

4 October 2015

working locally and nationally to  
protect and enhance a beautiful,  
thriving countryside for everyone to  
value and enjoy

## **Household Waste Recycling Centre Strategy Consultation - Response by CPRE Oxfordshire, Sept 2015**

The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) is a registered charity which exists to protect and promote the landscape and rural communities of the county. We are affiliated to the national CPRE but entirely dependent on local supporters and members.

Recycling in Oxfordshire has been a success story over recent years, setting high standards for others to follow. Indeed, it is less than a year since Defra named Oxfordshire as the 'best performing county council for household waste per head'.<sup>1</sup> It would therefore be particularly disappointing if this success were undermined by a Strategy that leads to a reduction in recycling rates. Unfortunately we fear this may be where we are headed.

### **CPRE Oxfordshire's concerns in relation to the proposed Strategy are:**

- The lack of consideration given to the likely growth in demand resulting from the dramatic increase in household numbers proposed across Oxfordshire.
- The absence of statistical information to justify the strategy.
- The potential increase in traffic as a result of the proposed closures, which could particularly impact on rural communities.
- The risk of an increase in fly-tipping, with the resulting negative visual impact on the landscape.
- The need for further consideration of some form of charging mechanism.

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<sup>1</sup> <https://www.oxfordshire.gov.uk/cms/news/2014/dec/oxfordshire-leads-way-recycling>

## **1. Growth in demand resulting from increased household numbers**

Growth targets for the county, supported and agreed by Oxfordshire County Council, envisage a 40 per cent increase in the number of houses in the County by 2031 (based on 2014 figures). That means 100,000 extra households generating waste and feeding in to the recycling system. There is no evidence that adequate consideration has been given to how this extra demand will be accommodated.

CPRE welcomes recent developments in kerbside collection of items, such as the Vale and South Oxfordshire's introduction of kerbside collection of small electric items. However, any reduction in volume of material arriving at recycling centres is likely to be completely outweighed by the growth in overall household numbers.

## **2. The absence of statistical information to justify the proposed Strategy**

Within the consultation there are no statistics relating to:

- The tonnages of waste that are currently being collected
- The potential future tonnages to be collected
- Where this waste is being collected from
- What type of waste is being collected.

In addition, we are told that the County wishes to re-align the sites to the areas of planned population growth, but is not clear about where these are or the anticipated level of growth.

There is no indication of the costs of expanding existing sites or developing new sites.

All this information is essential in order to establish the most logical sites for HWRCs and whether this is a sound Strategy. Without it, we are forced into generalised responses and cannot comment on specific site proposals.

## **3. Increase in traffic**

Reducing the number of centres will inevitably mean longer journeys for the majority of Oxfordshire residents and a likely increase in carbon emissions. For example, instead of a six mile return trip to Oakley Wood, residents of Wallingford would face a 24 mile return trip to Redbridge or a 21 mile return trip to Drayton (assuming these remain open). Witney residents will face a 28 mile return trip, around the Oxford ring-road, to Redbridge, a journey that is likely to take well over an hour.

Oxfordshire County Council is currently pursuing the introduction of a remote Park & Ride Strategy, including closure of the Redbridge Park & Ride, with a view to decreasing the amount of traffic congestion on the Oxford ring-road. It therefore seems illogical to be pursuing a policy that would encourage more traffic to the Redbridge HWRC.

#### **4. The risk of an increase in fly-tipping, with the resulting negative visual impact on the landscape.**

It seems likely that such a dramatic reduction in the number of HWRCs will lead to an increase in fly tipping. We note that the County Council will ‘work closely with the city and district councils to manage any increase in fly-tipping’. Surely we should be working to decrease fly-tipping, not managing its increase?

We note the comments that the closure of Dean Pit did not lead to a demonstrable rise in fly-tipping, but residents still have comparatively easy access to the HWRCs at Alkerton and Stanton Harcourt. Closure of these sites, and others, is likely to have a far more significant impact.

CPRE does not believe that it is acceptable to pursue a strategy that deals less effectively with waste and does not save taxpayers’ money but merely passes the cost from the County Council to the City and District Councils and/or private landowners.

We note that the estimated cost of clearance of fly-tipping to Local Authorities in England in 2013/14 was £45.2 million, a 24 per cent increase on 2012/13.<sup>2</sup>

The majority of fly-tipping incidents, 66 per cent in 2013/14, are related to household waste.<sup>3</sup>

As the National Fly-Tipping Prevention Group explains, fly-tipping is a problem because:

- It costs an estimated £86m-£186 million every year to investigate and clear up. This cost falls on taxpayers and private landowners.
- Fly-tipping poses a threat to humans and wildlife, damages our environment, and spoils our enjoyment of our towns and countryside.
- Fly-tipping undermines legitimate waste businesses where illegal operators undercut those operating within the law. At the same time, the reputation of legal operators is undermined by rogue traders.
- As with other things that affect local environment quality, areas subject to repeated fly-tipping may suffer declining property prices and local businesses may suffer as people stay away.<sup>4</sup>

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<sup>2</sup> <http://www.tacklingflytipping.com/keystatistics/1494>

<sup>3</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/400928/Flycapture\\_201314\\_Statistical\\_release\\_REVISED.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400928/Flycapture_201314_Statistical_release_REVISED.pdf)

<sup>4</sup><http://www.tacklingflytipping.com/aboutflytipping/1474>

## **5. The need for further consideration of some form of charging mechanism.**

We note that there have been some calls for the introduction of minimal charges per visit to make up the funding shortfall, but that this is currently not allowed. Even were this situation to change, we would still have some concerns about charging as even a small fee may then deter those most likely to resort to fly-tipping. However, it would be sensible to investigate this option further and establish what evidence there might be to support it and the feasibility of a change in the law.

## **6. Other considerations**

If, despite the above concerns, the County is determined to press ahead with this strategy, we would note the following:

- a) The stated need is to save £350,000 pa, with the intention therefore to shut 3-4 sites. Line 2 of Annex 1 indicates that £300-£450k savings could be achieved by shutting 2-3 sites. Therefore, even on this basis, it would seem that an absolute maximum of 3 sites need to be considered for closure.
- b) All other considerations aside, we would generally be in favour of expansion of existing sites rather than seeking new locations, as the sites are already established and to the large part accepted by the local communities.
- c) We welcome the County Council's proposals to consider generating income from reuse of materials.

Yours sincerely

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