

# FOR PUBLICATION

# DERBYSHIRE COUNTY COUNCIL

# CABINET

# 27 July 2023

# **Report of the Executive Director - Place**

#### Operation and Management of Household Waste Recycling Centres (Cabinet Member for Infrastructure and Environment)

#### 1. Divisions Affected

1.1 County-wide.

#### 2. Key Decision

2.1 This is a key decision because it is likely to be significant in terms of its effect on communities living or working in an area comprising two or more electoral areas in the County.

#### 3. Purpose

- 3.1 The purpose of this report is to consider the operations and management of Household Waste Recycling Centres ("HWRC"), to set out the plan of actions to deliver an existing budget saving agreed as part of the 2021-22 Revenue Budget Report and to seek the necessary approvals to commence implementation in advance of the financial year 2023-24.
- 3.2 The report also seeks approval to commence consultation in relation to the implementation of the proposals. The proposed consultation will also seek resident input on additional savings proposals that have not been formally adopted at this time.

- 3.3 The decisions sought from Cabinet are:
  - a) Approval to spend up to £20,000 from the current Resources and Waste reserve and up to £180,000 from an existing waste capital project (subject to approval of the next quarterly capital monitoring report) to install Automatic Number Plate Recognition ("ANPR") systems, back-office integrations and customer facing web portal and the addition of this project to the 2022/23 Capital Programme.
  - b) Approval to conduct a public consultation in relation to the implementation of the existing budget saving and budget saving options put forward as part of the 2023-24 budget setting process. Namely; charging for usage of HWRCs by non-residents, limiting the materials accepted on-site, reducing the opening hours of HWRCs.

# 4. Information and Analysis

# The basis on which we currently operate our HWRCs

- 4.1 Derbyshire County Council is a Waste Disposal Authority ("WDA") with statutory duties to arrange for the disposal of Local Authority Collected Municipal Waste ("LACMW"). Under Section 51 of the Environmental Protection Act 1990, it is the duty of all WDAs to provide places for residents in its area to deposit household waste and to arrange for its disposal.
- 4.2 These HWRCs must operate free of charge to residents in the WDA's area, be situated in a reasonably accessible location and be open at all reasonable times.
- 4.3 The requirement for local authority HWRCs to accept waste does not extend to commercial waste, waste arising from construction and demolition activities or certain categories of waste including asbestos and tyres.
- 4.4 The Council provides nine HWRCs across its administrative area, eight operated under contract by the waste management company HW Martin, and one operated under contract by Suez Recycling and Recovery UK Ltd.
- 4.5 Taken together, these sites currently receive approximately 85,000 tonnes of waste and recyclates each year.

#### We have seen volumes of waste deposited at HWRCs increase sharply which is a cost to the County Council

4.6 The annual volume of waste being deposited at HWRCs has sharply increased over recent years with a 32.14% increase observed between

the 12 months ending March 2018, and the 12 months ending March 2022.

- 4.7 This increase has been in sharp contrast to the relatively modest c.1% annual growth observed in total waste volumes from other collection schemes and has coincided with the introduction by neighbouring authorities of measures to restrict access to residents only.
- 4.8 A comparison between waste volumes at Derby City Council's HWRC and the County's HWRCs shows the County's facilities receive 2.5 times the amount of waste per person than the City's facilities. The only significant difference between the two authorities with regard to HWRC acceptance policy is the application of a booking system that includes proof of residency in Derby. Derby is also geographically 'insulated' from those authorities that border Derbyshire and is therefore less prone to cross-border displacement of domestic waste.
- 4.9 This ratio increases further still for asbestos and tyres which the surrounding authorities of Staffordshire, Leicestershire, Nottinghamshire either charge for or do not accept at all. Derbyshire County Council HWRCs accept 7 times the amount of these materials per person than Derby City Council facilities.
- 4.10 There is insufficient data available to provide an exact figure, however conservative estimates place the additional cost incurred by the County Council in the region of £700-£800k per year. This is in effect, a subsidy paid by Derbyshire to private businesses and surrounding councils.

#### We are committed to making savings on our budget for HWRCs and we want to do so as effectively as possible

- 4.11 As part of the 2021-22 budget setting process, the revenue budget monitoring report included a £230,000 net revenue saving by introducing a set of measures to ensure only residents of Derbyshire were able to access the County's network of HWRCs.
- 4.12 This saving has not yet been delivered and has been carried forward into successive financial years until a delivery plan and formal decision to implement is approved.
- 4.13 The budget saving relies on the Council implementing a robust system to identify users of HWRCs who are not domiciled within the County boundary or who are operating commercially in order that they be refused entry to use the HWRCs.

- 4.14 Further cost reductions of £370k in Resources and Waste are also required to mitigate future years' savings that can no longer be delivered as originally intended.
- 4.15 In developing delivery options, the service has considered the risk of unintended consequences including any adverse impact on fly-tipping arising from the introduction of more stringent controls. Whilst there is little research on the impact of registration systems such as ANPR on fly-tipping in an area, the Waste and Resource Action Programme (WRAP) has undertaken research into possible links between the introduction of charging schemes for DIY materials and fly-tipping.
- 4.16 The WRAP report, published in June 2021 shows no evidence of a link between local authorities that have introduced charges and an increase in fly-tipping in their administrative areas. This evidence suggests that where a charge is applied (as opposed to a strict prohibition) there is little if any impact on fly-tipping.
- 4.17 For this reason, further analysis has been undertaken on the possibility of introducing a new charged for scheme for small businesses and sole traders.
- 4.18 Small traders who generate waste from small scale construction, refurbishment or landscaping activities are frequently poorly served by the commercial waste management market. The small quantities of waste they generate are often below minimum tonnages accepted at commercial waste disposal outlets and therefore the cost of disposal can be disproportionately high compared to larger businesses.
- 4.19 Those small traders that dispose of their waste responsibly and lawfully are also at risk of being undercut by less scrupulous traders using illegal means for disposing of waste.
- 4.20 Such a scheme would require a registration process and the installation of weighbridges at up to three HWRCs (subject to a review of site capacity) to allow traders to dispose of waste and be charged based on the volume deposited.
- 4.21 Following a review of schemes operated by other Councils for this purpose, and consultation with the current HWRC operator, five technical solutions for regulating access to HWRCs were identified and compared. This comparison included the analysis of the additional capital items required to introduce a new scheme for small businesses.
- 4.22 Details of this analysis can be found at appendix 2.
- 4.23 Based on the assumptions set out in appendix 2, introducing a small traders' scheme in parallel to introducing an ANPR system and vehicle

registration process delivers the greatest overall benefit.

# The net cost savings are estimated at up to £1.085m over 7 years, depending on options pursued

4.24 Table 1 summarises the Net Present Value (NPV) of the saving each option generates taking into account the different amounts of upfront investment and discounting future cashflows at 6.09% in accordance with best practice set out in the HMT Green Book.

