

Somerset Waste Board meeting
30 June 2017
Report for decision

Recycling Centres – Restricted Access Permits Scheme Review

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Forward Plan Reference:	SWB/17/03/07
Summary:	<p>This report outlines the findings of the review of the restricted access permit scheme after the first six months of operation.</p> <p>The review indicates that the scheme has been introduced and operated very successfully. However, some policy variations would be justified to better meet the needs of site users and/or site managers.</p>
Recommendations:	<p>That the Somerset Waste Board authorises the Interim Managing Director of the Somerset Waste Partnership to implement the following changes to the formal acceptance protocol (van & trailer permit scheme) at the Recycling Centres approved by the Board on 17th June 2016</p> <ol style="list-style-type: none"> 1. Remove time restrictions for permit holders at weekends allowing permit holders to have full access to any site during all opening hours. Implementation to commence with immediate effect, recognising the need for system changes, re-briefing of stakeholders and public communication. 2. To introduce, at the earliest opportunity, the automatic identification of the type/specification of vehicles that require a permit by adopting the Driver and Vehicle Licensing Agency criteria, identified in Appendix 8. 3. All vehicles classified as ‘N1’ will require a permit, those classified as ‘M1’ will not. Classifications of ‘N2, N3, M2 & M3’, will not be permitted access to any Somerset site under the permit scheme. This to commence with immediate effect, recognising the need for system changes, re-briefing of stakeholders and public communication.

	<p>4. To require camper vans and minibuses to be registered within the permit scheme with immediate effect, recognising the need for the system change, re-briefing of stakeholders and communication to those affected.</p> <p>In addition, members are asked to endorse the following policy which has, out of expediency, already been adopted:</p> <p>5. Allow any Somerset household to hold one permit for a purpose built single axle trailer AND one permit for an eligible commercial type van.</p>
<p>Reasons for recommendations:</p>	<p>At the SWB meeting on 30th September 2016, The Board requested that officers undertake a review of the scheme after six months of its operation.</p> <p>The information and data collected from that review has been used to form this report and direct the service enhancements recommended.</p>
<p>Links to Priorities and Impact on Annual Business Plan:</p>	<p>SWP Business Plan 2016-21, Item 3.2 – Consider, plan and deliver agreed options to tackle unauthorised commercial waste and waste from beyond Somerset being deposited at Somerset recycling sites.</p> <p>SWP Business Plan 2017-22, Item 5.3 - Following successful roll out of the van and trailer permit scheme in October 2016, a formal six month review to determine whether there should be any minor amendments to the current process, with proposed revisions to the June 2017 meeting.</p>
<p>Financial, Legal and HR Implications:</p>	<p>Financial;</p> <ul style="list-style-type: none"> • The cost of implementing and providing the permit scheme over the initial 6 month period that it has been in operation on sites (Oct 2016 – March 2017), is circa £38,000. • Over the 3 year life of the permit it is still expected that the costs will average at approximately £15k per annum. In preparation for the next round of Permit applications in 2019, it is likely that we will be able to further cut the cost of administration through more prevalent use of ‘e-permits’. • Waste tonnages through the sites (shown in Appendix 1) have reduced by an average of just over 11% in the first 6 months of the permit scheme (when calculated against the corresponding period in the previous year), this figure

	<p>increases to a 15% reduction (if measured against the trend from April 2016 to the permit introduction in October 2016), The tonnage reduction at 11% results in a financial saving in the region of £200k over this 6 month period.</p>
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<p>Equalities Implications:</p>	<p>An Equalities Impact Assessment has been completed for the current permit scheme and is attached as Appendix 9 to this report. A key issue identified is to continue to offer appropriate assistance with 'digital applications' made on-line and, alternatives to online applications to ensure that the digitally excluded are not adversely affected.</p>
<p>Risk Assessment:</p>	<p>There is a risk of;</p> <ul style="list-style-type: none"> • the relaxation of the weekend restricted access hours for permit holders prompting an increase in the amount of waste handled through the sites. • an under estimation of the number of additional new or amended (vehicle change or house move) permits that will be requested and therefore an under estimate of on-going permit costs. • failing to continue to promote an effective PR campaign communicating Recycling Centre permit changes to Somerset residents. • despite the permit scheme's short-term initial fly tipping impact being marginally up (4%) on the same period of the previous year, as predicted in the risk profile presented to the Board in June 2016, there may be additional incidents through the busier summer months. Although the recommended relaxation of permit holder access hours is expected to reduce the risk of fly tipping. This will be monitored. • continued concern from some Somerset residents regarding our classification of vehicles that require a permit. However, using DVLA classifications will provide a clear and independent means of clarification in such circumstances. • neighbouring authorities – all of which have similar controls – tightening their own resident permit policies, diverting more users into Somerset sites.

1. Background

- 1.1.** All residents of Somerset can use any of the 14 recycling centres to dispose of their recyclables and household waste for free. There are also two Community Recycling Sites located at Crewkerne & Dulverton that charge a £2.00 entry fee. Charges currently also exist for the deposit of non-household items such as hardcore, tyres, gas bottles, plasterboard & asbestos. Ten of the sites in Somerset now also provide access to 'paid for' commercial waste.
- 1.2.** As outlined in the June 2016 Board report, the permit scheme was proposed and subsequently adopted in order to address our evidence of cross-border use of Somerset Recycling Centres and to respond to restrictions in our neighbouring authorities, to continue to provide free access to Somerset residents transporting household waste material in standard non-commercial type vehicles and to control, via the permit system, the admittance of commercial type vehicles and trailers used by Somerset residents, in order to reduce congestion at peak site usage periods and to reduce commercial waste abuse.
- 1.3.** At the SWB meeting on 30th September 2016, The Board requested that officers undertake a review of the scheme after six months of its operation.

2. Review Methodology

- 2.1.** The review was undertaken by the project team that developed the original proposal. The team consists of Somerset Waste Partnership (SWP) officers, along with area and site managers from Viridor, who currently operate all of the Somerset Household Waste Recycling Centres (HWRCs) and Community Recycling Sites (CRSs).
- 2.2.** In order to inform this review of the van & trailer permit scheme, feedback has been received and considered from a number of sources;
 - completion of the contact complaint form provided for public access on the SWP, County & District Council websites
 - emails to the SWP 'enquiries' address and via partner authority customer service teams
 - letters seeking clarification or complaint
 - phone calls
 - direct contact with members of the public, both at the SWP offices and at the recycling centres
 - meetings with all 16 recycling centre managers & Viridor area supervisory staff
 - project team review meetings
- 2.3.** The number of enquiries and complaints recorded cover the period from the start of the scheme publicity in August 2016, to the permit review closure date of 31st March 2017. The customer contact statistics are shown in Appendix 3. Whilst the number of contacts shown in Appendix 3 relate to those that have been recorded (complaint forms, emails & letters), the issues shown and their respective weightings are very much representative of those customer contacts that have not been formally recorded (phone calls & face to face contact). The total number of recorded permit enquiries, administration communications

and complaints recorded was 528, with complaints accounting for 206 of that number.

- 2.4. At the conclusion of the review period on 31st March 2017, 22,200 permits had been issued with a total of 31,003 attempted applications via the SWP website.

