

GUIDANCE ON LOADING AND UNLOADING MEWPS ON THE PUBLIC HIGHWAY



1. INTRODUCTION

When a MEWP is delivered or collected from a site, loading and unloading (un/loading) on the public highway should be avoided, wherever reasonably practical. The main aim is to eliminate/minimise the risk to employees and members of the public by making arrangements for the loading/unloading or delivery vehicle to park away from the public highway and pavement areas.

It is the legal duty of all employers to conduct their undertakings in such a way as to ensure, so far as is reasonably practicable, that persons not in their employment who may be affected thereby are not exposed to risks to health or safety (HSWA 1974).

Thus, the customer/contractor is responsible for providing a designated safe area for the un/loading activity to take place. The designated area should be of sufficient size, well-lit, on firm and level ground, be segregated from other work activities, free of traffic, pedestrians and members of the public and clear of overhead/underground hazards. To achieve this, consider changing the layout of the yard or parking area to allow un/loading within the normal workplace site. Alternatively, request for smaller delivery vehicles when placing the original instruction/confirmation to deliver or collect any equipment.

For construction operations, consider the access of delivery vehicles at the design stage and incorporate appropriate rules into the construction phase safety plan. If the use of the highway is unavoidable, then local authorities may impose conditions on the practice and enforce these in the event of contravention.



This document is written for application in the UK, within the UK legislative jurisdiction, but the safety principles may be beneficial to other countries in helping to reduce accidents.

2. SCOPE

This guidance identifies measures that may be implemented by rental companies, their customers, contractors, and transport companies to reduce the risk of incident or injury should it be necessary to un/load MEWPs on the public highway.

3. INITIAL RISK ASSESSMENT AND COMMUNICATION

Where, after suitable and sufficient risk assessment, the customer/contractor identifies the need to un/load a MEWP on a public highway, the customer/contractor is required to provide a safe place of work and manage the un/load environment. This should be done by identifying and documenting the safe system of work to be employed for un/loading operations and making it clear to all involved, including employers of visiting transport companies and the drivers themselves. At no time during the un/load process shall any part of the MEWP be allowed to extend or slew into a line of traffic.

There are allowances made through local orders in road traffic law for the un/loading of goods on the highway, with respect to parking or no waiting restrictions. In some circumstances, the stopping of the vehicle on the roadside will not give rise to action by the police. However, in other cases, the stopped vehicle may be deemed to be an obstruction or contravene parking permissions. Where, due to the traffic flow and applicable speed limits, the risk assessment identifies that traffic management precautions need to be deployed before un/load commences, then that should be undertaken.

Risks arising from un/loading on the public highway may be reduced by one or a combination of the following (this is not an exhaustive list):

- Schedule deliveries for a quiet time, avoid peak traffic periods (may be limited by local authority planning restrictions on times of delivery and complaints from neighbours, especially if reversing alarms are used). Particular problems may arise by un/loading around and during school arrival and departure times.
- Identify where the delivery vehicle will park on the highway, considering the proximity of the site entrance to bus routes and narrow roads. Where practical and safe to do so, reserve the parking space by placing marked cones on the kerb side – allowing an enlarged length of kerb to incorporate a suitable 'run-off' distance at the rear of the transport vehicle. The run-off distance refers to having sufficient space at the rear of the vehicle to allow for the MEWP to clear the area.
- Consider which way the lorry should face in order to increase vehicle visibility (normally facing the traffic). Consider that the driver may have to stand and operate ramp lowering levers on the side of the vehicle. Avoid movements involving the MEWP or delivery persons crossing the traffic flow.
- Where needed, provide a competent and authorised supervisor/signaller wearing high visibility clothing positioned in a safe place using agreed hand signals. Signallers should give priority to the passage of pedestrians and other road users. Signallers have no authority to stop traffic on the highway.
- Where cones or barriers need to be used and placed on the public highway, then the duty holder should discuss their use with the police and local/highway authority. Pedestrians should not be directed into the road.
- Provide adequate lighting in hours of darkness.
- Take any other precautions applicable to the specific location.

