

PROPOSED CHANGES TO RECYCLING CENTRES: CONSULTATION REPORT

1. Executive summary

- 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 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.
- 1.2 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.
- 1.3 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.
- 1.4 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. Taken together, these sites currently receive approximately 85,000 tonnes of waste and recycles each year.
- 1.5 From 2 October 2023, Derbyshire County Council ran a 12 week public consultation on proposed changes to the Recycling Centres in Derbyshire. The consultation sought views on a number of cost-saving options, to enable the Council to reduce Derbyshire’s waste management costs.
- 1.6 The consultation was an opportunity for stakeholders in Derbyshire to provide feedback on some of the Councils proposals and to help form a strategic approach to managing the Recycling Centres. This includes whether to restrict or charge for tyres and asbestos; reduce opening days or times; as well as whether businesses should be able to use the Recycling Centres and if so how. Businesses were also invited to complete specific sections within the survey, to gain a better insight into their waste management habits and whether a small charge would affect their use of the Recycling Centres.
- 1.7 Summary of key points:
 - The consultation received 2876 responses, 83% from people aged over 45.
 - 75% of residents agreed that Recycling Centres should be for the sole use of Derbyshire County Council residents only.

- However, 83% of residents, and 80% of businesses, agreed that businesses should be able to use Recycling Centres for a charge.
- 70% of residents agreed with the government's definition of DIY waste that would allow a limited amount of household construction waste to be disposed of for free. However, many felt that the limits were too small and would require more trips, with a negative impact on the environment from the increased car trips.
- Two thirds of respondents (66%) would like to see Recycling Centres continue to accept tyres without any charge, but 90% agreed that small charges would be preferable to not accepting them.
- Similarly, 69% of respondents would like to see Recycling Centres continue to accept asbestos without any charge, but 94% agreed a charge would be preferable to not accepting it.
- Weekends accounted for 44% of resident's trips made to Recycling Centres, whilst mornings (59%) were narrowly preferred to afternoons (41%). However, opinion was split on whether Recycling Centres should be open from 09:30 – 17:00 or 10:30 – 18:00, with both options receiving 38% of responses.
- 78% said they would prefer to reduce opening hours and keep the centres open seven days a week, rather than maintain the hours over five days.
- 85% of respondents said they would not have any problems registering online, however, there were a number of comments requesting alternative options to help reduce digital exclusion, whilst many also sought further clarification on how any registration system would work.
- 84% of businesses surveyed employed 10 people or fewer, whilst 95% of all businesses said they would use Recycling Centres if they were available.
- The most common materials businesses would bring are garden waste, cardboard, paper, and general unsorted waste.
- Throughout the survey the issue of fly-tipping was highlighted, with residents and businesses highly concerned that any changes would increase this problem.

2. How we consulted on the proposed changes?

2.1 Online survey

2.1.1 The online survey was available on the Derbyshire County Council Consultations web page and was live from Monday 2 October 2023 until Sunday 24 December 2023. The survey received 2,876 responses. Two versions of the survey were available, one for residents or visitors to Derbyshire, and one for those representing a business in Derbyshire. The overwhelming majority of responses were from residents (98%), then businesses (1.5%), with a small number also completed by visitors (0.5%).

2.1.2 The profile of respondents across the whole online survey are shown below:

- 49% male and 47% female
- Primarily over 45, with 40% aged 45 - 64 and 43% over 65 years old – Figure 1 outlines the full age profile of respondents.
- 12% recorded themselves as having a disability

Age	Under 25	25-44	45-64	Over 65	Prefer not to say
%age	0.3%	13.2%	39.6%	42.6%	4%

Figure 1: Age profile of all survey respondents

2.2 Community surveys

2.2.1 In addition to the online survey the Council ensured that paper copies of the Consultation were available at all Derbyshire libraries, throughout the duration of the online survey, to try and increase participation and ensure inclusivity for stakeholders. Paper copies could either be returned to the library or posted back via a freepost address. Paper surveys could also be requested directly from Derbyshire County Council.

2.2.2 A total of 119 paper surveys (4.1%) were received and were manually entered on to the online survey, with the data combined to produce the findings in this report.

2.3 Direct emails and social media comments

2.3.1 A number of direct emails were received regarding the consultation, along with comments made through social media. These have been captured in section 4.

3. What we asked?

3.1 Residents and visitors

3.1.1 Where and how often do residents visit a Derbyshire County Council Recycling Centre?

- Most respondents visit a Recycling Centre once every three months (33%) or once every month (29%). Around 17% of respondents visit every six months, while about 8% visit every fortnight. Approximately 4% of respondents attend once a week and a similar number come once a year.
- There was a good response from users of all nine Recycling Centres across Derbyshire (see figure 2), but the most well represented were Northwood/Darley Dale (21%), Ilkeston (18%), and Stonegravels/Chesterfield (14%). There were fewest responses from users of Glossop (3%), Bretby (5%), and Ashbourne (7%).

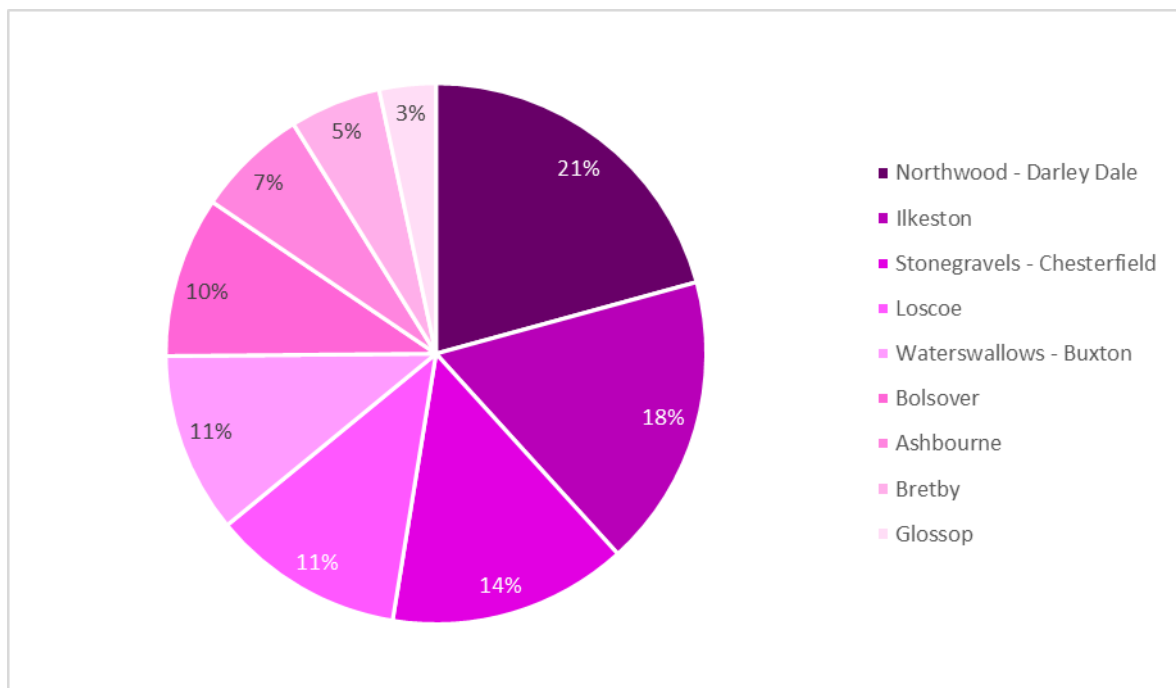


Figure 2: Recycling centre used most frequently by respondents.

3.1.2 Which materials are most commonly brought to the Recycling Centres?

- Figure 3 shows the top 20 most frequently brought materials. The most frequent is small domestic appliances (7.3%), while cardboard (7%), wood (6.7%), hard plastic (6.3%), reconstituted wood (6.2%), garden waste (6.2%), and household landfill/residual waste (5.9%) were all regularly disposed of at the Recycling Centres.

- The least commonly brought items from the list were medical mobility equipment (0.2%), asbestos (0.2%), gas cylinders (0.3%), vegetable oil (0.5%), and tyres (0.6%).

