



Report to Cabinet

Date:	12th December 2023
Reference number:	N/A
Title:	Proposed changes to the Waste Access and Acceptance Policy for the Household Recycling Centres (HRC) for charges relating to DIY waste
Cabinet Member(s):	Gareth Williams Cabinet Member for Climate Change and Environment
Contact officer:	Gurbaksh Badhan, Head of Strategic Waste Management and Enforcement (Gurbaksh.Badhan@buckinghamshire.gov.uk)
Ward(s) affected:	All wards
Recommendations:	<p>It is recommended that Cabinet approves the following recommendations to take effect from the date of compliance on 31st December 2023.</p> <ol style="list-style-type: none">1. Cabinet agree the principles as set out in the draft Waste Access and Acceptance Policy (WAAP Appendix 1) which stays the same except for charges for non-household waste under the legislative threshold to be removed AND in principle approval of the draft policy in line with changes set out in the legislation.2. To remove the charging for non-household DIY waste for those eligible below the free threshold in line with the legislation for Buckinghamshire Council residents and noting that charging remains in place for above the threshold for all DIY/construction and industrial waste (also known as non-household) for Buckinghamshire users across the HRC network.3. To maintain charging for all waste types for non-Buckinghamshire Council residents across the HRC network and no free thresholds will apply (waste quantity and frequency of visits) unless a service level agreement is in place.

4. **That authority is delegated to the Director of Legal Services, Director of Neighbourhood Services and the Head of Strategic Waste Management and Enforcement in consultation with Cabinet Member for Climate Change and Environment to undertake all necessary appropriate steps in relation to finalising and adopting the revised Waste Acceptance and Access Policy (WAAP Appendix 1), after considering relevant Equality Impact Assessment and Data Protection Impact Assessment, and to make necessary changes arising from any enacted legislation.**
5. **To note that the financial implications associated with the recommendations form part of the Council's budget setting processes Medium Term Financial Plan (MTFP) 2024/25–2027/2028.**

Reason for recommendation:

1. To prepare for implementation of the Government's legislative changes to introduce reduced charging powers for Waste Disposal Authorities (WDA) and remove charges for waste derived from small scale home improvements (household DIY waste). As a result, the Council's current Waste Access and Acceptance Policy (WAAP) for the Household Recycling Centres (HRC) will need to be amended to accommodate the change. Owing to the tight timeframes for implementation, authority is sought to enable policy changes to be made and notification of the change to be managed.
2. The new legislation will come into force on 31st December 2023.

1. Executive summary

- 1.1 The Council are the Waste Disposal Authority (WDA) and are under a statutory duty to provide HRCs under the Environmental Protection Act (EPA) 1990 Section 51 and the WDA provides 10 sites across the county operated under contract by FCC. Under the EPA 'household' waste has to be accepted without charge at HRCs and the existing legislation allows the WDA to charge for certain 'non-household' or DIY/ construction/ demolition type waste streams. The Council introduced charging for these non-household waste streams in April 2019.
- 1.2 On 18 June 2023, the Government announced their intention to abolish charges on small amounts of DIY wastes brought to HRCs by setting a minimum threshold level to be accepted without charge. On 21 November 2023 the new regulations were laid in Parliament and stated that:

Waste from construction or industrial waste, demolition works, including preparatory works is to be treated as household waste for the purpose of (a) Section 32(2) and (2a) of the Act, (disapplication of Section 34(1) and duty of the occupier of domestic property to transfer household waste only to an authorised person or for authorised transport purposes); and (b) section 51 of the Act (functions of waste disposal authorities, but only where-

 - i. The waste is produced at a domestic property by occupiers of that domestic property carrying out their own construction or demolition works, including preparatory works;

- ii. The waste is not from construction or demolition works, including preparatory works, for which payment has been or is to be made;
- iii. The amount of waste delivered to any disposal site in a single visit is either –
 - a. Less than 100 litres and capable of being fitted into two 50 litre bags OR
 - b. a single article of waste no larger than 2000mm x 750mm x 700mm in size and;
- iv. Waste delivered to waste deposit sites does not exceed four single visits per household in any four week period.