Option	Y0-7 Average	Y1-7 Average	NPV	NPV/7
QR Code System	£0.199m	£0.229m	£1.180m	£0.169m
ANPR	£0.307m	£0.375m	£1.797m	£0.257m
ANPR + Automated Barriers	£0.260m	£0.344m	£1.515m	£0.216m
ANPR + Barriers + Additional Enforcement	£0.286m	£0.373m	£1.667m	£0.238m
ANPR + Small Traders Scheme	£0.309m	£0.395m	£1.805m	£0.258m

# Table 1: Financial Summary of Options

- 4.25 The financial analysis undertaken shows a modest financial benefit to the County through the introduction of a small traders' scheme having taken account of the additional capital expenditure required.
- 4.26 Based on the above analysis and with some allowance for uncertainty in the modelled values, net savings of £40k per annum in addition to the original £230k saving have been assumed as a consequence of introducing a small trader scheme. This would reduce the additional savings requirement to £330k.

# *In order to maximise benefits and minimise risks we need to consider different options carefully and consult on these*

- 4.27 Whilst there is a clear benefit to the users of a charged for scheme and a financial benefit to the County Council, there is the risk of an adverse impact on other users of the sites if the scheme leads to an overall increase in the number of users.
- 4.28 These potentially adverse impacts could be mitigated by limiting the scheme to businesses registered in the Derbyshire administrative area,

limiting the number of HWRCs where the scheme is in operation, or restricting scheme operation to off-peak times.

- 4.29 Price is also likely to influence uptake and careful consideration needs to be given to setting it at a level which covers the Council's costs, is economic for small traders, but not so attractive as to create an unintended additional draw for larger business with adequate existing commercially operated alternatives.
- 4.30 In order to develop effective implementation plans it is important to establish an accurate estimate of scheme uptake and detailed understanding of the likely patterns of use. In addition, a change to Council policy allowing access would be subject to a requirement to consult.
- 4.31 A decision to introduce a small traders' scheme including the additional capital investment in weighbridges, should not be taken ahead of completing a public consultation exercise which will last approximately 12 weeks. However, this need not delay the installation of ANPR technology which has been identified as the most efficient method of controlling access to sites with or without the introduction of a small traders' scheme.
- 4.32 The installation of ANPR technology has a minimum 12-week lead time. This report therefore seeks the necessary permissions to place the order with a supplier and install the basic technical solution now. This will also involve commencing the work to develop an online registration process for Derbyshire residents.
- 4.33 Rollout and enforcement of the registration process will not commence until the completion of formal consultation and a formal decision on the introduction of a small traders' scheme is taken.
- 4.34 Taking this approach would have the benefit of allowing valuable data to be gathered on the patterns of use across the County's HWRCs. Information on the frequency of use by individual vehicles would undoubtably be informative to the rollout of the residents' registration process and small traders' scheme.

# Other proposals for changes at HWRCs should be considered in parallel

- 4.35 In order to address the remaining savings required, two additional proposals are to be considered. These are:
  - Introduce limits on the types of material that can be accepted at HWRCs to exclude tyres and asbestos; and

- Reduce the opening hours of HWRCs.
- 4.36 As set out above, the County Council is not required to accept asbestos or tyres at HWRCs and the majority of neighbouring authorities either charge for accepting these materials or do not accept them at all.
- 4.37 When a commercial garage replaces vehicle tyres, it is responsible for the disposal of worn-out tyres. There are also nationally operated services to collect and dispose of tyres however these typically cost £6 per tyre.
- 4.38 Six of the nine waste disposal authorities directly bordering Derbyshire do not accept car tyres at their HWRCs and a seventh (Staffordshire) accept tyres for a charge of £4 per tyre. Only Greater Manchester and Kirklees accept domestic tyres without charge.
- 4.39 Cement bonded asbestos typically only arises from construction or demolition activity undertaken by a professional contractor. In these cases, it is the contractor's responsibly to dispose of the material safely. Where householders remove asbestos themselves it will be in small quantities and generated infrequently.
- 4.40 For this reason, every neighbouring WDA that accepts asbestos places strict limits on the volume of material accepted and the frequency. Of the six that accept asbestos at their HWRCs one charges a fee of £10 per sheet, and four limit the quantity to approximately 25kg in a six or twelve-month period.
- 4.41 Additional controls include requirements to book in advance. Restricting delivering to two-hour time windows or limiting the number of HWRCs where this material can be accepted.
- 4.42 Whilst the County Council already advertises a policy for accepting asbestos only once per household with no return visits, the absence of any booking process or recording process coupled with the universal acceptance of asbestos at every site makes this restriction difficult to enforce in practice.
- 4.43 Based on current contract prices and historic waste volumes, removing the current policy of accepting asbestos and tyres at HWRCs would save £69k in each subsequent full year.
- 4.44 Derbyshire's HWRCs open from 8:30am to 6pm daily (except Christmas Day, Boxing Day, and New Year's Day). This means each HWRC is open for 66.50 hours per week to accept waste from the public.

- 4.45 Benchmarking has been undertaken against all upper tier WDAs who publish their opening hours online. This covers 20 councils providing 277 HWRCs to a combined population of 9.11m residents.
- 4.46 Among these councils and HWRCs there are a broad range of opening hours including variations within the same authority, across the working week and seasonally.
- 4.47 Of the 20 councils studied, 13 closed one or more of the HWRCs at least one day per week. In total, 104 of the 277 HWRCs are closed at least one day per week and the majority are closed for two or more days.
- 4.48 More than half of the councils had some elements of seasonality with a reduction in opening hours in winter months.
- 4.49 The number of different schedules operated in each WDA area varies significantly with many splitting closure days across their portfolio of HWRCs to ensure some availability on every day of the week. One council with the most variation had 9 different opening schedules depending on the HWRC site and the time of year.
- 4.50 No other council operated all its HWRCs for the same hours 7 days per week, 52 weeks of the year.
- 4.51 By varying the opening hours across different sites, on different days and at different times of years, the vast majority of councils were able to provide the service with fewer hours of operation on average, 50.65 hours per week compared to 66.50 hours per week in Derbyshire.
- 4.52 Many have also been able to extend some hours of operation at a small number of their sites for one or two days per week in peak seasons, either in the morning or into the evening to extend the overall availability of the service.
- 4.53 Reducing the opening hours of HWRCs to the average would save approximately £340k per year. More modest reductions have been assumed within this proposal in order to achieve an annual saving of £261k per year.
- 4.54 Both proposals (restrictions on tyres and asbestos and reducing opening hours) would require public consultation prior to a final decision being taken and there is a range of options within each of the headline proposals which would benefit from public input. These 'sub-options' include introducing a charge for tyres and/or asbestos as an alternative to refusing to accept them, as well as seeking input on a broad range of possible opening schedules.