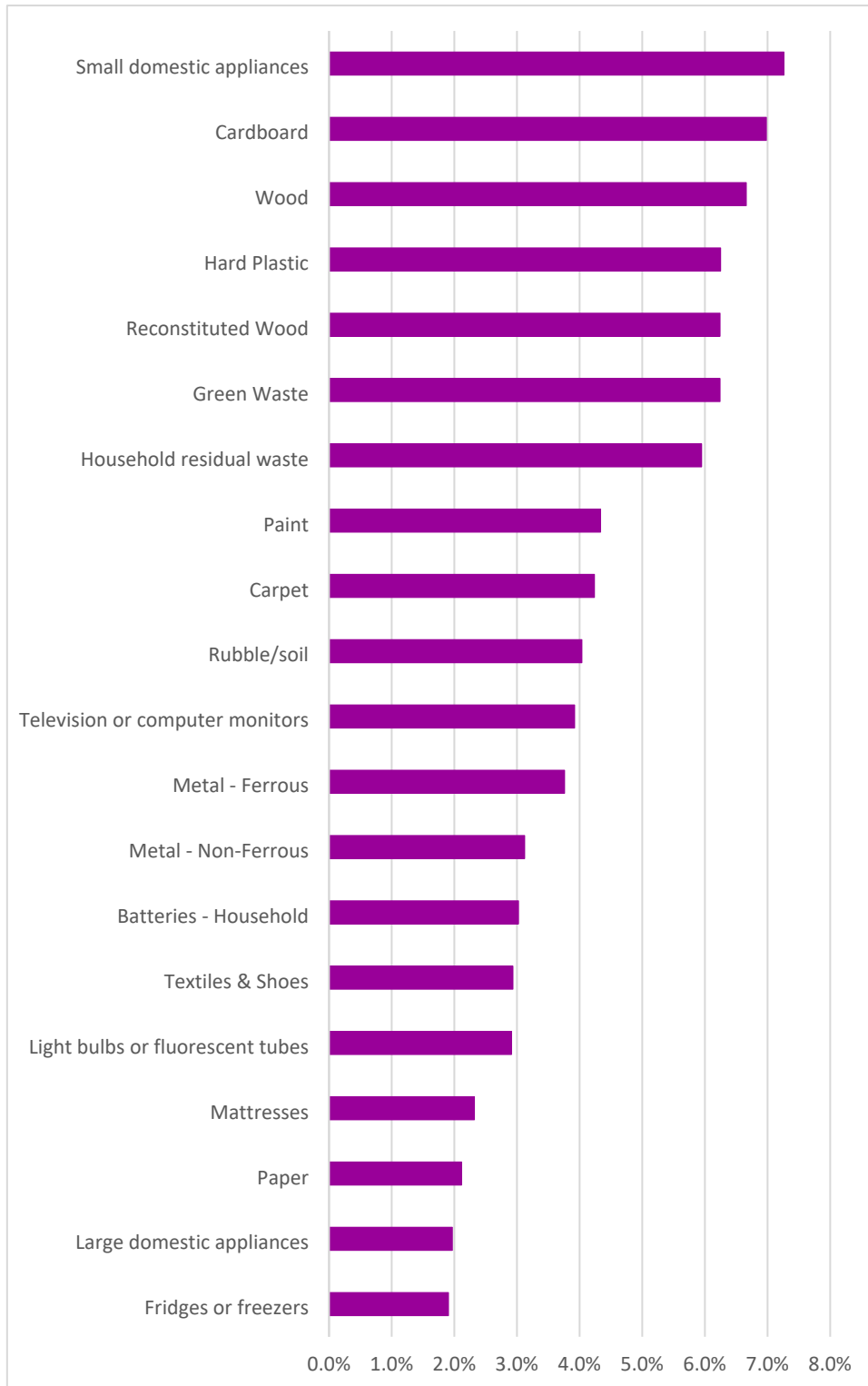


Figure 3: Top 20 most common materials brought to Recycling Centres

3.1.3 Should Recycling Centres be provided for the sole use of Derbyshire County Council residents?

- Respondents were strongly of the opinion that Derbyshire County Council's Recycling Centres should be for the sole use of Derbyshire residents, with 75% of respondents agreeing and only 11% disagreeing (see figure 4).

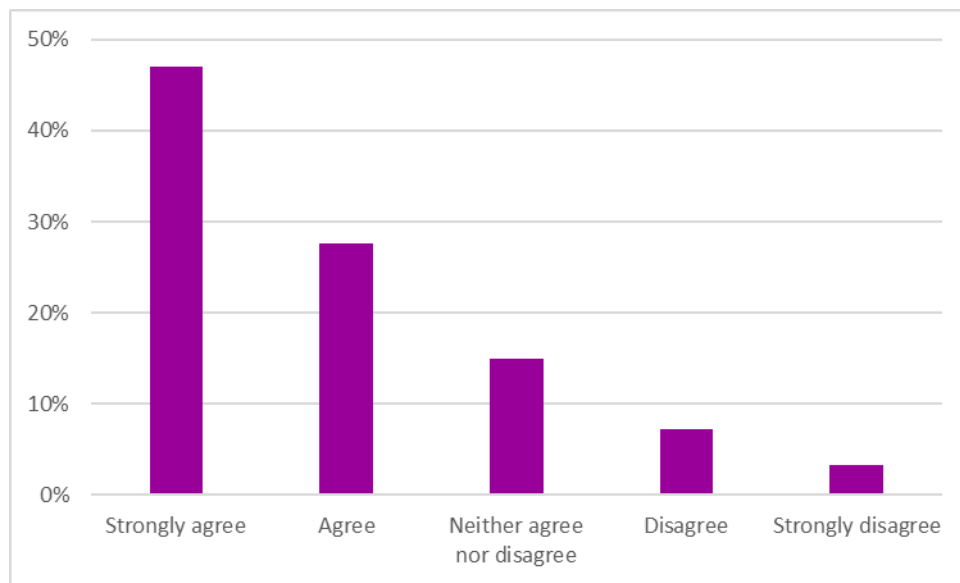


Figure 4: Recycling centres should be for Derbyshire residents only?

3.1.4 Adopting the government definition of DIY waste?

- The survey wanted to understand if the government's proposed definition of DIY waste would be suitable for Derbyshire residents. This definition provides allowances for construction waste if it meets certain criteria.
- Those criteria are:
 - The waste is produced by householders whilst carrying out small-scale construction or demolition works at their home.
 - The waste does not arise from activities that generate an income for the person who carried them out.
 - The waste is not produced on a regular basis requiring more than four visits per household over a 4-week period.
 - The permissible quantity of waste per visit will be restricted 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) per visit.

- An example list of the type of construction materials included in the definition was also provided.
- A significant majority of residents agreed with Derbyshire County Council adopting the government’s definition of DIY waste and the corresponding limits (70%), while only 15% disagreed (see figure 5).

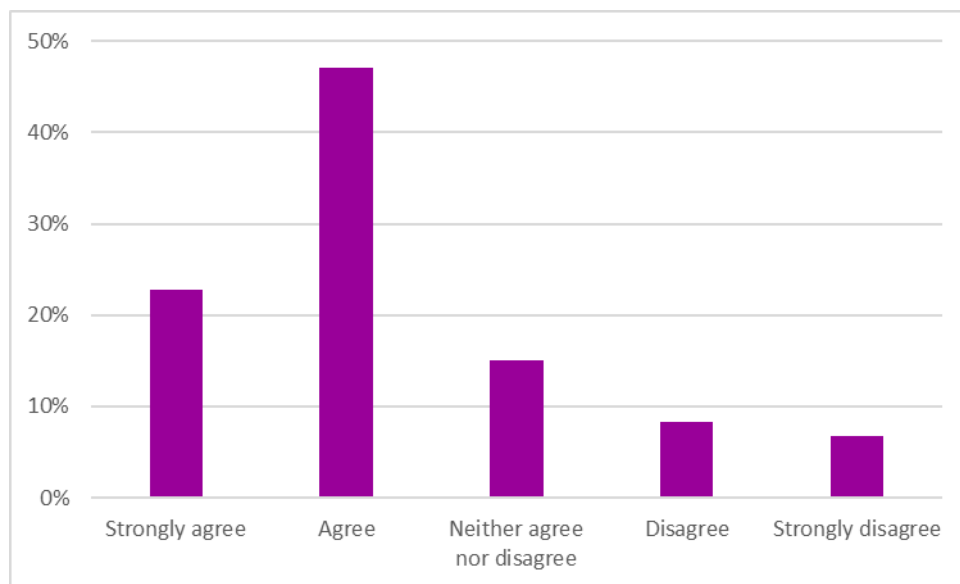


Figure 5: Derbyshire should adopt the government’s definition of DIY waste?

- Comments provided alongside this question focussed on concerns that any restrictions may result in an increase in fly-tipping and the costs associated with addressing that (25%):

“Where else would you take it if the sites did not take it? A lot of people would just fly tip which would cost more money and time to clean up”.

“I have already been a victim of fly-tipping. I think any fear that a charge will be imposed will lead to an increase in illegal waste disposal by householders”.

- The next most prevalent comments related to the amount of waste allowed under this definition, with many suggesting that the average DIY project would generate much more than two 50 litre rubble bags (23.2%) and would require more than one trip a week (6%):

“Most household jobs produce more waste than two 50 litre bags and if it does are we required to pay for the disposal”?

“The DIY waste proposal doesn't make sense for those living rurally who may make less frequent but larger deposits of waste”.

- Many respondents suggested that limits to visits should be spread out over a longer period, such as a year, so that a higher frequency of visits could be made during the period of a DIY project and then fewer made during the rest of the year (2.2%):

“On occasions when someone is completing a DIY project, they may produce a significant amount of waste in a short period of time and then not visit the Recycling Centre again all year”.

“When you are doing a DIY project you may need to visit more than four times in a particular month but then not visit for several months, so over a 12-month period may not visit as many times as someone visiting four times every month”.

- Other respondents were concerned that the size restriction would increase the frequency of trips needed and therefore increase the environmental impact through an increase in car journeys (5.1%):

“I have no problem with the first three definitions but feel that the permissible quantity should be greater than two 50 litre sacks as this will cause more trips to the refuse centre so will have a negative impact on the environment due to more car journeys”.

“More trips to the tip to take items means more carbon footprint”.

3.1.5 Should the council continue to accept tyres and asbestos at Recycling Centres?

- The consultation outlined that there is no duty for local authorities to accept certain types of waste, including tyres and asbestos, but Derbyshire County Council currently does accept a limited amount of this waste free of charge.
- The consultation sought views on whether this service should continue, despite it costing the council, on average, £4 per tyre and £6 per sheet of asbestos to dispose of, and if so, should a charge be introduced to cover the cost?
- Figure 6 shows that for both items roughly two thirds of respondents wanted the council to continue to accept these items without charge as is currently the case.

