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Delegated Decisions by Cabinet Member for Growth & Infrastructure

Wednesday, 31 August 2011 at 2.00 pm County Hall, New Road, Oxford

Items for Decision

The items for decision under individual Cabinet Members' delegated powers are listed overleaf, with indicative timings, and the related reports are attached. Decisions taken will become effective at the end of the working day on 8 September 2011 unless called in by that date for review by the appropriate Scrutiny Committee.

Copies of the reports are circulated (by e-mail) to all members of the County Council.

These proceedings are open to the public

later G. Clark.

Peter G. Clark County Solicitor

August 2011

Contact Officer:

Graham Warrington Tel: (01865) 815321; *E-Mail: graham.warrington@oxfordshire.gov.uk*

Note: Date of next meeting: 5 October 2011

If you have any special requirements (such as a large print version of these papers or special access facilities) please contact the officer named on the front page, but please give as much notice as possible before the meeting.

Items for Decision

1. Declarations of Interest

2. Questions from County Councillors

Any county councillor may, by giving notice to the Proper Officer by 9 am on the working day before the meeting, ask a question on any matter in respect of the Cabinet Member's delegated powers.

The number of questions which may be asked by any councillor at any one meeting is limited to two (or one question with notice and a supplementary question at the meeting) and the time for questions will be limited to 30 minutes in total. As with questions at Council, any questions which remain unanswered at the end of this item will receive a written response.

Questions submitted prior to the agenda being despatched are shown below and will be the subject of a response from the appropriate Cabinet Member or such other councillor or officer as is determined by the Cabinet Member, and shall not be the subject of further debate at this meeting. Questions received after the despatch of the agenda, but before the deadline, will be shown on the Schedule of Addenda circulated at the meeting, together with any written response which is available at that time.

3. Petitions and Public Address

4. Van and Trailer Permit Scheme Review

Forward Plan Ref: 2011/104 *Contact:* Amy Howard, Waste Contracts Officer Tel: (01865) 815349

Report by Deputy Director for Environment & Economy – Growth & Infrastructure (CMDGI4).

CABINET MEMBER -COMMITTEE – 31 AUGUST 2011

VAN AND TRAILER PERMIT SCHEME REVIEW

Report by Deputy Director for Environment & Economy (Growth and Infrastructure)

Introduction

- 1. Oxfordshire County Council (OCC) currently provides eight Household Waste Recycling Centres (HWRCs) in Oxfordshire. These are provided for householders to deposit waste free of charge. They are not for the deposit of trade waste by commercial enterprises.
- 2. The Van and Trailer Permit Scheme was approved by the Cabinet Member for Growth and Infrastructure on 15 July 2010 and introduced on 1 November 2011. The scheme is designed to prevent trade waste from entering the HWRCs whilst not preventing genuine householders from accessing or depositing waste at the HWRCs.
- 3. This report outlines the detail of the project implementation and reviews the policy.

Policy implementation overview

- 4. The scheme was successfully implemented on time and under budget. Up to the end of July 2011 approximately 11,000 permits have been issued. It is estimated 15,000 permits will be issued to Oxfordshire householders in total.
- 5. The scheme provides owners of commercial type vehicles and certain size trailers with a permit for 12 visits. Applicants submit either an electronic or paper form which seeks a declaration from the applicant that they are depositing household waste only.
- 6. Permit holders can reapply for 12 more visits, every 12 months from the date of issue of their original permit.
- 7. Technology has meant that permits will not expire and they no longer have to be reissued every 24 months. This will bring cost savings to OCC in the form of postage and stationary and allow householders who only use the HWRCs occasionally to reapply when their visits have all been used.
- 8. The site operatives have been trained on the scheme and there is continual monitoring of their performance. The operatives have a comprehensive knowledge of the scheme and are using Blackberry devices to record visits.