1.3 The current WAAP charges for all non-household waste streams. Under the legislative changes any DIY waste produced by a tradesperson, including landlords, will remain liable to a charge without any free threshold. As such, no changes to WAAP are required in respect of tradespersons or commercial waste. The changes required to WAAP relate only to the charges for Buckinghamshire Council residents for household DIY waste over the free threshold of one load per week at HRCs and non-Buckinghamshire Council residents for all waste types. Due to the short timeframe, we may not be able to implement a robust management system which would have been more streamlined (likely to centre around a revised version of the Council's current e-permit system) by 31st December 2023. We are working on this to understand the requirements in order to implement the new e-permit system and this will be implemented during 2024. We are therefore recommending a phased approach with full implementation no later than the July 2024. This report sets out the changes and how we will implement this.

2. Main body of report

- 2.1 The Council currently operates 10 HRC sites across the county, and around 85-90% of the waste received at these centres (measured by tonnage) is accepted without charge for Buckinghamshire residents as household waste. However, since 2019 a range of DIY type materials (construction, demolition, and landscaping) have incurred a charge. The Council is currently permitted to charge for these streams as they are considered non-household waste streams under the existing Controlled Waste Regulations 2012.
- 2.2 The Council introduced charging for non-household waste streams in April 2019 as a key part of financial savings with a range of measures including reducing opening hours at all HRCs, reducing opening days at some HRCs from 7 days to 5 days per week and the closure of Bledlow HRC. This was designed as a MTFP requirement to reduce costs by over £1m.
- 2.3 Since charging for DIY waste was introduced, payment transactions number in the region of 50,000 per annum, which would indicate that around 1 in 20 HRC users/ visitors are bringing in such waste. The HRC sites receive over 1.2 million visits per annum.
- 2.4 On 18th June 2023, the Government announced that it "...will abolish the fees which some local authorities charge for disposing of DIY waste at household waste recycling centres (HWRCs). This will support householders to dispose of their waste in a responsible manner and encourage recycling". The Government believes that "This will make it much easier and cheaper for people making home improvements to get rid of their waste – and may reduce the temptation to use waste cowboys who fly-tip rubbish".

2.5 To apply this change, the Government has amended the existing Controlled Waste Regulations 2012 (CWR). In summary these changes have the following key principles and implications for the Council.

- a. Clarification that home improvement works undertaken by a tradesperson, including landlords, would not fall under the changes and can still be charged for in full without any free threshold limits;
- b. Small-scale household DIY projects will have a set legislative de-minimus level which is required to be accepted for free within a set frequency of visits and volume of waste permitted, please see Appendix 5 for further information. The Council would therefore be able to charge for waste exceeding the de-minimus threshold (large-scale DIY projects). The threshold set as waste delivered in a single visit that does not exceed the equivalent of the following:
 - Less than 100 litres and capable of fitting into two 50 litre bags OR a single article of waste no larger than 2000mm x 750mm x 700mm in size.

In addition, waste delivered to waste deposit sites does not exceed four single visits per household in any four week period.

- c. The Government believe that a limit is necessary to prevent abuse of the system by traders who should be paying for waste disposal;
 - d. The Council can charge for all waste types including all DIY waste for non-Buckinghamshire users across the HRC network unless a service level agreement is in place with the relevant neighbouring authorities;
 - e. Commercial construction and industrial waste will continue to be subject to charges with no free threshold limits.
- 2.6 The Government introduced secondary legislation in the form of a Statutory Instrument (SI) on 21st November 2023 to amend the CWR. Please see Appendix 5. To ensure that we are ready to implement the new changes by 31st December 2023 a decision is sought to agree a draft WAAP, please see Appendix 1 for further information. Officer delegations are sought to finalise WAAP taking into account any EqIA and DPIA assessments.

Proposed new DIY permit

2.7 Since October 2006 there has been a waste access and acceptance policy (WAAP) in place at all of the Councils HRCs. The WAAP sets out the rules that govern how the HRC sites operate and as such will be the document that will need to change to incorporate the legislation changes enabling charging only for household DIY waste above the free threshold level at all of Buckinghamshire Council's HRCs.

2.8 The WAAP requires specific changes to introduce the legislative changes. The proposed recommendations in this report have been reflected in the draft WAAP, please refer to Appendix 1. Below is a summary of the proposed updates and supported by recommendation 1:

- Removal of charges for household DIY waste from Buckinghamshire Council residents for the minimum threshold allowed by legislation.

