

Place and Environment Scrutiny Committee
Tuesday 31st October 2023

Report Title	Delivery of Household Waste Recycling Centres (HWRCs) from April 2025
Report Author	<p>Senior responsible officer: Lesley Elkington – Business Support Manager (Waste) Lesley.Elkington@northnorthants.gov.uk</p> <p>Report author Steve Smith – Assistant Director Highways & Waste (Interim) Steve.M.Smith@northnorthants.gov.uk</p>

Are there public sector equality duty implications?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information (whether in appendices or not)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972	

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Appendix A – HWRC Options Appraisal – SLR Consulting Ltd

Appendix B – Equalities Screening Assessment

1. Purpose of Report

- 1.1. North Northamptonshire Council (NNC) has reviewed the Household Waste Recycling Centre (HWRC) operations ahead of the current outsourced arrangements ending on 31st March 2025. This has identified the provision required from 1st April 2025 to maintain HWRC facilities for the residents of North Northamptonshire.
- 1.2. This report considers the outcome of the NNCs HWRC Options Appraisal undertaken in summer 2023, which was a required outcome of the Waste Management 3-Year Plan 2022-25 approved by Executive in September 2022.

- 1.3. This report seeks agreement of the proposed operating model for HWRCs from 1st April 2025, which will go to Executive on 16th November 2023, and seeks approval for the Waste Management service to undertake necessary procurement activities to secure necessary contracts to support that operating model.

2. Executive Summary

- 1.1. NNC has four Household Waste Recycling centres (HWRCs) which are operated on a legacy Northamptonshire County Council contract which ends on 31st March 2025. As such NNC has been reviewing the HWRC operation and what is required from 1st April 2025 to meet the needs of North Northamptonshire residents.
- 1.2. In reviewing the operating model for services from 1st April 2025, the Waste Management team commissioned an Options Appraisal of the HWRC provision to advise on the future of the service. The Options Appraisal was undertaken by SLR Consulting in Summer 2023.
- 1.3. The Options Appraisal identified that the existing network capacity is acceptable based on current demand, with the HWRCs located within a good travel distance. However, the facilities themselves require attention to enable them to better utilise their footprint and allow them to maximise their waste collection and maintain customer satisfaction and to meet future demand.
- 1.4. The Options Appraisal also looked at the potential for bringing the Service in-house or maintaining an outsourced service. Based on the information available, the high-level modelling and assessment conducted, consideration given to timescales, internal resources, capability and indicative costs, it has been recommended that an outsourced service delivery model should continue to be the preferred approach to the next phase of service delivery.
- 1.5. The reasons identified for this recommendation are:
 - 1.5.1. Based on the options appraisal, there is insufficient time to put in place an in-house model by April 2025.
 - 1.5.2. An insourced service is likely to cost between 5-7% more per annum than an outsourced service which would be in the region of £140,000 more expensive to the council which would place greater pressure on council budgets.
- 1.6. It is recommended that NNC secure a new contracted service with at least the same service level as is currently in operation. This would maintain the same opening hours, days, access, and material accepted. Utilising the procurement process, it is recommended that the Council seek to enhance customer satisfaction while ensuring affordability, with the overall objective to provide reliable and efficient services.

- 1.7. The specification for the new arrangements will also need to reflect:
- The Council's statutory duties;
 - The Council's financial position;
 - The Council's Waste Strategies;
 - Information gathered as part of a market engagement exercise;
 - Information gathered as part of research into best practice.
- 1.8. The final provision will need to reflect the councils Medium Term Financial Strategy and be affordable within projected budgets. Depending on actual costs received through the procurement process, the final specification may need to be amended to be contained within available budgets.
- 1.9. The Options Appraisal has reviewed each of the sites against good practice guidelines (Household Waste Recycling Centre Guide, WRAP, 2018) and while all sites would benefit from some improvement works, the Options Appraisal has highlighted some significant limitation on our sites at Corby and Wellingborough. The limitations are principally based on being constrained by their footprint and recommends NNC seeks expansion of these sites to meet future demands.
- 1.10. The Options Appraisal has outlined potential improvements and necessary investment actions for the HWRC operation in the medium and long term to keep pace with the growth of housing and the population of North Northamptonshire. This will enable NNC to consider the capital investment required for future-proofing the HWRC services.
- 1.11. Officers will develop an HWRC Strategy to be brought to a future Scrutiny and Executive meeting to ensure a roadmap for future HWRC provision to meet population growth.
- 1.12. The Executive have previously given approval for the procurement of a contract for residual waste disposal across waste collection and HWRC's. Reuse, recycle and organic waste disposal from the HWRC's will be included within the HWRC contract.
- 1.13. This report marks the completion of the HWRC Options Appraisal as required under the Waste 3 Year Plan 2022-23.

