

Somerset Waste Board meeting
28 June 2019
Report for decision

Recycling Centres – Van & Trailer Access Permits

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Forward Plan Reference:	SWB/19/01/03
Summary:	This report recommends that Somerset keeps the formal acceptance protocol (permitting) in line with the present scheme terms and conditions at all Recycling Sites, to continue to reduce congestion at peak usage times, maintain control on the deposit of waste from out of county sources and limit the use of commercial type vehicles.
Recommendations:	That the Somerset Waste Board approves the continuation of a formal acceptance protocol (permitting) at Recycling Sites in line with the approach set out in paragraph 1.4 of this report.
Reasons for recommendations:	<p>To continue to mitigate large scale cross-border use of Somerset Recycling Sites and respond to restrictions in our neighbouring authorities.</p> <p>To continue to provide free access to Somerset residents transporting household waste material in standard non-commercial type vehicles.</p> <p>To control, via a permit system, the admittance of commercial type vehicles and trailers used by Somerset residents, to reduce congestion at peak site usage periods and to reduce commercial waste abuse.</p>
Links to Priorities and Impact on Annual Business Plan:	Business Plan 2019-24, Item 1.4.2 – Reviewing the services we provide at the recycling sites.
Financial, Legal and HR Implications:	<p>Financial;</p> <ul style="list-style-type: none"> • Prior to the commencement of the van & trailer access permits from October 2016, it was indicated to the Board in

June 2016, a 3-year scheme administration cost of £37,000.

- The actual scheme costs have amounted to;
 - £38,076 in 2016/17 – inclusive of pre-start site surveys, advertising, site signage, website development, contribution to the Library Service for their support to applicants without IT capability and the issue of 22,048 permits
 - £12,116 in 2017/18 – additional website costs plus the issue of 11,589 permits
 - £8,114 in 2018/19 – the issue of 8,782 permits
 - Budget of £8,800 for 2019/20 – for the months of April & May 2019, 1,617 permits were issued
- Total scheme costs amount to £58,306, 57% more than the indicative costings at the commencement of the scheme
- As outlined in the June 2016 report there was a risk that an underestimate of the number of permits requested could occur, the initial estimate was 17,000 per annum (a total of 51,000) whilst the actual to date (October 2016 to 31st May 2019) has been 44,036, therefore well within the number previously reported
- Whilst not all of the recent tonnage reduction that we have seen through the recycling sites – an aggregate reduction of 9,272 tonnes when compared to the 2015/16 ‘all sites’ tonnage of 73,719, since the restricted access permit introduction in 2016, can be directly attributed to the scheme, there has nether the less been a tonnage cost saving of circa £226,000 over that period, giving a net (including permit costs) saving of £167,000.
- Over the initial three years of the permit system, it was expected that the costs and savings would at least break even. This in addition to the benefit of reduction in site congestion.
- Despite highlighting a potential risk of increased fly tipping resulting from the introduction of the restricted access permits in 2016 and the resultant increased costs to partner authorities in having to deal with such incidents, we have seen an aggregate reduction of 2,195 incidents when compared to the 2015/16 total of 5,261 incidents.

<p>Equalities Implications:</p>	<p>An Equalities Impact Assessment was completed for the proposed permit scheme in 2016 and is still relevant, so an updated version is attached as Appendix 1 to this report. A key issue that emerged from the Equalities Impact Assessment was to have appropriate 'assisted digital' and alternatives to online applications to ensure that the digitally excluded were not adversely affected. This has worked very well with the assistance provided by the Library Service.</p>
<p>Risk Assessment:</p>	<p>There is a risk of;</p> <ul style="list-style-type: none"> • our neighbouring authorities (those who have not already imposed access restrictions) implementing similar policies, diverting current export tonnages (Somerset residents using other authority sites) back in to Somerset sites • failing to promote an effective PR campaign prior to the scheme renewal date, mitigated by the SWP's previous good record in communicating Recycling Site changes to Somerset residents • based on previous experience, any form of access restriction may increase fly-tipping. This will be mitigated by effective promotion campaigns and message reinforcement on the permits, while reduced congestion at sites should also continue to reduce fly-tipping. The existing fly-tipping subsidy will continue to recompense any additional collection costs, by the County Council to the partner District Councils.

1. Current conditions of use at Somerset Recycling Sites

- 1.1. Currently 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 also provide access to 'paid for' commercial waste.

Somerset currently provides access permits to certain vans and trailers, in line with the Van & Trailer Access Permits terms and conditions.

Due to the location of many of our sites, bordering county neighbours such as Dorset in the South and Bath & North East Somerset (B&NES) to the North, it is believed that a significant number of non-Somerset residents use Somerset sites. In addition to this natural influx of non-residents, a number of the bordering councils have some form of usage restrictions in place that further encourages additional residents to travel across the county border to use the Somerset sites in preference to their own. The restrictions a number of our neighbouring

authorities have in place ensure that Somerset residents are unable to access their sites in the same manner.

