

**SCRUTINY COMMITTEE**

**Wednesday, 23rd May, 2012**

**10.00 am**

**Darent Room, Sessions House, County Hall,  
Maidstone**







## AGENDA

### SCRUTINY COMMITTEE

**Wednesday, 23rd May, 2012, at 10.00 am**  
**Darent Room, Sessions House, County**  
**Hall, Maidstone**

Ask for: **Anna Taylor**  
Telephone: **01622 694764**

#### Membership

Conservative (7): Mr R F Manning (Chairman), Mr B R Cope, Mr D A Hirst,  
Mrs S V Hohler, Mr R A Marsh, Mr J E Scholes and Mr C T Wells

Liberal Democrat (1): Mrs T Dean

Labour (1) Mr G Cowan

Independent (1) Mr R J Lees

Church Dr A Bamford, The Reverend N Genders and Mr A Tear

Representatives (3):

Parent Governor (2): Mr P Myers and Mr B Critchley

*Refreshments will be available 15 minutes before the start of the meeting*

*Timing of items as shown below is approximate and subject to change.*

*County Councillors who are not Members of the Committee but who wish to ask questions at the meeting are asked to notify the Chairman of their questions in advance.*

#### Webcasting Notice

Please note: this meeting may be filmed for live or subsequent broadcast via the Council's internet site – at the start of the meeting the Chairman will confirm if all or part of the meeting is being filmed.

By entering the meeting room you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes. If you do not wish to have your image captured then you should make the Clerk of the meeting aware.

## **UNRESTRICTED ITEMS**

*(During these items the meeting is likely to be open to the public)*

### **A - Committee Business**

- A1 Introduction/Webcast announcement
- A2 Substitutes
- A3 Election of Vice Chairman
- A4 Declarations of Interests by Members in items on the Agenda for this Meeting
- A5 Minutes of the meeting held on 29 March 2012 (Pages 1 - 2)

### **B - Any item placed on the agenda by any Member of the Council for discussion**

- B1 Hawkinge Household Waste Recycling Centre Consultation (Pages 3 - 106)  
Item from Ms Carey

Following Cabinet's agreement to proposals set out in a report on 19 March 2012 Mr Sweetland took a decision on 3 April 2012 to agree changes to both the operating policy and the network infrastructure of the Household Waste Recycling Centres provided by Kent County Council, this included the closure of the Hawkinge household waste recycling centre.

Ms Carey has indicated that she wishes to raise the following points:

1. Out of date figures were being used;
2. Hawkinge is the only site not open at weekends;
3. No statistical information was available as to the number of users;
4. The figures quoted by way of savings appear to include costs which would be transferred to alternative sites upon closure; and
5. The public questionnaire was biased in the way Hawkinge was referred to.

## **EXEMPT ITEMS**

*(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)*

Peter Sass  
Head of Democratic Services  
(01622) 694002

**Tuesday, 15 May 2012**

*Please note that any background documents referred to in the accompanying papers maybe inspected by arrangement with the officer responsible for preparing the relevant report.*

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**KENT COUNTY COUNCIL**

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**SCRUTINY COMMITTEE**

MINUTES of a meeting of the Scrutiny Committee held in the on Thursday, 29 March 2012.

PRESENT: Mr B R Cope, Mr G Cowan, Mrs T Dean, Mr D A Hirst, Mrs S V Hohler, Mr R F Manning, Mr R A Marsh, Mr J R Bullock, MBE (Substitute for Mr J E Scholes) and Mr M J Jarvis (Substitute for Mr C T Wells)

ALSO PRESENT: Mrs P A V Stockell

IN ATTENDANCE: Mr P Sass (Head of Democratic Services)

**UNRESTRICTED ITEMS**

**1. Membership**

*(Item 1)*

The Committee noted its Membership as set out on the agenda.

**2. Election of Chairman**

*(Item 3)*

(1) Mr G Cowan proposed and Mrs T Dean seconded that Mrs T Dean be elected Chairman. On being put to the vote this proposal was lost.

(2) Mr D A Hirst proposed and Mr B R Cope seconded that Mr R F Manning be elected Chairman. On being put to the vote this proposal was carried.

(3) RESOLVED that Mr R F Manning be elected Chairman of the Committee.

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**By: Peter Sass: Head of Democratic Services**  
**To: Scrutiny Committee – 23 May 2012**  
**Subject: Hawkinge Household Waste Recycling Centre Consultation**

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## **Background**

- (1) Following Cabinet's agreement to proposals set out in a report on 19 March 2012 Mr Sweetland took a decision on 3 April 2012 to agree changes to both the operating policy and the network infrastructure of the Household Waste Recycling Centre provided by Kent County Council, this included the closure of the Hawkinge household waste recycling centre.
- (2) In accordance with the terms of reference of the Scrutiny Committee, Ms Carey has exercised her right to place the issue of the consultation undertaken in relation to the decision to close the Hawkinge household waste recycling centre on the agenda of the Scrutiny Committee.
- (3) Any Member has a legal right to place an item on the Scrutiny Committee agenda. In this case, Mr Sweetland's decision is not being 'called in' and therefore its implementation cannot be delayed or overturned by it being placed on the Scrutiny Committee agenda. The Committee may decide, however, to make comments or recommendations to the Cabinet Member for his consideration and response.

## **Documents**

- (4) The Chairman has determined that the following reports be attached:
  - Decision report attached at Appendix A.
  - Cabinet Report attached at Appendix B.
  - Public Consultation Report attached at Appendix C.
  - Equalities Impact Assessments attached at Appendix D.

## **Guests**

- (5) Mr B Sweetland, Cabinet Member, Environment, Highways and Waste has been invited to attend the meeting for this item.

## **Options for the Scrutiny Committee**

(6) The Scrutiny Committee may:

(a) make no comments

(b) express comments but not require reconsideration of the decision

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**Contact:** Anna Taylor      Tel: 01622 694764

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## KENT COUNTY COUNCIL

**DECISION TAKEN BY**

**Mr Bryan Sweetland, Cabinet Member for Environment  
Highways and Waste**

**DECISION NO.**

11/01815

**Unrestricted**

**Subject:** Review of Household Waste Recycling Centres and Future Service Delivery

(1) At its meeting on 19 March 2012 the Cabinet considered a report setting out the findings of a review of the Household Waste Recycling Centres.

(2) One of the proposals of the Cabinet report was to close the Household Waste Recycling Centre at Richborough but a petition was received opposing this and therefore the Cabinet at its meeting on 19 March resolved as follows:

(i) That all the recommendations set out on pages 329 to 331 of the Cabinet report be endorsed

(ii) It be noted that the petition received in respect of the proposals related to the Richborough Waste site will be debated at the meeting of the County Council on Thursday 29 March 2012.

(iii) As a consequence all the final decisions related to this matter are delegated to the Cabinet Member for Environment, Highways and Waste so that he can take these in the light of the Richborough Household Waste Recycling Centre debate at the County Council meeting on 29 March 2012.

(3) The proposal to close the Richborough Household Waste Recycling Centre was debated by the County Council at its meeting on 29 March 2012 and whilst the Council sympathised with the views expressed by the petitioners, no

reasons were presented to fundamentally change the Cabinet Report's recommendation. Indeed, the debate helped to reinforce the view that both the Richborough and Hawkinge waste sites should be closed as soon as financially, contractually and/or operationally viable.

(4) I have therefore decided, in accordance with the Cabinet report and the decision reached by the Cabinet at its meeting on 19 March, as follows:

The following operational policy changes are made at the household waste recycling centres.

- a) Tyres, asbestos and gas bottles are to be accepted by KCC's network of waste transfer stations only, and the quantity limited as follows.

Tyres:	Limit car tyres to a maximum of two, per visit.
Asbestos:	Limited to one sack or equivalent, per visit.
Gas bottles:	Limited to one "refillable" gas bottle, per visit.

A standard charge of £5 per unit (i.e. up to 2 tyres or one bag of asbestos or one gas bottle) is proposed, to be increased in line with future increases in disposal costs and administration.

- b) The amount of construction waste to be brought into a HWRC by any single vehicle, or combined vehicle and trailer, is to be set at a maximum of one car boot load of construction waste. This would be equivalent to 3 bags, of up to 30kg weight per bag, this being a bag weight that the average person can lift. The waste is to comprise spoil, hardcore, soil, rubble, or equivalent. For larger items such as baths, the material would not need to be bagged, but should not exceed approx. 90kg in total or one average car boot load per visit.
- c) All commercial vehicles including pick-up trucks, vans, agricultural vehicles including horse boxes are to be excluded from HWRCs.

An exception scheme for householders with disabilities using over-height vehicles is to be introduced.

A permit scheme for the small number of householders who do not own any other vehicle, other than an excluded vehicle, and those with large private vehicles is provided. All other conditions, such as the limit on construction waste, will continue to apply. Permits will provide access to the sites on up to 12 occasions per calendar year. Any additional applications for permits in one year from the same household will be subject to investigation to ensure the exclusion of trade waste.

- d) Access to HWRCs for trailers is limited to those of up to 1.0m<sup>3</sup> capacity. The total combined quantity of construction waste is to be limited as set out above. (The quantity is not to be doubled for a combined vehicle and trailer.)
- e) Support the development of additional commercial capacity where there is evidence of under-provision of waste disposal for businesses. Carry out a feasibility study on the opportunities at Kent County Council waste sites to promote cost-effective waste disposal capacity for businesses in order to ensure there are alternatives to fly-tipping.
- f) Provide close monitoring of fly-tipping across Kent to identify any hot-spots arising from the implementation of operational policy or network changes. Ensure prompt action and support to investigate offences and arrange for the removal of waste by working with the waste collection authorities. Launch a new media campaign based on zero-tolerance of fly-tipping and promoting responsible waste disposal.
- g) A comprehensive communications plan and information programme to be provided to support implementation of the operational changes.
- h) The existing permit scheme at Dartford Heath HWRC for Kent only residents is retained. A similar trial permit scheme is considered in 2013/14, at Swanley HWRC.

It is further recommended that the Corporate Director for Enterprise and Environment to implement the decision in respect of policy changes through a phased approach to ensure sufficient capacity to manage a smooth transition and to keep progress under continuous review to maximise customer service.

It is further recommended that the following changes are introduced in respect of the HWRC sites network:-

- i) Carry out a site search in respect of the North West Kent and Mid Kent areas.
- j) Close the Richborough and Hawkinge waste sites as soon as financially, contractually and/or operationally viable.
- k) Review the HWRC provision in the Swale area subject to a further member decision when the replacement site for Church Marshes TS/HWRC is established.

**Any Interest Declared when the Decision was Taken**

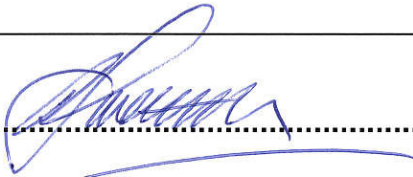
None

**Reason(s) for decision, including alternatives considered and any additional information**

I am taking this decision following endorsement of the recommendations of the report by Cabinet, a petition to County Council and the associated debate, and consideration of the public consultation responses and equalities impact assessment. The alternative options considered include not to make any changes to the operational arrangements at the household waste recycling centres and not to make any changes to the network infrastructure. Regard has been given to the budget provision and the medium term financial plan as well as the current capital programme which includes £18m of capital investment.

**Background Documents:**

Review of Household Waste Recycling Centres and Future Service Delivery - Cabinet Report (19 March 2012)  
Public Consultation Report – Household Waste Recycling Centres (February 2012)  
Equalities Impact Assessments (May 2011 – February 2012)



signed

03.04.2012

date

**By:** Bryan Sweetland, Cabinet Member for Environment, Highways and Waste  
Mike Austerberry, Corporate Director, Enterprise and Environment

**To:** Cabinet 19 March 2012

**Subject:** Review of Household Waste Recycling Centres and Future Service Delivery  
**For Decision**

**Classification:** Unrestricted

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**Summary:** This report sets out the findings of the Review of the Household Waste Recycling Centres (HWRCs) in Kent and recommends changes to the way the sites are to be operated and provided.

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## **1. Introduction and Review Process**

- 1.1 On 8th April 2011 the Environment Highways and Waste Policy Overview and Scrutiny Committee (POSC), agreed the terms of reference of a review of the Household Waste Recycling Centre (HWRC) service. The POSC agreed that an Informal Member Group (IMG) should guide the review. The Informal Member Group comprised:  
Councillors John Cubitt (chair),  
Mike Harrison,  
Steve Manion,  
Malcolm Robertson, and  
Elizabeth Tweed
- 1.2 The Informal Members Group reported the review findings back to POSC on 27 September 2011. The Committee supported the findings and referred the matter for public consultation.

The report from the Informal Members Group considered in detail the options for change relating to the operating policy of the sites and the household waste recycling centre network. The financial implications of the changes were confirmed as being consistent with the medium term financial plan and the current capital programme.

It was resolved that the recommendations of the Informal Members Group were supported.

- 1.3 Following the end of the public consultation on 9 February 2012, the Informal Members' Group met on 21 February 2012 to consider the outcomes, which have led to the recommendations in this report.
- 1.4 This decision report is structured as follows.

<b>Section</b>	<b>Heading</b>	<b>Page No.</b>
1	Introduction and Review process	1
2	Current arrangements	2
3	Public Consultation & Equalities Impact Assessment	4
4	HWRC: Operating policy	4
5	HWRC: Current network provision	9
6	HWRC: Future network provision	13
7	Operational Risk Management	18
8	Financial Considerations	19
9	Recommendations	19

## **2. Current arrangements**

- 2.1 As the waste disposal authority for Kent, Kent County Council has a statutory obligation under the Environmental Protection Act 1990

*“for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited”.*

There is no duty to receive trade waste and the household waste recycling centres are not licensed to do so.

- 2.2 The Act does not specify how many sites, the ratio of sites to households, or travel times. Most of the population of Kent is within a 20 minute drive of a HWRC.
- 2.3 Kent has 19 HWRCs, of which 6 are co-located with waste transfer stations. The sites are located largely as a reflection of historic factors, particularly in respect of those locations which are associated with closed landfill sites. Their distribution does, however, broadly reflect the centres of population in the county.
- 2.4 Map 1 below shows the network of transfer stations and household waste recycling centres across Kent with drive times.



### **3. Public Consultation and Equalities Impact Assessment**

- 3.1 Following the POSC meeting on 27 September 2011, a 10 week public consultation commenced on 1 December 2011 and ran until 9 February 2012 on options for change. A total of 3,499 responses were received; 3,456 from the general public and 43 from stakeholders. There were 2056 on-line responses and 1,400 hard copy responses.
- 3.2 A full Equalities Impact Assessment (EIA) was conducted prior to the development and delivery of the public consultation. This shaped the engagement and participation mechanisms, and identified Protected Characteristics which have the potential to be positively or negatively impacted by the proposed policies. This also ensured that particular attention was paid to engagement with minority groups in Kent.
- 3.3 The methodology for the consultation aimed to engage householders across all sectors of Kent's communities, providing residents with the opportunity to participate in the consultation. Of the 3,095 hard copies of the questionnaire distributed, 1,400 were returned; a 45% response rate. There were responses from 28 of the 305 Town and Parish Councils and 8 responses from the waste collection authorities.
- 3.4 A further EIA was undertaken following the consultation, confirming impacts already identified in the initial screening and interim EIA. Assessments will continue to monitor customer usage and feedback following the implementation of any policy changes, with appropriate action to be taken as required.

### **4. Household waste recycling centres: Operating policy**

- 4.1 The key policy areas are considered below. These are:-
- Limiting the materials coming into the sites; and
  - Limiting trade waste and non-Kent vehicles

Each is provided with a commentary on the original IMG/POSC position and a summary of the consultation response, as applicable.

- 4.2 The IMG was mindful that any operating policy changes would require sufficient communication to ensure that the public were aware of the changes. This has been reinforced through the EIA and is considered later in the report. In considering operational changes the IMG was also mindful that interventions which tended to reduce queues at HWRCs would help alleviate pressure on the sites, and respond to the public's on-going concerns about queues.
- 4.3 The efficiencies being taken forward recognise the difference in approach needed in respect of the fixed costs, predominantly in operating the sites, and the variable costs of disposal of the waste tonnage arisings. The variable costs are by far the larger element.

#### 4.3.1 Limiting the materials coming into the sites

##### POSC report:

Having in mind that the greatest cost in managing waste through the HWRCs is the treatment/disposal of the waste brought into the sites rather than the operating costs of the sites, the exclusion of non-household waste was seen as a priority by IMG. The IMG therefore focused in detail on tyres, asbestos and gas bottles.

It was proposed to:

- a) exclude all tyres on the basis that householders were unlikely to change tyres at home;
- b) exclude asbestos as the amounts being received were inconsistent with householder's arisings and were very likely to be the spoil from demolition;
- c) exclude gas bottles which are generally subject to re-use. (Small single-use gas containers would still be accepted.)

The IMG noted that construction waste in quantities clearly in excess of that which could be related to domestic DIY, were being deposited at the HWRCs on a daily basis. Even though hardcore and other materials could be recycled the IMG considered the processing cost of £400k per year to be excessive. It proposed to exclude construction waste.

The IMG was aware that at the same time alternative disposal routes would be required (albeit at a charge) and that this should be encouraged through both private and KCC owned waste transfer stations.

##### Consultation responses summary:

**Do you consider that items such as tyres, gas bottles, and asbestos, which are mainly commercial waste, should be excluded from HWRCs, provided that other routes are available?**

60% agreed, 32% disagreed and 8% answered don't know.

The four most recorded comments were:

- Materials may be fly-tipped
- Believe that these materials are generated by householders and they have a need for the HWRCs to accept them
- Customers want a one-stop-shop for all materials and convenience of service
- Lack of information about other disposal routes

**Would you support the exclusion of construction waste, which the HWRCs have no duty to accept and costs the Council money?**

65% agreed, 26% disagreed and 9% answered don't know

The four most recorded comments were:

- Increase in fly-tipping
- Penalises "the DIY person"
- Should charge for all construction waste regardless of source
- Lack of information about alternative disposal points

## Revised recommendations taking account of consultation and EIA:

The majority of respondents support change and agree that the material is mainly commercial waste. The comments support the need to implement the changes in a systematic way.

### (i) Tyres, asbestos and gas bottles

It is now proposed that these items/waste are accepted at waste transfer stations only, and the unit quantity limited as follows.

Tyres: Limit car tyres to a maximum of two per visit.  
Asbestos: Limited to one sack or equivalent per visit.  
Gas bottles: Limited to one gas bottle per visit.

Additionally a charging regime is now proposed for this waste, with a standard charge of £5 per unit (i.e. up to 2 tyres or one bag of asbestos or one gas bottle). This charge is set to be increased annually as necessary to cover any increase in disposal costs and administration. The consultation indicated that there was a need for the Council to consider ways to continue to provide this service, and a charge to cover disposal and administration costs would enable this need to be met.

### (ii) Construction waste

It is proposed that the amount of household waste to be brought into a site by any single vehicle, or combined vehicle and trailer, is to be a maximum of one car boot load of household construction waste. This is equivalent to 3 bags, of up to 30kg weight per bag, being a weight that the average person can lift. (For example - the bags are to be similar in size to a large sack of compost). The waste is to comprise spoil, hardcore, soil, rubble, or equivalent. For larger items such as baths, the material would not need to be bagged but should not exceed approx. 90kg in total or one average car boot load per visit. There is to be no limit on repeat visits as this is unenforceable across the network.

It is clear that this approach would bring the service in line with standard practice for most other waste disposal authorities, reducing arisings from the current disproportionately high levels as shown below.

### **Construction Waste Overview**

<b>Kg/household 2010/11</b>	<b>Kent</b>	<b>Medway</b>	<b>Surrey</b>	<b>East Sussex</b>
Total HWRC waste arisings	310	262	300	246.5
HWRC Residual waste	92.7	166.32	123.38	112.08
Soil hardcore	70.65	10.89	36.48	24.01
Soil/Hardcore % of total arisings	22.7%	4.2%	12.2%	9.7%

Source: DEFRA Waste Data Flow

The IMG was mindful that capacity must be provided for commercial waste to ensure proper disposal and to prevent fly-tipping. Clearly, there is a demand for cost-effective disposal of commercial waste, particularly from businesses which produce relatively small quantities of waste and/or produce

waste on an irregular basis. The waste transfer network of 6 sites is designated for charged-for waste. The transfer stations are provided with weighbridges linked to invoicing software, and are capable of producing waste transfer notes to comply with the waste Duty of Care Regulations. It is proposed that the waste transfer stations are provided and adapted as necessary to handle the tonnage of trade waste which may be displaced from the household waste recycling centres, so that this waste can be properly handled at a realistic charge.

(iii) Customer information programme

A comprehensive customer information programme regarding disposal options for these materials is proposed in advance of implementation and on a continuing basis.

(iv) Implementation of operational policy changes

It is proposed that the Corporate Director for Enterprise and Environment implements the roll-out of the policy changes regarding limiting materials in a systematic way, through a phased approach to ensure sufficient capacity to manage a smooth transition and to keep progress under continuous review to maximise customer service.

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#### 4.3.2 Trade and non-Kent Vehicles

POSC Report

The IMG was shocked to note the extent of trade waste being delivered on its sites' tour. The IMG felt that a blanket ban on all trade or potentially trade vehicles and trailers was necessary, with an exception scheme available only in very rare circumstances. The IMG also noted that some householders from Kent use the Cuxton, Medway site and that conversely, some Medway residents visit Pepperhill and other KCC facilities.

In respect of the county's western border, a permit scheme was proposed for the sites in proximity to the border, namely Dartford Heath, Swanley, Dunbrik and New Romney, in order to restrict usage to Kent householders.

Consultation responses summary:

**Would you support the exclusion of trade waste e.g. by ceasing to open the height barrier and excluding trade vehicles, which the HWRCs have no duty to accept and costs the Council money?**

67% agree, 25% disagree and 8% answered don't know

The five most recorded comments were:-

- Increase in fly-tipping
- Implement a charging scheme for traders
- What about householders who only have a van or hire a van.
- Allow all waste from anyone to save fly-tipping and generate income
- Encourage all waste to be disposed of responsibly

**Do you believe that it is reasonable for householders who do not live in Kent, and therefore do not contribute to funding of the sites, to be excluded from using Kent's HWRCs?**

59% agree, 34% disagree and 7% answered don't know

The three most recorded comments were:

- Reciprocal arrangements are required, balance needed, petty proposal
- Risk of fly-tipping
- Convenience to use nearest HWRC regardless of border

**Do you use HWRCs in other areas?**

92% answered yes and 8% answered no.

Of those that use sites in other areas, 57% use Medway sites

Revised recommendations taking account of consultation and EIA:

The majority of respondents support change, subject to an exception scheme in limited circumstances. Exclusion of commercial vehicles will reduce queues and congestion on sites, which has been repeatedly raised as an issue in consultation responses.

(i) Commercial vehicles

It is proposed that all commercial vehicles, including vans and pick-up trucks of any size, and agricultural vehicles including horse-boxes, are to be excluded. For the purposes of defining a commercial vehicle the definition applied by HM Revenue and Customs will be applied.

An exception scheme for customers with disabilities will be provided. In addition a permit scheme for the minimal number of householders who do not own any other vehicle other than an excluded vehicle, and those with large private vehicles (which cannot fit under the height barriers) will be established at nominated sites. All other conditions, such as the limit on construction waste, will apply. The permit scheme will provide access to the sites on up to 12 occasions per calendar year. Any exceptional application for further permits within a single year will be investigated to ensure the exclusion of trade waste.

The IMG was mindful that capacity for commercial waste must be provided to ensure proper disposal and to prevent fly-tipping. Clearly, there is a demand for cost-effective disposal of commercial waste, particularly from businesses which produce relatively small quantities of waste and/or produce waste on an irregular basis. The waste transfer network of 6 sites is designated for charged-for waste. The transfer stations are provided with weighbridges linked to invoicing software, and are capable of producing waste transfer notes to comply with the waste duty of care regulations. It is proposed that the waste transfer stations are provided and adapted as necessary to handle the tonnage of commercial waste which may be displaced from the household waste recycling centres, so that this waste can be properly handled at a realistic charge. If there is insufficient capacity further interventions may be required to ensure additional outlets.

## (ii) Trailers

Although there is a risk that a minority of traders may utilise trailers to access the HWRCs, it has been recognised that there is a genuine need by householders to use trailers in certain circumstances. Consequently, trailers are to be limited in size to approximately 1.0m<sup>3</sup> capacity, to assist householders, and for ease of manoeuvring on site. For clarity, the total combined quantity of construction waste is to be limited to 1.0m<sup>3</sup> and not to be doubled for a combined vehicle and trailer.

## (iii) Western Boundary

The existing permit scheme at Dartford Heath HWRC is to be retained. A permit scheme for Kent residents at other sites near the county's western boundary is not recommended, but a trial permit scheme is to be considered for the Swanley site in order to test value for money. It was considered that the cross-border movement of household waste was likely to be broadly similar in each direction, but this should be tested.

## (iv) Provision for Trade Waste

As a pre-requisite for the exclusion of construction and trade waste from household waste recycling centres, it is necessary to support the development of additional commercial capacity where there is evidence of under-provision of waste disposal for businesses. Collaboration with the Minerals and Waste Development Framework project will be valuable in taking this forward. Additionally a feasibility study is proposed on the opportunities at Kent County Council's waste sites to promote cost-effective waste disposal capacity for businesses in order to ensure there are alternatives to fly-tipping.

## (v) Implementation of operational policy changes

It is proposed that the Corporate Director for Enterprise and Environment implements the roll-out of the policy changes regarding trade waste in a systematic way, through a phased approach to ensure sufficient capacity to manage a smooth transition and to keep progress under continuous review to maximise customer service.

## **5. Household Waste Recycling Centres: Current network provision**

### POSC Report

- 5.1 It was considered that the design-build-finance-operate model, widely used in the waste industry, has become less attractive during the recession as the cost of private sector borrowing increased.
- 5.2 The IMG noted that in earlier years, capital funding for waste infrastructure had been provided primarily by Government grant, namely Waste Infrastructure Capital Grant (WICG). This funding was spent necessarily on projects with high deliverability, leading to some projects being deferred such as those with challenging waste planning permission issues.

5.3 It was clear that there had been significant investment in the past and that this should be sustained. The recent investment at Pepperhill and Manston Road, Margate sites was noted, together with the additional household waste recycling centre opened at New Romney in 2011, as evidence of continuing investment by the Council.

