

**HOUSEHOLD WASTE RECYCLING CENTRES - REVIEW OF ARRANGEMENTS
FOR ACCESS BY CERTAIN COMMERCIAL-TYPE VEHICLES**
WDA/20/21

Recommendation

1. That Members approve the ending of the paper-based Permit Scheme for control of access by certain commercial-type vehicles (such as vans and large trailers) to Merseyside's household waste recycling centre network, and to approve the replacement of that scheme with the HWRC Booking Scheme as has been operated during the pandemic.
2. That authority for the implementation of the approved approach be delegated to the Chief Executive in consultation with the Authority Chairperson.

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**HOUSEHOLD WASTE RECYCLING CENTRES - REVIEW OF ARRANGEMENTS
FOR ACCESS BY COMMERCIAL-TYPE VEHICLES
WDA/20/21**

Report of the Chief Executive

1. Purpose of the Report

- 1.1 This report asks Members to consider the current status of access controls for commercial-type vehicles (such as vans and large trailers) at household waste recycling centres (HWRCs) and seeks Members' approval to end the original paper-based Permit Scheme to be replaced with an HWRC Booking Scheme as has been operated during the course of the pandemic.

2. Background

- 2.1 MRWA has a statutory duty to provide places (HWRCs) for residents of Merseyside to deposit their household waste, free of charge to persons resident in the area. There is no statutory obligation for MRWA to accept non-household, trade waste at the HWRCs and MRWA is not funded to do so.
- 2.2 In April 2010 (Authority report WDA/09/10), Members approved the implementation of a Commercial Vehicle Permit Scheme, a scheme aimed at preventing disposal of commercial (trade) waste at HWRCs by placing certain controls on access to HWRCs by householders wishing to use vans and large trailers (i.e. vehicles designed primarily for commercial purposes such as moving goods and that are most commonly associated with traders).
- 2.3 The original Permit Scheme (which is currently suspended) operated under the following rules:
- i) Cars, with or without a small trailer (the trailer being up to 2.0m in length) are allowed access to an HWRC without a Permit.
 - ii) Residents wishing to deliver their household waste to one of the HWRCs in a 'van' or with a trailer between 2.0m and 3.0m in length require a Permit to access a site.
 - iii) Vehicles above 3.5 tonnes gross weight or trailers longer than 3.0m external box length are not accepted at the HWRCs.

2.4 Two types of Permit are available under the original Permit Scheme:

Temporary Permit for general waste – limited to 12 visits per year

Annual Permit for recyclable waste – allowed unlimited visits to a nominated HWRC each year with recyclable waste only (such as garden waste, newspapers & magazines, glass bottles etc.)

2.5 Prior to the pandemic restrictions, residents could apply for a Permit either online or by telephoning MRWA. The paper Permit was then posted to the applicant, lasted for up to 12 months, and was required to access a Merseyside HWRC. The operating contractor Veolia would refuse entry by any defined vehicle (van or large trailer) arriving without a Permit.

2.6 On 24th March 2020, all Merseyside's HWRCs were closed in response to the national lockdown and instruction for people to 'stay at home' (except for one of four defined reasons). When the majority of the network re-opened in May 2020, it did so under strictly controlled conditions; the Permit Scheme was suspended and commercial-type vehicles that under normal circumstances required a Permit were initially denied access to the HWRCs due to very high demand for the HWRC network with long queues at all facilities, and the need to carefully manage access. The reason underlying that decision was that vans and large trailers are able to deliver larger volumes of waste and may typically take longer to unload than a car, which would have displaced a number of cars from accessing the sites at that time.

2.7 When vans and large trailers were subsequently allowed to access the HWRCs again, demand across the network remained very high so an electronic booking system that better controlled access to HWRCs was developed by the Authority. The system capped the number of vans or large trailers that could be booked onto any given site, on any given day. It also removed the need for close contact at the HWRC entrance and for MRWA staff to attend the office to administer paper Permit applications. Van bookings were (and continue to be) sent by MRWA to Veolia on a daily basis, and HWRC reception staff check each vehicle booking by simple visual reference to the registration.

