

# **HOUSEHOLD WASTE RECYCLING CENTRES**

**Charging for non-household waste policy  
(soil, rubble, hardcore and plasterboard)**

## **PUBLIC CONSULTATION REPORT**

**November 2018**



## EXECUTIVE SUMMARY

*Summary of consultation responses:*

2,841 total responses, of which  
2,742 responses were from customers  
99 responses were from stakeholders

Summary of responses to the question 'To what extent do you agree or disagree with the proposal to charge for soil, rubble, hardcore and plasterboard?':

85% Disagree or strongly disagree  
11% Agree or strongly agree  
4% Neither agree nor disagree

An eight-week public consultation on the proposal to charge for waste classified as non-household (soil, rubble, hardcore and plasterboard) delivered to the Household Waste Recycling Centre (HWRC) service in Kent was run from 6<sup>th</sup> September to 1<sup>st</sup> November 2018.

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

The EqIA shaped the engagement and participation mechanisms, identifying protected characteristics which had the potential to be negatively or positively impacted by the proposed policies.

The consultation consisted of a consultation document and questionnaire, available in both electronic and paper formats, and included an Easy Read version. Also available were two supporting documents; a) frequently asked questions and b) a chargeable material/item document which listed waste materials with details of whether they are/proposed to be chargeable waste materials, accepted free of charge, or not accepted at HWRCs.

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.

The communication methods used included:

- Information distributed and displayed at HWRCs
- Customer engagement events at HWRCs
- KCC web site
- Key stakeholder engagement
- Social media
- Gateways
- Libraries
- Posters and point of sale information at DIY stores and Garden Centres
- Engagement with equalities groups
- Press release

A total of 2,841 consultation responses were received, consisting of:

- 2,669 customer online responses;
- 57 customer paper questionnaire responses, of which 2 were Easy Read versions; and 16 customer responses by letter or email
- 88 stakeholder online responses, 6 emails/letters and 5 paper responses – received from district councils, parish councils, waste management contractors and other agencies

Online responses were encouraged, however all communication channels provided opportunity to respond by paper copy.

Of the 62 paper copies received, 21 returned the printed consultation booklet, 36 downloaded and printed a paper version of the consultation questionnaire which was then submitted via the post and 5 emailed a copy of the consultation booklet.

In addition, a further 17 responses were received by email to the designated mailbox [wastedisposalstrategy@kent.gov.uk](mailto:wastedisposalstrategy@kent.gov.uk)

Kent received a similar level of responses to East Sussex County Council who ran a consultation in the summer 2018 proposing the same charging policy, but which also included proposals to close HWRCs.

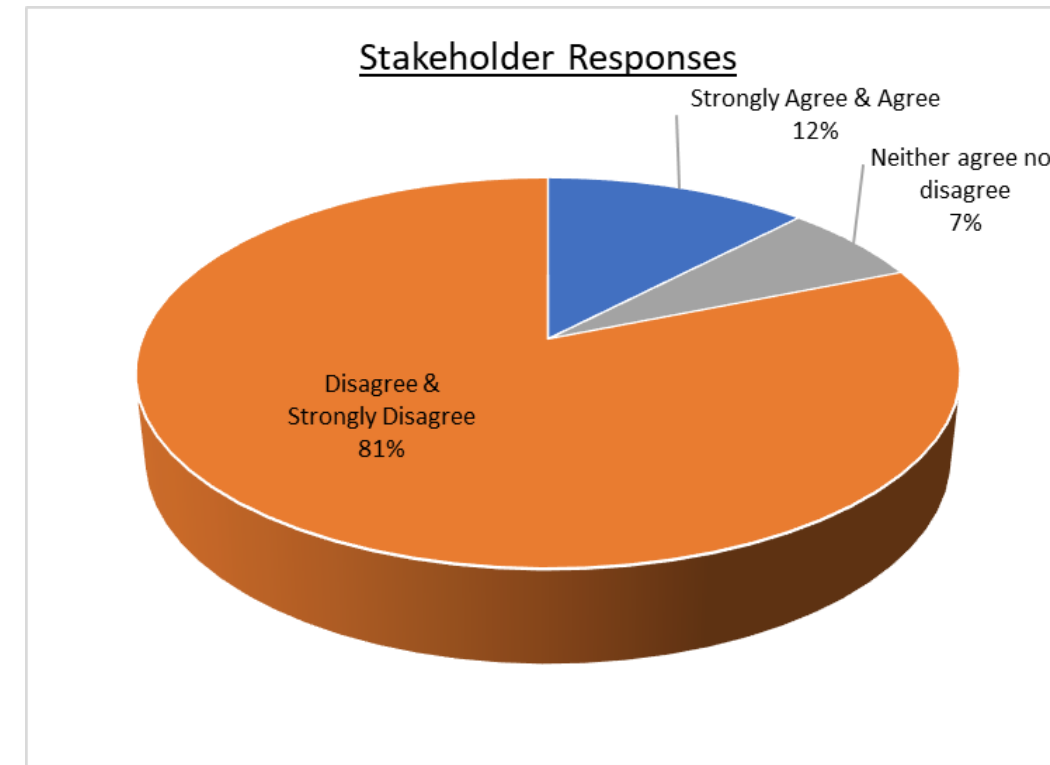
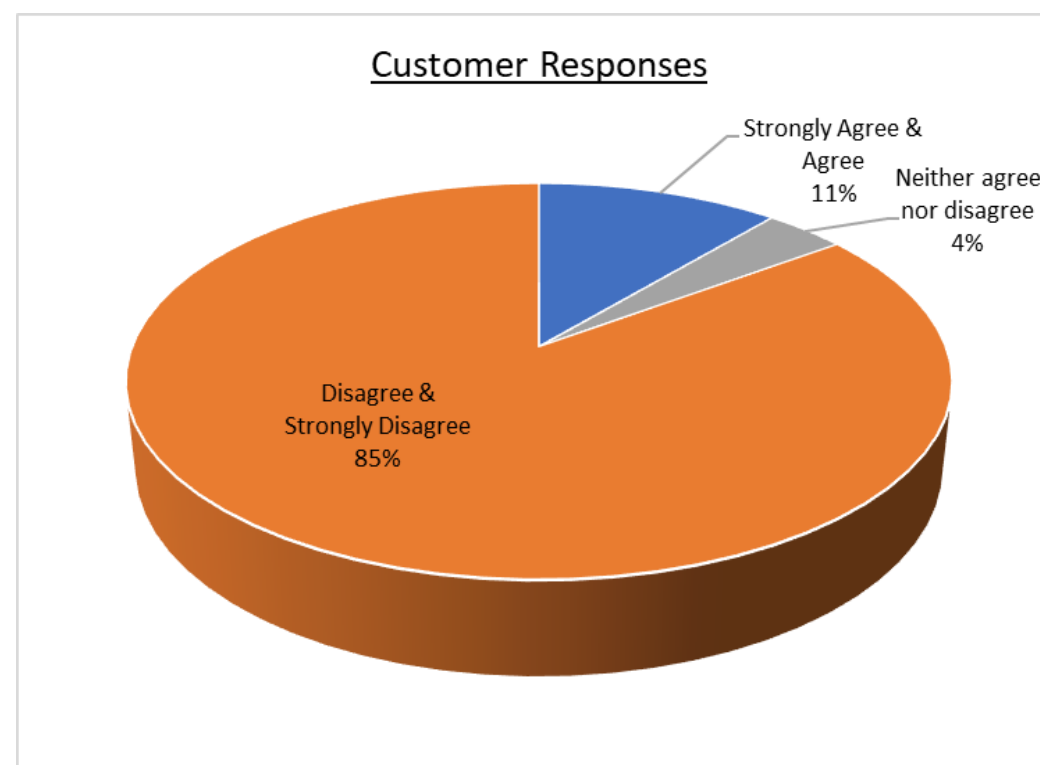
The table below provides a summary of responses received relating to the policy proposal.

Summary of all public consultation responses received, aligned to the policy proposal

CONSULTATION PROPOSAL	OVERARCHING CUSTOMER RESPONSE	OVERARCHING STAKEHOLDER RESPONSE
<b>PROPOSED POLICIES</b>		
1. Charge for the disposal of non-household waste (soil, rubble, hardcore and plasterboard) delivered to Kent Household Waste Recycling Centres	<ul style="list-style-type: none"> <li>11% of respondents agreed that these materials should be charged for when deposited at Kent Household Waste Recycling Centres</li> <li>85% responded 'disagree or strongly disagree'</li> <li>4% responded 'neither agree nor disagree'.</li> </ul> <p>Comments included:</p> <ul style="list-style-type: none"> <li>Potential fly tipping 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>Increased cost to councils for removal of fly tipping</li> <li>Already pay Council tax for the service / Should increase Council Tax</li> <li>Change vehicle restrictions / Raise height barrier for customers with larger vehicles</li> <li>Prevent business waste entering HWRC</li> <li>Introduce a permit scheme to prevent cross border waste</li> <li>Stronger enforcement including the use of technology (CCTV/ANPR)</li> </ul>	<ul style="list-style-type: none"> <li>12% of respondents agreed that these materials should be charged for when deposited at Kent Household Waste Recycling Centres</li> <li>81% responded 'disagree or strongly disagree'</li> <li>7% responded 'neither agree nor disagree'.</li> </ul> <p>Comments included:</p> <ul style="list-style-type: none"> <li>Potential increase in fly tipping</li> <li>Prevent business waste entering HWRC</li> <li>Introduce a permit scheme to prevent cross border waste</li> <li>Stronger enforcement including the use of technology (CCTV/ANPR)</li> </ul>

These figures are broken down further below:

	Customer	Stakeholder
<b>Strongly Agree</b>	90	1
<b>Agree</b>	216	10
<b>Neither</b>	102	6
<b>Disagree</b>	519	15
<b>Strongly Disagree</b>	1795	58



# INDEX

---

	<b>Page</b>
i) Executive summary	2
ii) Index	6
<b>1. Background</b>	<b>7</b>
Current service provision	7
Kent Waste Disposal Strategy	8
Current operating policy	9
Current operating cost	11
Legal advice	12
Political process	12
<b>2. Consultation engagement</b>	<b>14</b>
Accountability	14
Communication approaches	14
Scale of consultation engagement	17
Accessibility considerations	18
Document downloads	18
<b>3. Equalities Impact Assessment</b>	<b>19</b>
<b>4. Respondent profile and activity</b>	<b>20</b>
Number of responses received	20
How respondents heard about the consultation	20
Response rate and method	20
Response timeline	22
Response profile of all respondents	22
Stakeholder response profile	24
<b>5. Consultation responses – HWRC policy</b>	<b>27</b>
<b>6. Consultation responses – About you</b>	<b>34</b>
<b>7. Consultation responses – More about you</b>	<b>37</b>

# 1. BACKGROUND

## 1.1 CURRENT SERVICE PROVISION

Kent County Council (KCC) 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 provide free of charge 'entry' for its residents and be open over part of a weekend. See Appendix A, Waste Disposal Authority: legal obligations

The Act also includes a power to charge for waste other than household waste, and also to charge cross border residents, at household waste recycling centres.

There are 18 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 (Canterbury, Sevenoaks and Folkestone & Hythe) have two, with two districts (Dover and Swale) having three HWRCs. Tonbridge & Malling Borough Council (TMBC) 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. KCC officers are working with Members to identify ways to ensure adequate HWRC capacity is available within Kent for residents, including to serve the Tonbridge & Malling/ west Kent area, into the future.

Of these 18 HWRCs, six are co-located with Waste Transfer Stations (WTSs) provided by KCC. The WTSs accept waste from the Waste Collection Authorities (WCAs) (Kent District and Borough Councils), where the waste is then loaded in bulk into larger vehicles ready for onward processing/treatment. Only the WTSs have weighbridges and may also accept trade waste based on charges by tonnage.

The sites' management is out-sourced and are currently managed by four private waste management companies. These organisations manage the day-to-day operation of the HWRCs/WTSs on behalf of KCC.

The Kent network of HWRCs manages approximately 185,000 tonnes of domestic waste yearly, at a cost of nearly £10m.

There are a number of policies already in place which have provided some savings and efficiencies in recent years.

KCC Waste Management are now seeking further savings and efficiencies with a technological and innovative approach to service provision, to support a dynamic and durable service delivery for years to come.

## **1.2 KENT WASTE DISPOSAL STRATEGY**

KCC Waste Management developed a new Waste Disposal Strategy in 2017, which sets out the direction of KCC as the Waste Disposal Authority (WDA) up to 2035. It includes the overarching ambition for Waste Management;

***“Our Ambition is to deliver a high quality, value for money household waste disposal service for the people of Kent, with an emphasis on waste reduction, recycling and achieving zero landfill.”***

The Waste Disposal Strategy was formally adopted by the Cabinet Member for Environment and Transportation in February 2017. The full strategy document can be found at

<https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/kent-waste-disposal-strategy>

Legislation, ongoing cost reduction measures being faced across the public sector, and our need to increase recycling, reuse and recovery performance to meet targets, means we must now prioritise and safeguard our statutory requirements if we are to deliver the Kent Waste Disposal Strategy's sustainably.

Taking into account the current HWRC infrastructure, anticipated population growth within Kent and the resultant increase in waste, as well as an ongoing requirement to make savings, KCC is under pressure to consider new and innovative ways to deliver services.



### 1.3 CURRENT OPERATING POLICY

On 1<sup>st</sup> October 2012, a number of policy changes came into effect across Kent County Council's network of HWRCs. The policies were set to reduce the number of traders illegally exploiting these facilities, which are for householders use only, and reduce the unnecessary disposal charges borne by the Kent tax-payer. In February 2014, a review following the first year of policy implementation identified a reduction of 45,000 tonnes of waste handled (24% reduction over the previous year) resulting in cost savings of approx. £2.3m.

