

Call In request relating to Waste Disposal Contract - Household Waste Recycling Centre Efficiency Savings – Decision published 16 August 2024

The below information was considered by the Executive Director for Place, when considering his decision regarding the amendment of HWRC opening hours and the closure of Nab Lane

Consultation:

There is no statutory requirement for a consultation on these services, statutory guidance or minimum level of service provision.

Previous consultation on the Waste Strategy did gain a level of feedback from residents which confirmed Nab Lane as the least used site within Kirklees, which was evidenced further by the tonnage information.

The consultation on the proposal was integrated as part of the budget consultation, this was held on our Involve website and was widely communicated at the time. This is undertaken every year and puts forward proposed changes to budgets and resulting service impacts.

Residents were able to take part ahead of the final budget being agreed in the Cabinet report in March. Information can be seen here:

[Budget and accounts | Kirklees Council](#)

And specific templates are available here:

[2024/25 Budget Saving Proposals - Growth and Regeneration \(kirklees.gov.uk\)](#)

These reference both a review of opening hours and efficiencies from the HWRC service. The opening hours of a facility can range from zero to the limits of the Environmental Permit, depending on operational requirements.

Decision Making Process:

The Councils budget setting process identified a target saving from the district's HWRC sites (Budget report 6th March 2024, Item 24EC9).

[Microsoft Word - Cover Letter - Despatch Budget Motion 2024.doc \(kirklees.gov.uk\)](#)

To meet the saving, a data led review was undertaken with SUEZ, and ultimately the primary option identified was to reduce opening hours on 2 HWRC and close Nab Lane. This review was also identified in the Cabinet report on Waste that was presented on 9th April:

[Agenda for Cabinet on Tuesday 9th April 2024, 1.30 pm | Kirklees Council](#)

The following were resolved at this meeting:

4) That authority be delegated to the Strategic Director Growth and Regeneration, Service Director Legal Governance and Commissioning and Service Director for Finance to:

(iii) Take a decision following a further review to identify if efficiency opportunities could be made by mothballing the Kirklees Materials Recovery Facility and using a third-party facility and/or changes to household waste recycling centre services.

SUEZ presented several options including:

- Closure of Nab Lane only – Unable to raise the efficiency savings necessary.
- Closure of Nab Lane and reducing hours across the remaining sites – This approach was not supported by the demand data and would be more expensive to operate (multiple closure one day per week).
- Closure of Nab Lane and reduced hours at Bromley Farm and Meltham (decision) – Data driven (tonnages/recycling) and meets the efficiency target.

The changes to the HWRC sites resulting from the decision are set out in the table below:

Site	Mon	Tues	Wed	Thu	Fri	Sat	Sun
Nab Lane	Closed	Closed	Closed	Closed	Closed	Closed	Closed
Bromley Farm			Closed	Closed			
Meltham	Closed	Closed					
Emerald Street							
Weaving Lane							

The DDN notice is published here:

[Decision - Waste Disposal Contract - Household Waste Recycling Centre Efficiency Savings | Kirklees Council](#)

The closure of a site was also specifically discussed at a scrutiny meeting ahead of the April Cabinet, and can be viewed here:

[Agenda for Environment and Climate Change Scrutiny Panel on Wednesday 27th March 2024, 2.00 pm | Kirklees Council](#)

At the time Scrutiny did not choose to expand further on the discussion.

Integrated Impact Assessments:

This is the original IIA Sept 23 when the Budget proposal went forward and carried into the March / April Cabinet reports:

[Integrated Impact Assessments - IntegratedImpactAssessment \(kirklees.gov.uk\)](https://www.kirklees.gov.uk/Integrated_Impact_Assessments_-_IntegratedImpactAssessment)

This is the refresh done at the point of DDN decision:

[Integrated Impact Assessments - IntegratedImpactAssessment \(kirklees.gov.uk\)](https://www.kirklees.gov.uk/Integrated_Impact_Assessments_-_IntegratedImpactAssessment)

WRAP(Waste & Resources Action Plan) Guidance

There is no statutory guidance or minimum level of provision for HWRCs. WRAP Guidance states in practice individual local authorities should reach their own conclusions in terms of minimum acceptable levels of HWRC provision.

The same Guidance suggests the following points as a reasonable minimum:

- Maximum catchment radii for a large proportion of the population: 3 to 5 miles (very rural areas: 7 miles).
- Maximum driving times for the great majority of residents in good traffic conditions: 20 minutes (very rural areas: 30 minutes).
- Maximum number of inhabitants per HWRC (in all but the most urbanised areas): 120,000.
- Maximum number of households per HWRC (in all but the most urbanised areas): 50,000.

