

ENVIRONMENT AND ECONOMY OVERVIEW AND SCRUTINY COMMITTEE

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| Date of Meeting | Tuesday, 15 November 2022 |
| Report Subject | Review of Vehicle Permit Criteria for Household Recycling Centres |
| Cabinet Member | Deputy Leader of the Council and Cabinet Member for Streetscene and Regional Transport Strategy |
| Report Author | Chief Officer, Streetscene and Transportation |
| Type of Report | Strategic |

EXECUTIVE SUMMARY

In September 2021, following two all-member seminars, a number of recommendations were presented to Cabinet on changes to be made to the current waste strategy in order for the Council to achieve 70% recycling by 2024-2025.

One recommendation within that report was to review the Household Recycling Centre (HRC) vehicle permit criteria in order to make it clearer to service users what types and sizes of vehicles should or should not be issued a permit and to ensure that traders did not take advantage of the system.

The recommendations were approved by Cabinet; however, a further report was requested to give further clarity on what the changes would be and how those changes would be implemented and communicated to service users. Subsequently, a further report was presented to Cabinet in January 2022 proposing a revised vehicle permit policy with details of how it would be implemented. The revised policy was approved and subsequently implemented in April 2022.

Post implementation and in response to a small number of complaints received from residents who were no longer permitted to access the HRCs with their vehicles, a commitment was given to undertake a review of the policy to ensure that that it met the original objectives set out and review whether the criteria needed further amendment.

This report provides an overview of the impact of the revised policy along with details of the review undertaken and proposals for amending the policy. Further considerations also are presented on the broader operations for HRCs with a view to introducing further service improvements and efficiencies.

RECOMMENDATIONS

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| 1 | That the Environment & Economy Overview & Scrutiny Committee supports the review undertaken and endorses the proposed amendments to the Vehicle Permit Policy for Household Recycling Centres. |
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| 2 | That the Environment & Economy Overview & Scrutiny Committee supports and endorses the inclusion of tyres as an additional waste stream in the HRC booking system in order to ensure waste minimisation and control. |
| 3 | That the Environment & Economy Overview & Scrutiny Committee supports and endorses the additional proposals to improve HRC operational controls and services. |

REPORT DETAILS

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| 1.00 | Explaining the background for the vehicle permit policy review and presenting further considerations to improve Household Recycling Centre operations |
| 1.01 | <p>In September 2021, following two all-member seminars, a number of recommendations were presented to Cabinet on changes to be made to the current waste strategy in order for the Council to achieve 70% recycling by 2024-2025. The Council's waste strategy is to re-use, recycle and compost as much recoverable waste as is practicable at our Household Recycling Centres (HRCs), which is in line with the Welsh Government Blueprint.</p> <p>One of the recommendations made was to revisit the current household recycling centre (HRC) vehicle permit scheme criteria. At the seminars, Members had expressed their concerns that the current vehicle permit criteria was not clear enough and could be left to interpretation, which could create confusion for service users.</p> <p>It had also been highlighted by our HRC staff that the existing permitting system unintentionally allowed traders and commercial businesses to exploit the system and bring in trade waste streams, which we are not permitted to accept. When questioned or challenged by our staff, some of these customers became abusive and violent leading to unpleasant working environments.</p> |
| 1.02 | <p>In a report presented to Cabinet, it was proposed that the vehicle permitting criteria should be reviewed in order to make it clearer to service users what types and sizes of vehicles should or should not be issued a permit and to ensure that traders did not take advantage of the system.</p> <p>It was also proposed that some flexibility be allowed for those vehicles that are registered to a business to be allowed access to deliver waste if it is clear that the waste has not been produced by that company or emanates from the activities of that business. For example, allow a vehicle registered to a plumber to dispose of household garden waste.</p> |
| 1.03 | <p>Following consultation with elected members and with site operational staff, back office support staff and management, a further report was presented to Cabinet in January 2022 providing comprehensive detail on what the revised vehicle permit policy would be and how it would be implemented. The revised policy was approved and subsequently implemented in April 2022.</p> <p>Prior to introducing the policy a communications plan was developed to ensure that all services users were made aware of the proposed changes and could make their application for a permit in a timely manner.</p> |