- 9. The communications plan started in August 2010 and included banners and flyers at the HWRCs, radio adverts and posters in key locations across Oxfordshire. These communications meant OCC had over 5000 applications prior to the commencement of the scheme in November 2010. The communications throughout have been consistent to ensure all aspects of the scheme are fairly applied to all site users.
- 10. Waste Management Group received an increased volume of calls during the introduction period from October 2010 to February 2011. These were covered by an assigned administrator. The calls mainly related to how permits were acquired or the reason for the scheme introduction.
- 11. The call volumes and the number of permit applications peaked in February 2011 following the end of the grace period, which ran from 1 November 2010 to 31 January 2011. There was for a short period of 3 months an increased level of verbal and physical abuse directed at the site operatives. OCC are working to further support the site operatives through training and notification on the OCC stance on abuse. Where possible OCC have contacted those residents who are perpetrators of this abuse and in some circumstances the police have also been contacted.
- 12. There have been six formal complaints in the first nine months of the scheme. The points raised in these complaints are being addressed as part of the policy review. The number of complaints compared to the number of permits issued is very small and this remains the case.

Flytipping

- 13. The main concern expressed during the introduction of the permit scheme was that an increase in flytipping would occur. However, this does not appear to be the case so far.
- 14. Fly Capture data, which is provided by the Waste Collection Authorities (WCA) to the Environment Agency, for November 2010 to March 2011, shows a decrease in the amount of flytipping across the county, when compared to the same time period the year before. There has been a decrease of over 350 flytipping incidents.
- 15. OCC supported an Oxfordshire Waste Partnership anti flytipping campaign during the scheme introduction. We continue to monitor the situation and work closely with the WCA enforcement officers.

Financial costs and savings of scheme implementation

16. The Van and Trailer Permit Scheme cost £36,000 to implement and £21,000 to administer to mid August 2011. The scheme had an initial £100,000 budget for implementation. There will be an additional cost to administer the scheme until 31 October 2011 of £5,000, therefore, there is an under spend of £38,000. The under spend is due to the type of technology adopted.

- 17. The amount of correspondence and staffing time has reduced now that the scheme has settled down; there will be ongoing administration costs of £20,000 per annum.
- 18. All eight of the HWRCs have seen reductions in the amount of waste deposited and lower levels of congestion on the sites.
- 19. The tonnage data from November 2010 to June 2011 shows reductions of approximately 1,600 tonnes of inert waste, 1,100 tonnes of landfill waste and 1,200 tonnes of compostable waste. This equates to savings up to £250,000 per annum.
- 20. The number of vehicles visiting the HWRCs has reduced on average by 14%. This means it is now easier to access HWRCs and the containers, along with less time spent queuing.
- 21. The data analysed has taken into account the WCA service changes for kerbside collections. There is presently no evidence to show a shift of the waste in to householders' bins and, therefore, no additional collection cost to the WCA.

Policy changes

- 22. The scheme was designed to encompass all the site users of HWRCs; it was acknowledged from the outset that the policy would need a review. OCC builtin a review period to take on board comments and suggestions received during the introduction period. This provided an opportunity to address any concerns raised and amend, where appropriate, the policy to reflect other council policies and public concerns.
- 23. There are a number of suggested improvements and changes to the policy provided by members of the public, Waste Management Group officers and other key stakeholders such as Oxfordshire Waste Partnership Operations and Environmental Quality and Cleanliness Group officers and HWRC contractors. Consultation on the review recommendations has not taken place as the amendments impact upon operational aspects of the policy.
- 24. It is hoped that the scheme will move towards a paperless system with further utilisation of the Blackberry devices on the HWRCs. There are synergies that can be developed by incorporating the scheme into a central customer service base; these are being explored by the Waste Management Group and the Customer Service Centre.

Recommendations

25. Annexes 1 to 3 set out suggested changes to the Van and Trailer Permit Scheme and a recommendation for approval, rejection, or further investigation for each idea has been considered.