# *Estimated total potential savings are potentially up to £0.6m depending on options taken*

4.55 The total savings associated with the decisions sought are summarised below in Table 1.

	23/24 (£M)	24/25 (£M)	25/26 (£M)	26/27 (£M)	27/28 (£M)	Total
Existing Saving						
Restrict access to cross- border and commercial	0.230	-	-	-	-	0.230
Proposal 1						
Charging for usage by non-residents at HWRC'S	-	0.040	-	-	-	0.040
Proposal 2						
Limits on Materials at HWRC's	0.032	0.037	-	-	-	0.069
Proposal 3						
Reduced Opening Hours at HWRC's	0.196	0.065	-	-	-	0.261
Total	0.458	0.142	-	-	-	
Cumulative Total	0.458	0.600	0.600	0.600	0.600	

#### **Table 1: Cost Reduction Options**

- 4.56 Also included in the proposed consultation is adopting a standardised policy for the treatment of DIY waste in line with a recent central Government consultation.
- 4.57 A WDA may include in arrangements made under Section 51 of the Environmental Protection Act 1990 for HWRCs to be available for the deposit of household or other controlled waste by other persons on such terms as to payment (if any) as the authority determines. Many authorities use this provision to charge fees for materials from DIY work that is formally defined as construction and demolition waste however, the current Government's policy is that householders should not be charged to dispose of DIY waste at HWRCs.
- 4.58 Changes to legislation expected in the autumn will mean that construction waste should be considered DIY Waste (as set out in Appendix 2 and Appendix 4) and classified as household waste in the 2012 Regulations when the following criteria are met:
  - The construction waste is produced by householders whilst carrying out construction works themselves at their home. Construction is

defined in the 2012 Regulations as including improvement, repair or alteration.

- The construction waste is not produced as a result of commercial activities or by a commercial contractor charging for work in domestic premises.
- The construction waste is of a volume, up to two 50L rubble bags (or one bulky or fitted item no larger than 2,000mm by 750mm by 700mm, the approximate size of a bathtub or shower screen).
- The construction waste is not produced at a frequency greater than 4 visits per household over a 4-week period.
- 4.59 These criteria are intended to allow householders to deposit DIY waste for free (as it would be treated as household waste) but for local authorities to still be able to charge or refuse access for other construction waste, which is classified as industrial waste. For example, if a householder brought more than two rubble sacks of construction waste to the HWRC or brought construction waste to the HWRC on a regular basis, it would not be DIY waste and could be charged for. Equally, if a tradesperson brought any amount of construction waste, it would still be industrial waste.
- 4.60 The County Council does not currently apply charges to any DIY waste material but does apply restrictions on the quantity of different types of common DIY waste products. These restrictions set out in Appendix 5 are not formally adopted policy and are not well understood by residents.
- 4.61 It is proposed that during the consultation, the Council also seeks views on adoption of the definition of DIY waste proposed by central Government.

# 5. Consultation

- 5.1 As set out above it is proposed that the Council undertake consultation seeking resident input into the following broad topics:
  - a) Identification of any adverse impacts of the proposed ANPR system or possible barriers to use by any group or subset of residents, as well as possible mitigations to ensure equality of access to services.
  - b) Views of residents on allowing small businesses and sole traders access to a charged-for waste disposal service at a limited number of HWRC sites.
  - c) Identification of demand for a charged-for service for disposing of asbestos and/or tyres (as opposed to strict prohibition).

- d) Identification of preferences among residents for which hours/days HWRC operation should be reduced. Residents will be asked to express a preference from a range of options consistent with the budget saving currently under consideration.
- e) Views on whether residents would prefer alternative means of achieving the same broad quantum of financial savings.
- f) Views on the central Government definition of household waste in relation to waste from DIY projects, and its possible application in Derbyshire.
- 5.2 The proposed consultation will also seek additional information covering:

a) Patterns of HWRC use.

- b) Types of HWRC user (resident/non-resident/commercial/domestic).
- c) Attitudes towards recycling.
- 5.3 A draft online survey has been produced, along with supporting material to allow residents to give informed views. It is proposed the consultation is undertaken over 12 weeks from 10 August 2023 to 2 November 2023.
- 5.4 An end-of-consultation report will be produced in the last two weeks of November 2023 and reported back to Cabinet along with any further recommendations arising from the consultation.

# 6. Alternative Options Considered

- 6.1 **Option 1:** Do nothing.
- 6.2 The budget set for 2023/24 onwards is predicated on the delivery of £458k of savings, increasing to £600k in 2024/25. Delivering these savings requires the implementation of the proposals set out in this report, or the adoption of alternatives which have previously been discounted.
- 6.3 Do nothing is therefore not considered to be a viable option and is not recommended.
- 6.4 **Option 2:** Proceed with implementation of the existing savings before moving to consult on new proposals.
- 6.5 This option is not recommended because elements of the new proposals for 2023/24 significantly impact how the Council would deliver the pre-existing savings proposal (£0.230m). In particular, introducing a scheme to charge small traders for the use of HWRCs would run

counter to more stringent enforcement of the existing policy that only domestic waste be accepted at HWRCs.

- 6.6 It would be practically challenging and inefficient to introduce the preexisting budget saving proposal, thereby forcing small traders away from HWRC use, to then encourage them back under a charging scheme within a matter of months.
- 6.7 **Option 3:** Undertake consultation on introducing a small traders' scheme followed by one or more, separate consultation exercises on the savings proposals for 2023/24 onwards and adopting the Government's definition of DIY waste.
- 6.8 Whilst this option would avoid the problem described at 6.6 above, the option is not recommended because it is important for consultees to be presented with the entirety of proposals, rather than undertaking a series of separate consultation exercises in order to allow for intelligent consideration of each.
- 6.9 Consolidating consultation into a single exercise will also reduce the cost, both in terms of expediency in delivering savings (including amounts undelivered from previous financial years) and in terms of the cost of undertaking multiple consultation and communication exercises.

#### 7. Implications

- 7.1 Appendix 1 sets out the relevant implications considered in the preparation of the report.
- 8. Background Papers
- 8.1 None.

# 9. Appendices

- 9.1 Appendix 1 Implications
- 9.2 Appendix 2 Background and Analysis
- 9.3 Appendix 3 Financial Comparison of Options.
- 9.4 Appendix 4 List of Material to be Treated as Household Waste.
- 9.5 Appendix 5 Derbyshire County Council HWRC Material Restrictions.
- 9.6 Appendix 6 Draft Equality Impact Assessment

# 10. Recommendations

#### 10.1 That Cabinet:

- a) Approves spend of up to £20,000 from the current Resources and Waste reserve and up to £180,000 from an existing waste capital project (subject to approval of the next quarterly capital monitoring report) to install Automatic Number Plate Recognition systems, back-office integrations and customer facing web portal and the addition of this project to the 2022/23 Capital Programme.
- b) Agrees to conduct a public consultation in relation to the implementation of the existing budget saving and budget saving options put forward as part of the 2023-24 budget setting process. Namely: charging for usage of HWRCs by non-residents, limiting the materials accepted on-site, reducing the opening hours of HWRCs.