2.8 This approach was initially intended to be a temporary arrangement to enable householders with vans access during the pandemic and was implemented through the Waste Management and Recycling Contract by way of a formal contract variation. The system has worked well during the

course of the pandemic. A limited number of slots are allocated for vans and large trailers per site per day, and the consistent experience has shown that there are routinely more booking slots available than booked each day providing good insight into usage of the HWRCs by such vehicles.

- 2.9 With the cessation of national social distancing controls (and likewise, the access controls at the HWRCs), it is timely to now review the approach.

3. Proposal

- 3.1 It is proposed that MRWA now formally end the old paper-based Permit Scheme for the management of commercial-type vehicle access to HWRCs, and to replace it with the current HWRC Booking Scheme.

- 3.2 The access policy arrangements are proposed to be:

- i) Vehicles which will be required to make a booking to access an HWRC will be defined as follows:

– any vehicle over 3.5 tonnes gross weight, or any trailer exceeding 3.0m external box dimensions will not be allowed to access the HWRCs

- cars or cars with a small trailer (defined as less than 2.0m external box dimensions) will not be required to book into an HWRC and no specific annual limits will be placed on site visits

- ‘vans’ and any trailer that is 2.0m to a maximum 3.0m in external box length will be required to book a visit to deposit household waste at any Merseyside HWRC

Note: a ‘van’ for the purposes of this approach will be defined as one designed primarily for commercial purposes, notably for the carriage of goods, described as follows:

- Any vehicle without rear-side/rear windows
- Any single cab ‘pickup’/‘flatback’ vehicle
- Estate/hatchback/4x4/cars with rear seats removed
- Estate/hatchback/4x4/cars with blanked out rear-side/rear windows (not tinted)

Pictorial images (as supplied with the Permit Scheme User’s Guide) will be used to assist with public and site staff understanding and interpretation of the definition.

- ii) bookings can be made for a specific HWRC on a specific day, and must be made in advance either via the MRWA website or by phoning MRWA;

Note: the default mechanism will be for a Merseyside resident to make a booking via the MRWA website, as this will reduce administrative burden on the Business Services team. Telephone bookings can be made, but callers will be directed to the website for future bookings where they are able.

- iii) an individual household on Merseyside (i.e. a specific address) will be limited to 12 visits per rolling calendar year for delivery of any type of waste in a 'van' or large trailer. No limits are proposed to be placed on cars or small trailers at this time and it is not proposed to allow unlimited visits for vans or large trailers with recyclable waste.
- iv) although a limited number of booking slots were allocated per day during the pandemic, these were almost never filled on any given day so it is not proposed to continue with limited daily slots for the purposes of the new approach to the HWRC Booking systems.

3.3 Whilst most national covid restrictions have been lifted, covid infections continue to rise and future restrictions cannot be entirely ruled out (some of which may impact HWRC operations). Given this and the proposed change to access arrangements, it is proposed that the outcome of the new HWRC Booking system be reviewed after one year to consider the number and nature of any complaints or compliments received from residents, actual numbers of visits being booked per household along with other relevant data etc. It is proposed a report be brought back to Members at that time to consider any further amendments that may be necessary or beneficial to improve the system.

4. Options

4.1 The primary purpose for implementing van access controls at HWRCs is to prevent the deposit of non-household (i.e. commercial) waste. There are a wide-range of possible options for how commercial waste may be managed to prevent deposit at Merseyside's HWRCs however, the most pragmatic, operationally effective and least cost approaches would be as follows:

Option 1: *Terminate the paper-based Permit Scheme and permanently replace it with HWRC Booking Scheme.*

The current HWRC Booking Scheme system is a simple, bespoke system developed on existing systems operated by MRWA.

