

Household waste recycling centres: DIY waste disposal charges and booking systems - North London Waste Authority Response

Link to consultation: <https://www.gov.uk/government/consultations/household-waste-recycling-centres-diy-waste-disposal-charges-and-booking-systems>

Closing Date: 4 July 2022

Proposal

To clarify in legislation when construction waste should be treated as DIY waste and should therefore be classified as household waste. We have set out in Appendix A the types of waste materials that might be included in DIY waste, however, this is a non-exhaustive list.

We consider DIY activities to include any construction work, such as building, decorating, or repairing activities, carried out by householders by themselves in their own homes. This would not include, for example, a whole house renovation, or any work done by a tradesperson, but it might include the householder tiling a kitchen, plumbing in a sink, plastering a room, building and installing shelving, building a raised bed for a garden etc.

The government's policy is clear that householders should not be charged to dispose of DIY waste at HWRCs. We propose that construction waste should be considered DIY Waste and classified as household waste in the 2012 Regulations when it meets certain criteria. We propose that these criteria are:

- The construction waste is produced by householders whilst carrying out construction works themselves at their home. Construction is defined in the 2012 Regulations as including improvement, repair or alteration.
- The construction waste is not produced as a result of commercial activities or by a commercial contractor charging for work in a domestic premises.
- The construction waste is of a volume, which is no greater than 300L (based on the approximate boot size of a family car).
- The construction waste is not produced on a regular basis requiring HWRC visits more frequently than once a week.

The proposed criteria are intended to allow householders to deposit DIY waste for free (as it should be treated as household waste) but for local authorities to still be able to charge for other construction waste, which is classified as industrial waste. For example, if a householder brought more than 300L of construction waste to the HWRC or brought 300L of construction waste to the HWRC on a regular basis, it would not be DIY waste and could be charged for. Equally, if a tradesperson brought any amount of construction waste, it would still be industrial waste.

6. Do you agree or disagree with these technical principles when the Government amends the 2012 regulations

NLWA disagree and believe the technical principles and the criteria proposed below need further consideration and thought.

Our HWRCs do not currently charge for householders to deposit DIY waste.

Each household can take up to six standard rubble sacks of soil/rubble to other RRCs each month. This includes concrete, brick, stones, pebbles, soil, sand and gravel. A standard rubble sack is 51cm by 76cm (20 inches by 30 inches) or equivalent.

We do not plan to introduce charges for DIY waste at the current time, though we would like to reserve the right to do so if the material we are expected to accept becomes excessive.

We would ask the Government, to consider the potential problems with seeking to classify 'DIY waste as construction waste'. On the Government website, the term 'construction waste' is used as an overarching category for insulation and asbestos materials, concrete bricks tiles and cement, bituminous mixtures, coal tar and tar soil, contaminated soil or gypsum (<https://www.gov.uk/how-to-classify-different-types-of-waste/construction-and-demolition-waste>). Hazardous material wouldn't be accepted at a waste transfer site. The Government should consider how it will engage residents to communicate that they are referring to basic household building waste outlined in appendix A and not some of materials in the category above. The proposed criteria currently do not safeguard against this, meaning there will potentially be increased abuse by traders and HWRCs will receive problematic materials that they may not currently have the means to dispose of.

NLWA would also question the implication in the consultation that charges for DIY waste at HWRCs more generally have led to a potential increase in fly-tipping. Last year, WRAP published a report, 'The relationship between fly-tipping rates and HWRC charging' ([WRAP's 2021 research](#)) based on over 12 months of research and analysis of local authority charges for 'DIY' waste and rates of fly tipping to establish whether there is an association. The conclusion from the report does not show that those local authorities that have introduced charges for some HWRC waste have higher fly-tipping rates than those without charges. Rather than seek to amend the classification of waste, we would urge Government to work with local authorities to tackle the root causes of fly tipping (evidence is that fly tipping arises as a result of pre-meditated actions and/or a lack of care over responsible waste disposal).

We would also highlight that these proposals will, to some extent, lessen the incentive to avoid generating waste in the first place. Whilst it is important to ensure that residents have a safe and responsible place to dispose of waste, the proposals do not support the principal of waste reduction or a shift in thinking around consumption to ensure that we are using all opportunities and measures to discourage waste creation. This is the only way to support efforts to meet the challenging UK environmental targets.

