

Cheltenham Borough Council

Cabinet – 26 November 2024

Review of Waste and Recycling

Accountable member:

Councillor Izaak Tailford, Cabinet Member – Waste, Recycling and Public Realm

Accountable officer:

Gareth Edmundson, Chief Executive

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The responsibility for waste and recycling in Gloucestershire is divided between District Councils and the County Council. By law, Cheltenham Borough Council (CBC) is the Waste Collection Authority responsible for collection from residents' homes, whereas Gloucestershire County Council (GCC) is responsible for disposing of the waste that is collected. This includes operating Household Recycling Centres (HRCs).

At present, GCC operate five HRCs across the county. The nearest GCC operated HRC to Cheltenham is located at Wingmoor Farm near Bishop's Cleeve, approximately three miles away. However, for many years CBC has provided an additional, discretionary HRC located at the depot in Swindon Road at a cost of approximately £614,199 this year to operate. Historically this site was used by circa 1000 cars per day but in the last year this has reduced to 400-450 cars per day. The site at Swindon Road does not accept the same range of materials that can be taken to a GCC facility so cannot be classed a full household recycling centre.

At present, CBC's Swindon Road HRC operates under a special exemption to the rules and regulations set by the Department of Environment, Food and Rural Affairs

(DEFRA) and the Environment Agency (EA). The exemption is attached to CBC and Ubico's main permit covering the rest of the Swindon Road Depot which operates the household bin collection service.

In recent years the amount of legislative and regulatory change and new guidance relating to waste and recycling has been significant. Additional measures to increase environmental protection have been introduced by DEFRA and the EA, including the need to reduce the amount of waste and recycling that is generated. CBC must comply with any new legislation or regulations that are introduced, this includes funding any changes to ensure we continue to meet required standards.

The Environment Agency are introducing upcoming changes to their rules that will directly affect the Swindon Road HRC. These changes will mean that CBC will need to apply for a new, more stringent permit than that under which the Swindon Road HRC currently operates.

Specialist advice and quotations have been sought and it is estimated that approximately £1million will need to be spent on the Swindon Road HRC in the next financial year in order for an application for a new permit to be successful. The changes that would be required include significant groundworks to be completed and the introduction of a new concrete pad on the site. Completing the works would require a prolonged closure of the site to allow for construction. Without a new permit the EA will not allow the site to continue to operate.

Over the last few years, significant housing growth has taken place in Cheltenham and Gloucestershire. More homes require more vehicles to collect higher levels of waste and recycling. Collecting from more households has placed further pressure on the existing Swindon Road Depot, and CBC, in partnership with Tewkesbury Borough Council (TBC), is exploring alternative options for depot facilities, including full relocation, that will provide both councils with enough capacity to meet the waste collection demands of more and more households.

CBC has also faced significant and long-term reductions in central government funding that has not been replaced by CBC's share of council tax or business rates. As such, the council has had to make difficult decisions to protect key services while also trying to act as prudently as possible to capitalise on every available efficiency to deliver greater value for money.

The combination of new environmental compliance, future depot capacity and ongoing financial challenges places the existing Household Recycling Centre service at Swindon Road at an important crossroads. With the potential need to identify and develop an alternative depot site in the medium term to replace Swindon Road, investing circa £1m in necessary upgrades in the HRC just to remain operational for possibly a temporary period does not represent good use of taxpayer's money. In addition, CBC's first priority has to be delivering those council services which we are

by law responsible for. Therefore, CBC's focus has to remain on delivering a high quality and expanded waste and recycling collection service rather than an HRC which GCC are responsible for delivering. Over the past two decades, CBC has hugely expanded its kerbside recycling service. In addition to collecting regular items such as glass, plastic and cans, CBC now collects everything from coffee pods and textiles to small electrical items and batteries. Anecdotally, this expanded service offer has correlated with a reduction in traffic from Cheltenham residents to the Swindon Road HRC.

In this context, CBC is recommending a prolonged closure of the Swindon Road HRC while it undertakes a full options appraisal of both the future of the HRC and the wider depot site at Swindon Road with a view to reporting back to Cabinet by June/July 2025 at the latest.

This options appraisal will include but is not limited to:

- Exploring the long-term future and location of the Swindon Road Depot to meet CBC residents' long term needs.
- Approaching GCC as the responsible council for the provision of HRCs to explore how Cheltenham residents' needs with regard to an HRC service can be met.
- Finalise costs, options, and any further surveys on site to explore whether a cost effective HRC offer can be provided on the site.
- Undertaking consultation and engagement, including engaging with CBC's Overview and Scrutiny on the future of waste and recycling need.