- A new DIY waste e-permit to be introduced to facilitate and support identification of those eligible below the free threshold and charging remains in place for above the threshold for all household DIY/construction and industrial waste (also known as non-household).

The following aspects of the WAAP are to remain and continue in place:

- Non-Buckinghamshire households: Controls for cross border use to be managed part through direct administrative arrangements with neighbouring local authorities and part through the charging for non-household waste.
- Charging non-Buckinghamshire users for waste acceptance and access for all waste types.
- Commercial waste from landlords and traders will be charged in full with no free threshold.

Proposed administration of new DIY e-permit

2.9 An example of how the free threshold eligibility would work in practice is set out below.

Step 1: A customer will apply for an e-permit on the Council website. If householders do not have an e-permit when visiting the HRC, staff will ask householders to park up on site and complete an e-permit before depositing of waste. If this is not possible, staff will require householders to complete an e-declaration otherwise they will not be able to dispose of any household DIY waste.

Step 2: The customer enters basic details to ensure they are using the right service and are abiding by the WAAP. The customer will be advised that the DIY waste e-permit allows free disposal of household DIY waste up to:

- a. One visit with;
- b. One load - One load is defined as up to 100L (loose waste capable of being fitted into two 50L rubble bags);
- c. **OR** one large item 2m x 0.75m x 0.70m. These loads are examples of total size. Residents will likely bring waste in smaller bags or larger items broken up.
- d. Part loads will be classed as a full load for the free threshold limits. Site staff will make the final decision as to the total volume of waste.

Step 3: The permit is valid for 7 days. The customer will receive an electronic copy of their DIY e-permit to their email inbox.

Step 4: Customer arrives on site, shows their proof of address and DIY waste e-permit to the member of staff at the entrance. Site staff will estimate the volume of DIY waste and how many loads it constitutes. Standard containers of 25ltrs can be used in the case customers disagree.

Step 5: Site staff will scan the DIY waste e-permit to register the visit and the quantity of DIY waste.

Step 6: If householders have exceeded their free allowance, they can either:

- a. Wait until the 7 day period ends and then renew their household DIY waste e-permit, before visiting again, or
- b. Pay for the extra household DIY waste, over the free allowance, they would like to bring.

Step 7: The DIY waste e-permit automatically ends after 7 days. A customer can renew a DIY waste e-permit at any stage after the 7 days have passed.

- 2.10 To implement these changes, it will be necessary to create a new household DIY Waste e-permit, alongside the existing permits. We have worked closely with the web development team to create a new e-permit. The new permit will be ready by the 31st December 2023.
- 2.11 There would be an increase in the number of HRC users that would need to use the household DIY e-permit before visiting the HRCs, many having never used the e-permit system before. The design of the household DIY e-permit will be as streamlined as possible, without losing the essential monitoring and deterrence functions. Given the short timescales there are streamlining limitations, for example the household DIY waste e-permit will be in addition to any other permits, which will mean some residents require two permits (e.g., for household DIY waste and a large trailer). Additional functionality to streamline the whole e-permit system can be accommodated into the new CRM updates due in Summer of 2024 and may incur between £8,000-£16,000 in one-off development costs.

The Councils e-permit system is currently used to control commercial type vehicles, those arriving on foot or with a large trailer. The e-permit system is considered to be a proportionate control measure to monitor suspected commercial abuse, whilst still being convenient for the vast majority of residents. This means any Buckinghamshire resident or neighbouring authority with a service level agreement (SLA), such as Slough Borough Council, would need to apply for the permit in advance of delivering the household DIY waste to the HRCs. No DIY waste would be accepted without an e-permit or charges maybe applicable. This is supported by recommendation 1.

Cross Border Usage

- 2.12 It is recognised that, in some locations, the network of Buckinghamshire HRCs is more convenient for non-Buckinghamshire residents to access compared to similar facilities within their own administrative area. The Council is not encouraging “out of area” users to use its HRCs.
- 2.13 It is recommended that charges are introduced for non-Buckinghamshire residents, in accordance with powers set out in Paragraph 51(3) of the EPA 1990, rather than prohibit use of the HRC amenities, unless a service level agreement is in place with the relevant neighbouring authorities, such as with Slough Borough Council. The Council can introduce charges for non-Buckinghamshire residents across all HRCs for waste acceptance and access for all waste types outside of its administrative area including DIY waste and no free threshold will apply. E-Residency checks in place across all HRCs e-permits will not be required for non-Buckinghamshire residents as there is no risk of abuse given that all waste types are charged for.

