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Department: Neighbourhood Services  
Your ref: SCC/consultation CRC  
Date: 2 January 2019

Dear Cllr Goodman

### **Response to consultation on proposed changes to Surreys Community Recycling Centres**

This letter provides Spelthorne Borough Councils response to the consultation document which is seeking views on proposed changes to Community Recycling Centres (CRC). It covers the following areas:

- Permanently closing a number of smaller and less effective CRCs, whilst increasing the opening hours at some CRCs
- Introducing a charge to dispose of construction wood & felt
- Increasing the cost of disposing of items already charged for
- Charging an annual application fee for van, pickup and trailer permits

A meeting and presentation was held at the Surrey Waste Partnership (SWP) members meeting on 31<sup>st</sup> October. At this meeting representatives from many boroughs commented and expressed different views on the proposals, most of which concerned the impact on their residents of making changes as proposed. It was accepted that Surrey County Council are facing massive financial challenges and need to make savings to support other critical services.

It is fair to say that Surrey County Council are not alone in these financial challenges, most authorities are in the same position and are trying to combat difficult financial situations as a result of reduced funding from central government and greater demand on services.

Many of the Surrey County Council funding reductions, including the recent changes to recycling credit schemes do nothing more than shunt the onus and cost onto district and borough authorities which we have no choice other than to bear. Whilst it is not overtly obvious, these new proposals for the CRCs will impact us financially. The comments below provide detail of our concerns and issues.

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## **Permanently closing a number of smaller. Less effective CRCs, whilst increasing the opening hours at some CRCs**

Whilst we are aware that Shepperton CRC has not been specifically cited for changes we still have genuine and on-going concerns. It was suggested at the SWP members meeting that the proposals would not affect Spelthorne or Shepperton. This is not correct as whilst there are no specific changes listed for the Shepperton site any changes that are proposed for the site in Lyne and possibly Bagshot will have a direct impact on Shepperton and the wider borough. Our main concerns are based on the fact that we share a number of boundaries with Runnymede and the Lyne site is only 7 miles from the Shepperton CRC. These proposed changes would undoubtedly result in more Runnymede residents using the Charlton Lane facility, creating more traffic in Spelthorne. The main areas of concern in relation to this point are:

1. Increased domestic traffic to and from the site
2. Increased domestic traffic congestion entering/leaving and in Charlton Lane
3. Increased commercial lorry movements to and from the site to remove the waste & recycling deposited
4. The potential for an increase in fly tipping from residents outside of the borough
5. Air quality issues in terms of additional traffic, both domestic & commercial
6. Noise concerns as a result of increased traffic, both domestic & commercial
7. Increased risk of accidents due to users not being familiar with the site or its layout and increased crowding / traffic movements.

As part of the consultation process Surrey County Council have a duty to consider points 1-7 above. This consideration needs to be undertaken before making the final decisions on any of the proposals within the consultation on the proposed changes at Surrey CRC sites.

Access to the research which was carried out to come to the conclusions highlighted in options one to three in the consultation document under **2. CRC site closures** should be made publicly available for openness and transparency during the consultation process.

## **Introducing a charge to dispose of construction wood & felt and increasing the cost of disposing of items we already charge for**

The communications plan which led up to the changes being introduced in September 2016 fell far short of clear and concise. The period of time leading up to and after the introduction of charges resulted in a deluge of complaints and confusion from Spelthorne residents to Spelthorne officers. Due to this lack of clarity within the communications, concessions for some were given by Surrey County Council. The main areas for concern in relation to this point are:

1. A clear and precise SCC communication plan needs to be developed to communicate this message about the changes to all users of the facility. Not just Spelthorne residents but also those who may be required to use alternative tipping facilities as a result of the proposals for Lyne & Bagshot
2. Lessons should be learnt from the poor communication plan in 2016 to avoid confusion
3. Charges for additional items will result in additional fly tipping

4. Advice should be provided for residents as to where these types of items can be disposed of at a reasonable cost

As part of the consultation process Surrey County Council have a duty to consider points 1-4 above. This consideration needs to be undertaken before making the final decisions on any of the proposals within the consultation on the proposed changes at Surrey CRC sites.

Given that we and other boroughs within Surrey are an integral part of the proposed changes we consider it vital that we have the opportunity to comment and contribute to the communication plans before they are finalised.

### **Charging an annual application fee for van, pickup and trailer permits**

We accept that those who have access to vans, pickups and trailers generally have greater opportunity to dispose of larger quantities of waste. We are not opposed to a charging scheme for the issue and management of such permits. It should however be recognised that for some this is the only form of transport they have access to. The main areas for concern in relation to this point are:

1. Discrimination against those residents who do not have access to a car for disposal of their waste at the CRC
2. Potential fly tipping directly related to those who do not agree with a charged for permit scheme. This point would also be relevant for those who have no knowledge of the permit scheme. This could be a mixture of new residents, residents from neighbouring boroughs, first time visitors and/or those who have no knowledge of such a scheme
3. Reluctance to sign up to the scheme

As part of the consultation process Surrey County Council have a duty to consider points 1-3 above. This consideration needs to be undertaken before making the final decisions on any of the proposals within the consultation on the proposed changes at Surrey CRC sites.