- Pros:
1. Residents have been using the system successfully since it was put in place during 2020.
 2. It aligns with the modern approach to accessing many public and other services i.e. being electronic, web-based, thereby reducing the use of paper resources (i.e. the Permits and envelopes).
 3. It allows swift access for a resident with a van/large trailer (an electronic booking can be made the day before required access), whereas the paper Permit would need posting for new requests (taking up to 3 days to arrive).
 4. It reduces the administrative burden on MRWA Business Support, and reduces the costs associated with a paper-based Permit approach.
 5. Having electronic information relating to individual visits allows for simple and effective analysis of vehicle access data.
 6. There will be ongoing annual savings of approximately £36,500 per annum versus the paper-based Permit Scheme.

- Cons:
1. Householders are required to make a booking on each occasion they require access (as opposed to once for a paper Permit).
 2. Some residents may have taken the opportunity to make 'unlimited' visits for the deposit of recyclable materials (although accurate data on actual visits is not available).

Option 2: *Return to the original paper-based Permit Scheme and end the use of the HWRC Booking Scheme system.*

- Pros:
1. With the Scheme having been in place since 2010, and apart from during the course of the pandemic, many residents will be used to paper Permits.
 2. Once a household has a paper Permit (Annual or Temporary), they do not need to make an individual booking to access an HWRC.

3. The Permit Scheme allows householders 'unlimited' annual visits with an Annual Permit for delivery of recyclable materials.

- Cons:
1. A transition period would be required to reintroduce the paper-based Permits i.e. with communications to the public, allocation of MRWA staff resources (including more personnel required in the office whilst the pandemic remains ongoing) and for Veolia's HWRC staff.
 2. Use of paper-based approaches (as opposed to electronic, web-based) may be considered antiquated and less environmentally-friendly (due to use of paper Permits, envelopes and postage).
 3. Costs for Permits/printing/postage/additional staffing will be incurred, amounting to approximately £36,500 per annum.
 4. Veolia staff would be required to have closer contact with visitors in vans for checking/handling of paper Permits – and may (in the short-term) resist such an approach.
 5. Unlimited visits for vans and large trailers with recyclable materials potentially invites abuse of the scheme by commercial operators and could be considered potentially excessive for most normal household needs.

Option 3: *Continue with the HWRC Booking system, but under the original access policy arrangements.*

Such an approach would limit deliveries of residual waste in vans/large trailers to 12 per rolling calendar year but would allow unlimited bookings for 'recyclable' materials. Cars would continue with unlimited visits.

Other alternatives could be considered, including:

- Placing a reasonable annual limit on visits by cars;
- Not allowing an unlimited number of visits for recyclable wastes but increasing the limit for all waste deliveries in vans/large trailers
- Controlling the number of visits that could be made by vans/large trailers to one per month (as opposed to annual).

The precise pros and cons of all alternatives will be dependent upon the actual policy ultimately adopted.

- Pros:
1. The original approach maintains the same access policy arrangements as under the original Permit Scheme.
 2. Some householders may wish to take advantage of unlimited access in vans for delivery of recyclable materials (such as glass, paper, card or garden waste).
- Cons:
1. This is not something that could be managed through the current booking system. Any alternative arrangement to that currently undertaken may require the development (and potentially external procurement) of a new booking system, the timescales and costs of which are currently unknown.
 2. There is increased operational complexity for site staff in checking individual vehicle bookings and the nature of the waste being disposed of, which can result in challenge at the site reception.
 3. Having two separate waste booking streams on the web form could result in confusion for householders (e.g. if disposing of both recyclable and non-recyclable waste at the same time).
 4. Allowing unlimited bookings for vans and large trailers with recyclable materials potentially invites abuse of the scheme by commercial operators and could be considered potentially excessive for most normal household needs.

- 4.2 Given the impacts (both operational and financial) of uncontrolled access to the Merseyside HWRC network by operators delivering commercial waste, it is not considered to be a viable option to end all commercial-type vehicle management arrangements and to cease the access controls at the HWRCs. Given this, removing any form of controls (paper Permits or HWRC Booking) is not proposed here.

5. Further considerations

- 5.1 Veolia manage and operate the HWRCs under a contract (the Waste Management & Recycling Contract, WMRC) with MRWA. The contract requires Veolia to prevent access by traders but also to implement MRWA's Permit Scheme for the control of commercial-type vehicles. A temporary contract variation was made to enable the suspension of the Permit Scheme and implementation of the HWRC Booking system. Should this arrangement be continued, a further contract variation to the WMRC will be required with Veolia.

5.2 Whilst commercial-type vehicle control arrangements are very common at household waste centres nationally, there is no consistent standard policy or approach undertaken with a variety of approaches to limits on numbers of visits, types of vehicles controlled and nature of access (e.g. by permit or booking). Such controls are therefore entirely a matter for local decision.

5.3 The original Permit Scheme was occasionally viewed by some commercial operators as just that – a permit to dispose of their waste at the HWRCs (despite all the relevant communications being clear the sites are for household waste only). Any vehicle control arrangements at HWRCs remain a deterrent only and can be challenging to administer and police.

6. Risk Implications

6.1 The following risk analysis had been undertaken in relation to this report:

Identified Risk	Likelihood Rating	Consequence Rating	Risk Value	Mitigation
Risk of uncontrolled access by commercial operators – resulting in additional waste, cost and operational impacts	5	4	20	<ol style="list-style-type: none"> Put in place an access control scheme for commercial-type vehicles. Existing contractual controls (Veolia obligations) with checks at site gate
Risk of criticism that commercial-type vehicle controls are discriminatory	2	2	4	<ol style="list-style-type: none"> Legal advice confirming acceptability of reasonable controls Permit/booking scheme allows reasonable access, even where limited
Risk of contractor challenge to ongoing/permanent implementation (by contract variation) of booking system	2	2	4	<ol style="list-style-type: none"> Evidence of success of scheme over last year Early discussion to be held with contractor around ongoing/permanent implementation

7. HR Implications

- 7.1 The commercial-type vehicle HWRC access scheme (either paper-based Permit or HWRC Bookings Scheme) are administered by MRWA's Business Services team. Resources for the HWRC Booking Scheme will be from existing team staff and allocated as at present. Additional resourcing will be allocated for the administration of the paper-based Permit Scheme.

8. Legal Implications

- 8.1 MRWA has a statutory duty to provide places (HWRCs) for residents of Merseyside to deposit their household waste, free of charge to persons resident in the area. There is no statutory obligation for MRWA to accept non-household, trade waste at the HWRCs.
- 8.2 MRWA is legally entitled to prevent access to its HWRCs by traders for deposit of non-household waste. MRWA is also entitled to put in place reasonable controls over access to its facilities by householders for deposit of household waste in any vehicle, including commercial-type vehicles such as vans and large trailers.

9. Environmental Implications

- 9.1 There are no environmental implications associated with this report.

10. Financial Implications

- 10.1 Having no form of controls over trade waste could reasonably be expected to result in an increase in such waste being delivered into the HWRC network along with the associated costs and impact on operations, the quantum of which cannot be accurately defined. MRWA is not funded to receive and manage commercial waste.
- 10.2 There is an administration cost for the paper-based Permit Scheme, arising from the purchase of the Permits themselves, printing of Permits, postage to householders and additional staffing demands. These costs amount to approximately £36,500 per annum and ending the Permit Scheme to be replaced with the HWRC Booking system would result in an equivalent annual saving.

11. Conclusion

- 11.1 Controls over access to Merseyside's HWRC network for certain commercial-type vehicles have historically been in place in an attempt to

prevent deposit of trade waste. A paper-based Permit Scheme has been in place since 2010 but was temporarily replaced during the course of the covid pandemic by an HWRC Booking system which did not require the use of paper Permits.

- 11.2 The majority of covid controls have now been removed from the HWRCs. This paper is intended as a formal review of current arrangements and seeks Member approval to end the historic paper-based Permit Scheme and to replace it with the HWRC Booking Scheme.
- 11.3 Subject to Member approval of the recommendation, authority to implement the recommendation (which will require public communications and a contract variation) is requested to be delegated to the Chief Executive in consultation with the Authority Chairperson.

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The background documents to this report are open to inspection in accordance with Section 100D of The Local Government Act 1972 - Nil.