Historic Waste Volumes and Visitors across the HRCs

- 2.14 Since 2019 waste volumes have reduced by 42% and visitor numbers have also reduced by approximately half a million per year (see Appendix 2 – Table 1, Fig 1 and Table 2, Fig 2). Both these changes correlate to when charging was introduced for DIY waste. It is difficult to accurately predict the full extent and impact of those new changes and whether it will fully reverse these numbers,

however, it is reasonable to assume waste volumes and visitor numbers across the HRC network will increase following the Governments changes.

- 2.15 It is likely (though difficult to prove) that a lot of the waste that was handled at the HRCs prior to 2019 was in fact from commercial/ trade sources. The trends and patterns from historic tonnages show there is an increased risk that the Council will again be managing commercial waste for free, which local authorities have no duties to do so. The Council is able to charge for commercial waste brought in by a tradesperson, including landlords with no free threshold limits.

Fly-Tipping

- 2.16 Based on past experience the Council does not expect to see a decrease in fly-tipping with the Government's changes. Since 2020 some 47% of fly-tips investigated have involved trade waste (which was never 'free') and 46% involved only waste which the householder could have recycled free of charge had they chosen to do so. 93% of investigated fly-tips were unaffected by any charges at the HRCs. Only 7% included at least one chargeable item that was found dumped – even here it was just a portion of the fly tip, for instance in a carload of waste with a single tyre or other similar chargeable item.
- 2.17 The complexities around implementing the legislation changes could be compounded when a trade person offering discounts for commercial work if the householder brings it along to an HRC. The legislation change proposals are highly likely to increase taxpayer's costs for the disposal of commercial waste, the Council should consider robust enforcement as part of the draft WAAP policy (Appendix 1)
- 2.18 In June 2021 Waste Resources Action Programme (WRAP) published a report, 'The relationship between fly-tipping rates and HWRC charging' which concluded there was no link between charging and fly-tipping at recycling centres. The research also considered a range of other factors such as deprivation - again the report did not find evidence that HRC charging is associated with higher rates of fly-tipping. In April 2022 the National Audit Office (NAO) called on the government to "better understand the relationship" between landfill tax rates and incentives to commit waste crime. The NAO warns that organised crime groups are becoming "more involved" in the waste sector.
- 2.19 Five recommendations are proposed in this report covering the changes required, which can be summarised as follows:
- i. Implement free disposal of household DIY waste materials up to the threshold levels (as detailed earlier). This will allow Buckinghamshire residents and neighbouring authority residents who have an SLA in place (Slough Borough Council) the free threshold of household DIY waste and charges would apply above the threshold.
 - ii. Retain charging non-Buckinghamshire users for all waste types and access with no free threshold limits. There are lower risks, lower opportunity for commercial abuse and lower financial implications with this option Due to the short timeframe with legislation only being enacted on 21st November 2023, we may not be able to implement a robust management system to operate and enforce the new charging

principles by 31st December 2023. It is therefore proposed to implement a phased approach with full implementation no later than July 2024.

- iii. Amend and update the revised draft WAAP.

2.20 The central Pros and Cons of the recommendations can be summarised as follows:

- i. Pros – Makes full use of the threshold limit and includes the most sophisticated operation and enforcement processes and therefore has the lowest risk of abuse by traders and the lowest cost impact to the Council.
- ii. Cons – Implementation of a new enforcement and monitoring system as part of WAAP is more complex and will take time to implement. In particular, in the short term there are risks over the ability to implement by 31st December 2023.

Cons – Increase in customer contact both online and at the Customer Service Centre and there is likely to be an increase in complaints.

Cons - Additional functionality likely required to streamline the whole e-permit system and may incur between £8,000-£16,000 in one-off development costs.

3. Other options considered

Option A: Do nothing. This would mean no changes would be implemented in line with the legislation. This is not a recommended option.