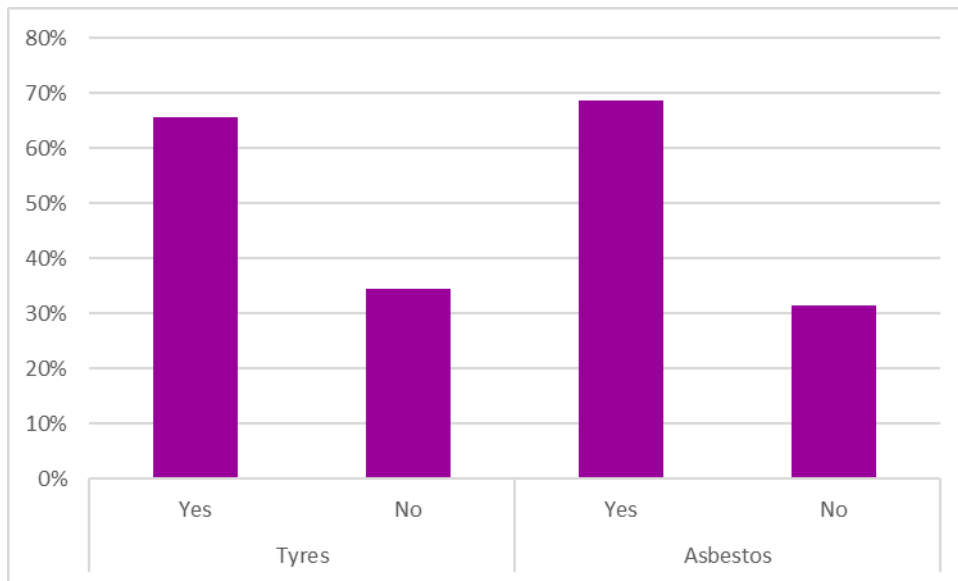


Figure 6: Should Recycling Centres continue to accept tyres and asbestos?

- When asked to choose between the service continuing for a small charge or stopping entirely an overwhelming majority (92%) would prefer a charge to be introduced rather than these materials not being accepted (see figure 7).

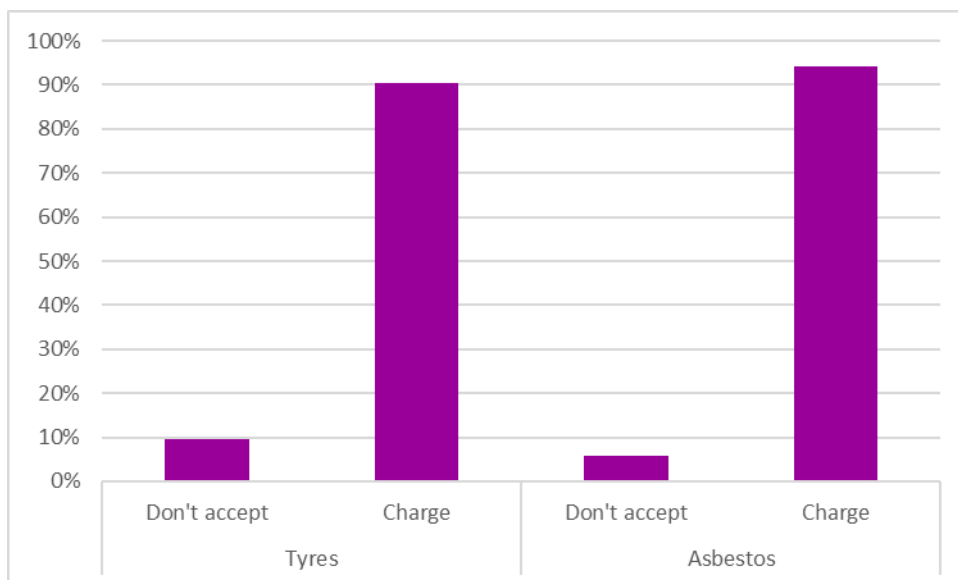


Figure 7: Should charges be applied rather than tyres and asbestos not being accepted?

- Space was provided for comments on this proposal and the top 10 topics that were discussed in relation to tyres and asbestos are shown in figure 8.

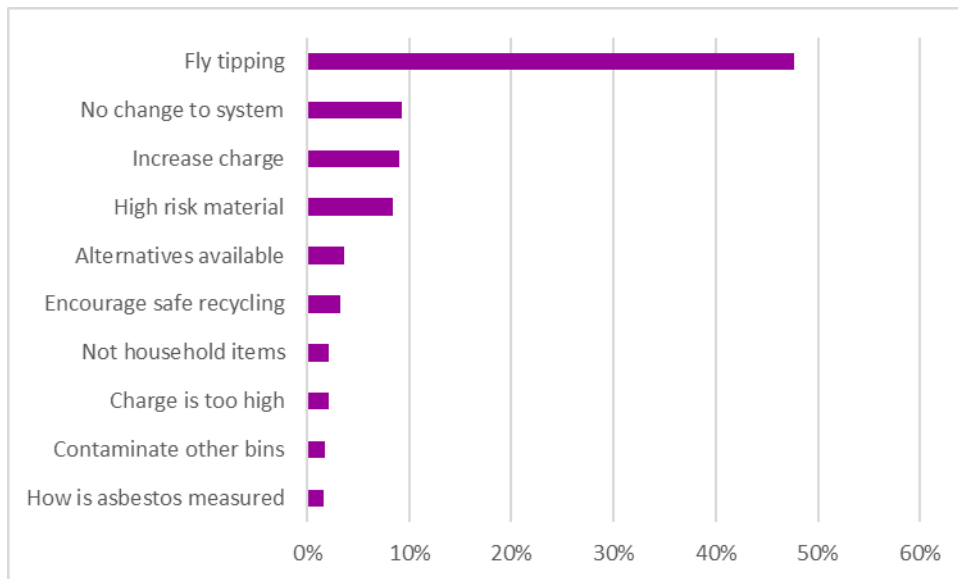


Figure 8: Top 10 comment categories about tyre and asbestos disposal

- For respondents who did not want the council to continue to accept these items, the high cost to the taxpayer; the risk of dealing with a hazardous material like asbestos; and the fact that they do not consider these to be reasonable household materials, were mentioned:

“Tyres should be disposed of by the new tyre supplier and asbestos material by a qualified/specialist company, not at the expense of the taxpayer”.

“Why should Derbyshire Recycling Centre employees/other service users be put at risk of harm due to inhalation of asbestos incorrectly wrapped for disposal”?

“These items are not general recyclable items and as such should not be managed through the domestic operation funded by taxpayers”.

- Respondents who wanted to keep accepting these items but would prefer a charge rather than them not being accepting highlighted that, the charge was acceptable or should be higher to ensure that there is no additional cost to taxpayers in the county; alternative options are already available for the disposal of tyres; and that the council should provide a convenient place for these items and encourage responsible recycling:

“Personally, I would not use the Recycling Centre for either tyres or asbestos, but if I did I would expect to pay”.

“Old tyres have always been accepted when buying new ones. Asbestos should be commercially taken care of as part of the removal process”.

“Everything should be easy and free/affordable to encourage more recycling”.

- The majority of respondents did not want the current system for tyres and asbestos to change and for them to continue to be accepted free of charge. Similar to the comments made about adopting the government’s definition on DIY waste, the main concern was that any restrictions or charges would increase fly-tipping and that asbestos posed a particularly worrying environmental impact and cost to clean up:

“Residents of Derbyshire should be able to dispose of this waste from their homes free of charge”.

“My worry is that if you don’t accept tyres/asbestos at all, then some people won’t bother with the inconvenience of finding a proper place to dispose of them and will just dump them in the countryside”.

“If you charge or refuse to dispose of asbestos then people will just dump it causing real environmental issues”.

3.1.6 What are the most popular days and times for visits to Recycling Centres?

- Currently, the weekend is the most popular time for residents to visit the Recycling Centres (see figure 9), with Saturday and Sunday receiving almost double the responses of the weekdays (22% on average each day). Monday to Thursday was roughly equal in responses (12% on average each day) but Friday was noticeably lower than any other day (8%).

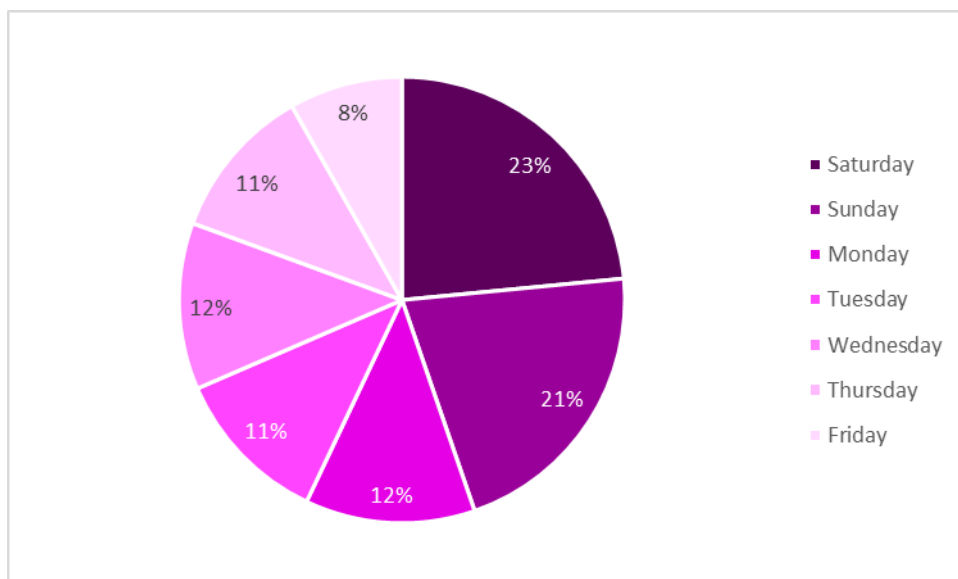


Figure 9: Most popular day of visits to Recycling Centres

- The morning is a slightly more popular time to visit the Recycling Centres with 59% preferring to come before 1pm and 41% after (see figure 10).

