

LISVANE COMMUNITY COUNCIL

A LITTER AND FLY-TIPPING FREE WALES CONSULTATION

Question 1: Do you agree litter and fly-tipping should be covered under one plan? If not, please provide a reason for your answer	No - it is desirable to incorporate these in a single plan. As the document itself states the reasons for these offences are different and the actions required to address them will be different. There is a danger of losing focus of any steps which are put in place fail. Littering is seen as an anti-social aberration whereas fly-tipping is definitely criminal. An integrated Plan needs to reflect these differences. The issues have largely different causes, but are linked. Littering and domestic fly tipping is mainly a social problem which may be addressed by education, community action and “policing”. The paper states that “annual fly-tipping data obtained from Local Authorities indicates over 70% of incidents involve household waste”. However, this does not define household waste. Does it include waste produced by builders etc. acting for the householder? Bulk fly tipping has mainly commercial roots which may be addressed by legislation, policing and local government policy. Rubbish can also be dangerous to pets & wildlife. Where public money is to be spent, then audit and accounting systems need the granularity to ensure that the money is spent wisely and for the purpose stated. This may not be possible under a single plan. Coordination with local authorities is essential. For example,
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	one of the causes for fly tipping may be the closure of local recycling sites. It is expensive, inefficient and unpopular for residents to drive long distances to recycling centres. Better communications may help to integrate local authorities' services and future actions with the stated aims of this paper.
Question 2: Do you agree with themes we have chosen? Do you think they will help us achieve our ambitions? If no, what other themes do you think need to be included?	Yes but some themes should have greater emphasis than others and consequently increased resources and funding. Prevention is considered as the main theme The themes are sensible. They incorporate elements of a general control system with the necessary feed-back loops. However, the essential ingredient is implementation of change. You change something, you measure its effect, compare it with the identified success criteria and then adjust the changed environment again if necessary and repeat. The model does not specifically identify the changes to be implemented. As a strategy this is fine. However, there should be a reference to lower level plans with agreed specific actions against which the results can be monitored. Another point to bear in mind is that if you change a number of things at the same time, then it is difficult to know what change has caused what effect. It also remains to be seen whether all the stakeholders and the community at large will feel committed partners to it.
Question 3: Do you agree with the suggested actions in the waste reduction theme? If not, please provide reasons.	Yes - these would all be helpful. Charging people to dispose of household waste is counterproductive. Dog fouling litter disposal is a problem and the provision of bins would alleviate the problem. It is noted that in a study of the most commonly found materials in litter bins, by Local Authorities, dog excrement & food came top. Further work needs to be done to ensure this is stopped & prevented from happening. Dog

	owners have a responsibility to act in a responsible manner . The proposed actions are laudable. However, much depends on obtaining sufficient buy-in from industry. The legislation takes a huge amount of time to implement and economic factors and competition pressures are often cited by industry to delay or opt out from compliance. The issue has a global perspective which such initiatives will find difficult to embrace. Refilling schemes are great for drinking water, but what about all the other things which come in single use containers? Drinks, snacks etc. Compostable, reusable and recyclable options are all far better than land-fill or burning. Converting single use items to these options is the easier gain in the short to medium term. Why supermarkets and their suppliers can still get away with “not yet recyclable” is astonishing. Alternatives have been available for years. It’s about time that legislation gets a grip to enforce recyclable/compostable packaging. Waste recycling is a costly exercise which is based largely on the cost/value equation of collection, separation, bundling and sale of materials. However, where the sale value of the waste is lower than the cost of separation and bundling, it goes into land-fill or incineration. How much money needs to be injected into the system to off-set financially unviable recycling? Nowhere in this paper does it indicate how much money is available to inject into the system. The paper identifies some of the costs of littering and fly tipping, but does not say how much of this should be allocated to identifying and implementing solutions. Grants are mentioned, but these are transient, usually local and do not seem to be part of the long term strategy.
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	Local Authorities should use a single GPS system to map all fly tipping incidents. These can then be transferred onto an All Wales base, looking for any similarities etc. This must be a properly funded priority.
Question 4: Do you think other actions should be included under the waste reduction theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.	Yes. Reinstate litter bins. Employ more people to clear litter. The sight of littered streets encourages more littering. Support community groups to assist with clearance. Reduce charges on households wishing to dispose of large household items. Can't see mention of schools here. We need to change people's attitude and school and education of children is where to start. Only the single use plastic bag rules are backed by legislation. None of the other items in the table have any enforcement measures in place. Consultation with industry has been going on for years with little to show for it. It is time that governments take this issue seriously and pass legislation to enforce the changes required, for example, to at least make all packaging recyclable. Without legislation and enforcement, this plan is unlikely to make much difference. Regarding dog fouling: some people actually go to the trouble of picking up the waste and then go to more trouble to leave it in an inappropriate place, e.g. tying it to a tree. There is no national advertising campaign about this which would ideally be coordinated with increased monitoring and penalties; people also complain about a lack of bins, but that might not make any difference to the irresponsible.