| | <p>The communications plan included, but was not limited to, updated website information, social media and Gov delivery campaigns, briefings to members, as well as posters and leaflets distributed at all HRC sites.</p> | | | | | | | | | | | | | | | | | | | | | | |
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| 1.04 | <p>Since March 2022 almost 2,000 applications for a vehicle permit have been received by the service. Of those, fewer than 300 applications have been refused due to the vehicle not complying with the new policy.</p> <p>Approximately 100 residents subsequently appealed the refusal; however only several of those appeals have been successful.</p> <p>The table below details the main reasons for permits being refused and some applicants were refused due to not satisfying multiple criteria: -</p> <table border="1" data-bbox="290 611 1396 1064"> <thead> <tr> <th>Reason for Permit Refusal</th> <th>Nos.</th> </tr> </thead> <tbody> <tr> <td>Vehicle Oversized (Height/LWB)</td> <td>69</td> </tr> <tr> <td>Documents provided did not match (different addresses)</td> <td>61</td> </tr> <tr> <td>Vehicle registered to a business</td> <td>45</td> </tr> <tr> <td>Vehicle is used for business/trade purposes</td> <td>46</td> </tr> <tr> <td>The trailer has caged sides / boxed trailer</td> <td>42</td> </tr> <tr> <td>The trailer is over 2m in length</td> <td>24</td> </tr> <tr> <td>The vehicle is sign written</td> <td>12</td> </tr> <tr> <td>The applicant is not a Flintshire resident</td> <td>1</td> </tr> <tr> <td>The documents provided were not current (over 12 months old)</td> <td>1</td> </tr> <tr> <td>The applicant's driving licence had expired*</td> <td>2</td> </tr> </tbody> </table> <p><i>*Note: whilst two applicants have been refused a permit due to expired driving licences, almost 20% of applications were initially received with an expired driving licence as evidence. The assessment team responded to the applicants to inform them, at which time they renewed and resubmitted the document.</i></p> | Reason for Permit Refusal | Nos. | Vehicle Oversized (Height/LWB) | 69 | Documents provided did not match (different addresses) | 61 | Vehicle registered to a business | 45 | Vehicle is used for business/trade purposes | 46 | The trailer has caged sides / boxed trailer | 42 | The trailer is over 2m in length | 24 | The vehicle is sign written | 12 | The applicant is not a Flintshire resident | 1 | The documents provided were not current (over 12 months old) | 1 | The applicant's driving licence had expired* | 2 |
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| 1.05 | <p>For those small number of applicants who were not eligible for a permit, it has created a negative response to the service with many local members and MPs/MSs contacting officers to request that the policy be relaxed.</p> <p>In response to this, the Leader of the Council and Deputy Leader of the Council and Cabinet Member for Streetscene and Regional Transport Strategy committed to undertake a review of the policy so that members could provide officers with their constituent's feedback or concerns. As a result, two all member workshops were held on 26th September 2022 in a hybrid format.</p> | | | | | | | | | | | | | | | | | | | | | | |
| 1.06 | <p>The workshops were well attended with approximately 30 members present over the two sessions. To enable an inclusive and comprehensive review, the workshops were attended by officers from across the service, such as HRC site staff, supervisors, enforcement officers and recycling, data and compliance officers.</p> <p>To ensure that maximum benefit was achieved at the workshops, the review was extended to include the wider HRC site operations with a view to introducing further service improvements and efficiencies, and maximising the opportunities for recycling. Details of the content of those workshops are shown in Appendix 1.</p> | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>The workshops were delivered in two parts; firstly a presentation provided by officers to give an overview of HRC operations, background legislation, policy and procedures, as well as an update on the impact of the vehicle permit policy following its implementation in April 2022.</p> <p>The second part allowed members to provide their feedback on the vehicle permit policy and experiences from residents, ask questions and offer suggestions for increasing recycling levels at the HRCs and improving operations. A copy of the slide deck presented to members at the workshop is detailed in Appendix 2.</p> <p>Additionally, members were invited to complete feedback forms following the workshops with any further comments that they may have wished to register.</p> |
| 1.07 | <p>Vehicle Permit Policy Review</p> <p>Following evaluation of the feedback provided at the workshops and subsequent feedback forms following conclusion of the session, the following proposals are presented for consideration: -</p> <p>Appendix 3 details the comments received by members, the associated considerations to be reviewed and, following appraisal of the advantages and disadvantages of those considerations, a proposed outcome for each comment.</p> <p>The proposed outcomes have been written into a revised policy document for consideration. The amendments and new clauses for inclusion in the policy have been highlighted in red text for ease of review - please see Appendix 4.</p> <p>If the proposed amendments to the vehicle permit policy were to be adopted, all the refused permit applications and appeals would be reassessed for eligibility against the revised criteria.</p> |
| 1.08 | <p>Booking System</p> <p>At the workshops, members acknowledged the benefits of the booking system; however, it was highlighted that the provision required improved publicity, as not all residents were aware of the process.</p> <p>As a result, it is proposed that another promotional campaign will be undertaken and improved signage at the HRC sites will be implemented to raise awareness.</p> <p>Due to the success of the booking system in ensuring that container availability is maintained, it is also proposed that tyres will be added to the waste streams requiring pre-booking. Appendix 5 details the proposed criteria for tyre disposal.</p> |
| 1.09 | <p>Charging for Disposal of Waste - Trader/Charities</p> <p>It is becoming more common for local authorities to charge for the disposal of bulky/heavy waste items received at HRC sites, such as wood or soil and rubble. Not all members supported this proposal, and others supported the provision of a chargeable service for the disposal of waste by businesses and trades. It is proposed that the options for charging should be explored further to establish the cost and benefit of providing such a service, whilst taking into account any legislative requirements. A further report will be presented to the Committee once this has taken place.</p> |