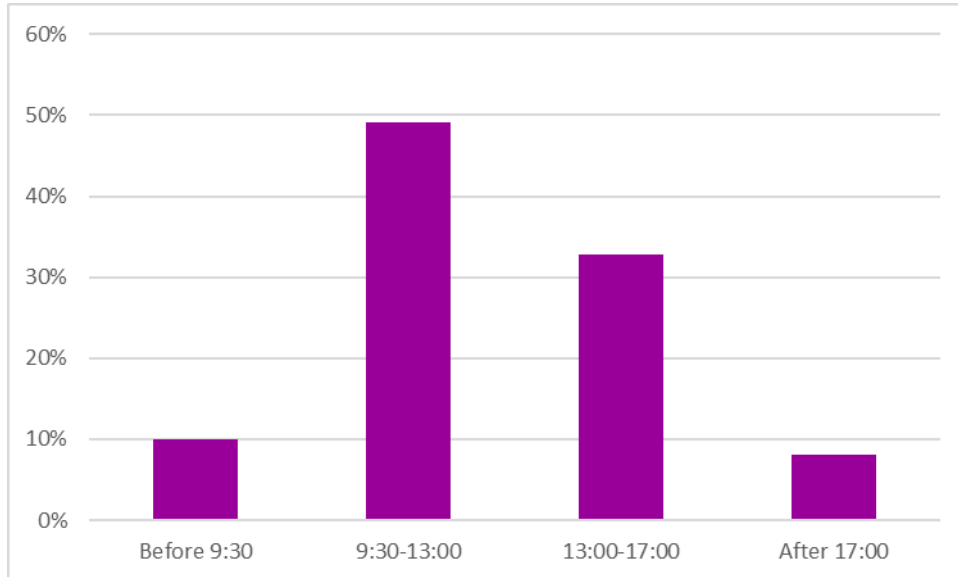


Figure 10: Most popular time of visits to Recycling Centres

3.1.7 If the opening times have to be reduced, what would be the preferred options?

- Respondents were asked whether they would prefer opening times to be reduced by two hours per day and still open seven days a week, or to reduce the number of days that they are open to five but with the existing hours maintained. Figure 11 shows that 78% of respondents would prefer to reduce the hours, compared to only 22% that would prefer to reduce the days.

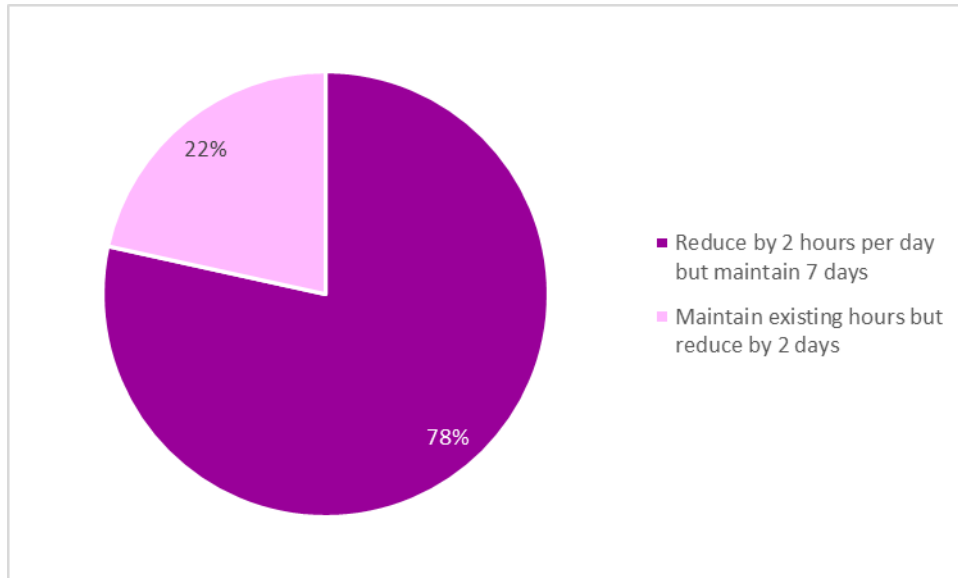


Figure 11: Preference to reduce daily hours or days per week

- The survey then asked which would be the preferred opening times if they had to be reduced by two hours each day (see figure 12). There was very little difference between the options of 09.30 – 17.00 (37.7%) or 10.30 – 18.00 (37.8%), but 8.30 – 16.00 (24.5%) got a much lower share of the responses.

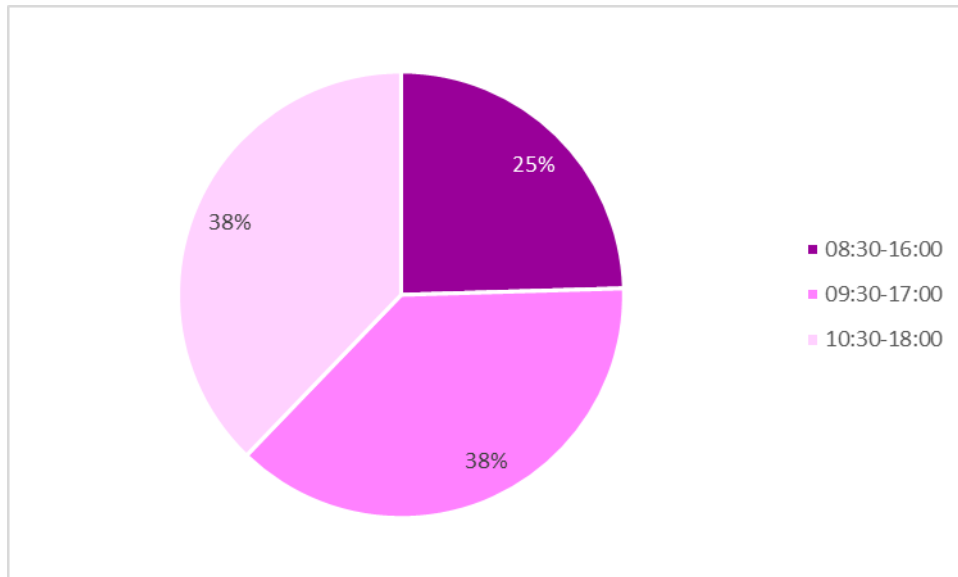


Figure 12: Preferred opening times for possible reduced hours

- If the number of days was reduced to five instead, respondents were asked which five days they would prefer the Recycling Centres to be open (see figure 13). Wed – Sun (33%) or Thurs – Mon (22%) were the most popular choices, with Sun – Thurs (3%) by far the lowest preference.

- Some respondents asked why the Recycling Centres had to be open on five continuous days and would have liked the option to pick the five most popular days instead.

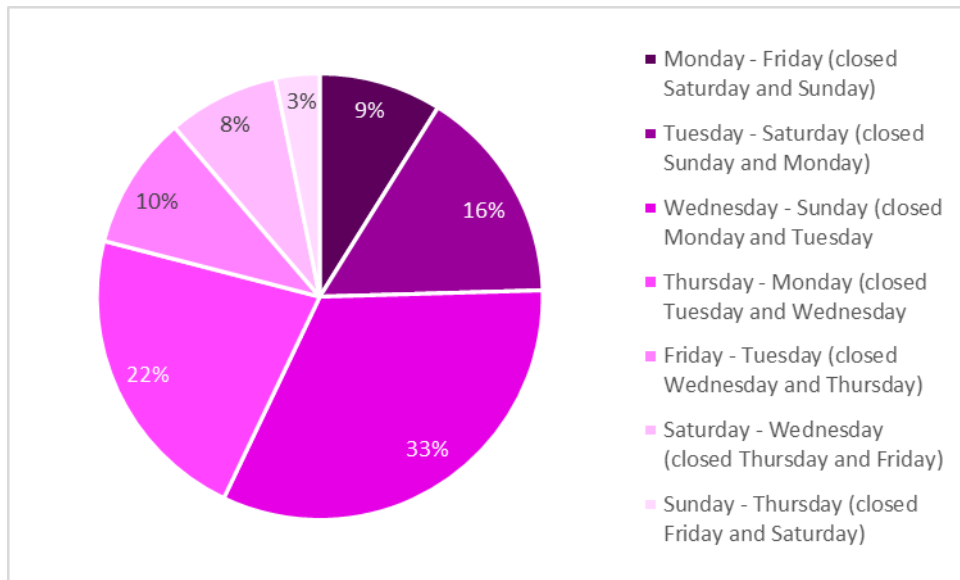


Figure 13: Preferred weekly opening for possible reduced days

- Finally, respondents were asked if they would prefer to have the same 7.5 hours per day all year round, or whether opening should be seasonal, with an extended 8.5 hours between April and September and a reduced 6.5 hours from October to March. Figure 14 shows that responses were roughly even on this question, with a slight preference to maintain 7.5 hours all year.