To undertake this options appraisal this report sets out that the prolonged closure of the HRC will start from 10 January 2025. CBC cannot set any re-opening date for the site or bring forward any further proposals for the future of the service until this work has been undertaken.

Commercial Waste Service - The Council operates a small commercial waste service, however the legislative changes required by the Environment Act 2021 are likely to necessitate significant investment in this service, both in terms of officer time and financially, with no likelihood of recovering our expenditure due to the competitive nature of the market.

There are many providers of commercial waste and recycling services in the area who are likely to be better placed to meet the new requirements of the Environment Act 2021 for our current customer base given many of them control both collection and disposal as part of large waste collection providers in the industry. Officers will seek to ensure that existing customers and bin stock are supported to find suitable alternative provider for the continuation of waste collections. This report therefore proposes that the Council's small commercial waste collection service ceases as

soon as practicable to avoid the need for significant financial investment in what is not considered a priority statutory service.

Amendments to delivery charges for waste and recycling receptacles –

Although the Council introduced delivery charges as recently as July this year it is acknowledged that the recommendations within this report may require residents to change how and when they dispose of their recycling. To help residents who may need more recycling receptacles to enable them to present more recycling at the kerbside rather than taking it to the household recycling centre or recycling bring banks, this report recommends a reduction in the delivery charges enabling residents to have up to 3 items for £4.99 and up to 6 items for £9.98 rather than £4.99 per item with effect from 1 January 2025.

Recommendations: That Cabinet:

- 1. agrees that from Friday 10 January 2025 the Swindon Road recycling centre will undergo a prolonged closure in order for a full options appraisal to be undertaken on the future of the Swindon Road Depot and the Household Recycling Centre. The options appraisal will include an assessment of the site and the potential for finding a cost-effective solution to meet with new and future environmental legislation and regulations, engagement with GCC, engagement and consultation and appropriate involvement of the Overview and Scrutiny Committee.**
 - 2. agrees that the Council will cease to provide a direct commercial waste service to businesses in Cheltenham from a date to be determined by the Chief Executive.**
 - 3. delegates authority to the Chief Executive to implement recommendation 1 and 2, including the necessary contract variation with Ubico and to make suitable alternative arrangements for existing customers of the Council's commercial waste service.**
 - 4. agrees that the delivery charges for receptacles agreed by Cabinet on 23 July 2024 (recommendation 1) are amended as follows with effect from 1 January 2025 to assist residents using the kerbside service for any items which can no longer be taken to the Household Recycling Centre: £4.99 for up to 3 items (with a reduced delivery charge of £2.99 for up to 3 items for residents in receipt of benefits as listed in reported dated 23 July 2024) and £9.98 for up to 6 items (with a reduced delivery charge of £5.98 for up to 6 items for residents in receipt of benefits as listed in the report dated 23 July 2024).**
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1. Implications

1.1 Financial, Property and Asset implications

The Council's 2024-25 General Fund budget, approved in February 2024, includes a significant savings target of £2.741 million, with a specific focus on environmental services, aiming to save £500,000 within the financial year. To date, the Council has successfully realised £271,000 in savings toward this goal.

Several service changes are under consideration in this report, and once approved, they will be incorporated into the draft budget for public consultation in December 2024. One such change is the potential closure of the household recycling centre, which is estimated to generate annual net savings of £225,100. Additionally, the proposed changes to delivery charges for receptacles, will result in a yearly income reduction of £12,000. It is important to note that these figures represent net savings or losses, taking into account both expenditure savings and lost income.

The HRC site is approximately 0.25 hectare (0.6 acre) within the wider depot site and any closure of the site would allow for more flexible working arrangements to improve operational performance and overcome existing wider capacity issues. In isolation, this area could not easily be used by a third party, due to the proximity and conflict with recycling operations. Leasing or a sale of this site in isolation would, therefore, be impractical. It is understood that the site currently operates under exemption and that there is no permit which requires surrendering. Consequently, there should be no requirement for immediate remediation works to the site area, which could have a substantial capital cost.

Signed off by:

Jon Whitlock, Chief Accountant, jon.whitlock@cheltenham.gov.uk

Gemma Bell, Director of Finance and Assets, gemma.bell@cheltenham.gov.uk

1.2 Legal implications

Section 51(1)(b) of the Environmental Protection Act 1990 contains the duty for Waste Disposal Authorities (Gloucestershire County Council) to arrange for places to be provided at which persons resident in their area may deposit their household waste and for the disposal of the deposited waste.