Wards and Population Affected by Nab Lane Closure:

Ward	Population (2021 Census)
Liversedge & Gomersal	19,418
Cleckheaton	17,187
Birstall & Birkenshaw	16,917
Total	53,522
Total Kirklees	433,216
% of Kirklees	12%

Travel Distance for Affected Wards:

Area	Nab Lane, Birstall		Weaving Lane, Dewsbury		Variance	
	Distance (Miles)	Travel Time (Min)	Distance (Miles)	Travel Time (Min)	Distance (Miles)	Travel Time (Min)
Liversedge	3.4	11	3.7	14	0.3	3
Cleckheaton	3.4	11	4.8	19	1.4	8
Gomersal	2.3	7	4.4	15	2.1	8
Birkenshaw	3.6	10	6.4	20	2.8	10

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East Bierley	3.8	10	6.9	21	3.1	11
Birstall	1.4	5	4.9	18	3.5	13
Average	3.0	9	5.2	18	2.2	9

Population of Wards proposed to use Weaving Lane HWRC, Dewsbury:

Ward	Population (2021 Census)
Birstall & Birkenshaw	16,917
Cleckheaton	17,187
Heckmondwike	18,153
Batley East	18,904
Dewsbury South	19,261
Liversedge & Gomersal	19,418
Mirfield	19,771
Dewsbury East	20,086
Batley West	20,109
Dewsbury West	21,688
Total	191,494

Average Distance and Travel Time for Weaving Lane HWRC, Dewsbury post closure:

Area	Weaving Lane, Dewsbury		Population (2021 Census)
	Distance (Miles)	Travel Time (Min)	
Birstall & Birkenshaw	6.1	20	16,917
Cleckheaton	4.8	19	17,187
Heckmondwike	2.8	9	18,153
Batley East	2.9	12	18,904
Dewsbury South	1.0	5	19,261
Liversedge & Gomersal	4.1	15	19,418
Mirfield	3.0	12	19,771
Dewsbury East	1.0	5	20,086
Batley West	2.9	12	20,109
Dewsbury West	1.0	5	21,688
Average	3.0	11	

Comparison of proposed change vs. WRAP Guidance:

Area	WRAP Guidance
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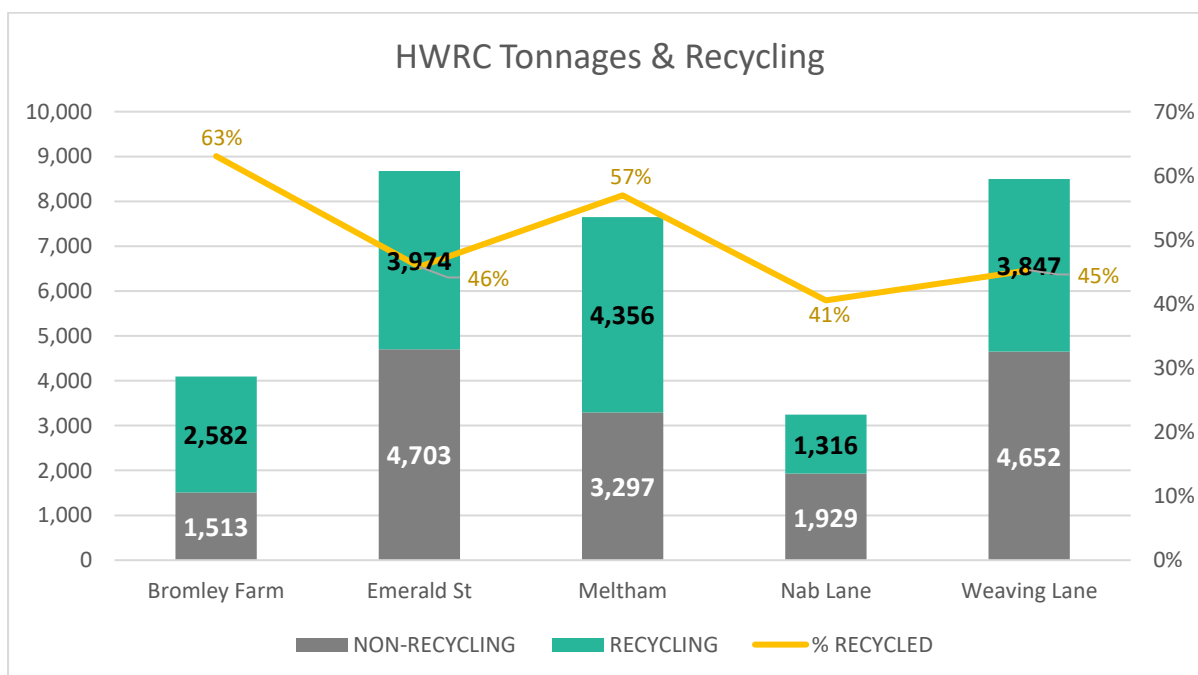
	Distance (< 5 Miles)	Travel Time (< 20 Min)
Birstall & Birkenshaw	X	✓
Cleckheaton	✓	✓
Heckmondwike	✓	✓
Batley East	✓	✓
Dewsbury South	✓	✓
Liversedge & Gomersal	✓	✓
Mirfield	✓	✓
Dewsbury East	✓	✓
Batley West	✓	✓
Dewsbury West	✓	✓
Average	✓	✓

This shows all wards are compliant under the suggested guidance, except for Birstall & Birkenshaw, which is 1.1 miles further than the 5-mile target. It is worth noting that the guidance uses the terms 'large proportion' and 'great majority', recognising that there will be some variation, and the guidance is not an absolute position. The overall average position is compliant.