A further policy review was undertaken in 2017 which resulted in a few small amendments to existing policies to make them more robust.

The table below details existing HWRC policies:

<b>Existing policies:</b>	
1.	<b><i>Soil, rubble and hardcore:</i></b> The amount of soil, rubble and hardcore that could be delivered to the HWRC is limited to 90kgs (190lbs) per day by a single vehicle or combined with a trailer. To put this amount into perspective, it represents approximately 5 sacks of soil, rubble and hardcore.
2.	<b><i>Asbestos:</i></b> Asbestos is limited to 5 sacks or the equivalent per month and is accepted at all HWRCs (except Sheerness).
3.	<b><i>Tyres:</i></b> Tyres are limited to 5 tyres per visit (car and motorbike tyres only) at a charge of £2.50 per tyre and are accepted at all HWRCs.
4.	<b><i>Vehicle restrictions:</i></b> Vehicle restrictions are in place to prevent trade waste from entering the HWRCs. Some vehicles may require vouchers to gain access.  Vehicles allowed without needing vouchers: <ul style="list-style-type: none"><li>• Cars and estate cars with windows all the way round and seats throughout.</li><li>• People carriers, 4x4s and minibuses (excluding open backed vehicles) with windows all the way round and seats throughout (maximum 9 seats).</li><li>• Taxis and sign-written cars with windows and seats throughout.</li></ul>

	<p>Vehicles needing vouchers:</p> <p>To get vouchers for the vehicle types noted below, it must be the only vehicle in the household, no more than 2m tall (unless a campervan or minibus) and have a maximum gross vehicle weight (GVW) of less than 3.5 tonnes.</p> <ul style="list-style-type: none"> <li>• People carriers, 4x4s, minibuses with panels in place of windows and/or no rear seats.</li> <li>• Pick-up trucks or open back vehicles (including those with a removable top).</li> <li>• Minibuses with 10 seats or more.</li> <li>• Van – car derived (at manufacture stage or modified). Panels in place of windows and/or no rear seats.</li> <li>• Panel vans.</li> <li>• Campervans or minibuses over 2m high (but less than 3.5 tonnes), with windows and seats throughout.</li> </ul> <p>Vehicles not allowed:</p> <ul style="list-style-type: none"> <li>• Vehicles with a maximum gross vehicle weight (GVW) of more than 3.5 tonnes.</li> <li>• Vehicles more than 2m tall (unless a disability adapted vehicle or campervan/ minibus).</li> <li>• Hire vehicles.</li> <li>• Horseboxes and agricultural trailers.</li> </ul>
5.	<p><b>Trailer size:</b></p> <p>Trailers bodies must comply with the following:</p> <ul style="list-style-type: none"> <li>• Not more than 2.05m in length.</li> <li>• Sides of trailers must not be built up to allow for more capacity – this is unsafe and access to HWRCs will not be permitted.</li> <li>• Trailers must not be overloaded and must be within the vehicles towing capacity.</li> <li>• No agricultural trailers or horse boxes are permitted.</li> <li>• Trailers cannot be used with restricted vehicles.</li> <li>• Conformance with all other HWRC policies.</li> </ul>
6.	<p><b>Height Barriers</b></p> <p>Height Barriers are set at 2m / 6' 6" and have been in force across the network of Kent HWRCs since 1997. They intend to exclude commercial type vehicles and trade waste from entering the sites.</p>

7.	<p><b><i>Disability Adapted Vehicles:</i></b></p> <p>Kent residents should contact KCC to make arrangements to access HWRCs in disability adapted vehicles. A height restriction of 2 metres (6ft 6 inches) applies at Sevenoaks, Swanley and Faversham HWRCs. At all other HWRCs the height barrier can be opened for over-height disability vehicles following arrangements made with KCC.</p>
8.	<p><b><i>Cross Border Usage (Dartford Permit Scheme)</i></b></p> <p>Dartford residents are issued a permit which allows free, direct access to the Dartford HWRC with domestic waste. This scheme was introduced in 1997 to tackle the large number of cross border customers from the London Borough of Bexley and The London Borough of Bromley using Kent facilities at the cost of the Kent Tax Payer. Cross border customers can use the Dartford HWRC at a fee of £10 per visit, payable at the entrance by ticket machine.</p>

KCC Waste Management are now seeking further savings and efficiencies with a technological and innovative approach to service provision, to support a dynamic and durable service delivery for years to come.

#### **1.4 CURRENT OPERATING COSTS**

The £10m cost associated with the operation of the HWRC service (excluding WTSs) 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 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, it generally costs less to recycle (or compost) than sending it for disposal. Increasing recycling reduces the overall cost of the HWRC service.

## **1.5 LEGAL ADVICE**

There is no requirement to accept any waste other than a resident's own household waste free of charge at HWRC's. Waste considered non-household (for which a charge may be made at HWRCs) can include soil, rubble, hardcore and plasterboard. Even if originating from a domestic property, these materials are to be treated as non-household waste in accordance with the Controlled Waste Regulations 2012.

KCC Waste Management sought independent legal advice to confirm the ability to charge for non-household waste. This legal advice has been further reviewed in October 2018 to ensure there have been no changes to legislation. The resulting advice note provides the clear legal position defined by the primary legislation which permits charging for non-household waste.

See Appendix B.

Appendix C contains a MRW (Materials Recycling World) article regarding DCLG (Department for Communities and Local Government) comments on HWRC charges for non-household waste.

## **1.6 POLITICAL PROCESS**

A Cross Party Member Group (CPMG) was established in 2015 with the purpose of informing the development of the Kent Waste Disposal Strategy (KWDS) outlining how the disposal of waste in Kent will be managed over the coming years. The CPMG helped guide the strategy development and considered the ambition, priorities and objectives.

The KWDS was adopted in February 2017, after which a new CPMG was established to ensure Members were equipped with relevant information for an informed debate to consider options to deliver the strategy.

The CPMG met 7 times during the period July 2017 and October 2018, to discuss in particular Household Waste Recycling Centre (HWRC) policies and network infrastructure. Various options were considered and discussed with the CPMG and the Group were instrumental in developing the HWRC charging for non-household waste proposal and associated consultation documents.

The proposal to charge for soil, rubble, hardcore and plasterboard was presented to the Environment and Transport Cabinet Committee on 13 July 2018 where it received endorsement to consult. An Equality Impact Assessment was conducted to accompany the proposal.

This report presents the responses received to the public consultation and will be presented to the Environment and Transport Cabinet Committee, before a final decision is taken by Councillor Mike Whiting, Cabinet Member for Planning, Highways, Transport and Waste, on whether to commence charging for these non-household wastes. Implementation of any agreed policy changes are anticipated to take effect from summer 2019 onwards, subject to Members' decision. See Appendix D for CPMG Members

## **2. CONSULTATION ENGAGEMENT**

### **2.1 ACCOUNTABILITY**

Consultation should promote accountability and assist decision making: public bodies should give an account of their plans or proposals and they should ensure that all responses are taken into account in order to:

- Be informed of any issues, viewpoints, implications or options that might have been overlooked;
- Re-evaluate matters already known; and
- Review priorities and principles.

A consultation is not a vote; influencing public policy through consultation is not simply about the greatest numbers automatically determining the outcome. It's about understanding the impact our proposals may have on our customers and using this insight, along with other evidence, to enable well informed decisions to be made.

All types of consultation responses are important – for example, in the current consultation we received a range of different responses from customers and stakeholders.

This report aims to identify where strength of feeling may be particularly intense, while recognising that interpreting consultation is not simply a matter of counting responses.

### **2.2 COMMUNICATION APPROACHES**

The Kent HWRC network receives approximately 3.5m visitors each year, 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 predominantly in electronic form, and also in paper format. 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 EqIA shaped the engagement and participation mechanisms, identifying any protected characteristics which had the potential to be negatively impacted by the proposed policies, and ensuring that attention was paid to engagement with identified protected characteristic groups in Kent.

A full communication plan was created based upon advice provided by KCC Consultation & Engagement and Corporate Communications teams. The following communication approaches were developed and delivered:

### **2.2.1 KCC website**

A dedicated web page ([www.kent.gov.uk/wasteconsultation](http://www.kent.gov.uk/wasteconsultation)) 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. A dedicated email address was also used specifically for any email correspondence regarding the consultation ([wastedisposalstrategy@kent.gov.uk](mailto:wastedisposalstrategy@kent.gov.uk)).

### **2.2.2 Social Media**

Information was posted weekly on both Facebook and Twitter for the duration of the consultation period.

### **2.2.3 Gateways**

Each of the 9 Kent Gateways were provided with a supply of postcards, posters and paper copies of the consultation questionnaire. Gateways with 'information screens' carried information about the consultation.

### **2.2.4 Libraries**

A poster advertising the consultation, along with postcards and paper copies of the questionnaire were provided to each KCC Library.

### **2.2.5 Engagement at HWRCs**

A banner and an A1 sign advertising the consultation were installed at each of the 18 HWRCs on the 6<sup>th</sup> September 2018 and displayed for the full 8 weeks.

Site staff across all 18 HWRCs handed information postcards to approximately 30 customers per day for the duration of the consultation, giving more than 30,000 customers opportunity to hear about the consultation.

Furthermore, between 6<sup>th</sup> September and 17<sup>th</sup> October 2018, Waste Management officers also handed more than 1,800 postcards to HWRC customers whilst engaging them in dialogue and promoting the consultation across all 18 HWRCs.

### **2.2.6 DIY Stores and Garden Centres**

As the materials included in the charging policy proposal can be purchased from DIY stores and/or garden centres, posters and postcards were sent to 48 stores across Kent for use in 'point of sale' locations.

### **2.2.7 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 poster and a supply of postcards via The Kent Association of Local Councils (KALC) and were asked to make their residents aware of the consultation. Paper copies of the consultation were provided on request. Feedback was also encouraged from individuals, as well as a combined response of the whole parish.
- 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. District Councils were also provided a poster and postcards for display in local councils' offices.
- The Environment Agency was provided with an electronic copy of the questionnaire and encouraged to respond to the proposal.
- KCC waste contractors were also provided with information and encouraged to respond.
- Information was provided to Kent County Council Members via The Information Point, and a paper copy of the questionnaire was placed into every Members pigeon hole at the Members Desk.

### **2.2.8 Radio Interview**

- Michael Payne, Deputy Cabinet Member for Highways, Transport and Waste was interviewed by Radio Kent on 17<sup>th</sup> September 2018 and given the opportunity to explain the proposals being consulted on.



## 2.3 SCALE OF CONSULTATION ENGAGEMENT

COMMUNICATION METHOD	REACH
<b>Measurable reach figures</b>	
Postcards – handed out at HWRCs by site staff	30,000 unique visitors which is equal to approximately 5% of all weekly users
HWRC customer engagement. KCC Officers	Nearly 2,000 customers engaged with
<b>Un-measurable reach figures</b>	
Social Media Facebook and Twitter	9 messages were posted on both Facebook and Twitter over the eight-week consultation period. See Appendix E for details of posts along with number of comments, retweets, likes etc.
Gateways (screens, postcards, posters and paper copies of consultation document)	Available in all 9 Kent Gateways
Libraries (posters, postcards and paper copies of consultation document)	Available in all 99 KCC Libraries
DIY stores and Garden centres (posters and postcards)	Sent to 48 stores across Kent including Homebase, Wickes, B&Q, Travis Perkins, Wyevale, Millbrook, Notcutts etc.
Diversity groups (email)	Sent to more than 80 diversity groups
HWRC signage	'Opportunity to see' for more than 538,000 visitors over the eight-week consultation period
<b>Stakeholders</b>	
Parish and Town Councils (email, letter, posters and postcards. Consultation document paper copies supplied on request)	Sent to all 316 town and parish councils
District Council Waste Managers (email, letter, posters and postcards)	Sent to 12 Kent district/ borough councils and Medway Council
Environment Agency (email)	Sent to the Kent Area Office
KCC HWRC contractors (email)	Sent to all 4 HWRC contractors

Recycling/Disposal contractors (email)	Sent to 5 contractors who currently process the relevant non-household waste materials from Kent HWRCs
--	--

## 2.4 ACCESSIBILITY CONSIDERATIONS (read in conjunction with EqIA)

### 2.4.1 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, an e-mail was sent to over 80 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. Also see Appendix F: EqIA and action plan.

### 2.4.2 Alternative formats

Prior to the launch of the consultation, the consultation questionnaire was also produced in an 'Easy Read' format. Two Easy Read responses were received.

All consultation material provided contact information for people to request information in alternative formats. These would have been accommodated if required, however, no requests were received. Also see the Equalities Impact Assessment in section 3.

## 2.5 Document downloads

The table below details the documents available on [www.kent.gov.uk/wasteconsultation](http://www.kent.gov.uk/wasteconsultation) during the consultation period, along with how many times each document was downloaded:

Documents	Downloads
Consultation Document & Questionnaire (PDF Version)	3072 downloads
Consultation Document & Questionnaire (Word Version)	570 downloads
Frequently asked questions (FAQ's) - (PDF version)	361 downloads
Frequently asked questions (FAQ's) - (Word version)	113 downloads
Chargeable material item list - (PDF version)	610 downloads
Chargeable material item list - (Word Version)	243 downloads
Equality Impact Assessment Document (PDF Version)	92 downloads
Equality Impact Assessment Document (Word Version)	46 downloads
Consultation Document - Easy Read Version	164 downloads

### **3. 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 (EqIA) provides a process to help us to understand how the proposed HWRC charging policy and service changes may affect Kent residents. The EqIA will help to ensure that KCC is providing an inclusive HWRC service.

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

The EqIA 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. See Appendix F: Full EqIA including action plan.