5.4 The Table below shows the current capital provision for waste management infrastructure.

WASTE CAPITAL PROGRAMME	TOTAL					Total Scheme Costs
	Previous Years Spend	2010-11 Spend	2011-12 Budget	2012-13 Budget	Forecast Future Years	
£'000s						
Herne Bay Site Improvement	95	0	250	1250	0	1,595
New Romney - New site development	520	1,475	32	0	0	2,027
Sub-total	615	1,475	282	1250	0	3,622
<b>Transfer Stations Improvements</b>						
TS/HWRC Swale	0	0	0	1,880	1750	3,630
TS/HWRC Ashford	0	0	750	4,250	0	5,000
TS/HWRC Tunbridge Wells	50	242	881	0	0	1,173
HWRC Mid Kent (TMBC)	0	0	0	0	2300	2,300
HWRC West Kent	0	0	0	0	2600	2,600
sub-total	50	242	1,631	6,130	6,650	14,703
<b>Total Waste Capital Programme</b>	<b>665</b>	<b>1,717</b>	<b>1,913</b>	<b>7,380</b>	<b>6,650</b>	<b>18,325</b>

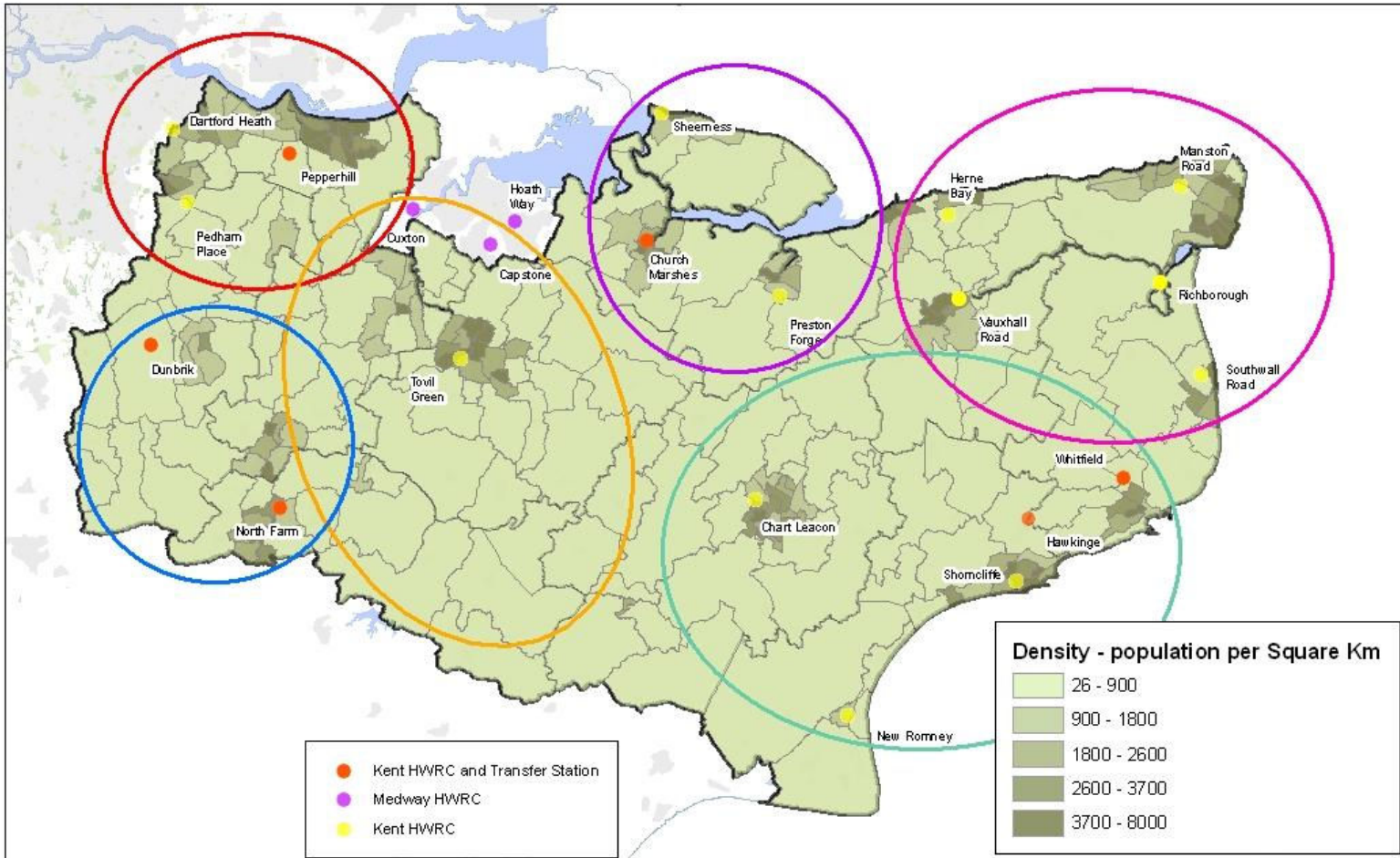
- 5.5 In order to plan effectively it is important to consider the network as a whole rather than prioritise opportunistic advances. It is also necessary to take account of growth and regeneration, the significant improvements in the highway network in Kent over the past 30 years, and the extent to which existing facilities meet current demands and standards. In particular, irrespective of the standard of the actual sites, the IMG noted serious access issues at several facilities such as Church Marshes, Sittingbourne.
- 5.6 With this in mind, the existing network of 19 sites has been divided into 6 zones or clusters. The IMG considered that this approach should provide the blueprint for future network delivery.

These clusters are:

1. SE Kent: Dover, New Romney, Shornecliffe, Hawkinge & Ashford
2. NE Kent: Canterbury, Herne Bay, Margate, Deal and Richborough
3. Swale: Sheerness, Sittingbourne and Faversham
4. NW Kent: Pepperhill, Dartford Heath and Swanley,
5. Mid Kent Tovil (Cuxton),
6. W Kent: Sevenoaks and Tunbridge Wells

There are proposals for clusters 1-5, but no proposal for (6) W Kent as these two waste transfer station and household waste recycling centre sites will be reviewed ahead of their existing management contract terms.

Population Density and HWRC zones



## **6. Household Waste Recycling Centres: Future network provision**

This section identifies potential scope for optimisation of the network within the clusters. The consultation first included general questions regarding usage and options for change with the following responses.

- 85% of the respondents rate the current service as good or excellent.
- 40% of respondents visit the HWRCs a few times a year, 10% visit weekly, 22% visit 2-3 times a month and 24% visit monthly.
- 91% of respondents have a journey time of less than 20 minutes to their nearest HWRC.
- 71% of respondents believe that a reasonable drive time to a HWRC is between 10 and 20 minutes.

Specific questions and responses are set out below.

### **Thinking of the Council's aim to continuously improve sites, do you believe that the HWRCs are generally fit for purpose?**

90% agree, 5% disagree and 5% answered don't know

The three most common comments were:

- HWRC too small and poorly designed
- Negative experience of queues
- Need to increase materials streams

### **Would you support an overall reduction of one or two sites across Kent, provided the service continued to be operated to a good standard across the remainder of the HWRCs?**

55% agreed, 30% disagree and 15% answered don't know

### **To help shape the future of the network of HWRCs, please tell us which are the three most important things for you?**

The top most important factors were the range of materials, short journey times and reduced queues.

### **If you do not use a Kent HWRC, are there any improvements that would encourage you to? (Note – some respondents answered this question although they do use the HWRCs already)**

The top 3 reasons were stated as:

- Local facilities – want a site close to home
- Extend range of materials accepted
- Improve accessibility, no steps to containers.

Turning to the clusters identified in section 5.6 above, each one is considered separately below.

## **SE Kent**

### **Dover, New Romney, Shornecliffe, Hawkinge and Ashford**

#### **POSC Report**

The plans for a new transfer station at Ashford provide an opportunity to improve access and upgrade the HWRC substantially. The accepted business case includes the associated closure of the legacy transfer station and HWRC at Hawkinge, which is located at the site of an obsolete incinerator. The Hawkinge site is set to close when the Ashford facility comes on stream in 2013. It is considered that the remaining sites in the zone meet current needs and standards. However in the long-term, consideration may need to be given to the need for expansion or relocation of the Shornecliffe (Folkestone) HWRC which has limited capacity to meet any increase in demand.

#### **Consultation response summary:**

**Taking into account proposals to improve the facility at Ashford, do you believe it is reasonable to close the out of date and expensive to operate site at Hawkinge, provided services exist within a 20 minute drive time of your home?**

36% agreed, 18% disagreed, 46% answered don't know

The three most common comments were:

- Other HWRCs are too far to travel
- Improve Hawkinge HWRC
- Increased fly-tipping

204 people from the Hawkinge area responded that the HWRC should not be closed.

The most commonly stated reasons were:

- Increased journey times
- Fly-tipping increase
- Hawkinge is a growing town and needs its own HWRC

Some respondents commented that the question was loaded and/or misleading.

#### **Petition**

A petition of 587 signatures was presented by Hawkinge Town Council to the Cabinet Member on 22 February 2012 strongly opposing any proposal to close the household waste recycling centre at Hawkinge.

**Do you support the upgrading of the existing HWRC at Ashford, which forms part of the proposal for a new waste transfer station?**

50% agree, 4% disagree and 46% answered don't know  
Of those respondents who use the Ashford HWRC 88% support upgrading.

#### Revised recommendations taking account of consultation and EIA:

It is proposed to close Hawkinge HWRC and waste transfer station in late 2013 as part of the proposal to provide a new waste transfer station at Ashford. This takes account of the site having the lowest waste arisings of any site in the county, the nature of the legacy site which opens on weekdays and on a Saturday morning only for historic reasons, the ongoing cost of maintaining the obsolete incinerator building and the availability of both Shornecliffe, Folkestone and Whitfield, Dover HWRCs within a 20 minutes drive time.

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#### **NE Kent** **Canterbury, Herne Bay, Margate, Deal & Richborough**

##### POSC Report

This zone has sites in close proximity, each serving discrete populations (with the exception of Richborough HWRC, where the hinterland for the site overlaps with that of Margate HWRC). The Richborough site has limited space and would need significant investment for expansion and upgrading to modern standards. Therefore, Richborough HWRC has been identified for closure in summer 2013, when the current management contract expires. The nearest alternative site is at Margate, which was subject to major re-development and expansion in 2006. It has available capacity to meet any resultant increased demand, and mapping analysis shows the impact on householders' drive times would be minimal.

Of the other three sites, Canterbury HWRC is a modern fit for purpose site serving a large urban community; Herne Bay HWRC is scheduled for major re-development to current standards in 2012; and Deal HWRC (although relatively small) provides a full range of services and serves a distinct local community.

##### Consultation response summary:

**Taking into account that there is a facility at Deal and Margate, do you believe it is reasonable to close the out of date and expensive to operate facility at Richborough, provided services exist within a 20 minute drive time of your home?**

41% agree, 17% disagree and 42% answered don't know.

The three most common comments were:

- Other HWRCs are too far to travel
- The roads do not make other HWRCs easily accessible.
- The HWRC is always busy and should not be closed

177 people from the Richborough area responded that the HWRC should not be closed.

The most commonly stated reasons were:

- Journey times will increase
- Increase in fly-tipping
- The site should be updated / improved

## **E-petition**

An e-petition commenced on 14 February 2012, petitioning the Council “to decide to keep the household waste recycling centre at Richborough” on the stated basis that it is a well-run site, used by local residents, any closure will increase pressure on other sites and increase fly-tipping.

### Revised recommendations taking account of consultation and EIA:

It is proposed to close Richborough HWRC in 2013 (when the current management contract expires) due to its low waste tonnage throughput, the poor quality of the site which would otherwise require significant capital investment, and the low number of households which would be affected by drive times to the next nearest site.

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## **Swale**

### **Sheerness, Church Marshes and Faversham**

#### POSC Report

The three sites in this area were developed in the 1980s and have had little further capital investment. They are arguably no longer fit for purpose, being too small to be capable of significant improvement. The existing capital programme already makes provision to replace the Church Marshes transfer station and HWRC. It is important to consider the context of the recent highway investment to Sheerness, the new Sittingbourne Northern Relief Road currently under construction, and proposals for regeneration in the area by Swale Borough Council. With these points in mind, once the Church Marshes relocation site is confirmed it will be possible to consider any scope for consolidation in this zone.

#### Consultation response summary:

**Do you agree that the HWRC at Church Marshes, Sittingbourne, is inadequate and should be replaced with a new facility at a more accessible location, to provide a more efficient service to Swale residents?**

24% agree, 4% disagree and 72% answered don't know.

Of the respondents who use Church Marshes 40% believe it should be replaced. The most common comments from those who disagree with replacement were:

- Happy with Church Marshes as it is

- This will result in the closure of Faversham or Sheerness sites
- Not enough information on new location

#### Revised recommendations taking account of consultation and EIA:

It is proposed that a site search be carried out to find a replacement site for Church Marshes TS/HWRC. Subject to the location of the replacement site, it is proposed site provision in the area be reviewed and consult on any further changes which are indicated.

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### **West Kent** **Pepperhill, Dartford Heath and Swanley,**

#### POSC report

Pepperhill transfer station and HWRC opened in 2008 has been subject to major investment. It is subject to a long term management contract. It is one of the busiest sites in the Kent HWRC network. Of the other two sites, Dartford Heath is on land which is leased and therefore produces an additional revenue pressure. However, based on tonnage throughput and operating cost, these two smaller sites, Dartford Heath and Swanley, are considered to be cost-effective. As a result the time to consider the future of these two sites is at the lease expiry in 2017.

#### Consultation response summary:

**The HWRCs at Dartford Heath and Swanley currently operate at full capacity with no scope for expansion. Do you agree they should be replaced with modern facilities?**

50% agree, 6% disagree and 44% answered don't know  
Of the respondents who use Dartford Heath and Swanley HWRCs, 47% believe they should be replaced with modern facilities.

The three main reasons why people disagreed were:

- The sites are fine as they are
- Risk of reducing from two sites to one
- Insufficient information

#### Revised recommendations taking account of consultation and EIA:

It is proposed a site search be carried out in this area, with a view to replacement facilities being provided in 2017, and subject to a further decision. A provision of £2.6m has already been made in the waste capital programme.

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### **Mid-Kent** **Tovil (Cuxton)**

#### POSC Report

Tovil HWRC is recognised as an over-subscribed site. It serves the whole of the Maidstone urban area, the West Malling / Larkfield / Ditton corridor, and a large proportion of the rural area to the south reaching to the county boundary at Hawkhurst. There is a clear need for an additional site to reduce the pressure at Tovil and equally seek to provide a service for Tonbridge and Malling Borough Council area residents.

Additionally, KCC pays Medway for KCC householders' use of the Medway Cuxton site. This funding of £300k per year would be better used to support a new facility in Kent. The capital programme previously made provision for this project but the funding was removed due to the problems finding a suitable site. It is proposed that the site search be renewed and new capital funding sought for development in 2015/16, subject to the pressure on the capital programme.

#### Consultation response summary:

**Do you support the provision of an additional HWRC in the Tonbridge and Malling area, which is currently not covered by the existing network?**

52% agree, 3% disagree, 45% answered don't know

Stakeholder comments included:

- Support for an HWRC in the area
- Improve existing access before building new ones
- Overcrowding at sites e.g. Tovil

#### Revised recommendations taking account of consultation and EIA:

Despite previous unsuccessful site searches it is proposed to continue to seek to provide a new site to serve Tonbridge and Malling and Maidstone residents which will assist in reducing queues to the Tovil HWRC. Provision of £2.3m has been included in the capital programme.

## **7. Operational risk management**

### **7.1 Fly-tipping**

7.1.1 Fly-tipping has been identified as a risk consequent to both operational changes and site closures. However, the vast majority of Kent residents are law abiding and keen to recycle and dispose of their waste appropriately. When individual household waste recycling centres have been closed for refurbishment in the past there has been no evidence of increased fly-tipping. For instance the Pepperhill site, one of the busiest in the county, was closed for 6 months in 2008 without any adverse impact in this respect. Additionally, in other local authority areas where radical changes have been made which far exceed those proposed in this report, any temporary increase in fly-tipping has been short-lived.

7.1.2 However, it is recognised that there is a minority of people who commit criminal offences. The Council, working with the waste collection authorities, has a very good track record of successful prosecutions utilising covert

surveillance to secure significant fines including custodial sentencing. The maximum penalty of 5 years in prison and fines of up to £50,000 is well established. The team also pursues cases of fraud where waste entering the HWRCs is misrepresented as household waste. It works regionally with London boroughs, the Environment Agency and the waste collection authorities to share intelligence.

7.1.3 It is proposed to launch a new campaign to increase vigilance and emphasise a zero-tolerance approach to fly-tipping across the county which coincides with the proposed operational changes. The campaign will aim to maximise the deterrent impact of criminal prosecutions across Kent.

7.1.4 In respect of managing the risk of fly-tipping, it is important to ensure that the commercial and industrial (C&I) waste sector is provided with information on their current disposal options as part of the customer engagement plan highlighted below. Additionally, the Minerals and Waste Development Framework is making provision for all commercial and industrial waste arisings in the County. A network of suitable sites is currently being identified as part of the site assessment process. The preferred options for new sites will be consulted on in a consultation commencing at the end of May 2012. In addition KCC will be safeguarding the existing major facilities for commercial and industrial waste in the Core Strategy in order to maintain capacity for the planned period to 2030.

## 7.2 Customer Engagement Plan

7.2.1 The need for a comprehensive customer engagement plan ahead of the implementation of any agreed operational changes was noted by the IMG/POSC as essential. Attention is particularly drawn to a recurring point in the Equalities Impact Assessment which is the need for appropriate communications, for instance in relation to the protected characteristics of age, disability, race, and pregnancy & maternity.

7.2.2 There will need to be a planned implementation programme so that information can be provided during the lead-in period. A phased approach will be taken to manage the transition, with good communications to raise public awareness of changes in the way sites are operated.

## 8. Financial considerations

8.1 The proposed operational and infrastructure changes will deliver efficiencies and are consistent with the medium term financial plan. Additional funding has already been provided within the capital programme for waste management infrastructure.

## 9. Recommendations

9.1 It is recommended that Cabinet agree that the following operational policy changes are made at the household waste recycling centres.

- a) Tyres, asbestos and gas bottles are to be accepted by KCC's network of waste transfer stations only, and the quantity limited as follows.

Tyres: Limit car tyres to a maximum of two, per visit.  
Asbestos: Limited to one sack or equivalent, per visit.  
Gas bottles: Limited to one "refillable" gas bottle, per visit.

A standard charge of £5 per unit (i.e. up to 2 tyres or one bag of asbestos or one gas bottle) is proposed, to be increased in line with future increases in disposal costs and administration.

- b) The amount of construction waste to be brought into a HWRC by any single vehicle, or combined vehicle and trailer, is to be set at a maximum of one car boot load of construction waste. This would be equivalent to 3 bags, of up to 30kg weight per bag, this being a bag weight that the average person can lift. The waste is to comprise spoil, hardcore, soil, rubble, or equivalent. For larger items such as baths, the material would not need to be bagged, but should not exceed approx. 90kg in total or one average car boot load per visit.
- c) All commercial vehicles including pick-up trucks, vans, agricultural vehicles including horse boxes are to be excluded from HWRCs.

An exception scheme for householders with disabilities using over-height vehicles is to be introduced.

A permit scheme for the small number of householders who do not own any other vehicle, other than an excluded vehicle, and those with large private vehicles is provided. All other conditions, such as the limit on construction waste, will continue to apply. Permits will provide access to the sites on up to 12 occasions per calendar year. Any additional applications for permits in one year from the same household will be subject to investigation to ensure the exclusion of trade waste.

- d) Access to HWRCs for trailers is limited to those of up to 1.0m<sup>3</sup> capacity. The total combined quantity of construction waste is to be limited as set out above. (The quantity is not to be doubled for a combined vehicle and trailer.)
- e) Support the development of additional commercial capacity where there is evidence of under-provision of waste disposal for businesses. Carry out a feasibility study on the opportunities at Kent County Council waste sites to promote cost-effective waste disposal capacity for businesses in order to ensure there are alternatives to fly-tipping.
- f) Provide close monitoring of fly-tipping across Kent to identify any hot-spots arising from the implementation of operational policy or network changes. Ensure prompt action and support to investigate offences and arrange for the removal of waste by working with the waste collection authorities. Launch a new media campaign based on zero-tolerance of fly-tipping and promoting responsible waste disposal.
- g) A comprehensive communications plan and information programme to be provided to support implementation of the operational changes.

- h) The existing permit scheme at Dartford Heath HWRC for Kent only residents is retained. A similar trial permit scheme is considered in 2013/14, at Swanley HWRC.

It is further recommended that the Corporate Director for Enterprise and Environment to implement the decision in respect of policy changes through a phased approach to ensure sufficient capacity to manage a smooth transition and to keep progress under continuous review to maximise customer service.

9.2 It is further recommended that the following changes are introduced in respect of the HWRC sites network:-

- i) Carry out a site search in respect of the North West Kent and Mid Kent areas.
- j) Close Richborough waste site in autumn 2013 at the end of the current contract term and Hawkinge waste site in autumn 2013 when the new Ashford Transfer station and improved household waste recycling centre is fully operational.
- k) Review the HWRC provision in the Swale area subject to a further member decision when the replacement site for Church Marshes TS/HWRC is established.

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## 10. Background documents:

Public Consultation Report – Household Waste Recycling Centres (February 2012)  
Equalities Impact Assessments (May 2011 – February 2012)

## 11. Author contact details

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# Kent County Council Waste Management

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## HOUSEHOLD WASTE RECYCLING CENTRES

### PUBLIC CONSULTATION REPORT

**April 2012**

To be published online at:

[www.kent.gov.uk/hwrcconsultation](http://www.kent.gov.uk/hwrcconsultation)



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## EXECUTIVE SUMMARY

### **Public Consultation:**

A ten week public consultation on proposed changes to the Household Waste Recycling Centre service in Kent was run from 1<sup>st</sup> December 2011 to 9<sup>th</sup> February 2012.

A full Equalities Impact Assessment (EIA) was conducted prior to the development and delivery of the public consultation and reviewed once the consultation had been completed.

The EIA shaped the engagement and participation mechanisms, identifying protected characteristics which had the potential to be negatively or positively impacted by the proposed policies, as well as ensuring that particular attention was paid to engagement with minority groups in Kent.

The consultation consisted of a questionnaire, available in both electronic and paper formats. Kent residents were invited to respond to the consultation using various communication methods, developed following Mosaic analysis, to ensure a broad range of target audiences were engaged with in a proportionate manner.

The communication methods used included:

- Direct Mail
- Press advertisements
- Gateways
- Libraries
- KCC website
- Engagement at HWRCs
- Posters in sports clubs/ societies
- KCC community engagement officers
- Key stakeholders
- Member briefing

Information was also sent to over 150 equalities groups across the county to inform them of the consultation and for wider circulation to members of their groups / communities.

A total of 3,499 consultation responses were received, consisting of:

- 1,400 customer paper questionnaire responses;
- 2,056 customer online responses; and

- 43 stakeholder responses - received from district councils, parish councils, waste management contractors and other agencies.

Table 1 on the following page provides a summary of all responses received, aligned to each of the questions related to proposed operational and infrastructure changes asked within the consultation.

**Decision:**

Following the public consultation, recommendations were presented to Cabinet on 19<sup>th</sup> March 2012 for consideration which took into account the feedback obtained from the public consultation and the full EIA. You can view the [Cabinet paper](#).

Cabinet endorsed all recommendations and delegated the final decision to the Cabinet Member for Environment, Highways and Waste.

A petition was received in respect of the proposal to close the Richborough HWRC. This was debated at the meeting of the County Council on Thursday 29<sup>th</sup> March 2012.

The Cabinet Member made his decision on 3<sup>rd</sup> April 2012 and a full copy of this can be found on our [website](#).

Operational policy changes at HWRCs will be implemented during the summer of 2012, with extensive engagement to inform and support customers.