Section 45 (1)(b) of the Environmental Protection Act 1990 places a duty on the Council as a Waste Collection Authority to arrange for the collection of waste from any commercial premises in its area if requested to do so. Section 45(4) permits the council to charge for the collection and disposal of the waste unless considered

inappropriate to do so. Until there is a change of law, statutory guidance or case law, it is open to interpretation as to what is required to satisfy this duty.

The Council may terminate the commercial waste services by giving each customer no less than 30 days' notice. When disposing of the commercial waste bins, the council will need to comply with its financial rules on the disposal of assets.

Ubico Limited provides the services at the HRC for the Council and the contract will need to be varied. Clause 22 sets out the variation procedure that will need to be followed and One Legal can assist with the preparation of a deed of variation to alter the contract. If the HRC comprises part of Ubico's lease at the Depot, Ubico and the Council will need to agree on the future of the area and advice from the Council's property services team and One Legal should be sought.

There is no statutory requirement in relation to consultation. However, when exercising functions of a public law nature decisions are susceptible to challenge by way of judicial review. Challenges can be brought on the basis that decisions are illegal, improper, irrational and/or in breach of a legitimate expectation. To avoid any challenge consideration must be given to whether due process has been adopted including whether adequate and appropriate consultation has been undertaken prior to a decision being taken.

Signed off by: One Legal legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

The key consideration within this report is the Council implementing a prolonged closure of the Household Recycling Centre while an options appraisal is completed, this is the circumstance which has been evaluated within the CIAT, attached as an appendix. If this site is closed for an extended period, this will result in less fossil fuel intensive activity from vehicles and energy use. There will need to be behavioural change and awareness raising surrounding waste reduction within the borough. There will be further liaison with the Climate Team surrounding the reasonable alternative arrangements for the current commercial waste service to businesses, to ensure it aligns with the corporate key priority, "working with residents, communities, and businesses to help make Cheltenham net zero by 2030" .

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

An Equality Impact Assessment has been carried out in relation to the prolonged closure of the household recycling centre and is attached to this report. A further assessment will need to be carried out as part of the options appraisal referenced above. An Equality Impact Assessment was carried out for the charging of receptacles with the cabinet report dated 23 July 2024. It was not considered necessary to complete an assessment for the commercial waste service ceasing as this will pass to another provider.

1.6 Performance management – monitoring and review

Monthly monitoring of waste and recycling tonnages, receptacles requested and delivered, fly tipping reports and neighbourhood team feedback from actions required in the borough will be carried out and reported to members as appropriate.

2 Background

The responsibility for waste and recycling in Gloucestershire is divided between District Councils and the County Council. By law, Cheltenham Borough Council (CBC) is the Waste Collection Authority, responsible for collection from residents' homes whereas Gloucestershire County Council (GCC) is responsible for disposing of the waste that is collected. This includes operating Household Recycling Centres (HRCs).

2.1 In recent years the amount of legislative and regulatory change relating to waste and recycling has been significant. The increased focus on the climate emergency and the need to protect the environment has included waste disposal and waste collection and with this the need to reduce the amount of waste that is generated in society. The Department for Food and Rural Affairs (DEFRA), the Environment Agency (EA) and the Health and Safety Executive have all either introduced new guidance, regulation or legislation which the Council must comply with and find a way of funding.

2.2 Statutory services such as kerbside waste and recycling collections are services Cheltenham Borough Council as Waste Collection Authority (WCA) have to deliver, however, services such as the household recycling centre is a discretionary service which the Council is not required to provide or fund. The obligation in respect of commercial waste is to make arrangements for collection if requested to do so by a commercial operator. Gloucestershire County Council as the Waste Disposal Authority (WDA) does have statutory responsibility for household recycling centre provision and funding.

2.3 As with all other services, waste and recycling has seen cost increases due to

inflation with rising fuel prices, tyres, vehicle parts, waste disposal costs and staffing costs. It should also be noted that housing growth, in other words an increase in the number of properties in Cheltenham, increases the number of waste and recycling collections provided, increasing funding requirements.

2.4 Over the last few years, significant housing growth has taken place in Cheltenham and Gloucestershire. More homes require more vehicles to collect higher levels of waste and recycling. Collecting from more households has placed further pressure on the existing Swindon Road Depot and CBC, in partnership with Tewkesbury Borough Council (TBC) is exploring alternative options for depot facilities, including full relocation, that will provide both councils with enough capacity to meet the waste collection demands of more and more households.