Pros – No resource cost implications to implement.

Cons – The Council would be acting outside its legal powers which would result in reputational, legal, and financial consequences for not complying with the legislation.

Option B: Remove all charges for construction and industrial waste (household DIY waste). This would mean all household DIY waste is allowed in for free across all the HRCs, no visitor frequency limits, or volume restrictions would apply. This is not a recommended option.

Pros – No control measures at the site entrance which will make it easier for HRC site users. Customers would prefer this option.

Cons – There would be congestion at the sites and there would be cost implications of up to circa £1.8m per annum. It is likely a large portion of this cost will come from abuse by commercial/ trade persons and landlords.

Option C: Control the quantity of household DIY waste allowed in for free, apply charges above threshold and not monitor the frequency of visits of householders. There are risks and financial implications related to commercial abuse with this option because the frequency of visits is not being monitored. This is not a recommended option.

Pros – Allows limited enforcement of the scheme. Customers would prefer this option.

Cons - Likely to be significant costs as there is only limited capacity for controlled household DIY waste. Implementation of a new enforcement and monitoring system as part of WAAP.

Option D: Control the frequency of visits of Buckinghamshire residents and Local Authorities with an SLA in place (Slough Borough Council) for household DIY waste but apply no limit to the quantity accepted without charge. There are risks and financial implications related to commercial abuse with this option because the quantity of household DIY waste is not being monitored. This is not a recommended option.

Pros – Allows for limited enforcement of the scheme.

Cons – Likely to be significant costs as there is limited capacity for controlled waste and if frequency of visits is not monitored and charges applied as part of this process there is increased risk of commercial operators benefitting from the householder concession and loss of revenue for excess deposits. Implementation of a new enforcement and monitoring system as part of WAAP.

4. Legal and financial implications

Legal Implications

- 4.1 The Council's HRC service is provided under the Environmental Protection Act 1990. Section 51 requires the Waste Disposal Authority (WDA) to arrange for places to be provided at which residents may deposit household waste and for the disposal of any waste deposited. The arrangements should secure that each place is:
- a. Situated within the area or so as to be reasonably accessible to persons resident in its area;
 - b. Available at all reasonable times (including at least one period on the Saturday or following day or each week, except the 25th December or 1st January); and
 - c. Available for the deposit of waste free of charge by residents.

However, the arrangements may restrict the availability of specified places to specified descriptions of waste.

- 4.2 The WDA may also include arrangements for the HRCs provided 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.
- 4.3 Household waste is defined in the Controlled Waste (England and Wales) Regulations 2012. Construction and industrial waste is defined as industrial waste, regardless of whether it is produced from domestic premises or not. However as from 31 December 2023 the new legislation disapplies the definition in relation to household DIY waste up to the thresholds set out in the main body of the report so that it is treated as household waste.
- 4.4 The Local Authorities (Prohibition of Charging Residents to Deposit Household Waste) Order 2015 prohibits WDAs from charging its own residents to enter into, or exit from, a HRC or deposit household waste at an HRC. This prohibition will apply to the below threshold DIY waste as this is treated as household waste.

Financial implications

- 4.5 The implementation of changes are not anticipated to have a significant cost as essentially, they are administrative changes to existing systems. However, further enhancements to the new Abavus platform once it is launched in July 2024, may cost in the region of £8,000 dependant on the complexity. Changes to tonnages into the HRCs could be significant and in the worst-case scenario, it is estimated the Council will see an increase of 27,000 tonnes on top of the current approximate 50,000 tonnes per annum that the HRCs currently handle across all waste streams. This additional tonnage is made up of the chargeable materials along with residual waste and wood waste.
- 4.6 The financial implications of these changes (recommendations 1-5) are set below and are based on the following key assumptions:
- It is assumed that there will be a 50% increase in the amount of new household DIY type waste coming into the site for free, which equates to approx. 6,500 tonnes of household DIY waste, alongside an additional 7,000 tonnes of other waste streams, this is based on historic volumes between 2015/16-2018/19.
 - It is assumed that a significant but unknown proportion of this additional waste is commercial waste which will find its way into the HRC network and/or disposal costs (assumed within the 50%). Currently this waste is likely to be finding legitimate, alternative routes such as skip hire, skip bags etc. (monitored through historic waste volumes and actual waste volumes across collection and disposal).
- 4.7 Using the assumptions set out above the impact of the new legislation on the current costs for disposal and loss of income are set out in table 3 below. The low-risk numbers represent the envisaged costs of implementing recommendations 1-5;