Question 5: Do you agree with the suggested actions in the waste evidence, monitoring and evaluation theme? If not, please provide reasons.	Yes. The actions are all about identifying specific details about offences. We know, for the reasons stated in the report that the problem is costly and unacceptable. However, action to address the issues, not just to obtain more and more information is required. The system is a cost item itself, with no direct cost savings. Whilst more information is useful, there may be better ways to spend the money to address the problems at source without employing all the agencies identified. Do we need all these sources of data – can they be usefully refined? Suggest an environment education initiative should run alongside or we run the risk of reporting nil progress.
Question 6: Do you think other actions should be included under the waste evidence, monitoring and evaluation theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.	Yes. We need a better view on the amount and quantity of fly-tipping on private land that is not being reported to the Council. Reporting of fly-tipping on private land results in a cost for the landowner. To ensure landowner engagement there should be some compensation or help with provision of cameras on known fly-tipping blackspots. Local walking groups can also be a source of information from within the community. The power of social media should be harnessed to report fly-tipping and provide evidence. Identification of International best practice is mentioned. Most European countries are far better than we are in protecting their environment from litter. Investigating their philosophy and successful actions should perhaps be given greater prominence and may save us time in identifying applicable strategies. Need more input from the general public – offer

	incentives/rewards for information. Encourage naming offenders. Make littering unacceptable. Better use of media.
Question 7: Do you agree with the suggested actions in the education and behavioural change theme? If not, please provide reasons.	Yes. The actions involve town and community councils and are described as on-going. However, this community council has received little if any material on this theme (apart from this current exercise). Town and community councils work within a limited precept and apart from their role in cascading messages to residents, do not have the resources to take physical actions, apart from those undertaken voluntarily by residents. Our community benefits from initiatives by public spirited individuals in clearing litter, but this is not run by the council. Resources could be made available, outside the precept, to manage such efforts systematically. Being responsible for one's own rubbish, should be a key driver throughout society. This theme is a key priority for lasting change. Perhaps more emphasis on schools/national curriculum regarding clean environment and personal responsibility. This is where fly-tipping diverges as the current emphasis should be on detection and stronger penalties.
Question 8: Do you think other actions should be included under the education and behavioural change theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.	Yes. There also needs to be publicity around the damaging effects of litter on wildlife. Eg fishing tackle, lead shot, plastic straws etc which all impact on our wildlife. This is in addition to the unsightly impact. Behavioural change can also be effected by publicising the penalties incurred by persistent offenders, including dog waste offenders. It is an important message that individuals should grow up with.