2.5 For very many years, the Borough Council has funded the provision of this discretionary service in Swindon Road with an annual running cost of approximately £614,199. The nearest GCC funded Household Recycling Centre to Cheltenham is Wingmoor Farm, Bishops Cleeve which is less than 3 miles away.

3 Reasons for recommendations

Swindon Road Household Recycling Centre

3.1 The household recycling centre in Swindon Road is the service which will be most impacted by the cost of meeting the new regulatory and legislative changes. The EA have announced changes to the permitting of waste sites such as the HRC which will require a new, more stringent permit to be obtained to continue operating the site. Specialist advice and quotations have been sought and it is estimated that approximately £1million will need to be spent on the HRC in order for an application for a new permit to be successful. Without a new permit, the EA will not allow the site to continue to operate. To achieve compliance with the EA's new regulations the council has been advised that significant infrastructure works are required. This includes undertaking significant groundworks to provide a new concrete pad for the site. If the council were to proceed with the necessary upgrades it would be expected that the site would have to be closed for an extended period to allow for the construction to be completed.

3.2 Since COVID-19, visitor numbers at the HRC have dropped considerably as residents have chosen to make use of their own kerbside recycling service and local recycling bring banks or book a slot at the GCC household recycling centre at Wingmoor Farm, Bishops Cleeve which accepts a much wider range of materials than Swindon Road does.

3.3 Due to the size of the Swindon Road HRC, and recent changes to regulations, a smaller range of materials for disposal are offered at the site than the larger GCC

operated site at Wingmoor Farm in Bishops Cleeve, therefore, some residents are choosing to book a slot to dispose of all of their waste material there rather than at Swindon Road.

3.4 Cheltenham is proud to offer such a comprehensive kerbside collection service to residents which provides an alternative and convenient means of recycling or for those who don't have space at home, our recycling bring bank sites offer another convenient alternative to driving to Swindon Road or Wingmoor Farm. A kerbside garden waste service is also available for residents in Cheltenham at £55 per year which is £2.92 per collection (plus a one off £4.99 delivery charge for new customers) saving residents the cost of fuel and reducing CO2 emissions by reducing unnecessary car journeys to Swindon Road or Wingmoor Farm to dispose of garden waste.

3.5 Since 2019, the number of site users has dropped from approximately 1000-2000 cars per day to approximately 400-450 cars per day, indicating that more residents are choosing alternative ways of disposing of waste as highlighted above. Now, more than at other times in the past, lower numbers of site users suggest the site appears to offer a less convenient service to residents who are choosing to use kerbside services, the bring banks or Wingmoor Farm HRC in Bishops Cleeve.

3.6 Cheltenham has an excellent kerbside recycling service dating back to 2011 helping residents to recycle a comprehensive range of items along with recycling bring banks in various locations around the borough enabling many residents to dispose of recycling items easily without the need to travel to a HRC.

3.7 In 2017, the kerbside recycling service was further improved allowing residents to recycle plastic bottles, pots, tubs and trays; aluminium and steel cans; glass; cardboard; paper; small electrical items; batteries and textiles. In 2021, Cheltenham was the first authority to sign up to the kerbside coffee pod collection service called Podback (at no cost to the taxpayer) which has successfully collected well over 4.5 million coffee pods thanks to the support of residents.

3.8 The Environment Act 2021 (Simpler Recycling) requires local authorities to introduce the kerbside collection of flexible plastics and cartons by 2027. Cheltenham is already trialling flexibles collections in parts of the town centre, Wymans Brook and Benhall and therefore has an understanding of the additional costs that will be involved in delivering this service to all households. Whilst the government have promised clarity of any funding provision before Christmas 2024, at the time of writing this report there is no clarity on what funding will be available and whether this will meet some or all of our costs in collecting and recycling this material. Different vehicles will be required and significant changes to the bulking shed will be needed to sort the material appropriately to sell on for recycling, assuming there are end markets willing to pay for the material rather

than it be a financial cost.

3.9 In this context, CBC is recommending a prolonged closure of the Swindon Road HRC while it undertakes a full options appraisal of both the future of the HRC and the wider depot site at Swindon Road.