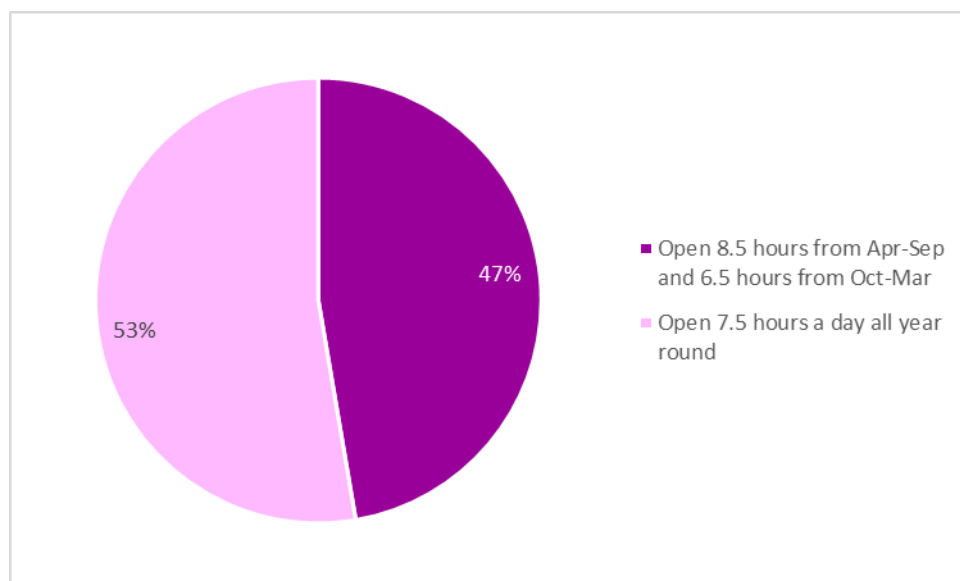


Figure 14: Should opening hours change with daylight savings?

3.1.8 Small businesses and traders should be able to use the Recycling Centres for a charge?

- Residents were asked about trade use of the Recycling Centres with a significant majority agreeing (83%) that businesses should be able to use Recycling Centres for a charge (see figure 15).

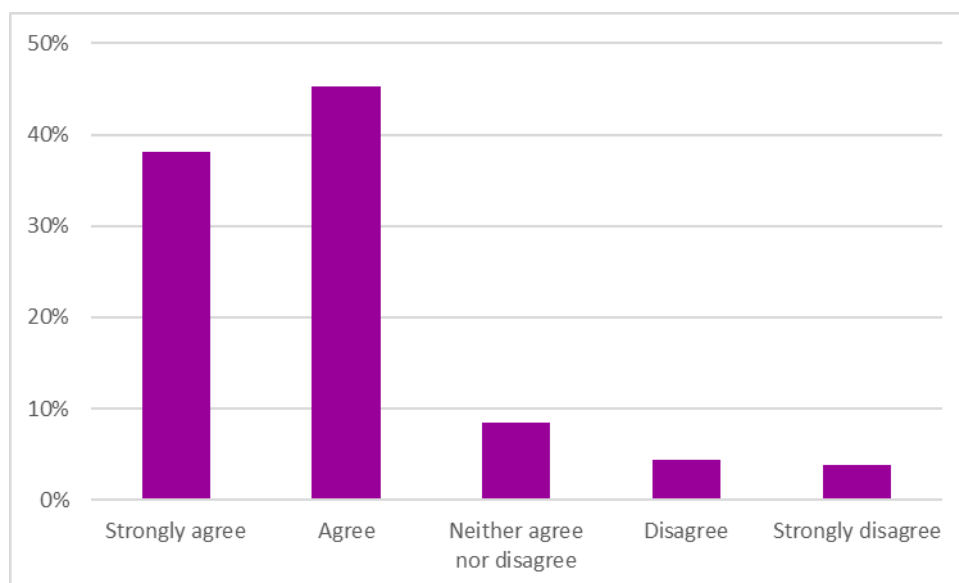


Figure 15: Businesses should be allowed to use Recycling Centres for a charge?

- As with previous questions, the focus of the comments provided was on the potential for restrictions and charges to increase fly-tipping (see figure 16):

“It will encourage fly-tipping and increase the council costs”.

- The same percentage of respondent’s comments were on either side of the debate as to whether businesses should have to pay a fee or not. 13% of comments highlighted the difficulty that businesses face and that the council should be trying to support small businesses wherever possible, whilst the same percentage don’t think that the council should bear the costs of trade waste and that businesses should add waste costs to the prices they charge for their services:

“They should be allowed to use the centres free of charge. A way DCC can support small businesses”.

“Businesses small and large are profit making and should take into account all costs in their business plans and dispose of their waste professionally”.

- Similarly, the percentage of people who commented that the rates businesses pay should entitle them to use the Recycling Centres for free (9.9%) was matched by a similar percentage that felt that no trade waste should be accepted, and the Recycling Centres should be solely for household waste (9.6%):

“Would rather they are able to visit without charge - if they are Derbyshire companies then they are already paying business rates to the county”.

“It is for household waste not business waste”.

- Other comments suggested using a licence or permitting system, rather than a charge per visit for businesses, whilst others were concerned about the impact on how busy and congested the sites could get if accommodating more trade waste. Some respondents also suggested having a separate facility for trade waste:

“Issue permits like Worcester - or limit visits - we see small traders with regular trips to the site - at what point are they no longer a small trader but profiting from a free service”?

“They will have more rubbish that will take longer to off load. Queues will become longer at busy times”.

“They should have their own centre and be charged”.

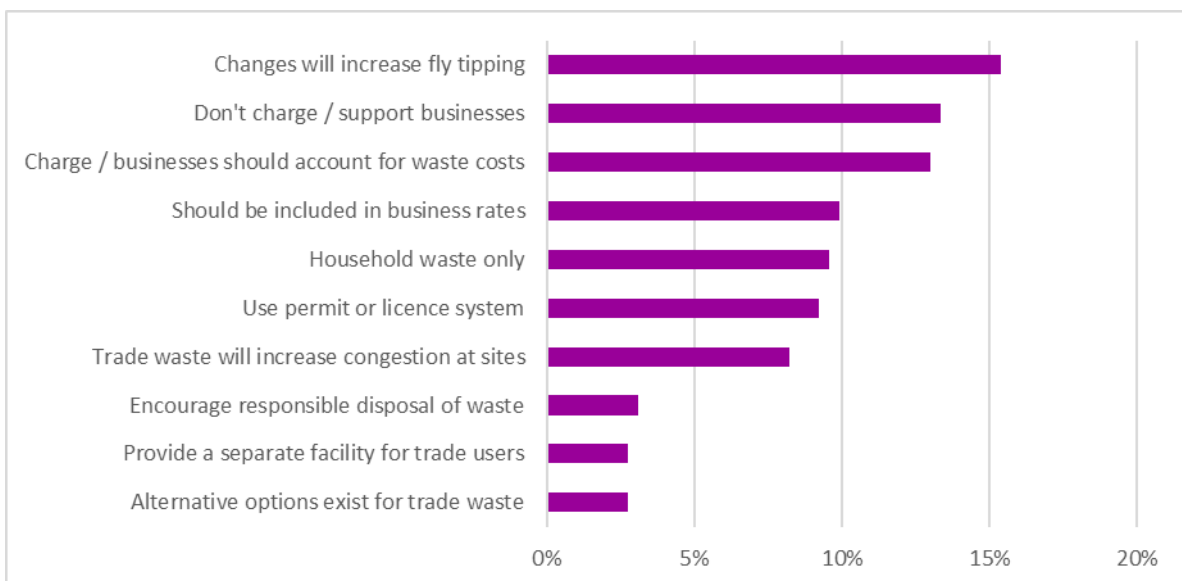


Figure 16: Top 10 comment categories on accepting trade waste for a charge

3.1.9 Registering vehicle details online to better manage use of Recycling Centres?

- To help manage the use of Recycling Centres, it was proposed that automatic number plate recognition could be used to help ensure that only registered residents of Derbyshire were accessing Derbyshire County Council centres. This would require vehicle details to be registered and respondents were asked if registering their details online would cause any problems.
- Figure 17 shows that a clear majority do not have an issue with registering online (85%).

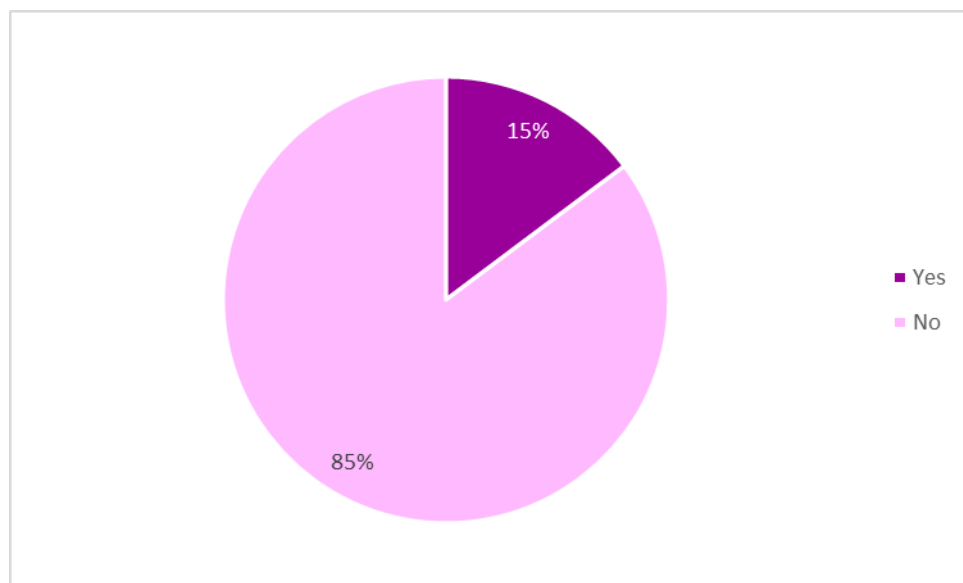


Figure 17: Would you have any problems registering your vehicle online?

- From the comments received (see figure 18), the majority of concerns are based on the opinion that there is no need to change the current system (39%). The next major concern was for those who used multiple vehicles, or who used the vehicles of friends or family outside Derbyshire (10%) and whether they would be able to register these vehicles as needed; whilst a number of comments raised concerns about data protection and privacy (6%):

"I wouldn't like to register my vehicle at all as I don't agree to this idea that only Derbyshire County Council residents can use Derbyshire County Council Recycling Centres".

"I have multiple cars so can I register more than one"?