#### 11. Reasons for Recommendations

- 11.1 Delivery of the existing £230k saving requires the installation of ANPR systems and the development of electronic processes for residents to register their vehicles. Recommendation a) is made because the value of spend required exceeds delegated departmental authorities.
- 11.2 Recommendation b) is made because budget savings currently under consideration constitute changes to Council Policy and therefore require consultation. Undertaking consultation on all prospective changes in a single exercise will expedite any subsequent implementation periods and allow residents to respond to the full range of considerations affecting their use of HWRCs in the future.
- 11.3 In addition, elements of the new proposals for 2023/24 significantly impact how the Council would deliver the pre-existing savings proposal (£0.230m). In particular, introducing a scheme to charge small traders for the use of HWRCs would run counter to more stringent enforcement of the existing policy that only domestic waste be accepted at HWRCs.
- 11.4 It would be practically challenging and inefficient to introduce the preexisting budget saving proposal, thereby forcing small traders away from HWRC use, to then encourage them back under a charging scheme within a matter of months.
- 11.5 In order for consultation to allow intelligent consideration by members of the public, it is also important for responders to be presented with the entirety of proposals under consideration, rather than undertaking a series of separate consultation exercises.

11.6 Consolidating consultation into a single exercise will also reduce the cost, both in terms of expediency in delivering savings (including amounts undelivered from previous financial years) and in terms of the cost of undertaking multiple consultation and communication exercises.

# 12. Is it necessary to waive the call in period?

12.1 No

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#### **Implications**

#### Financial

- 1.1 The department has had a cut of £0.230k in 2021/22 for savings that would be derived from implementing this scheme. This investment will enable the achievement of that saving.
- 1.2 £0.020m has been earmarked from the Place Department Waste Initiative Reserve to fund non-capital up-front costs of implementation.
- 1.3 £0.180m of capital funding has been identified to be diverted from an existing Waste capital project. A separate report will be prepared for Cabinet seeking approval to repurpose this capital funding.

#### Legal

- 2.1 The Council has a duty under Section 51(1)(b) of the Environmental Protection Act 1990 to provide places where residents of its area may deposit their household waste. The Council has the discretion to make charges for waste not deemed to be household waste and to persons who are not resident in its area.
- 2.2 These proposals relate to a universal service delivered under statute, and where they concern a change to policy or reduction in service, there would be a reasonable expectation from residents of Derbyshire that they be consulted.
- 2.3 There is also a requirement that the outcome of consultation be conscientiously considered when the ultimate decision is made. It would therefore not be appropriate to undertake a consultation after the decision to implement the proposals upon which the Council intends to consult.
- 2.4 It is also important that sufficient information be given to allow intelligent consideration by the consultees. This does not preclude undertaking consultation in stages however it is plausible that a reasonable person might view any one of the proposals differently in light of the others. It is questionable whether it is appropriate to undertake a number of discrete consultations on connected proposals over a relatively short space of time.
- 2.5 The proposals in relation to restricting access to HWRCs are not subject to a requirement to consult. However, consultation on this aspect may reveal additional information that would help the Council to mitigate

potentially adverse impacts. These are specifically in relation to additional barriers some residents might encounter if a digital only registration process were introduced.

#### **Human Resources**

3.1 None.

# **Information Technology**

4.1 None.

# **Equalities Impact**

- 1.4 An initial Equalities Impact Assessment (EIA) has been undertaken which identifies possible adverse impacts affecting groups with the following protected characteristics:
  - a) Age
  - b) Disability
  - c) Race & Ethnicity
  - d) Sex or Gender
  - e) Rural Communities
- 1.5 The adverse impacts identified relate primarily to digital inclusion and the additional barriers these groups may face if the Council were to introduce a digital only process. Additional communication barriers may also impact residents whose first (or only) language is not English, or residents with sensory impairments.
- 1.6 Mitigations have been identified, in particular, the provision of alternative non-digital registration processes.
- 1.7 The EIA also identifies the need for further information to support the design and implementation of mitigations. A 12-week consultation has been proposed and permission sought from Cabinet to proceed with this.

#### Corporate objectives and priorities for change

6.1 This proposal will help deliver the following Council Plan priorities: High Performing, Value for Money and Resident-Focused Services; A Prosperous and Green Derbyshire.

# Other (for example, Health and Safety, Environmental Sustainability, Property and Asset Management, Risk Management and Safeguarding)

# Data Protection (GDPR)

- 7.1 A Data Protection Screening has been undertaken and identifies a need to conduct a full Data Protection Impact Assessment (DPIA). In order to complete a DPIA further work is required in parallel to the development of a technical specification.
- 7.2 This will require input from the supplier and technical advice from the Councils own Granicus development team.

# Background and Analysis

#### 1. Policy Context:

- 1.1 Derbyshire County Council is a Waste Disposal Authority ("WDA") with statutory duties to arrange for the disposal of Local Authority Collected Municipal Waste ("LACMW"). Under s.51 of the Environmental Protection Act 1990, it is the duty of all WDAs to provide places for residents in its area to deposit household waste and to arrange for its disposal. These Household Waste Recycling Centres ("HWRC") must operate free of charge, be situated in a reasonably accessible location and be open at all reasonable times.
- 1.2 Derbyshire County Council provides nine HWRCs across its administrative area, eight operated under contract by the waste management company HW Martin, and one operated under contract by Suez Recycling and Recovery UK Ltd.
- 1.3 These sites currently receive approximately 85,000 tonnes of waste and recyclates each year as set out below in Table 1.

	inageo			% of total
Site	Mar-18	Mar-22	% increase	increase
Chesterfield	11,533.38	13,185.62	14.33%	7.78%
Ilkeston	7,495.40	8,482.66	13.17%	4.65%
Loscoe	12,674.26	14,208.17	12.10%	7.22%
Ashbourne	4,345.94	8,605.10	98.00%	20.05%
Bretby	6,970.01	10,884.85	56.17%	18.43%
Bolsover	8,536.69	10,501.61	23.02%	9.25%
Glossop	3,257.52	6,733.79	106.72%	16.37%
Waterswallows	6,285.23	8,371.11	33.19%	9.82%
Northwood	4,989.05	6,354.76	27.37%	6.43%
Total	66,087.48	87,327.67	32.14%	100.00%

# Table 1: HWRC Tonnages

- 1.4 As Local Authority budgets have reduced, there has been a general and widespread trend towards adopting much narrower interpretations of the duties imposed by s.51, either by taking proactive steps to limit use of HWRCs exclusively for residents of the WDA area, rejecting materials that can be technically classified as non-household waste such as tyres or asbestos, or implementing charges for certain materials such as rubble.
- 1.5 A WDA may include arrangements made under s.51 to be available for the deposit of household or other controlled waste by other persons on

such terms as to payment (if any) as the authority determines. Many authorities use this provision to charge fees for materials from DIY work that is formally defined as construction and demolition waste however, the current Government's policy that householders should not be charged to dispose of DIY waste at HWRCs.

