Appendix A

<u>HWRC Consultation – Response from City of York Council</u>

In response to the consultation, the Council has some significant concerns about the proposals as they stand regarding 'DIY waste'.

Firstly, it will be very difficult if not impossible for local authorities to effectively manage and police the scenario as described in the consultation; where householders can dispose of DIY waste free of charge providing it is involving building, decorating or repairing activities. The Council is of the view that the proposals as they stand will lead to significant numbers of businesses who undertake commercial work requesting that householders dispose of the waste from their commercial activities through the 'DIY waste' route.

The risks to the approach set out in the consultation are that it could lead to an increase in the incidence of fly tipping as a means for disposing of such waste and a greater demand being placed on the HWRC's (i.e. if householders are making more journeys to use HWRC's). This could also lead to a higher number of journeys to HWRC's which will increase demand on the sites and increase the number of journeys required to dispose of materials at HWRC's; thereby having a negative effect on both waiting times and a negative environmental impact through possible increased trips/journeys.

If the proposals were to be implemented as per the consultation then the Council would not have the resources available to administer the requirement to manage the amount of householder trips to dispose of DIY waste without increasing its costs. In addition, the situation will be almost impossible to effectively manage if trips are permitted weekly.

The current charging structure permits local authorities to charge for construction waste. This not a penalty but merely a recognition that treating and disposing of bricks, rubble, plasterboard etc is a costly process. The charges are predominately aimed at trades who legitimately should be charged for disposing of their construction waste but does also cover householder disposal. One of the risks that the proposed approach could generate is if traders undertake work at a resident's property they could leave the waste for householders to dispose of as 'DIY waste'. This scenario would then materially affect the amount of income at HWRC's and require local authorities to absorb higher costs than they do at present.

The Council does not agree with the proposals as they stand and feel that if this change is implemented, it would be a retrograde step in the effective management and operation of household waste recycling centres.