- 26. There are key areas of the policy that required clarification, e.g. how the policy applies to taxis, trailer bed lengths, use of ramps on site and mini buses.
- 27. The key change recommended relates to the registration of more than one vehicle against a trailer permit. Recommendations for areas of further investigation are use of the sites by non Oxfordshire residents and the onsite issuing of permits.
- 28. Timescales where applicable are noted against each suggestion. The final policy extension document will be agreed through the Cabinet Member for Growth & Infrastructure at a later date.

Financial and staff Implications of the policy changes

- 29. There are no immediate financial implications due to the policy changes or clarifications.
- 30. The recommendation to investigate options further will result in the production of a business case to assess their viability. OCC will also produce a business case for the scheme to become paperless; this could result in cost savings and substantial environmental payback.
- 31. The current staffing arrangements within OCC are deemed sufficient to cover the policy changes or clarifications and it is anticipated the number of calls or queries will be relatively small. A paperless system would reduce the staffing requirements.

Conclusion

32. The Van and Trailer Permit Scheme has been successfully introduced with the scheme costing less to implement than originally budgeted and producing significant savings. The scheme has not caused an increase in fly tipping and the number of complaints has been low. OCC have listened to the site users and are now looking to address some of the suggestions raised through this review process. There is a need to further explore and utilise technology and the OCC Customer Service Centre to the best effect.

RECOMMENDATION

It is **RECOMMENDED** that the Cabinet Member for Growth & Infrastructure:

- (a) approve the detailed amendments to the Van and Trailer Permit Scheme as set out in Annex 1 to this report;
- (b) conducts a second review of the Scheme scheduled for September 2012.

MARTIN TUGWELL Deputy Director for Environment & Economy (Growth and Infrastructure)

Background papers: Van and Trailer Permit Scheme Policy

Contact Officer: Amy Howard, Waste Contracts Officer: 01865 815349 amye.howard@oxfordshire.gov.uk

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VAN AND TRAILER PERMITTING ONE YEAR REVIEW.

POLICY AMENDMENTS TO BE ACCEPTED

I. The permit scheme is made 'paperless' through the issuing of permits electronically, emails are sent to householders and if they wish to print their own permit they can at home.

This option would move the cost of printing to the customer and depend on the supply of an email address. Anyone who applied online would be emailed a permit which they could print out if they so chose. They would no longer be sent a physical paper permit.

The record of visits would be maintained by the site staff recording visits as they currently are with the Blackberry devices. The computer record would become the 'official' record. It is proposed that registration numbers are entered on the Blackberry instead of permit numbers.

An alteration to the ICT system would need to be made around sending an automatic email to the customer each time a visit was used to remind them of how many visits remain. However, this would have to be considered carefully to ensure we were not sending customers unnecessary emails.

Waste Management would need to take into consideration the impact on households with no computer access and some postage and printing of permits would still be required.

The overall aim of moving to a paperless system needs to be considered in the wider context of the OCC customer service aims and the Customer Service Centre. Considerations need to be made over how OCC can better use developed and emerging technologies.

The impact on site operatives and potential for abuse of the system needs to be carefully considered.

A business case will be produced to outline the viability of the scheme becoming paperless.

II. Two towing vehicles named on one permit, still allow 12 visits per household, but increase the number of cars that can be used.

The policy will be altered to allow householders to register two vehicles to each trailer application. The system for registration as it stands will not be altered as the cost of the database alteration set against the small number of requests for the registration of additional vehicles will be small.

The system will operate that the one vehicle registration will be used for the application and it will be for the resident to contact us to discuss adding a second registration number to the permit. This will be done on a bespoke permit design, which will have a note added for additional vehicle registration numbers. If the scheme goes paperless then the ICT systems need to reflect the fact that two cars registered at the same address are able to tow a trailer.

The rules on towing with a commercial type vehicle are unaffected by this change.

The purpose of this alteration is to account for households with one or more vehicles that can tow the same trailer.

III. State the length of trailers in metric and imperial.

The trailer bed length was always advertised in metric measurements of 1.8 metres and 3 metres; the conversion used by householders who work in imperial measurements has led to confusion of the exact conversation figure.