	All rubbish should be disposed of in the correct way. It is like any message in society, if done correctly, everyone can benefit.
Question 9: Do you agree with the suggested actions in the effective enforcement theme? If not, please provide reasons.	Yes. By its nature, fly tipping is largely a clandestine activity. However, given the resources, it should be possible to identify more perpetrators than is currently the case. The main problem would appear to be resources. Whilst it may be possible to sort through material to identify where it came from, this is time-consuming and often ineffective where there are no names, addresses or unique features to be identified. These sorts of forensic skills are expensive and often better deployed elsewhere. Identifying perpetrators directly is another option. Where there are sites of serial offending, it can be worth installing new, (or directing existing), CCTV cameras. However, this would probably redirect the offenders elsewhere. On the subject of CCTV, it is usually the case that serious fly tipping involves a vehicle and ANPR can identify vehicles from their registration plates. Where vehicle numbers are supplied by members of the public, ANPR can be used to track the vehicles, even if the vehicle has false plates. Similarly, where incidents have been witnessed, details of the vehicles involved can be traced using CCTV. This will only happen if the Police, or whoever else monitors the systems, have the required resources. It is not unreasonable for this activity to be budgeted and paid for separately. The Police are not mentioned as owners. The paper focuses on local authorities and environment agencies. However, fly tipping is a criminal activity, so should

	not the Police also have a role? If there is to be a serious intension to address the problem, all the means at our disposal should be engaged. Police and Crime Commissioners could perhaps coordinate the roles of the Police and other stake holders. EE6 to EE12 (particularly 6,7,8 and 9) are crucial to reversing the tendency to fly-tip and get away with it. Tougher message of enforcement, detection, prosecution and more stringent penalties. Littering needs detection and penalties but lower priority than public awareness and behavioural change. Behavioural change in society can take a long time to establish, so interim measures may be needed.
Question 10: Do you think other actions should be included under the effective enforcement theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.	Yes as per response to Q9 Encourage public to tell tales – provide freephone numbers, web sites etc. to encourage this. Offer rewards/incentives for prosecutions. Allow anonymity to be protected. If the public were kept informed of the amount of money spent on the various methods of cleaning up the rubbish & fly tipping incidents, on a regular basis, they would make more effort to be responsible for their own rubbish. Especially if comparisons were made on what improvements/benefits etc. could be made within their local area.
Question 11: Do you agree with the suggested actions in the efficient operational delivery theme? If not, please provide reasons.	No. The proposal that community litter picks should separate recyclable waste at source is unrealistic. Much waste is contaminated even if it is recyclable. The rules about what is recyclable are also subject to change.

Question 12: Do you think other actions should be included under the efficient operational delivery theme to achieve the aims of the Plan? If yes, please provide relevant information and evidence.	Yes – there is no mention of waste being incinerated to provide energy. Fly-tipping, whether on private land or not, should be dealt with by the Local Authority at their expense – that’s what Council Tax and Business Rates pay for Access to waste sites. No one should have to travel more than 3 miles to a waste disposal site. This acts as a major deterrent and is a major contributor to pollution. One action that needs to be identified under the delivery theme is that everyone can benefit in some way by taking this subject seriously, and not expecting other people to deal with the problem. It is everyone’s problem.
Question 13: Our Litter & Fly-tipping Prevention Plan includes a number of actions. Which ones do you think should be a priority? Please give reasons.	EBC6, EBC10, EE1, EE6, EE7, EE11, EOD3 Education is the priority for a long term solution to littering. In the short term, the inappropriate disposal of dog waste should be addressed because the problem is two-fold; not just the unsightliness, disease and smell if you tread in it, but leaving the plastic bags in inappropriate places creates more pollution and may have adverse impacts on wildlife. As a community council, we get more complaints about this than other forms of littering. Priority should be given in Waste Reduction but in parallel to Education and Behavioural Change. Clearly reducing the volume of single use items and increasing re-cycling will have the greatest and quickest impact on waste reduction but for the

	longer term we (as a Country) need to change our whole approach to waste and use of scarce resources and its impact on the planet. To approve this plan serves its purpose, but it needs to include a road map and timescale. Otherwise it will become weak over time. Why not have posters that state cleaning up cigarette stubs costs £4 million a year for the UK. tax payer? Or £53 million spent on street cleaning operations in Wales? How much of this is spent, cleaning up inner cities after Saturday night revellers or concert goers? These facts should be made known to the public and weighed up against what the money could be spent on for the benefit of all. In summary: Education (community and individual responsibility for local environment). Effective enforcement—to reverse the current scourge of fly-tipping. Waste reduction/recycling--build on successes NEEDS PROPER FUNDING AND PRIORITY PLANNING
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