"I don't have a car, I ask my friends to help when I have things and so I would [need to be able to] register their car".

“Concern - registering of vehicles must not be used for purposes other than checking eligibility for accessing sites, under any existing or future circumstances”.

- Alternatives were suggested to vehicle registration, including bringing a utility bill or ID when visiting a Recycling Centre (7%), registering by phone or text message (6%), or registering by post or with a paper form at a council office or library (6%).
- The need for alternatives to online registering underlined the explicit topic of digital exclusion and the lack of access that many people in Derbyshire have to the internet, which was highlighted in 3.3% of the comments made:

“Personally, I could register online, but people who cannot may well not see this survey”!

“You, like everyone else, assume ‘online’ is easy - for a great many elderly it is not. I am so fed up with the assumption we all have internet access or a smart phone”.

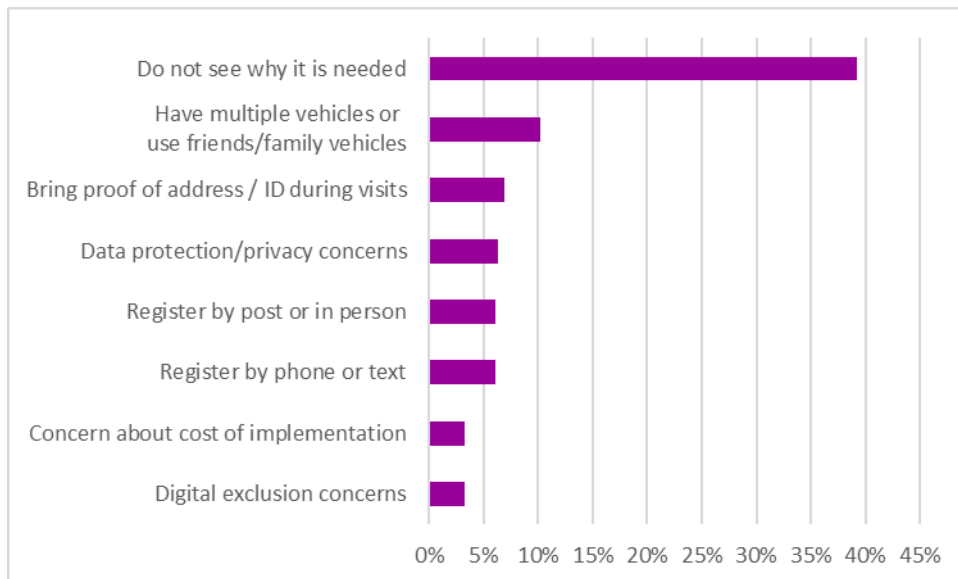


Figure 18: Top 8 comment categories in relation to registering vehicle details online

3.2 Businesses

3.2.1 Business types and sizes surveyed?

- Figure 19 shows the sectors that business respondents were in, with the largest representation coming from the building, glazing and gardening sector (27.5%) followed by professional and service sectors (22.5%).

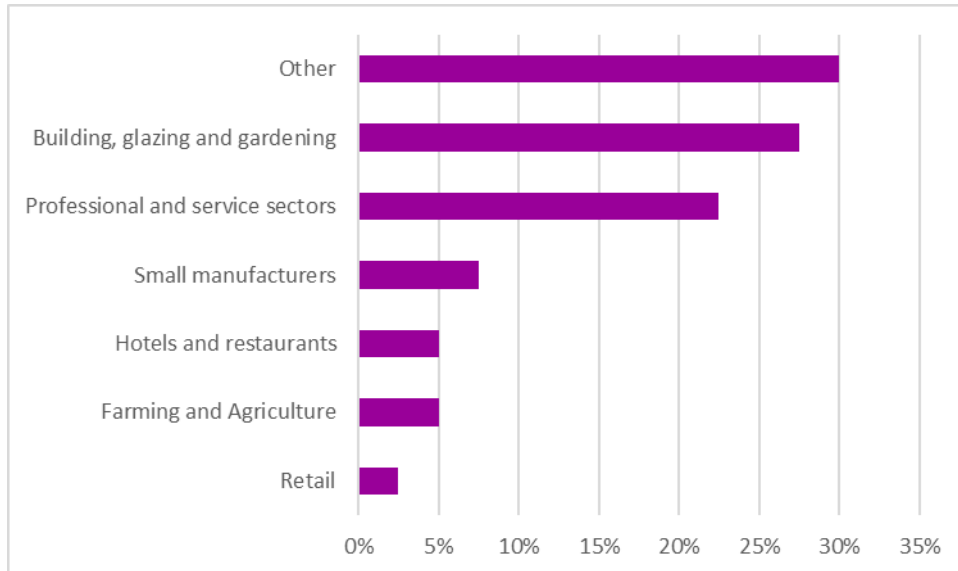


Figure 19: Business sector of respondents

- Figure 20 shows the size of businesses surveyed, based on employees. Almost all (84%) of those surveyed were small businesses with fewer than 10 employees.

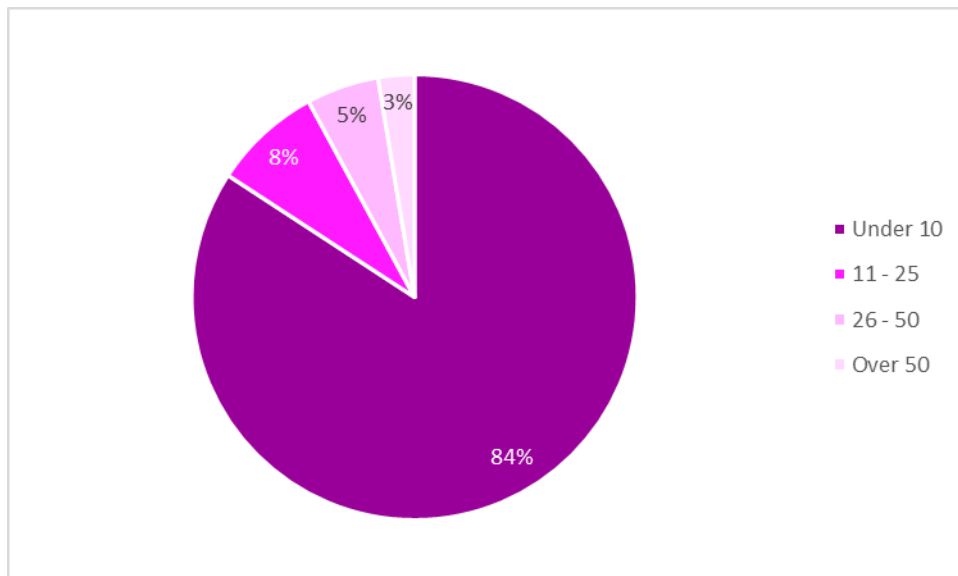


Figure 20: Size of businesses surveyed, by number of employees

3.2.2 Small businesses and traders should be able to use the Recycling Centres for a charge?

- Businesses were also asked the same question as residents (see section 3.1.8) as to whether they should be allowed to use Recycling Centres for a charge.

- Figure 21 shows that businesses responded very similarly to residents with only slightly fewer (80% compared to 83% of residents) in favour of allowing trade waste for a charge.

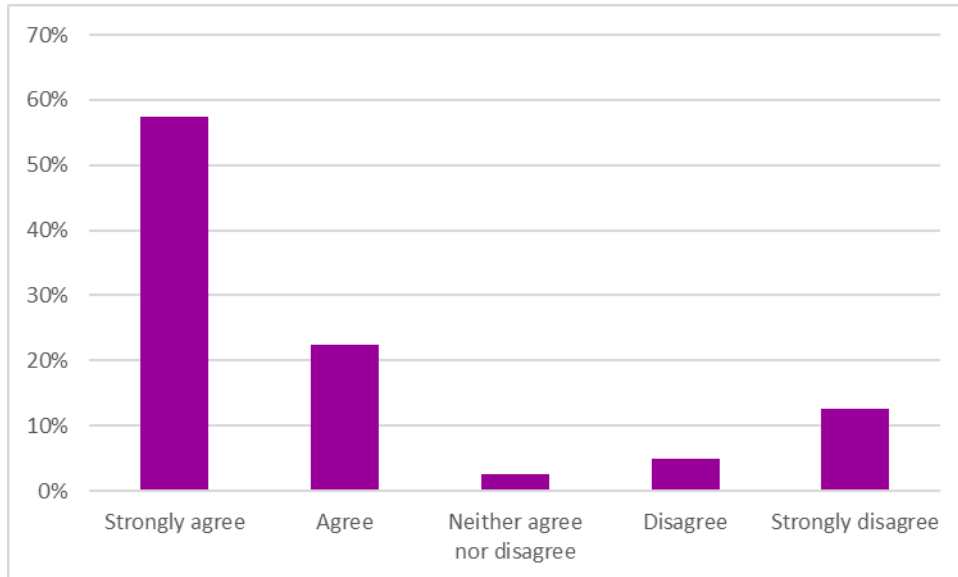


Figure 21: *Businesses should be allowed to use Recycling Centres for a charge?*

3.2.3 Would businesses use Recycling Centres if available and which would they want to use?

- 95% of businesses said they would consider using Recycling Centres if this option was available to them (see figure 22).