For clarification and ease of use the policy stands as:

Length of trailer bed	Permit required?
1.8 metres or less	No
6 feet or less	No
1.8 metres to 3 metres	Yes
6 feet to 10 feet	Yes
Over 3 metres	Not allowed onto HWRC sites
Over 10 feet	Not allowed onto HWRC sites

IV. Procedure for Taxis

Taxis (private hire/hackney carriage/London style black cabs) are licensed and insured to carry goods and passengers. This can include taking a person and a suitcase to a friends house, or just a suitcase on its own. Both are acceptable under taxi licensing laws.

For the purposes of van permitting, we consider them to be vehicles designed primarily to carry people rather than goods and therefore they do not need a permit.

Waste legislation states that as a waste producer (in this case a householder) you need to pass your goods to a suitably licensed carrier, or take it to a permitted site.

Therefore, when householders have waste to take to site they are classed as waste producers and can hire a taxi to take them and their waste to a HWRC. The waste producer then passes the waste to a suitable permitted facility (the HWRC). This is allowable under waste and taxi legislation.

Waste producers (in this case the householder) cannot pass waste to a taxi driver to take to any site (including HWRCs) without going with the waste themselves. The

taxi is not a licensed waste carrier and therefore cannot legitimately be passed the waste by the householder.

For clarity OCC's policy is therefore:

- Taxis are able to access HWRCs, as long as they have the person who produced the waste (the householder who is paying the fare) in the vehicle with them. If they do not have the waste producer with them, they will be turned away.
- If the taxi has waste from their own house, (and therefore the taxi driver is the one who has produced the waste, and they are not carrying a passenger) then they will need to complete a Trade Waste Disclaimer on each visit.
- Larger taxis that have been adapted for disabled use are still designed to carry people rather than goods. They do not need an exemption letter to enter site, but need to follow the above guidelines depending on if they have the waste producer with them.

V. Procedure for Ministry of Defence (MOD) bases and property.

Householders living on a MOD basis or property are required to acquire a permit if they own a commercial type vehicle and wish to visit the HWRCs.

However, where the MOD personnel have access to communal commercial type vehicles on the MOD base, Waste Management will issue the vehicle with a permit, and they will be requested to ensure the permit stays with the vehicle for each driver to use. Additional permits will be granted as required.

In circumstances such as soldiers being sent away on short notice, OCC would accommodate this as far as possible and authorise time limited access to a HWRC.

The waste from the actual MOD buildings and sites is not accepted at the HWRCs. OCC have a Commercial Waste Reduction Officer who is available to provide further information to the MOD on correct and proper waste disposal.

OCC will work through the MOD liaison officer to ensure bases are aware of the scheme in advance and the policy for acquiring permits.

VI. Clarification on the admittance of mini buses to the HWRCs

Mini buses over 3.5 tonnes or with more than 11 seats are not allowed on to the HWRCS. Mini buses with 11 seats or less require a permit, regardless of size.

A people carrier is not classified as a mini bus. OCC maintains a list of people carrier makes and models.

Mini buses are not allowed to tow trailers onto the HWRC sites.

VII. Householders who don't have, or choose not to use their kerbside collection provided by the Waste Collection Authority (WCA)

Householders would need to provide details of their opt-out from the kerbside services. OCC would contact the relevant WCA for confirmation. OCC upon receipt of satisfactory evidence would provide the equivalent number of visits to the householder, as they would have received kerbside collections, which for all areas would be once a fortnight or 26 visits.

Householders would still be required to complete a permit application and to declare it is only household waste. OCC would reserve the right to revoke the permit if it was proven that commercial waste was being deposited.

VIII. Are tractors and quad bikes allowed onto site? Do they need a permit? Are they allowed to tow trailers?

Any vehicle under 3.5 tonnes laden weight can enter the HWRCs, however, there is a secondary operational consideration, as to how vehicles can safely navigate the HWRC.

Tractors in themselves can not carry much waste and the assumption is made that they would need to tow a trailer. Tractors are commercial vehicles and therefore they would not be able to tow a trailer onto the site.