This options appraisal will include but is not limited to:

- Exploring the long-term future and location of the Swindon Road Depot to meet CBC residents long term needs
- Approaching GCC as the responsible council for the provision of HRCs to explore how Cheltenham residents' needs with regard to an HRC service can be met.
- Finalise costs, options, and any further surveys on site to explore whether a cost effective HRC offer can be provided on the site.
- Undertaking consultation and engagement, including engaging with CBC's Overview and Scrutiny on the future of waste and recycling need.

To undertake this options appraisal this report sets out that the prolonged closure of the HRC will start from Friday 10 January 2025. CBC cannot set any re-opening date for the site or bring forward any further proposals for the future of the service until this work has been undertaken.

3.10 It is expected that implementing a prolonged closure of the HRC will generate savings for the council for the period it is closed. It is estimated that if the site remained closed for 12 months this would result in a revenue saving of at least £225,100. For the duration that the site is closed the council is committed to ensuring any savings are used to help support, improve and maintain other core council services, including waste, recycling and street cleansing.

3.11 As GCC have the statutory responsibility for the provision of HRCs, the council will engage with GCC to explore any potential measures that could help serve Cheltenham residents while the Swindon Road HRC is closed. While any decisions on the level of service provided at GCC operated sites is reserved for the County Council, CBC will request that GCC consider how any closure of the Swindon Road site may create additional demand – particularly at the Wingmoor Farm site. In addition, CBC will approach GCC to jointly consider the long-term provision of kerbside collection and HRCs which will need to accommodate and serve a projected 17,000 additional homes planned in Northwest Cheltenham and Tewkesbury Borough.

Commercial Waste Service

3.12 The Council operates a small commercial waste service which is well-regarded by its customers. However, the legislative changes required by the

Environment Act 2021 are likely to necessitate significant investment in this service, both in terms of officer time and financially, with no likelihood of recovering our expenditure due to price sensitivity and the competitive nature of the market.

3.13 There are many providers of commercial waste and recycling services in the area who are likely to be much better placed to meet the new requirements of the Environment Act 2021 for our current customer base given many of them control both collection and disposal as part of large waste collection providers in the industry.

3.14 Officers will seek to ensure that existing customers are supported to find suitable alternative arrangements and a provider for the continuation of their commercial waste collections.

3.15 Amendments to delivery charges for waste and recycling receptacles

3.16 Whilst the Council introduced delivery charges in July this year it is acknowledged that the recommendations within this report may require residents to change how and when they dispose of their recycling. The Council actively encourages residents to recycle and reduce their residual waste and it is hoped that changes to the charging regime will support this.

To help residents who may need more recycling receptacles to enable them to present more recycling at the kerbside rather than taking it to the household recycling centre or recycling bring banks, this report recommends (recommendation 1) a reduction in the delivery charges enabling residents to have up to 3 items for £4.99 (reduced to £2.99 for those residents in receipt of the specified benefits) and up to 6 items for £9.98 (reduced to £5.98 for those residents in receipt of the specified benefits) rather than £4.99 per item with effect from 1 January 2025.

4 Alternative options considered

4.1 Household Recycling Centre

4.2 The only alternative option to undertaking the proposed options appraisal and engagement with GCC would be for the Council to take a budgetary decision to invest circa £1m in the site and apply for a new permit to ensure that the Swindon Road HRC could operate in the medium and long term.

4.3 However, with the potential need to identify and develop an alternative depot site in the medium term to replace Swindon Road, investing £1m in a depot that may need to re-locate in the coming years to safeguard the long-term provision of waste and recycling collections does not represent value for money for taxpayers or is an effective use of the capital resources of the Council at this time.

4.4 It is therefore, recommended that the preferred option is that the council implements a prolonged closure of the services so that it can undertake the options appraisal as described in section 3 to take a more informed decision on the future of the site. Critical to this will be understanding and taking a decision on the long term future of the Swindon Road Depot and working with GCC on their provision of a county-wide HRC service.

4.5 Commercial Waste Service

4.6 The Council has reviewed its market share in the past and due to budget pressures, insufficient resource is available to seek to grow the business further and whilst this may be possible with additional resource, the competition locally for such services is so strong the Council's market share is unlikely to grow significantly. Further investment into this service is not considered best use of taxpayers money particularly given the significant investment likely to be needed to meet the requirements of the Environment Act 2021.

4.7 Amendments to delivery charges for waste and recycling receptacles

4.8 Whilst residents are still ordering new recycling receptacles following the introduction of a small delivery charge in July this year, and therefore not amending the delivery charges may be considered appropriate, ensuring residents are supported in their efforts to increase recycling is important to the Council and amending the delivery charges is recommended.