As shown in Appendix 3, 8,803 attempted permit applications have been aborted, some of which will have been from ineligible out of county residents and some being commercial waste producers, that having read the terms and conditions, chose not to continue with their application. Many of these aborted or failed attempts will have been caused by the embedded postcode look-up database that prevents out of county residents from obtaining a permit. This automated process has worked extremely well.

- 2.5. As detailed in Appendix 3, the main areas of concern raised by those residents impacted by the permit scheme were;
- the restricted weekend access
 - the trailer restrictions (predominantly related to multi axle trailers)
 - vehicle classification disputes (mainly Land Rover related)

3. Summary of the data review documents referenced for this report

- 3.1. a) Appendix 1 – Tonnages
b) Appendix 2 – Weekend Site Usage
c) Appendix 3 – Enquiries & Complaint Statistics
d) Appendix 4 – Current Permit Scheme Terms & Conditions
e) Appendix 5 – Trailer Assessment
f) Appendix 6 – Vehicle Access Pictogram
g) Appendix 7 – Land Rover Permit Clarification
h) Appendix 8 – Definition of Vehicle Categories
i) Appendix 9 – Equalities Impact Assessment

4. Current 'Conditions of Use' for permit holders (Appendix 4) and Review Conclusions & Recommendations:

- 4.1. **Only Somerset residents are eligible for permits. This means that while residents from outside the county are not excluded from using Somerset sites, they cannot legitimately apply for a permit to use a van or trailer.**

When applying for a permit, residents are required to give their residential address. Any address not administered by Somerset County Council (SCC) is unable to complete their application and will not be issued a permit. This is an automated process on the SWP website with the address look-up linked to the Post Office Address database.

As shown in Appendix 1, since the restriction on 'Out of County' residents being able to use Somerset recycling sites, with permit type vehicles and trailers, was introduced, the waste tonnage being deposited at sites has reduced. This is no doubt partly due to these restrictions having an impact.

There is a summary of the number of ineligible applications attempted in Appendix 3. This summary does include a number of applications from residents of neighbouring authorities, but unfortunately we are unable to differentiate the exact numbers from the other categories of failed application attempts.

No change is recommended to this permit condition.

4.2. There is restricted access for permit holders to recycling sites at peak usage times. Permit holders weekend access is currently limited to use of the sites between 1pm & 4pm on Saturdays.

The weekend access restrictions account for 26% (53) of all recorded complaints made between the SWB approval of the scheme in June 2016 and the review cut-off point on the 31st March 2017 (Appendix 3). The detail of these recorded complaints, along with conversations with members of the public that SWP officers and recycling centre staff have had, both in phone calls and in person, show that there are more residents than anticipated who cannot access the sites at any time other than the restricted weekend access periods. Site weekend usage data is shown in Appendix 2.

This review has fully engaged with all Viridor site managers and area managers, via meetings, interrogation of the Viridor Health and Safety (H&S) report for the period and, from attending regular H&S meetings held with workforce representatives present.

Viridor managers' report that weekend restrictions have led to a high number of difficult incidents when access has been refused. Some residents have been observed parking outside during the restricted hours and walking their waste onto site through the vehicle access or exit roads, hampering traffic outside of sites and bringing safety concerns on site and on the highway.

These incidents are reflected in the current H&S report for the period (SWB 17/03/06).

Due to the results of the review, a recommendation is made to change this policy to remove all weekend time access restrictions. It is uncertain what effect this will have on congestion and possible queues, as figures in Appendix 2 (graph 2) show that there is already a period on a Sunday from approximately 11:00 a.m. to 1:00 p.m. when the number of visits reach the highest average number of the weekend. However, it is expected that removing restricted weekend access will reduce difficult incidents and safety concerns.

Based on the safety concerns raised and the feedback from Somerset residents and the site managers, the officer recommendation is that we remove the permit holder restricted weekend access, mindful that this may result in increased waste being handled by the sites.

4.3. Permits are only issued for a purpose built single axle trailer with one wheel each side and a maximum of 3 metres in length (internal dimensions of the loading bed/floor).

This restriction accounted for 24% (49) of all recorded complaints (Appendix 3).

The original reasoning behind this condition was reviewed again in detail, particularly the restriction that a 'multi-axle trailer is not able to be issued with a permit, even if under the 3 metre internal bed length requirement set out in the permit conditions.

The dominant factor looked at with regard to the multi-axle trailers was their load carrying capacity, even if within the prescribed size limit. This, along with other factors outlined in Appendix 5 was fully reviewed again. From the conclusions listed in Appendix 5 and those included in the June 2016 report:

No change is recommended to this permit condition.

- 4.4. Only vehicles up to 3.5 tonne Gross Vehicle Weight (GVW) will be issued with a permit. Vehicles of any design exceeding this weight are not eligible for a permit or site access and, will not be granted access to offload under the permit scheme.**

Any vehicle exceeding this weight is not eligible and will be refused entry. The current definition of vehicles accepted on site, along with the permit criteria in illustrated format can be seen in Appendix 6.

As shown in Appendix 1, there has been a reduction in waste tonnages at the Somerset sites since the implementation of the restriction on gross vehicle weight (GVW) and trailer size. It is believed that part of this reduction is due to the prevention of 'trade waste' brought to site in this type of vehicle since the permit controls were introduced.

No change is recommended to this permit condition.

- 4.5. There is a 'Permit Waiver' system available on all sites for those visitors that require a permit, but are unaware of the permit scheme on their first visit.**

The 'permit waiver' is recognised as working well for those unaware of the permit scheme and is welcomed by those managing the process on site.

No change is recommended to this permit condition.

- 4.6. When applying on-line for a permit, an applicant will receive an electronic confirmation (to be used as a temporary permit) that can be printed, or shown on a smart device screen at the sites.**

An applicant will receive two electronic confirmations, firstly via an e-mail receipt (clearly for this they must supply an e-mail address during the application process), the second is an e-permit that can be downloaded and printed out. For applicants without the ability to apply on-line, this can be completed at any Somerset library or by phone (with a paper confirmation then posted out if the latter).

The electronic confirmation can be taken to the site and shown to site staff either in paper form or via a smart device screen. This confirmation is valid for 21 days whilst the delivery of the plastic card permit is pending. It is expected, now permit application numbers have become more manageable, that it will be possible to

expand this electronic process in the future and save costs on producing and issuing the 'credit card' type permits.

No change is recommended to this permit condition.

4.7. Land Rovers without permanent fixed seats and restraining belts to the rear of the driver require a permit, whilst those with permanent fixed seats and restraining belts do not.

Since the permit scheme application process was first instigated in August 2016, there has been an on-going debate as to whether Land Rovers require a permit, are exempt, or a combination of both. We have concluded that the latter is the most appropriate position.

There are at least 8 variants of Land Rover and the measures we have taken to determine whether a permit is required or not, have become confusing to both site staff and the general public. This ambiguity has also led to the 3rd highest number of recorded complaints at 43 (21%), as shown in Appendix 3, the very large majority of which concern Land Rovers.

We currently state that Land Rovers without fixed seats and restraining belts to the rear of the driver require a permit, whilst those with fitted fixed seats and belts to the rear, do not. There is also specific guidance for Land Rovers on the SWP website as shown in Appendix 7. This unique clarification for this one type of vehicle became necessary, due to the variation of models causing disagreements on sites as to whether a permit was required.