Table 1: Summary of all public consultation responses received

CONSULTATION QUESTION	OVERARCHING CUSTOMER RESPONSE	OVERARCHING STAKEHOLDER RESPONSE
<p><b>PROPOSED OPERATIONAL POLICY CHANGES</b></p> <p><b>Q7.</b> Do you consider that items such as tyres, asbestos and gas bottles, which are mainly commercial waste, should be excluded from Household Waste Recycling Centres, provided other disposal routes are available?</p>	<ul style="list-style-type: none"> <li>60% of respondents agreed that items such as tyres, asbestos and gas bottles, which are mainly commercial waste, should be excluded from HWRCs.</li> <li>32% responded 'no'.</li> <li>Comments included: <ul style="list-style-type: none"> <li>Potential flytipping of materials</li> <li>A perception that these materials are generated by householders and they have a need for HWRCs to accept them</li> <li>Customers want a 1-stop shop for all materials and convenience of service</li> <li>Lack of information about alternative disposal points</li> <li>Risk of hazardous waste being disposed of inappropriately</li> <li>Increased cost to councils for removal of flytipping</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1 tyre / bottle per visit for free</li> <li>Charge for these materials if it means the facilities are HWRCs can remain</li> <li>Increase in flytipping would result</li> <li>Where would householders take these items? Alternative disposal points need to be well promoted</li> <li>Section 51 EPA – legal duty to accept materials for disposal</li> <li>Financial impact upon householder for cost of disposal</li> <li>Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse</li> <li>It is reasonable to expect these items to come from the householder</li> <li>Policy is not in line with Vision for Kent or Kent Environment Strategy</li> <li>Policy ignores inherent value in waste that could be gained by trading waste disposal</li> <li>Hazardous nature of materials – environmental risks and costs associated with fly tipping materials</li> <li>Impact assessment required</li> <li>Gas cylinders are likely to be empty upon disposal</li> <li>Gas bottles can be taken back and exchanged, therefore, no need to accept them</li> </ul>
<p><b>Q8.</b> Would you support the exclusion of trade waste e.g. by ceasing to open the height barrier and excluding trade vehicles, which the Household Waste Recycling Centres have no duty to accept and costs the Council money?</p>	<ul style="list-style-type: none"> <li>67% of respondents would support the exclusion of trade waste e.g. by ceasing to open the height barrier and excluding trade vehicles. 25% of respondents would not.</li> <li>Risks identified included: <ul style="list-style-type: none"> <li>Potentially increased flytipping</li> <li>What about householders who hire vans to transport household waste or who only have use of a van?</li> <li>Instead, allow HWRCs to accept all waste from anyone - to save cost of flytipping removal and gain income from materials</li> <li>Council should encourage all waste to be disposed / recycled responsibly</li> <li>Implement charging scheme for traders at HWRCs instead?</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Prevent legitimate customers from entering the HWRCs e.g. van hire by householders</li> <li>Do not support determining legitimate disposal by vehicle type preferred by residents</li> <li>Clear and accessible communication will be needed to residents</li> <li>Should explore potential for income from trade waste</li> <li>Increase in fly tipping and cost to district councils</li> <li>Open height barrier at weekend only</li> <li>High level of 4x4 vehicles in Sevenoaks area – will not be able to access site</li> <li>1 district and 3 parish councils support proposal</li> <li>Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse</li> <li>Support the policy if this limits waste from non-domestic sources</li> <li>Restricts ability of residents to move large waste items around for disposal easily</li> <li>Policy does not support recycling behaviours</li> <li>The type of vehicle should be irrelevant, access should be determined by source of waste</li> <li>Suggest access for single axle domestic trailers</li> <li>Domestic vehicles should be permitted</li> </ul>
<p><b>Q9.</b> Would you support the exclusion of construction waste, which the Household Waste Recycling Centres have no duty to accept and costs the Council money?</p>	<ul style="list-style-type: none"> <li>65% of respondents would support the exclusion of construction waste at HWRCs.</li> <li>26% of respondents would not.</li> <li>Comments included: <ul style="list-style-type: none"> <li>Potential increase in flytipping</li> <li>Concern over penalising the DIYer, should be a provision to dispose of</li> <li>Charge for ALL construction waste regardless of its source?</li> <li>Lack of information about alternative disposal points</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Confusion over what is meant by 'construction waste' – municipal or commercial?</li> <li>Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse</li> <li>Restriction on quantity will increase journeys made by householders – increase carbon emissions</li> <li>Policy is not in line with Vision for Kent or Kent Environment Strategy</li> <li>The quantity limit is too low</li> <li>Loss of valuable commodity</li> <li>Need for robust enforcement strategy and costly to enforce at HWRCs</li> </ul>
<p><b>Q10.</b> Do you believe that councils should increase income by maximising the diversion of household waste for recycling?</p> <p><b>Q11.</b> Do you believe it is reasonable for householders who do not live in Kent, and therefore do not contribute to the funding of sites, to be excluded from using Kent's Household Waste Recycling Centres?</p>	<ul style="list-style-type: none"> <li>90% of respondents believe that councils should increase income by maximising the diversion of household waste for recycling.</li> <li>59% of respondents believe it is reasonable for householders who do not live in Kent to be excluded from using Kent's Household Waste Recycling Centres.</li> <li>34% of respondents do not believe it would be reasonable.</li> <li>Comments included: <ul style="list-style-type: none"> <li>Risks were identified including: <ul style="list-style-type: none"> <li>Reciprocal arrangement with neighbouring councils is required; balance across border; petty proposal</li> <li>Increase in flytipping</li> <li>Convenience to use nearest HWRC regardless of borders</li> <li>Environmental impact from increased distance to sites</li> <li>Should be encouraging recycling not deterring</li> <li>Boundaries shouldn't matter to customer services</li> </ul> </li> </ul> </li> <li>8% of respondents use HWRCs in other areas.</li> <li>Of those that do use HWRCs in other areas, 57% use Medway sites.</li> </ul>	<ul style="list-style-type: none"> <li>This is as long as it is short</li> <li>Does this include the relationship with Medway</li> <li>Negative impact on residents purse – funding of longer journeys</li> <li>Does not encourage recycling</li> <li>Duty to co-operate with neighbouring councils</li> <li>Difficult to police the policy</li> <li>Costly to introduce the policy</li> <li>Greater carbon impact from increased journey times</li> </ul>
<p><b>Q12.</b> Do you use Household Waste Recycling Centres in other areas?</p>	<ul style="list-style-type: none"> <li>8% of respondents use HWRCs in other areas.</li> <li>Of those that do use HWRCs in other areas, 57% use Medway sites.</li> </ul>	

CONSULTATION QUESTION		OVERARCHING CUSTOMER RESPONSE	OVERARCHING STAKEHOLDER RESPONSE
<b>PROPOSED INFRASTRUCTURE CHANGES</b>			
<p><b>Q13.</b> Thinking of the Council's aim to continuously improve sites, do you believe that the Household Waste Recycling Centres are generally fit for purpose?</p>	<ul style="list-style-type: none"> <li>90% of respondents believe that the HWRCs are generally fit for purpose.</li> </ul> <p>Key criticisms of the centres included:</p> <ul style="list-style-type: none"> <li>HWRC too small and poorly designed</li> <li>Negative experience of queues to access HWRC and congestion</li> <li>Need to increase material streams</li> <li>Site staff – unhelpful and too many</li> </ul>		
<p><b>Q14.</b> To help shape the future network of Household Waste Recycling Centres, please tell us which of the following are the three most important to you.</p>	<ul style="list-style-type: none"> <li>Most respondents identified the range of materials accepted on site as one of the most important factors of HWRCs.</li> <li>Short journey times, short queues at the site, helpfulness of site staff and ease of access around the site as important.</li> <li>Many respondents specified a desire for a reuse facility on site and longer opening hours.</li> </ul>		
<p><b>Q15.</b> Would you support an overall reduction in one or two sites across Kent, provided the service continued to be operated to a good standard across the remainder of Household Waste Recycling Centres?</p>	<ul style="list-style-type: none"> <li>30% of respondents would support an overall reduction in one or two sites across Kent, provided the service continued to be operated to a good standard across the remainder of HWRCs.</li> <li>55% of respondents would not support an overall reduction.</li> </ul> <p>Comments included:</p> <ul style="list-style-type: none"> <li>Increase in flytipping</li> <li>Convenience to use nearest HWRC regardless of borders</li> <li>Increased travel time / cost.</li> <li>Environmental impact from increased distance to sites</li> <li>Should be encouraging recycling not deterring</li> <li>Boundaries shouldn't matter to customer services</li> </ul>		<ul style="list-style-type: none"> <li>Ensure sufficient capacity at sites – footfall and tonnages</li> <li>Reducing number of HWRCs is not conducive to reducing waste to landfill</li> <li>A 20 minute drive time guideline is supported</li> </ul>
<p><b>Q16.</b> Taking into account proposals to improve the facility at Ashford, do you believe it is reasonable to close the out of date and expensive to operate site at Hawkinge, provided services exist within a 20 minute drive time of your home?</p>	<ul style="list-style-type: none"> <li>36% of all respondents believed it is reasonable to close the site at Hawkinge.</li> <li>46% of respondents answered they 'did not know' – after excluding these responses, 67% of the remaining respondents believed it is reasonable to close the site at Hawkinge.</li> <li>Further analysis reveals that of those respondents that use Hawkinge HWRC, 92% believe it should not be closed.</li> </ul> <p>The main reasons that people answered 'no' to closing Hawkinge HWRC are:</p> <ul style="list-style-type: none"> <li>Journey times will be increased</li> <li>Hawkinge should be improved/ updated</li> <li>Increase in flytipping</li> <li>Increase in fuel cost to residents and pollution from increased journeys</li> <li>Hawkinge is a growing town/ area and needs it's own HWRC</li> <li>Some respondents state that the question is loaded and misleading</li> <li>Some state that Ashford HWRC is more than 20 minutes away/ too far to travel to</li> </ul>		<ul style="list-style-type: none"> <li>Shepway DC support – provided no additional cost is incurred by the district, but does ask KCC to seriously consider</li> <li>Closure not supported by local parish and town councils</li> <li>Increase in travel time and associated journey cost and emissions; risk of flytipping</li> <li>Support reduced number of materials accepted to reduce operating costs</li> <li>Misleading question and unsubstantiated statement – "out of date and expensive to operate"</li> <li>Ambiguous question – transfer station or HWRC for closure?</li> <li>Concerns about impact on Whitfield and Folkestone HWRCs</li> </ul>
<p><b>Q17.</b> Taking into account that there is a facility at Deal and at Margate, do you believe it is reasonable to close the out of date and expensive to operate site at Richborough, provided services exist within a 20 minute drive time of your home?</p>	<ul style="list-style-type: none"> <li>41% of all respondents believed it is reasonable to close the site at Richborough.</li> <li>42% of respondents answered they 'did not know' – after excluding these responses, 72% of the remaining respondents believed it is reasonable to close the site at Richborough.</li> <li>Further analysis reveals that of those respondents that use Richborough HWRC, 80% believe it should not be closed.</li> </ul> <p>The main reasons that people answered 'no' to closing Richborough HWRC are:</p> <ul style="list-style-type: none"> <li>Journey times will be increased – 20 minutes is too far</li> <li>The road infrastructure does not make the alternative HWRCs easily accessible</li> <li>Increase in flytipping</li> <li>The HWRC is always busy and shouldn't be closed</li> <li>A few respondents commented that Richborough HWRC should stay because the Thanet Waste is being expanded.</li> </ul>		<ul style="list-style-type: none"> <li>Additional journey time for residents to alternative HWRCs</li> <li>Adverse traffic impacts on local road network around Deal and Whitfield – review and advantage taken of Section 106 Town and Country Planning Act 1990 for highway improvements</li> <li>Several responses do not support the closure</li> <li>Deal Transport and Flood Alleviation Study – infrastructure assessment</li> <li>Margate HWRC necessitates a longer walk with heavy items</li> <li>Please consider older people who would have further to drive</li> <li>Increase in flytipping</li> <li>How is the site out of data?</li> <li>Location provides a service to southern half of the Thanet district</li> </ul>
<p><b>Q18.</b> The Household Waste Recycling Centres at Dartford Heath and Swanley currently operate at full capacity with no scope for expansion. Do you agree they should be replaced with modern facilities?</p>	<ul style="list-style-type: none"> <li>50% of respondents believe that the Household Waste Recycling Centres at Dartford Heath and Swanley should be replaced with modern facilities.</li> <li>Further analysis reveals that of those respondents that use Dartford Heath and Swanley HWRC, 47% believe they should be replaced with modern facilities.</li> </ul>		<ul style="list-style-type: none"> <li>Dartford Borough Council supported this proposal.</li> </ul>

CONSULTATION QUESTION	OVERARCHING CUSTOMER RESPONSE	OVERARCHING STAKEHOLDER RESPONSE
	<p>The main reasons that people answered 'no' to replacing Dartford Heath and Swanley with more modern facilities are:</p> <ul style="list-style-type: none"> <li>• Respondents believe that the sites are fine as they are</li> <li>• Respondents are concerned that updating them would mean moving them to one site rather than two separate sites</li> <li>• Some respondents feel that there is not enough information provided to make judgement e.g. what is meant by 'modern facilities'?</li> <li>• Dartford Borough Council supported this proposal.</li> </ul>	
<p><b>Q19.</b> Do you agree that the Household Waste Recycling Centre at Church Marshes, Sittingbourne, is inadequate and should be replaced with a new facility at a more accessible location, to provide a more efficient service to Swale residents?</p>	<ul style="list-style-type: none"> <li>• 24% of respondents believe that the HWRC at Church Marshes should be replaced with a new facility in a more accessible location.</li> <li>• Further analysis reveals that of those respondents that use Church Marshes HWRC, just 40% believe it should be replaced with a new facility.</li> </ul> <p>Comments included:</p> <ul style="list-style-type: none"> <li>• Respondents are happy with Church Marshes as it is</li> <li>• Many respondents are concerned that this will result in the closure of Sheerness/Faversham HWRC</li> <li>• Some respondents feel there is not enough information provided on where the new site would be</li> </ul>	<ul style="list-style-type: none"> <li>• Maidstone BC support relocation of HWRC and Transfer station to reduce congestion and access are improved</li> <li>• May deter flytipping</li> <li>• Would reduce vehicle emissions</li> <li>• Care to identify location which doesn't impact environmentally sensitive land</li> </ul>
<p><b>Q20.</b> Do you support the provision of an additional Household Waste Recycling Centre in the Tonbridge and Malling area, which is currently not covered by the existing network?</p>	<ul style="list-style-type: none"> <li>• 52% of respondents support the provision of an additional HWRC in the Tonbridge and Malling area.</li> </ul>	<ul style="list-style-type: none"> <li>• Widespread from organisations for a HWRC in the area</li> <li>• Improving access to existing sites should be considered before building new HWRCs</li> <li>• Recognised over-crowding at some existing sites e.g. Tovil</li> <li>• High level of illegal waste sites in mid Kent</li> <li>• EA support for HWRC development in Staplehurst / Headcorn area</li> <li>• "Additional sites should be considered on journey time and not differentiated by district boundaries"</li> <li>• "It is no coincidence that the mid Kent area, where there is no HWRC, has the highest number of illegal waste sites"</li> </ul>
<p><b>Q21.</b> Do you support the upgrading of the existing Household Waste Recycling Centre at Ashford, which forms part of the proposal for a new waste transfer station (which bulks household waste for haulage to processors)?</p>	<ul style="list-style-type: none"> <li>• 50% of respondents would support an upgrading of the existing HWRC at Ashford.</li> <li>• Further analysis reveals that of those respondents that use Ashford HWRC, 88% support the upgrading of the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders demonstrated support for upgrading of HWRC and provision of new transfer station</li> </ul>
<p><b>Q22.</b> If you do not use a Kent Household Waste Recycling Centre, are there any improvements that would encourage you to?</p>	<p>The main suggested improvements include:</p> <ul style="list-style-type: none"> <li>• Many want on-site shops to buy things that are still in good condition</li> <li>• Many want to be able to recycle more things ESPECIALLY PLASTICS</li> <li>• A facility closer to home/ more sites</li> <li>• Allow over height vehicles</li> <li>• More helpful staff</li> <li>• More help with carrying heavy items</li> <li>• Better/ more parking on site</li> <li>• Mobile collections from home for elderly and people without a car</li> <li>• Increase the opening hours</li> <li>• Improve the ease of access</li> <li>• No steps</li> </ul> <p>Many commented that there wasn't the opportunity in the questionnaire to suggest improvements for those that already use the HWRCs</p>	

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## **1. INTRODUCTION: DECISION MAKING PROCESS**

An Informal Members Group was established in April 2011 with the purpose of undertaking a review of Household Waste Recycling Centre (HWRC) provision in Kent to identify the right level of HWRC service for Kent residents at the right cost.

Terms of reference for the Informal Members Group (IMG) were agreed by the Policy Overview and Scrutiny Committee (POSC) for Environment, Highways and Waste at its meeting on 8<sup>th</sup> April 2011.

The IMG met 3 times, plus a tour on 27 July of some of the Household Waste Recycling Centres. In particular, the tour took account of the extent of perceived trade waste entering Household Waste Recycling Centres and the existing network infrastructure.

The review produced a report outlining the issues and giving a series of recommendations on how the HWRC service could change to deliver the optimum service for the customer and financially. The report from the IMG was considered by the POSC for Environment, Highways and Waste on 27<sup>th</sup> September 2011 prior to the proposed policies being presented to the Cabinet Member for Environment Highways and Waste. An Equality Impact Assessment was conducted to accompany the proposals.

These proposals were subject to a ten week public consultation from 1<sup>st</sup> December 2011 to 9<sup>th</sup> February 2012. The responses were reviewed to inform a further Equality Impact Assessment.

This report presents the responses received to the public consultation and was presented to Cabinet by Bryan Sweetland, Cabinet Member for Environment Highways and Waste, on 19<sup>th</sup> March 2012. This report also outlines the ultimate decision made by the Cabinet Member.

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## **2. BACKGROUND**

### **2.1 CURRENT SERVICE PROVISION**

Kent County Council is the statutory Waste Disposal Authority (WDA) for the county. There has been a duty on the WDA to provide Household Waste Recycling Centres (HWRCs) originally going back as far as the Civic Amenity Act 1967. The duty is now embodied within section 51 of the Environmental Protection Act 1990. In summary, the act states that HWRCs must be provided free of charge and open over part of a weekend. The Act also includes a power to charge for waste other than household waste at Household Waste Recycling Centres.

As a result of this duty and associated powers, the household waste network has evolved over many years to its current level of network infrastructure provision, operating policy, and management arrangements.

There are currently 19 HWRCs provided across Kent, largely located close to each significant urban area in Kent. In most cases there is one HWRC per district area, some districts (Sevenoaks, Canterbury, Thanet, and Dover) have two, and in two cases (Swale and Shepway) each have three HWRCs. Tonbridge & Malling BC has no HWRC within its administrative area, but as a significant number of TMBC residents use Medway sites, KCC makes a financial contribution to Medway Council to compensate them for this cross-border activity.

Of these 19 HWRCs, 6 are co-located with waste transfer stations provided by KCC. The function of the transfer stations is to bulk up household waste collected by the waste collection authorities. Only the waste transfer stations have weighbridges and accept trade waste based on charges by tonnage.

The sites' management is out-sourced and managed under contract by external contractors, with the exception of Church Marshes at Sittingbourne and New Romney which are both managed by Kent Commercial Services, part of Kent County Council.

## 2.2 CURRENT OPERATING POLICY

KCC last reviewed its operating policy in January 2009 and the key points of the policy are:

- Providing a height barrier of 2m to prevent access by large vehicles;
- Prohibiting the practice of “walking-in” waste from over-height vehicles parked outside;
- Opening the height barrier for householders only with large vehicles on Wednesdays and Saturdays only at selected larger sites;
- Limiting the size of trailers; and
- Continuing to provide a permit scheme for Kent residents at the Dartford Heath site.

## 2.3 CURRENT OPERATING COSTS

The net cost associated with the operation of the HWRC service is made up of four basic elements:

- i) The cost of operating and maintaining the sites, together with the costs of transporting the various separated materials for disposal or processing elsewhere (the current HWRC “contract costs”);
- ii) The cost of processing of the recyclables or compostable materials received at the sites;
- iii) The cost of disposing of the residual waste unable to be recycled received at the sites;

*Offset in part by:*

- iv) The income received from the sale of those recyclable materials with a positive value.

Even where a recyclable material has no positive value, nowadays it generally costs less to recycle (or compost) than sending it for disposal. Increasing recycling reduces the overall cost of the HWRC service.

In some cases certain defined materials or items must be kept separate for recycling or specialist disposal, because environmental regulations do not permit them to be sent to landfill or incineration e.g. Waste Electrical Items (WEEE), waste oil, plasterboard, tyres, gas bottles. Some of these materials are collected from the sites free of charge by third party contractors - others attract haulage and processing costs.

Currently 26% of all household waste arisings in Kent is received and handled through the HWRC network. The other 74% is largely collected from the kerbside by the 12 district

councils as the waste collection authorities with the remainder collected through recycling bring banks. The County Council has a duty to meet the cost of disposing of this district council collected waste. Further details are provided in table 2 below.

Table 2: 2010/11 waste arisings

<b>KCC's waste arisings</b>	<b>% of waste stream managed</b>	<b>2010/11 arisings (tonnes)</b>
HWRC Managed Waste	26.3%	193,687
Waste Collection Authorities Kerbside Collections	69.8%	513,470
Bring Site	3.2%	23,553
3rd Party Recycling Collections	0.7%	5,252
<b>Total arisings</b>		<b>735,962</b>

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### 3. CONSULTATION PROCESS

The policies proposed in the consultation had the potential to affect every household in Kent. It was therefore important to devise engagement mechanisms to provide the opportunity for participation equally across Kent communities, being mindful of communication preferences and accessibility of information.

The consultation consisted of a [questionnaire](#), available in both electronic and paper formats. Kent residents were made aware of the consultation and invited to respond using various communication methods to ensure a broad range of target audiences were engaged with in a proportionate manner.

The [Equality Impact Assessment](#) shaped the engagement and participation mechanisms, identifying protected characteristics which had the potential to be negatively impacted by the proposed policies, as well as ensuring that particular attention was paid to engagement with minority groups in Kent.

#### 3.1 MOSAIC ANALYSIS

Mosaic, a customer segmentation tool, was used to understand the best way to engage with the residents in Kent. Within Kent, a bespoke Mosaic segmentation has been created using county specific data, whereby every postcode and household in Kent is classified as belonging to one of 69 types and 15 groups. These groups identify clusters of individuals and

households that are as similar as possible to each other, and as different as possible to any other group. Mosaic was used in this instance to understand communication preferences to ensure that residents in Kent were informed about the consultation in a way that they are more likely to be receptive to.

In preparation for the consultation, a sample of postcodes for HWRC users were collated and profiled, to understand the make-up of the current customer base and their communication preferences. The profile of HWRC users was compared with the Mosaic profile of the Kent population as a whole, in order to understand those people more or less likely to use an HWRC user. This supported the development of targeted communication across all Mosaic groups to ensure a representative sample of Kent residents were engaged with.

The following communication approaches were developed and delivered based on Mosaic Analysis:

### **3.1.1. Direct Mail**

Mosaic was used to identify those residents in Kent more likely to be receptive to direct mail as a communication method. In order to determine the content of the direct mail, likely use of the Internet was also established (i.e. promoting a website would be inappropriate if Internet use was low).

As a result, a paper copy of the consultation questionnaire was sent to a random sample of residents belonging to Mosaic groups which were likely to be responsive to direct mail but less likely to have access to the internet. Residents were informed on the covering letter that their address had been selected at random and asked them to encourage others to respond also.

A second direct mail which took the form of a postcard with key points about the consultation and how to participate was sent to a sample of Kent households which were likely to be receptive to direct mail, but also likely to have access to the internet. The postcard signposted residents to the online consultation questionnaire whilst also giving them the option to request a paper copy (or alternative formats) if they preferred.

In light of the questionnaire proposing the closure of Hawkinge and Richborough HWRCs, the direct mail was up-weighted in the areas near these two sites.

### **3.1.2. Sports clubs/ societies**

Mosaic variables were used to understand which sports/ activities specific groups are likely to be interested in. As a result, posters were sent to sports clubs/ societies in Kent in specific areas based on the characteristics of the population in that area. For example, posters were sent to bowls clubs and golf clubs in area in Kent where there is known to be an older population and posters were sent to gyms where the communities are more likely to undertake this kind of activity.

## **3.2 OTHER COMMUNICATION APPROACHES**

### **3.2.1. KCC website**

A dedicated web page ([www.kent.gov.uk/hwrccconsultation](http://www.kent.gov.uk/hwrccconsultation)) was created on the KCC website to provide consultation information and access to the online questionnaire. An email address was also created specifically for any email correspondence ([hwrccconsultation@kent.gov.uk](mailto:hwrccconsultation@kent.gov.uk)) during the consultation period.

### **3.2.2. Gateways**

Each of the 9 Kent Gateways were provided with a supply of postcards, posters and paper copies of the consultation questionnaire, in order to give Kent residents another route with which to obtain a questionnaire should they be Gateway users. Gateways with 'information screens' carried information about the consultation.

### **3.2.3. Libraries**

A poster advertising the consultation along with a number of postcards and paper copies of the questionnaire were provided to each of the 99 KCC Libraries and 11 KCC Mobile Libraries.

### **3.2.4. Engagement at HWRCs**

Whilst it remained important to ensure that those residents that do not currently use the HWRCs are made aware of the consultation, providing information at the sites themselves direct to service users was very important. A sign advertising the consultation was installed at each of the 19 HWRCs on the 1<sup>st</sup> or 2<sup>nd</sup> of December 2011 and displayed for the full 10 weeks.

Furthermore, between 1<sup>st</sup> December and 4<sup>th</sup> December 2011, KCC Waste Management officers successfully handed 5,500 postcards to HWRC customers promoting the consultation across all 19 HWRCs. These were handed out during the weekdays and weekend to ensure that different audiences were engaged with and at the earliest opportunity within the consultation period.

### **3.2.5. Press advertisements**

Mosaic was able to provide an indication of which areas in Kent would be receptive to press advertisements as a communication method. However, it was felt that it would be more reasonable to run county-wide advertising to achieve the greatest reach, equality of access and achieve greatest value for money. In the week commencing 28<sup>th</sup> November 2011, a press advertisement was placed in all Kent Messenger paid for titles in Kent, as well as Thanet Extra, Sittingbourne Extra and Messenger Extras (formerly Gravesend, Dartford & Swanley Extra) which are free titles (as no dominant paid for title exists in these areas). A press advertisement was also placed in the Tunbridge Wells Courier and Tonbridge Courier.

### **3.2.6. KCC community engagement officers**

All 12 KCC Community Engagement Officers were provided with information prior the launch of the consultation to provide them with information should any members of their communities raise the subject at meetings or make an enquiry.

### **3.2.7. Key stakeholders**

As well as communicating with individual residents of Kent, key stakeholders were also engaged with to encourage them to contribute to the consultation process. The following stakeholders were engaged with:

- All Kent parish and town councils were sent a paper copy of the questionnaire for the 1<sup>st</sup> December 2011 and were asked to make their residents aware of the consultation. Feedback was encouraged as individuals or as a combined response of the whole parish. Included within this was the Kent Association of Local Councils.
- Waste Managers from all 12 Kent district councils and Medway Council were provided with a paper and electronic copy of the questionnaire and encouraged to respond to proposals via email.
- The Environment Agency was provided with a paper copy of the questionnaire and encouraged to respond to proposals via email.
- A paper copy of the questionnaire was also sent to KCC waste contractors.
- Kent Fire and Rescue Service were also approached.

### **3.2.8. Member briefing**

A Member briefing was held on 1<sup>st</sup> November 2011 at which Cabinet Member for Environment Highways and Waste Bryan Sweetland introduced the proposed policies and facilitated a discussion. A total of 22 Members attended this with a further 24 sending their apologies. This included Members from the Conservative, Liberal Democrats and Independent parties with a good geographical spread covering all 12 district council areas. In addition, a briefing document was provided to all KCC Members from Bryan Sweetland on the 30<sup>th</sup> November 2011.

## **3.3 EQUALITY CONSIDERATIONS**

### **3.3.1 Equality groups**

Kent County Council is committed to ensuring that current and potential service users will not be discriminated against on the grounds of their social circumstances or background, such as gender, race, colour, ethnic origin, religion or belief, disability, gender identity, sexual orientation or age. As a result, a letter and / or e-mail was sent to over 150 equalities groups across the county to inform them of the consultation and to ask them to circulate the information to members of their groups / communities. These groups were informed that responses were welcome from individuals or as a group/ organisation. The following groups were contacted:

- Age groups, including all age forums in Kent
- BME groups
- Disability groups
- Gender groups
- Refugee groups
- Religion groups
- Sexuality groups.

Furthermore, consultation questionnaires were provided to influential members of the Gypsy and Irish Traveller communities to disseminate amongst their communities as it was felt that these had not been represented elsewhere.

### 3.3.2 Alternative formats

Prior to the launch of the consultation, the consultation questionnaire was produced in alternative formats:

- Easy Read;
- Large Print;
- Audio format; and
- Braille.

Alternative language formats would have been accommodated if required, however, no requests were received.