Table 3 MTFP proposals considering the legislation implications across treatment and disposal contracts

Contracts		MTFP 2024/25 £	MTFP 2025/26 £	MTFP 2026/27 £	MTFP 2027/28 £
HRC	Low Risk	321,693	331,344	337,971	344,730
	High Risk	643,386	662,688	675,942	689,460
Green Food Bulky Wood Waste	Low Risk	136,012	140,093	142,895	145,752
	High Risk	272,025	280,185	285,789	291,505
Energy from Waste	Low Risk	384,701	396,242	404,167	412,251
	High Risk	769,403	792,485	808,334	824,501
Total	Low Risk assumed in MTFP proposal	842,407	867,679	885,033	902,733
	High Risk unbudgeted in MTFP proposals	1,684,814	1,735,358	1,770,065	1,805,467

4a Director of Legal & Democratic Services comment

The Director has read the report and comments have been incorporated accordingly.

4b Section 151 Officer comment

The Director has read the report and comments have been incorporated accordingly.

5. Corporate implications

5.1 Corporate implications have been considered as below:

- a) Property – no implications
- b) HR – no implications
- c) Climate change

The Household Recycling Centre Service contract has an overall performance target to achieve reuse, recycling, and composting target of 68%. The HRC contract has an aspirational reuse, recycling, and composting performance target of 73% or more. It is reasonable to assume due to the anticipated increased waste volumes, the performance targets may become stretching to contribute to the Climate Change and Air Quality Strategy goals.

If the Council considers it appropriate to deliver higher aspirational performance targets for reuse, recycling, and composting, for example but not limited to climate change, there are envisaged service cost changes which may require the Council to invest. This will be monitored and reviewed as part of the Council's MTFP.

In Monthly and Annual Reports, the Contractor is required to record and report the measurement of performance against agreed carbon metric baselines, to demonstrate agreed improvement against targets over the Contract period. This includes any changes to environmental legislation.

- d) Sustainability

There is a requirement for FCC Waste Services (UK) Ltd to reduce the environmental impact of the services provided during the contract term. The solutions align with both the proximity principle and reducing vehicle emissions, therefore reducing transportation requirements i.e., carbon, including optimising vehicle routing and how the various waste materials are managed.

The HRC contract requires FCC Waste Services (UK) Ltd to manage recyclable and non-recyclable waste delivered to the HRCs through the most appropriate route, FCC Waste Services (UK) Ltd is required to deliver performance through reuse, recycling, composting and diversion from disposal (landfill and treatment).

- e) Equality

By its nature the changes to the Policy are not expected to have a disproportionate impact on any group with protected characteristics. However protected groups may be affected by the implementation of the changes such as the permit system and when visiting a HRC. As the change to the policy is a legal requirement an Equalities Impact Assessment (EqIA) will be completed so that any impacts of implementation can be identified and considered when putting into place relevant processes and procedures.

- f) Data

More information will be collected from individuals for permit purposes and whilst this is likely to be an extension of the current permit processes further consideration of how this information will be used, especially in relation to identifying potential evasion of charges, is ongoing. A Data Protection Impact Assessment (DPIA) is currently being drafted and refined to be used in the design of and /or change to the permit system.

g) Value for Money

The recommendation provides an acceptable balance between value for money (VfM) and service provision requirements compared to other options considered.

h) Health and Safety

Body Worn Video (BWV) are worn by HRC site staff for conflict management and handling for customers and site staff. The recordings can be used to help undertake incident investigations for example, customer complaints, abusive threatening behaviour, and crime prevention. There are relevant notices and signage at each HRC site to confirm that this activity is being undertaken.

6. Local councillors & community boards consultation & views

- 6.1 The WAAP is an adopted policy by the Council and was last reviewed January 2023, the fees and charges are reviewed annually as part of MTFP and budget setting cycle, including budget consultation. We will also include updates to local Councillors & Community Boards as part of the communications plan. We expect to engage on key points of how we communicate and the details of the proposed implementation.

