



### **Household Waste Collection Consultation 2024**

Dear Sir/Madam,

In addition to our response to the Consultation Questionnaire this e mail provides more detail with respect to Bollington Town Councils feedback on the above Consultation.

Of the options put forward we consider Option 2 and Option 4 (moving to 3 weekly black bin collections) unacceptable.

Options 1 and 3 are acceptable so long as all residents get a weekly food waste collection.

The reasons for our response are: -

#### **Health and Safety**

DEFRA Waste collection services: guidance for local authorities (pub 23/7/21) includes the following: -

#### ***1.1 You must maintain collections of residual (black bag) waste to: -***

***Prevent waste from building up.***

***Protect public health and the local area***

#### ***3. Residual (black bag) refuse collection. Priority: High***

***Putrescible waste could build up and become a risk to human health. If waste is bagged (rather than in containers) you need to maintain regular collections.***

***This service must be maintained by local authorities by law. (Environmental Protection Act 1990)***

#### ***13. Clinical or Absorbent Hygiene Products (AHP). Priority: High***

***Maintain service to prevent infections and protect public and environmental health.***

The Feasibility Study contains no reference to public and environmental health. What assessment has been made of Health Risks?

Bollington contains approximately 400 properties (generally terraced cottages) where black bins cannot be used due to space and access restrictions. These residents have to use black bin bags. The loss of a nearby HWRC makes it likely that more waste will accumulate in these black bags creating a health hazard.

Approximately 140/150 folk in Bollington, mainly aged, require a care package. These and others, many of whom live in properties that cannot use black bins, will use Absorbent Hygiene Products (incontinence pads), the accumulation of which will add to the health risks and unacceptable odours.

Added to this is the confusion arising from three weekly collection intervals, with the prospect of a six-week interval between collections if one is inadvertently missed.

Additionally, there are many young families in Bollington who will also be using Absorbent Hygiene Products (nappies) on a regular basis.

In addition, the loss of the HWRC in Bollington will lead to more waste going into Black bins.

### Cost Considerations

A number of conclusions in the Feasibility study arise from modelling assumptions.

The following statements are made....

Evidence shows that when moving to 3 weekly collection there is a 20.5% reduction in kerbside waste (this refers to residual 'black bin' waste).

The data supporting this contention is very odd, particularly when put alongside the statement that 'there is no clear evidence of an increase in HWRC usage and fly-tipping.'

So where did all the reduction in kerbside waste go? There is no explanation. Whereas it is obvious that black bin waste will reduce when weekly food collections start (at least for those without green bins), it is entirely unclear why black bin waste should reduce when moving to 3 weekly collection from 2 weekly (unless black bins are getting full and therefore excess waste is put inappropriately in garden waste or recycling bins or taken to HMRC's or fly-tipped, ) The statement that 'there is no clear evidence of an increase in HWRC usage and fly-tipping' begs more questions than it answers. There is no data to support this contention in the report and it should be remembered that 'absence of evidence' (i.e. no data) is not 'evidence of absence'.

There is a statement in the Conclusion of the Feasibility Report that sheds some light on this.....'However, there is uncertainty on the size of the waste prevention effect and whether waste streams at HWRC's or fly-tipping could increase, so disposal savings should be treated with caution.' It seems that the authors of the report are hesitant to put any trust in the data they have used to generate comparative costings of the options.

Focussing on the comparison of Option 1 (fortnightly collection of black bins) and Options 2 (3 weekly collection of black bins): -

The major reason that Option 2 is shown as less expensive than Option 1 is that the assumed savings (as shown in figure 6 of 4.3.1 in the Feasibility Study) from a reduction in Sorting, Disposal and Treatment Costs are £0.67M for Option 1 and £1.76M for Option 2.

### **This is a difference of £1.09M!**

The authors of the Feasibility Report go some way to recognising the risk of this assumption, saying...

'In the worst-case scenario there is no waste prevention effect and the entire difference (6,872 tonnes) ends up being taken to HWRC's as residual waste.....annual savings of £800K could be lost'. Given that the closure of HWRC's is already going to drive up volumes at Macclesfield HWRC where safety concerns on the A536 have already been voiced, this additional tonnage would be unwelcome to say the least.

Interestingly Table 3 in the Executive Summary shows another comparison between these Options. Capital, Transition and Ongoing Revenue costs for Option 1 total £5.1M and for Option 2 £5.8M. In this comparison Option 2 is £0.7M more expensive!

In summary the Cost argument in favour of moving to 3 weekly black bin collections is primarily based on an illogical assumption that it will result in less residual waste than for a 2-weekly collection. Waste doesn't just disappear....it must go somewhere else! The cost argument is predicated on a highly contestable key assumption that impacts the cost analysis by over £1M.

To repeat what the authors of the report state in their conclusion....'However there is uncertainty on the size of the waste prevention effect and whether waste streams at HWRC's or fly-tipping would increase, so disposal savings should be treated with caution.'

### Conclusion

The proposal to move to 3 weekly black bin collections is unsound on health, environmental and cost grounds. It is also discriminatory against the disadvantaged and frail in our communities and runs counter to the direction indicated by central government in the 'Simpler Recycling Collections' proposals published 9/5/24 where it is stated that....'Councils will be expected to collect black bins at least fortnightly, alongside weekly food waste collections.'

Cheshire East should drop the 3 weekly black bin collection proposals immediately.



Nicola Antoney

Town Clerk

On behalf of Bollington Town Council and the residents of Bollington.