The size of tractors is prohibitive to allow safe movement and parking on the HWRCs, especially on smaller sites, therefore, tractors are not permitted onto the HWRCs in Oxfordshire. OCC would consider in cases where the tractor is exceptionally small to make a concession and it would remain the responsibility of the householder to contact us in advance, but no towing with a tractor would be permitted.

Quad bikes are allowed onto the HWRC, they can tow (within in the 3m bed length limit) and do not require a permit.

VAN AND TRAILER PERMITTING ONE YEAR REVIEW.

POLICY AMENDMENTS TO BE INVESTIGATION WITHIN 12 MONTHS OF THIS REPORT.

I. Would it be possible to let residents who live over the Oxfordshire border to use the sites or pay for entering?

Residents who live outside of Oxfordshire pay their council tax to their local authority and therefore do not contribute to the services run by OCC.

OCC works in partnership with neighbouring authorities in other areas. Now the scheme has been in operation for a year we have the opportunity to explore this possibility further.

Payment for depositing waste onsite would still remain problematic due to cash handling and the potential to increase abuse, not all residents will be aware of the charge or be willing to pay it. It would mean that traders could also enter the site and pay.

If a system is to be set up it would need to be prepaid either by the resident directly or through the relevant local authority. Residents from other Counties would have to apply for a permit and declare it as household waste only.

OCC will look at options which allow the deposit of recycling and compostable waste only. This will benefit rather than cost the council tax payer of Oxfordshire.

There would also need to be a consideration around whether or not OCC can legally charge for the acceptance of household waste.

II. Allow permits to be issued locally by site staff

The issuing of permits locally (ie at the HWRC) is not possible at this time. However, in the future it may be possible as the technology develops to accommodate this, the proposal would involve significant investments in the HWRC infrastructure.

This idea will be added onto a longer term plan for investigation and Waste Management will look to make links with other teams such as the Parking Shop who in some cases are using more advanced technology.

A business case will be produced to ensure the proposal is viable long term.

III. Permits are issued electronically as a download to an application on Smart Phones (or equivalent).

The principal here is the same as the proposal to allow local applications for permits. The infrastructure at the sites is not currently available but will be investigated. The

technology is still being fully developed and was not available at the time of scheme implementation. There is potential to save money in the long term on postage and stationary costs, however, the development of such a system could involve a significant outlay.

VAN AND TRAILER PERMITTING ONE YEAR REVIEW.

POLICY AMENDMENTS TO BE REJECTED.

I. Allow trailers to be pulled by commercial type vehicles (if the boot and trailer are full, it's considered to be two visits/loads, if waste is just in the trailer, its just one visit) and possibly have an overall length to stop long vans pulling 3m trailers

The policy currently does not allow trailers to be pulled by commercial type vehicles. The difficulty of changing this rule would mean a vehicle would always fall outside of the policy rules.

There are two separate issues, firstly the towing of trailers by commercial type vehicles was banned to reduce the amount of non household waste from entering the site, secondly from an operational aspect, as it is unsafe to have large vehicles towing trailers onto the HWRCs.

There have been a relatively small number of householders wishing to tow with commercial type vehicles and low numbers of complaints.

The scheme is designed to prevent commercial waste from entering the site and it was determined during the initial policy development that the capacity of a small van is sufficient when compared to the 1 tonne of waste produced on average per household.

The table below shows the quantity of waste which could be deposited using 12 permit visits if the maximum load weight is utilised. The additional capacity should not be required by householders, through the pulling of trailers.

Vehicle/trailer type	Minimum pay load weigh	Maximum load weight	Number of visits per annum	Estimated weight possible against number of visits per annum
Transit type van – smallest and the largest van in the Transit range	0.930 tonnes	1.737 tonnes	12	11.16 to 20.84 tonnes
Trailer – internal bed length 1.98 metres.	n/a	0.344 tonnes	12	4.128 tonnes
Trailer - internal bed length 2.21 metres	n/a	0.557tonnes	12	6.64 tonnes

If an overall length was to be used (i.e. small van plus trailer), it would involve each commercial type vehicle pulling a trailer to be measured on site, this would be

impractical, would increase the demands on the site operatives and would lead to more incidents of dispute on site. There would also be difficulties in defining an overall length as there is such variety in the models and sizes of commercial type vehicles that are manufactured and can tow.