We are therefore proposing a change to how the need for a permit is defined, with the aim of simplifying this process for all concerned and in preparation for an automated on-line look-up function to be added to the application process; not just for Land Rovers, but for all vehicles. If approved, the intention will be to modify the SWP website to an automated look-up of vehicle classification, in exactly the same way as we currently do with the 'address postcode look-up'. It will work on the following principle:

The Department For Transport (DFT) has already classified vehicles by type as to whether they are '*Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.*' or alternatively '*Category M: Motor vehicles with at least four wheels designed and constructed for the carriage of passengers*' (A full copy of the designations can be found in Appendix 8).

There is also a quick look-up of this information available to anyone that wishes to use it; via the GOV.UK - DVLA website. A free link to this information will also shortly be available to website designers.

It is that link that we would use to inform applicants if a permit is required and through this automated process prevent the current situation, where an application can be completed with erroneous/incorrect details and a permit issued that then has to be addressed on site - where it has become confrontational on occasion.

There will be a very small number of vehicles of an age where a classification is

not available. For these we will continue with the current process of dealing with them on a case by case assessment.

It is recommended that to simplify the process: we issue permits to any vehicle designated as 'N1' and exempt any classified as 'M1' by use of an automated classification look-up process. Classes M2, M3, N2 & N3 are to be excluded as they exceed the permit criteria already in place. The exceptions to this rule are camper vans and minibuses (referred to in section 4.12).

4.8. A permit for either a van or trailer is issued to a Somerset household, not both.

It became expedient at a very early stage in the implementation process to relax this rule and allow both a van permit and a trailer permit at a single household, for the following reasons;

- (a) This condition was very time consuming and virtually impossible to administer.
- (b) It had already been circumvented by the users.
- (c) It was in practice too restrictive on some households placing them at a disadvantage to others.

Although a permit for both a van & trailer is now available to those households that request them, it is very unlikely that they will both be in use at the same time. To ensure this is not commonly the case, this is now managed by the enforcement process put in place at the commencement of the permit process.

If both van and trailer are used very frequently, this is flagged up to the SWP via the ANPR monitoring system and can be queried.

The recommendation is that this amendment be endorsed and we alter this permit condition to allow one eligible commercial type van permit and one purpose built single axle trailer permit at a qualifying household.

4.9. Permit holding vehicles are not allowed to tow a trailer onto site.

This restriction is to minimise the time spent on site by a site user and reduce a trip hazard/collision Health & Safety risk.

Although this condition accounted for 18 recorded complaints (9%) as shown in Appendix 3 (12 of which were for vans, 4 for Land Rovers and 2 were for pickups), the review found the data confirmed this to be a valid condition with a reduction in average load weights. Previously, in the large majority of cases, a van would be fully loaded in addition to the trailer. This had the consequence of a much larger load taking longer to dispose of, resulting in a minimum of 2 bays (occasionally 3) being occupied for a considerable time.

In addition to the bays not being available to those waiting; before the permit scheme introduction, we commonly observed a situation where the trailer would be disconnected and pushed back or sideways (Appendix 5), across the road or

walkway, to allow access through the rear van doors. This would result in even more space being occupied by the now disconnected trailer, an obstruction (with a collision risk) to other vehicles on the access road, or a trip hazard to other pedestrians using the walkways.

No change is recommended to this permit condition.

4.10. Hire vans and trailers are allowed limited access under the ‘permit waiver’ scheme for a maximum of a 3 day hire period. All local hire companies have been made aware of these stipulations.

Upon completion of a ‘permit waiver’ form, hire vehicles and trailers are entitled to 3 days continuous use of the sites. The hirer cannot be a company or business, but the hirer can be a person that is not a resident of this County. This variation has been made to accommodate those that are assisting Somerset residents, such as moving home, or utilised for compassionate reasons at the site manager’s discretion. This policy has worked well in practice.

No change is recommended to this permit condition.

4.11. Businesses wanting to use the commercial waste facilities do not require a permit as they are paying for the disposal of their waste, but must comply with the size and access restrictions imposed by the permit scheme.

Companies and businesses choosing to use the commercial waste facilities do not require a permit as they are paying for the disposal of their waste, but must comply with the size and access restrictions imposed by the permit scheme. They may only deposit waste at a commercial waste licensed site. ‘Out of County’ access for commercial paying customers (including trailers) is permitted, as they are low in number and this is a completely separate transaction between Viridor and the customer, which has no financial consequence to the SWP or SCC.

This arrangement is seen as beneficial to all concerned, as it reduces the risk of the illegal disposal of waste carried in vehicles not eligible to use sites under the permit scheme.

No change is recommended to this permit condition.

4.12. Camper vans & minibuses do not require a permit.

This is a condition that causes confusion and claims of unfair treatment, both on site and in complaints to the SWP. We believe this is a valid argument, as the fact they do not currently require a permit means such vehicles can tow a permit registered trailer onto site, yet are predominantly the same size or larger than a commercial van.

Most camper vans using the sites are converted ‘commercial type’ vehicles, but because of the cost and the rigorous process they must go through to be re-classified as camper vans, this is seldom done, so they are still registered as commercial vehicles.

They are often only part converted, meaning they still contain a large load capacity similar to vans and are mostly of the 3.5 tonne GVW type vehicle.

The recommendation is to remove this discrepancy, so that all camper vans & minibuses require a permit in the future, as long as they comply with the specification of 'M1' (Appendix 8) and that those currently using sites without a permit be addressed through e-mail (where available), or through flyers and staff communication on sites with immediate effect.

4.13. Waste, carried on behalf of a third party, for which a payment has been agreed, cannot be brought to any site under the permit scheme.

This condition has always been in place on sites. It was simply re-iterated during the permit instigation to take the opportunity of using the publicity we were issuing as part of that process to raise awareness. The waste or recycling must therefore be disposed of as 'commercial waste' if any payment is taken to bring it to the site.

No change is recommended to this permit condition.

5. Summary of the Permit Scheme review period

- 5.1.** It is believed that a reduction in large cross border loads and apparent reduction in commercial waste, along with the lower capacity of vehicles and trailers allowed access to sites, has had the benefit of reducing time for unloading and, subsequently reduced queuing. Latest calculations show a slight reduction in the average load since the permit scheme commenced, which will have naturally resulted in faster unloading times.
- 5.2.** Although we have had a number of recorded complaints regarding the limitation of multi-axle trailers with a higher Gross Vehicle Weight (GVW) than we now permit, we have no records of any complaints at all caused by vehicles being limited to 3.5 tonne GVW.
- 5.3.** It is believed that financial savings have been achieved through the introduction of the permit scheme by tonnage reduction, but the exact level of such saving is impossible to align to the scheme alone.
- 5.4.** The current weekend restricted access for permit holders is considered to have presented more problems, with additional safety concerns and other incidents, than benefit. Officers therefore recommend that this condition can be relaxed.
- 5.5.** Whilst the relaxation of the weekend restricted access simplifies the position for permit holders it might lead to an uplift in the total tonnage being brought to the sites, reversing some of the significant reduction achieved since the scheme was implemented. Previous experience suggests that the easier it is to use our sites, the more waste is delivered. The impact however cannot be accurately estimated.
- 5.6.** Use of our 'permit waiver scheme' has been well received and used. Particularly in avoiding incidents on sites for those unaware of the permit scheme at their first visit and, for use on compassionate grounds when encountering those from outside the County dealing with bereavement or assisting a Somerset family member.
- 5.7.** Working with our strategic partner Viridor on the scheme implementation and

review has been a highly positive process involving area and site managers. We acknowledge and appreciate their continued involvement in this permit review process and continued support, both in the implementation of the scheme and monitoring its subsequent impact.

6. Other Options Considered

- 6.1.** As shown in Appendix 2 (Graph 1) there is currently a lull in visitor numbers at the 5 'open every day' sites on a Sunday afternoon. Opening this Sunday afternoon slot to permit holders was considered as an option to address those permit holders who cannot make use of a recycling centre on any day other than a Sunday. Whilst this would provide Sunday access at one site per District area and address some of the concerns expressed over such access, it did not address health & safety issues and other incidents caused by opening for only half a day on a Saturday.
- 6.2.** In order to remove the health and safety issues and other incidents, caused by limiting access to permit holders for only part of a Saturday, consideration was given to allowing access for the whole of the Saturday opening hours in order to remove the artificial break currently embedded within the scheme conditions. Whilst it is believed this would solve a number of the issues regarding on site incidents and health & safety concerns, it did not address the problem for those permit holders who can only visit the recycling centres on a Sunday.
- 6.3.** Relaxation of the trailer restriction criteria, to allow access to multi-axle trailers, was very closely scrutinised with all aspects of their use on sites considered. Due to the extra capacity that a trailer with more than one axle can carry and for the reasons laid out in Appendix 5 - the recommendation is that there be no change to this condition at this time. However, further data on the probable numbers of higher capacity trailers will be collected over the period from now until the current permit expires. This data will then be collated and further reviewed, and presented to the Board, before the terms & conditions for issue of the next '3 year' permit (October 2019 to September 2022) are finalised.

7. Background papers

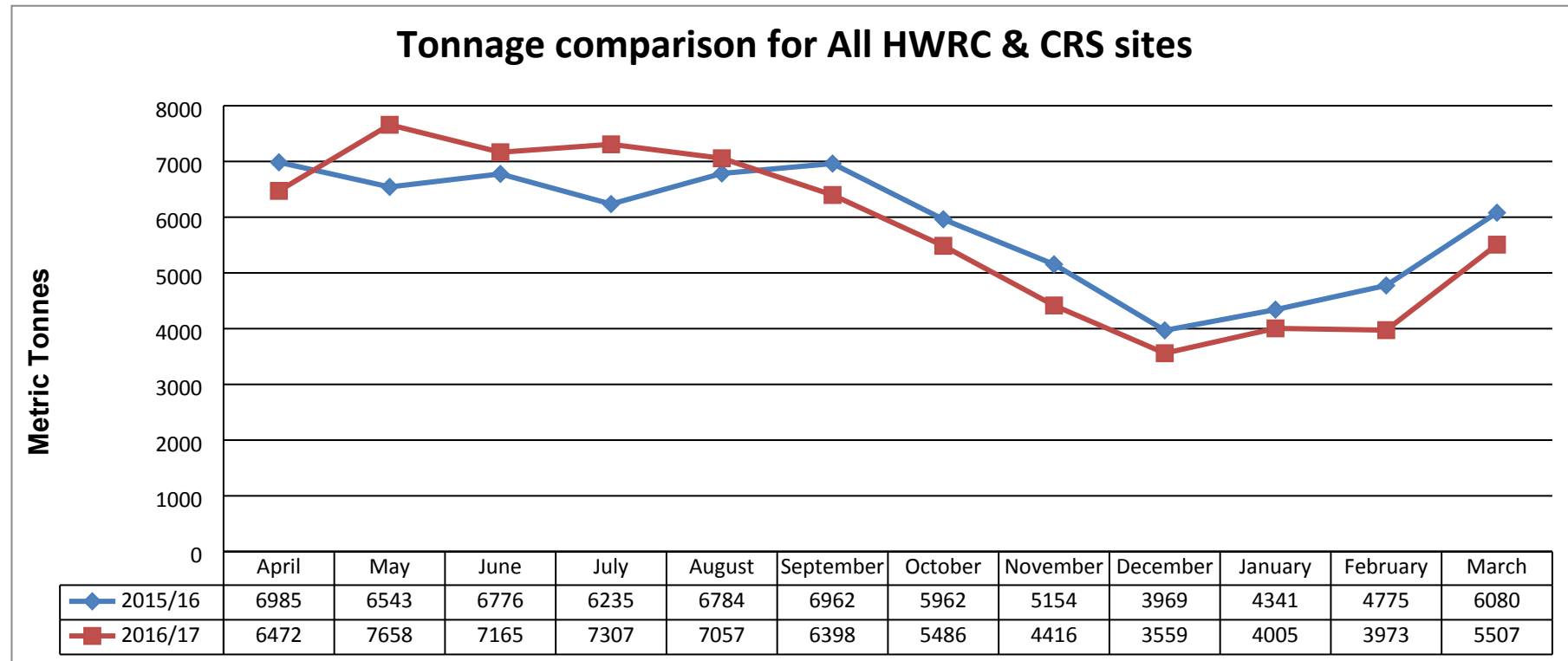
- 7.1.** Report SWB/16/03/09 – Recycling Centres (Restricted Access Permits) 17th June 2016.

Appendix 1

Total Monthly Waste Tonnage Comparison

The graph below illustrates a direct comparison between the waste tonnages for the financial year 2015/16 and 2016/17.

For reference: The Formal Acceptance Protocol (Permit Scheme) publicity and application process commenced on the 8th August 2016 and, the permit restrictions on all Somerset Household Waste Recycling Centres (HWRCs) and Community Recycling Sites (CRSs) commenced on the 3rd October 2016.