- 1.6 Changes to legislation expected in the autumn will mean that construction waste should be considered DIY Waste (as set out in Appendix 2 and Appendix 4) and classified as household waste in the 2012 Regulations when the following criteria are met:
  - The construction waste is produced by householders whilst carrying out construction works themselves at their home. Construction is defined in the 2012 Regulations as including improvement, repair or alteration.
  - The construction waste is not produced as a result of commercial activities or by a commercial contractor charging for work in domestic premises.
  - The construction waste is of a volume, up to two 50L rubble bags (or one bulky or fitted item no larger than 2,000mm by 750mm by 700mm, the approximate size of a bathtub or shower screen).
  - The construction waste is not produced at a frequency greater than 4 visits per household over a 4-week period.
- 1.7 These criteria are intended to allow householders to deposit DIY waste for free (as it would be treated as household waste) but for local authorities to still be able to charge or refuse access for other construction waste, which is classified as industrial waste. For example, if a householder brought more than two rubble sacks of construction waste to the HWRC or brought construction waste to the HWRC on a regular basis, it would not be DIY waste and could be charged for. Equally, if a tradesperson brought any amount of construction waste, it would still be industrial waste.
- 1.8 Other types of restrictions to accessing HWRC sites are also imposed by many WDAs. A number of authorities implemented booking systems as a means of mitigating transmission risks during the Covid-19 pandemic including Derby City Council. The bookings process allocates time slots for residents to use the facilities which substantially reduces delays accessing the site and related traffic disruptions. They also benefit the Councils who use them by providing a verification process to ensure only residents are able to access the sites.

- 1.9 The Government has also launched a call for evidence in relation to such schemes citing increasing concern that in some cases booking systems are discouraging HWRC use with a risk of harming recycling rates and increasing fly-tipping.
- 1.10 A range of similar systems are deployed by WDAs across the country to enforce policies on who may use HWRC facilities. These include:
  - Proof of residency checks at site
  - Paper based permit schemes either for all users or applied to certain vehicle type
  - Electronic or QCR code permitting schemes
  - Digital booking systems
  - Automatic Number Plate Recognition ("ANPR") camera systems either as a standalone data capturing system or linked to digital vehicle registration systems

# 2. Current Derbyshire County Council Policy:

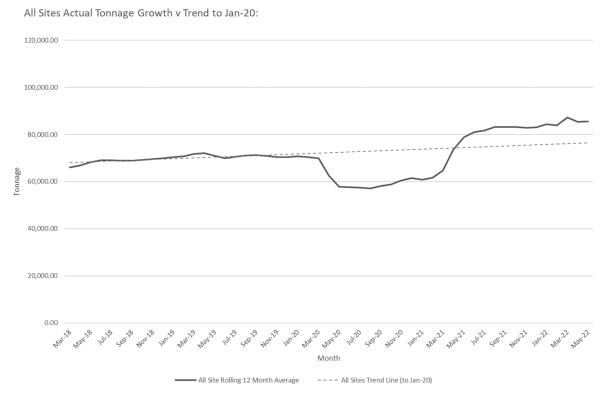
- 2.1 Derbyshire County Council has chosen not to implement any of the measures outlined above and by comparison with neighbouring WDAs has a comparatively relaxed policy with regard to waste acceptance.
- 2.2 Appendix 3 sets out the current restrictions and allowances that apply to waste accepted at Derbyshire HWRCs. Derbyshire County Council is not currently obligated to accept any of the 30 types of material or item listed in Appendix 3 and could adopt a policy to refuse them entirely or apply a charge. Whilst some limitations do apply only six of the materials/items are not accepted at all, and none are subject to a charge.
- 2.3 Derbyshire County Council has also taken a relatively minimal approach to enforcement of its own policy with no established system in place to regulate or monitor site usage. Prevention of tradespeople and local waste removal companies exploiting the HWRC provision is largely left to on site personnel employed by the site operators.

#### 3. Financial Impact

3.1 Between February 2018 and February 2020, waste volumes passing through Derbyshire County Councils HWRCs grew at an underlying rate of 3.2% per year. This can be seen in the rolling twelve-month total waste volumes across all sites in Figure 1 below. From March 2020 the effects of the nationwide lockdown and broader pandemic impacts on site operation can be seen as a sharp reduction in waste volumes and a clear trough. By April 2021 the annual totals had increased to prepandemic levels.

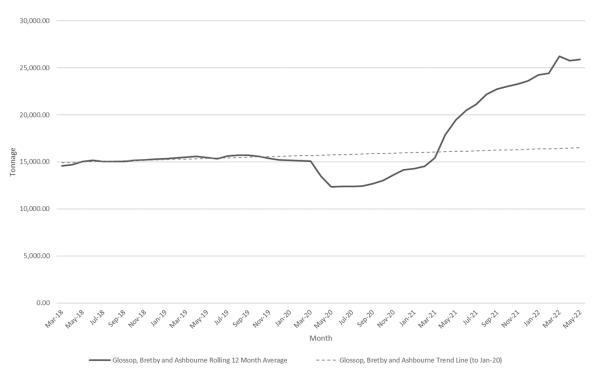
3.2 Waste volumes then continued to grow at an accelerated rate outstripping the previously observed underlying trend and in stark contrast to the twelve months preceding the pandemic when waste volumes were largely flat.

# Fig 1: Changes in HWRC Waste Volume Over Time (all sites) – Rolling 12 Month Average:



- 3.3 Analysis of individual sites summarised in Table 1 and illustrated by Figure 2 show that this additional unexplained growth is almost entirely attributable to three HWRC sites; Glossop, Bretby and Ashbourne.
- 3.4 The additional tonnage over and above the pre-pandemic forecast for May 2022 across all sites is 9,158 tonnes. By the same measure, the additional tonnage generated at those three sites was 9,407 tonnes. Whilst it would be overly simplistic to infer that all the additional unexplained growth occurred in just three sites, this data strongly suggests the broader drivers of HWRC volume increases affect these three sites in particular.

# Fig 2: Changes in HWRC Waste Volume Over Time (Glossop, Bretby and Ashbourne):



Glossop, Bretby and Ashbourne Actual Tonnage Growth v Trend to Jan-20:

- 3.5 At an average cost per tonne of £87.08 the financial impact of this additional waste is between £0.800m and £0.820m per annum.
- 3.6 Given the comparatively generous acceptance policy of the Council's HWRCs coupled with the limited enforcement against non-household use, it is likely that the additional waste is the result of residents across the borders in Staffordshire and Greater Manchester using Derbyshire facilities and trades people from both within and outside the Derbyshire border.

#### 4. Options

4.1 In order to determine the most effective and efficient means of regulating access to HWRCs, five options have been evaluated. The assumptions made and results of this evaluation are set out below.

#### **Option 1:**

4.2 Registration system based on QR code verification on site. Residents register their vehicle against their home address with validation based on Council tax unique identifiers. The registration process will be based on a webform built in Granicus, however it is proposed that a telephone registration process (using the same webform but with call handler data entry) be provided as an alternative option.

- 4.3 Registration provides resident with unique QR code which can be stored as a pdf or printed. Either can be presented on site to verify resident status using tablets carried by site operatives.
- 4.4 Verification would not happen to every visitor owing to the additional delays to entering site becoming prohibitive. Operatives would verify a sample or check visitors where there are other reasons to challenge their use of the site e.g. waste composition or vehicle type. As a result, it is assumed this option would be less successful at preventing target waste entering site compared to more automated systems.
- 4.5 Fixed costs of on-site staffing would also be increased.

#### **Option 1 Key Assumptions:**

- 4.6 The following assumptions have been applied to the costs and benefits of implementing Option 1:
  - a) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from cross-border deliveries.
  - b) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from trade deliveries.
  - c) That 50% of cross-border deliveries would be avoided.
  - d) That 50% of trade deliveries would be avoided.
  - e) That the average per tonne cost of trade and cross-border deliveries are consistent with the average cost per tonne of all deliveries into HWRCs £87.08.