### 3.4. SCALE OF CONSULTATION ENGAGEMENT

Table 3 below identifies the distribution of each of the communication methods along with an estimate of the potential reach achieved. The 'reach' provides an indicative – rather than exact - figure of the number of households in Kent directly communicated with. For example, the newspaper titles alone which included the press advertisement could be read by approximately 34% of households in Kent.

COMMUNICATION METHOD	REACH
<b>Measurable reach figures</b>	
Direct mail – paper questionnaire	2,848 households <i>This includes an up-weighting in Richborough and Hawkinge</i>
Direct mail - postcards	8,153 households <i>This includes an up-weighting in Richborough and Hawkinge</i>
Postcards – handed out at HWRCs	5,500 unique visitors which is equal to approximately 8% of all weekly users
Press ads	Readership – 493,375 people which equates to approximately 205,500 households
<b>Un-measurable reach figures</b>	
Gateway – screens, postcards and paper copies	Available in all 9 Kent Gateways
Libraries – posters and postcards	Available in all 99 KCC Libraries and 11 mobile libraries
Sports clubs/ societies - poster	Sent to 123 selected sports clubs
Community centres - poster	Sent to 7 community centres in the Sandwich, Ramsgate and Folkestone areas <i>These were included to make the consultation more accessible to residents living near Richborough and Hawkinge</i>
Diversity groups – letter and/	Sent to 12 Older People's Forum chairs

or email	Sent to 164 other diversity groups Email sent to the 4 KCC staff groups
Community Engagement Officers - email	Email sent to the 12 KCC Community Engagement Officers
<b>Stakeholders</b>	
Parish and Town Councils – letter and paper copy	Sent to all 305 town and parish councils
District Council Waste Managers – letter and paper copy	Sent to 12 Kent district/ borough councils and Medway Council
Environment Agency – letter and paper copy	Sent to the Area Manager for Kent & East Sussex
KCC HWRC contractors – letter and paper copy	Sent to all 5 HWRC contractors
Kent Fire and Rescue Service	Kent Fire and Rescue Service were approached

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## 4. EQUALITIES IMPACT ASSESSMENT

KCC is committed to providing the best level of HWRC service to all its customers. To ensure this happens we need to take robust and relevant assessment of the likely impact of our work on the diverse communities and individuals who live in Kent. The Equality Impact Assessment (EIA), aside from being a legal duty for public bodies to complete, also provides a process to help us to understand how the proposed HWRC policies and service changes may affect Kent residents from all communities. The EIA will help to ensure that KCC is providing an inclusive HWRC service.

An EIA was completed prior to commencing the consultation, which shaped the engagement and participation mechanisms, to provide the opportunity for participation equally across Kent communities and being mindful of communication preferences and accessibility of information.

The EIA was reviewed after the consultation to enable KCC to respond to any new issues that arose during the consultation and to ensure no groups were disadvantaged.

Table 4 (page 19) is an action plan in response to impacts identified for the protected characteristics (e.g. age, disability) which is to be implemented in response to policy changes.

You can view the [full EIA](#).

Table 4: EIA Action plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>AGE</b>	Change in operational HWRC policies following a Cabinet decision.	Communicate the outcome of the review and public consultation to older residents.  Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with older customers.	Outcome of HWRC Review made available to older people.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012
	Possible increase in journey distance and time for some residents who have been using Hawkinge and Richborough HWRCs to date.	Provide comprehensive, targeted and timely communication to older people to support awareness of alternative HWRCs available to them in their locality.  Ensure information about all council waste services is accessible to older people to provide them with choice for their waste disposal needs.	Older people receptive to communications delivered.  Older residents able to dispose of their waste appropriately.  Older people aware of alternative HWRCs and able to locate them easily.		
	Decrease in journey time for residents in Tonbridge and Malling and north Maidstone areas with additional HWRC provided.	Advertising of new HWRC during build phase to inform potential service users of new facility.  Promotion of the opening of the new HWRC to older people within the 'catchment' area.	Older people aware of new HWRC, the nature of the service and the location.		Subject to capital programme
	Ensure older people are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately.	Ensure preferred communication channels are utilised to communicate with these target audiences, drawing on Mosaic information and local data.	Communication of key information is received by older people with ease.		To support all delivery. In accordance to the capital programme and existing site improvement plans.

<sup>1</sup> Remains within 20 minute drive time, equitable for residents elsewhere in east Kent.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>DISABILITY</b>	Change in operational HWRC policies following a Cabinet decision.	Communicate the outcome of the review and public consultation to organisations representing disability.  Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with customers who have disabilities.	Outcome of HWRC Review made available to residents with disabilities through representative organisations / groups in Kent.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012
	Cabinet approval for HWRC network infrastructure development and improvements will enable accessibility to be enhanced.	Ensure accessibility for customers with disabilities is fully considered at design stage for new HWRCs and for site improvements at existing HWRCs.  Engage with disability groups within Kent to help inform new site design or improvements.  Communicate site improvements / design to communities representing disability.	Improved accessibility for customers with disabilities.	Head of Waste Management	To support all delivery. In accordance to the capital programme and existing site improvement plans.
	Accessibility to site for customers with over-height adapted vehicles.	Develop procedure to ensure customers with over-height adapted vehicles are able to access HWRCs at their convenience and for KCC to communicate this appropriately to relevant customers.  Provide comprehensive, targeted and timely communication to disability groups / organisations in Kent Or individuals upon request), to support awareness of alternative HWRCs available in the locality.  Distribute information about all council waste services to disability groups / organisations in Kent, so that people have choices as to how to dispose of their household waste.	Equitable access for customers with disability vehicles requiring entry to HWRCs.  Residents with disabilities able to dispose of their waste appropriately.  Residents with disabilities aware of alternative HWRCs and able to locate them easily.		Procedures developed April 2012 Customer engagement from May 2012 From June 2012

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>RACE</b>	Change in operational HWRC policies following a Cabinet decision.	<p>Ensure that the outcome of the HWRC Review and public consultation is made available in alternative languages and appropriate formats for ethnically diverse residents of Kent.</p> <p>Develop and deliver an implementation plan for introduction of new operational policies which provides for engagement with ethnically diverse customers.</p>	<p>Outcome of HWRC Review made available to organisations / groups representing ethnic groups in Kent.</p> <p>Implementation prepared and budget secured.</p>	Head of Waste Management	April / May 2012
<b>PREGNANCY AND MATERNITY</b>	Change in operational HWRC policies following a Cabinet decision.	<p>Communicate the outcome of the review and public consultation.</p> <p>Develop and deliver an implementation plan for introduction of new operational policies – with regard to this protected characteristic HWRC site staff will continue to provide pregnant women with assistance for carrying and lifting waste materials, and ensuring children remain in vehicles for safety. Ensure that this is communicated sensitively in customer information.</p>	<p>Outcome of HWRC Review made available.</p> <p>Implementation prepared and budget secured.</p>	Head of Waste Management	April / May 2012
	Possible increase in journey distance and time for some residents who have been using Hawkinge and Richborough HWRCs to date.	<p>Provide timely communication to support awareness of alternative HWRCs available in the locality.</p> <p>Ensure information about all council waste services is accessible to residents to provide them with choice for their waste disposal needs.</p>	<p>Pregnant women and / or those with young children are able to dispose of their waste appropriately.</p> <p>Parents aware of alternative HWRCs and able to locate them easily.</p>		From June 2012

## 5. RESPONDENT PROFILE AND ACTIVITY

### 5.1 NUMBER OF RESPONSES RECEIVED

**Total responses received: 3,499**

- **Customer responses:** 3,456 consisting of:
  - 1,400 paper responses; and
  - 2,056 online responses.
- **Stakeholder responses:** 43 stakeholder responses were received from district councils, parish councils, waste management contractors and other agencies.

Of these responses, 2 respondents requested large print versions of the consultation questionnaire. 4 responses, one of which being Easy Read, were received over the telephone and entered directly online by KCC officers.

As an example comparator, a recent Minerals & Waste consultation for the 'Core Strategy and Minerals and Waste options' received around 3,500 responses, some which were from the same individuals. A subsequent 'supplementary options' consultation received 362 responses from 213 individuals.

### 5.2 RESPONSE RATE AND METHOD

Table 5 below details the responses received via the various methods of response submission, with response rates where calculation has been possible.

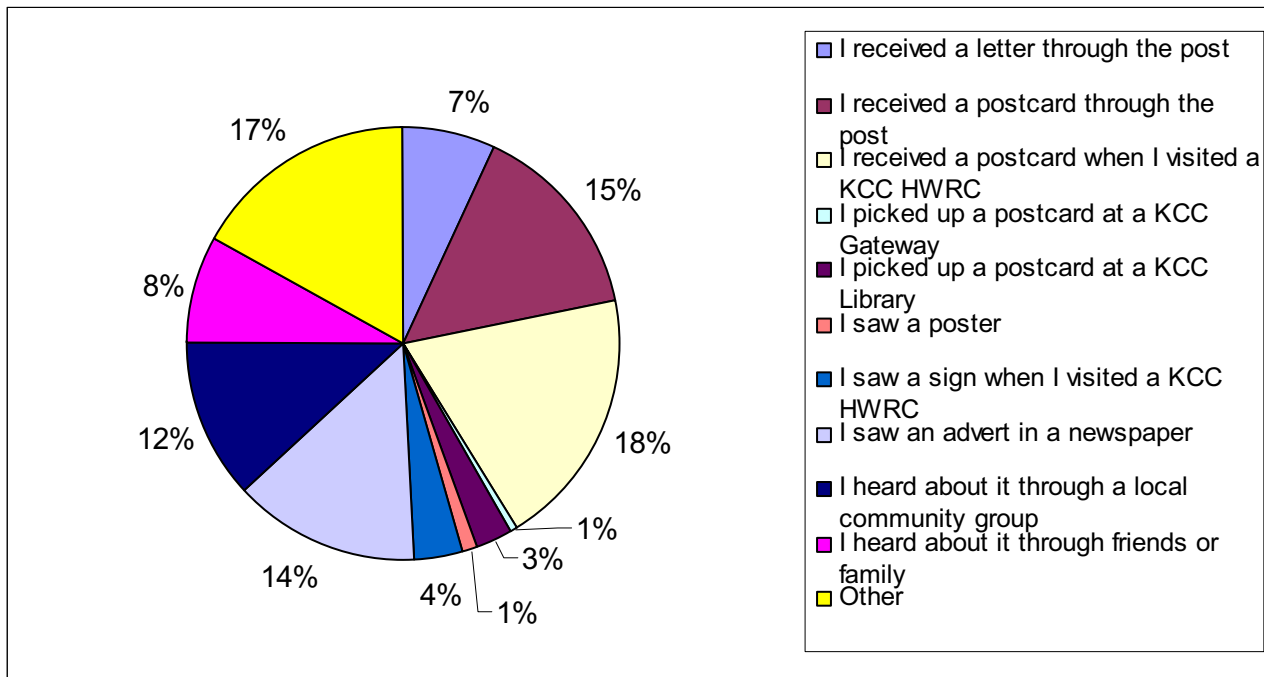
Response submission method	Number of responses received	Response rate
Total completed paper questionnaires received	1,400	45%
Total online questionnaires submitted	2,056	N/A
District Council responses received	8/13	62%
Town/ Parish Councils responses received	28/305	9%
Environment Agency response received	1/1	100%
HWRC Contractor responses received	2/5	40%

Table 6: Responses received according to submission method

The high response rate of 45% for the paper questionnaire is attributable to the targeted direct mail using Mosaic data. All online respondents were additionally asked 'how did you hear about the public consultation'? Graph 1 below presents the responses to this question. Please

note, respondents were able to choose more than one communication method, therefore the percentage has been calculated from all answers rather than the number of respondents.

Graph 1: How those respondents who completed the questionnaire online heard about the consultation.



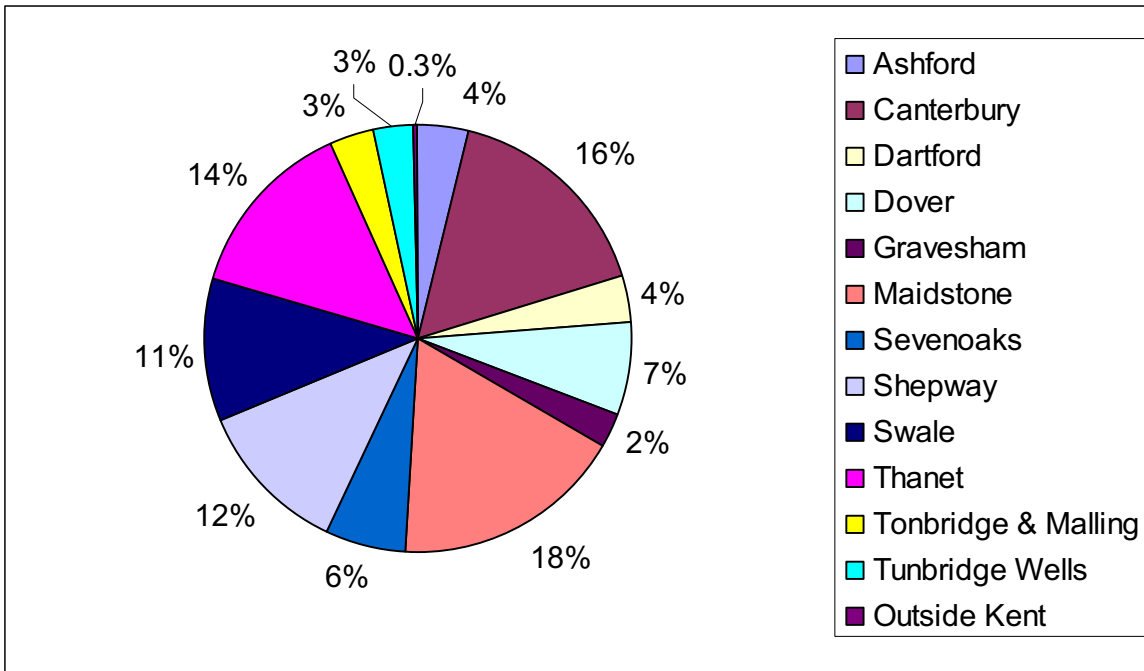
17% of respondents commented that they had heard about the consultation through 'other' means. These 'other' responses can be found in table 7 below.

	Number of respondents		Number of respondents
Parish Council	74	I am a councillor	5
Website (unspecified)	55	Told about whilst visiting HWRC	4
Email	43	Email through work	4
KCC Website	39	Community Warden	3
Local council website	15	Radio	3
Watch (eWatch + Neighbourhood Watch)	11	News	3
Local newsletter/online publication	8	Knet	1
BBC Website	7	Petition in shop	1
Email through work at LA	7	In response to my letter	1
Facebook	6	Ceefax	1
Email from Staff group	5	Can't remember	1
Twitter	5	Letter from work	1

Table 7: 'Other' response composition

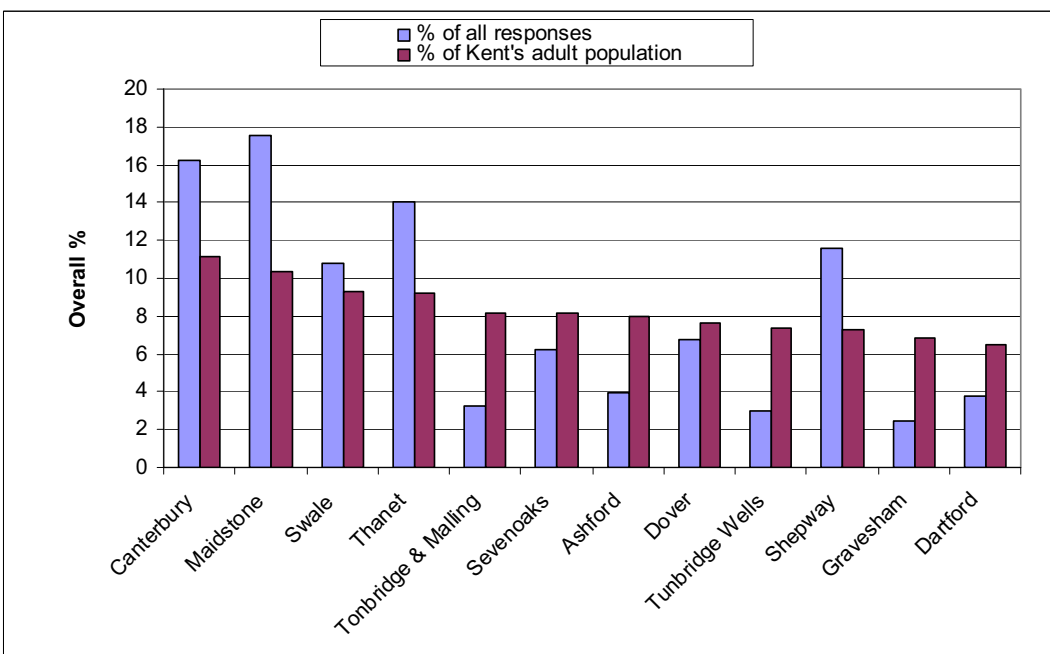
### 5.3 CUSTOMER RESPONSE PROFILE

Out of the total number of 98% provided their post code. Graphs 2 and 3 below represent the distribution of the recognisable post codes provided by 3,253 customer respondents (94%).



Graph 2: Geographical distribution of customer respondents, grouped by Kent district

Please note that out of the 3,390 postcodes provided, 137 were unrecognisable on the software used for this analysis. This distribution has been influenced by the diversity of communications distributed throughout Kent e.g. up weighted communications for the Hawkinge and Richborough areas



Graph 3: Geographical distribution of customer responses - % of responses against % of Kent's adult population.

## 5.4 STAKEHOLDER RESPONSE PROFILE

A total of 43 responses were received from stakeholders including district and parish councils, waste management contractors and other agencies.

Table 6: Stakeholder respondents and date response received

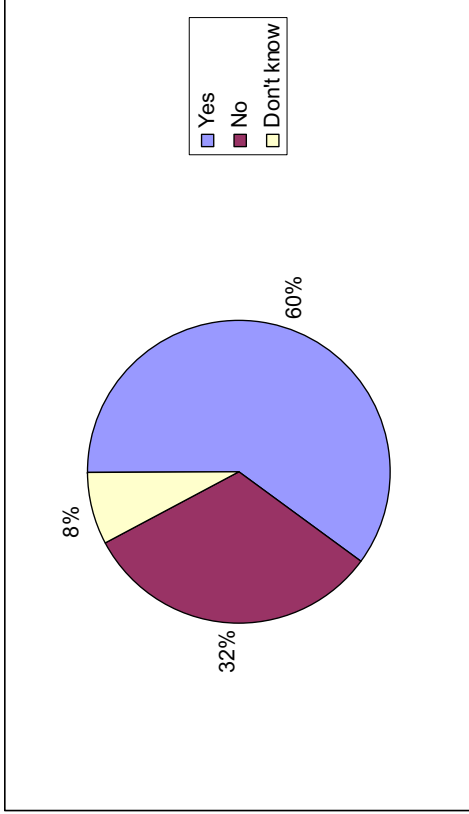
Respondent type	Respondent	
<b>Parish council (28 responses)</b>	Lydd Town Council	Brasted PC
	Challock PC	Doddington PC
	Preston & Elmstone Village Society	The Ramsgate Society
	Shoreham PC	Boxley PC
	Walmer PC	Hothfield PC
	Faversham Town Council	Preston PC
	Sevenoaks Districts Seniors Action Forum	West Malling PC
	Swanley Town Council	Stanford PC
	Bilsington Parish Council	Swingfield Minnis Parish Council
	Kemsing PC	Lynsted and Kingsdown PC
	Bredhurst Parish Council	Sundridge With Ide Hill PC
	Hawkinge TC	Sevenoaks TC
	The Kent Association of Local Councils (KALC)	Cliffsend PC
	Southfleet Parish Council	Vigo Parish Council
<b>District Council (8 responses)</b>	Canterbury CC	Thanet DC
	Maidstone BC	Gravesham BC
	Tonbridge and Malling BC	Dover DC
	Dartford BC	Shepway DC
<b>Other agencies (4 responses)</b>	Kent Fire and Rescue Service	West Kent YMCA
	Environment Agency	CPRE Kent
<b>WM contractor (3 responses)</b>	Roud Recycling	Sita
	WRG	

It should be noted that in addition to the engagement materials disseminated a Kent County Council Waste Manager, presented at a public meeting chaired by Hawkinge Town Council on 10<sup>th</sup> January 2012 in order to engage further with those concerned parties.

## 6 OPERATIONAL POLICY CHANGES: CONSULTATION RESPONSES

Please note: Customer responses (3456) have been used for the following analysis, with the stakeholder responses being identified separately and qualitatively. The responses to each question are considered one at a time. Not every question had to be answered by respondents and as a result the number of responses will not add up to 3,456 each time.

**6.3 Do you consider that items such as tyres, asbestos and gas bottles, which are mainly commercial waste, should be excluded from Household Waste Recycling Centres, provided other disposal routes are available? (Question 7)**



**Stakeholder response summary:**

**Key comments**

- 1 tyre / bottle per visit for free
- Charge for these materials if it means the facilities are HWRCS can remain increase in flytipping would result
- Where would householders take these items? Alternative disposal points would need to be well promoted
- Section 51 EPA – legal duty to accept materials for disposal
- Financial impact upon householder for cost of disposal
- Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse
- It is reasonable to expect these items to come from the householder
- Policy is not in line with Vision for Kent or Kent Environment Strategy
- Policy ignores the inherent value in waste that could be gained by introducing charges for trade waste disposal
- Hazardous nature of materials – environmental risks and costs associated with fly tipping materials
- Impact assessment required
- Gas cylinders are likely to be empty upon disposal – low risk of explosion
- Gas bottles can be taken back and exchanged, therefore, no need to accept them

**Notable sound bites**

- "Failure to accept or provide alternative means of disposal risks increased flytipping and costs to Waste Collection Authorities"
- "Any savings made would be offset by the increased cost of clearing up the materials when fly tipped – false economy"
- "Would be a retrograde step"
- "Believe this to pose a larger negative impact on householders than businesses"

**Customer response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Materials will be flytipped	377	169	546	1
Believe these materials are generated by householders and they have a need for HWRCs to accept them	278	81	359	2
Customers want a 1-stop shop for all materials and convenience of service	106	32	138	3
Lack of information about alternative disposal points	87	36	123	4
Increased cost to councils for removal of flytipping	35	8	43	5
Risk of hazardous waste being disposed of inappropriately	24	19	43	5
Allow HWRCs to accept all waste from anyone	2	1	3	
Provide alternative sites for disposal	3	0	3	
These materials increase tonnages and income for KCC	2	0	2	
Traders should be excluded from HWRCs	7	4	11	
Support ban of tyres but not asbestos or gas cylinders	7	1	8	
Charge householders for these items or limit quantity	12	4	16	
Charge traders, KCC gain income	13	4	17	
Policy risks contamination of other waste streams e.g. residual	9	5	14	
Exclude tyres and asbestos	4	3	7	
Support exclusion of tyres and gas bottles	5	0	5	
Object to any charges introduced or having to pay for a collection service	18	11	29	
KCC should be encouraging people to recycle and make it easy	16	6	22	
Policies are too restrictive and inconvenient	2	0	2	
Penalises the DIYer, home mechanic and associated costs to householders	20	3	23	
No alternative options defined by KCC	4	2	6	
Comments relating to SMEs wishing to use HWRCs	0	5	5	
<b>TOTAL</b>	<b>1031</b>	<b>394</b>	<b>1425</b>	

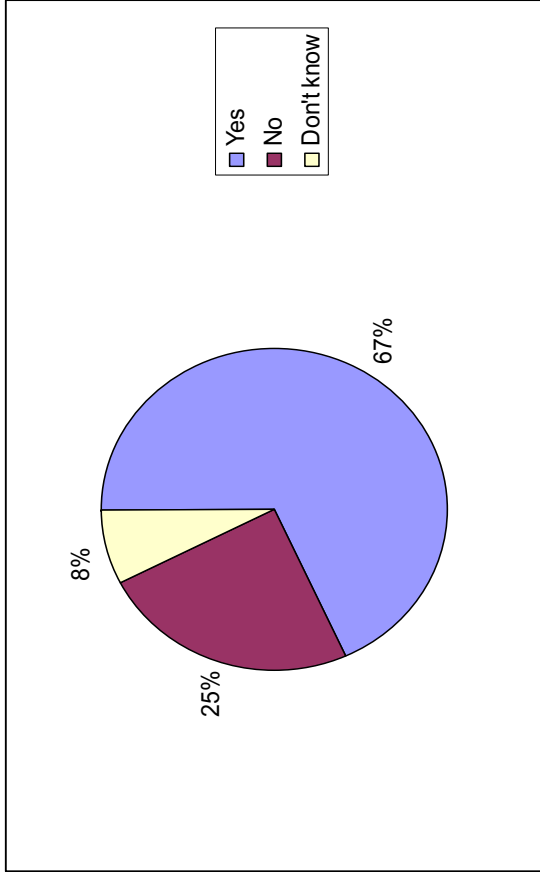
**Notable customer sound bites:**

- "There are times when householders won't dispose of these items at their convenience and to take them to a recycling site should be encouraged, as it reduces flytipping and prevents unregulated / unlicensed 'man in truck' outfits from profiteering."
- "I pay rates to dump as I please."
- "I am mindful of the fact that this costs the council, and me as a council tax payer, money but on balance I am prepared to bear the cost."