In the initial screening, age, disability and race were identified as being potentially impacted upon as a result of the proposed charging. The public consultation responses did not reveal any further impacts to these protected characteristics or any others, than those that had already been identified. However, some further issues were identified that were not-related to any one protected characteristic, namely the impact of disposal costs to those on low income and the ability of people to lift different weights of bags. These issues and related mitigations have been included within the 'action plan', to be undertaken should the decision be taken to adopt charging for the non-household waste materials.

## 4. RESPONDENT PROFILE AND ACTIVITY

### 4.1 NUMBER OF RESPONSES RECEIVED

**Total responses received: 2,841**

~ Responses: 2,841 consisting of:

- 2,757 online responses; and
- 62 paper responses
- 22 comments received by email or letter

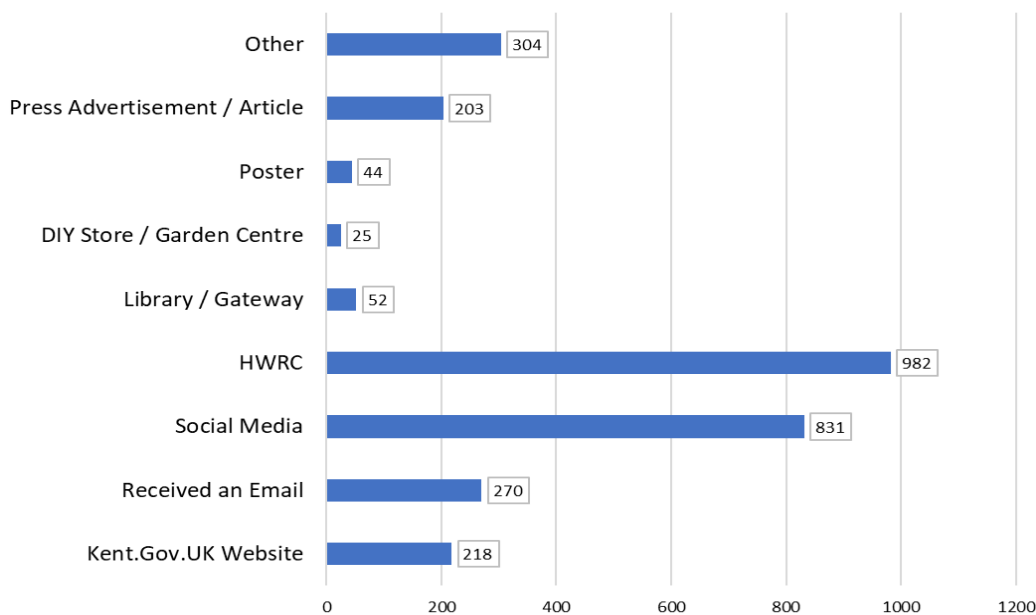
Please see section 5 for breakdown of customer and stakeholder responses.

No requests were received for alternative format versions. Two easy read versions of the consultation questionnaire were received.

### 4.2 How customers heard about the consultation

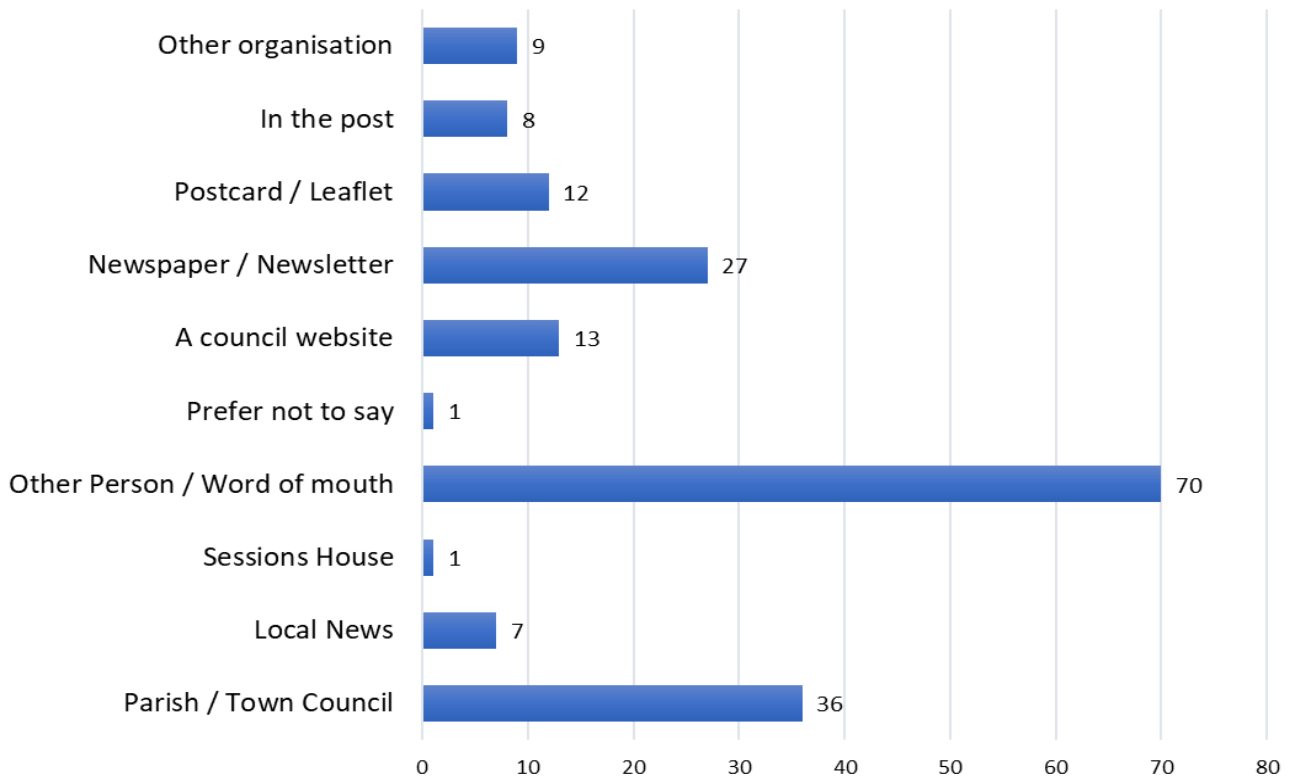
The consultation questionnaire asked the respondent how they heard about the consultation. Of the 2,841 total responses, 2,929 answered this question. The graph below presents the responses to this question. Please note, respondents were able to choose more than one communication method, therefore the percentage has been calculated from all answers rather than the number of respondents:

**How those respondents who completed the questionnaire heard about the consultation.**



10% of respondents commented that they had heard about the consultation through 'other' means. Out of the 304 respondents that selected 'other', 184 specified by what method they had heard about the consultation, these responses are detailed in the graph below:

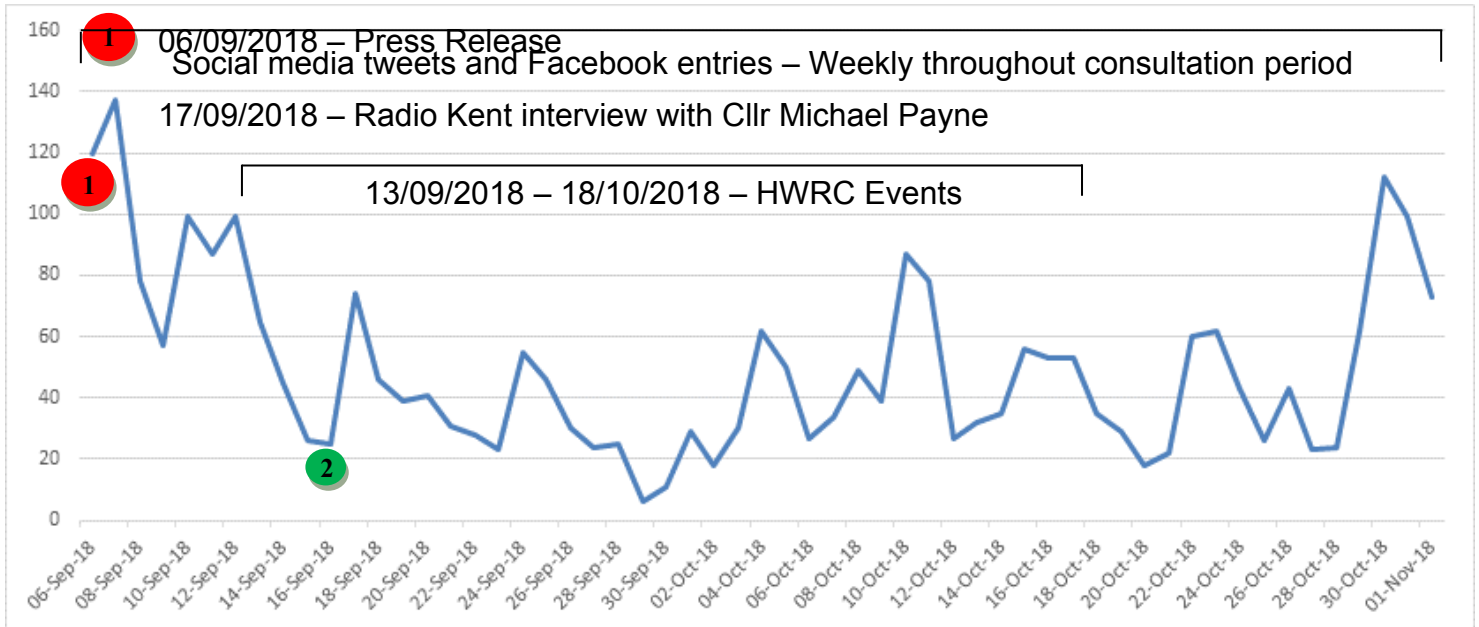
### 'Other' response composition



### 4.3 RESPONSE TIMELINE: ALL RESPONSES

The graph below shows the quantity of all responses received over the eight-week consultation period, highlighting notable events during that period that may have influenced the response rate.

#### Timeline of all customer responses received

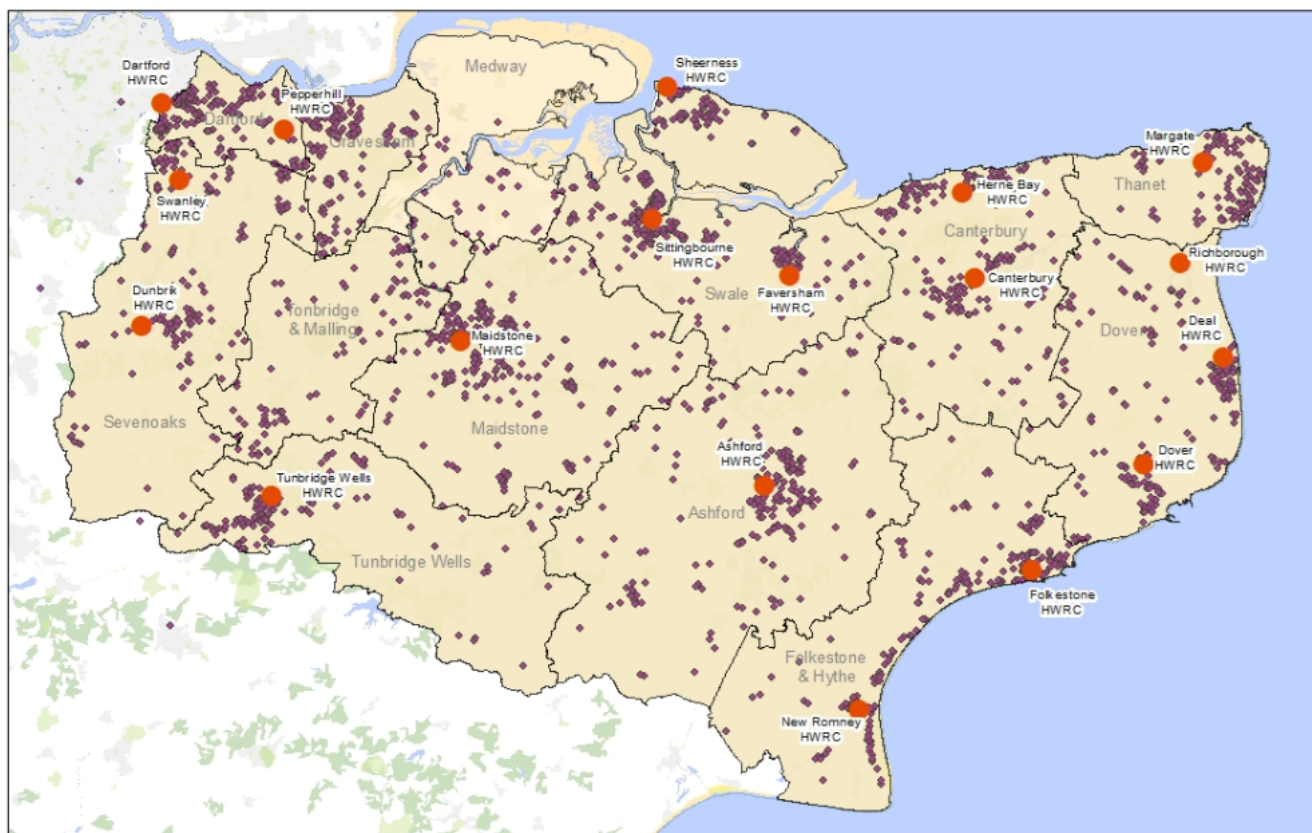


2

### 4.4 RESPONSE PROFILE OF ALL RESPONDENTS

The maps and graph below highlight the geographical distribution of all respondents. Of the total 2,841 responses received, 2,653 (93%) provided their postcode. Please note that out of the 2,653 postcodes provided, 179 were unrecognisable on the software used for this analysis. Therefore, the information below represents the distribution of the recognisable postcodes provided by 2,474 respondents (87% of total respondents).