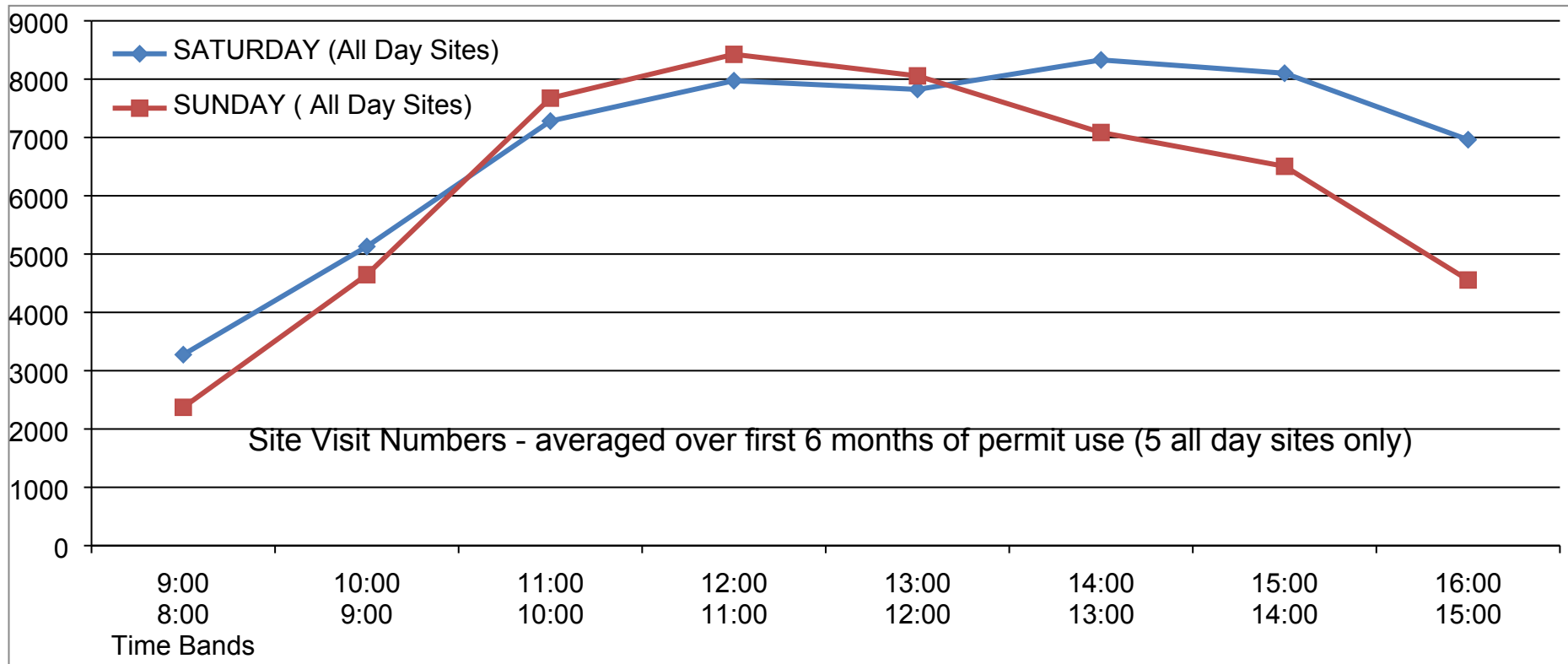


Appendix 2

The graph below shows the weekend site usage figures provided by the Automatic Number Plate Recognition (ANPR) cameras in use at Somerset HWRC's and CRS's. These numbers relate to the visits to the 5 sites that remain open 7 days a week, including all day on Saturday and Sunday and, gives a direct comparison between the two days.

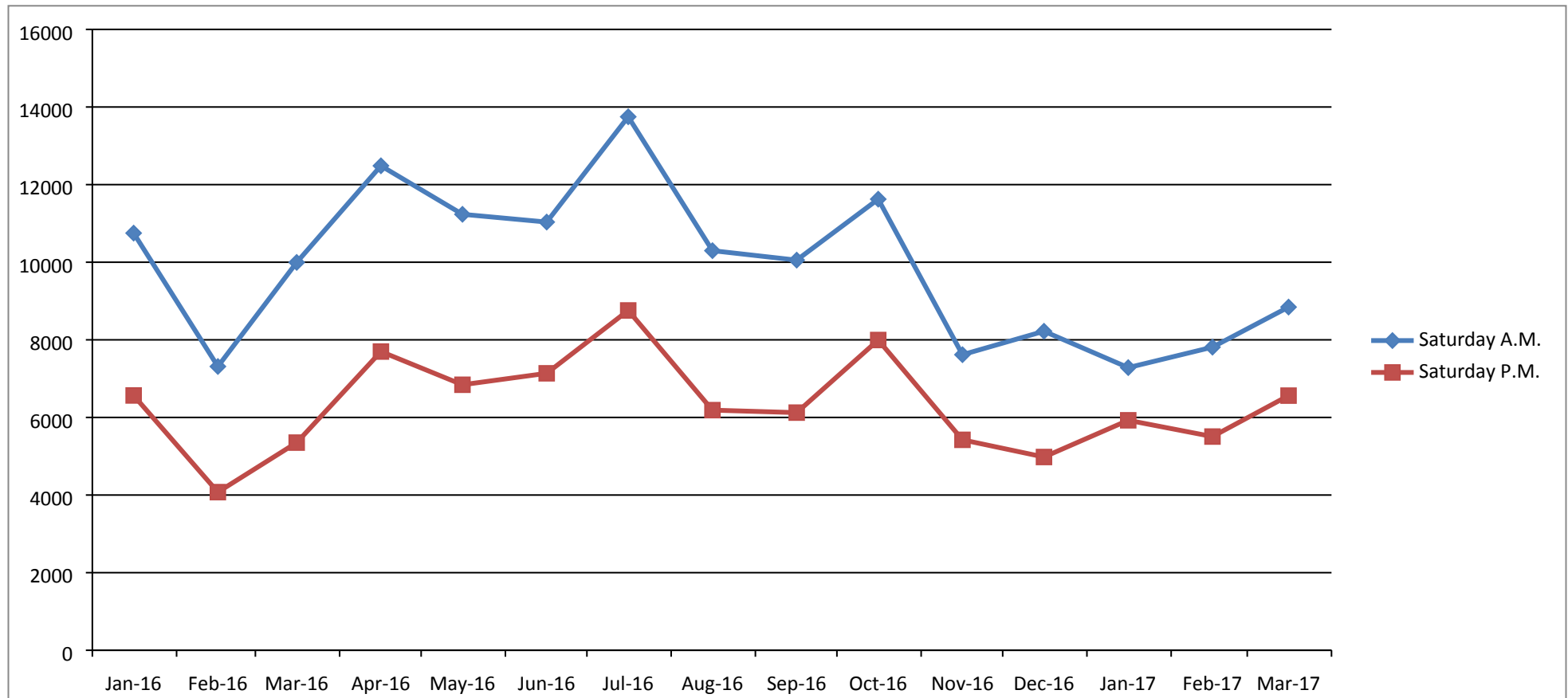
There is one all day site located in each Somerset area, namely Bridgwater, Frome, Minehead, Taunton & Yeovil.

Graph 1



Graph 2

This graph shows the morning and afternoon visit number for the 5 all day sites on a Saturday and illustrates how the numbers in the a.m. and p.m. periods have become more evenly matched since the introduction of permits. Also shown is the more even distribution of site visit numbers and the smoothing of the peak numbers.