**Overarching summary:**

- 60% of respondents agreed that items such as tyres, asbestos and gas bottles, which are mainly commercial waste, should be excluded from HWRCs, with 32% responding 'no'.
- Risks identified included:
  - Potential flytipping of materials
  - A perception that these materials are generated by householders and they have a need for HWRCs to accept them
  - Customers want a 1-stop shop for all materials and convenience of service
  - Lack of information about alternative disposal points
  - Risk of hazardous waste being disposed of inappropriately
  - Increased cost to councils for removal of flytipping

**6.4 Would you support the exclusion of trade waste e.g. by ceasing to open the height barrier and excluding trade vehicles, which the Household Waste Recycling Centres have no duty to accept and costs the Council money? (Question 8)**



**Stakeholder response summary:**

**Key comments**

- Prevent legitimate customers from entering the HWRCs e.g. van hire by householders
- Do not support determining legitimate disposal by vehicle type preferred by residents
- Clear and accessible communication will be needed to residents
- Should explore potential for income from trade waste
- Increase in fly tipping and cost to district councils
- Open height barrier at weekend only
- High level of 4x4 vehicles in Sevenoaks area – will not be able to access site
- 1 district and 3 parish councils support proposal
- Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse
- Support the policy if this limits waste from non-domestic sources
- Restricts ability of residents to move large waste items around for disposal easily
- Policy does not support recycling behaviours
- The type of vehicle should be irrelevant, access should be determined by source of waste
- Suggest access for single axle domestic trailers
- Domestic vehicles should be permitted

**Notable sound bites**

- "No convinced that ceasing to open the height barrier will prevent trade waste, but may prevent some legitimate residents from using the site".
- "Diverting trade / commercial waste away from HWRCs could be turning away potential revenue"
- "Domestic users should not be caught in a restriction intended to prevent commercial abuse"
- "The vehicle type is irrelevant they type of waste should be the deciding factor"

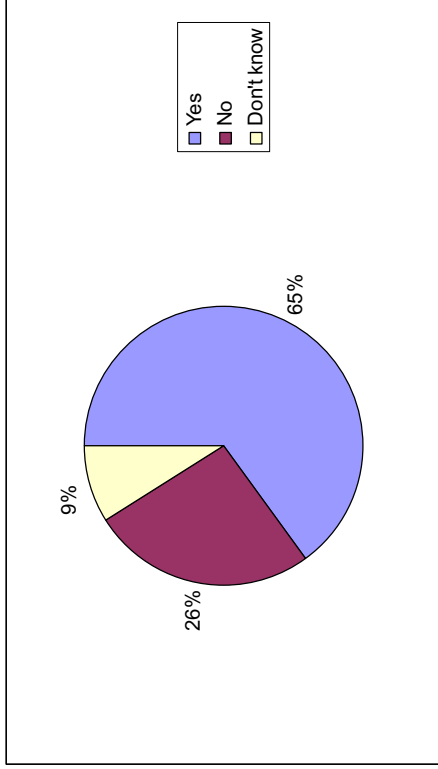
**Customer response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Increase in flytipping	287	39	326	1
Implement charging scheme for traders at HWRCs	96	27	123	2
What about householders who hire vans to transport household waste or who only have use of a van	86	36	122	3
Allow HWRCs to accept all waste from anyone - to save cost of flytipping removal and gain income from materials	70	25	95	4
Council should encourage all waste to be disposed / recycled responsibly	38	13	51	5
Concern that trade and household waste cannot be distinguished easily	4	1	5	
The questions are biased	3	0	3	
Accept trade waste at selected sites or selected times	9	1	10	
Better site management to monitor type of waste entering HWRCs	27	6	33	
Concern about increased travel time for traders to dispose of waste	8	2	10	
Lack of information about alternative disposal points	13	17	30	
Policy does not support SMEs in Kent economically	26	9	35	
Comments indicate a misunderstanding of waste law / admission of trade disposal at HWRCs	15	18	33	
This policy discriminates against me - age / people carrier vehicles for large families	3	2	5	
<b>TOTAL</b>	<b>685</b>	<b>196</b>	<b>881</b>	

**Overarching summary:**

- 67% of respondents would support the exclusion of trade waste e.g. by ceasing to open the height barrier and excluding trade vehicles. 25% of respondents would not.
- Risks identified included:
  - Potentially increased flytipping
  - What about householders who hire vans to transport household waste or who only have use of a van?
  - Instead, allow HWRCs to accept all waste from anyone - to save cost of flytipping removal and gain income from materials
  - Council should encourage all waste to be disposed / recycled responsibly
  - Implement charging scheme for traders at HWRCs instead?

6.5 Would you support the exclusion of construction waste, which the Household Waste Recycling Centres have no duty to accept and costs the Council money? (Question 9)



• Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Increase in flytipping	267	115	382	1
Penalises the DIYer, should be a provision to dispose of	180	60	240	2
Charge for ALL construction waste regardless of its source	66	18	84	3
Lack of information about alternative disposal points	50	18	68	4
Confusion as to the definition of the term 'construction waste' within this question	28	9	37	
Policy risks contamination of other waste streams e.g. residual	4	1	5	
Recycling should be encouraged and made easy	18	2	20	
Support a limit on quantity not total exclusion	19	5	24	
Would support if alternative disposal points were accessible	14	3	17	
Only commercial construction waste should be excluded	37	7	44	
Hazardous nature of material, needs managing properly	9	1	10	
SMEs should be allowed to use HWRCs	25	0	25	
Comments indicate a misunderstanding of waste law / admission of trade disposal at HWRCs	8	4	12	
Increased carbon emissions if householders are required to make multiple journeys	3	1	4	
Charge for ALL construction waste regardless of its source	14	1	15	
Create a separate 'time' for traders to use sites	3	0	3	
These are valuable materials which generate an income	40	5	45	
<b>TOTAL</b>	<b>785</b>	<b>250</b>	<b>1035</b>	

• Stakeholder response summary:

Key comments
<ul style="list-style-type: none"> <li>Confusion over what is meant by 'construction waste' – municipal or commercial?</li> <li>Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse</li> <li>Restriction on quantity will increase number of journeys made by householders – increase in carbon emissions</li> <li>Policy is not in line with Vision for Kent or Kent Environment Strategy</li> <li>The quantity limit is too low</li> <li>Loss of valuable commodity</li> <li>Need for robust enforcement strategy and costly to enforce at HWRCs</li> <li>Request from district council for fly tipping funding</li> </ul>

Notable sound bites

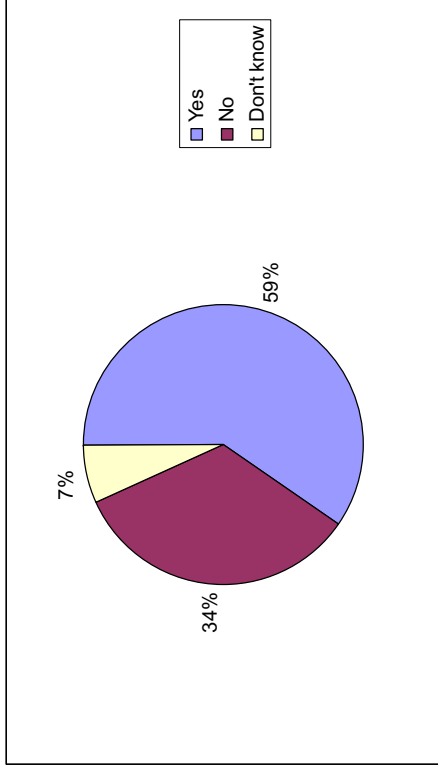
"Limiting quantity will increase the number of trips by the user to dispose of the same amount of waste"

"Believe to be a too great a step between the very small quantity of rubble that could be disposed of in 2 sacks and the very large capacity obtained by the hiring of a skip"

• Overarching summary:

- 65% of respondents would support the exclusion of construction waste at HWRCs. 26% would not.
- Risks were identified including:
  - Potential increase in flytipping
  - Concern over penalising the DIYer, should be a provision to dispose of
  - Charge for ALL construction waste regardless of its source?
  - Lack of information about alternative disposal points

6.6 Do you believe it is reasonable for householders who do not live in Kent, and therefore do not contribute to the funding of sites, to be excluded from using Kent's Household Waste Recycling Centres? (Question 11)



Part C  
 6.6  
 6.6

Stakeholder response summary:

Key comments
<ul style="list-style-type: none"> <li>This is as long as it is short</li> <li>Does this include the relationship with Medway</li> <li>Negative impact on residents purse – funding of longer journeys</li> <li>Does not encourage recycling</li> <li>Duty to co-operate with neighbouring councils</li> <li>Difficult to police the policy</li> <li>Costly to introduce the policy</li> <li>Greater carbon impact from increased journey times</li> </ul>
<p><b>Notable sound bites</b></p> <p>“Residents will wish to use their nearest facilities whether across the county border or not”.</p> <p>“Common sense says use the nearest facility”</p>

Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Reciprocal arrangement with neighbouring councils is required; balance across border; petty proposal	188	99	287	1
Risk of increased flytipping from restrictions	175	49	224	2
Convenience to use nearest HWRC regardless of borders	139	73	212	3
Environmental impact from increased distance to sites	125	16	141	4
Should be encouraging recycling not deterring	102	29	131	5
Boundaries shouldn't matter to customer services	113	15	128	6
Support proposal to ban cross border users	40	12	52	
Question is loaded	2	0	2	
Additional tonnages will yield additional income for KCC	86	28	114	
Costly to administer and police permit scheme; cost outweighs savings	93	42	135	
Cross border users put pressure on Kent services	3	0	3	
<b>TOTAL</b>	<b>1066</b>	<b>363</b>	<b>1429</b>	

Notable customer sound bites:

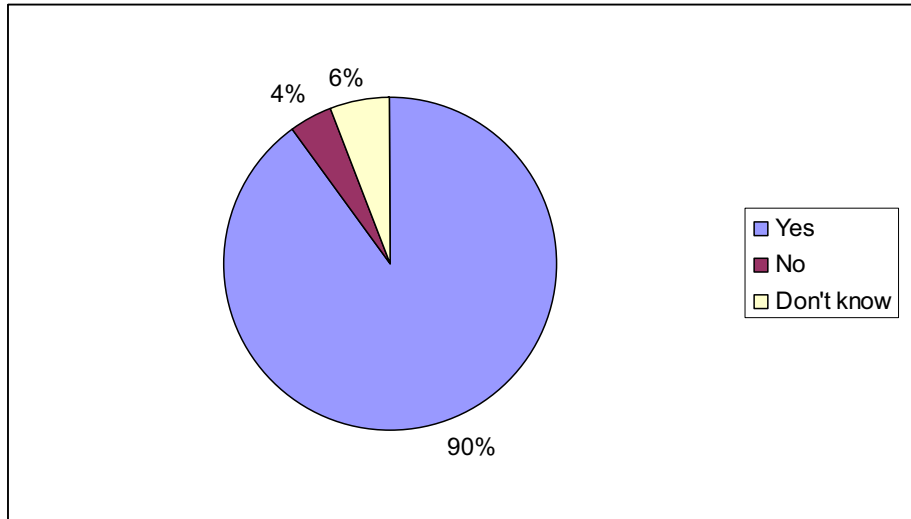
“In the larger picture we are all UK residents and we all pay national and local taxes, therefore it is from on ‘public purse’. We need to work together for things to work smoother.”

“The borders between counties are national for tax purposes. Do you propose border guards?”

Overarching summary:

- 59% of respondents believe it is reasonable for householders who do not live in Kent to be excluded from using Kent's HWRCs. 34% of respondents do not believe it would be reasonable.
- Risks were identified including:
  - Reciprocal arrangement with neighbouring councils is required; balance across border; petty proposal
  - Increase in flytipping
  - Convenience to use nearest HWRC regardless of borders
  - Environmental impact from increased distance to sites
  - Should be encouraging recycling not deterring
  - Boundaries shouldn't matter to customer services

**6.7 Do you believe that councils should increase income by maximising the diversion of household waste for recycling? (Question 10)**

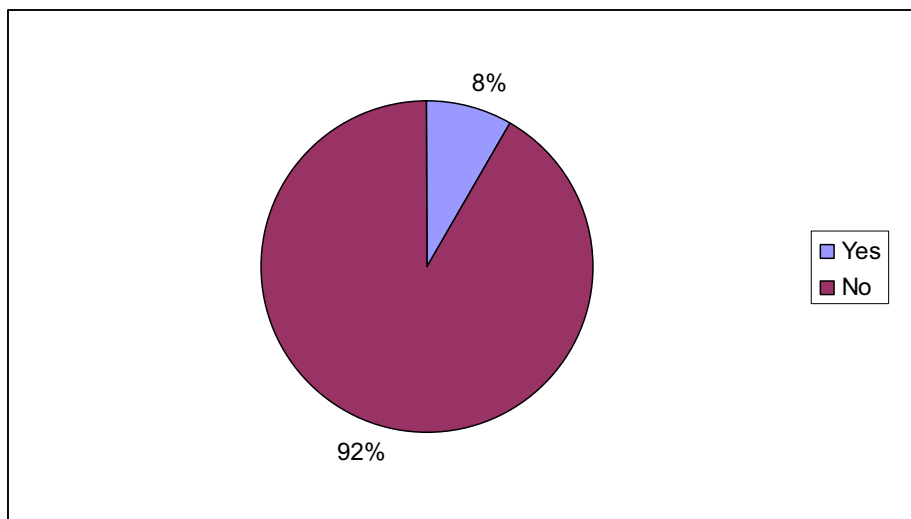


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**• Overarching summary:**

- 90% of respondents believe that councils should increase income by maximising the diversion of household waste for recycling.

**6.8 Do you use Household Waste Recycling Centres in other areas? (Question 12)**



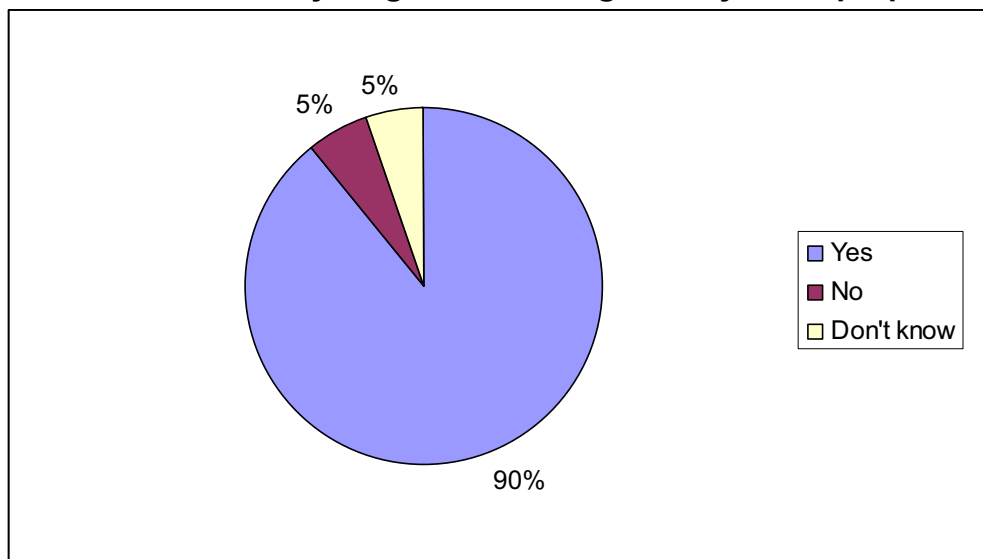
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**• Overarching summary:**

- 8% of respondents use HWRCs in other areas.
- Of those that do use HWRCs in other areas, 57% use Medway sites.

## 7 INFRASTRUCTURE INVESTMENT: CONSULTATION RESPONSES

### 7.3 Thinking of the Council's aim to continuously improve sites, do you believe that the Household Waste Recycling Centres are generally fit for purpose? (Question 13)



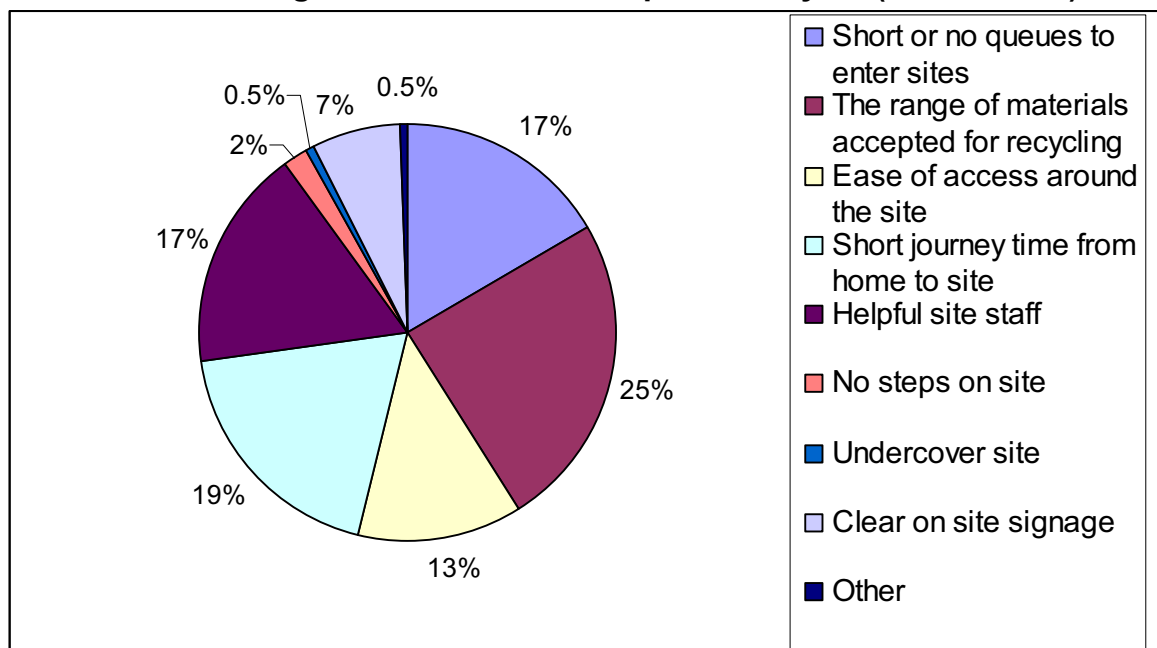
#### • Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
HWRC too small and poorly designed	56	24	80	1
Negative experience of queues to access HWRC and congestion	34	8	42	2
Need to increase material streams	23	8	31	3
Site staff - unhelpful and too many	17	5	22	4
Re-use / shop facility on sites wanted	14	2	16	
Opening hours - increase	10	1	11	
Greater extraction of recyclate from residual stream	11	2	13	
Accessibility of containers and manual handling difficulties	8	3	11	
Pedestrian issues on site	7	1	8	
Lack of access for over height vehicles	8	0	8	
Site signage improvements needed	4	0	4	
Journey time from home too great	4	0	4	
<b>TOTAL</b>	<b>173</b>	<b>45</b>	<b>219</b>	

#### • Overarching summary:

- 90% of respondents believe that the HWRCs are generally fit for purpose.
- Key criticisms of the centres included:
  - HWRC too small and poorly designed
  - Negative experience of queues to access HWRC and congestion
  - Need to increase material streams
  - Site staff - unhelpful and too many

**7.4 To help shape the future network of Household Waste Recycling Centres, please tell us which of the following are the three most important to you. (Question 14)**



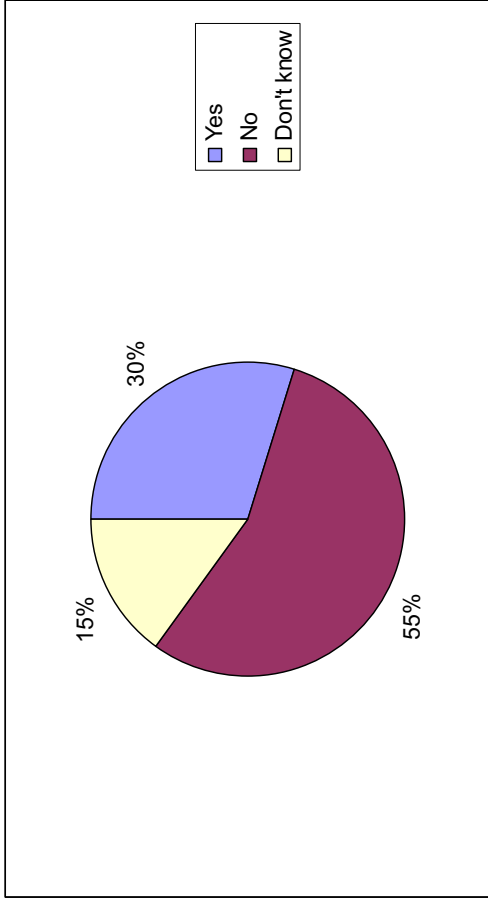
**Customer response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Improve safety - ease of exit, site design, larger signage	1	7	8	1
Re-use / shop facility on sites wanted	5	2	7	2
Longer opening hours	4	2	6	3
Allow access to people on foot	3	2	5	
Increase materials accepted - plastics	3	1	4	
More publicity about HWRCs	1	0	1	
Better customer care from site staff	1	0	1	
Staff that are able to make a decision without hiding behind health and safety	1	0	1	
Clean and clear sites and entry roads	2	0	2	
<b>TOTAL</b>	<b>21</b>	<b>14</b>	<b>35</b>	

**Overarching summary:**

- Most respondents identified the range of materials accepted on site as one of the most important factors of HWRCs.
- Short journey times, short queues at the site, helpfulness of site staff and ease of access around the site as important.
- Many respondents specified a desire for a reuse facility on site and longer opening hours.

7.5 Would you support an overall reduction in one or two sites across Kent, provided the service continued to be operated to a good standard across the remainder of Household Waste Recycling Centres? (Question 15)



• Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Increased fly tipping	405	160	565	1
Increased travel time / cost / inconvenience	330	212	542	1
Number of sites needs to be increased, not reduced	198	67	265	2
Less sites will lead to less recycling	155	20	175	
Negative environmental effect	114	20	134	
Increased queues, traffic and pressure at other sites	103	28	131	
Need to improve services to make money / improve income generation	29	10	39	
Not enough info provided to be able to comment	22	5	27	
Reduction in employment	4	2	6	
<b>TOTAL NUMBER OF COMMENTS</b>	<b>1,338</b>	<b>519</b>	<b>1,857</b>	

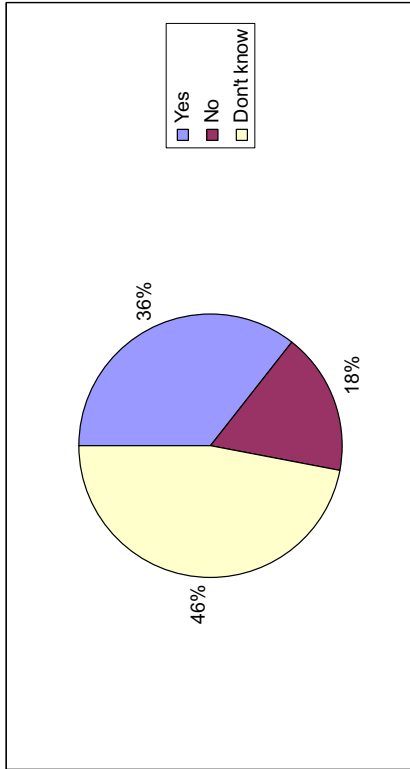
• Stakeholder response summary:

Key comments
<ul style="list-style-type: none"> <li>• Ensure sufficient capacity at sites – footfall and tonnages</li> <li>• Reducing number of HWRCs is not conducive to reducing waste to landfill</li> <li>• A 20 minute drive time guideline is supported</li> </ul>
Notable sound bites
<p>“Sites should be local to populations and within a 20 minute drive time”</p>

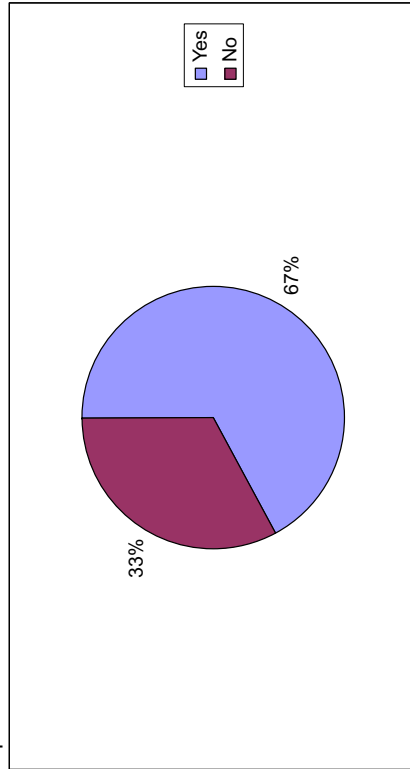
• Overarching summary:

- 30% of respondents would support an overall reduction in one or two sites across Kent, provided the service continued to be operated to a good standard across the remainder of HWRCs.
- 55% of respondents would not support an overall reduction.
- Risks were identified including:
  - Increase in flytipping
  - Convenience to use nearest HWRC regardless of borders
  - Increased travel time / cost.
  - Environmental impact from increased distance to sites
  - Should be encouraging recycling not deterring
  - Boundaries shouldn't matter to customer services

7.6 Taking into account proposals to improve the facility at Ashford, do you believe it is reasonable to close the out of date and expensive to operate site at Hawkinge, provided services exist within a 20 minute drive time of your home? (Question 16)



The graph below excludes those that answered 'don't know'



• Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Other HWRCs are too far to travel	69	27	96	1
Improve Hawkinge HWRC	25	7	32	2
Increase flytipping	24	8	32	2
Increase in fuel cost to residents and pollution from increased journeys	19	9	28	4
Closure would increase costs to councils e.g removal of flytipping; further to haul waste	3	0	3	
Should expand number of HWRCs not reduce them	7	3	10	
The questions are biased and leading	4	2	6	
The HWRC is a service to the community and is convenient	8	8	16	
Need the HWRC as alternate weekly collections are not sufficient	0	0	0	
Adverse effect on recycling	5	5	10	
Increased congestion at alternative HWRCs	12	7	19	
There will be a local increase in housing development - the HWRC is needed	9	8	17	
Find ways to reduce the operating costs of the HWRC to allow it to remain open	2	3	5	
Why is the Hawkinge site so expensive to operate	0	0	0	
<b>TOTAL</b>	<b>187</b>	<b>87</b>	<b>274</b>	

• Overarching summary:

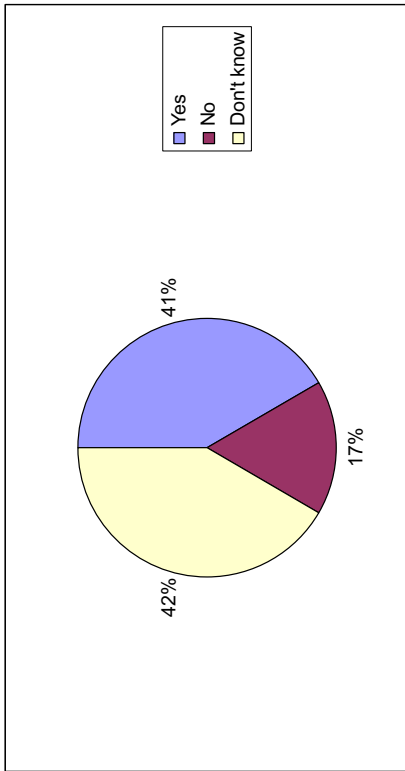
- 36% of all respondents believed it is reasonable to close the site at Hawkinge.
- 46% of respondents answered they 'did not know' – after excluding these responses, 67% of the remaining respondents believed it is reasonable to close the site at Hawkinge.
- Further analysis reveals that of those respondents that use Hawkinge HWRC, 92% believe it should not be closed.
- The main reasons that people answered 'no' to closing Hawkinge HWRC are:
  - Journey times will be increased
  - Hawkinge should be improved/ updated
  - Increase in flytipping
  - Increase in fuel cost to residents and pollution from increased journeys
  - Hawkinge is a growing town/ area and needs it's own HWRC
  - Some respondents state that the question is loaded and misleading
  - Some state that Ashford HWRC is more than 20 minutes away/ too far to travel to