## Geographical distribution of all respondents:

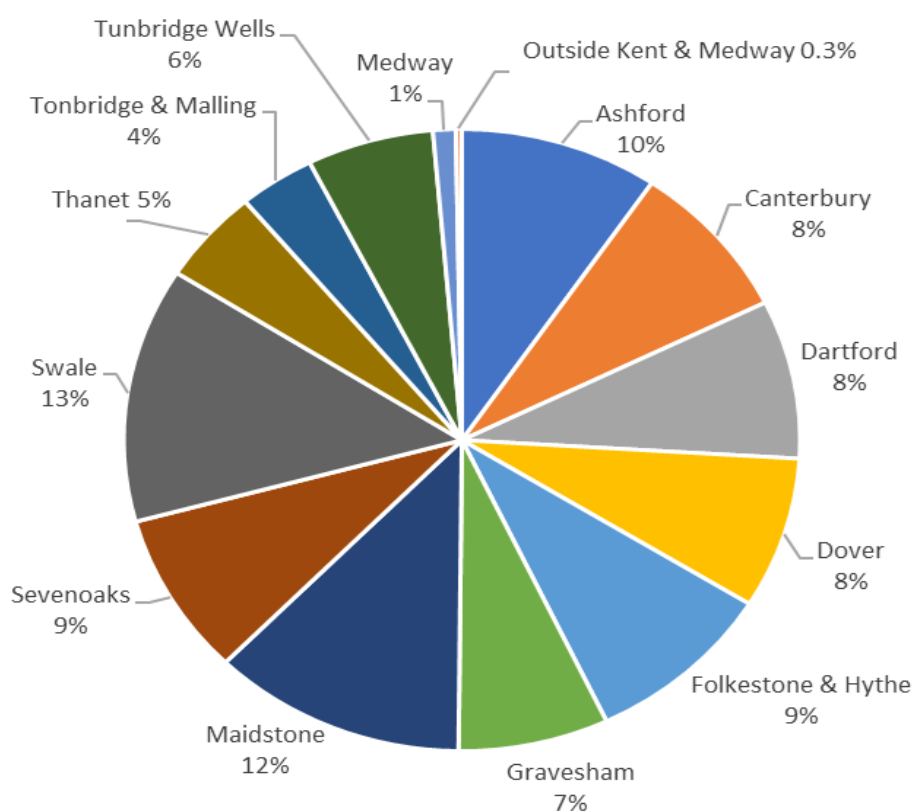


Produced by Waste Management, KCC.  
© Crown Copyright. All rights reserved 100019238, 2018.

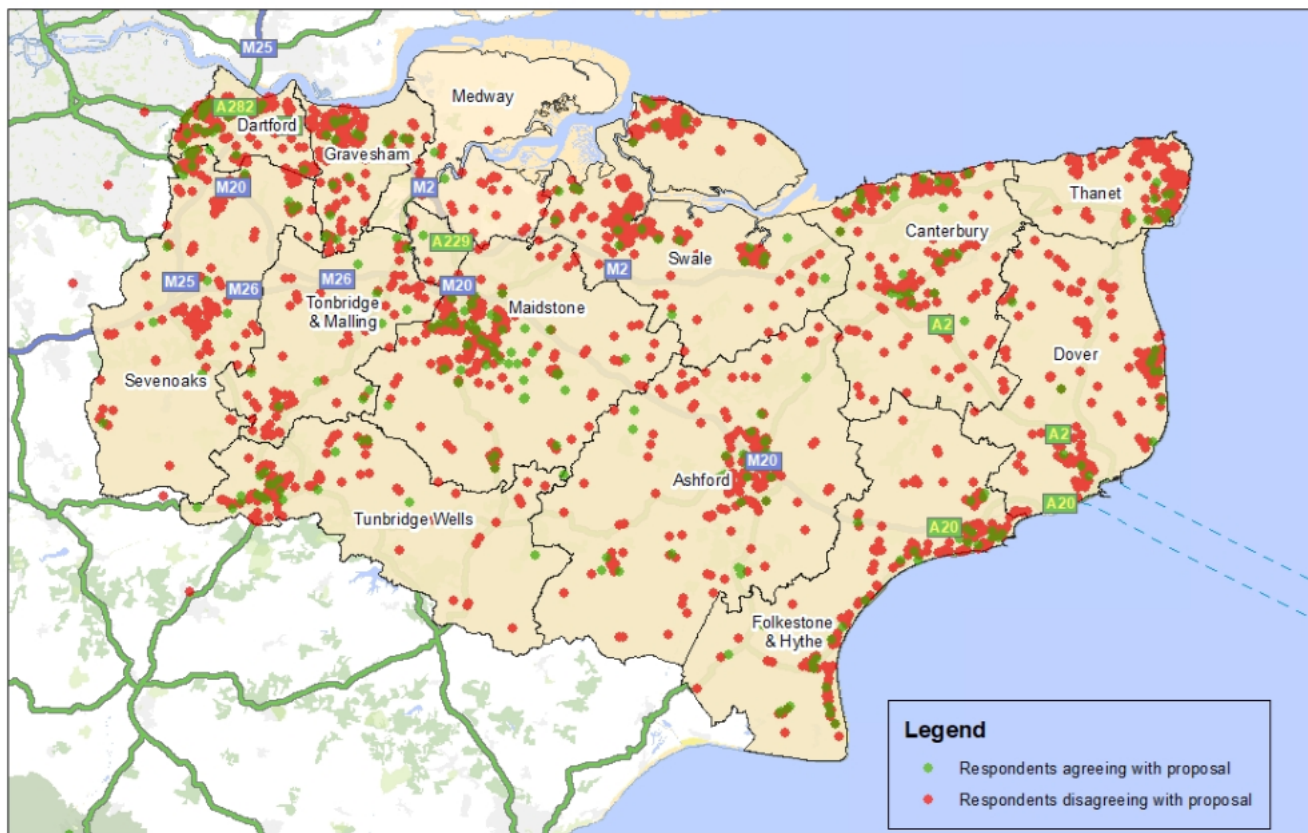
20 Miles



## Geographical distribution of all respondents, grouped by Kent district:



**Geographical distribution of all respondents, highlighting 'agree' or 'disagree' to the proposed charging policy**



Produced by Waste Management, KCC.  
© Crown Copyright. All rights reserved 100019238, 2018.

20 Miles



**4.5 STAKEHOLDER RESPONSE PROFILE**

A total of 99 responses were received from stakeholders including district and parish councils, waste management contractors and other agencies.

**Stakeholder respondents**

Respondent type	Respondent
<b>District Councils (8 responses)</b>	Canterbury City Council (2 separate responses received)
	Dover District Council
	Folkestone and Hythe District Council
	Gravesham Borough Council
	Maidstone Borough Council
	Sevenoaks District Council
	Swale Borough Council
	Thanet District Council
<b>Parish &amp; Town Councils (72 responses)</b>	Acrise Parish Meeting

Public Consultation Responses: Household Waste Recycling Centres  
Charging for non-household waste (soil, rubble, hardcore and plasterboard)



Adisham Parish Council
Alkham Parish Council
Ash Parish Council
Badgers Mount Parish Council
Barham Parish Council
Barming Parish Council
Bobbing Parish Council
Boughton Aluph & Eastwell Parish Council
Boughton Monchlesea
Boughton under Blean Parish Council
Boxley Parish Council
Bridge Parish Council
Broomfield & Kingswood Parish Council
Chart Sutton Parish Council
Chiddingstone Parish Council
Chislet Parish Council
Cliffsend Parish Council
Coxheath Parish Council
East Farleigh Parish Council
Eastry Parish Council
Eynsford Parish Council
Eythorne Parish Council
Faversham Town Council
Great Mongeham Parish Council
Hartley Parish Council
Hawkinge Town Council
Hever Parish Council
Hextable Parish Council
Horsmonden Parish Council
Hothfield Parish Council
Ickham and Well Parish Council
Iwade Parish Council
Kent Association of Local Councils (KALC)
Kemsing Parish Council
Langley Parish Council
Leigh Parish Council
Littlebourne Parish Council
Lynsted with Kingsdown Parish Council
Marden Parish Council
Milstead Parish Council
Meopham Parish Council
Minster-on-Sea Parish Council
Minster Parish Council
New Romney Town Council
Northbourne Parish Council
Oare Parish Council
Penshurst Parish Council
Pluckley Parish Council

	Ramsgate Town Council
	River Parish Council
	Rodmersham Parish Council
	Rusthall Parish Council
	Seal Parish Council
	Sellindge Parish Council
	Shadoxhurst Parish Council
	Shoreham Parish Council
	Shorne Parish Council
	Southborough Town Council
	St Margaret's at Cliffe Parish Council
	St Mary in the Marsh Parish Council
	Sutton at Hone & Hawley Parish Council
	Sutton by Dover Parish Council
	Swingfield Parish Council
	Ulcombe Parish Council
	Warehorne Parish Council
	West Malling Parish Council
	Wickhambreaux Parish Council
	Wingham Parish Council
	Womenswold Parish Council
	Woodnesborough Parish Council
	Yalding Parish Council
<b>District / Borough / Parish / Town Council (10 responses)</b>	In addition to the District / Borough / Parish / Town Council responses noted above, an additional 10 responses were received in this category, without the Council name being noted
<b>Neighbouring Councils (2 responses)</b>	Medway Council
	East Sussex County Council
<b>Other agencies (2 responses)</b>	Communities, Housing and Environment Committee – Maidstone Borough Council
	KCC, Sustainable Business & Community (KES)
<b>HWRC contractors (0 responses)</b>	None received
<b>Recycling / Disposal contractors (0 responses)</b>	None received

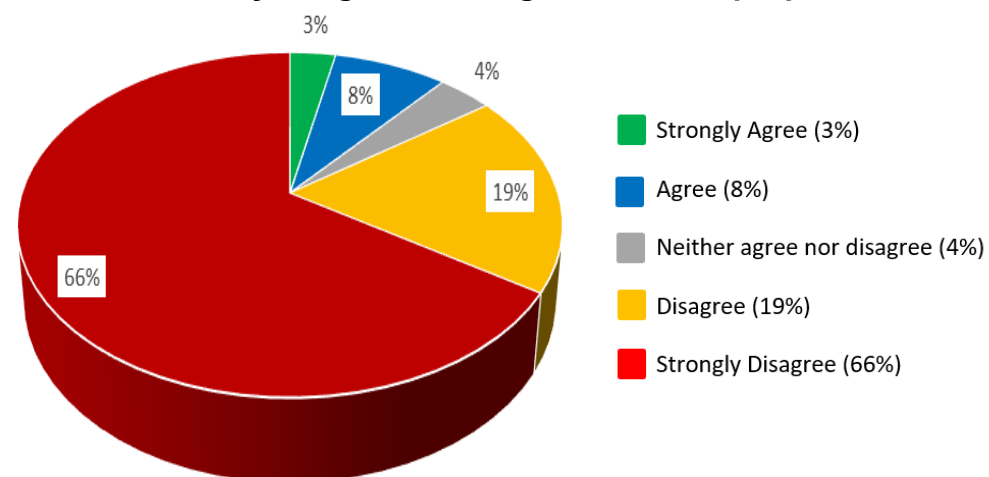
## **5. CONSULTATION RESPONSES**

The following data has been produced by analysing all 2,841 responses (customers and stakeholders). The quantities and percentages stated are from all responses, however key comments from both customers and stakeholders have been identified separately. Please note: not every question had to be answered by respondents and as a result the number of responses will not add up to 2,841 each time.

**5.1 KCC is proposing to introduce a modest charge for the following non household wastes, to off-set the cost of providing the service:**

- Soil, Rubble and Hardcore
  - This also includes other materials such as ceramics which are recycled in the soil, rubble and hardcore container.
  - In line with neighbouring Councils we anticipate the charge to be: £4 per bag (or part bag) / item (a bag being up to the size of a standard black sack)
  - A daily limit in line with current restriction will apply – a maximum of 5 bags / items
  
- Plasterboard:
  - In line with neighbouring Councils we anticipate the charge to be: £6 per bag (or part bag) / sheet (a bag being up to the size of a standard black sack)

**To what extent do you agree or disagree with this proposal?**



**Example Stakeholder Comments**

“The charges will only increase fly-tipping incidents. The villages in Kent are already fly-tipping hotspots and the charge will result in the villages suffering with more of this”

“Our Parish Council is neither in favour nor against this proposal but has concerns that it might penalise householders who are doing legitimate DIY projects.”

“While the Council understands some the reasons for the KCC proposals to charge for Soil, Rubble and Hardcore, our main concern is the impact this proposal could have on fly tipping in the district which will impact on the Council's resources and budgets.”

“There may be an increase of soil found in the garden waste or residual collection bins, which is not permitted. This will cause problems for the contractor and their vehicles and will have to be monitored closely.

“Although Members would prefer to see the service remain free to use, we accept that neighbouring councils' decisions leave little scope but to follow suit”.

“We understand the reasoning behind the proposed introduction of a charge at the HWRC for non-household waste items and support the need to protect this service for residents.”

**Example Customer Comments**

“Do worry charging will cause fly tipping, but think it is important to do so. Safeguarding our environment is very important to me”

“Whilst we agree that some kind of charge is appropriate, we have concerns that charges per bag and restrictions on the quantity of bags per day will lead to an increase in fly-tipping.

“We feel that a permit scheme for householders, perhaps with a restriction on the number of visits to the HWRC, might be more appropriate”

“I feel the proposal will lead to more fly tipping and would prefer to see an increase in Council tax to cover the cost”

“You must do the same as neighbouring Councils otherwise residents will bring their rubbish to Kent”.