3. Recommendations

- 3.1. The Place and Environment Scrutiny Committee is being asked to support the recommendations going to Executive on 16th November 2023, being:

3.2. Approve commencement of procurement of the Council's future HWRC contract.

3.2.1 Approve that the operation of HWRC facilities in North Northamptonshire will be delivered under an outsourced operating model for a duration up to 15 years.

3.2.2 Approve the extension of the current lease for Corby HWRC by 3 years to enable a review to be undertaken for alternative provision in the area.

3.2.3 Approve officers undertaking a review of alternative provision at Corby to consider the sourcing of a new lease for, or purchase of new or existing land, or utilisation of existing council owned land, dependent on which provides the greatest value to both the council and delivery of the service, on which to provide a HWRC facility in the vicinity of Corby.

3.3. Delegate authority to the Executive Member for Highways, Travel and Assets, in consultation with Executive Director for Place & Economy, Executive Member for Finance and the Executive Director for Finance, the authority to take any further decisions and/or actions required in connection with the procurement and award of the HWRC contracts, without the need to return to the Executive.

3.4. *Reason for Recommendations –*

- The proposed option most closely aligns with local government reform and transformation outcomes for Waste Services in North Northamptonshire.
- The recommended course of action will allow the council to secure the most cost-effective, solution for North Northamptonshire residents.
- This approach enables the Council to make informed decisions regarding its medium- and long-term financial planning for its Waste Management services.
- This approach ensures the Council has legally procured and has a compliant contract in place for the provision of services, that provide a direct benefit to residents in disposing of their waste.

3.5. *Alternative Options Considered –*

- The alternative to procuring an HWRC contract would be for the Council to enter the HWRC sector by running its own facilities however it is considered that the lengthy lead in times and additional cost make this prohibitive.
- The council could seek to jointly procure a new shared contract with West Northamptonshire Council to reflect existing arrangements however this could constrain the council's ability to make decisions which best fits the future needs of North Northamptonshire.

4. Report Background

- 1.14. North Northamptonshire Council (NNC) has a statutory duty under the Refuse Disposal (Amenity) Act 1978 “to provide places where refuse, other than refuse failing to be disposed of in the course of a business, may be deposited at all reasonable times free of charge by persons resident in the area...and to dispose of the waste so deposited”
- 1.15. Whilst there is no statutory minimum number of HWRC’s that an authority is to provide, recommended guidance (Household Waste Recycling Centre Guide, 2018, WRAP), state a “maximum catchment radii of three miles in urban areas and seven miles in rural areas covering the great majority of residents”. In addition, “Maximum driving times for the great majority of residents of 20 minutes in urban areas and 30 minutes in rural areas; although preferably less than this by the order of 10 minutes in each case.”
- 1.16. The current Household Waste Recycling Centre (HWRC) management contract commenced on 1st April 2010 and is a 15-year contract, ending on 31st March 2025. The current contract was procured by the former County Council for the whole of Northamptonshire and includes a network of nine HWRCs, four of which are in North Northamptonshire. NNC hosts the HWRC Contract and runs the contract management on behalf of West Northamptonshire Council (WNC), via an Inter Authority Agreement (IAA) until the contract and IAA ends in 2025.
- 1.17. The current contract is managed by a client team in NNC, with a dedicated Waste Management Officer being supported by a Waste Contracts Officer, a role that is currently vacant in NNC and under the IAA, support is supplied by WNC. In 2025 NNC will need to make arrangements to cover that work within its own client team.
- 1.18. There are four North Northamptonshire HWRCs located in Corby, Kettering, Rushden and Wellingborough.