The total population comparison is 191,494 against a suggested maximum of 120,000. However, the guidance also states this is in all but the most urbanised areas, which would include some of the areas served in this instance.

Tonnages and Performance:

The table below shows the latest information for all HWRCs within Kirklees:



The Nab Lane HWRC receives tonnages of 3,245 per annum and has a recycling performance of 41%. This is the lowest for both measures in the district. Bromley Farm has the next lowest usage and receives 4,095 tonnes per annum but has the highest recycling rate of all HWRCs at 63%.

The total tonnages per annum that would be received at the Weaving Lane HWRC post closure would be 11,744, which is significantly under the WRAP suggested maximum of 17,250.

Regulator Positions:

HWRCs are regulated by the Environment Agency under the environmental permitting regulations, and the Health and Safety Executive. The change is principally around a review of the waste procurement strategy, initially the household waste recycling centres (HWRCs) were going to be brought back in-house for the Council to operate at their risk. Due to the Council's budget position, it was found to be more efficient to keep the HWRC's within the integrated and modernised waste disposal contract, and a transfer of the permit has the potential to trigger a review of the permit conditions.

Nab Lane is not a split-level site and the Waste Industry Safety & Health (WISH) forum published V2 of a formal guidance document in April 2024 [Health & Safety at HWRCs](#), that states split-level sites should be utilised to segregate pedestrians and traffic, avoid significant slip & trip hazards and minimise the risk of falls from height.

The standards are also set out in the WRAP Guidance for HWRCs [WRAP guidance 2018](#). Government and Council Recycling Targets for HWRC's are set to increase under the new contract, and the WRAP guidance evidences that Split-level sites can improve their efficiency, help increase recycling, enhance the experience of the public, and make it easier for both users and staff to focus on recycling.

HWRC Capital Development Costs:

The Nab Lane HWRC is the only one within Kirklees that requires users to walk up gantry steps to disposal of items, as can be seen in the photograph below, which as mentioned above, does not comply with the WRAP Guidance and creates H&S concerns.

Any new facility would be required to have split levels, which means users can park their vehicles on the same level as the top of the containers, allowing passage over an even surface and minimising any risk of injury.

In discussions with SUEZ, and with a view to the upcoming procurement, an estimated price of £7m (rounded up from the £6.3m average for inflation) was



provided to redevelop the site into a modern, fit for purpose facility. This was benchmarked as part of the wider waste strategy work and WSP, our technical advisors, provided the following cost estimate:

DESCRIPTION	OPTION 1
DEMOLITION AND SITE CLEARANCE	£82,409
EARTHWORKS	£595,954
DRAINAGE	£91,610
RC WALLS TO RAMPS AND UNLOADING AREA	£329,366
RC WALLS Lower Unloading Area	£36,610
HARDSTANDING	£575,189
SAFETY FENCING & BARRIERS	£277,107
BUILDINGS & UTILITIES	£218,800
MISCELLANEOUS WORKS	£103,924
CANOPY	£609,000
ALLOWANCE FOR UNMEASURED ITEMS	£218,998
PRELIMINARIES / GENERAL ITEMS	£1,098,638
CONTINGENCY	£423,760
CONSTRUCTION COST SUB-TOTAL	£4,661,363
CONSTRUCTION COSTS (EXCLUDING VAT) Rounded upto nearest £100K (GBP)	£4,700,000
PROJECT ON-COSTS (Allowance)	£1,410,000
CONTINGENCY	£141,000
Project On-Cost Sub-Total	£1,551,000
CAPEX TOTAL (EXCLUDING VAT) Rounded upto nearest £100K (GBP)	£6,300,000
EST. ACCURACY LOWER LIMIT (GBP) AACE Class 4	£5,355,000
EST. ACCURACY UPPER LIMIT (GBP) AACE Class 4	£8,820,000

This provided a cost envelope of £5.3m to £8.8m as of November 2023, and an actual estimate of £6.3m, which was comparable.

Future Development of Weaving Lane HWRC:

As part of the ongoing investment with Kirklees by the TransPennine Rail Upgrade, the Council will benefit from a brand-new facility being development adjacent to the current Weaving Lane site. This facility design has been developed in partnership with the TRU, the Council and SUEZ, to provide a modern, fit for purpose facility that will be more than capable of servicing the increased demands on it. A general layout drawing is included below. This investment is coming at no cost to the Council:

