

**HOUSEHOLD WASTE RECYCLING CENTRES - REVIEW OF ARRANGEMENTS
FOR ACCESS BY CERTAIN COMMERCIAL-TYPE VEHICLES**
WDA/21/22

Recommendation

1. That Members approve the permanent use of the web-based household waste recycling centre (HWRC) Booking Scheme for control of access by Merseyside householders using certain commercial-type vehicles (such as vans and large trailers) to Merseyside's HWRC network.
2. That authority for any future required minor amendments to the scheme be delegated to the Chief Executive in consultation with the Authority Chairperson.

THIS PAGE IS INTENTIONALLY BLANK

**HOUSEHOLD WASTE RECYCLING CENTRES - REVIEW OF ARRANGEMENTS
FOR ACCESS BY COMMERCIAL-TYPE VEHICLES
WDA/21/22**

Report of the Chief Executive

1. Purpose of the Report

- 1.1 This report informs Members of the status of access control measures for commercial-type vehicles (such as vans and large trailers) at Merseyside's household waste recycling centres (HWRCs), public feedback in relation to the scheme during the last year and seeks Members' approval to continue the use of the electronic, web-based HWRC Booking Scheme as has been operated since the start of the covid pandemic.
- 1.2 The report also seeks Members' approval for authority for any future minor amendments that may be necessary to the HWRC Booking Scheme to be delegated to the Chief Executive in consultation with the Authority Chairperson.

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). This 'Permit Scheme' was paper-based, householders applying for a paper permit which was posted to their home address and the permit checked by staff on arrival at an HWRC to allow access.
- 2.3 During the course of the covid pandemic, the paper-based Permit Scheme was suspended and replaced with an electronic, web-based HWRC

- 2.4 Booking Scheme. This was done to reduce the need for face-to-face interactions between members of the public and staff at the HWRCs, whilst also mitigating the resource required to administer paper Permits in the office setting. Merseyside householders have since that time needed to make a booking either directly through the MRWA website or by phoning a dedicated telephone support number.
- 2.5 In addition, and given the significant demand on the network, the previously unlimited visits allowed for visits by vans and vehicles with large trailers for delivery of recyclable waste (predominantly green garden waste) was ended and a limit of 12 visits by householders with a van or large trailer in any rolling 12 months put in place for all waste types.
- 2.6 At the Authority meeting in September 2022 (Authority report WDA/20/21), Members were asked to approve the formal ending of the paper-based Permit Scheme and for it to be permanently replaced with the electronic HWRC Booking Scheme. At that meeting, Members approved a temporary continuation of the web-based HWRC Booking Scheme, to be reviewed after a further 12 months of operation.
- 2.7 This report provides an overview of the delivery of the scheme during the period since the September 2022 Authority meeting.

3. Overview

Access policy

- 3.1 The access policy arrangements implemented under the HWRC Booking Scheme and as have been in place since the start of the covid pandemic, are as follows:
- i) Any vehicle over 3.5 tonnes gross weight, or any trailer exceeding 3.0m external box dimensions, will not be allowed access to Merseyside's HWRCs.
 - ii) Cars or cars with a small trailer (defined as less than 2.0m external box dimensions) will not be required to be booked into an HWRC and no specific annual limits will be placed on site visits for these vehicles.
 - iii) Householders using 'vans' or with any trailer that is greater than 2.0m up to a maximum 3.0m external length will be required to make a booking to access an HWRC to deposit their household waste.

Note: a 'van' for the purposes of this approach is 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)

A copy of the leaflet handed out at site used to assist with public and site staff understanding and interpretation of the scheme is provided at Appendix 2 of this report.

- iv) 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 is for a Merseyside resident to make a booking via the MRWA website, as this will reduce administrative burden on the Business Services team. Where a person is unable to use a website, they will still be able to make bookings by telephone.

- v) 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 being delivered in a 'van' or large trailer.

Headline statistics

3.2 In the period from 1st October 2021 to 30th September 2022:

- There were a total of 84,194 bookings made by householders on Merseyside to visit an HWRC in a van or with a large trailer. Of these:
- 82,114 were made directly via the website (either from a PC or mobile phone/tablet)
- 2,080 were made through MRWA's dedicated telephone booking line

Note: Veolia estimate that the HWRC network receives approximately 3 million individual visits each year.

3.3 During this period, the Authority received a total of 8 complaints in relation to the booking scheme itself, which can be summarised as follows:

- 3 complaints relating to the 12 visit limit for green waste (complainants seeking unlimited access with a van/trailer for green waste disposal).
- 3 complaints relating to the 12 visit limit generally, (the complainants wanting unrestricted access with a van generally for unlimited visits for all household waste).
- 2 complaints that a booking system is discriminatory against van owners generally (i.e. when car users don't have to make a booking, the complainants wanting to visit without having to make a booking).

4. Options

4.1 The primary purpose for implementing access controls for commercial-type vehicles (such as vans and large trailers) at HWRCs is to prevent the deposit of non-household (i.e. commercial) waste. There are a wide-range of possible options for how this may be done (and not one standard approach adopted at HWRCs across the country) however, based upon local experience, it is considered that the most pragmatic, operationally effective and least cost options would be as follows:

Option 1: *Continue with the current web-based HWRC Booking Scheme and existing access policy arrangements.*

The current web-based HWRC Booking Scheme is a simple, bespoke system developed on IT systems currently operated by MRWA. This option would make permanent the approach which has been in place since the start of the covid pandemic.