#### Option 1 Capex and Y0 Cost:

		Cost pe	er		Total a	ssumed	Asset	
Item		site	QTY	Continger	ncy cost		Life	Indexation
Granicus Deve	lopment	£1	0,000 1		5%	£10,500	3	5%
Option 1 Cashf	low:							
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Capex	£0.011m	£0.000m	£0.000m	£0.012m	£0.000m	£0.000m	£0.014r	n £0.000m
Opex	£0.000m	£7.471m	£7.605m	£7.795m	£7.990m	£8.189m	£8.394r	n £8.604m
Salaries & Staffing	£0.000m	£0.077m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029r	n £0.030m
No Payroll Labour Cost	£0.000m	£0.123m	£0.126m	£0.129m	£0.132m	£0.136m	£0.139r	n £0.143m
Running Costs	£0.000m	£0.010m	£0.011m	£0.011m	£0.011m	£0.011m	£0.012r	n £0.012m

Variance to Baseline	£0.011m	£(0.172)m	£(0.229)m	£(0.222)m	£(0.240)m	£(0.246)m	£(0.238)m	£(0.259)m
Net Cost	£0.011m	£7.471m	£7.605m	£7.807m	£7.990m	£8.189m	£8.408m	£8.604m
HWRC Waste Disposal	£0.000m	£7.260m	£7.442m	£7.628m	£7.819m	£8.014m	£8.214m	£8.420m

#### **Option 2a:**

- 4.7 As with Option 1 residents register their vehicle against their home address with validation based on Council tax unique identifiers.
- 4.8 The details of the vehicle will be recorded in a controlled data base. ANPR cameras situated at the entrance to each HWRC would read the number plates of vehicle prior to entering site. The ANPR system would query the database of registered vehicles and if the vehicle was not registered, operatives on site would be alerted via their hand-held tablets.
- 4.9 This system would allow verification of all visitors to site (travelling by car).
- 4.10 Because the system automates the vast majority of verification steps on site, it is assumed that the scheme could operate without additional on-site staffing and would be more successful at identifying target waste.
- 4.11 A variant on this system could also support inter authority charges to allow residents in neighbouring WDA areas to access Derbyshire HWRCs. It is not proposed that this option be developed as part of the initial project, however it may be an avenue to better value for money for the public purse in future.
- 4.12 The upfront capital costs of option 2a are significantly larger than for option 1 as a result. Options 2b and 2c are variant on this same basic system.

#### **Option 2a Key Assumptions:**

- 4.13 The following assumptions have been applied to the costs and benefits of implementing Option 2a:
  - a) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from cross-border deliveries.
  - b) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from trade deliveries.
  - c) That 60% of cross-border deliveries would be avoided.

- d) That 60% of trade deliveries would be avoided.
- e) That the average per tonne cost of trade and cross-border deliveries are consistent with the average cost per tonne of all deliveries into HWRCs £87.08.

ltem	Cost per site	QTY	Contingency	Total assumed cost	Asset Life	Indexation
Cameras and civils	£3,750	9	15%	£38,813	7	5%
Server & Software	£90,000	1	10%	£99,000	4	5%
Firewalls & Switches	£10,000	1	10%	£11,000	4	5%
Granicus Development	£10,000	1	5%	£10,500	3	5%
System Integration	£10,000	1	5%	£10,500	3	5%

#### **Option 2a Capex and Y0 Cost:**

# **Option 2 Cashflow:**

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Capex	£0.170m	£0.000m	£0.000m	£0.024m	£0.134m	£0.000m	£0.028m	£0.055m
Opex	£0.000m	£7.307m	£7.437m	£7.623m	£7.813m	£8.009m	£8.209m	£8.414m
Salaries & Staffing	£0.000m	£0.077m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
No Payroll Labour Cost	£0.000m	£0.021m	£0.021m	£0.022m	£0.022m	£0.023m	£0.023m	£0.024m
Running Costs	£0.000m	£0.026m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
HWRC Waste Disposal	£0.000m	£7.184m	£7.363m	£7.547m	£7.736m	£7.930m	£8.128m	£8.331m
Net Cost	£0.170m	£7.307m	£7.437m	£7.647m	£7.947m	£8.009m	£8.237m	£8.469m
Variance to Baseline	£0.170m	£(0.335)m	£(0.396)m	£(0.382)m	£(0.283)m	£(0.427)m	£(0.409)m	£(0.394)m

# **Option 2b:**

- 4.14 Option 2b has been evaluated to assess the impact additional capital spend would have on the overall saving profile of an ANPR based system. Option 2b is largely the same as option 2a but incorporates the use of automated barriers on site in the event these were needed to achieve the 60% reduction in non-resident HWRC use.
- 4.15 Residents register their vehicle against their home address with validation based on Council Tax unique identifiers.
- 4.16 The details of the vehicle will be recorded in a controlled data base. ANPR cameras situated at the entrance to each HWRC would read the number plates of vehicle prior to entering site. The ANPR system would query the database of registered vehicles and if the vehicle was not

registered, the automated gates to site would remain closed and operatives on site would be alerted via their hand-held tablets.

- 4.17 This system would allow verification of all visitors to site (travelling by car) and also prevent waste being deposited before site operatives have been able to intercept the visitor in question.
- 4.18 Because the system automates the vast majority of verification steps on site, it is assumed that the scheme could operate without additional on-site staffing and would be more successful at identifying target waste.
- 4.19 The upfront capital costs of option 2b are larger than 2a as a result of the addition of automated barriers. No additional performance benefit has been assumed in option 2b (over and above option 2a).

#### **Option 2b Key Assumptions:**

- 4.20 The following assumptions have been applied to the costs and benefits of implementing Option 2b:
  - a) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from cross-border deliveries.
  - b) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from trade deliveries.
  - c) That 60% of cross-border deliveries would be avoided.
  - d) That 60% of trade deliveries would be avoided.
  - e) That the average per tonne cost of trade and cross-border deliveries are consistent with the average cost per tonne of all deliveries into HWRCs £87.08.
  - f) That in order to achieve the 60% reduction in trade and crossborder deliveries automated barriers would be required at each site.

ltem	Cost per site	QTY	Contingency	Total assumed cost	Asset Life	Indexation
Cameras and civils	£3,750	9	15%	£38,813	7	5%
Server & Software	£90,000	1	10%	£99,000	4	5%
Firewalls & Switches	£10,000	1	10%	£11,000	4	5%
Barriers	£15,000	9	15%	£155,250	7	5%
Granicus Development	£10,000	1	5%	£10,500	3	5%