5 Consultation and feedback

5.1 The budget report and budget consultation that is published in December 2024 and closes in January 2025 will include the prolonged closure of the HRC given the need to set the 2025/26 budget. Further public consultation and/or a residents' survey will take place in 2025.

5.2 As part of this report members have given due consideration to the climate change assessment tool and the equalities impact assessment attached to this report.

6 Key risks

6.1 Risks are set out in the risk assessment at appendix 1.

Report author:

Karen Watson, Environmental Partnerships Manager,
karen.watson@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening
- iii. [Climate Change Impact Assessment](#)

Background information: N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If assumptions within the report regarding the diversion of waste and recycling from the HRC to kerbside or other services are wrong the financial savings and recycling rate may be negatively impacted.	Gareth Edmundson	3	3	9	Reduce	Monthly monitoring; introduction of an app and other promotion to encourage residents to recycle at kerbside	Karen Watson	Monthly/ quarterly/ annually
	If residents fail to dispose of their waste and recycling responsibly fly tipping may increase	Gareth Edmundson	2	2	4	Reduce	Monthly monitoring; introduction of an app and other promotion to raise awareness	Karen Watson	Monthly/ quarterly/ annually
	If communications are not proactive and appropriate there may be a negative public reaction to the service change	Gareth Edmundson	3	2	6	Reduce	Communications plan has been produced in consultation with cabinet members	Karen Watson/Katie Sandey	Weekly review initially
	If another commercial waste provider is unwilling to take on the existing customer base,	Gareth Edmundson	2	1	2	Accept	Actively seek to identify alternative providers via a	Karen Watson	December 2024 and March 2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	customers will need to make their own alternative arrangements and bin stock may need to be retrieved						tender exercise		
	Any decision made by the council that impacts a public service is at risk of complaint and/or legal challenge.	Gareth Edmundson	2	1	2	Reduce	Follow statutory processes and best practice	Karen Watson	ongoing
	If clarifications are issued regarding Section 45(1)(b) of the Environmental Protection Act 1990, the Council may be required to re-commence the commercial waste service	Gareth Edmundson	2	1	2	Accept	Follow guidance issued	Karen Watson	ongoing

Raw risk score

The initial risk score is the impact score multiplied by the likelihood score. This is called the raw risk score, without any controls in place to mitigate the risk.

Appendix 2: Equality Impact Assessment

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment

Officer responsible: Karen Watson	Service Area: Environmental Services
Title: Environmental Partnerships Manager	Date of assessment: 17 October 2024
Signature: <i>K Watson</i>	

b. Is this a policy, function, strategy, service change or project?

Service

If other, please specify:

c. Name of the policy, function, strategy, service change or project

A prolonged closure of the household recycling centre in Swindon Road.

Is this new or existing?

Is changing

Please specify reason for change or development of policy, function, strategy, service change or project

A prolonged closure of the Swindon Road Household Recycling Centre to enable a full options appraisal to be undertaken on the future of the Swindon Road Depot and the Household Recycling Centre, including an assessment of the site and the potential for finding a cost-effective solution to meet with new and future environmental legislation and regulations, engagement with GCC, engagement and consultation and appropriate involvement of the Overview and Scrutiny Committee.

This impact assessment has been completed in the context of a prolonged closure of the HRC.

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:

To ensure the Councils remains compliant with EA permitting regulation change and can continue to fund statutory services whilst completing an holistic review of the future of the Swindon Road Depot site including the HRC

Objectives:	To enable the council to undertake a full options appraisal of the site
Outcomes:	A detailed and informed options appraisal is available which enables the council to make decisions on the long term future of the site.
Benefits:	The prolonged closure will provide the council time to complete a detailed options appraisal and make informed decisions.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

Yes

Do you expect the impacts to be positive or negative?

Unsure

Please provide an explanation for your answer:

During the prolonged closure of the site residents are able to access a comprehensive kerbside waste and recycling service along with recycling bring banks across the borough. Using these services will reduce their need to travel to the household recycling centre which is unable to accept as many waste types as the Gloucestershire County Council operated site at Wingmoor Farm, Bishops Cleeve less than 3 miles away and approximately 10 minutes drive. Residents able to drive to Swindon Road will be able to drive to Wingmoor Farm.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate

Stage Two required	Yes
Owner of Stage Two assessment	Karen Watson
Completion date for Stage Two assessment	23 October 2024

[Stage 2](#)