Having considered the above, the customer/contractor receiving the transport vehicle should confirm the need to un/load on the public highway with the rental company as soon as reasonably possible, preferably when confirming delivery and collection details as part of the machine ordering process. This will allow agreed un/loading rules/plans to be incorporated into delivery/order documents carried by the driver and the customer/contractor to identify a competent representative who will manage the un/loading operation.

4. TRAINING AND COMPETENCE

Only appropriately trained and competent operators, supervisors, managers or other competent persons should be engaged in the assessment of any loading or unloading upon the public highway.

It is recommended that drivers undertake recognised load and unload training such as the IPAF Load and Unload course. Contractors, managers and supervisors should undertake suitable training such as the IPAF MEWPs for Managers course. Any of the above personnel should have the power to refuse or stop the un/load operation on safety grounds.

5. VEHICLE AND EQUIPMENT

Consider both the site(s), which might have access and egress restrictions as well as the machine(s) to be unloaded/loaded. The choice of vehicle depends on the suitability of the vehicle to safely transport the specific units, as well as the site access and egress requirements. For example, the machine(s) to be transported could dictate the need for a full width ramp instead of split or moveable ramps, a winch (consider load/unload sequence to ensure the winch is accessible for machines that require winch assistance), a low vehicle/trailer gradient, low profile ramps for machines with low ground clearance, sufficient anchor chains/straps, warning beacons (especially where rear lights are obscured) etc.

The vehicle must be conspicuous: high visibility chevron markings are strongly recommended in England and Northern Ireland, and compulsory in Scotland and Wales. Any vehicle used for loading and unloading must have one or more amber warning beacons such that at least one beacon can be seen from any direction, at a sufficient distance to allow approaching vehicles to stop safely.

Consider also the need for additional equipment to provide a safe un/load area with equipment such as: signs, vehicle work lights, sufficient cones for the vehicle. Though it is unlikely that the un/load operation on the public highway will fall within the definition of street or road works, the standards set out in "Safety at Street Works and Road Works: A Code of Practice" for signs, separation distances, cones etc. provide a very good guide for a safe system of work.

6. PERSONAL PROTECTIVE EQUIPMENT (PPE)

It is important that appropriate high visibility PPE is available, worn throughout the load/unload process, and put on before leaving the transport vehicle at the start of the un/load process. Other PPE may be needed depending on site-specific safety requirements and may include:

- Harness and lanyard
- Personal eye protection
- Hearing protection
- Protective gloves
- Industrial safety helmets
- High visibility warning clothing (The colour of the clothing should normally be fluorescent yellow or fluorescent orange-red. There may be extra PPE requirements on motorways and other high-speed roads. Normally the high visibility jackets or coveralls should have full length sleeves and high visibility trousers. The contractor should communicate any additional site PPE requirements – See section 1.
- Safety footwear - with ankle support

Remember: Ensure the vehicle has ALL necessary PPE equipment prior to departure; this is often carried as part of your vehicle-specific equipment.

7. ARRIVAL AT SITE

Upon approaching the site, turn on your roof-mounted amber beacon(s). Upon arriving at the site, the driver should contact the person who is in charge of unloading on the site (where applicable).

If you cannot park on site or off the road, park facing oncoming traffic wherever practical and make sure the vehicle can be seen clearly by other drivers. Do not obstruct a footway or cycle route when parking off the road, and respect access to premises and driveways. Pedestrian access to all properties and premises should be maintained at all times.

It is strongly recommended that you phone ahead to advise of specific arrival times (especially around airports and railway stations). That way you may not need to leave your vehicle to find the person in charge.

8. CONDUCTING A DYNAMIC RISK ASSESSMENT

Upon arriving at the site and before starting any un/load activities, the driver will, considering the size and type of load, conduct a visual assessment of the designated area to identify any hazards, which may impose significant risk during the un/load operation. Drivers need to be appropriately trained to be able to undertake such assessments. Where relevant hazards are identified, these should be addressed jointly with a representative of the customer/contractor and/or other person involved in the unloading activity before starting work.