A change in policy to this effect would be difficult to implement and monitor.

The HWRCs need to remain safe and operational; the pulling of trailers by commercial type vehicles would cause issues on the sites as there is simply not the room on some of the sites to accommodate these vehicles and trailers. We acknowledge that some estate cars are long with the attached trailer, but the small numbers who choose to tow are currently manageable on site and are less bulky.

OCC will continue to monitor how many vans and trailer permits are issued and how many requests we get for commercial vehicles wishing to tow trailers.

II. Borrowed vehicles/waste being taken by friends and neighbours, at the moment this uses up the vehicle owners visits, can vehicles be registered to more than one household, but each household is only allowed 12 visits?

The principal behind the scheme was to prevent trade waste from entering the site. Allowing permits to be issued to multiple addresses could open the scheme up to abuse and allow site users multiple, additional visits.

The number of cases where it has been highlighted as an issue to Waste Management is small. In each case the householder has been given a letter, which is time limited and the number of visits specified, depending on the type of waste being taken. This has been satisfactory to all parties involved.

These cases usually arise in a situation where there is a matter of urgency, such as a house move. In the cases highlighted the householder has accepted that in future there will be a need to plan ahead and discuss with Waste Management about their options.

We have also discovered incidences where householders have changed vehicle registrations and or addresses by a digit or name. This has come to light quickly as the change in details has meant the second permit has not arrived, and in one case it was identified that commercial waste was being deposited. This provides evidence that abuse of the system can occur and that it would not only be utilised by those with a genuine need to borrow a vehicle to deposit waste, but by those wishing to acquire multiple permits.

The scheme would also be less able to 'self' police and it would require closer scrutiny by officers both onsite and within OCC. This could cause the knock on effect of numerous trade waste disclaimers being submitted and a reliance on the WCA to enforce against them.

It is recommended that the registration of a vehicle remains to one household only and that we continue with the system of providing time and visit limited permits

where a need is required. OCC will keep records of those households' issued with time limited permits. Generally householders have been willing to lend the vehicle and their permit to neighbours or family members where applicable and these are isolated occurrences.

OCC to continue with the current system of bespoke permits as and when cases arise.

III. Pay to deposit without a permit and then refund later upon receipt of a permit application.

This idea is linked to our ability to issue permits on the HWRCs and we will further investigate that option (see proposal II in Appendix Two).

The provision of accurate information from the householder would be required and householders do attend site without money.

This proposal would add a large administration burden to the scheme. At present the demand is such that the small number site users who attend HWRCs without a permit request that they can apply on site for a permit rather than pay and then be refunded. This idea would not need to be administered if sites could issue permits locally.

There would be additional costs associated with card transactions and refunding monies. There would need to be a non refundable administration fee to cover the cost of the refund and administration time for OCC. There could also be disputes over payments and this would add an additional and disproportionate time and work load to the site operatives. This would take them away from their main duties on site.

IV. The room available in estate cars compared to the space available in small vans or pick ups. Why should small vans and pick ups be limited to 12 visits when estate cars can have more room? Small vans and pick ups should be excluded from the permit scheme.

The permit scheme was designed around the definition of a commercial type vehicle.

"Commercial vehicles are defined as those that are designed to carry goods, not people. They have no rear windows and/or no rear seats, and/or an open back, or a back, which is separate to the main cab area."

Commercial waste is more likely to be brought to the HWRCs in commercial type vehicles. There is no set definition of a small van, with many makes and models on the market, it would mean a very difficult system to monitor and there would always be a type of van that fell just short the criteria.

