

VAN AND TRAILER PERMITTING ONE YEAR REVIEW.

POLICY AMENDMENTS TO BE REJECTED.

- 1. 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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