- 1.23. All sites offer a reuse facility with local agents taking items for onward sale in local shops or via online Auction Houses. Ace Reuse operate the service for Kettering, Rushden and Wellingborough, while Corby is served by RecycleSmart.
- 1.24. NNC Commissioned an Options Appraisal to explore whether the current service has capacity to meet the needs of a growing population in North Northamptonshire, and if the current infrastructure is fit for purpose up until 2040. The appraisal also explored if there were opportunities for financial savings for NNC, and what options exist to improve and future-proof the HWRC.
- 1.25. The Options Appraisal reviewed and assessed:
- i. Capacity and the optimum location and number of HWRCs to meet future service requirements in accordance with industry standards, best practice, affordability and the Council's local requirements.
 - ii. Current Services and Policies, opening days and hours to maximise efficiency, customer satisfaction and the current e-permit scheme and recommended other schemes and their benefits.
 - iii. Potential Service and Policy changes NNC may consider such as an electronic booking system or other similar permit options to manage access, cross border access.
 - iv. In-house or outsourced delivery models; and
 - v. Options for the locations of any new/replacement facilities.
- 1.26. The Options Appraisal shows:
- 1.26.1. The existing network capacity is acceptable based on current demand, with the HWRCs located within a good travel distance being less than 30 minutes for 98% of North Northants residents. The facilities themselves require attention to enable them to utilise better their footprint and allow them to maximise their waste collection and maintain customer satisfaction and to meet future demands.
- 1.26.2. Benchmarking activity indicates that the current provision and operating policies appear comparable to councils with similar geographic and demographic characteristics, however on a total number of households per HWRC basis North Northamptonshire is on the high side and with growth in households could cause the capacity at existing sites to be unsustainable.
- 1.26.3. Modelling indicates that the existing network capacity is acceptable based on current demand but would not cope with a reduction from four to three HWRCs in their current design. None of the remaining facilities could feasibly absorb the forecast displaced material volumes should a site close.

- 1.26.4. Modelling suggests a potential increase in tonnage demand on the HWRC service of c.26% /c.7,000 tonnes by 2040 which will put pressure on the existing HWRC provision and layout configurations.
- 1.26.5. Benchmarking activity indicates that the current provision and operating policies are reasonable in comparison to councils with similar geographic and demographic characteristics, however on a total number of households per HWRC basis North Northamptonshire is close to ideal with 39,114 households per HWRC compared to typical best practice of 1 for every 39,000 households but planned household growth may cause the existing sites to become unsustainable in the future should housing growth rates continue.
- 1.26.6. The review of current infrastructure shows that it will not be fit for purpose by 2040. NNC therefore need to undertake improvements at all sites with significant investment required for Corby and Wellingborough, both constrained to challenging site footprints. This makes access for site users and adaptation to future service demands more challenging.
- 1.26.7. Opportunities for financial savings for NNC are limited as the current level of service and network are seen as being required at the current level, and in need of enhancement in the future, this provides little scope for saving. Analysis of forecast cost differences between inhouse and outsourced options indicated that in both instances the cost of new service provision is anticipated to increase.
- 1.26.8. The review of In-house or Outsourced delivery models, looked at the service delivery, revenue generation and retention, staffing, service delivery costs, customer satisfaction, flexibility on service changes, service management, risk management (financial and other), governance, upfront costs and performance.
- 1.26.9. This leads to a recommendation of continuing an Outsourced service, this is due to:
 - i. The Council having a long history of delivering the HWRC provision through a contract with an external service provider, currently Urbaser.
 - ii. In house service, whereby the service use wholly in-house resources, i.e., staff employed directly by the respective Council using vehicles and/or equipment which are paid for by the Council is currently used by only a small proportion of local authorities in England. The in-house delivery model is far more prevalent in Wales and Scotland.
 - iii. Provision of an insourced service is anticipated to cost c.5-7% more per annum.

- 1.27. The Options Appraisal has clearly identified there is a need to maintain a facility in the vicinity of Corby, as such there is a need for NNC to either secure a new lease for the current site or to source another site within the vicinity. Without a Corby site some residents of North Northants would be required to travel over 30 minutes to access an HWRC, and the remaining 3 sites would have insufficient capacity to service the additional visitors.
- 1.28. The Options Appraisal provides background, narrative and advantages and disadvantages of possible changes to NNC HWRC services. This forms a solid base to explore any future changes within a HWRC Strategy.
- 1.29. An HWRC Strategy should review and assess the potential changes to the service and infrastructure in line with the Council's consultation policy and develop a medium to long term plan for implementation of required changes and improvements. This should include but not be limited to items reviewed in the Options Appraisal such as:
 - i. Opening days and hours to maximise efficiency, increase user/customer satisfaction.
 - ii. Electronic booking system or other similar Residents only permit options to manage access.
 - iii. The current e-permit scheme and recommend other schemes and their benefits.
 - iv. Legislation changes that provide new opportunities to increase the opportunities to recycle or reuse at the HWRCs
 - v. Options for Infrastructure Investment at existing sites and the locations of any new/replacement facilities.
 - vi. Further consideration of inhouse-Outsourced services If an inhouse operation is desired it can set out the full business case and set a timeframe that NNC can achieve to deliver.