1.2. Summary of Somerset's Van & Trailer Access Permit

1. A 3-year 'free on request' permit scheme for all vans up to a 3.5 tonne Gross Vehicle Weight (GVW) and single axle trailers up to 3 metres in length, effective since 3rd October 2016.



2. The type of trailer that a permit is issued for is a single axle, with one wheel on each side, and to a maximum of 3 metres in length.
3. The limit of commercial type vans is 3.5 tonne GVW.
4. A permit for a van and/or trailer is available to each Somerset residential address, but that a van and trailer permit cannot be used in conjunction.
5. Hire vans and trailers are allowed access upon proof of a hire period agreement of 3 days or less being required and produced upon entry to site before off-loading.
6. The existing ANPR system is used for monitoring purposes and for contractor site staff to monitor usage and compliance, further use of this technology is used to identify potential abuse of the permit scheme.
7. Businesses wanting to use the commercial waste facilities do not require a permit as they are paying for the disposal of their waste. Businesses are however required to abide by the van & trailer size restrictions imposed by the permit scheme.
8. Out of County access for commercial type vehicles (including trailers) are not included or allowed as part of the permit scheme.
9. Where a dispute arises regarding vehicle classification, reference to the vehicles DVLA V5 document determines whether a permit is required or not.
10. In situations where a Somerset resident is not able to access the on-line method of applying for a permit, the Library Service continues to provide digital assistance as required.
11. The permit schemes existing terms and conditions can be found in full here

1.3. Review Process for the Van & Trailer Access permit

In order to review the van and trailer access permit terms and conditions we;

- Investigated the level of customer complaint and contact
- Reviewed the off-site impact of the access restrictions (fly tipping)
- Examined what other authorities are now doing
- Held site manager meetings to review their feedback to the scheme
- Undertook a targeted survey of 9,500 permit holders
- Reviewed the possible impacts of new legislation
- Consulted with the SWB Senior Management Group

Since the inception of the scheme from October 2016, only 39 formal complaints have been recorded, ranging from concerns about the policy itself (19), that double axle trailers are excluded from the scheme (8), those needing clarification on the type of Landrover impacted (4), the restriction on van size (4), issues with camper van classification (3) and concern that pick-ups required a permit (1). Whilst there was significant 'non-formal' customer contact at the commencement of the permit scheme, this has reduced to circa 5 contacts per week, predominantly seeking advice or clarification rather than complaint. From a customer engagement & contact perspective, it is believed the current permit scheme terms and conditions do not need amending.

Fly tipping impacts have been reviewed since the commencement of the permit scheme, with the countywide year on year totals shown below. From this it is clear that the introduction of the permit scheme in 2016 has not had a detrimental impact on the number of fly tipping incidents in the county, in fact it could be considered that the existence of a permit scheme and the transparency that this brings has had a positive impact on fly tipping. It is believed that the on-site management of those residents that turn up without knowledge of the permit scheme has also mitigated the impact on fly tipping numbers.

- 2015/16 – 5,261 incidents
- 2016/17 – 4,852 incidents
- 2017/18 – 4,629 incidents
- 2018/19 – 4,107 incidents

It is still clear from the review of other local authority access restriction schemes that we remain toward the median. Many similar schemes exist but most are more restrictive with regards trailer length and van size. For this reason, it is believed our current terms and conditions are fair in comparison to other like schemes.

Whilst the site manager meetings provided the opportunity for robust debate around the scheme administration and detail, the unanimous result was that there should be a recommendation for no change from the current scheme terms and conditions. The site managers reported that there had been clear improvements in site congestion since the introduction of the permit scheme and that their ability to challenge potential commercial waste abuse had also improved.

Through a targeted survey of 9,500 existing permit holders, we received 2,033 returns, a 21.4% response rate. Given that we had over 2,000 replies, it is believed that this gives a 95% confidence rate that the overall view expressed is fair and representative of all permit holders. The detailed results are shown in Section 3 of this report, the findings again point toward maintaining the permit schemes current terms and conditions.

It is still unclear whether new legislation will be introduced, resulting from the Resources & Waste Strategy, that may impact the operation of the permit scheme. Should, following the planned national consultations, there be legislation focused on local authorities providing a consistent level of service that impacts the permit scheme, a further report on the consequences will be brought to the Board.

The Senior Management Group, based on the findings of the review, endorsed the approach outlined within this report at their April 2019 meeting.

1.4. Proposal for the Permit Renewal Process from October 2019

As the result of the full and robust review of the van and trailer permit scheme points toward a clear endorsement of the existing terms and conditions, it is proposed that no alterations be made and that rather than issuing the new tranche of permits that are due from October 2019, the life of the existing permits be extended and allow the natural churn (change of address, vehicle, etc) to gradually renew permits.