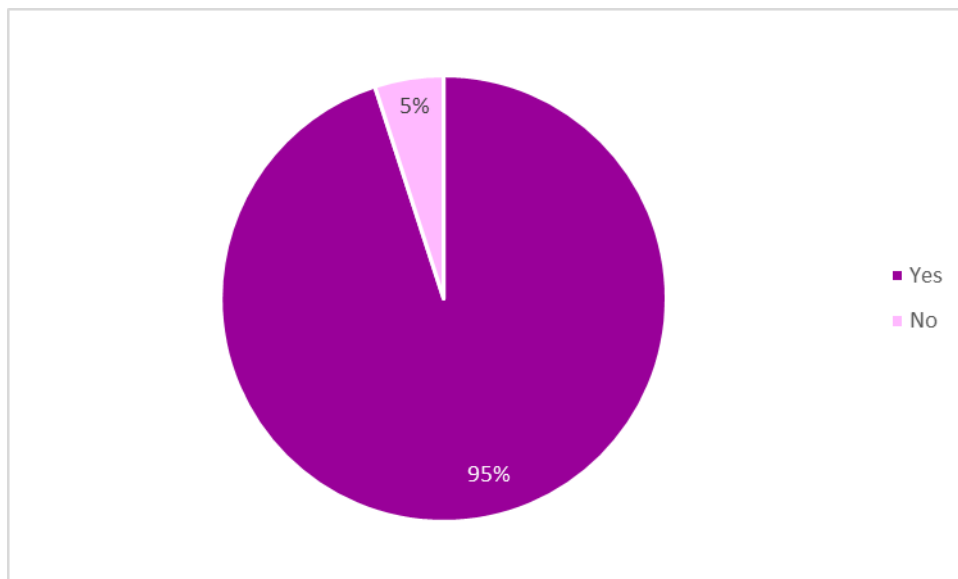


Figure 22: *Would businesses consider using Recycling Centres if available?*

- Of those businesses interested in using Recycling Centres, Ilkeston, Loscoe, or Northwood (Darley Dale) were the most popular sites,

registering over 15% each. Bretby and Ashbourne were selected by 5% or fewer respondents, while no businesses responded that they would want to use Glossop (see figure 23).

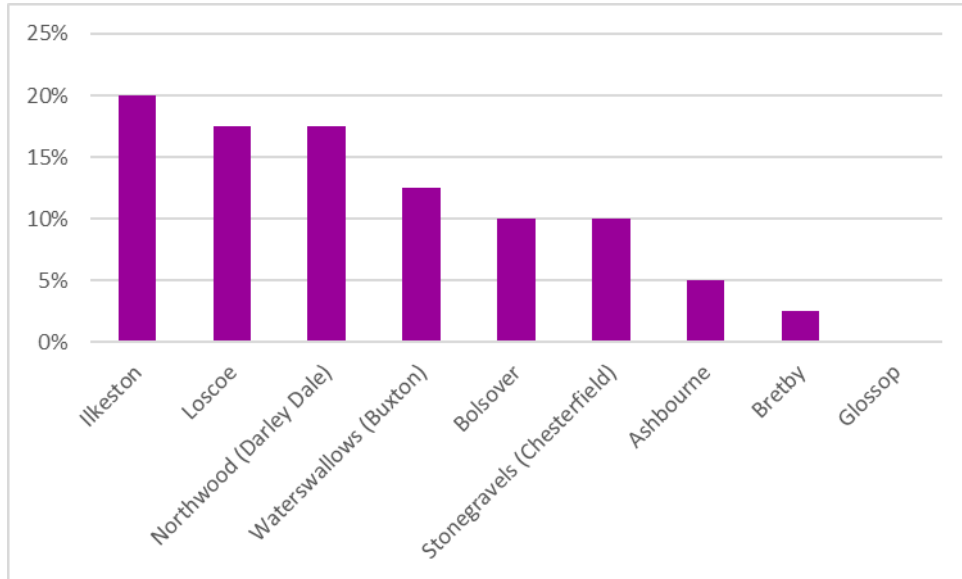


Figure 23: Which Recycling Centres would businesses want to use?

3.2.4 How much recyclable waste are small businesses generating each week?

- Businesses were asked how much of each type of recyclable waste they generate in a typical week, with a list of 18 common materials provided along with six different size options.
- Figure 24 shows the most common waste materials generated by businesses each week, with businesses asked to estimate the number of units they would produce for each item, from the smallest (bin bag) to the largest (more than a large van or large skip). Garden waste was the material produced in the highest volume, representing over 13% of all the materials estimated.

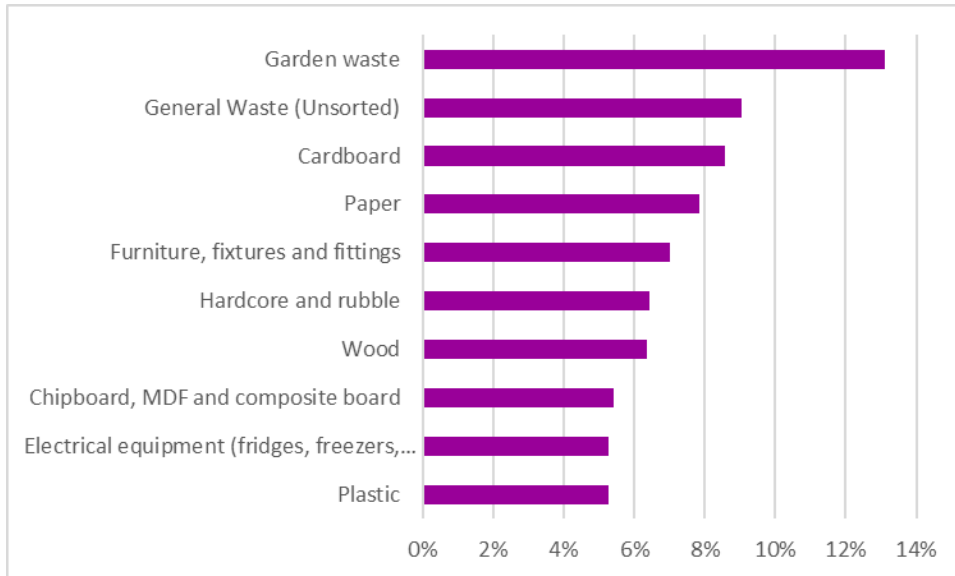


Figure 24: Waste generated by businesses each week

- The survey also asked what type of vehicle businesses would likely use to bring waste to a Recycling Centre, with the majority choosing to use a car (39%) or transit van (26%) – see figure 25.

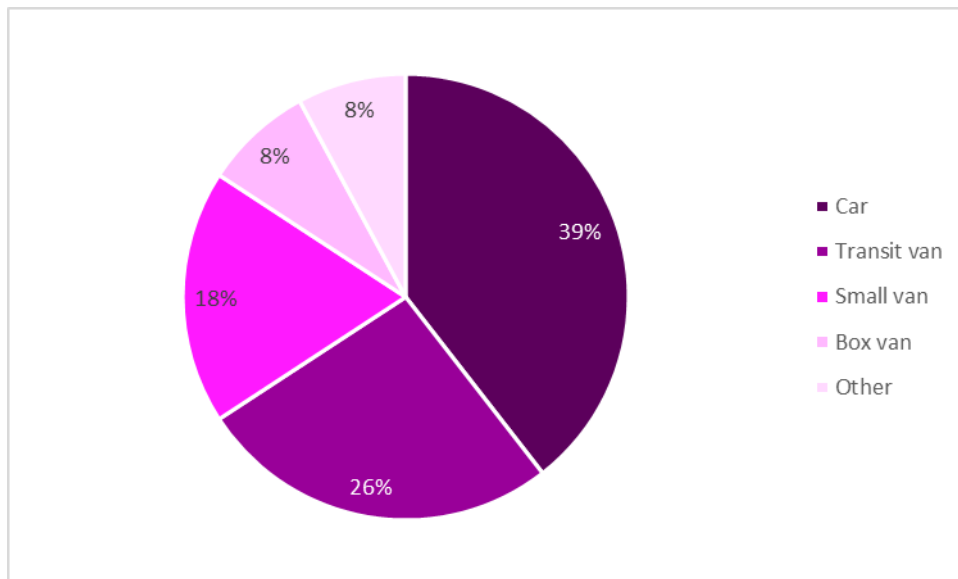


Figure 25: What sized vehicle would businesses use to bring waste?

3.2.5 What days and times are businesses likely to use Recycling Centres?

- There was only a small variation between the days that businesses would prefer to visit Recycling Centres, with Friday (16.8%) marginally the most popular day and Thursday (11.7%) the least popular day (see figure 26).

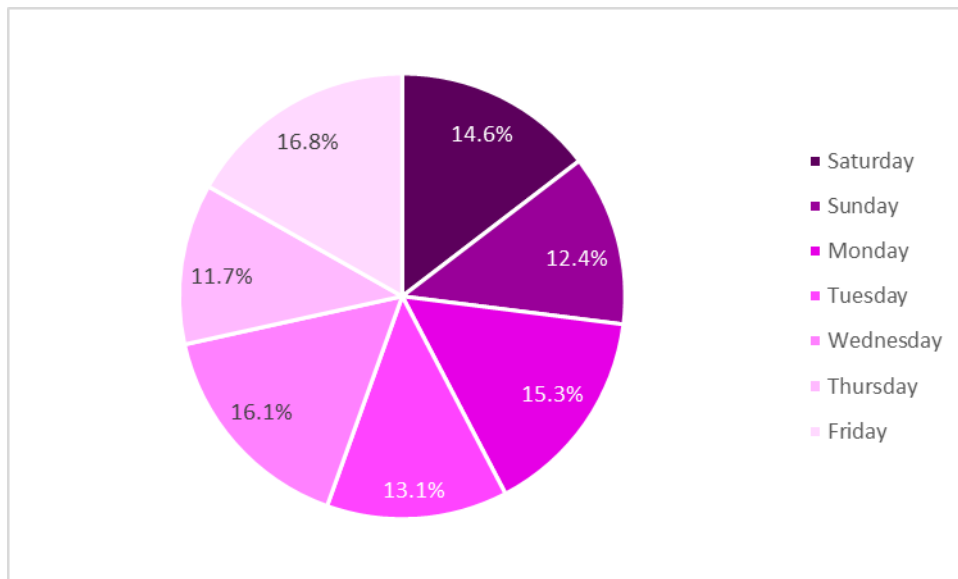


Figure 26: Preferred days that businesses would use Recycling Centres

- Afternoons (47%) were the most popular time that businesses would prefer to use Recycling Centres, with mornings, from 09:00 – 12:00 (24%), only slightly more popular than evenings, 17:00 – 20:00 (21%). Early mornings, 06:00 – 09:00, were the least popular (8%).