5. Issues and Choices

- 5.1 The In-house or Outsource operating model has been explored via the Options appraisal, which included benchmarking and using available industry data to identify higher costs of an In-house service. Procuring an outsourced service will allow a competitive price will be achieved via formal procurement competition.
- 5.2 Higher costs for an insourced model arise as a result of the need to have additional specialist staff in place who are able to ensure that HWRC's sites and operations remain legally compliant under environmental, health and safety and waste regulations, Similarly, external providers will have access to specialist and at times bespoke software systems. These are resources which external providers are able to spread the cost of across multiple contracts waste contracts and not just HWRC's. An outsourced contract would be responsible for disposal of reuse, recycle and organic materials for which they would take a dynamic approach to resale of the various commodities and reduce their risks through having direct control over contaminated waste. The

Council would have neither the skills nor the capacity to undertake such a dynamic approach to waste disposal and therefore would need to seek to separately outsource non-residual waste disposal which would be at an increased cost due to the inability to offer dynamic marketing nor assured quality control.

- 5.3 It is considered that the timescales to recruit specialist staff, develop an inhouse delivery model, identify and procure appropriate software systems and ensure all relevant certification and permitting is in place would take at least 2 years were the council to have a full client team currently in place. There is not yet a full team in place to provide the capacity to undertake the work and so is likely to take longer whilst either in-house or consultancy capacity is recruited. There is therefore insufficient time before the end of the current contract to have the structure in place to insource the service.
- 5.4 By contracting out NNC, will share risks associated with running services and have potential for seeking greater financial returns from recyclate sales as contractors will have access to better/larger established brokerage services.
- 5.5 NNC need to consider the renewal of the lease at the existing Corby HWRC site or find alternative land which does not adversely affect accessibility. Renewal at the existing site needs to be explored alongside increasing the footprint of the site to allow reconfiguration on the site to accommodate the current and future volume of visitors and traffic. While finding a new site may achieve the increased footprint, it may have permit and planning limitations which makes it unachievable by 1st April 2025. Both options have a cost implication, and this is being explored with the NNC property team.
- 5.6 Section 51 of The Environmental Protection Act 1990 places a duty on Councils to provide Household Waste Recycling facilities. There is no mention of the number of facilities needed, just the requirement for them to be 'reasonably accessible to persons resident in the area.' Good practice indicates residents should be within 30 minutes' drive of a HWRC. Removal of a site at Corby would mean some residents of North Northamptonshire would be beyond that 30-minute drive time.

6. Next Steps

- 1.30. Present a report to the Executive on the 16th November 2023 where they will be asked to approve an outsourced HWRC service for a duration up to 15 years, with reasonable break clause/extension review points, to check NNC is still achieving best value.

- 1.31. Following this, the Project team will go out to tender via NNC's Procurement team, utilising the appropriate procurement model such as Competitive Procedure with Negotiation (CPN) to ensure we secure the optimum operating model and best value for the North Northamptonshire HWRC network.
- 1.32. The Project team will work with NNC Property to secure a site for Corby HWRC. This will explore a new lease on the current site, seeking additional land to future-proof growth on the site (if permission/permitting allow), or sourcing another permitted location within close vicinity of Corby for an alternative site.
- 1.33. The award of the HWRC Contract is expected in December 2024.
- 1.34. Following the award of the contract the project team will oversee mobilisation of the new contract leading to the contract commencement on 1st April 2025, as well as overseeing the demobilisation of the old contract.
- 1.35. The Waste Management team will seek to ensure medium- and long-term plans for services and infrastructure improvements at the HWRC network are secured within a HWRC Strategy. The HWRC Strategy will aid in seeking investment through the Council's MTFP budget setting processes for capital and or revenue investment, to ensure the future HWRC service and sites are fit for purpose