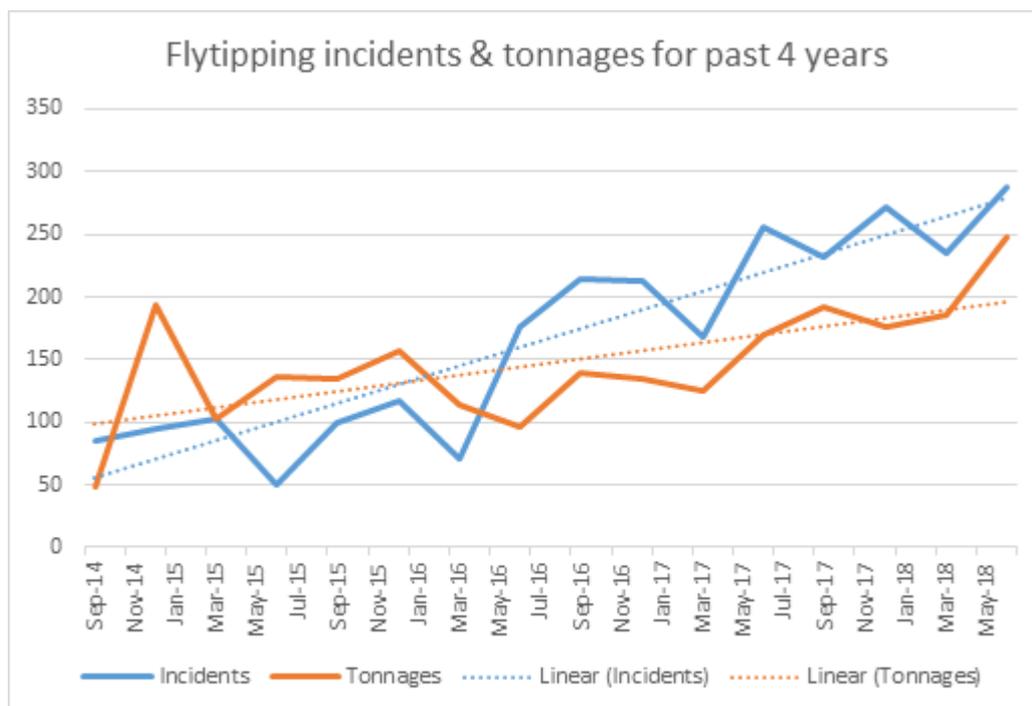
You have not provided an equality impact assessment and we are not able to agree any implications of this revised policy as regards your public sector equality duty. We further note that no equality impact assessment has been published with the consultation document. The report to Cabinet on 30 October states that equalities considerations will be assessed at the end of the consultation process and decided at Cabinet on 29 January 2019. This is inadequate. Firstly a screening of potential equality impacts should have taken place to inform the consultation process so as to be able to consult with the right groups and seek the right information through the consultation process. Secondly, the information gathered on the CRC consultation form will not allow you to assess the impacts of the policy on people with a protected characteristic.

SCC need to develop a plan to deal with the potential for increased fly tipping as a result of the proposals. As a key partner in the fight against fly tipping we should be consulted on the plan which needs to be developed specific to the CRC proposals. We believe the plan needs to focus on how SCC plan to tackle the fly tippers, reduce the opportunity and the

incidents of fly tipping, enforcement, prosecution & education. This plan should include both short, long term and on-going actions.

The CRC charges were introduced by SCC in September 2016. In the period after this, from October 2016 until June 2018, Spelthorne’s fly-tip incidents increased by 134% and the fly-tip tonnage increased by 31% compared to the same period prior to the charges, October 2014 to June 2016.

The graph below shows that in the past 4 years the tonnage and particularly the number of incidents of fly-tipping in Spelthorne have continued to increase. Whilst we accept this is not all relevant to CRC changes there is a clear indication that there has been a steady and marked increase since September 2016 when the charges were introduced.



	Oct 14 - Jun 16	Oct 16 - Jun 18	Increase	%
<b>Incidents</b>	710	1664	954	134%
<b>Tonnage</b>	935	1229	294	31%

Surrey Waste Partnership funded a fly tipping officer post in 2017 and we have jointly run campaigns in relation to fly tipping. However we are of the view that the proposed CRC changes require a different approach by SCC to fly tipping. SWP are still considering the effectiveness of this post before recruiting again as the post is now vacant.

Spelthorne has undertaken and committed to provide resources since early 2015 in the form of a law enforcement team to tackle some of the issues relative to fly tipping (tackle, reduce, enforce, prosecute & educate) at the expense of Spelthorne and to the benefit of Surrey. Even with these dedicated resources, fly tipping continues to be on the increase.

Spelthorne law enforcement officers are already at full capacity in dealing with their existing workload of fly tipping incidents. Under the circumstances we are not prepared to manage

any additional workloads associated with increased fly tipping as a result of the proposed CRC changes. If the proposals do go ahead we expect SCC and not the SWP to provide and fund people and operational resources to deal with these specific fly tipping related issues. These resources would also need to be backed up by teams at Surrey County Council to deal with the legal aspect of enforcement and prosecutions. Both of which are time consuming and expensive.

Spelthorne Borough Council believes that some of the options proposed in the consultation exercise are a practical way forward to addressing the County's financial pressures.

However given the number of issues and concerns raised in this response we do not believe that there is enough clarity, detail or evidence available publicly in respect of the proposals which have been put forward within the consultation exercise on proposed changes to Surreys Community Recycling Centres.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ian Harvey', with a long horizontal flourish underneath.

Cllr Ian Harvey  
Leader Spelthorne Borough Council