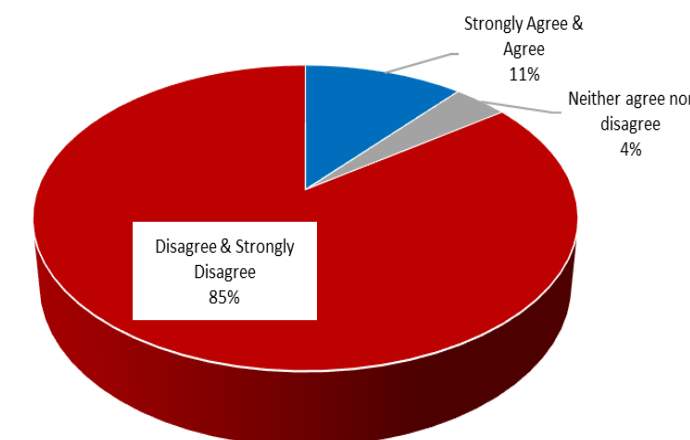
**Response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Concern of increase of fly tipping	1863	42	1905	1
Any income received will be required to clear up fly tipping	655	6	661	2
Disposal costs to residents too high	398	21	419	3
Charge non-Kent residents / proof of residency	225	4	229	4
Bag size not clear enough / too heavy	108	3	111	5
Stronger / more enforcement	106	5	111	6
Increase council tax	36	1	37	
Positive idea	14	0	14	
Other	3	0	3	
<b>TOTAL</b>	<b>3408</b>	<b>82</b>	<b>3490</b>	

**Overarching summary: To what extent do you agree or disagree with this proposal?**

85% of respondents completed this question

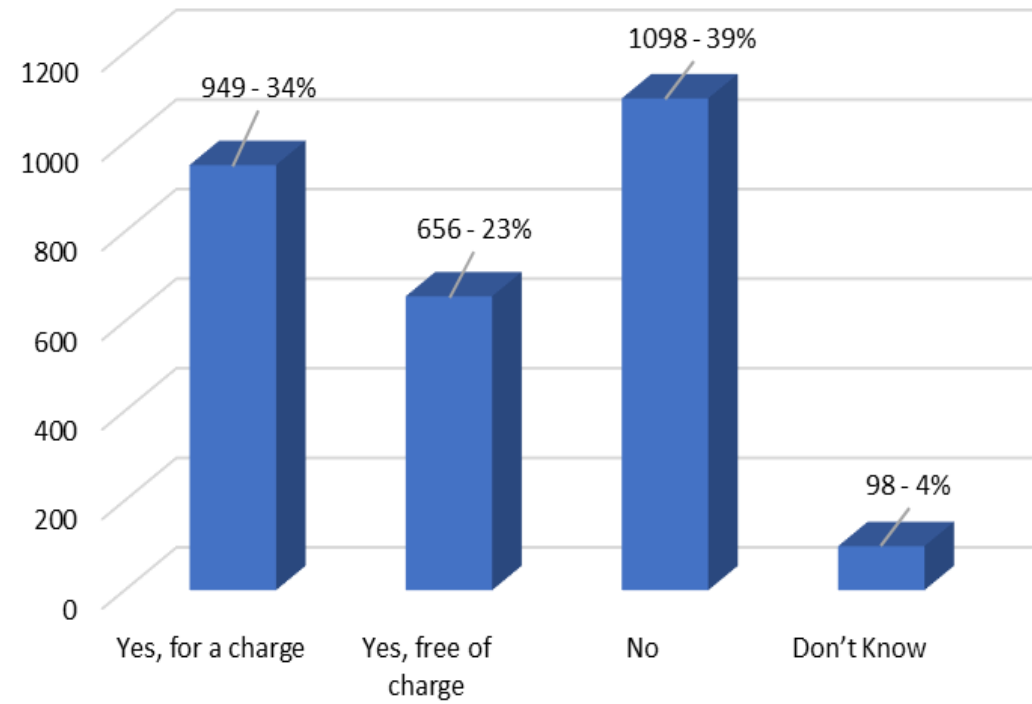
Option:	Total
Strongly Agree & Agree	317
Neither agree nor disagree	108



Disagree  
& Strongly Disagree

2387

**5.2 Do you think that non-Kent residents should be able to deposit their waste at Kent HWRCs?**



**No text box was provided for this question. The responses noted here were applied to the question at the end of the consultation: 'Do you have any further comments or suggestions you would like to make?'**

**Example Stakeholder Comments**

"If going to go through the administration process of identifying and charging on site, could at the same time have a resident proof / discount for no more admin time."

"Sympathies with the valid issues of KCC not legally obliged to provide this service, that neighbouring councils already implemented etc. However, the impact of this policy (as with many other County / District cut backs), is that the residents and Parish / Town Councils will inevitably suffer the consequences. In this case, more fly tipping"

"The principle of charging out of County residents for waste disposal is fair, however the principle of charging residents for this service is unfair"

"Clearly it is unfair that non-Kent residents should have the opportunity to dispose of their rubbish etc at a Kent based HWRC, just as it would be unfair for a Kent resident to dispose of their waste free of charge at a non-Kent HWRC"

"We recognise that savings need to be made and that reinvestment in waste infrastructure is required, and that with increasing budget restrictions these decisions are of course difficult to make. We also agree that it is unfair for our residents, Kent taxpayers, to have to pay for the disposal of 'non-Kent' residents waste and understand the concerns regarding the impact of this issue on sites within Kent which border with other Authorities, where there is potential for this to occur".

"We agree that residents from other authority areas such as London Boroughs or Sussex should not have free access to Kent's HWRC facilities. A hybrid solution to the proposals could be to introduce a permit scheme for sites within a certain distance of the borders with these authorities. With the increase in digital solutions there must be a solution where local residents could register their vehicles online, so any unregistered vehicles could be highlighted and charged similar to systems used on toll roads such as the Dartford Crossing."

**Example Customer Comments**

"By having to produce documents, only Non-Kent residents will be charged"

"Only allowing Kent residents to use Kent HWRCs free of charge is unworkable. The cost of the bureaucracy in hold ups at sites would far outweigh any income; and the system would be easily circumvented".

"I would have no objection to charging non-Kent based users along with commercial users"

"If you are proposing a charge for this disposal, I would prefer you only charge businesses and out-of-county people, or even out-of-towners. The tip is there for the use of your customers and whilst we do use bins we also prefer to sometimes bring stuff to the tip rather than wait for the customary bin collection. It is not fair to keep charging the same people over and over again".

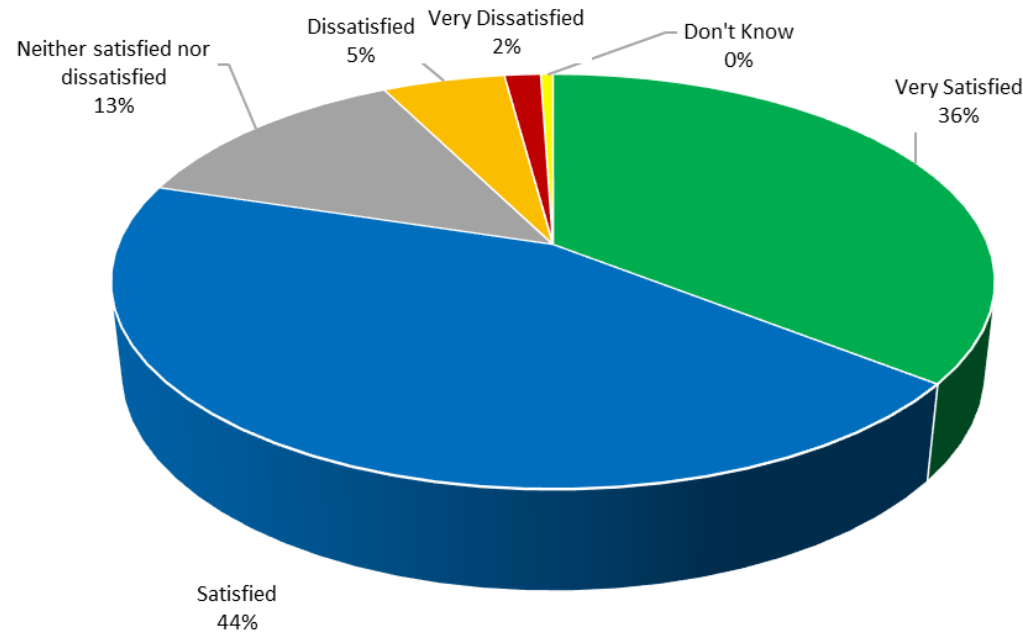
"If you are a resident in Kent then you should be able to use the centres for free if you are from outside of Kent then a small fee would be a sensible option".

	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Yes, for a charge	929	20	949	2
Yes, free of charge	639	17	656	3
No	1078	20	1098	1
Don't know	98	0	98	4
<b>TOTAL</b>	<b>2744</b>	<b>57</b>	<b>2801</b>	

**Overarching summary:**

- 99% of respondents answered this question

### 5.3 How satisfied are you overall with the HWRC service?



No text box was provided for this question. The responses noted here were applied to the question at the end of the consultation: 'Do you have any further comments or suggestions you would like to make?'

Example Stakeholder Comments
"I would like to see longer opening hours"
"The current HWRCs offer an excellent recycling service to local residents and while they do offer some segregation for goods this is limited by the space available at most sites. Offering space for a local charity to have a space for residents to drop off re-usable goods has worked in other parts of the country and would help increase re-use as part of the waste hierarchy".
"The hard work and sheer commitment of the staff at the tip should be applauded. Not only are they very helpful and courteous to the public but they also ensure the tip itself is of kept clean to a very high standard. Well done!"
"Current provision excellent if you happen to live near a HWRC site. More sites are needed"
Example Customer Comments
"The current services offered by KCC in this sector are excellent and help reduce the chances of fly-tipping".
"The use of the local tip seems to be a valued and routine part of community life"
"Too many usable household items are disposed of. Australia has "Tip shops" where items salvaged from disposal are offered for resale to the public. If managed well, this service could be self-funding, and would recycle items otherwise destined to landfill."
"The opening hours should be extended for an hour or so, at least on a couple of days a week, in order to enable people to use the facility after work."

"Currently really helpful staff and we appreciate the ability to be able to recycle and dispose of our waste efficiently. Would be great to see the amount of waste being recycled to continue to increase as it has been."

"Open the tips for public use at different times to dustcart emptying as this causes lots of hold ups at my local tip. Also, possibly open and close later/earlier in the week so people can either go to tip before or after work too so making it not so busy at weekends".

"Have staff help people with disabilities (not everyone has visible disability) at the tips with their recycling as at my tip staff don't help even if shown disabled blue badge they make person struggle to do it themselves taking people longer to unload causing more congestion and longer waiting times."

"Kent has done an excellent job to improve recycling and reduce landfill".

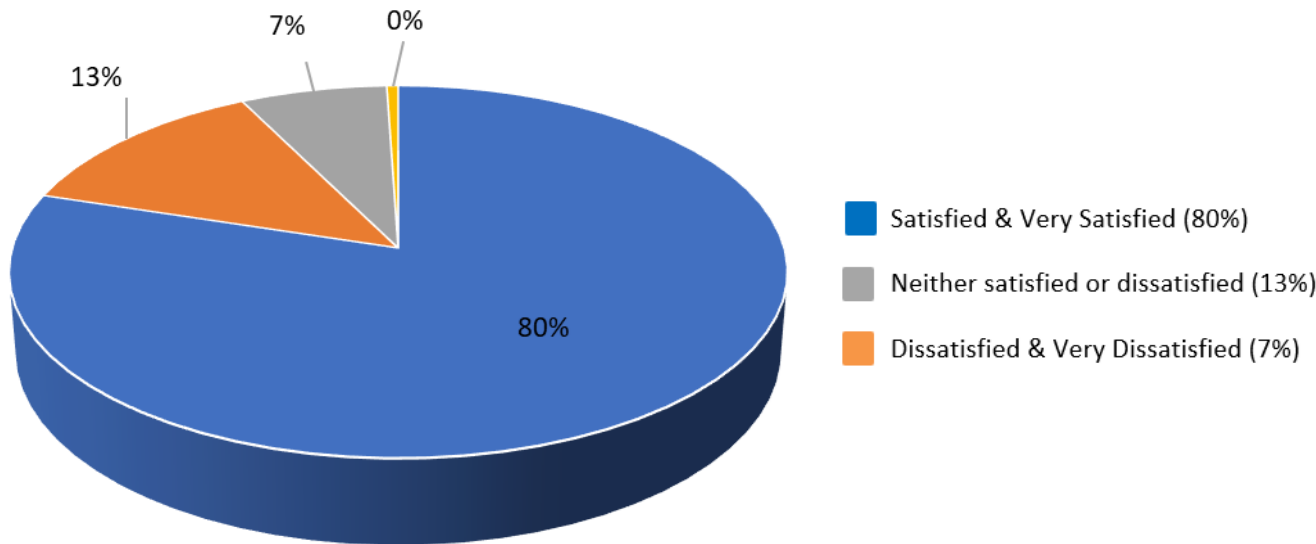
"We have used the Deal tip frequently after some home improvements. Charges would be very frustrating since we would feel we were dealing with matters responsibly. Just to add, we have always found the staff at the Deal tip very helpful."

"The current service is very good and would cause problems if changed."

