



Sunray & Egmont Community Residents Association

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Monday 8th February 2021

Ref: Letter regarding objections to proposed new Fair Use Policy at Villiers HRRC to be discussed at the Culture, Housing, Environment & Planning Committee on 11th February 2021, 7:30pm

Dear Councillors,

Earlier today (Saturday 6th Feb 2021) a member of the Sunray Community posted on our Facebook and WhatsApp groups about their concerns and general disagreement with the proposed changes to the Villiers Road Recycling Centre, and the responses received to those posts have also been negative and question the proposals long-term viability and money saving claims.

As the Sunray & Egmont Community Residents Association we have been asked to highlight these concerns and request that they are raised at the meeting where the proposals will be discussed.

The primary concerns regarding the plans are as follows:

1. The changes are highly likely to increase the risk of fly-tipping within the Sunray & Egmont Estate

We currently have a significant challenge with residents (and people outside the estate) dumping their garden waste, fencing, wood, rubble and general waste around the estate and service roads and will be disproportionately affected by this more than other residents. If people know (or even just think) they will be charged to dispose of their waste at Villiers Road then it is logical to foresee that fly-tipping will increase.

2. It will seriously impede our volunteer's ability to clear fly-tipping from around the estate and service roads due to the additional costs incurred

Over the last year, volunteer residents have cleared three service roads of many years' worth of fly-tipping. This required work over several weekends and resulted in over 40 trips to Villiers Road with cars full each time. The proposed changes would make this financially impossible and crippling for a small residents association such as ours. Keeping the service roads and estate free of rubbish and fly-tipping is central to encouraging a community spirit and ensuring everyone takes pride in where they live.

If we are unable to keep the area clean and tidy due to the proposed financial constraints, we risk returning to the times when Sunray was considered a problem area, encouraging bad behaviours, and reducing the wellbeing, biodiversity, and environmental benefits that we have achieved over the last 18 months.



3. The potential increase in demand on the rangers having to respond to increased fly tips potentially mitigates any additional revenue collected from the charges

Borough wide, the increase in fly-tipping will require additional resources not only to clean up the mess, but also track the perpetrators. I note the agenda and addendums state that marketing/advertising will be undertaken to educate residents and request they don't fly-tip and resources will be put into enforcement; however, fly-tipping is currently a problem even without the proposed changes so the advertising and enforcement currently undertaken is clearly not sufficient, meaning significant extra funds will be needed to mitigate the extra fly-tipping - hence offsetting any perceived gains.

4. There doesn't appear to be a meaningful analysis of the impact of these charges on people with incomes that does not readily enable them to be able to cover the expected costs.

In addition, there are some inconsistencies within the information supplied and some apparent lack of transparency (one could go so far as to say some disingenuous statements are made):

- There is some overlap between annex 2 and annex 3 regarding which items can be taken to the centre and which will be charged for. Annex 2 states that wood and carpets can be taken, but annex 3 states that timber and carpets will be charged - this is confusing / not at all clear and if this is how future messaging is carried out then residents will not be able to determine how to correctly fill in the booking form (increasing delays at the site) or may just decide to fly-tip to avoid any potential charge (or having to waste time arguing the point with the council)
- There is no clarity on what constitutes an 'item' - annex 3 states a 'fence panel' and then also states 'a shed' which is arguably made up of around 5 / 6 or more fence panels! Would a shed be charged the same as a single fence panel? Again, lack of clarity on this will lead to confusion and potentially people will just not bother and go for the 'cheap removal service' AKA rogue fly-tippers!
- Also, annex 3 states the charge will be per item / bag, but people that have smaller cars will need to break down some items into smaller, multiple pieces, will this be charged as a single or many items?
- What is this charging scheme / item definition trying to achieve? Currently it does not feel well thought out and seems to encourage people to use unlicensed waste disposal traders.
- The main document referencing the proposed changes states that around £30,000 will be saved per year, however, it fails to mention how much revenue is expected to be raised by the new charges. Paragraph 17 states that 2,307 tonnes of non-household waste (i.e., proposed chargeable waste) was received in the last year. If we assume the average item/bag of this waste weighed 20 kilos, then gross revenue would be around £400 - £500k (at £5 per bag / item) - even if that is a very conservative weight estimate and we doubled it, that is still around £250k gross revenue. Why is this not mentioned in the documents and why is there no financial analysis document I can look at rather than having to rely on my potentially dodgy maths skills!
- Para 17 also states that the proposed charges are comparable with other councils, but of those listed, 6 councils don't charge residents bringing items by car, 1 doesn't charge for the first 3 bags and the remaining five charges are listed as an amount per 100kg and since the documents provided only list a 'bag or item' there is no way to determine the average weight of a bag or item and therefore no way to



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determine if the charges are indeed comparable - hence this could be viewed as somewhat disingenuous and quite possibly misleading. In addition, none of the councils that RBK are currently working with in the South London Waste Partnership are listed so no meaningful comparison of similar councils can really be undertaken.

- Trade / commercial misuse is stated in the document as one of the reasons for implementing the charges, however, have any options been investigated to mitigate / remove this misuse?

Finally, at present Kingston council can proudly say they are one of the better London boroughs at supporting residents and controlling fly tipping, but, ironically, the proposed charges risk losing that reputation overnight.

As a residents association, we want to work with RBK to ensure residents do the right thing, but we know there will be irate pushback on this by people who will say that they can't afford to pay this in addition to the second council tax increase in 2 years of 5%. We strongly urge the council to reconsider the proposals, clarify the position and ensure that all residents are treated fairly. Perhaps amending to allow for some level of free disposal and supporting local initiatives to encourage additional recycling, repurposing and community sharing of unwanted items.

Many thanks,

Paul Martin,

Chair, SECra

for and on behalf of Sunray & Egmont Community Residents Association.