• Stakeholder response summary:

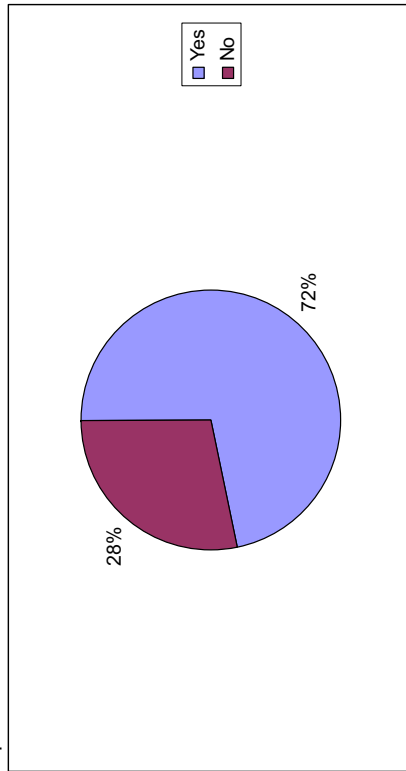
**Key comments**

- Shepway DC support – provided no additional cost is incurred by the district, but does ask KCC to seriously consider
- Closure not supported by local parish and town councils
- Increase in travel time and associated journey cost and emissions; risk of flytipping
- Support reduced number of materials accepted to reduce operating costs
- Misleading question and unsubstantiated statement – “out of data and expensive to operate”
- Ambiguous question – transfer station or HWRC for closure?
- Concerns about impact on Whitfield and Folkestone HWRCs

7.7 Taking into account that there is a facility at Deal and at Margate, do you believe it is reasonable to close the out of date and expensive to operate site at Richborough, provided services exist within a 20 minute drive time of your home? (Question 17)



The graph below excludes those that answered 'don't know'



Customer response summary:

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Other HWRCs are too far to travel	32	37	69	1
The road infrastructure does not make the alternative HWRCs easily accessible	34	20	54	2
The HWRC is always busy and shouldn't be closed	17	14	31	3
Increase flytipping	12	14	26	4
Closure would increase costs to councils e.g. removal of flytipping; further to haul waste	3	3	6	
Improve Richborough HWRC	9	1	10	
Should expand number of HWRCs not reduce them	2	4	6	
The questions are biased and leading	1	1	2	
The HWRC is a service to the community and is convenient	4	13	17	
Adverse effect on recycling	9	5	14	
Increase in fuel cost to residents and pollution from increased journeys	13	7	20	
There will be a local increase in housing development - the HWRC is needed	3	1	4	
Find ways to reduce the operating costs of the HWRC to allow it to remain open	5	0	5	
Why is the Richborough site so expensive to operate	6	2	8	
<b>TOTAL</b>	<b>150</b>	<b>122</b>	<b>272</b>	

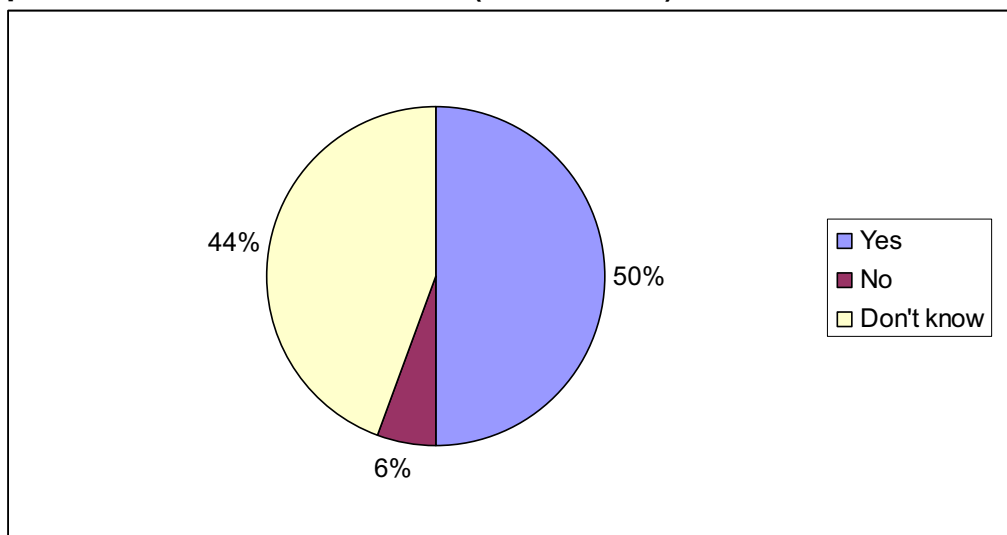
Overarching summary:

- 41% of all respondents believed it is reasonable to close the site at Richborough.
- 42% of respondents answered they 'did not know' – after excluding these responses, 72% of the remaining respondents believed it is reasonable to close the site at Richborough.
- Further analysis reveals that of those respondents that use Richborough HWRC, 80% believe it should not be closed.
- The main reasons that people answered 'no' to closing Richborough HWRC are:
  - Journey times will be increased – 20 minutes is too far
  - The road infrastructure does not make the alternative HWRCs easily accessible
  - Increase in flytipping
  - The HWRC is always busy and shouldn't be closed
- A few respondents commented that Richborough HWRC should stay because the Thanet Waste is being expanded.

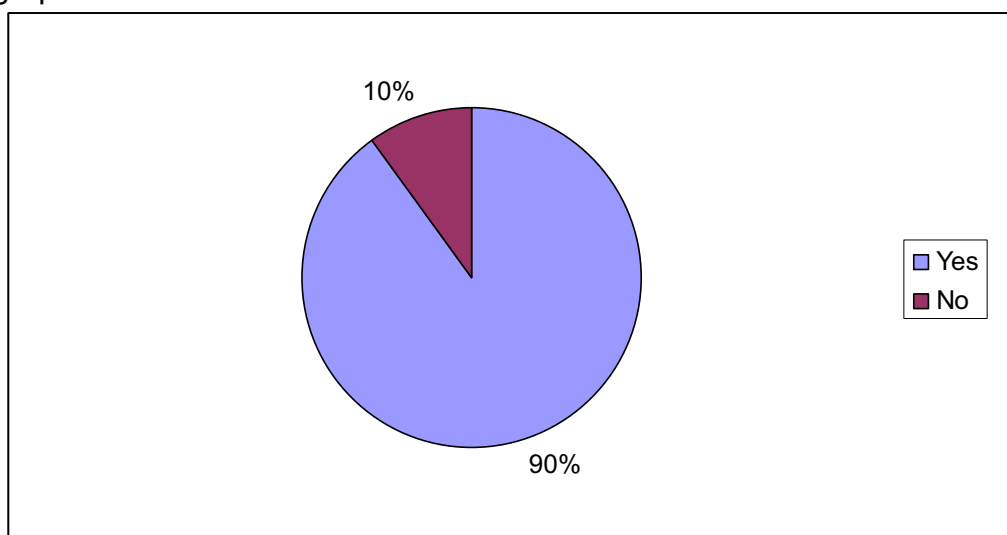
Stakeholder response summary:

Key comments
Additional journey time for residents to alternative HWRCs
Adverse traffic impacts on local road network around Deal and Whitfield – review and advantage taken of Section 106 Town and Country Planning Act 1990 for highway improvements
Several responses do not support the closure
Deal Transport and Flood Alleviation Study – infrastructure assessment
Margate HWRC necessitates a longer walk with heavy items
Please consider older people who would have further to drive
Increase in flytipping
How is the site out of data?
Location provides a service to southern half of the Thanet district
<b>Notable sound bite</b>
"If it is an expensive site, why not replace with a more modern facility to reduce costs"

**7.8 The Household Waste Recycling Centres at Dartford Heath and Swanley currently operate at full capacity with no scope for expansion. Do you agree they should be replaced with modern facilities? (Question 18)**



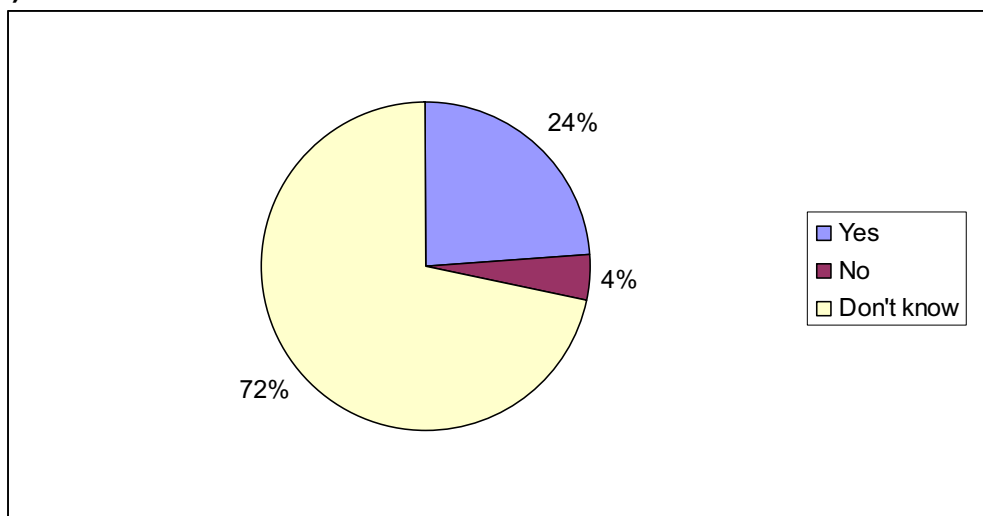
The graph below excludes those that answered 'don't know'



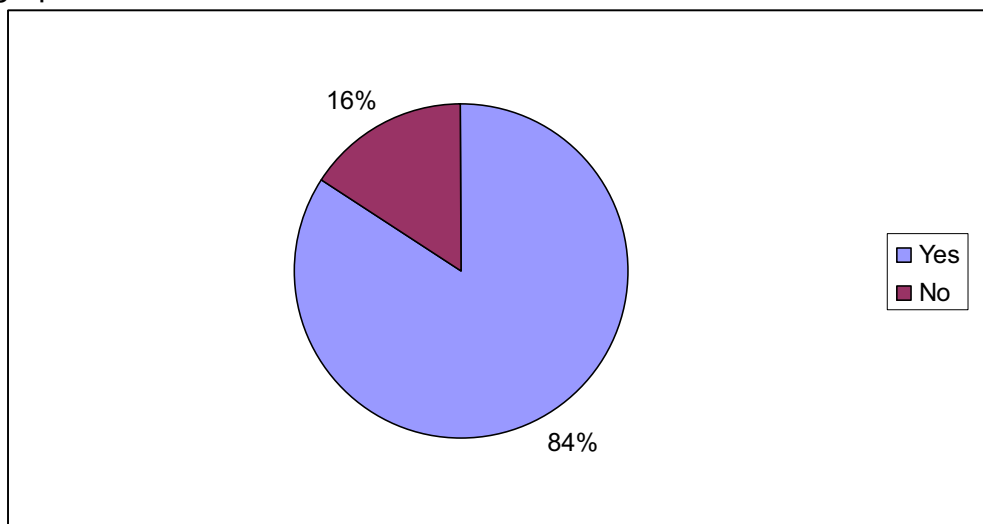
**• Overarching summary:**

- 50% of respondents believe that the Household Waste Recycling Centres at Dartford Heath and Swanley should be replaced with modern facilities.
- Further analysis reveals that of those respondents that use Dartford Heath and Swanley HWRC, 47% believe they should be replaced with modern facilities.
- The main reasons that people answered 'no' to replacing Dartford Heath and Swanley with more modern facilities are:
  - Respondents believe that the sites are fine as they are
  - Respondents are concerned that updating them would mean moving them to one site rather than two separate sites
  - Some respondents feel that there is not enough information provided to make judgement e.g. what is meant by 'modern facilities?'
- Dartford Borough Council supported this proposal.

**7.9 Do you agree that the Household Waste Recycling Centre at Church Marshes, Sittingbourne, is inadequate and should be replaced with a new facility at a more accessible location, to provide a more efficient service to Swale residents? (Question 19)**



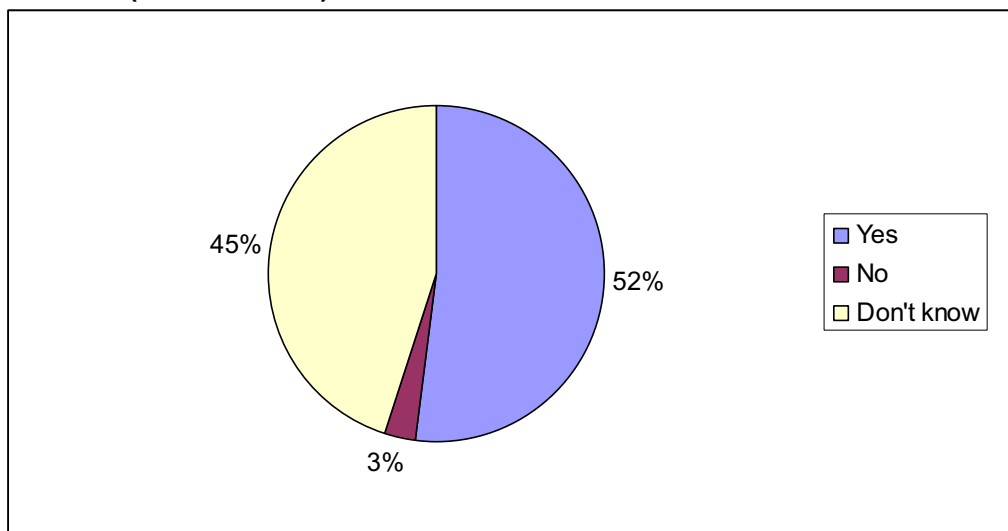
The graph below excludes those that answered 'don't know'



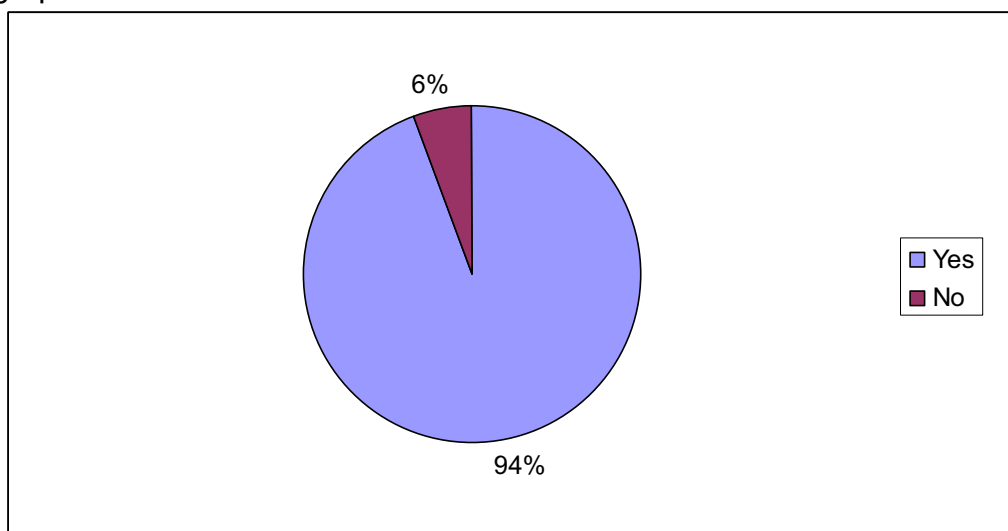
**• Overarching summary:**

- 24% of respondents believe that the HWRC at Church Marshes should be replaced with a new facility in a more accessible location.
- Further analysis reveals that of those respondents that use Church Marshes HWRC, just 40% believe it should be replaced with a new facility.
- The main reasons that people answered 'no' to replacing Church Marshes with a new facility in a more accessible location are:
  - Respondents are happy with Church Marshes as it is
  - Many respondents are concerned that this will result in the closure of Sheerness/ Faversham HWRC
  - Some respondents feel there is not enough information provided on where the new site would be
- Stakeholder comments included:
  - Maidstone BC support relocation of HWRC and Transfer station to reduce congestion and access are improved
  - May deter flytipping
  - Would reduce vehicle emissions
  - Care to identify location which doesn't impact environmentally sensitive land

**7.10 Do you support the provision of an additional Household Waste Recycling Centre in the Tonbridge and Malling area, which is currently not covered by the existing network? (Question 20)**



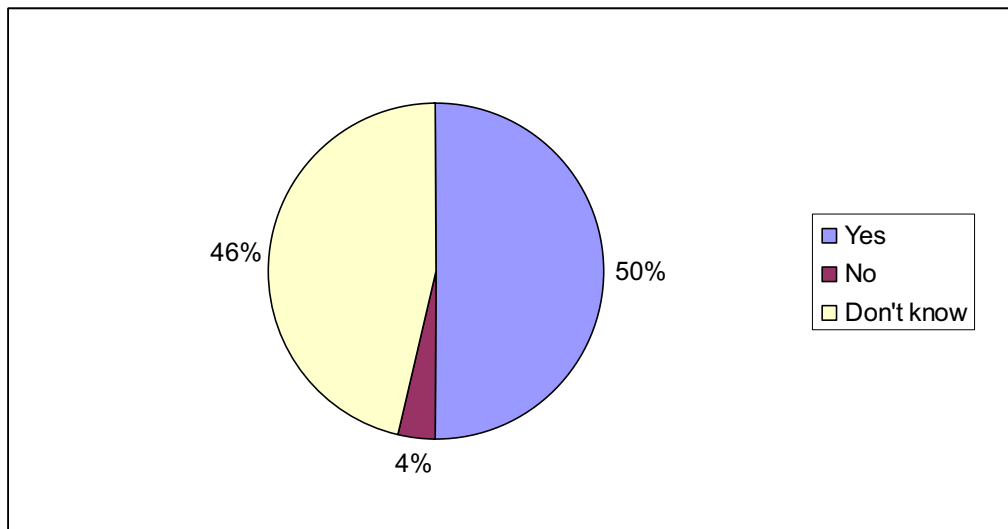
The graph below excludes those that answered 'don't know'



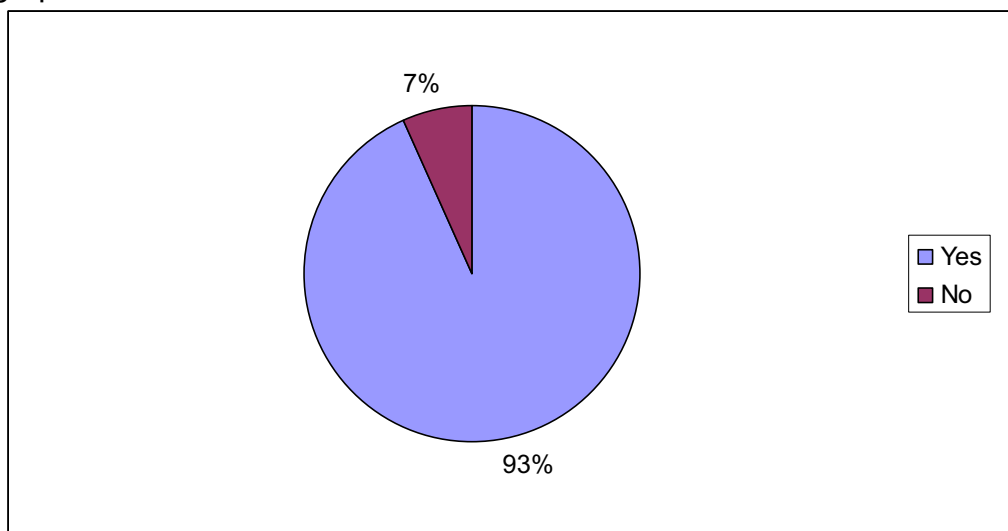
**• Overarching summary:**

- 52% of respondents support the provision of an additional HWRC in the Tonbridge and Malling area.
- Stakeholder comments include:
  - Widespread from organisations for a HWRC in the area
  - Improving access to existing sites should be considered before building new HWRCs
  - Recognised over-crowding at some existing sites e.g. Tovil
  - High level of illegal waste sites in mid Kent
  - EA support for HWRC development in Staplehurst / Headcorn area
  - “Additional sites should be considered on journey time and not differentiated by district boundaries”
  - “It is no coincidence that the mid Kent area, where there is no HWRC, has the highest number of illegal waste sites”

**7.11 Do you support the upgrading of the existing Household Waste Recycling Centre at Ashford, which forms part of the proposal for a new waste transfer station (which bulks household waste for haulage to reprocessors)? (Question 21)**



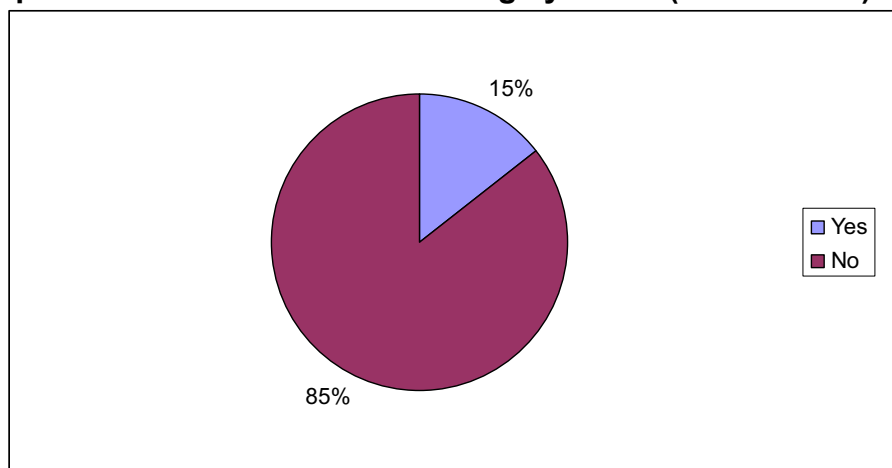
The graph below excludes those that answered 'don't know'



**• Overarching summary:**

- 50% of respondents would support an upgrading of the existing HWRC at Ashford.
- Further analysis reveals that of those respondents that use Ashford HWRC, 88% support the upgrading of the site.
- Stakeholders demonstrated support for upgrading of HWRC and provision of new transfer station.

**7.12 If you do not use a Kent Household Waste Recycling Centre, are there any improvements that would encourage you to? (Question 22)**



It is important to be aware that although this question is directed at people who currently don't use the HWRCs, a number of people who answered this question ARE current HWRC users.

**• Customer response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Local facilities - want a site on my doorstep	37	19	56	1
Extend range of materials accepted	21	19	40	2
Improve site accessibility and safety e.g. no steps, low access to containers	15	11	26	3
Consistency of service provided at HWRCs	5	3	8	4
Shorter queues	3	3	6	
Extended opening hours	7	2	9	
Allow over height domestic vehicles	6	1	7	
Wish to purchase recycled products e.g. compost	9	1	10	
Access for pedestrians	4	7	11	
More helpful site staff	5	2	7	
Improved signage	3	1	4	
Greater access to HWRC information prior to visit	2	2	4	
Reassure me that the materials are recycled	2	2	4	
<b>TOTAL</b>				

**• Overarching summary:**

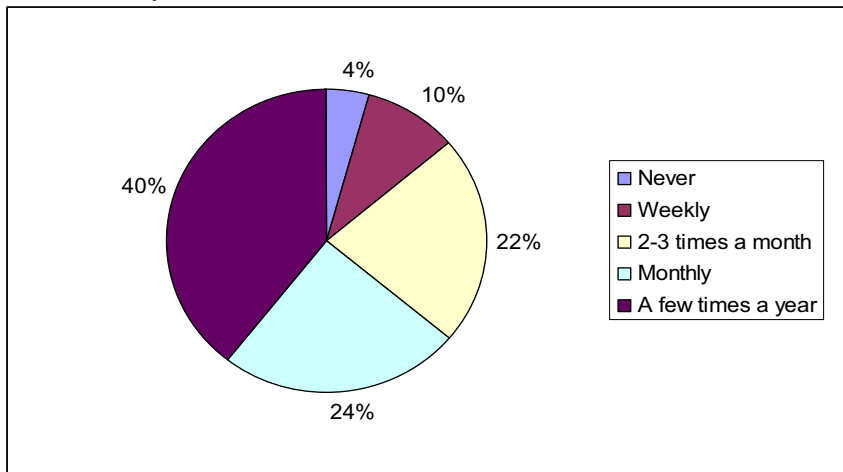
- The main suggested improvements include:
  - Many want on-site shops to buy things that are still in good condition
  - Many want to be able to recycle more things especially plastics
  - A facility closer to home/ more sites
  - Allow over height vehicles
  - More helpful staff
  - More help with carrying heavy items
  - Better/ more parking on site
  - Mobile collections from home for elderly and people without a car
  - Increase the opening hours
  - Improve the ease of access
  - No steps
- Many commented that there wasn't the opportunity in the questionnaire to suggest improvements for those that already use the HWRCs.