#### **Option 2b Capex and Y0 Cost:**

System Integration	£10,000	1	5%	£10,500	3	5%

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Capex	£0.325m	£0.000m	£0.000m	£0.024m	£0.134m	£0.000m	£0.028m	£0.273m
Opex	£0.000m	£7.307m	£7.437m	£7.623m	£7.813m	£8.009m	£8.209m	£8.414m
Salaries & Staffing	£0.000m	£0.077m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
No Payroll Labour Cost	£0.000m	£0.021m	£0.021m	£0.022m	£0.022m	£0.023m	£0.023m	£0.024m
Running Costs	£0.000m	£0.026m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
HWRC Waste Disposal	£0.000m	£7.184m	£7.363m	£7.547m	£7.736m	£7.930m	£8.128m	£8.331m
Net Cost	£0.325m	£7.307m	£7.437m	£7.647m	£7.947m	£8.009m	£8.237m	£8.687m
Variance to Baseline	£0.325m	£(0.335)m	£(0.396)m	£(0.382)m	£(0.283)m	£(0.427)m	£(0.409)m	£(0.175)m

# **Option 2b Cashflow:**

# **Option 2c:**

- 4.21 Option 2c is largely the same as Options 2a and 2b but seeks to increase the percentage of target waste that is avoided by introducing an additional enforcement regime to tackle persistent abusers of the HWRC service.
- 4.22 The current HWRC operator has similar schemes in place in which the enforcement authority employs an enforcement officer who is seconded to the commercial operator. The benefits of this approach are continued access the authority's full powers and information systems. Their experience has shown that in addition to preventing waste from entering the HWRC system, this approach can also yield broader positive results in tackling enviro-crime in the area.
- 4.23 A 10% additional reduction in the target waste entering site has been assumed within this model. As with Option 2b, the overall financial benefit appears smaller than option 2a because of the avoided capital cost associated with the barrier system which is modelled in option 2b and 2c. This depends in large part on the assumption that option 2a will be able to achieve the full 60% reduction in target materials without the added controls put in place by Option 2b and 2c. It may be that either or both of these variants may be considered as part of a second stage following evaluation of the scheme post-implementation.
- 4.24 The upfront capital costs of Option 2c are identical to Option 2b.

# **Option 2c Key Assumptions:**

- 4.25 The following assumptions have been applied to the costs and benefits of implementing Option 2c:
  - a) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from cross-border deliveries.
  - b) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from trade deliveries.
  - c) That 60% of cross-border deliveries would be avoided.
  - d) That 60% of trade deliveries would be avoided.
  - e) That the average per tonne cost of trade and cross-border deliveries are consistent with the average cost per tonne of all deliveries into HWRCs £87.08.
  - f) That in order to achieve the 60% reduction in trade and crossborder deliveries automated barriers would be required at each site.
  - g) That a further 10% reduction in both trade and cross-border deliveries can be achieved by employing one full time enforcement officer.

Item	Cost per site	QTY	Contingency	Total assumed cost	Asset Life	Indexation
Cameras and civils	£3,750	9	15%	£38,813	7	5%
Server & Software	£90,000	1	10%	£99,000	4	5%
Firewalls & Switches	£10,000	1	10%	£11,000	4	5%
Barriers	£15,000	9	15%	£155,250	7	5%
Granicus Development	£10,000	1	5%	£10,500	3	5%
System Integration	£10,000	1	5%	£10,500	3	5%

#### **Option 2c Capex and Y0 Cost:**

# **Option 2c Cashflow:**

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Capex	£0.325m	£0.000m	£0.000m	£0.024m	£0.134m	£0.000m	£0.028m	£0.273m
Opex	£0.000m	£7.280m	£7.409m	£7.594m	£7.784m	£7.979m	£8.178m	£8.383m
Salaries & Staffing	£0.000m	£0.077m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
No Payroll Labour Cost	£0.000m	£0.070m	£0.071m	£0.073m	£0.075m	£0.077m	£0.079m	£0.081m
Running Costs	£0.000m	£0.026m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m

HWRC Waste Disposal	£0.000m	£7.107m	£7.285m	£7.467m	£7.654m	£7.845m	£8.041m	£8.242m
Net Cost	£0.325m	£7.280m	£7.409m	£7.619m	£7.918m	£7.979m	£8.206m	£8.656m
Variance to Baseline	£0.325m	£(0.362)m	£(0.424)m	£(0.410)m	£(0.312)m	£(0.457)m	£(0.440)m	£(0.207)m

# Option 3:

- 4.26 Option 3 takes the Option 2a assumptions as its starting point but incorporates a charge for commercial waste disposal option at three sites. The proposal has been submitted as part of the 2023/23 budget setting process and at the time of writing has not been approved.
- 4.27 Because delivery of this saving (if approved) would have a material effect on the savings associated with preventing traded access to sites, it has been analysed and presented here. There would be a good rationale for introducing a charged for scheme at the same time as strengthening enforcement of the existing policy.
- 4.28 In this proposal, traders who wish to use the service register their vehicles in the same way as residents in Options 2a, 2b and 2c in order to gain access to site, but this would be restricted to three sites that have space for weighbridges. The traders would weigh their vehicles before and after depositing waste and be charge per tonne of material deposited.

#### **Option 3 Key Assumptions:**

- 4.29 The following assumptions have been applied to the costs and benefits of implementing Option 3:
  - a) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from cross-border deliveries.
  - b) That 5% (4,231 tonnes pa) of baseline HWRC tonnage arises from trade deliveries.
  - c) That 60% of cross-border deliveries would be avoided.
  - d) That 060% of trade deliveries would be avoided.
  - e) That the average per tonne cost of trade and cross-border deliveries are consistent with the average cost per tonne of all deliveries into HWRCs £87.08.
  - f) That an average per tonne mark-up on trade waste of 40% could be achieved to cover fixed costs of the HWRC service and repayment of additional capex.

g) That the volume of waste deposited via this scheme will be broadly equal to the amount prevented from entering HWRCs under Option 2a, 2b and 2c.

Item	Cost per site	QTY	Contingency	Total assumed cost	Asset Life	Indexation
Cameras and civils	£3,750	9	15%	£38,813	7	5%
Server & Software	£90,000	1	10%	£99,000	4	5%
Firewalls & Switches	£10,000	1	10%	£11,000	4	5%
Barriers	£15,000	9	15%	£155,250	7	5%
Weighbridge	£35,000	3	15%	£120,750	7	5%
Granicus Development	£10,000	1	5%	£10,500	3	5%
System Integration	£10,000	1	5%	£10,500	3	5%

# **Option 3 Capex and Y0 Cost:**

# **Option 3 Cashflow:**

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Capex	£0.291m	£0.000m	£0.000m	£0.024m	£0.134m	£0.000m	£0.028m	£0.225m
Opex	£0.000m	£7.267m	£7.396m	£7.580m	£7.770m	£7.964m	£8.163m	£8.367m
Salaries & Staffing	£0.000m	£0.077m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
No Payroll Labour Cost	£0.000m	£0.072m	£0.074m	£0.075m	£0.077m	£0.079m	£0.081m	£0.083m
Running Costs	£0.000m	£0.026m	£0.026m	£0.027m	£0.028m	£0.028m	£0.029m	£0.030m
HWRC Waste Disposal	£0.000m	£7.092m	£7.269m	£7.451m	£7.637m	£7.828m	£8.024m	£8.225m
Net Cost	£0.291m	£7.267m	£7.396m	£7.605m	£7.904m	£7.964m	£8.191m	£8.592m
Variance to Baseline	£0.291m	£(0.376)m	£(0.438)m	£(0.424)m	£(0.326)m	£(0.472)m	£(0.455)m	£(0.271)m