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| 1.10 | <p>Alternative Opening Hours Currently, all five HRCs open between the hours of 9am and 5pm seven days a week. It has been acknowledged that these opening times can be quite restrictive, especially for those residents who work during these hours.</p> <p>Members were generally supportive of extending opening times to allow for more opportunity for residents to attend site at more convenient times. To facilitate this there would be a requirement to adjust the site operatives working times from a 7.4-hour day, five day working pattern, to a 9.25 hour day, four day working pattern (over 7 days).</p> <p>Options are being explored to extend the opening times e.g. 8am-5.30pm; however, this will be subject to consultation with the trade unions and workforce, and the decision to move to a revised shift pattern and a longer working day will need to be reviewed in light of existing and future budgets and resources.</p> |
| 1.11 | <p>Bagging and Charging for Soil Conditioner Members commented that charging for soil conditioner produced from the composting of the Council's collected garden waste would only be possible if the quality of the product was of a high standard and if the charge did not eliminate competition in the market for local businesses.</p> |

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| 2.00 | RESOURCE IMPLICATIONS |
| 2.01 | ICT services support and assistance will be required to expand the back office booking system. |
| 2.02 | It is likely that an extension to the opening times of HRC sites will require additional resources and this will need to be assessed in light of available budgets and the medium term financial strategy. |

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| 3.00 | IMPACT ASSESSMENT AND RISK MANAGEMENT | |
| 3.01 | Ways of Working (Sustainable Development) Principles Impact | |
| | Long-term | The proposals will drive improvements to recycling performance and achieving a Circular Economy. |
| | Prevention | The proposals will help prevent the unauthorised disposal of waste and recyclable materials |
| | Integration | No impact |
| | Collaboration | No impact |
| | Involvement | Improved engagement with Flintshire business to ensure they understand their legislative responsibilities |

| Well-being Goals Impact | |
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| Prosperous Wales | Positive – improving reuse and recycling of recycling materials resulting in world leaders in recycling performance |
| Resilient Wales | Positive – Less demand for raw materials, promoting circular economy |
| Healthier Wales | Positive – reducing vehicle movements and emissions and allowing for the responsible management of controlled waste |
| More equal Wales | No impact |
| Cohesive Wales | No impact |
| Vibrant Wales | Positive – Promoting reuse and recycling of waste, and working towards carbon reduction |
| Globally responsible Wales | Reducing the reliance on the extraction of raw materials and destruction of natural habitats and ecosystems by the reprocessing of recyclable materials. |
| 3.02 | The vehicle permit scheme can be a very emotive topic and any changes can result in negative feedback from service users. A clear communications plan will be developed to control the distribution of any revisions to policy, including improved on site signage. |
| 3.03 | If revisions to policy are adopted, previously refused applications and appeals will be reassessed for eligibility against the new scheme criteria. |
| 3.04 | The level of abuse and threats of violence to HRC staff has been highlighted previously and raised as an ongoing concern for some time. The site staff will soon be presented with new body worn CCTV cameras to wear for recording and reporting any incidents. |
| 3.05 | Providing and retaining a clear and well-defined permit criteria will support the site staff in managing non-conforming waste arriving at the site. |
| 3.06 | Control of the vehicles utilising the sites will allow for better, easier access for Flintshire residents as large vehicles, which can take up to an hour to off-load their waste, will be prohibited. |
| 3.07 | The booking system will notify residents when there is container availability so that they do not bring their waste to site when containers are full and avoid wasted journeys. |
| 3.08 | The risk to the authority is reduced by eliminating trade vehicles from the sites, as the current Environmental Permit does not allow for trade waste to be accepted at HRCs. It also eliminates the risk of rogue traders, who should not be transporting commercial waste without a valid waste carriers licence, waste transfer note or waste permit. |

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| 4.00 | CONSULTATIONS REQUIRED/CARRIED OUT |
| 4.01 | Deputy Leader of the Council and Cabinet Member for Streetscene and Regional Transport Strategy |

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| 4.02 | Two all member seminars held on 26 September 2022 |
| 4.03 | Streetscene workforce and waste strategy team |
| 4.04 | Trade Unions |

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| 5.00 | APPENDICES |
| 5.01 | Appendix 1 – Workshop Agenda |
| 5.02 | Appendix 2 – Workshop Presentation |
| 5.03 | Appendix 3 – Members Comments and Policy Recommendations |
| 5.04 | Appendix 4 – vehicle Permit Policy Suggested Revisions |
| 5.05 | Appendix 5 – Booking Criteria for Tyres |

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| 6.00 | LIST OF ACCESSIBLE BACKGROUND DOCUMENTS |
| 6.01 | Target 70 A Review of Flintshire County Councils Waste Strategy.pdf |
| 6.02 | Household Recycling Centre Vehicle Permit Criteria |

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| 7.00 | CONTACT OFFICER DETAILS |
| 7.01 | Contact Officer: Ruth Tulley, Regulatory Services Manager Telephone: 01352 704796 E-mail: ruth.tulley@flintshire.gov.uk |

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| 8.00 | GLOSSARY OF TERMS |
| 8.01 | Household waste and non-household waste are defined in the Environmental Protection Act 1990 and the Controlled Waste (England and Wales) Regulations 2012. |