OCC recognise that some estate cars do have large boots, but for reasons stated above small vans or pick ups can not be excluded from the scheme.

V. Allow entry for householders with only one item in the commercial type vehicle or trailer to deposit without a permit i.e. they have not heard of the scheme or have forgotten their permit.

This proposal will be applied with common sense on a case by case basis, all site operatives would be aware they should call through to the Service Development Officer or Waste Contracts Officer in this instance. We will take details from the person over the phone and match this record with a future permit application to allocate a visit.

The scheme has become widely known and the number of visits to HWRCs with out permits now has significantly decreased.

Records of vehicles which have been allowed to deposit in these circumstances will be maintained in case a site user is attempting to abuse the system.

VI. Householders towing trailers between 1.8m and 3m, who do not have a permit, can they unhitch their trailers outside site and load the waste into the car and then drive into the HWRC to deposit the waste?

The permit scheme has been in place for 9 months and the scheme is widely known. This is an impractical measure that the site operators and OCC will not encourage householders to take part in. If a householder chooses to do so it is at their own risk. Most residents accept the reason for the scheme and are willing to wait for a permit to arrive, in the cases of extreme urgency OCC have taken a sensible and pragmatic approach to the situation.

The principals of proposal V will be applied in this situation when deemed appropriate for a resident with a single item in their trailer. However, it is unfair on those residents who have acquired a permit to allow access to trailers full of waste.

VII. Every householder should be given one 'free' visit to the HWRC.

The ability to provide every resident with a 'free' visit would open the scheme to abuse; the scheme has been well advertised. Where reoccurring issues occur, we are targeting information in the area, i.e. through District Council Magazines.

There was a grace period in place during which we recorded details of those vehicles who attended site without a permit. We received during this time comments that the grace period was unfair on those who had and were using a permit.

Site users were recorded using multiple sites to gain more 'grace' period visits. The reconciliation between visits and a received application is a time consuming process, which is ineffective at deterring abuse of the system. It requires Waste Management

to contact residents who have had more than one visit to state that they will have visits removed from their permit. This will lead to more abuse and dispute between site operatives, Waste Management and the public.

The database and Blackberry system is not currently set up to record visits by vehicles without permits; therefore, it could not be monitored at site. The ability to undertake this would require a separate upgrade to the database and could be expensive to implement.

To introduce this would go against the fundamental principal of the scheme – that 'commercial type vehicle and certain size trailers require a permit to access the HWRCS.'

VIII. Allow the use of horsebox ramps and trailer ramps / gates on the HWRCs.

This comment generally falls outside of the van and trailer permit scheme as it is an operational matter brought to our attention due to concerns over safety.

The use of ramps on site is not permitted due to the potential for creating a trip hazard. The overall length of some vehicles, trailer and then ramp means one of two things normally occurs. Firstly, the ramp/gate protrudes into marked footways and causes a trip hazard, or the vehicle is required to park across several bays or into the traffic lane, this leads to a build up of traffic at busy times and delays on site.

Anecdotal evidence observed by Waste Management Group Officers shows that often other site users become impatient by the delays and attempt to drive around and/ or park across the vehicle pulling the trailer. This is so they can start unloading meaning the traffic lane is blocked by two vehicles with no means for anyone else to move around the site. This can also lead to the need to unhitch trailers to accommodate them on the site; it often requires staff operatives then to push the trailers and direct traffic around the trailers/ vehicles whilst this happens.

OCC have a duty to ensure the safe operation of the site for all users and act reasonably to prevent accidents happening where issues are highlighted.

For clarity these trailers can be taken to HWRC sites, but the ramps/ gates must remain up. Householders are able to empty trailers from the side and/or take waste out of the top of the vehicle.

Site operatives are instructed to operate this policy with common sense, i.e. a sofa in a horse box can not be taken out the side. The operative can act as a banksman in this case. This is not an acceptable everyday practice as it takes the site operative away from everyday duties.

OCC will encourage the users of horseboxes to visit the sites at quieter times, to minimise the disruption to the site and other users.

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