

Regulation of sites removing and refurbishing living quarters on coach built motorhomes.

Quick guide 432_18

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What's this document about?

It sets out guidance on the circumstances where we may agree a local enforcement position to allow removal of the living quarters from coach built motorhomes. The guidance relates to sites that do not hold an environmental permit for dismantling ELVs.

If Area consider a local enforcement position is appropriate this Quick Guide includes a template letter to send to customers that have contacted us to request the enforcement position.

Who does this apply to?

Environment officers, enforcement officers and others who are regulating ELV sites.

Contact for queries and feedback

- Tania Tucker - Senior Advisor (020302 56785)
- Please give [anonymous feedback](#) for this document.

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Background

Reason for this quick guide.

The leisure vehicle sector builds and supplies coach built motorhomes. They are not vehicle dismantlers or recyclers so do not hold environmental permits authorising them to depollute and dismantle ELVs.

Some coach built motorhomes are classified as category B salvage and the whole vehicle will be waste (ELVs). In some circumstances the living quarters may be substantially undamaged and can be removed, cleaned and repaired (if necessary) and re-used on another undamaged vehicle.

Currently these motorhome ELVs are being purchased and handled by ATFs who do not specialise in motorhomes and as such the living quarters are not in many cases being removed and re-used.

Specialist sites in the leisure vehicle sector cannot bid for or obtain category B salvage. This is because they are not an ATF and do not hold an environmental permit.

The sector has requested that we adopt an enforcement position that will allow them to receive category B motorhome salvage. This would be to remove the living quarters and then send the remaining vehicle to a permitted ATF for depollution and dismantling.

Enforcement Position.

Our position.

We recognise that there will be instances where category B salvage motorhomes could have living quarter units suitable for reconditioning and transplant onto another vehicle. In order to facilitate recovery and re-use of living quarter units we are of the view that a local enforcement position could be provided for this activity.

We will allow living quarter units from category B salvage motorhomes to be removed and repaired at sites that do not hold an environmental permit. This is provided the activity meets the conditions and limitations set out in the template letter at [Appendix 1](#) together with any additional conditions Area Officers deem necessary.

What do coach built motor homes look like

**Base vehicle
before the
living quarters
are added**



**Crash
damaged
coach built
motorhome
with living
quarter unit
that could be
removed and
reused**



Panel van with integral living quarters



Dismantling panel vans is not covered by this enforcement position so an environmental permit is required to dismantle them.

Procedure for operators getting agreement to operate under this enforcement position.

Steps to follow

Where a motorhome coachbuilder contacts either NCCC or their local team to enquire about this position. Follow the steps below.

| Step | Action |
|------|---|
| 1 | NCCC refer the enquirer to the local Area team. |
| 2 | Local Area team to consider whether there are any site specific reasons that prevent us taking an enforcement position. If the proposed activity by the enquirer can meet the conditions of the enforcement position issue a letter using the wording in Appendix 1 modified as appropriate . |
| 3 | Send a copy of the letter to tania.tucker@environment-agency.gov.uk so we can keep a record of how many enforcement positions we have nationally. |

Template letter wording.

Dear xxxxxxxxxxxx

Regulation of sites removing and refurbishing living quarters on coach built motorhome End of Life Vehicles (ELVs).

Thank you for your request to operate under a local enforcement position. Our enforcement position enables leisure vehicle coachbuilders to remove the living quarters only from motorhome ELVs without an environmental permit.

ELVs, including motorhomes, are waste and the depollution, dismantling and treatment of them is a waste treatment activity. This must be authorised by an environmental permit. A vehicle becomes an ELV when the owner has decided to scrap it or must scrap it. Examples of ELVs include;

- a vehicle that has been damaged and cannot be safely repaired and driven on the road (Category A or B insurance write off);
- Insurance write off categories S and N (formally C and D) that are going to be dismantled (broken) for spare parts; or
- any other vehicle purchased with the intention of scrapping/dismantling for spare parts.

However, we are prepared to provide you with a local enforcement position to allow you to remove and refurbish the living quarters of a coach built motorhome. This relates to (add in site details). This enforcement position is subject to you complying with the conditions and limitations below.

Limitations

- You are removing the living quarter units from coach built motorhomes only. This position **does not apply** to panel van type vehicles.
- The living quarters must be suitable to be re-used as motorhome living quarters on other vehicles. We accept that in some cases this may be after some refurbishment, which must not go beyond minor repairs.
- The only breaking or dismantling operation carried out is the removal of the living quarters from the vehicle.
- No more than **5 ELV** motorhomes or living quarters will be stored at the site at any one time.
- The motorhome is transported to and from the site by an upper tier registered waste carrier.
- Hazardous waste consignment notes are completed for movement from the producer/auction site to your site. A further consignment note is completed for the subsequent movement to the ATF. Hazardous waste records must be retained and made available to Environment Agency officers on request. More details can be found at:
<https://www.gov.uk/dispose-hazardous-waste/producers-and-holders>
- The ELV motorhome and living quarters must be stored on impermeable pavement with sealed drainage to prevent pollution.
- The ELV motorhome must not be stored for longer than **28 days** before the living quarters unit is removed and it is sent for depollution.
- You meet the Relevant Objectives of the Waste Framework Directive which are:
'ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
(i) without risk to water, air, soil, plants or animals;

- (ii) without causing a nuisance through noise or odours; and
- (iii) without adversely affecting the countryside or places of special interest.'

If you comply fully with the conditions and limitations above, we will allow you to carry out the activity specified without an environmental permit and We will not normally take enforcement action unless the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, please see our [Enforcement and Sanctions](#) statement.

We may review this position at any time and if we decide to withdraw it, we will write to you and consider any representations you make regarding a transitional period.