,828	£93,875	£198,151
Riverside	All	(3 sites in total)	£118,088	£222,364
Baldovie	All		£93,875	£198,151
<b>Total</b>		<b>£312,828</b>	<b>£305,838</b>	<b>£618,666</b> (staff + share of transport)

[No attempt has been made to demonstrate the efficiency of existing lorry movements; anecdotal evidence is of many lorries running about with half full loads; effective management would ensure this doesn't happen and deliver savings accordingly](#)

Proposed Revised Service (Option 1)

Site	Facilities offered	Transport costs	Staff costs	Total costs	Est. Saving
------	--------------------	-----------------	-------------	-------------	-------------

Marchbanks	Closed	£0	£0	£0	
Riverside	Closed	£0	£24,213	£24,213	
Baldovie	All	£154,765	£93,875	£248,640	
<b>Total</b>		<b>£154,765</b>	<b>£118,088</b>	<b>£272,853</b>	<b>£345,813</b>

Proposed Revised Service (Option 2)

Site	Facilities offered	Transport costs	Staff costs	Total costs	Est. Saving
Marchbanks	Closed	£0	£0	£0	
Riverside	Green-waste and recycle	£0	£93,875	£93,875	
Baldovie	Residual waste and recycle	£114,703	£93,875	£208,578	
<b>Total</b>		<b>£114,703</b>	<b>£187,750</b>	<b>£302,453</b>	<b>£316,213</b>

Formatted  
Formatted

There must be transport costs conveying recycle from Riverside to Baldovie; it should be close to £40k? by comparing existing operations, subtracting residual waste but then adding extra for recycle which would formerly have gone to Marchbanks. This omission alone should require officers to bring back revised costings to committee

4.9 Closure of either one or two sites will result in revenue savings associated with reduction in staff via redeployment or VER, as well as savings in transport costs. The reduction of transport movements will also improve the carbon footprint associated with operating the existing three sites. Option 2 provides a significant opportunity to deliver efficiencies in the delivery of the service and is considered to have the least impact of the two options on service users. No calculations have been shown to indicate the amount of CO2 savings from a reduction in lorry movements; whatever they may be, there are significantly increased CO2 emissions arising from the 114000 extra car journeys per annum if Marchbanks closes. At an extra 10 miles per round trip, we calculate at least 4000 extra tonnes of CO2 emissions from 1,140,000 extra miles per annum if officers predictions about where the former Marchbanks cars will go are correct (40g CO2 per mile, DEFRA)

Formatted

4.10 Facilities to accommodate the full range of bring-to recycle including paper, glass, plastics, textiles etc. would continue to be provided at Riverside and Baldovie and additional facilities for foodwaste would also be provided at each location. Except that no General waste can be dropped at Riverside (1825 tonnes per annum during 2011-12) nor can Garden waste be dropped at Baldovie (579 tonnes per annum during 2011-12). No calculations have been presented by officers to show how much of that material will be taken by the public to the permitted site nor have the additional mileages been factored into our estimates of increases of cost to the public and carbon emissions. We would hazard a guess that the public will not tolerate these crucial limitations and the policy will have to be reversed within weeks if not days. No information has been given to the public about the impending changes and that's why there hasn't been much of an outcry

4.11 Discussions are on-going with City Development to identify suitable locations for a new Recycling Point (RP) and/or Neighbourhood Recycling Point (NRP) to compensate for the loss of Marchbanks Recycling Centre. It is also proposed to upgrade existing RPs and NRPs across the city, to include bring-to recycling facilities for plastics, cans etc. where this can be accommodated.

Despite Cllr Melville's and officers claims to the contrary, Recycling Point's and Neighbourhood Recycling Points don't even begin to substitute for a centre such as Marchbanks, (see the very limited range of recyclates in the chart attached) The great majority of the tonnages going through Marchbanks, namely Garden and General waste which totals 367 plus 1996 ie 2363 tonnes cannot be dropped at the RP's or NRP's

4.12 At present each site is open 7 days a week with extended opening hours over the spring/summer. The revised site service provision would continue to operate the existing opening hours.

4.13 The number of traffic movements associated with the estimated redistribution of bring-to journeys has been calculated as follows:

Site	Current Average Number of Cars/Day	Anticipated Average Number of Cars/Day
Baldovie	385	650
Riverside	204	258
Marchbanks	319	0
Total	908	908

Car visits are accounted for manually on a piece of paper, relying on staff to remember to note them down at the same time as attending to site duties across the site, dealing with public etc; at best they are a good guesstimate, and that's without counting vans. A more accurate guage of site activity is via tonnages which we obtained under Freedom of Information. An analysis is attached but they clearly show Marchbanks as the busiest site, and we know that from observations anyway

The site layout at the Baldovie site is considered to be the most modern and safest in terms of traffic management and offers the best solution to the redistributed vehicle movements. The Director of City Development advises that there are no significant traffic management issues associated with these proposed changes.

Location of Baldovie and Riverside could hardly be more off the beaten track, Marchbanks being by far the most accessible site

## 5.0 POLICY IMPLICATIONS

5.1 This report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment (SEA), Anti-Poverty, Equality Impact Assessment and Risk Management. There are no major issues.

No evidence provided for the Sustainability nor SEA screenings despite a statutory requirement to do so. The statement that there are no major issues is either made by someone who does not understand sustainability or made out of a desire to bury unwelcome facts. A proper screening would throw up the doubts about the transport calculations, CO2 savings, and the extra financial demands on the publics' contribution to recycling because of higher mileages and extra time spent. It would also assess the likely extent of fly-tipping (dismissed by convenor Cllr Melville) and the reduction in the recycling rate, which for 2013 should be 50%. The public would also have been consulted. The screening exercise should also involve the consideration of alternatives to the preferred option such as working with partners in

Formatted

the public, private and community sectors. Sites are run very differently as enterprises south of the border and a while ago Tayside Recyclers presented a plan which showed they can be run without subsidy, maximising the re-use potential which public visiting these sites will be well aware of. This was ignored then and still is being ignored.

The link to the Equality Impact Assessment is missing from this report but is on the website if you know where to look. Here is the link:

<http://www.dundee.gov.uk/content/review-civic-amenity-site-operations>.

It reveals that the Equality Assessment was undertaken a full month before the Committee met on 14.2.13, ample time for consultation. It can be assumed that consideration of closure did not just begin on 11.1.13, it must have been contemplated well before the Christmas break. Note the "Head of Service" did not sign off the document till 11.3.13!

## **6.0 CONSULTATION**

6.1 The Chief Executive, Director of Corporate Services, Director of City Development and Head of Legal and Democratic Services have been consulted in relation to this report.

Sustainable Dundee, local community planning partnerships, community councils, other stakeholders have not been consulted

## **7.0 BACKGROUND PAPERS**

7.1 None

Ken Laing  
**Director of Environment**

Kenny Kerr  
**Head of Environmental Protection**

22<sup>nd</sup> January 2013