Appendix 3

Permit Scheme Enquiries & Complaints

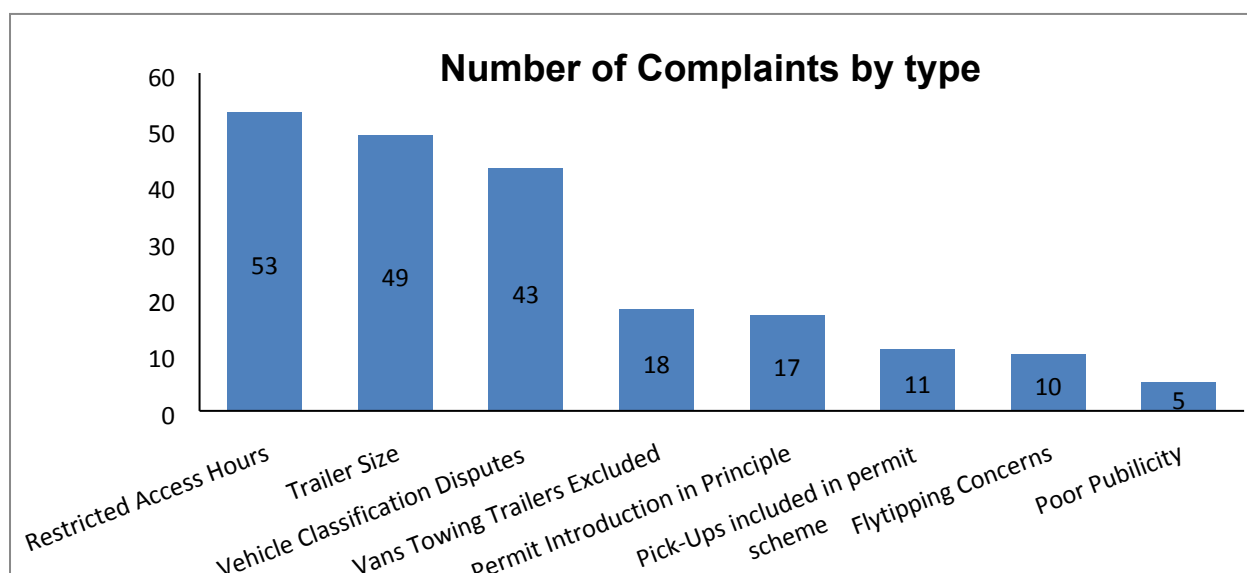
The following information has been captured and collated during the review period for the 'Formal Acceptance Procedure' (permit scheme) during the period from when the scheme was approved by the SWB on the 17th June 2016 to the 31st March 2017, the end of the review period previously agreed by the SWB.

Where possible all complaints were recorded in writing, although there were a small number that were handled either directly by phone, or in person if encountered whilst a member of SWP staff was on a site or via public visits to the SWP office. It is believed that the recorded complaint subjects are representative of all the complaints received

All figures shown are for the period commencing 17th June 2016 until 31st March 2017 unless otherwise stated	
Number of Households eligible for permits (based on Council Tax data at 31st December 2016)	252,998
Total number of attempted permit applications	31,003
Permit number issued (including replacements for lost permits & detail changes for address and registration numbers)	22,200
Number of Permit enquiries, complaints and administration communications/contacts	528
Total number of complaints (included within the total number of contacts above)	206

Using the number of households in Somerset (252,998) as the base figure, the complaint percentage is only 0.08%. However, we believe a more meaningful way to calculate the percentage of complaint is to take the number of successful applicants as the base number (22,200, as of the 31st March 2017), as these would appear to be the site users most affected by the changes through having to obtain a permit. This gives a complaint percentage of 0.93%.

The nature of the complaints broken down into headline categories is shown below.



Appendix 4

Terms & Conditions for Permit:

- Only one van permit and/or one trailer permit will be allocated per household.
- You accept the restrictions on access for vans and trailers as specified in our Permitted Vehicles guidance page.
- You must not bring waste to a recycling site for which you have taken payment to transport or deposit, even if it is from a household.
- Commercial waste cannot be deposited at any Somerset recycling site under the applied-for permit.
- The site operator (Viridor) has instructions to enquire as to the origin of waste being deposited if they suspect the waste is not from your household.
- Somerset Waste Partnership reserves the right to make further enquiries regarding the source of the waste and, if found to have originated from a commercial source; will seek to take legal action against the vehicle driver.
- The site operator (Viridor) has the authority to refuse use of the site to anyone suspected of depositing commercial waste as household waste.
- Failure to comply with the site operator's compliance checks may result in the withdrawal of your permit.
- Permits are not transferable and should be destroyed if you no longer use the van or the towing vehicle(s) for which the details are shown on the permit. A new permit with the correct vehicle details will be required by making a new application.
- All permits remain the property of Somerset Waste Partnership and will be withdrawn if these terms and conditions are breached.
- These terms and conditions, and others relating to use of recycling sites and other waste services, may be changed at any time without prior warning.

I have read and accept the permit terms and conditions.



Terms & Conditions for data held

Your data will be held for the purposes of processing your permit application, monitoring site usage, and renewal reminders. Beyond these uses, we will not share your data with any third party, except where we are legally required to or in order to ensure compliance with the terms of use of our facilities.

I have read and accept the data terms and conditions.



Appendix 5

Restrictions on Trailers

Although it is understandable why some site users prefer to use trailers, such as keeping their vehicle clean, the ability to add extra capacity and the convenience of loading/unloading, it is a fact that they can cause issues on sites for the following reasons.

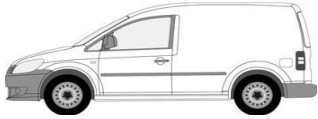
- Research showed that a professionally manufactured (braked) double axle trailer, meeting the length specifications we currently permit, can legally carry well in excess of 2 tonnes. It should be noted here that we make no stipulation as to whether a trailer must be braked or un-braked, or limit their width at all.

As one of the aims of the permit scheme was to reduce maximum unloading times and ease congestion where possible, it was agreed that the capacity of the trailer be the deciding factor. This was achieved by the purpose built single axle, single wheel each side requirement for a permit. This has the additional benefit of simplifying the criteria for a trailer and making enforcement of that criteria manageable for site staff (whilst avoiding disagreements or confrontation on sites),

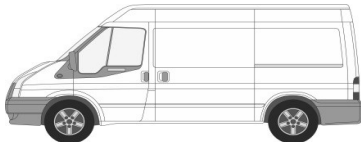
- A vehicle and trailer take up more than one parking bay (on occasion up to 3 bays can be obstructed).
- Not all drivers are able to reverse the trailer into a space, which means they wait until they can drive into a bay - resulting in backed up traffic and under-utilised bays.
- The smaller trailers constitute a trip hazard to other site users that have their vision obscured by carrying waste.
- Drivers often disconnect the trailer from the vehicle and push it across the walkway. Again, causing a trip hazard, or across the access road, causing a major obstruction and risk of collision and confrontation.
- On occasion, trailers are even pushed alongside the particular container the visitor wants to use, thus blocking use of that container to other site users until they finish and remove the obstacle.
- If an automated parking signal system is in use (such as at Chard HWRC) the trailer of a vehicle will often cover the sensor for the automatic signal system in the bay behind. This results in the computerised parking system being unreliable and giving incorrect information to vehicles waiting for an available space. If this system is rolled out to any other sites in due course, the same problems will be experienced elsewhere.