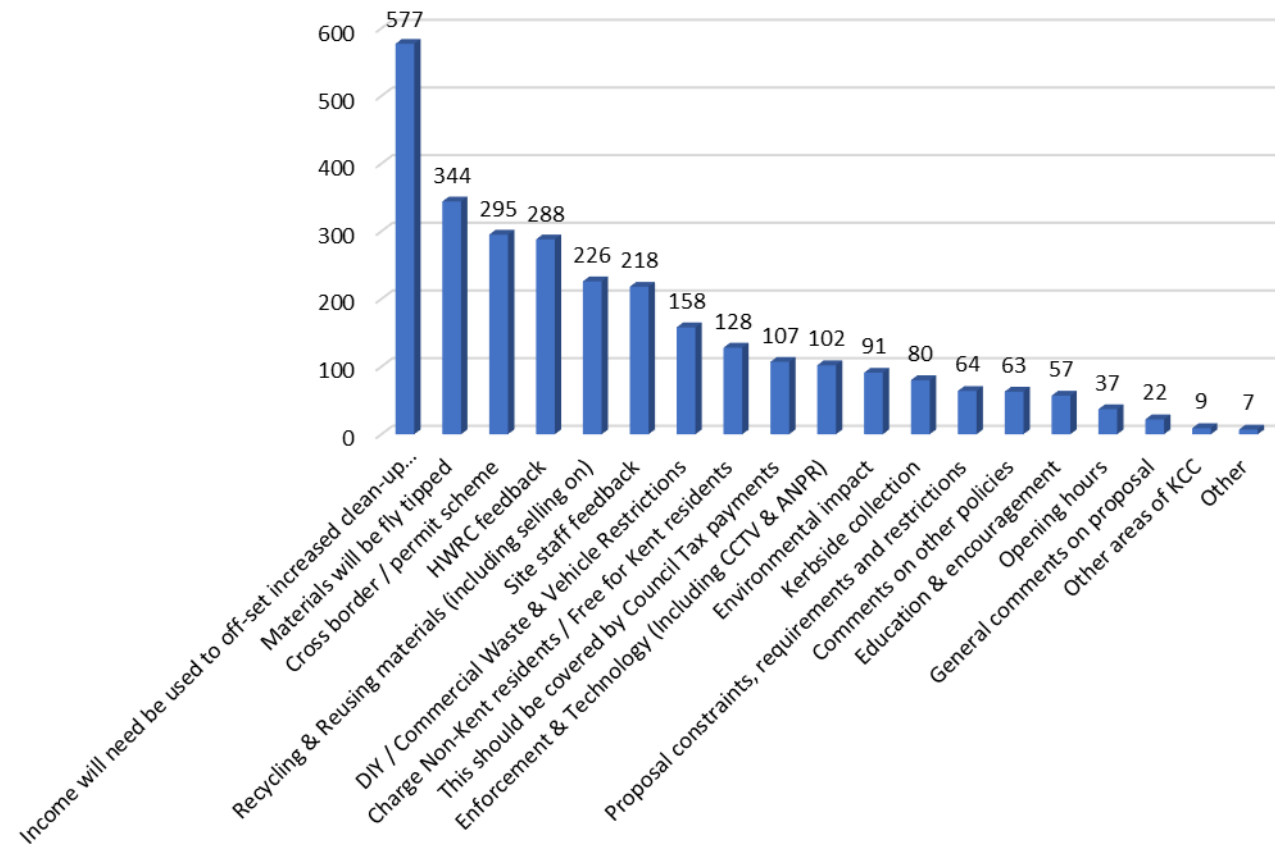
	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Very satisfied	979	18	997	1
Satisfied	1215	22	1237	2
Neither satisfied nor dissatisfied	347	10	357	3
Dissatisfied	145	4	149	4
Very Dissatisfied	43	1	44	5
Don't know	15	0	15	6
<b>TOTAL</b>	<b>2744</b>	<b>55</b>	<b>2799</b>	

#### Overarching summary:

- 99% of respondents answered this question
- 80% of respondents are satisfied (44%) or very satisfied (36%) with the HWRC service. 7% are dissatisfied (5%) or very dissatisfied (2%). 13% are neither satisfied nor dissatisfied.



**5.4 Do you have any further comments or suggestions you would like to make?**



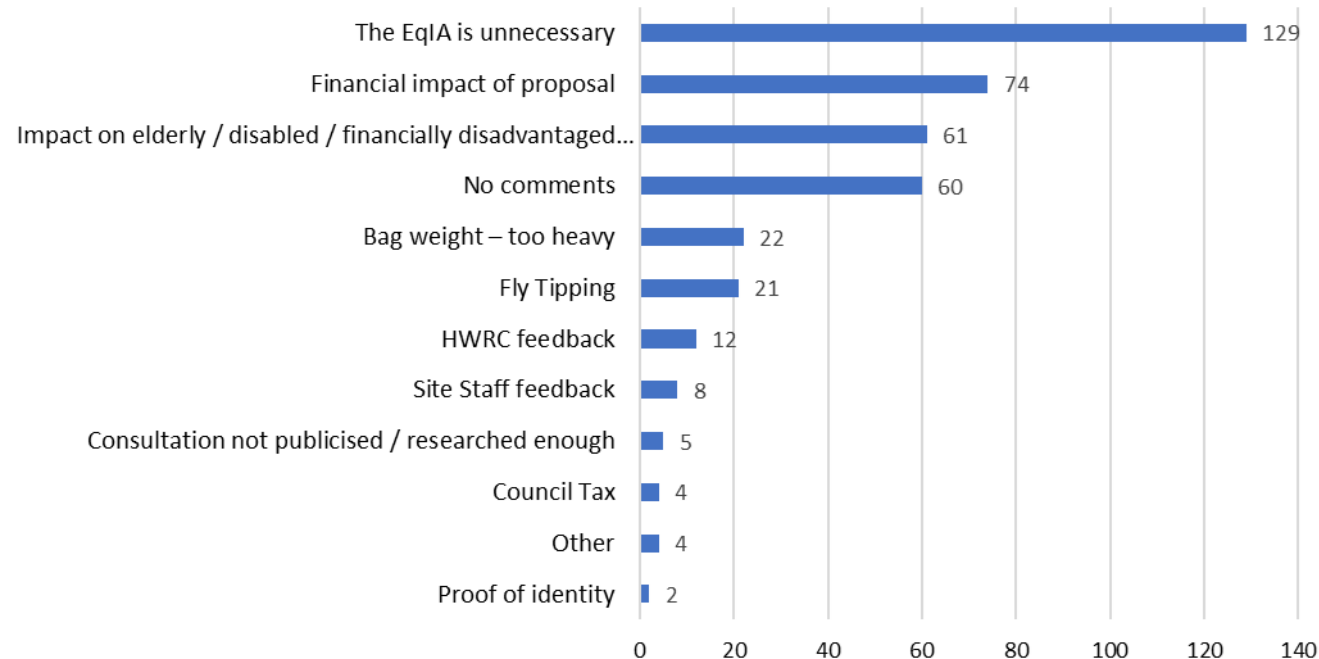
**Response summary:**

Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
Income received from charging will need to be used to off-set increased fly-tipping clean-up costs / charges too high	558	19	577	1
Materials will be fly tipped	323	21	344	2
Introduce a Cross border / permit scheme	289	6	295	3
HWRC feedback (45% positive, 18% negative, 37% neither/other)	281	7	288	4
Recycling & Reusing materials (including selling on)	222	4	226	5
Site staff feedback (57% positive, 33% negative, 10% neither)	216	2	218	6
DIY / Commercial Waste & Vehicle Restrictions	153	5	158	
Charge Non-Kent residents / Free for Kent residents	122	6	128	
This should be covered by Council Tax payments	103	4	107	
Enforcement & Technology (Including CCTV & ANPR)	100	2	102	
Environmental impact	88	3	91	
Kerbside Collection	78	2	80	
Proposal constraints	64	0	64	
Comments on other HWRC policies	58	5	63	
Education & encouragement	57	0	57	
Opening hours	33	2	35	
General comments on proposal	22	0	22	
Other areas of KCC	9	0	9	
Other	7	0	7	
<b>TOTAL</b>	<b>2784</b>	<b>88</b>	<b>2872</b>	

**Overarching summary:**

- 45% of respondents answered this question (1281 / 2841)
- 55% of respondents chose not to answer this question (1560 / 2841)

## 5.5 Do you have any comments about the Equality Impact Assessment?



### Comments from Stakeholders

“The EqIA fails to recognise the impact of a policy proposal that will place a financial incentive to overload heavy sacks of waste, rather than encouraging people to carry more sacks each containing a lighter load. This will have an impact which is disproportionate to the general population on older people, women (especially pregnant women), and people with mild disabilities, such as bad backs”.

“This proposal will have the effect of reducing the disposable income of both retired and disabled members of the community”.

“EqIA on waste disposal? What a waste of money”.

### Comments from Customers

“Would affect the elderly and disabled who rely on neighbours to take this sort of waste to the tip for them they won't be able to afford fees”.

“I believe that the proposals fail the above as it assumes everyone is capable of lifting full bags of rubble or if not, limits the amount that they may dispose because of their physical ability”.

“As an older resident I have trouble lifting heavy sacks of soil and rubble so in order to be able to lift them I put the soil in many sacks. Charging me for each sack will not be fair”.

“Older and disabled groups and women may be disproportionately impacted by a charge-per item policy if unable to lift heavier loads. I am a middle-aged woman and only dispose of stones/rubble from the garden in half-bucket loads due to the weight.”

“This will impact the poorest members of society as they are the demographic that are most likely to do home repairs themselves and not use commercial builders”.

### Response summary:

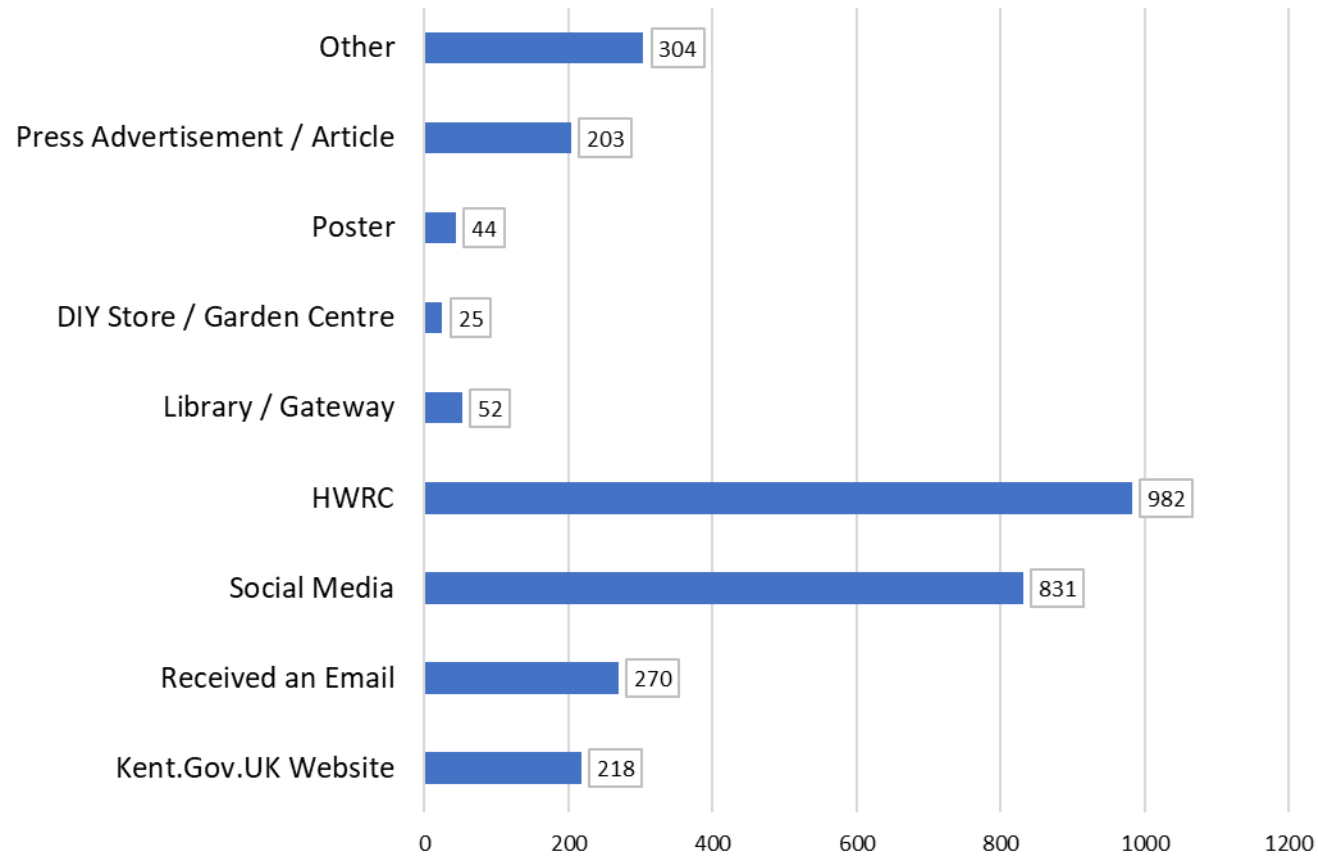
Theme of comments	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
The EqIA is unnecessary	124	5	129	1
Financial impact of proposal	72	2	74	2
Impact on elderly / disabled / financially disadvantaged residents	61	0	61	3
No comments	60	0	60	4
Bag weight – too heavy	22	0	22	
Fly Tipping	20	1	21	
HWRC feedback	11	1	12	
Site staff feedback	8	0	8	
Consultation not publicised / researched enough	5	0	5	
Council Tax	4	0	4	
Other	4	0	4	
Proof of identity	1	1	2	
<b>TOTAL NUMBER OF COMMENTS</b>	<b>392</b>	<b>10</b>	<b>402</b>	

### Overarching summary:

- 10% of respondents answered this question (290 / 2841)
- 90% of respondents chose not to answer this question (2551 / 2841)