## 7.13 Other miscellaneous notable comments

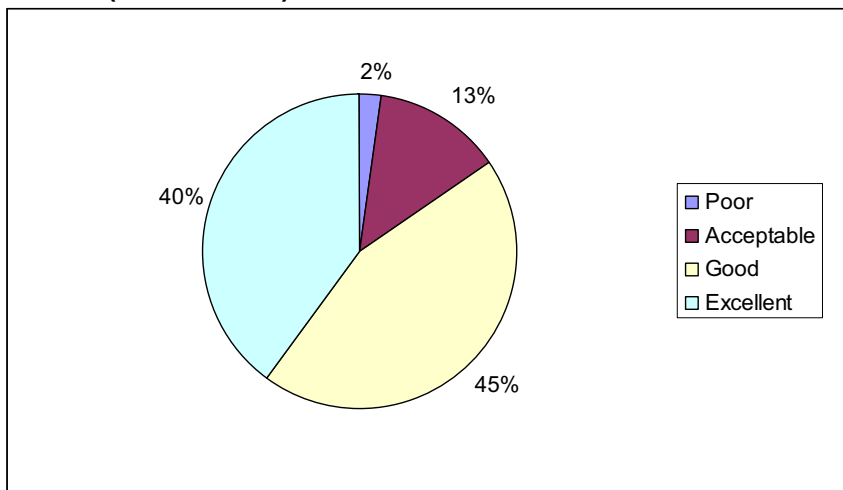
Stakeholder key comments	Customer key comments
<ul style="list-style-type: none"> <li>• Do not support the reduction and accessibility of the service as a way of preventing trade waste.</li> <li>• Increased cost to districts for removal of fly tipped waste or materials presented kerbside for collection, therefore, no overall saving to public purse.</li> <li>• Questions are somewhat misleading e.g. sites are out of data and expensive to run</li> <li>• Gaining income from trade waste disposal will be more economically effective than attempting to cut costs from excluding non-householder waste”</li> <li>• Lack of understanding by businesses as to how to legally dispose of waste should be tackled before making further attempts to ban them from HWRCs.</li> <li>• Measures need to be put into place to monitor levels of fly tipping if policies are implemented.</li> <li>• Proposals should be deferred until presented to Locality Boards.</li> <li>• KCC should undertake further consultation on each local site and provide further detailed analysis.</li> <li>• Short / no queues are important to people.</li> <li>• Limitations on waste are too severe.</li> </ul>	<ul style="list-style-type: none"> <li>• The sites were built when they accepted just one product: waste. To be fit for purpose for the 21st century means having the space and infrastructure to separate items so that materials can be re-used or recycled. That means the Council has to have a programme of modernisation. It also means that residents shouldn't have a 'postcode lottery' on what is available to them in their local areas. The site at Pepperhill should be the goal for all residents to have access to, not just a few.</li> <li>• If the height barrier were not opened for them you are excluding the very people that pay taxes towards this service.</li> <li>• Normal householders who cannot afford to pay for the council collection often ask for friends or family with large vehicles to take large items to the tip for them. This would discriminate against people on low income or the elderly.</li> <li>• Because I need to dispose of waste for my business.</li> <li>• Because experience shows that if you restrict either collection/recycling or civic amenity sites you get fly tipping which costs considerably more to clean up. This is a short term saving leading to long term increased expenditure</li> </ul>
Stakeholder sound bites	Customer sound bites
<p>“Should be emphasising opportunities to recycle not reducing them”</p> <p>“The Council should aim to increase income by maximising diversion of all waste”</p> <p>“If profit is available from waste then it should be the business of KCC to chase it, even if trade waste is available to turn into profit”</p>	<p>“The money spent on developing the new site is offset by the cost saving associated with reduced fly tipping.”</p>

## 8 CONSULTATION RESPONSES: CURRENT SERVICE PROVISION

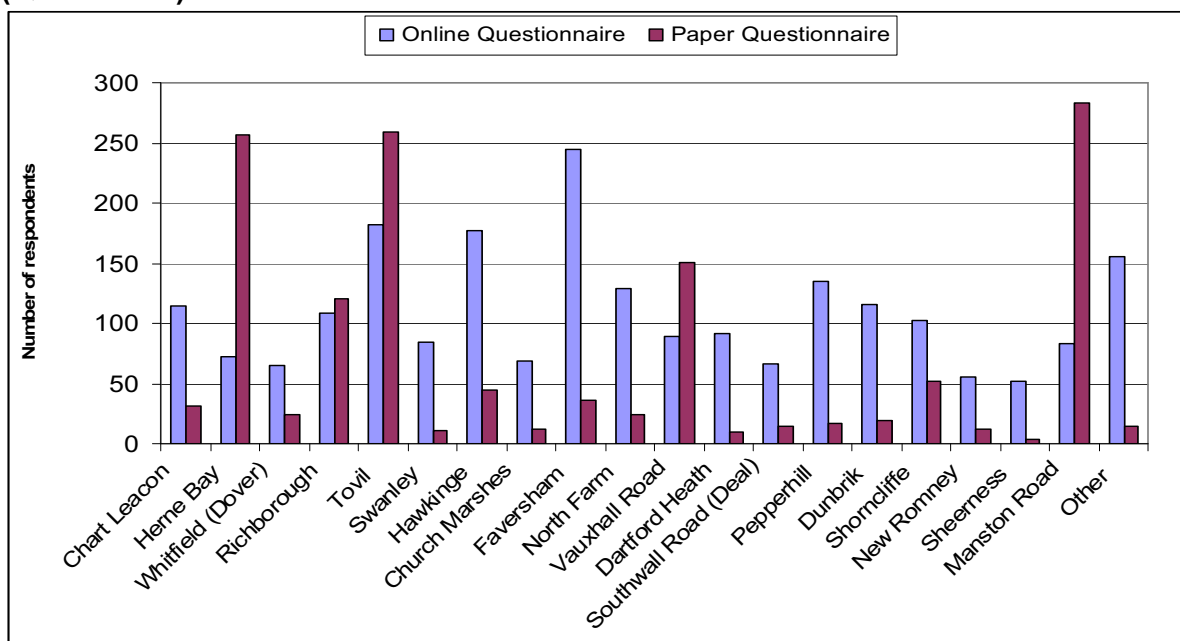
### 8.3 How often do you visit a Kent County Council Household Waste Recycling Centre? (Question 1)



### 8.4 How do you rate the current service provided at your local Household Waste Recycling Centre? (Question 2)

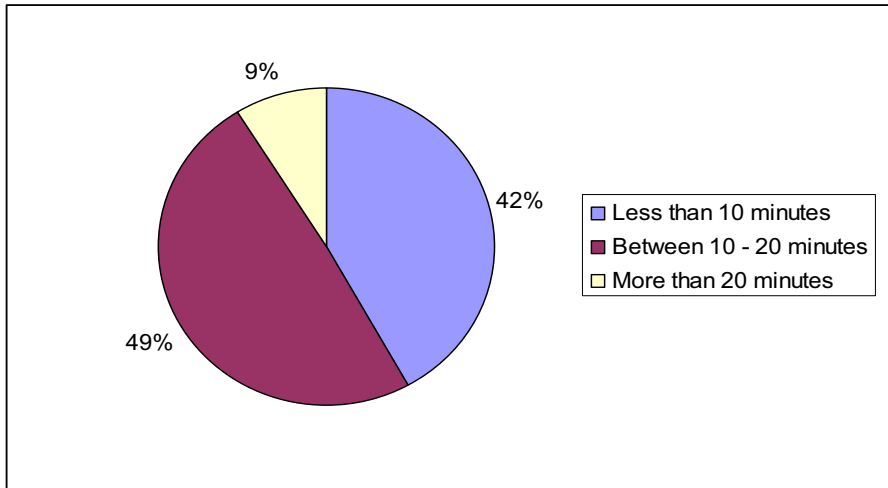


### 8.5 Which Household Waste Recycling Centre(s) do you use most often? (Question 3)

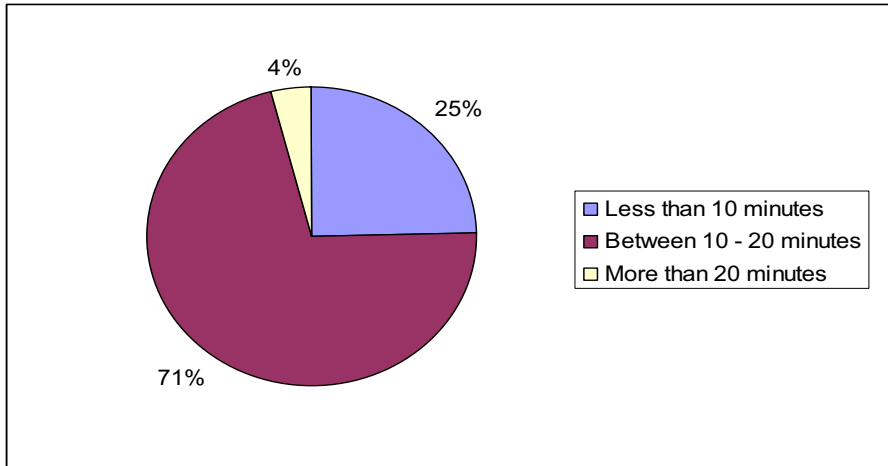


\* Please note: these numbers will be influenced by comparisons that have occurred in different areas of Kent

**8.6 How long does it take to get to your nearest Household Waste Recycling Centre from your home? (Question 4)**

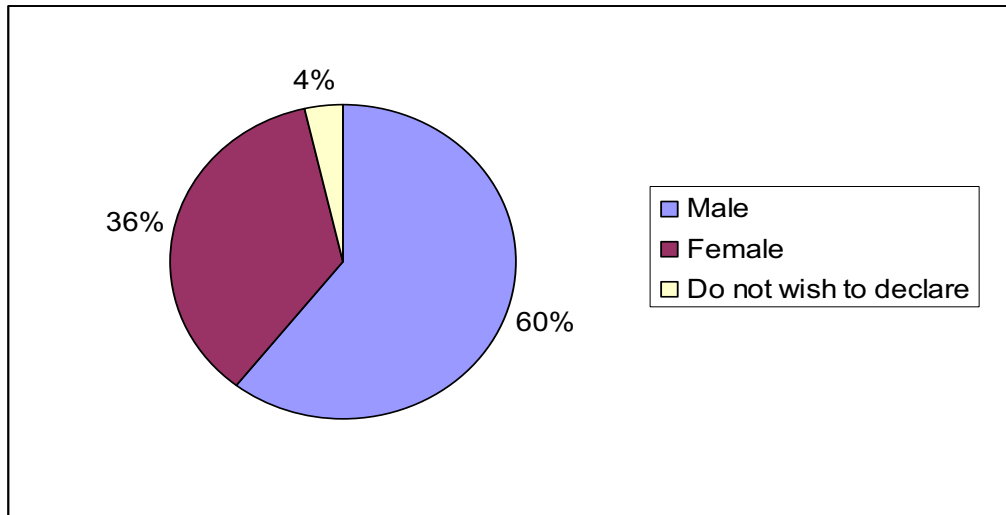


**8.7 What do you think is a reasonable drive time to a Household Waste Recycling Centre? (Question 5)**

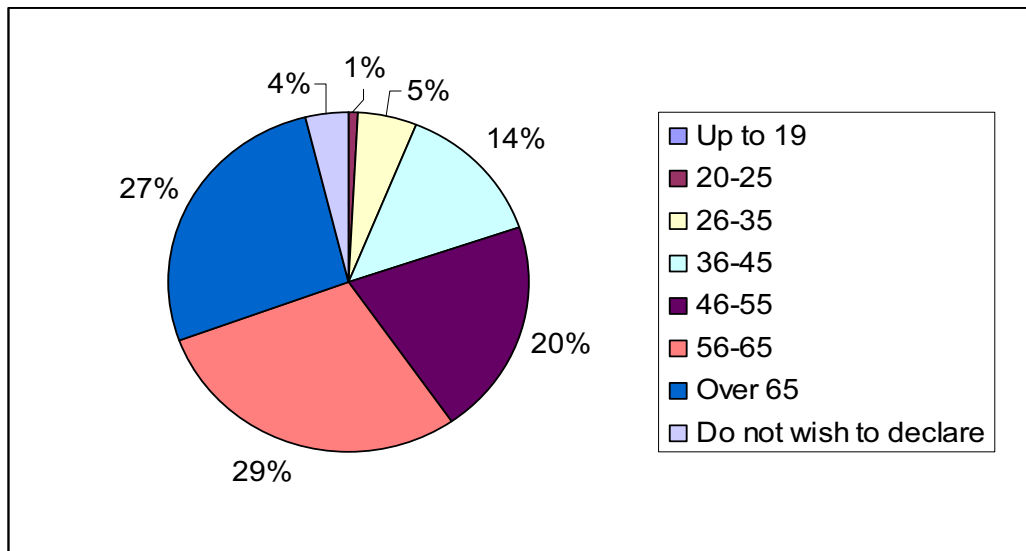


## 9 CONSULTATION RESPONSES: "ABOUT YOU"

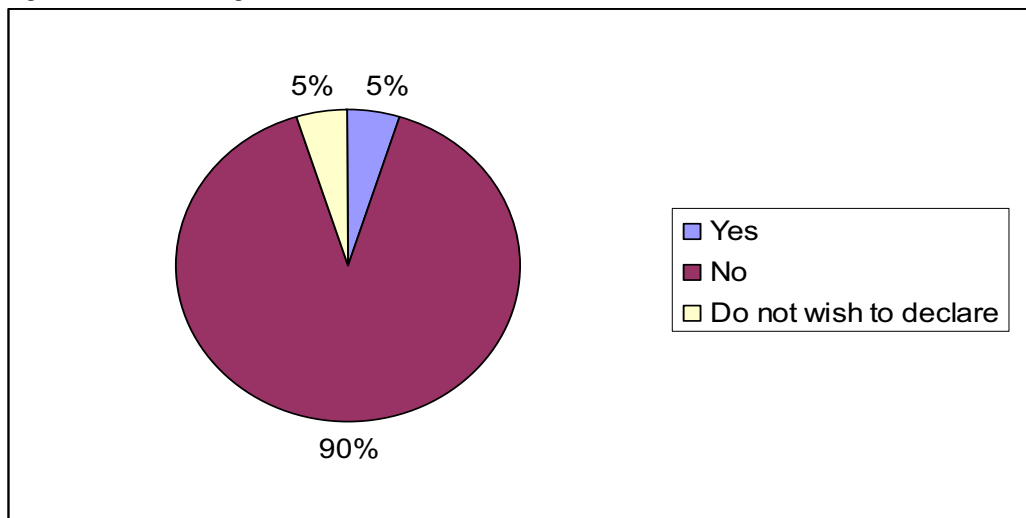
### 9.3 Gender



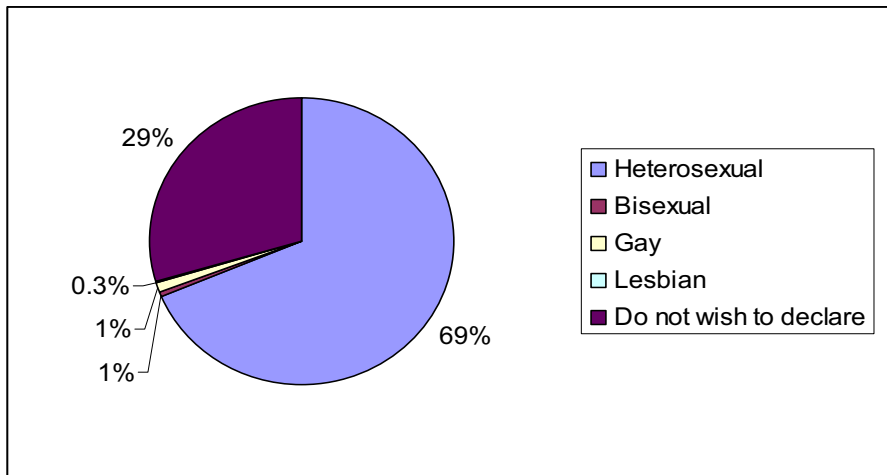
### 9.4 Age range



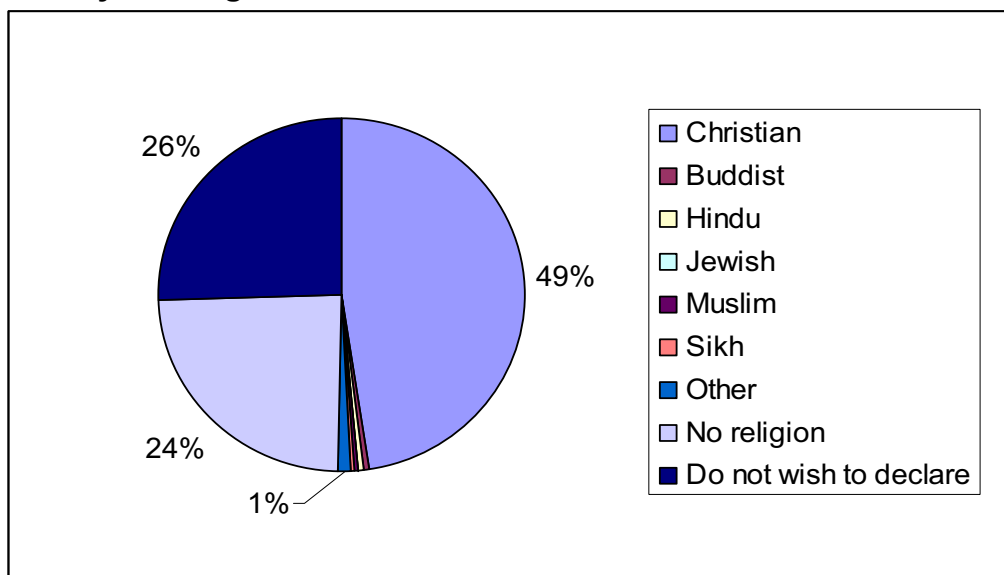
### 9.5 Do you consider yourself to be disabled?



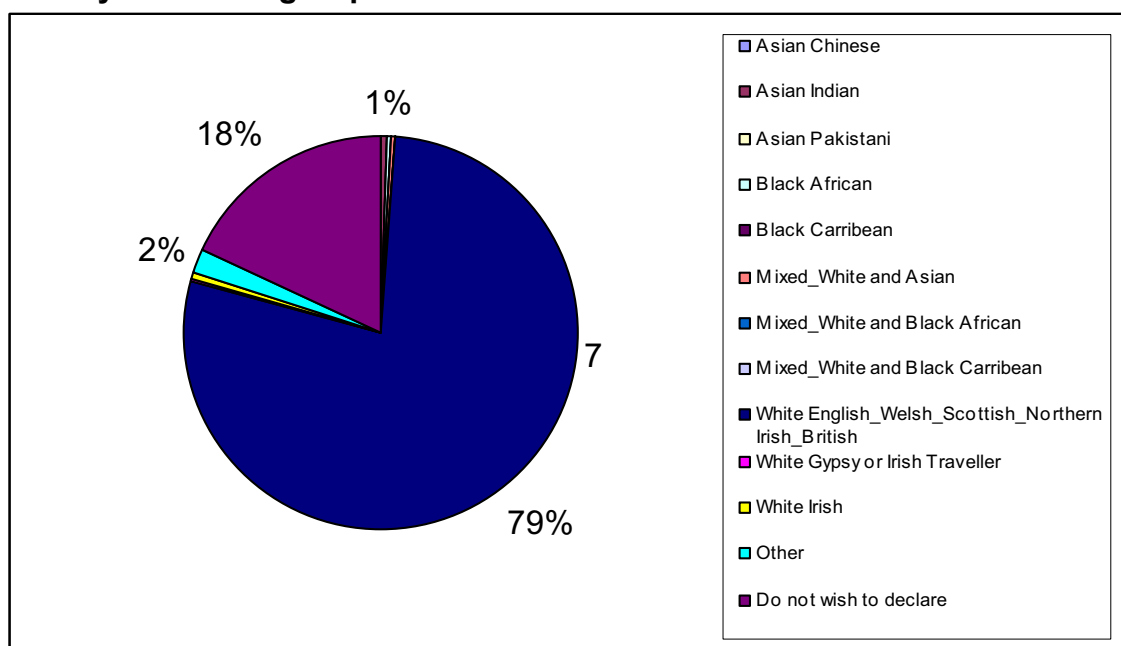
### 9.6 What is your sexual orientation?



### 9.7 What is your religion / beliefs?



### 9.8 What is your ethnic group?



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## 10 POST CONSULTATION

Recommendations were presented to Cabinet on 19<sup>th</sup> March 2012 for consideration which took into account the feedback obtained from the public consultation and the full EIA. You can view the [Cabinet paper](#).

Cabinet endorsed all recommendations and delegated the final decision to the Cabinet Member for Environment, Highways and Waste.

A petition was received in respect of the proposal to close the Richborough HWRC. This was debated at the meeting of the County Council on Thursday 29<sup>th</sup> March 2012.

The Cabinet Member made his decision on 3<sup>rd</sup> April 2012 and a full copy of this can be found on our [website](#).

Operational policy changes at HWRCs will be implemented during the summer of 2012, with extensive customer engagement to inform and support customers.

# **EQUALITY IMPACT ASSESSMENTS**

**KENT HOUSEHOLD WASTE  
RECYCLING CENTRES**

**May 2011- February 2012**



**KENT COUNTY COUNCIL**  
**EQUALITY IMPACT ASSESSMENT**

**Directorate: Enterprise and Environment**

**Name of policy, procedure, project or service**

Household Waste Recycling Centre (HWRC) Review

**Type**

*What are you impact assessing, a policy procedure or service?*

The Household Waste Recycling Centre service and its operating policies

**Responsible Owner/ Senior Officer**

*Provide the name of the senior officer or manager responsible for the policy, procedure, project or service*

Caroline Arnold, Head of Waste Management

**Date of Screenings:**

<b>A: Initial screening:</b>	Thursday 18 <sup>th</sup> May 2011	Pages 3 - 9
<b>B: Interim screening:</b>	Tuesday 13 <sup>th</sup> September 2011	Pages 10 - 15
<b>C: Final screening:</b>	Thursday 16 <sup>th</sup> February 2012	Pages 16 - 24

**A: Initial EIA conducted at start of HWRC Review process (May 2011) – prior to development of proposed policies**

**Screening Grid:**

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Age</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.
<b>Disability</b>	Yes		Unknown	Unknown	Consideration may need to be given to journey times, physical access to site and use of containers. Further assessment will be required once the proposals to HWRC services are known.
<b>Gender</b>	No		None	None	Consideration may need to be given to journey times, physical access to site and use of containers. Enforcing exclusion of trade waste users has the potential to ease site congestion improving manoeuvrability.
<b>Gender identity</b>	No		None	None	
<b>Race</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known. Mosaic analysis to be used to determine composition of population to identify dominant languages of minority groups.
<b>Religion or belief</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.

						Research to understand religious festivals and cultural needs of people living in areas with proposed changes in service.
<b>Sexual orientation</b>	No		None	None	None	
<b>Pregnancy and maternity</b>	Yes		Unknown	Unknown	Unknown	Further assessment will be required once the details of changes to HWRC services are known.
<b>Marriage and civil partnership</b>	No		None	None	None	

## **Part 1: INITIAL SCREENING (May 2011)**

### **Context**

Kent County Council has the statutory responsibility to manage the disposal of municipal waste in Kent. As part of this, the service runs 19 Household Waste Recycling Centres (HWRC) where householders can bring a variety of municipal waste for recycling and disposal. This service has been under scrutiny for some time and a review has been commissioned to examine the shape of future operations to and any efficiency savings.

### **Aims and Objectives**

The aim of the review is to identify the right level of HWRC service for Kent residents at the right cost. The review will include an assessment of the HWRC network in terms of economy (costs and income generation), efficiency (productivity), effectiveness (customer satisfaction, recycling rates, material types and capture) and location.

The review will examine the current provision and location of HWRCs, their operating policies, the potential for increasing income, as well as the options for making the required savings.

### **Beneficiaries**

The intended beneficiaries are householders as users of the Household Waste Recycling Centre service in Kent. A review of HWRC service provision will examine a range of policies. These policies will seek to provide appropriate HWRC services for householders whilst yielding savings.

### **Consultation and data**

In order to understand the customer base currently using the HWRC service, data is to be sourced and collated through the website and face to face surveys at all HWRCs and conducted by KCC Waste Service Officers (WSO). To ensure statistical validity, a threshold has been set requiring a minimum of 200 surveys per site per year, equalling a minimum of 3,800 surveys across the customer base.

### **Potential Impact**

This Equality Impact Assessment (EIA) is an initial screening to indicate potential areas of impact, both positive and negative, to the diverse population of Kent, should any new policy changes be implemented.

Currently five of the Protected Characteristics may potentially be impacted either positively or negatively and will require further research when service delivery models are proposed by Members. This EIA will then be developed to detail the nature of the positive and negative impacts and mitigations.

<b>JUDGEMENT</b>
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**Option 1 – Screening Sufficient** **NO**

**Option 2 – Internal Action Required** **YES**

There is potential for adverse impact on particular groups should service changes be proposed and implemented (see action plan1).

An interim EIA (pages 10 -15) will be conducted once Members have agreed the proposed policy / service changes.

This initial EIA screening has demonstrated the value that further data would bring to inform the interim and full EIAs. This data will be used in conjunction with Mosaic’s Kent and Medway segments and afford wider visibility of the equality impacts.

Of particular note is the need to undertake a period of public consultation to gain a better understanding of the impacts that these changes may have on Kent householders.

Whilst the Informal Member Group continues with their review of the HWRC Service, Action Plan 1 (pages 7- 8) will be completed to provide the necessary information to inform the interim EIA and the development and delivery of a public consultation.

**Option 3 – Full Impact Assessment** **NO**

*Only go to full impact assessment if an adverse impact has been identified that will need to undertake further analysis, consultation and action*

Option 3 will be conducted within the interim EIA (page 10) and re-assessed following public consultation / full EIA (page 16).

**Action Plan 1- Initial Equality Impact Assessment (May 2011)**


<b>Protected Characteristic</b>	<b>Issues identified</b>	<b>Action to be taken</b>	<b>Expected outcomes</b>	<b>Owner</b>	<b>Timescale</b>	<b>Cost implications</b>
<b>AGE</b>	<p>Further customer insight of age composition of HWRC service users required.</p> <p>Methods of engagement for public consultation may not suit all adults that form our customer base.</p> <p>Identify key groups to consult with.</p>	<p>Sample of customer postcodes to be collected with Mosaic profiling to provide customer segmentation.</p> <p>Use Mosaic data to develop appropriate engagement channels which suit preferences across age ranges – not a one size fits all approach.</p>	<p>To provide customer insight – identify indicative age composition of HWRC service users.</p> <p>To effectively engage with a cross section of ages of adults within the consultation.</p>	Caroline Arnold	September 2011	Achievable through existing resources.
<b>DISABILITY</b>	<p>Accessibility of public consultation documents.</p> <p>Identify key groups to consult with.</p> <p>Consider accessibility to service information for people with print impairments.</p>	<p>Ensure alternative formats are available including Easy Read; helpline number provided; Plain English applied to materials published.</p> <p>Consider use of Talking Newspapers and radio to communicate service information.</p>	<p>Public consultation accessible by all adults.</p> <p>Feedback / lessons learnt from consultation shared within Kent County Council to ensure high quality consultations are delivered to customers.</p> <p>Increase awareness of the HWRC service.</p>	Caroline Arnold	October 2011	TBC

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
<b>RACE &amp; RELIGION OR BELIEF</b>	<p>KCC engagement with minority groups to obtain service feedback.</p> <p>Understanding of minority groups' usage of HWRC services.</p> <p>Identify key groups to consult with.</p>	<p>Equality /diversity training for officers who are required to conduct face to face customer satisfaction surveys at HWRCs.</p> <p>Provide officers with KCC's 'Race, Faith and Culture' toolkit as a reference guide.</p> <p>Sample of customer postcodes to be collected with Mosaic profiling to provide customer segmentation.</p>	<p>To equip officers with appropriate skills, knowledge and understanding, to effectively engage with customers from different cultures and from minority groups, to obtain feedback respectfully and with confidence.</p> <p>To provide customer insight; indicate service use by minority groups.</p>	Caroline Arnold	September 2011	<p>£700 for external trainer.</p> <p>Remaining actions achievable through existing resources.</p>
<b>PREGNANCY OR MATERNITY</b>	<p>To identify areas of Kent where pregnancy and maternity may be more prevalent and / or concentrated and sensible to ensure public consultation is well communicated.</p>	<p>Audience segmentation to understand where HWRCs may have higher than average levels of customers who are pregnant and/ or with small children.</p> <p>Mosaic profiling of customer sample to examine communication preferences for parents who are pregnant and / or have small children.</p>	<p>Inform delivery of public consultation to ensure feedback is gained from those within protected characteristic group.</p> <p>Communication methods selected meet needs and support effective engagement for public consultation.</p>	Caroline Arnold	September 2011	Achievable through existing resources.