7. Given the Government's stated policy, do you agree or disagree with these tests on whether construction waste should be treated as DIY waste and classified as household waste, and should not be charged for when disposed of at a HWRC, when:

- The waste is produced by householders whilst carrying out small-scale construction or demolition works at their home

As the proposal stands, NLWA disagree with this criterion. NLWA agree in principal that householders should be allowed to dispose of a reasonable quantity of DIY waste at HWRCs, but feel that 'small-scale' is not an adequate definition. There should be a clear limit on the amount of waste that is accepted. The amount (300L) per week outlined below is very difficult to enforce (please see fuller explanation below).

- The waste does not arise from activities that generate an income for the person who carried them out

While NLWA agrees that work carried out by companies or contractors is clearly commercial and so should not be entitled to free disposal, this proposal is much more complex. For example, if a householder carried out DIY improvements which allowed them to gain income from letting a room, that would mean the work generated an income, but in practice this would be impossible to detect or enforce. Therefore, we are concerned about the definition of this test.

- The waste is not produced on a regular basis requiring HWRC visits more frequently than once a week.

NLWA disagree. Once a week is too frequent and the figure should be more infrequent (please see fuller explanation below).

- The volume of waste is no greater than 300L (based on the approximate boot size of a family car).

NLWA disagree, and feel the limit of up to 300L is extremely hard to enforce as most car boots are larger than this (please see a fuller explanation below)

8. If you have disagreed with the inclusion of any of the above criteria, please state why, indicating which part of the criteria you are referring to in your response.

NLWA agree in principal that small-scale basic household DIY waste produced by householders whilst carrying out small-scale construction or demolition works at their home should not be charged for.

Despite being the UK's second largest waste authority, serving over 2 million residents, NLWA receives no comments or complaints from residents concerning the disposal of DIY waste. This suggests that there is no need to introduce heavy handed requirements when current arrangements successfully serve local needs. This is an issue where local authorities are best placed to determine arrangements which respond to local circumstances, the capacities of the HWRCs.

The proposals combine a curious mixture of very specific plans and vague rules. These will undoubtedly create confusion and problems on site. An example of a very specific proposal is the suggested limitation of DIY waste to 300 litres per week. However, the majority of car boots are larger than 300 litres, therefore this does not seem a practical limit which will be readily appreciated by residents. An example of a vague rule is the proposal that eligible waste should be that produced by householders whilst carrying out small-scale construction or demolition works at their home – it is in practice impossible to ascertain the scale of works from the waste delivered to an HWRC.

Local authorities are in a position to balance the requirements of successful management of HWRCs while meeting residents' needs. By seeking to override local arrangements, there is a severe risk of introducing inflexible requirements with unintended consequences which cause more problems than they solve.

9. Do you have any other views on the technical circumstances in which construction waste should be considered DIY waste and classified as household waste?

As stated above, there are problems with treating DIY waste as 'construction waste', when the former term encompasses waste materials. The definition includes hazardous waste

which we would not be able to accept. Some of the materials in appendix A are also potentially hazardous. The terms need better definition, and the list (appendix A) needs to be reviewed.

As highlighted above, we would emphasise again that these proposed limits will be very difficult to enforce. It is difficult to use CCTV or ANPR to monitor the amount of DIY waste each householder brings. The consultation suggests that where a resident is renovating a whole house this material could be charged for – this is not going to be possible to monitor in practice. It could lead to residents breaking up loads into smaller amounts and will generate more trips and more carbon emissions for the same eventual volume of material. The only way to establish whether a householder is making frequent visits is through a well-managed booking system, but the second part of this consultation is proposing this should be reviewed and possibly disbanded. The booking system also gives us notice to prepare, and ensure adequate staff and containers are on hand to meet expected demand and help people recycle/dispose of DIY waste properly.

The consultation states that it is important that local residents are able to dispose of their rubbish in a responsible and convenient manner. We would argue that this precisely the service which we and other local authorities provide.

Call for evidence on booking systems at HWRCs

11: Do you currently have a HWRC booking system in place?

- Yes
- No

12: What type of booking system do you operate?

- Residents contact us to book a specific slot
- Residents use sites at certain times based on address, number plate, etc.
- Other (please specify)

13: Please outline the key reasons why you have a booking system in place

In March 2020, as part of the first national lockdown, our RRCs were required to close. On 13 May 2020, RRCs reopened in north London. NLWA and its contractors introduced temporary changes to the RRC operation including the new booking system. These were designed to help residents and staff maintain social distancing and avoid extensive queuing and disruption affecting roads around sites when capacity at the RRCs was limited.