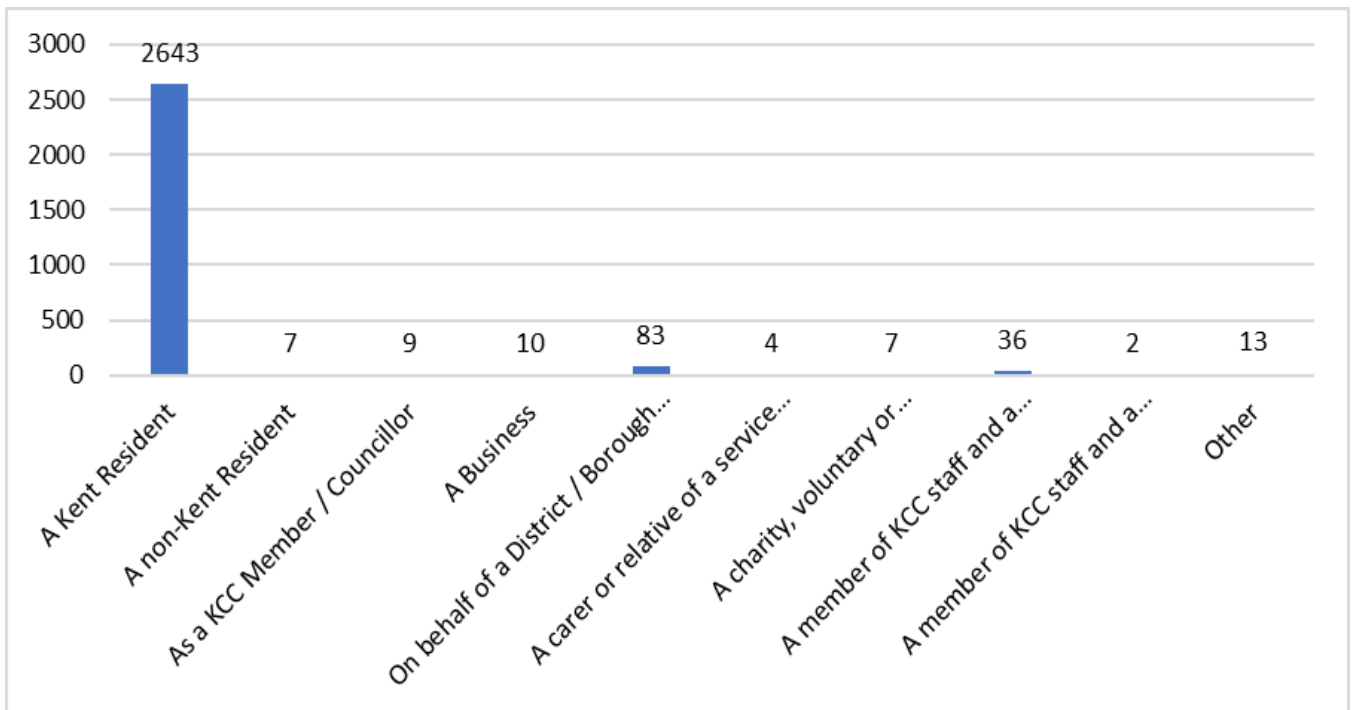
### 5.6 How did you hear about this consultation?



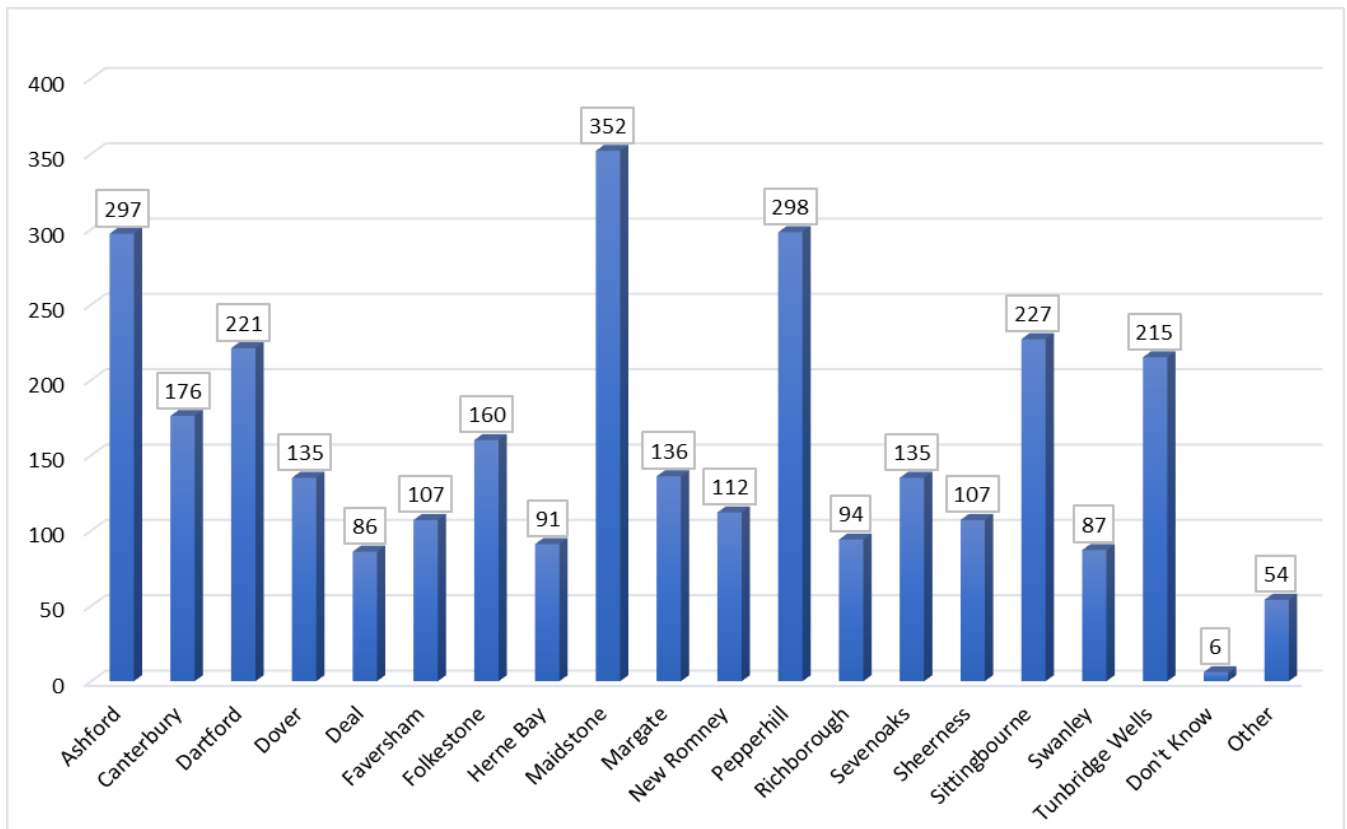
	Number of online comments	Number of paper comments	Total number of comments	Most popular comments - ranked
At a Household Waste Recycling Centre	958	24	982	1
Social media (Facebook, Twitter)	830	1	831	2
Other	290	14	304	3
Received an email	267	3	270	4
Kent.gov.uk website	213	5	218	
Press advertisement / article	198	5	203	
At a Library or Gateway	40	12	52	
Poster	42	2	44	
At a DIY store or Garden centre	25	0	25	
<b>TOTAL</b>	<b>2863</b>	<b>66</b>	<b>2929</b>	

## 6. CONSULTATION RESPONSES: 'ABOUT YOU'

### 6.1 Are you responding as.....

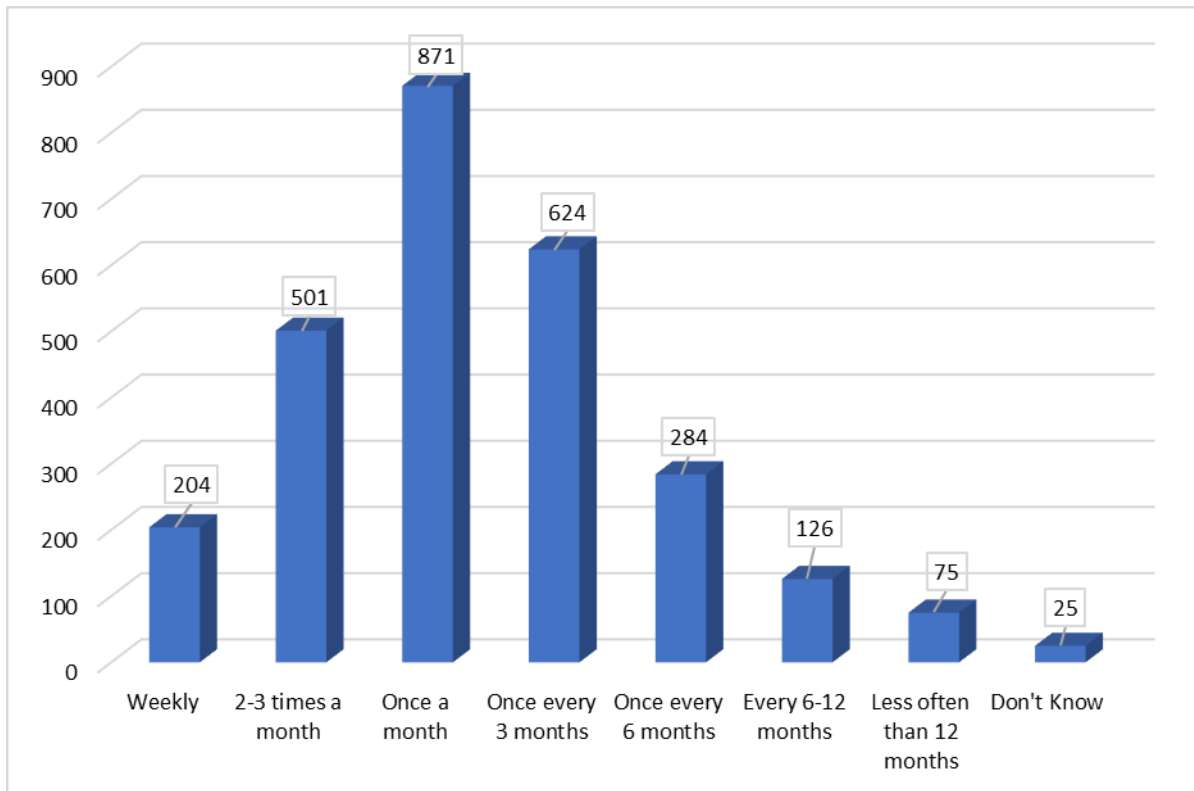


### 6.2 Which Household Waste Recycling Centre do you normally visit?



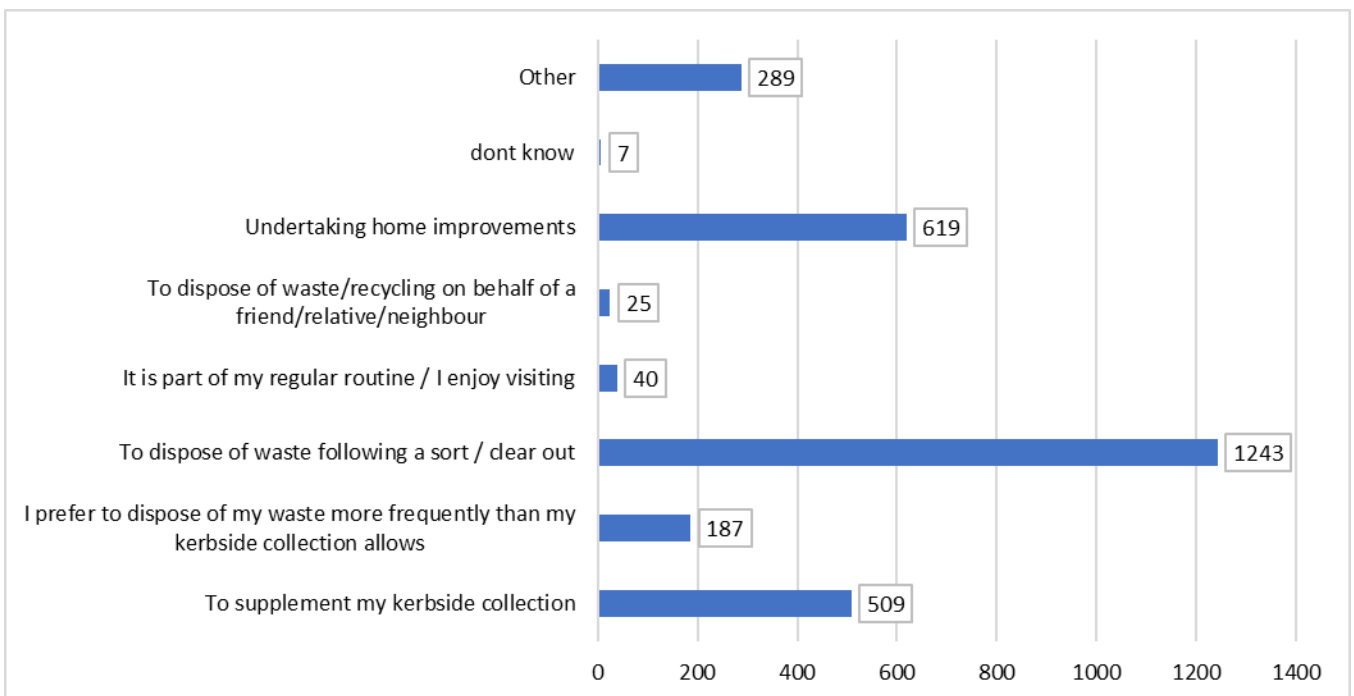
Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on the HWRC visited. However due to statistical validity it was not possible to analyse at this level of detail.