Appendix 6

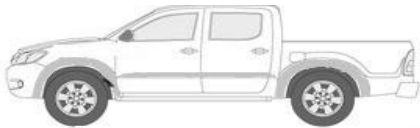
Vehicles accepted on sites with a permit



Small van



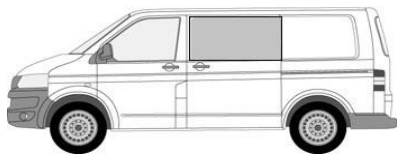
Van up to 3.5t GVW



Pick-ups – single or double cab

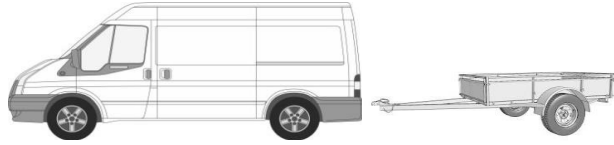


Single axle trailer- less than 3 metre long floor length

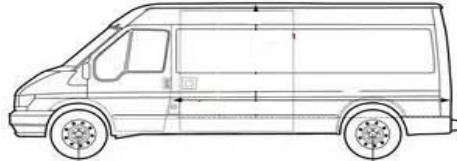


Car-derived van

Vehicles NOT accepted on sites



Van or Pick-up up to 3.5t GVW with trailer



Vehicle over 3.5t GVW



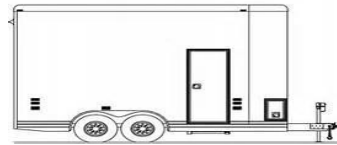
Box van (Luton body)



Multi-axle trailer



Single axle trailer - Over 3 metre long floor length



Horse box and box trailer



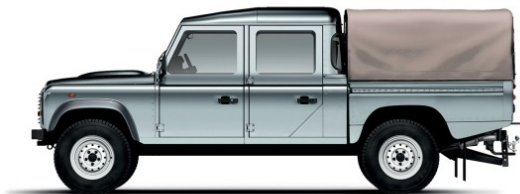
Agricultural Vehicle

Appendix 7

Land Rover Permit clarification

Needs a Permit

- Land Rover Defender 90, 110 and 130 pick-up, single or double cab - separate cab from rear body – open back, hard top, soft top – **NEEDS PERMIT**

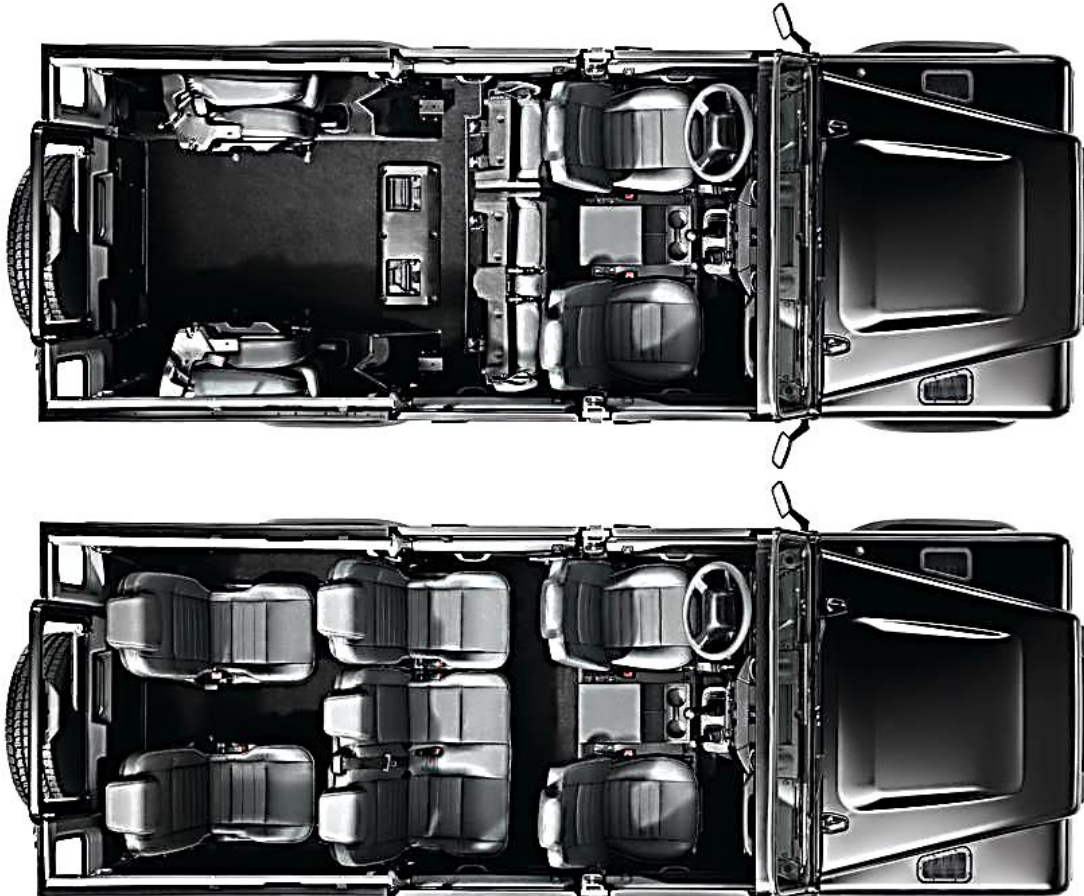


- Land Rover Defender 90, 110 or 130 with compartment separator and no seats (with restraining belts) in rear compartment - **NEEDS PERMIT**



Does Not Need a Permit

Land Rover Defender 90, 110, 130 with fitted seats & restraining belts – **NO PERMIT**



Land Rover Discovery/Sport – **NO PERMIT**

Land Rover Freelander – **NO PERMIT**

Range Rover – **NO PERMIT**

Appendix 8

dft.gov.uk - Vehicle Certification Agency

Definition of vehicle categories

1. Extracted from 2007/46/EC as last amended by 385/2009)

Vehicle categories are defined according to the following classification: (Where reference is made to "maximum mass" in the following definitions, this means "technically permissible maximum laden mass" as specified in item 2.8 of Annex I of the above Directive.)

Category M: Motor vehicles with at least four wheels designed and constructed for the carriage of passengers.

- **Category M1:** Vehicles designed and constructed for the carriage of passengers and comprising no more than eight seats in addition to the driver's seat.
- **Category M2:** Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass not exceeding 5 tonnes.
- **Category M3:** Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass exceeding 5 tonnes.

The types of bodywork and codifications pertinent to the vehicles of category M are defined in Part C of this Annex paragraph 1 (vehicles of category M1) and paragraph 2 (vehicles of categories M2 and M3) to be used for the purpose specified in that Part.

Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.

- **Category N1:** Vehicles designed and constructed for the carriage of goods and having a maximum mass not exceeding 3.5 tonnes.
- **Category N2:** Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 3.5 tonnes but not exceeding 12 tonnes.
- **Category N3:** Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 12 tonnes.

<p>Impact Assessment Form and Action Table 2014 - 2016 (Expand the boxes as appropriate, please see guidance www.somerset.gov.uk/impactassessment) to assist with completion)</p>			
<p>"I shall try to explain what "due regard" means and how the courts interpret it. The courts have made it clear that having due regard is more than having a cursory glance at a document before arriving at a preconceived conclusion. Due regard requires public authorities, in formulating a policy, to give equality considerations the weight which is proportionate in the circumstances, given the potential impact of the policy on equality. It is not a question of box-ticking; it requires the equality impact to be considered rigorously and with an open mind."</p> <p>Baroness Thornton, March 2010</p>			
<p>Why are you completing the Impact Assessment?</p>			
Following the 6 review of an existing policy; changes have been recommended	Change to Policy or Service ✓	MTFP or Paper	Service Review or SCC Change Programme
What are you completing the Impact Assessment on (which policy, service, MTFP reference, cluster etc)?		Waste Acceptance Criteria at Somerset's Recycling Centres/Community Recycling Sites	
<p>Section 1 – Description of what is being impact assessed</p>			
<ul style="list-style-type: none"> The 'formal acceptance protocol' (permit scheme) implemented for controlling waste entering Somerset's 14 Recycling Centres and 2 Community Recycling Sites: - <p>Every Somerset household that requires use of one of Somerset's Recycling Centres/Community Recycling Sites for vans or trailers is required to either complete an on-line permit request form (accessed via the Somerset Waste Partnership website), or a paper version available from Somerset libraries.</p> <p>Provided the postal address is registered as a Somerset property and, the resident declares they are delivering their own household waste but only have access to a commercial type vehicle (including trailers) for this purpose, a 'Commercial type Vehicle Resident Permit' is issued that allows free access to any of the Somerset Recycling Centres or Sites for a period of up to 3 years.</p>			
<p>Section 2A – People or communities that are targeted or could be affected (for Equalities - taking particular note of the Protected Characteristic listed in action table)</p>			
<ul style="list-style-type: none"> Residential population of Somerset who wish to use Somerset's Recycling Centres or Community Recycling Sites; Non-Somerset residents who wish to use Somerset's Recycling Centres or Community Recycling Sites; 			