# Appendix 3

# Financial Comparison of Options

	YU-/											
Option	Average	NPV/7	NPV	IRR	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Baseline					£0.000m	£7.642m	£7.833m	£8.029m	£8.230m	£8.436m	£8.647m	£8.863m
Option 1	£0.199m	£0.169m	£1.180m	1665%	£(0.011)m	£0.172m	£0.229m	£0.222m	£0.240m	£0.246m	£0.238m	£0.259m
Option 2a	£0.307m	£0.257m	£1.797m	207%	£(0.170)m	£0.335m	£0.396m	£0.382m	£0.283m	£0.427m	£0.409m	£0.394m
Option 2b	£0.260m	£0.216m	£1.515m	109%	£(0.325)m	£0.335m	£0.396m	£0.382m	£0.283m	£0.427m	£0.409m	£0.175m
Option 2c	£0.286m	£0.238m	£1.667m	117%	£(0.325)m	£0.362m	£0.424m	£0.410m	£0.312m	£0.457m	£0.440m	£0.207m
Option 3	£0.309m	£0.258m	£1.805m	136%	£(0.291)m	£0.376m	£0.438m	£0.424m	£0.326m	£0.472m	£0.455m	£0.271m

# List of Material to be Treated as Household Waste

Waste Types in Scope	Products in Scope				
Plastic or fibreglass	Shower trays				
	Bath – plastic				
	Shower screen				
	Guttering				
	Drainage and sewer pipes				
Other	Insulation material				
	Roofing felt				
	Carpet & linoleum				
Rubble					
Bricks					
Hardcore					
Concrete	Breeze blocks				
	Paving slabs				
	Lintels				
	Mortar and rendering				
	Cement board				
	Mixed or powder				
Glass	Plate/sheet glass				
	Shower screen				
	Tiles				
	Furniture shelving, table tops				
Gravel	Construction or landscaping gravel or pebbles				
Pottery, ceramic and	Bath				
porcelain	Bidet				
	Shower tray				
	Sink or wash hand basin with pedestal				
	Tiles (floor, wall)				
	Toilet with cistern				
	Drainage and sewer pipes				
Sand	Sharp				
	Play pit				
	Sandbags (used flood defence by householders)				

Slate	Roof/slate			
Soil	Soil and clay			
Stone	Flagstones			
Tarmac				
Turf				
Tile	Floor/wall/roof			
Plaster and gypsum-based items				

# Derbyshire County Council HWRC Material Restrictions

Material/Item:	Derbyshire County Council Policy:
<b>Construction and</b>	Demolition Waste
Rubble, bricks, plasterboard and soil	Maximum 50kg per week (2x 25kg potato bag size or equivalent in smaller bags)
Asbestos - roof sheets, down pipes and guttering, smaller household items	Maximum 2 roofing sheets or 2m pipe/guttering arising from replacement by the householder due to normal wear and tear, smaller asbestos items from a household source such as ironing boards will be accepted - one off, no return. A member of site staff should be approached and informed about the asbestos nature of the waste prior to disposing in a container. The waste must be double wrapped and secured in plastic sheeting by the householder prior to arrival at site or it will not be accepted.
Non-asbestos roof sheets, down pipes and guttering	Maximum 2 roofing sheets or 2m pipe/guttering arising from replacement by the householder due to normal wear and tear - one off, no return. If there is the slightest uncertainty whether the material contains asbestos it must be double wrapped and secured in plastic sheeting by the householder prior to arrival at site or it will not be accepted
Window frames with or without glass	Maximum 2 units arising from replacement by the householder due to normal wear and tear- one off, no return
Doors interior/ exterior with or without glass	Maximum 2 units arising from replacement by the householder due to normal wear and tear - one off, no return
Roof/wall cavity insulation	Should be contained within sealed bags, maximum 2x 25kg potato sack size bags or equivalent - one off, no return
Items of fitted furniture incl. kitchen units	Maximum 1 unit arising from replacement by the householder due to normal wear and tear- one off, no return
Garden fence panels/posts	Maximum 1 fencing panel and 2 posts arising from replacement by the householder due to normal wear and tear - one off, no return.
Timber/plastic garden decking	Maximum 2 broken decking boards arising from replacement by the householder due to normal wear and tear - one off, no return

Bathroom suites	Maximum 1 item only arising from replacement by the householder due to normal wear and tear, an entire suite will not be accepted - one off, no return
Building demolition waste - sheds, green- houses etc	Maximum 1 panel or door arising from replacement by the householder due to normal wear and tear will be accepted - one off, no return
Domestic electric/gas central heating wall fixed heaters	Maximum 1 heater arising from replacement by the householder due to normal wear and tear will be accepted- one off, no return
Solar panels	1 component part only arising from replacement by the householder due to normal wear and tear, complete unit not accepted - one off, no return
Wind turbines	1 component part only arising from replacement by the householder due to normal wear and tear, complete unit not accepted - one off, no return
External satellite dishes and TV aerials	Maximum 1 accepted arising from replacement by the householder- one off no return
Domestic heating oil/gas tanks	None accepted
Exterior hot tubs	1 component part only arising from replacement by the householder due to normal wear and tear, complete unit will not be accepted - one off, no return
Stair lifts	None accepted
Other Materials	
Scrap vehicles and vehicle parts, oils and lubricants (including vehicles of a similar nature e.g. mobility scooters and electronic wheelchairs)	Entire vehicles, complete engines/motors or other components which may contain unspecified hazardous materials will not be accepted. Vehicle batteries, domestic vehicle tyres with or without rims (max 4), petrol and engine oil (max 5 litres), 1 seat, 1 body panel resulting from work carried out by the householder on their own vehicle will be allowed. Other single components which do not contain hazardous materials will be considered on a case by case basis, contact Derbyshire County Council for further advice before taking to an HWRC.
Pallets	Maximum 1 pallet from a domestic household. Blue CHEP pallets will not be accepted
Fridges/freezers	Units from a domestic dwelling only, those brought directly from a commercial source will not be accepted

Pet waste, litter with faeces etc.	None accepted
Clinical infectious or offensive waste, syringes and needles etc.	None accepted
Hazardous household waste, garden and household chemicals, mercury etc.	Household chemicals only maximum 5 litres or 5kg in sealed containers with labels affixed so contents can be identified. Separate hazardous materials should not be mixed together in a single container
Allotment waste	None accepted
Canoes/kayaks	From a domestic household only, those belonging to a a club or association will not be accepted
Sunbeds	One accepted from a domestic household only
Fireworks, flares and other explosive items eg. WW2 munitions, firearms	None accepted
Fire extinguishers	From a domestic dwelling only, those of a commercial nature are not accepted. No halon gas type.
Gas bottles	Only bottles which do not have an identifying label on the side will be accepted. Oxyacetylene or other industrial type gas bottles not permitted. Gas bottles for medical use are also not accepted.