

# APPENDIX A - BRIEFING REPORT

## REINSTATEMENT OF CHARGES FOR NON-HOUSEHOLD WASTE AT RECYCLING CENTRES



### I. EXECUTIVE SUMMARY

In January 2021 charges for disposing of plasterboard, soil and rubble and asbestos were introduced at Chelson Meadow HWRC.

The scheme operated successfully for 5 months and during that period a total of £56,000 was recovered in charges to offset disposal costs. The scheme did not operate for a long enough period to be able to gain meaningful data on the impact on waste volumes.

Charges were subsequently withdrawn in June 2021 following a change in political administration.

The infrastructure remains in place to allow charging to be reintroduced at short notice. To remobilise the scheme would require refresher training for staff, some minor changes to signage on site, an update to the relevant pages on the website and an information campaign to let customers know the intention to re-introduce charging.

It is estimated that charging for non-household waste would result in a saving of £177k per year to the service. The actual savings would depend on how much of these waste types continue disposed of at the site and the extent of waste reduction and diversion that occurs.

### 2. BACKGROUND

#### 2.1 Obligations

The key legislation relevant for this decision is the Environmental Protection Act (1990) and the Controlled Waste Regulations (England and Wales) 2012. The Environmental Protection Act (EPA) sets out the principle that waste presented at civic amenity sites, such as the HWRC's, are able to levy charges for types of waste which aren't classed as household.

#### 2.2 Details of the Scheme

It is proposed that if the decision is taken to re-instate charging at Chelson Meadow the system that operated successfully in 2001 should be adopted.

The details of that scheme are as follows:

**Charges:** The charges are aligned to the highest offered by neighbouring Local Authorities to ensure that there is no incentive for non-Plymouth residents to attempt to visit Chelson Meadow to dispose of these items. The charges were as follows:

- Soil & rubble £2.40 per bag or item
- Plasterboard £6 per bag or sheet
- Bonded Asbestos £11 per bag or sheet

**Payment:** Payment is made on site by credit/debit card only. No cash or cheques accepted.

**Operation:** Gates and fencing have been installed on site so that the areas where the chargeable waste is stored are locked. Any customers wanting to dispose of a chargeable waste type are directed to the area where an operative will assess the extent of waste they have and calculate the charge due. Payment is taken and then the area for disposal is unlocked to allow the customer to dispose of their waste. The customer is made aware of the charges before they dispose of their waste and given the option of finding an alternative means of disposal. No

negotiations are made as to the cost of disposal. There is a dedicated portable building on site where the payments are taken and electronic equipment is stored.

### 3. IMPACT OF RE-INSTATING CHARGES AT CHELSON MEADOW HWRC

**Costs:** The estimated total cost saving per year would be £177k made up of the following:

<b>Additional staffing costs</b>	<b>(£29k)</b>
<b>Disposal cost saving</b>	<b>£54k</b>
<b>Revenue from charges</b>	<b>£146k.</b>
<b>Increased commercial revenue</b>	<b>£6k</b>

**Personnel:** the cost estimate assumes that an additional member of staff will be required at busy times.

**Level of service to residents:** the only impact to the service provided to residents is that a charge will be levied for the disposal of waste types that fall within the scheme.

**Chelson Meadow HWRC:** infrastructure improvements were made to the site prior to the introduction of charges in 2001 so no further adjustments to the site are required. The cost of these improvements is already being charged to the site operating costs.

**Waste reduction:** The introduction of charges encourages greater reuse of materials thus reducing environmental impact of disposal process. Experience where similar schemes that have been introduced in other areas show a significant reduction in quantities of the waste types attracting charges and it is expected that a similar impact would be experienced at Chelson Meadow. For the purposes of the business case an 80% reduction for soil, rubble and plasterboard was used.

### 4. RISKS

**Risk of queuing:** Risk of queuing at site resulting in tailbacks onto the Highway as a result of the extra time taken to process charges. To mitigate this a separate reception area has been created to process charges to avoid any impact of flow of traffic through the site. No excessive queueing was experienced during the previous operational period.

**Alternative disposal routes:** there is a potential that increased volumes of non-household waste will be placed into domestic wheelie bins to avoid charges. This has been recognised in the business plan and a proportional increase in disposal fees has been included within the revised disposal cost scenarios.

**Political Risk:** the introduction of charges in 2021 resulted in very little opposition from customers however the economic landscape has changed significantly with the recent high profile increases in the cost of living so the re-introduction of charges could be very negatively received by site users.

**Fly Tipping:** Possibility of an increase in fly tipping. This risk was covered in significant detail in the initial proposal and there is evidence nationally that there is no significant increase in fly tipping as a result of the introduction of charges for waste at HWRC sites.

S.75 Environmental Protection Act 1990 (the 1990 Act) sets out the definitions of controlled waste into three categories of waste (i.e. household, industrial and commercial waste). The Controlled Waste (England & Wales) Regulations 2012 (the Regulations) provides further clarification, although there remains a lack of legal clarity over whether household waste falls to include DIY waste or whether it falls to be construction waste as it is waste from improvement, repair or alteration. Nevertheless, many local authorities continue to charge, in spite of government indicating an intention to provide clearer guidance, which may lead to prohibiting charging – a view supported by DEFRA's who recognise the need to update current rules. Therefore some risk exists, however as above it is not uncommon for disposal charges to be made by Disposal Authorities across the county and, were the matter clear, legislative clarity would not be needed.