### 6.3 How frequently do you visit the HWRCs?



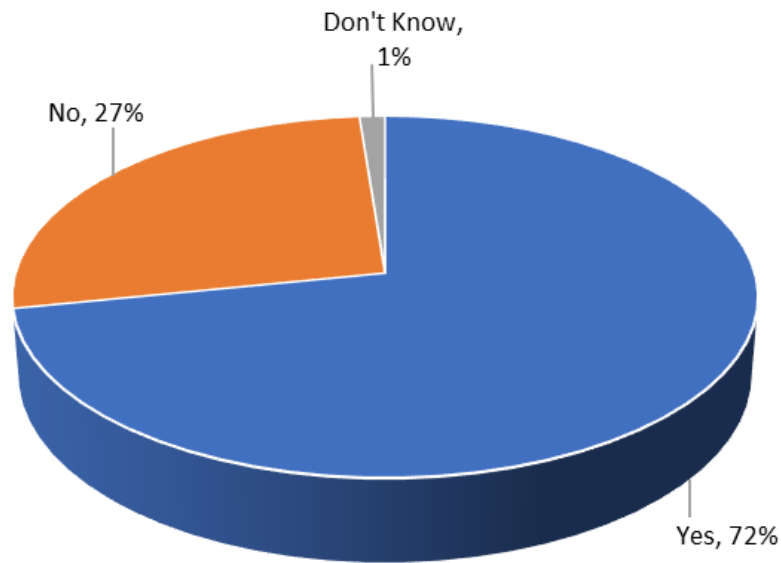
Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on the frequency of the HWRC site visited. Those respondents that use the sites more frequently (Once a month or more often) are slightly more likely to disagree, or strongly disagree with the proposal (87%) compared with those using the sites less often (82%).

### 6.4 What is the main reason for your use of the HWRC?



Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on those using the site after 'undertaking home improvements'. 92% of these respondents disagreed or strongly disagreed with the proposal compared with 85% of respondents overall.

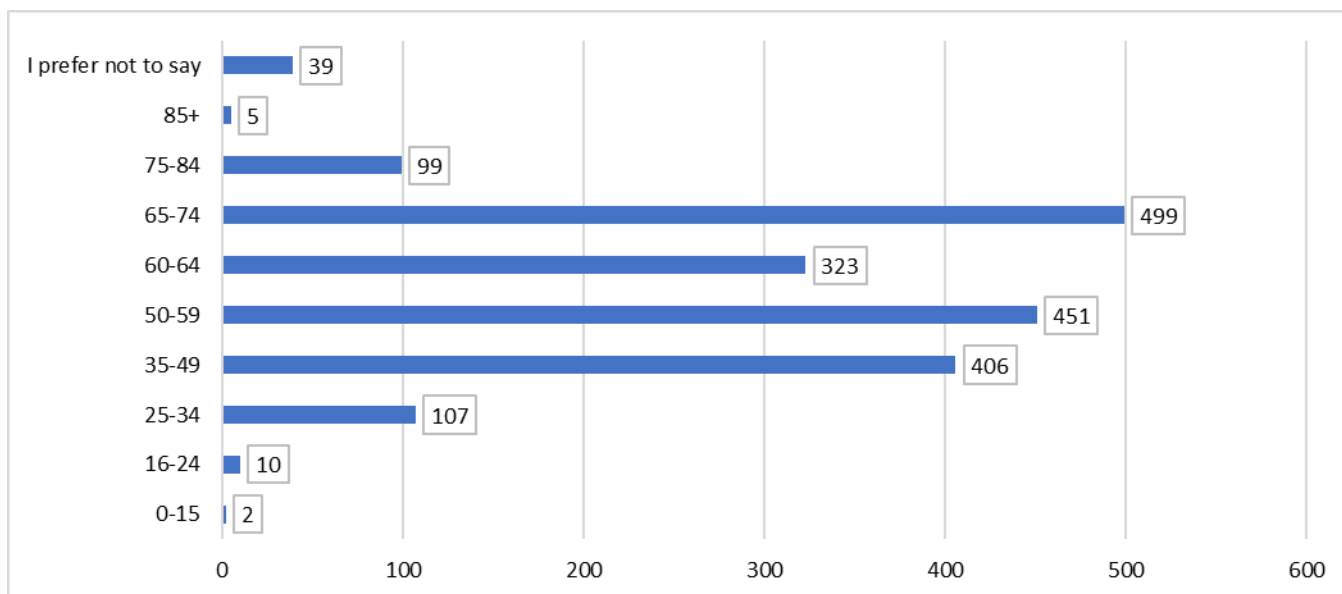
**6.5 Have you brought soil, rubble, hardcore and/or plasterboard to the HWRCs in the last two years?**



Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on whether the respondent had brought soil, rubble, hardcore and/or plasterboard to the HWRCs in the last two years. Those respondents that had brought these types of materials into the site in the last two years were significantly more likely to disagree or strongly disagree with the proposal (91%) compared with those who had not brought these materials into the HWRC's (69%).

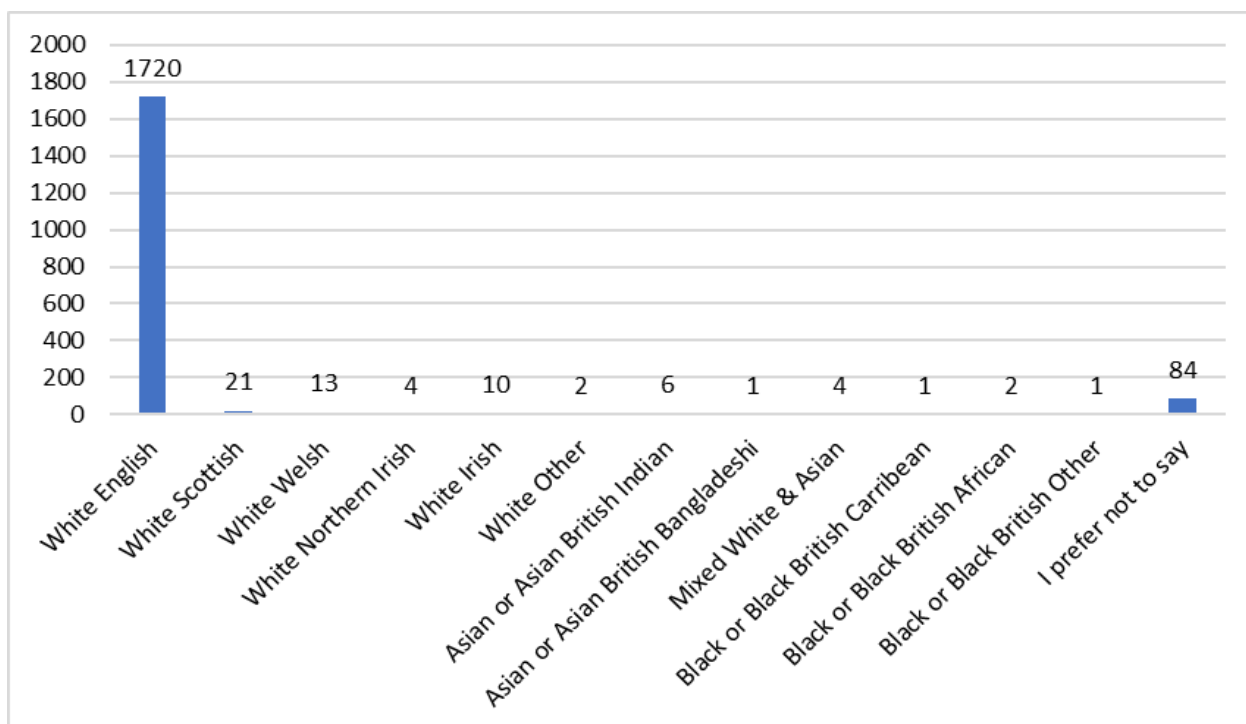
# CONSULTATION RESPONSES: 'MORE ABOUT YOU'

## 6.6 Age range



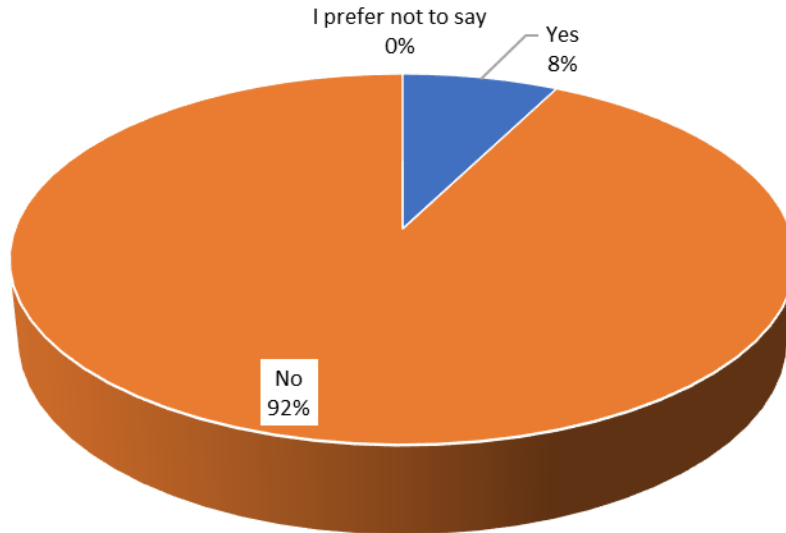
Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on the age of respondent. However due to statistical validity it was not possible to analyse at this level of detail.

## 6.7 What is your ethnic group?



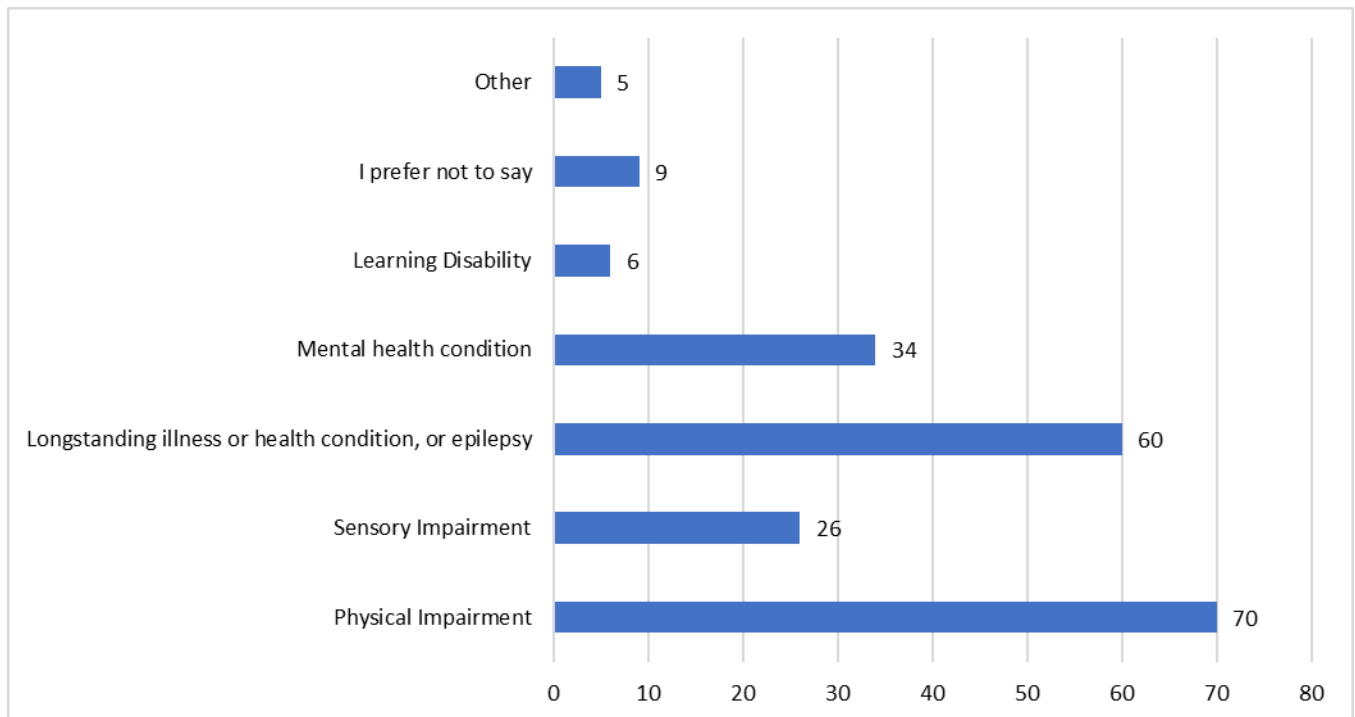
Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on the respondent's ethnicity. However due to statistical validity it was not possible to analyse at this level of detail.

## 6.8 Do you consider yourself to be disabled as set out in the Equality Act?

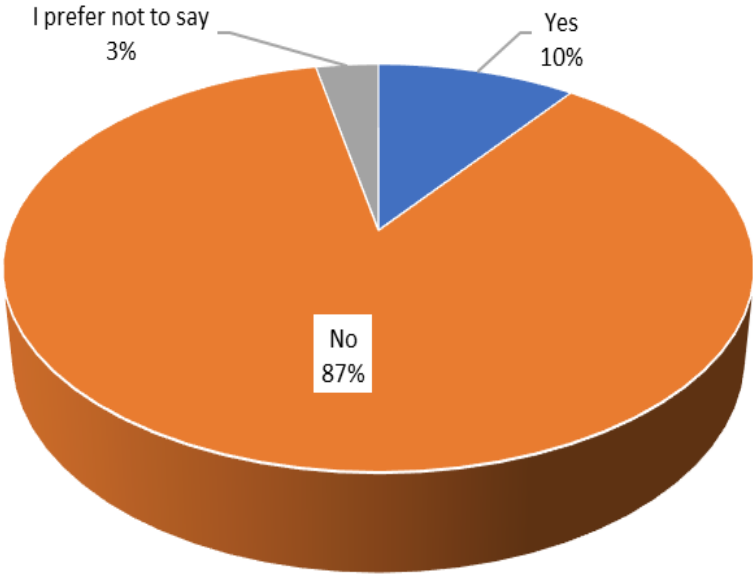


Further analysis was undertaken to understand if there were any differences with agreement of the proposal based on whether the respondent considers themselves to be disabled. However due to statistical validity it was not possible to analyse at this level of detail.

## 6.9 If yes, type of impairment



**6.10 Are you a carer?**



---

**END**