7. Implications (including financial implications)

7.1. Resources and Financial

- 1.35.1. The service currently spends £2.693m on the provision of an HWRC service and future service delivery will need to be constrained within the budgets identified within the Medium-Term Financial Plan for the start of the contract period.
- 1.35.2. The current service Budget covers:
 - Corby Site Rent
 - The HWRC Contract, wood waste bonus and handling and haulage.
 - Disposal costs of residual and wood waste from HWRC
 - Recyclate income (guaranteed and variable).
- 1.35.3. Insourced services are anticipated to cost in the region of 5-7% more per annum than outsourced services and so would place an additional unfunded pressure on budgets.
- 1.35.4. The Medium-Term Financial Plan has accounted for RPI inflation of costs and an element of population growth to reflect expected budget increases, these would see the base budget in 2024/25 being £2.848m

- 1.35.5. NNC also need to consider the client team within Waste Management which will lose the shared resource of Waste Contracts Officer currently provided by WNC and should consider this within any service restructure.
- 1.35.6. The Waste Management team are working with NNC Property colleagues to assess availability of suitable NNC assets as well as consider land values, rental options etc to ascertain the likely costs of continued provision of a Corby site. Either at the existing leased location, or an alternative location.
- 1.35.7. Where financial implications are identified beyond the current and forecast budget, they will be picked up and reviewed with the Highways and Waste Finance Business Partners who are on the Procurement Steering Group, and escalated for review, assessment and decisions to proceed via the Executive Members and Officers as per the requested delegation within this paper.

7.2. Legal and Governance

- 7.2.1. The Environmental Protection Act 1990, at section 51, places a duty on Councils to provide to provide Household Waste Recycling facilities.
- 7.2.2. Any procurement exercise for goods, works or services must be conducted in accordance with the Councils governance and legal obligations, specifically in compliance with the Council's Contract Procedure Rules and the Public Contract Regulations 2015 (PCR2015). PCR 2015 requires contracts for supplies and services more than £189,330 to be tendered in accordance with the regulations by way of a tender process.
- 7.2.3. Where legal implications are identified they will be picked up and reviewed with the NNC Legal Business Partner and the Council's appointed Legal Advisors (Anthony Collins Solicitors) who are on the Procurement Steering Group, and escalated for review, assessment and decisions to proceed via the Executive Members and Officers as per the requested delegation within this paper

7.3. Relevant Policies and Plans

- 7.3.1 The operation of HWRCs assist the Council in meeting the priorities in the Corporate Plan around:
- Modern public services
 - Ensuring we are providing efficient, effective and affordable services that benefit the communities across North Northamptonshire.
 - Green, sustainable environment:
 - Ensuring we are encouraging recycling and reuse by providing appropriate access to facilities for our residents, helping to keep our environment free from litter.

7.3.2 The Waste Management 3-Year Plan (2022-25) sets out activities needed within the waste services to allow development of harmonised services for residents of North Northamptonshire.

7.3.3 Activity undertaken in this service area is supported by the following corporate policies and plans:

- Highways & Waste Service Plan (2023-24)
- North Northamptonshire Waste & Recycling Policy
- Street Cleansing Policies
- Litter and Fly tipping strategy
- Enforcement Policy for Waste Crime
- North Northamptonshire Council Carbon Management Plan

7.4. Risk

7.3.4 Loss of recycling processing and disposal facilities has been identified as a key risk for the waste management service and has been included in the service risk register. All the activities contained within the plan are controls to mitigate this risk.

7.3.5 There is a risk that any new contract may be more expensive than the existing arrangements. This can only be determined by carrying out a procurement exercise. Even if it is more expensive than the current arrangements, it will be the most cost-effective option that the Council can achieve through the legally compliant procurement route.

7.3.6 Not undertaking the timely procurement of new HWRC services for 2025 will see NNC have to close these facilities which removes opportunity for community recycling, reuse which could result in:

- Increased Fly tipping – especially of bulky items and non-recyclables
- Increased kerbside collection costs as waste previously taken to HWRC is presented in kerbside recycling resulting in longer round times or incomplete rounds.
- Waste that could be recycled ending up in more expensive kerbside residual waste, with the risk of being landfilled and not being recovered for recycling.