Besides those specific to the pandemic, the introduction of the booking system has had some demonstrable benefits, which has contributed to the decision to keep it in place:

- **Increased predictability and reduced waiting times for residents:** When residents book a slot, they know that they are guaranteed timely access to the site where they have booked. Queues have previously been a feature at sites during summer and bank holidays. The booking system has reduced instances of this, meaning residents have not had to spend lengthy periods waiting to access sites.
- **Better data on visitor numbers:** The booking system gives us a regular accurate analysis of the number of visitors. Prior to 2020, visitor numbers were assessed by surveying every three years.

- **Service efficiency and capacity:** Operationally, the booking system improves our service offer. Adequate staff and containers are on hand to meet expected demand and to help people recycle properly.
- **Better Communications:** The booking system has enabled effective and targeted communications with residents, encouraging them to use the service to recycle items and prevent waste.
- **Improved flow of materials:** The booking system has enabled a steady and managed flow of material into sites which allows material to be directed to the right place.
- **Consistency of arrangements for visitors:** Prior to the introduction of the current booking system, the authority had operated a booking system for vans only. This was necessary to guard against commercial waste being improperly deposited at RRCs. If the comprehensive booking system ceased, the authority would revert to operating a van booking system.
- **Better user experience** The ease and popularity of the booking system has been tested with users. 43% of residents surveyed in July 2020 agreed the bookings system had improved their experience of the RRC, with a further 34% indicating it had no impact on their experience. It would be more complex to survey those who have not used the system but wished to visit RRCs. Only 9 enquiries concerning the booking system were received in 2021/22 and no complaints.

Our Members are aware that while the booking system has improved the onsite experience, it is also important that residents are not put off from using sites because of the booking system being perceived as a bureaucratic obstacle. Therefore, residents can arrive without bookings and will be able to gain access to the site if there is capacity. In addition, we continue to keep the booking system under review and will cease to use it if it becomes apparent that it is unnecessary or detrimental to residents.

13: Please outline the key reasons why you do not have a booking system in place.

N/A

15: What are your future plans for the booking system?

X retain indefinitely – subject to ongoing review and continued consideration of the benefits of the system

16. Please outline any evidence you have on the impacts of the booking systems on recycling levels in your area

The recycling rate from HWRCs over the years of the pandemic has stayed relatively stable (71.12% in 2019 and 71.39% in 2021). This suggests the booking system is not having an impact on recycling levels at RRCs in the north London area.

There has been a drop in tonnage and visitor numbers at RRCs. There are other factors that could be influencing this. Our boroughs' service offers have evolved and become more resident-focused. For example, kerbside services increasingly include the collection of small electrical items, textiles and garden waste (chargeable) residents can also book household bulky waste collection service. We would also highlight that community skips are now provided in our area, and these are free to use, making it easier to deposit rubbish responsibly elsewhere.

There are some indications that reductions in visitor numbers and tonnages are also a result of a reduction in inappropriate commercial and industrial waste being deposited at sites.

The consultation document states there are increasing concern that in some cases booking systems are discouraging HWRC use, with a risk of both increased residual waste and fly-tipping as a result. We have looked at Borough generated data and have not seen any evidence of an increase in fly-tipping since the booking system has been in place. Moreover, behavioural evidence is that fly tipping arises as a result of pre-meditated actions and/or a lack of care over responsible waste disposal. Therefore, a brief administrative process to book a slot at RRCs is unlikely to be a decisive factor in causing fly-tipping.

17. Please outline what other restrictions, if any, you impose on residents bringing waste to your HWRCs? For example, limits on size or on vehicle type can use.

There is a height restriction barrier at most our RRC sites (generally 1.85m). At some sites, the height barrier will be opened for cars or vans above this height.

As above, each North London household can take up to six standard rubble sacks of soil/rubble to an RRC each month. This includes concrete, brick, stones, pebbles, soil, sand and gravel. A standard rubble sack is 51cm by 76cm (20 inches by 30 inches) or equivalent.

Trade (commercial) waste is not accepted at any of our RRCs. However, we have created a list of local facilities that do accept trade waste.

18. Do you use measures such as ANPR or similar approaches at your HWRCs?

We do not use ANPR at our HWRCs.

Barrowell Green RRC (operated by Enfield Council) is monitored by Automatic Number Plate Recognition and CCTV cameras are in operation 24 hours a day.