## Initial EIA - Sign Off

*I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.*

### Senior Officer

Signed:   
Date: 18<sup>th</sup> May 2011  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### Directorate Equality Lead

Signed:  
Date:  
Name:  
Job Title:

## **B: Interim EIA conducted prior to public consultation of HWRC Policy / service changes (September 2011)**

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### **FULL ASSESSMENT:**

#### **1. Scope of the Assessment**

This assessment sets out to understand more fully, the potential impacts that may result from the proposed policy changes to the HWRC service to householders wishing to dispose of or recycle household waste.

- Stop accepting tyres, gas bottles and asbestos
- Limit building waste to 2 x 30 litre sacks per car
- Stop opening the height barrier except on Saturdays
- Exclude all vans, pick-ups, flat bed vehicles, over-sized recreational vehicles and trailers
- Consider the introduction of a permit scheme for residents in areas bordering other counties
- Close Hawkinge HWRC summer 2013
- Close Richborough HWRC summer 2013

#### **2. Information and data**

The initial screening highlighted improvements that could be made to data and subsequently knowledge about our customers and the potential impacts of service changes upon them. The tasks set out in Action Plan 1 (pages 7-8) have provided valuable information to inform a full EIA assessment prior to public consultation.

*Please note a further EIA (C) will be conducted once the public consultation has been completed.*

#### **HWRC Customer insight:**

Customer insight information has allowed KCC to understand the current customer base for the HWRC service and has also highlighted characteristics of those who are less likely to be service users:

- Those without access to a vehicle
- Elderly and younger people
- Ethnicity – English may not be first language
- Adults who have children and may be a single parent (or have nobody to leave children with do not want to take them to HWRC)
- Householders with no gardens and who have their waste management needs met by kerbside collection schemes
- Transient populations where they are not requiring the service due to limited stay in Kent.

Clearly communities are diverse so you will find pregnant, elderly, disabled people and ethnic minority groups across Kent, however, there are areas where some of these characteristics are more prevalent. This has been considered within this EIA and in

planning the public consultation to ensure proportionate access to information and opportunity to respond to proposals.

### **3. Involvement and Engagement**

Drawing upon data collated and information available to KCC, a consultation engagement plan has been produced to ensure accessibility to the consultation by Kent residents.

Communications have been tailored for householders to factor in elements such as how certain groups of people prefer to be communicated with.

The public consultation will use the following communication channels. Collectively, these will ensure strong coverage across the county for all residents.

- HWRC site signage
- Information handed to HWRC customers at all 19 HWRCs
- Consultation questionnaire posted to sample of householders who are receptive to direct mail
- Postcard signposting consultation online, posted to a sample of householders who are receptive to direct mail and are Internet users
- Gateway information screens across Kent
- Information available at sport clubs, gyms to reach a section of the current customer base
- Press advertisement in leading Kent press titles across Kent
- Older people's forums
- Disability groups / organisation
- Religious networks
- Minority groups – Gypsy and Irish Travellers
- KCC Community engagement officers local contact
- Posters in community facilities e.g. schools, village halls
- KCC web site
- Information to all parish / town councils

**Repeat Screening Grid: Interim EIA (September 2011)**

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Age</b> age 88	Yes		Low	Low	Customer information and KCC data has identified HWRCs where service users are likely to have a higher level of older residents than the Kent average. The consultation will ensure that these people are targeted proportionately and appropriately to engage in the process and obtain feedback.  Consideration has been given to waiting times, which may positively impact upon the more elderly customers. The proposed policies would seek to improve waiting times at HWRCs as a reduction in 'trade' vehicles entering the sites will ease congestion.  The proposed closure of Hawkinge <sup>1</sup> and Richborough <sup>2</sup> HWRCs – the nearest alternative HWRCs remain within a drive time of 10- 20 minutes which is equitable with other Kent residents.  There is likely to be a positive impact for those customers with disabilities where queuing negatively impacts upon them – by restricting 'trade' vehicles, throughput of vehicles will be reduced, resulting in a faster service for the residents. This should also increase manoeuvrability on site.
<b>Disability</b>	Yes		Low	Low	

<sup>1</sup> Drive times for residents in the Hawkinge area will not exceed the 20 minute standard if the site is to close.

<sup>2</sup> The population predicted to be effected by the potential closure of Richborough HWRC amounts to approximately 150 households which equates to 0.02% of Kent residents. These households exhibit the following characteristics: Middle aged people living in rural areas with young teenagers; some older people but active; Low ethnic diversity; Very likely to own vehicle (more than one).

						<p>A low negative impact may be experienced by those who use the Richborough HWRC, as some may need to drive a little further to access the next nearest site. The drive times to the nearest site will not discriminate residents living in the Richborough area, as alternative HWRCs are available within a drive time equitable with other Kent residents.</p> <p>Arrangements will be put in place to cater for residents using adapted vehicles which are over height and require the height barrier to be opened.</p>
<b>Gender</b>	No		None	None	None	
<b>Gender identity</b>	No		None	None	None	
<b>Race</b> Page 89	Yes		None	Low	<p>Mosaic analysis tells us that ethnic minorities are unlikely to be HWRC service users currently.</p> <p>Mosaic analysis has been used to determine the composition of the Kent population to identify dominant languages of minority groups in relation to HWRC locations. This will be catered for within the public consultation.</p>	
<b>Religion or belief</b>	No		None	None	<p>Information has been gained to understand implication of religious festivals and cultural needs of people living in areas with proposed changes in service. As the proposed policies do not alter the time / days that the service is provided, a negative impact has not been assessed.</p>	
<b>Sexual orientation</b>	No		None	None		


<p><b>Pregnancy and maternity</b></p>	<p>Yes</p>		<p>Low</p>	<p>Low</p>	<p>Population profile data has been used to identify areas where pregnancy and maternity may be higher than the Kent average, as well as communication preferences.</p> <p>There is likely to be a positive impact where queuing negatively impacts upon them – by restricting ‘trade’ vehicles, throughput of vehicles will be reduced, resulting in a faster service for the residents.</p> <p>A low negative impact may be experienced by those who currently use the Richborough and Hawkinge HWRCs, as some may need to drive a little further to access the next nearest site. The drive times to the nearest site will not discriminate residents living in the Richborough area, as alternative HWRCs are available within a drive time equitable with other Kent residents (please see footnote on page 12).</p>
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## 4. JUDGEMENT

### Interim EIA - Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

### Senior Officer

Signed:   
Date: 13<sup>th</sup> September 2011  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### Directorate Equality Lead

Signed:  
Date:  
Name:  
Job Title

## C: Part 2 - FULL ASSESSMENT (February 2012)

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**Name:** Household Waste Recycling Centre (HWRC) Review.

**Responsible Owner/ Senior Officer:** Caroline Arnold, Head of Waste Management

**Date of Full Equality Impact Assessment:** 16<sup>th</sup> February 2012

### Scope of the Assessment:

- To review the public consultation responses (following a 10-week consultation period), where a range of new policies for the future operation of the HWRC network were proposed
- To re-evaluate the impacts (positive and negative) on the Protected Characteristics in light of the consultation feedback and identify actions to prevent / limit negative impacts.

### Information and Data

#### Key information / data used in this assessment include:

- Qualitative feedback from public consultation in relation to protected characteristics:
  - Customer views on proposed policies
  - Waste Management stakeholder views e.g. District Councils
  - From public bodies e.g. Parish Councils
  - Community stakeholders e.g. CPRE
- Quantitative feedback from public consultation in relation to protected characteristics:
  - Customer views on proposed policies
- Statistical information about the consultation in relation to protected characteristics:
  - Response rates
  - Diversity of respondents\*
  - Gender and age\*
  - Mosaic analysis of respondents set against Kent population data relating to Protected Characteristics

*\* Where respondents provided this information*

### Involvement and Engagement

Please refer to appendix i – “Household Waste Recycling Centre public consultation delivery” (page 26) which provides comprehensive information concerning the involvement and engagement activity surrounding the review of the HWRC service.

## **Judgement**

The public consultation responses did not reveal any further impacts (negative or positive) upon any of the protected characteristics, which had not already been identified within the initial screening and interim EIA.

## **Action Plan**

The action plan prepared in May 2011 as part of the initial EIA has been fully delivered. Evidence and outcomes of this delivery is provided in table 3 on page 18.

A further action plan (page 21) has been prepared to reflect the potential impacts should Members adopt some, or all of the policies proposed in the HWRC review.

## **Monitoring and Review**

The proposed policies for the HWRC service will be presented to KCC Cabinet on 19<sup>th</sup> March 2012, where a decision will be made to implement, reject or amend each policy.

**Table 3: Record of consultation engagement mechanisms with residents likely to exhibit protected characteristics and response.**

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
<p><b>Age</b></p>	<ul style="list-style-type: none"> <li>Proactive targeting of older residents / HWRC customers (group 1) by direct mail (consultation questionnaire) in the Canterbury, Maidstone and Thanet districts, where proportion of elderly residents is the greatest.</li> <li>Direct mail was up weighted in Ramsgate, Sandwich and Folkestone areas (due to proposed local HWRC closures), to provide enhanced opportunity to engage.</li> <li>A further direct mail (information postcard) was sent to older people (group 2) in the Maidstone, Sevenoaks, Tunbridge Wells, Tonbridge and Mailing and Dartford districts – where they are receptive to direct mail and utilise the Internet. This is a separate group of people to those described in Group 1 which have been identified through Mosaic.</li> <li>Kent wide press advertising provided an engagement opportunity for the most elderly communities in Kent, who are known to be high consumers of local press titles.</li> <li>In addition, sporting groups such as bowls clubs were provided with consultation information, as it is recognised that this sport attracts an older player.</li> <li>Information was sent to Older People Forums and associated groups across all 12 districts.</li> <li>Large print format made available for people with visual impairments.</li> </ul>	<ul style="list-style-type: none"> <li>Direct mail was selected for older population (group 1) as their preferred communication channel. This audience are unlikely to have access and use the Internet and, therefore, unable to complete an online questionnaire.</li> <li>The targeted engagement achieved a 47% response rate to the consultation questionnaire sent.</li> <li>27% of respondents indicating their age were 65 years and over.</li> </ul>

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
<b>Disability</b>	<ul style="list-style-type: none"> <li>A range of alternative formats for the consultation questionnaires was provided to cater for diverse needs.</li> <li>Information was sent to a range of disability groups across Kent.</li> <li>Information was sent to all KCC Staff Groups for equality and diversity.</li> </ul>	<ul style="list-style-type: none"> <li>Large print format - 2 requests</li> <li>Easy Read – 1 requests</li> <li>Plain English – used throughout the materials</li> <li>Braille format - no requests</li> <li>Verbal presentation of questionnaire – 4 requests</li> <li>Audio format – made available online</li> <li>5% of respondents reported to have a disability</li> </ul>
<b>Gender</b>	N/A	60 % of respondents were male / 36% female
<b>Gender-identity</b>	N/A	N/A
<b>Race</b>	<ul style="list-style-type: none"> <li>A direct mail (information postcard) was sent to Mosaic groups more likely to include people from ethnically diverse backgrounds in the Canterbury, Dartford, Gravesham, Maidstone, Shepway, Thanet, Tunbridge Wells and Tonbridge and Malling districts.</li> <li>Questionnaire made available in alternative languages.</li> <li>Consultation sent to range of race / religion and minority groups.</li> <li>In addition, sporting groups such as football, cricket and gyms were provided with consultation information, as it is recognised that these sports and facilities attract users from ethnically diverse backgrounds.</li> </ul>	<ul style="list-style-type: none"> <li>Alternative languages – no requests</li> <li>Approximately 8.5% of respondents who provided a postcode belong to a Mosaic group more likely to include ethnically diverse people</li> <li>Respondents represented 11 ethnic groups</li> </ul>
<b>Religion or belief</b>	See details provided above in 'race' section.	Respondents represented 11 religions / beliefs
<b>Sexual orientation</b>	N/A	69% of respondents reported to be heterosexual; 1% gay; 1% bisexual; 29% did not wish to declare

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
<p><b>Pregnancy and maternity</b></p>	<ul style="list-style-type: none"> <li>• Information was displayed at all Kent libraries – people with young children are often users of library services.</li> <li>• Information was displayed and provided at all 9 Kent Gateways – residents more likely to be pregnant or who have young children are thought to be high users of Gateway services.</li> <li>• People with younger families are likely to be consumers of local newspapers. The consultation was advertised across all Kent leading press titles.</li> <li>• Football clubs were provided with consultation information as it is understood that people with young families are members.</li> </ul>	<ul style="list-style-type: none"> <li>• It is estimated that 14% of respondents have young children or are expecting a baby.</li> </ul>
<p><b>Marriage and civil partnership</b></p>	<p>N/A</p>	<p>N/A</p>

Final EIA Action Plan (February 2012)

This action plan has been developed to reflect the potential impacts should Members adopt some or all of the policies proposed in the HWRC review.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>AGE</b>	Change in operational HWRC policies following a Cabinet decision.	Communicate the outcome of the review and public consultation to older residents. Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with older customers.	Outcome of HWRC Review made available to older people. Implementation prepared and budget secured.	Head of Waste Management	April / May 2012 Waste Management (WM) budget – cost TBC
	Possible increase in journey distance and time for some residents who have been using Hawkinge <sup>3</sup> and Richborough HWRCs to date.	Provide comprehensive, targeted and timely communication to older people to support awareness of alternative HWRCs available to them in their locality. Ensure information about all council waste services is accessible to older people to provide them with choice for their waste disposal needs.	Older people receptive to communications delivered. Older residents able to dispose of their waste appropriately. Older people aware of alternative HWRCs and able to locate them easily.		From June 2012 Waste Management budget – cost TBC
	Decrease in journey time for residents in Tonbridge and Malling and north Maidstone areas with additional HWRC provided.	Advertising of new HWRC during build phase to inform potential service users of new facility. Promotion of the opening of the new HWRC to older people within the 'catchment' area.	Older people aware of new HWRC, the nature of the service and the location.		Subject to capital programme

<sup>3</sup> Remains within 20 minute drive time, equitable for residents elsewhere in east Kent.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
	Ensure older people are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately.	Ensure preferred communication channels are utilised to communicate with these target audiences, drawing on Mosaic information and local data.	Communication of key information is received by older people with ease.		To support all delivery. In accordance to the capital programme and existing site improvement plans.
<b>DISABILITY</b>	Change in operational HWRC policies following a Cabinet decision.	Communicate the outcome of the review and public consultation to organisations representing disability.  Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with customers who have disabilities.	Outcome of HWRC Review made available to residents with disabilities through representative organisations / groups in Kent.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012  Waste Management (WM) budget – cost TBC
	Cabinet approval for HWRC network infrastructure development and improvements, will enable accessibility to be enhanced.	Ensure accessibility for customers with disabilities is fully considered at design stage for new HWRCs and for site improvements at existing HWRCs.  Engage with disability groups within Kent to help inform new site design or improvements.  Communicate site improvements / design to communities representing disability.	Improved accessibility for customers with disabilities.	Head of Waste Management	To support all delivery. In accordance to the capital programme and existing site improvement plans.


Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
	Accessibility to site for customers with over-height adapted vehicles.	Develop procedure to ensure customers with over-height adapted vehicles are able to access HWRCs at their convenience and for KCC to communicate this appropriately to relevant customers.	Equitable access for customers with disability vehicles requiring entry to HWRCs.		Procedures developed April 2012 Customer engagement from May 2012
	Possible increase in journey distance and time to HWRCs, for some residents who have been using Hawkinge and Richborough HWRCs to date.	Provide comprehensive, targeted and timely communication to disability groups / organisations in Kent Or individuals upon request), to support awareness of alternative HWRCs available in the locality.  Distribute information about all council waste services to disability groups / organisations in Kent, so that people have choices as to how to dispose of their household waste.	Residents with disabilities able to dispose of their waste appropriately.  Residents with disabilities aware of alternative HWRCs and able to locate them easily.		From June 2012 Waste Management budget – cost TBC
<b>RACE</b>	Change in operational HWRC policies following a Cabinet decision.	Ensure that the outcome of the HWRC Review and public consultation is made available in alternative languages and appropriate formats for ethnically diverse residents of Kent.  Develop and deliver an implementation plan for introduction of new operational policies which provides for engagement with ethnically diverse customers.	Outcome of HWRC Review made available to organisations / groups representing ethnic groups in Kent.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012 Waste Management (WM) budget – cost TBC

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>PREGNANCY AND MATERNITY</b>	Change in operational HWRC policies following a Cabinet decision.	Communicate the outcome of the review and public consultation.  Develop and deliver an implementation plan for introduction of new operational policies – with regard to this protected characteristic HWRC site staff will continue to provide pregnant women with assistance for carrying and lifting waste materials, and ensuring children remain in vehicles for safety. Ensure that this is communicated sensitively in customer information.	Outcome of HWRC Review made available.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012  Waste Management (WM) budget – cost TBC
	Possible increase in journey distance and time for some residents who have been using Hawkinge and Richborough HWRCs to date.	Provide timely communication to support awareness of alternative HWRCs available in the locality.  Ensure information about all council waste services is accessible to residents to provide them with choice for their waste disposal needs.  To develop and implement monitoring tools.  To undertake regular reviews to analyse findings and take action where negative impacts are identified.	Pregnant women and / or those with young children are able to dispose of their waste appropriately.  Parents aware of alternative HWRCs and able to locate them easily.  Ensure accessibility to service for people previously identified at risk of being negatively impacted.		From June 2012  Waste Management budget – cost TBC
<b>ALL PROTECTED CHARACTERISTICS IDENTIFIED</b>	To monitor customer usage of HWRCs where policies are implemented & identify any further mitigating actions required to prevent & minimise impact upon customers exhibiting these protected characteristics.				Summer 2012-ongoing

## **FINAL EIA - Sign Off**

*I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.*

### **Senior Officer**

Signed:   
Date: 21/02/12  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### **Directorate Equality Lead**

Signed: Written approval provided via email on date below.  
Date: 21/02/12  
Name: Akua Agyepong  
Job Title: Corporate Lead Equality and Diversity

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## **APPENDIX i: Household Waste Recycling Centre public consultation delivery**

### **CONSULTATION ENGAGEMENT**

The policies proposed in the consultation have the potential to affect every household in Kent. It was therefore important to devise engagement mechanisms to provide the opportunity for participation equally across Kent communities, being mindful of communication preferences and accessibility of information.

The consultation consisted of a questionnaire, available in both electronic and paper formats. Kent residents were made aware of the consultation and invited to respond using various communication methods to ensure a broad range of target audiences were engaged with in a proportionate manner.

The EIA shaped the engagement and participation mechanisms, identifying protected characteristics which had the potential to be negatively impacted by the proposed policies, as well as ensuring that particular attention was paid to engagement with minority groups in Kent.

### ***MOSAIC ANALYSIS***

Mosaic, a customer segmentation tool, was used to understand the best way to engage with the residents in Kent. Within Kent, a bespoke Mosaic segmentation has been created using county specific data, whereby every postcode and household in Kent is classified as belonging to one of 69 types and 15 groups (Kent and Medway A – M). These groups identify clusters of individuals and households that are as similar as possible to each other, and as different as possible to any other group. They describe the residents of a postcode in terms of their typical demographics, their behaviours, their lifestyle characteristics and their attitudes. Mosaic was used in this instance to understand communication preferences to ensure that residents in Kent were informed about the consultation in a way that they are more likely to be receptive to.

In preparation for the consultation, a sample of postcodes for HWRC users were collated and profiled, to understand the make-up of the current customer base and their communication preferences. The profile of HWRC users was compared with the Mosaic profile of the Kent population as a whole, in order to understand those people more or less likely to use an HWRC user. This supported the development of targeted communication across all Mosaic groups to ensure a representative sample of Kent residents were engaged with.

The following communication approaches were developed and delivered based on Mosaic Analysis:

### ***Direct Mail***

Mosaic was used to identify those residents in Kent more likely to be receptive to direct mail as a communication method. In order to determine the content of the direct mail, likely use of the Internet was also established (i.e. promoting a website would be inappropriate if Internet use was low).

As a result, a paper copy of the consultation questionnaire was sent to a random sample of residents belonging to K&M groups which were likely to be responsive to direct mail but less likely to have access to the internet. Residents were informed on the covering letter that their address had been selected at random and asked them to encourage others to respond also.

A second direct mail which took the form of a postcard with key points about the consultation and how to participate was sent to a sample of Kent households which were likely to be receptive to direct mail, but also likely to have access to the internet. The postcard signposted residents to the online consultation questionnaire whilst also giving them the option to request a paper copy (or alternative formats) if they preferred.

In light of the questionnaire proposing the closure of Hawkinge and Richborough HWRCs, the direct mail was up-weighted in the areas near these two sites.

### ***Sports clubs/ societies***

Mosaic variables were used to understand which sports/ activities specific groups are likely to be interested in. As a result, posters were sent to sports clubs/ societies in Kent in specific areas based on the characteristics of the population in that area. For example, posters were sent to bowls clubs and golf clubs in area in Kent where there is known to be an older population and posters were sent to gyms where the communities are more likely to undertake this kind of activity.

## **OTHER COMMUNICATION APPROACHES**

### **KCC website**

A dedicated web page ([www.kent.gov.uk/hwrcconsultation](http://www.kent.gov.uk/hwrcconsultation)) was created on the KCC website to provide consultation information and access to the online questionnaire. Furthermore, links to this page were provided on every Waste Management page regarding the HWRCs. An email address was also created specifically for any email correspondence regarding the consultation ([hwrcconsultation@kent.gov.uk](mailto:hwrcconsultation@kent.gov.uk)).

### **Gateways**

Each of the 9 Kent Gateways were provided with a supply of postcards, posters and paper copies of the consultation questionnaire, in order to give Kent residents another route with which to obtain a questionnaire should they be Gateway users. Gateways with 'information screens' carried information about the consultation.

### **Libraries**

A poster advertising the consultation along with a number of postcards and paper copies of the questionnaire were provided to each of the 99 KCC Libraries and 11 KCC Mobile Libraries.

### **Engagement at HWRCs**

Whilst it remained important to ensure that those residents that do not currently use the HWRCs are made aware of the consultation, providing information at the sites themselves direct to service users was very important. A sign advertising the consultation was installed at each of the 19 HWRCs on the 1<sup>st</sup> or 2<sup>nd</sup> of December 2011 and displayed for the full 10 weeks.

Furthermore, between 1<sup>st</sup> December and 4<sup>th</sup> December 2011, Waste Management officers successfully handed 5,500 postcards to HWRC customers promoting the consultation across all 19 HWRCs. These were handed out during the weekdays and weekend to ensure that different audiences were engaged with and at the earliest opportunity within the consultation period.

### **Press ads**

Mosaic was able to provide an indication of which areas in Kent would be receptive to press advertisements as a communication method. However, it was felt that it would be

more reasonable to run county-wide advertising to achieve the greatest reach, equality of access and achieve greatest value for money. In the week commencing 28<sup>th</sup> November 2011, a press advertisement was placed in all Kent Messenger paid for titles in Kent, as well as Thanet Extra, Sittingbourne Extra and Messenger Extras (formerly Gravesend, Dartford & Swanley Extra) which are free titles (as no dominant paid for title exists in these areas). A press ad was also placed in the Tunbridge Wells Courier and Tonbridge Courier.

### ***KCC community engagement officers***

All 12 KCC Community Engagement Officers were sent an email prior the launch of the consultation to provide them with information should any members of their communities raise the subject at meetings or make an enquiry.

### ***Key stakeholders***

As well as communicating with individual residents of Kent, key stakeholders were also engaged with to encourage them to contribute to the consultation process. The following stakeholders were engaged with:

- All Kent parish and town councils were sent a paper copy of the questionnaire for the 1<sup>st</sup> December 2011 and were asked to make their residents aware of the consultation. Feedback was encouraged as individuals or as a combined response of the whole parish. Included within this was the Kent Association of Local Councils.
- Waste Managers from all 12 Kent district councils and Medway Council were provided with a paper and electronic copy of the questionnaire and encouraged to respond to proposals via email.
- The Environment Agency was provided with a paper copy of the questionnaire and encouraged to respond to proposals via email.
- A paper copy of the questionnaire was also sent to KCC waste contractors encouraging them to respond via email.
- Kent Fire and Rescue Service were also approached.

## **EQUALITY CONSIDERATIONS**

### ***Equality groups***

Kent County Council is committed to ensuring that current and potential service users will not be discriminated against on the grounds of their social circumstances or background, such as gender, race, colour, ethnic origin, religion or belief, disability, gender identity, sexual orientation or age. As a result, a letter and / or e-mail was sent to over 150 equalities groups across the county to inform them of the consultation and to ask them to circulate the information to members of their groups / communities. These groups were informed that responses were welcome from individuals or as a group/ organisation. The following groups were contacted:

- Age groups, including all age forums in Kent
- BME groups
- Disability groups
- Gender groups
- Refugee groups
- Religion groups
- Sexuality groups.

Furthermore, postcards were provided to influential members of the Gypsy and Irish Traveller communities to disseminate amongst their communities as it was felt that these had not been represented elsewhere.

All four KCC staff groups (Rainbow, Unite, Level Playing Field and Greenhouse) were sent an e-mail with the consultation information, again encouraging them to circulate the information to their members.

### ***Alternative formats***

Prior to the launch of the consultation, the consultation questionnaire was produced in alternative formats:

- Easy Read;
- Large Print;
- Audio format; and
- Braille.

Alternative language formats would have been accommodated if required, however, no requests were received.