7.3.7 The principal controls within this procurement will be ongoing overview by the Steering Group set up within the service for the Procurement of the Residual Waste Contract which will extend its remit to cover the HWRC procurement. Membership of which consists of:

- Executive Director Place & Economy / Assistant Director Highways and Waste
- Waste Management Officers
- Finance - Highways and Waste Finance Business Partners
- Procurement - Business Services Category Partners
- NNC Legal Service - Contracts/Project Solicitor

7.3.8 The Steering Group will maintain and review a project Risk Register and seek early identification and mitigating actions for issues/risk.

7.5. Consultation

7.5.1. No consultation has been undertaken at this stage as the activities contained within the Report are mandatory due to the requirements under Public Contracts Regulations or as part of the Statutory duties laid out under the Environmental Protection Act 1990

7.5.2. Should there be a need to make changes to HWRC services as a result of submitted tenders and negotiation, we will ensure we undertake consultation in line with NNC policy and guidelines

7.6. Consideration by the Executive

7.6.1. This report is a result of the decision of Management 3-Year Plan 2022-25 approved by Executive in September 2022 requiring an Options Appraisal of HWRC Services in North Northamptonshire.

7.6.2. The members of Sustainable Communities Executive Advisory Panel (EAP) were part of workshops held in development of the Options Appraisal during the Summer 2023. They were advised of the recommendations within the Options Appraisal at an EAP meeting held on 11th October 2023.

7.7. Equality Implications

7.7.1. An Equalities Screening Assessment (ESA) has been completed indicating there is no need at this stage for an Equalities Impact Assessment (EQIA). The ESA is attached at Appendix B.

7.7.2. At this time there is no planned change to the HWRC service other than securing a new operator. However, there are several operational issues that could need to be reviewed within the procurement process, which means there is a need to keep equalities impacts under review. This is to ensure there are no negative impacts on any of the protected groups owing to the outcomes of this report.

7.7.3. The Council is committed to treating people fairly, as such the Procurement Steering Group will maintain a live Equalities Plan to be monitored by the throughout decision making processes linked to the HWRC procurement. If during the procurement there is identified a need to make changes to services which could impact any protected group the Waste Management team, on behalf of the Steering Group, will undertake further ESA or EQIA to identify and mitigate any negative impact of any changes.

7.7.4. Any additional ESA- EQIA will be submitted to the Equalities Team and published in line with NNC policy/guidelines.

7.8. Climate Impact

- 7.8.1. The Council, having declared a climate change emergency in June 2021, is committed to reducing its climate impact both within its own Council buildings and in working with businesses and the wider community to achieve the Council's target to be Carbon Neutral by 2030, and the target of National Net Zero energy emissions 2050.
- 7.8.2. By ensuring the Council has appropriate contracts in place to provide HWRCs it is able to meet its obligations for provision of facilities for disposal of the wide range of waste types accepted at the HWRCs, keeping those material from landfill. Therefore, the Council can continue to promote and encourage the separate collection and appropriate treatment of recyclable, reusable and compostable material. This approach seeks to reduce the environmental impact of waste disposal.
- 7.8.3. By entering into contract arrangements, the Council can monitor the impacts of managing the material to ensure that it is ethically and environmentally managed in accordance with Waste Management legislation and aligns with the Council's strategy in terms of Climate Change.
- 7.8.4. Any new contractual arrangements will include a commitment from new contractors to help NNC meet their carbon reduction targets as well as a commitment to meeting national targets within the Net Zero Carbon agenda.

7.9. Community Impact

- 1.35.8. The HWRC service is highly valued by residents and provides a valuable service for all North Northamptonshire's residents who wish to increase the total amount of material recycled from their households. The HWRC support kerbside recycling by providing additional recycling opportunities.
- 1.35.9. By putting in place a contract, that seeks extraction of all recyclables for the residual waste streams NNC can encourage and promote recycling, which provides all communities with the associated environmental and societal benefits.

7.10. Crime and Disorder Impact

- 7.10.1. By maintaining operation of HWRCs we will be ensuring we have appropriate disposal routes for waste. As such, supporting the tackling illegal waste disposal and associated anti-social activities therefore mitigating crime and disorder offences associated with illegal waste disposal.

8. Background Papers

8.1. There are no background papers to this report