- Businesses currently making unauthorised use of Somerset’s household recycling sites.

This is a broad population and the assumption must be that members of all protected characteristic groups exist within the group when making decisions.

Section 2B – People who are delivering the policy or service

Somerset Waste Partnership on behalf of Somerset County Council and Viridor Ltd

Section 3 – Evidence and data used for the assessment (Attach documents where appropriate)

Somerset Waste Board Report & Appendices (Recycling Centre Restricted Permit Access). Report reference number SWB/17/03/07

Section 4 – Conclusions drawn about the impact of the proposed change or new service/policy (Please use **prompt sheet** in the guidance for help with what to consider):

Community Safety

There remains a small risk that non Somerset residents not eligible for a ‘Commercial Vehicle Resident Permit’ will instead fly tip their waste within Somerset. This is mitigated by continued publicity both on site and via local/regional media releases. Our neighbouring authorities are aware of the ‘permit scheme’ and regular 3 monthly meetings are held with them to manage and co-ordinate enforcement action.

The on-site management of the scheme has the potential to create tension when a person is unaware and has no permit on the first visit. This is largely managed by the use of a ‘permit waiver system’ that allows one visit without a formal permit and, a non-confrontational policy by staff.

The permit waiver scheme operates: by the resident completing a declaration form confirming their Somerset residence, vehicle details and name. Information will be provided to them on how to obtain a permit prior to their next visit to site. Further mitigation is achieved by continued wide ranging publicity of the changes on a regular basis, with particular emphasis on “on site” publicity.

Equality

In providing both on-line access, library based on-line access and, paper permit application systems (allied to telephone support available where “self-serve” might be difficult), we mitigate the impact on those without access to the internet, or for whom web access is challenging.

Open access to all Somerset residents displaying a permit will be maintained.

Health and Safety

Leaflets are handed out on sites informing sites users of the scheme and regular local media releases continue to inform the majority of users and avoid unnecessary confrontation on site.

Use of the 'permit waiver scheme' with one free visit, also assists in removing confrontational situations.

Health and Wellbeing

No Health & Wellbeing impacts identified for this proposal.

Privacy

There is a requirement for residents to provide their names, property address and vehicle registration details as part of the permit application process. This data is first captured via the Somerset Waste Partnership website. Where there is a need to hold, process or transfer this data it will be done in accordance with current legislation, ensuring the security of any personal data.

Any paper records will be stored securely and, securely destroyed once processed.

Sustainability

Through implementing the restricted access permits, greater control of the waste delivered to the Somerset Recycling Centres has been gained, which in turn focuses the reducing budget to deal with Somerset resident's other waste needs.

Risk

There is a risk of:

An under estimation of the number of permits that will be requested - currently based on 20,000 initial applicants and on-going permit costs of circa 15k per annum. Failing to promote an effective PR campaign. Mitigated by the SWP's PR that continues to make Somerset residents aware of the permit scheme.

That a small quantity of waste will be fly tipped by those residents either unwilling or not eligible to apply for a permit – this presents a reputational risk with District Council partners, but is mitigated by the existing fly tipping repayment mechanism between SCC and the Districts.

There are reputational business risks associated with accusations of lack of effective publicity; inadequate subscriptions systems and processes; dramatic spikes in customer enquiries in future years embedded in the process - by renewals happening on the anniversary of the "switch on" date.

Risk of I.T. system failure or website processes for permit issue being available.

That relaxing the weekend restricted access hours for permit holders may prompt an impact in the amount of waste handled through the sites.

Likelihood	2	Impact	2	Risk Score	4
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Section 5 – After consideration please state your final recommendations based on the findings from the impact assessment. Also include any examples of good practice and positive steps taken.

1. The amendment of the 3 yearly ‘free on request’ Countywide ‘Commercial Vehicle (including trailers) Permit’ with a restriction policy at peak usage times (Weekends) that came into effect from 3rd October 2016.

Section 6 - How will the assessment, consultation and outcomes be published and communicated? E.g. reflected in final strategy, published. What steps are in place to review the Impact Assessment

This assessment will be presented as an Appendix to the Somerset Waste Board Report (Recycling Centre Restricted Permit Access) review due to be taken on the 30th June 2017.

Recommendations from this assessment will be reflected in the delivery of the changes.

Completed by:	Terry Richards, Senior Officer, SWP
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Date	28 th April 2017
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Signed off by:	David Oaten, Contracts Manager, SWP
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Date	28 th April 2017
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Compliance sign off Date	
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To be reviewed by: (officer name)	David Oaten, Contracts Manager, SWP
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Review date:	30 th June 2018
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Version	001	Date 28th April 2017	
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Equality Impact Assessment Issues and Action Table

Identified issue drawn from your conclusions	Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?	Who is responsible for the actions?	When will the action be completed?	How will it be monitored?	What is the expected outcome from the action?
Age					
<p>There may be issues with completing the permit application on line</p>	<p>People over retirement age are more likely to have limited or no access to the internet.</p> <p>Arrangements are in place for local libraries to provide IT access points and support for on-line permit applications.</p> <p>In addition to the on line application process, a postal option, supported by telephone advice, is provided for those without computer skills or access</p> <p>Where the resident has not requested a permit and attends site their first visit will be allowed, with advice from site staff about how to apply for a permit prior to next visit.</p>	<p>Somerset Waste Partnership</p>	<p>The actions were implemented on August 8th 2016.</p>	<p>Postal applications are managed by Somerset Waste Partnership</p>	<p>Equal access to the permit application process for those with and without computer skills or access</p>

Disability					
There is a small risk that the application process would create a barrier to people with mild learning difficulties, who are otherwise living independently	Mitigations as per "Age" would apply, in particular alternative means of subscribing and coaching by site staff on first trip to site.				
Gender Reassignment					
No Impact Identified					
Marriage and Civil Partnership					
No Impact Identified					
Pregnancy and Maternity					
No Impact Identified					
Race (including ethnicity or national origin, colour, nationality and Gypsies and Travellers)					
No Impact Identified					
Religion and Belief					
No Impact Identified					
Sex					
No Impact Identified					
Sexual Orientation					
No Impact Identified					
Other (including caring responsibilities, rurality, low income, Military Status etc)					
No Impact Identified					