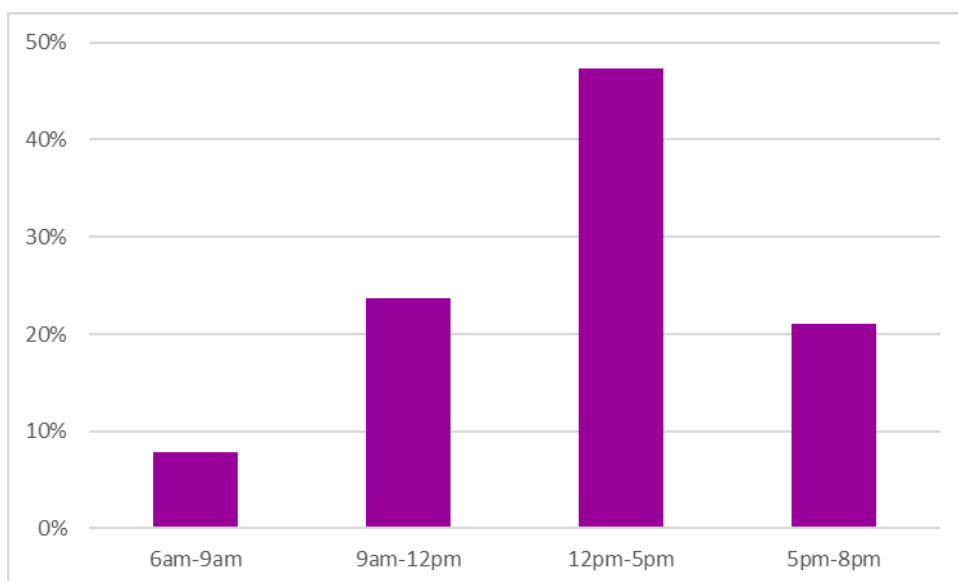


Figure 27: Preferred times that businesses would use Recycling Centres

3.2.6 Reasons why businesses would like to use the Recycling Centres?

- Businesses were asked what the main reasons are for why they would like to be able to use Recycling Centres. The most popular answer was due to the convenience (21.5%), with the location (18.5%) and affordability (18.5%) being the next most common responses (see figure 28).



Figure 28: Reasons why businesses would like to use Recycling Centres

- Business respondents were also asked if they had any other comments about the proposed changes to Recycling Centres. There were only a small number of comments provided, with many suggesting that the use of Recycling Centres should be free due to paying business rates (20.8%), or that any changes will increase fly-tipping (16.7%) – see figure 29:

“Recycling is so vital to the safety of our planet and our communities. We pay our taxes to cover the cost”.

“Great service which is cost effective. If this service is reduced or closed then there could easily be an increase in fly-tipping”.

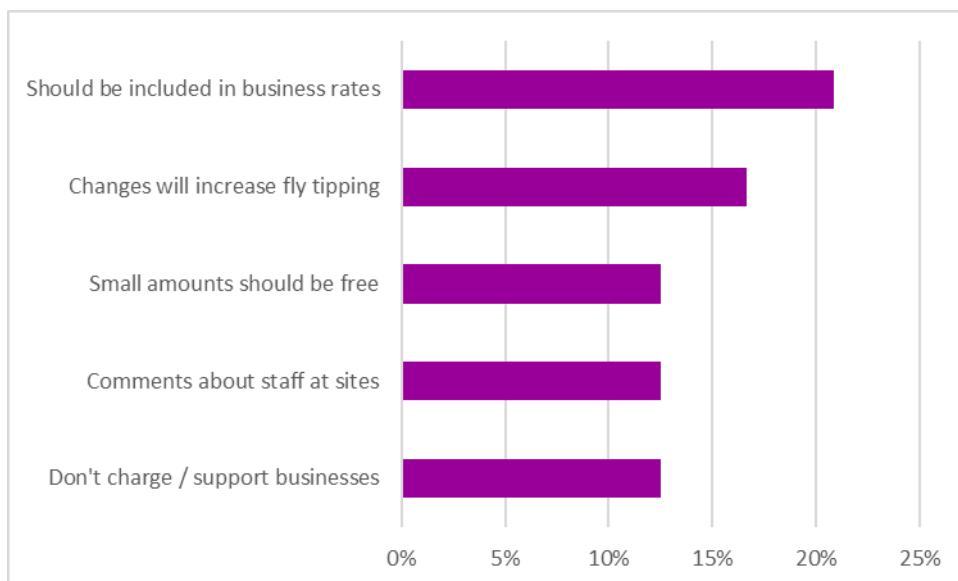


Figure 29: Top comment categories made by businesses

4. Themes raised and important issues

4.1.1 From the survey analysis, the comments made, and the direct emails provided, there are a number of important themes emerging.

4.2 Fly-tipping: perceived increase in prevalence and costs to clean up

4.2.1 Throughout the survey it was clear that a significant proportion of residents are very concerned that any restrictions - whether it is changes to opening days and times; changes to what waste will be accepted; if charges are introduced for businesses or certain materials; or if access requires registration – will lead to an increase in fly-tipping.

4.2.2 Residents are particularly concerned, with some highlighting existing issues with fly-tipping that they expect to be exacerbated by any changes. Many people suggested that the costs of dealing with the anticipated increase in fly-tipping would outweigh any cost savings made from changes to the Recycling Centres and would come with the added impact on the environment, local communities, and landowners, particularly local farmers.

4.2.3 The council is aware of these concerns and of the hugely negative impact that fly-tipping can have on our communities. Research published by the climate action charity WRAP, the Waste and Resources Action Programme, in 2021 looked at fly-tipping rates in both those local authorities that charged for DIY waste and those that didn't and "found no evidence of an association between fly-tipping and charging at HWRCs."¹

4.3 Rates: belief that all waste disposal should be covered by council tax or business rates

4.3.1 The consultation included a statement that:

"The requirement for Recycling Centres to accept waste does not extend to commercial waste (or business), waste from construction and demolition activities, or certain categories of waste including asbestos and tyres"

4.3.2 Despite this, many respondents, both residents and businesses, believed that Derbyshire County Council should accept all waste without restriction with this being covered by existing council tax or business rates payments.

4.3.3 However, results of the survey showed support for the introduction of the government's DIY definition (70%), and there was a clear majority of both residents (83%) and businesses (80%) that believed that businesses should

¹ See WRAP, 2021, '[The relationship between fly-tipping rates and HWRC charging](#)' (page 5).

be able to use Recycling Centres for a charge, suggesting an awareness of the need for certain restrictions.

4.3.4 From the comments received about charges for businesses there was a near equal split between those wanting the council to do more to support small businesses i.e. provide free waste disposal, and those that felt that Recycling Centres should be for households only, with businesses, not taxpayers, responsible for the costs of business waste disposal. This was also the case with comments about charges for asbestos and tyres with a nearly identical percentage of comments advocating for no charges as opposed to those agreeing with the charge, or even a higher charge than proposed, to ensure that the cost of uncommon items is not borne by the taxpayer.

4.4 Feedback on the survey itself

4.4.1 A number of comments made in the survey, and in direct emails, expressed concern that the survey did not provide the option to keep the current service as it is, and some respondents believed the consultation was biased in favour of an already decided outcome.

4.4.2 Some respondents believed that indicating a preference to pay for the disposal of asbestos and/or tyres would be taken as an indication of support for the change when their actual preference is that no change be made at all. No such inference has been made. Where residents initially express a preference for the sites to continue to accept asbestos and tyres, it has been assumed that this is on an 'as-is' basis i.e. without charge.

4.4.3 Many respondents used the comment boxes provided to express their opinion that the service should not be changed, and these views were captured and quantified in the survey analysis above.

4.4.4 Feedback on the survey structure and questions will be used to help improve future public consultation and engagement exercises.

4.5 Registration and vehicle counting: better clarity needed on how the system will work

4.5.1 The survey highlighted that a registration system will be introduced to enable better management of the Recycling Centres, and that this will include updates to the existing cameras and vehicle counters across the county.

4.5.2 This raised concerns about the introduction of ANPR [automatic number plate recognition] and how the system might be used to restrict access – one resident was worried that their company car, which is registered out of the county, would generate a penalty notice every time they used the site, while

many highlighted that they use friends or family vehicles who may also not be Derbyshire residents.

- 4.5.3 Despite 85% of respondents saying they would have no problems registering their vehicle online there is still a significant number of Derbyshire residents who do not have reliable access to the internet, or who would prefer another method of registration. This issue of digital exclusion will need to be addressed to ensure fair access for everyone in Derbyshire.

4.6 Concern from people living on the borders with other counties

- 4.6.1 Linked to the above issue, there was concern raised from both residents of Derbyshire and the neighbouring counties that they would lose access to their nearest Recycling Centre. For some Derbyshire residents their nearest centre is outside of the county, while there are also some people who live just outside Derbyshire, but their nearest centre is in Derbyshire.
- 4.6.2 Both sets of respondents expressed concern that any possible change of access to residents only would mean that they are blocked from using their nearest centre and would have to make much longer trips to find their nearest in county facility, with an increased environmental impact from their increased journeys.