Option 2: *End the use of the web-based HWRC Booking Scheme and return to the original paper-based Permit Scheme (and access policy arrangements) as were in place prior to the pandemic*

This option would see the return to the use of two different paper permits (one Annual and one Recycling) to be posted to Merseyside householders wishing to access the HWRCs with a van or large trailer. Householders wishing to deliver general waste in a van or large trailer would be limited to 12 visits per year whereas those wishing to deliver recyclable (generally green garden) waste in a van or large trailer would not have specified limits.

Option 3: Continue with the HWRC Booking system, but under the original (or other alternative) access policy arrangements

Such an approach would limit deliveries of residual waste in vans/large trailers to 12 per rolling calendar year but could allow unlimited bookings for 'recyclable' materials such as green waste.

Other HWRC access alternatives could be considered, including:

- Placing a reasonable annual limit on visits by cars generally;
- Not allowing an unlimited number of visits for recyclable wastes but increasing the 12 visit 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);
- Only allowing vans/large trailers access to specific HWRCs at specific times.

4.2 Given the impacts (both operational and financial) of the potential for 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 as an option here.

4.3 In addition, no limits are proposed to be placed on cars or small trailers at this time.

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 HWRC Booking 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. Whichever future arrangement is agreed, it will be subject to a final, permanent contract variation to the WMRC 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 wide 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 both administer and police at the site entrance.

6. Recommendation

6.1 Given the experience of the last year which would suggest the public are now used to the HWRC Booking Scheme and the general benefits that such a scheme affords site users, staff and the Authority, it is recommended that MRWA now approve Option 1 above and formally adopt the permanent use of the web-based HWRC Booking Scheme (under the policy arrangements as set out above) for the management of access for Merseyside householders delivering their waste to HWRCs in commercial-type vehicles such as vans and large trailers.

7. Risk Implications

7.1 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, costs for MRWA and operational impacts	5	4	20	<ol style="list-style-type: none"> 1. Implement an access control scheme for householders using commercial-type vehicles. 2. 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"> 1. Legal advice confirming acceptability of reasonable controls 2. Permit/booking scheme allows reasonable access to all Merseyside householders

Risk of contractor challenge to ongoing/permanent implementation (by contract variation) of booking system	2	2	4	<ol style="list-style-type: none"> 1. Evidence of success of scheme over recent years 2. Early discussion to be held with contractor around ongoing/permanent implementation
--	---	---	---	--

8. HR Implications

- 8.1 The commercial-type vehicle HWRC access scheme (either web-based HWRC Bookings or paper-based Permit Schemes) 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 would be required for the administration of the paper-based Permit Scheme.

9. Legal Implications

- 9.1 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.
- 9.2 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.

10. Environmental Implications

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

11. Financial Implications

- 11.1 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.

- 11.2 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 HWRC Booking Scheme to return to the paper-based Permit Scheme would result in an equivalent annual cost.

12. Conclusion

- 12.1 Controls over access to Merseyside's HWRC network for householders using certain commercial-type vehicles have historically been in place in an attempt to prevent deposit of trade waste. A paper-based Permit Scheme was put in place in 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.
- 12.2 Covid pandemic controls have now been removed from the HWRCs. Of an estimated c.3m HWRC visits during the course of the last year, some 84,000 visits were booked in a van or with a large trailer and there were just 8 complaints made in relation to the HWRC booking system. This low level of complaints would suggest that the booking system is working well for the vast majority of Merseyside householders.
- 12.3 This report is a summary review of current HWRC access arrangements and public feedback during the last year and seeks Member approval to make the current HWRC Booking Scheme permanent.
- 12.4 Subject to Member approval of the recommendation, authority to make any future minor, non-substantive amendments to the scheme (for example moving the 12 visit limit from a rolling 12 months to a calendar year) is requested to be delegated to the Chief Executive in consultation with the Authority Chairperson.

The contact officer for this report is: Ian Stephenson, Assistant Director -
Operations
7th Floor
No 1 Mann Island
Liverpool
L3 1BP

Email: ian.stephenson@merseysidewda.gov.uk
Tel: 07817 719 167

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

DRAFT

Appendix 1: Summary of pros & cons in relation to the HWRC scheme options

Option 1: *Continue to operate the current web-based HWRC Booking Scheme.*

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

- Pros:
1. Residents have been using the system successfully since it was put in place during 2020, and the relatively low level of complaints compared to number of bookings made would suggest Merseyside householders are comfortable with this approach.
 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 as per the previous system).
 3. It allows swift access for a resident with a van/large trailer (an electronic booking can be made up to the day before required access), whereas under the previous system, 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 under the paper Permit system).
 2. Some residents may have taken the opportunity to make 'unlimited' visits for the deposit of recyclable materials under the previous system (although accurate data on actual visits made is not available).

Option 2: *End the use of the web-based HWRC Booking Scheme and return to the original paper-based Permit Scheme (and access policy arrangements) in place prior to the pandemic.*

- Pros:
1. With the Scheme having been in place since 2010, and apart from during the course of the pandemic, many residents will historically have been used to paper Permits.

2. Once a household has a paper Permit (Annual or Temporary), they did not need to make an individual, separate booking on each occasion they wish to access an HWRC.

3. The original Permit Scheme allowed householders 'unlimited' annual visits with an Annual Permit for delivery of recyclable (most notably green garden waste) 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. 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 such as green waste.

Other HWRC access alternatives could be considered, including:

- Placing a reasonable annual limit on visits by cars generally;
- Not allowing an unlimited number of visits for recyclable wastes but increasing the 12 visit 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);
- Only allowing vans/large trailers access to specific HWRCs at specific times.

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 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 challenges 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 in each given visit).
 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.

Appendix 2: Current HWRC Van Booking Scheme leaflet

DRAFT