This approach will avoid the cost of the wholesale permit renewal scheduled for October 2019 – believed to be circa £26,000 plus the administrative burden that such a renewal would incur. It is expected that financial saving provided by continued reduced tonnages through the recycling sites will continue to outweigh the cost of administering the permit scheme.

Whilst the existing permits have an expiry date, contact and publicity will be targeted toward current permit holders to ensure that they are aware that they can continue to make use of their existing permit, ignoring the expiry date.

The design of the permits, provided the Board approve the recommendations within this report, will be amended to remove the expiry date and will be colour coded by year of issue, so that further reviews of the scheme will not be tied to set dates but will enable continued data & site management of applications.

2. Options considered and reasons for rejecting them

2.1. There were a few of the existing permit conditions that were considered for modification;

- Amending the application process
- The use of e-permits
- Reduction of the single axle trailer length tied to the acceptance of small multiple axle trailers

- 2.2.** Although we experienced a spike in customer contact at the commencement of the permit scheme in 2016, this has significantly reduced to a manageable level of circa 5 per week. Despite this it was appropriate to question existing permit holders whether the application process and subsequent contact with either the SWP or Partner authorities was adequate.

Of the 2,033 consultation respondents, 99.5% found the application process either easy or fairly easy, with only 11 suggesting any problems.

Therefore, it is not proposed to amend the permit application process at this time.

- 2.3.** The concept of using e-permits rather than the current printed format was considered to reduce administration and processing costs. Should the recommendation within this report have been to significantly alter the existing terms and conditions of the permit scheme and therefore require a refresh of the existing permits, this option may have been more attractive.

However, if approved, as the recommendation is to extend the life of the existing permits, allied to concerns raised by site managers with regards handling mobile devices on site and the result of the consultation question where 18.5% of current permit holders would not be able to produce their own permit or proof of holding a permit, this option was not considered appropriate at this time.

- 2.4.** As multiple axle trailer issues were the second most popular reason for residents to make formal contact with the SWP following implementation of the permit scheme, it was necessary to consider relaxing the current terms and conditions with this regard.

At the commencement of the permit scheme it was found that the terms and conditions changed the behaviour of trailer users in Somerset and a number confirmed that they had changed from owning a multiple axle to a single axle trailer as a result.

The reason for limiting access to single axle trailers remains, in that we control carry capacity, reduce residency time on site and thereby limit congestion. This combined with not wishing to further impact those residents that have altered their choice of trailer because of the existing permit scheme terms and conditions, leads to the conclusion that shortening the length acceptance criteria for single axle trailers or the inclusion of multiple axle trailers is not appropriate at this time.

3. Consultations undertaken

- 3.1.** As part of the review process a targeted consultation was issued to 9,500 registered permit holders on 27th March 2019 with a reply date of Midnight on 25th April 2019. Of the 9,500 supplied with the questionnaire, 2,033 (21.4%) replied, giving a 95% confidence level that the responses are representative of all permit holders.

Summary of the questions and the responses received;

- How easy did you find it to apply for your permit?
 - Easy – 1,679 (82.6%)
 - Fairly easy – 343 (16.9%)
 - Not easy – 11 (0.5%)

- We are considering potential options for when van and trailer permits are to be renewed. If an electronic copy of a permit was emailed to you, would you be able and willing to print your permit?
 - In colour – 1,196 (58.8%)
 - In black ink only – 461 (22.7%)
 - No – 376 (18.5%)

- What type(s) of permit do you have for Somerset recycling sites?
 - Van only – 1,000 (49.2%)
 - Trailer only – 905 (44.5%)
 - Both van and trailer – 128 (6.3%)

- What size is the trailer you use when going to the recycling site?
 - Less than 2 metres – 677 (65.5%)
 - 2 to 3 metres – 357 (34.5%)

- Thinking about your visits to Somerset recycling sites over the last year, which of the following statements most closely matches your use
 - I use a recycling site most weeks – 232 (11.4%)
 - I use a recycling site most months – 986 (48.5%)
 - I use a recycling site 3 or 4 times a year – 674 (33.2%)
 - I use a recycling site once or twice a year – 106 (5.2%)
 - I have not used a recycling site in the last year – 35 (1.7%)

- How often has your permit been checked by Somerset's recycling site staff?
 - Never – 559 (28.0%)
 - Sometimes – 1,071 (53.6%)
 - Often – 369 (18.4%)

- Do you tend to use the same recycling site?
 - Yes – 1,853 (92.7%)
 - No – 146 – (7.3%)

Other questions included which recycling site was generally used, a free text question asking for any other permit related comments and a number of standard equality questions (age, disability or long-term health condition, sex and minority ethnic grouping).

4. Background papers

- 4.1. SWB Recycling Centres Restricted Access Permit Report – 17th June 2016
 SWB Recycling Centres Restricted Access Permits Scheme Review Report – 30th June 2017