7. Communication, engagement & further consultation

- 7.1 The outcome of the decision will be communicated clearly to all stakeholders. A high-level communications plan is being developed and will be completed with detailed methods of engagement as soon as implementation plans are finalised (post decision). Stakeholders include:

- Residents
- Parish and Town Councils and elected Members
- BC Teams – Waste, Customer Services, Business Support, Communications, Libraries
- FCC Environment and site staff – on site digital signage
- Local and Social Media
- Neighbouring Local Authorities

- 7.2 As part of the annual customer satisfaction survey, we will gauge resident awareness of the changes, satisfaction with the new system and any changes in behaviour as a result. The survey is conducted in May/June and can be compared to previous annual surveys.

8. Performance Review

8.1 Post implementation of the changes, a review will be undertaken approximately in 6 months' time, July 2024 onwards. The performance review will consider the use of the household DIY permit, overall e-permit system, staff feedback, impacts of any abuse of the system and consider any further necessary changes.

8.2 The performance review will consider the following information:

- Monitoring systematic abuse from information obtained from the e-permit system;
- Monitoring site staff checks and contractor feedback (ID/residency checks, declarations, contract reporting and monitoring information);
- Monitoring visitor and tonnage numbers;
- Monitoring financial implications;
- Monitoring customer contacts and feedback, including from Slough Borough Council;
- Monitoring fly-tipping.

9. Next steps and review

9.1 Following the decision being made the following next steps will be actioned:

Next step	Indicative date
Cabinet meeting	12 December 2023
Statutory Instrument (legislation) published by Government. Compliance by 31 December 2023.	21 November 2023
Implementation of proposed charging changes to be implemented by the legislation compliance date.	31 December 2023
Key Implementation activities	
Enhancement of e-permit/digital solution to track and monitor control measures.	December 2023
Customer service contact centre – provide FAQs and scripts	December 2023
Prepare site for operational use: <ul style="list-style-type: none"> • FCC Waste Services Ltd (UK) to train HRC staff. • Signage 	December 2023
The Communication plan will target: <ul style="list-style-type: none"> • Residents • Parish and Town Councils and elected Members 	December 2023 – March 2024. As part of normal business as usual activities there will be ongoing HRC communications related to these changes.

<ul style="list-style-type: none"> • BC Teams – Waste, Customer Services, Business Support, Communications, Libraries • FCC Environment and site staff – on site digital signage • Local and Social Media • Neighbouring Local Authorities <p>Focussing on key messages:</p> <ul style="list-style-type: none"> • Small amounts of household DIY waste can now be disposed of for free from 31 December 2023 • Residents must have a valid household DIY waste e-permit before visiting the site. • Any waste brought over the free allocation will still be charged for. • DIY waste produced by traders at residential properties will be charged for, whoever brings the waste to site. • Communication channels: <ul style="list-style-type: none"> • HRC digital screens • HRC site signage • Press release • Social media • Websites • Google business listings • Waste Wizard updates 	
<p>Performance review</p> <p>To consider the following information:</p> <ul style="list-style-type: none"> • Monitoring systematic abuse from information obtained from the e-permit system; • Monitoring site staff checks and contractor feedback (ID/residency checks, declarations, contract reporting and monitoring information); • Monitoring visitor and tonnage numbers; • Monitoring financial implications; 	<p>July 2024 onwards</p>



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| <ul style="list-style-type: none">• Monitoring customer contacts and feedback, including from Slough Borough Council;• Monitoring fly-tipping | |
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10. Background papers

10.1 The following background papers are included with this report:

Appendix 1: DRAFT Waste Access and Acceptance Policy WAAP 2023

Appendix 2: Tonnage and Visitors across all HRC Sites per annum

Appendix 3: HRC Charging Changes - Equality Impact Assessment Screening Questionnaire

Appendix 4: HRC Charging Changes - Data Protection Impact Assessment Screening Questionnaire

Appendix 5: The Controlled Waste Regulations – Statutory Instrument

11. Your questions and views (for key decisions)

11.1 If you have any questions about the matters contained in this report, please get in touch with the author of this report. If you have any views that you would like the cabinet member to consider, please inform the democratic services team. This can be done by email to democracy@buckinghamshire.gov.uk.