Such a dynamic risk assessment should consider but not be limited to:

- Other traffic
- Pedestrians
- Speed of traffic and speed restrictions on the road
- Road layout, junctions; consider bends, crests of hills, trees and bushes, parked vehicles
- Ground conditions such as: inspection covers – drains and services
- Road camber – uneven or sloping ground
- Railway level crossings, tramways, bus, cycle routes or pedestrian walkways
- Any overhead cables/obstructions
- Any shops, business premises (including access and egress) or other works nearby
- Street or site light levels
- Weather and site/road surface conditions
- Delivery time restrictions and busy periods e.g. rush hour
- Avoid level crossing, tram crossing, pedestrian, cycle (toucan) or equestrian crossing and parking restrictions
- Work and secure from a safe location (kerbside whenever practical)

CAUTION: Most MEWPs requiring transport to site are not built for, or taxed for use, on public highways. Therefore it is important to minimise the distance driven from point of unload to the site and consider in the risk assessment if an escort vehicle and/or police and highway authority permissions are needed.

IF THE SITUATION IS NOT COVERED BY THE METHODS SHOWN, CONTACT THE CONTRACTOR/SITE SUPERVISOR.

9. THE LOAD / UNLOAD PROCESS

At no time during the un/load process shall any part of the MEWP be allowed to extend or slew into a line of traffic.

Where un/loading on the public highway falls into the category of 'short-duration MEWP un/load work (up to approximately 30 mins) involving the use of a single transport vehicle', the un/load activity may omit the use of cones and a traffic barrier (lane closed sign), provided that safe working methods are used – e.g. carrying out the work when there is good visibility and during periods of low risk. Un/load activity must be continuous from start to finish in order to be classified as short-duration MEWP un/loading. It is critical that this only happens when the risk assessment is clear that it is safe to do so.

Basic minimum requirements are:

- The vehicle must be clearly visible to approaching vehicles
- The vehicle must have one or more roof-mounted beacons operating
- Use hazard warning lights
- Do not obstruct active bus lanes or emergency vehicle access

Avoid the following situations. Where this is not possible, additional static signs are required:

- The works vehicle cannot be seen clearly because of hills, bends in the road, etc.
- Near a junction
- Stationary traffic may tail back
- There is not enough space for two-way traffic to pass the works vehicle
- The task is not of a short duration

Note: This above list provides relevant examples but is not exhaustive.

It is recommended that the contractor/site supervisor provides assistance whenever the additional points above apply. Un/load operations should not be carried out on dual carriageways to which the national speed limit applies, unless additional precautions are taken.

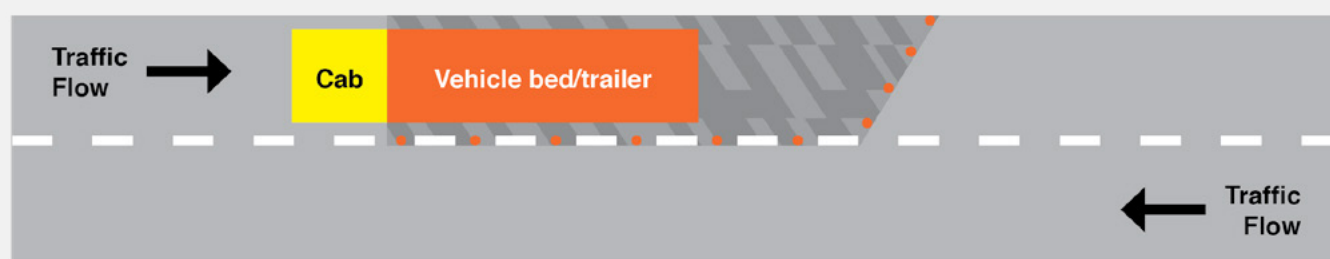
Once the MEWP is safely off the public highway, the un/load process should be completed by stowing and securing the vehicle ramps. Whenever possible, this should be completed before machine handover.

10. EXAMPLE OF HIGH RISK OR LONG DURATION UN/LOAD WORK:

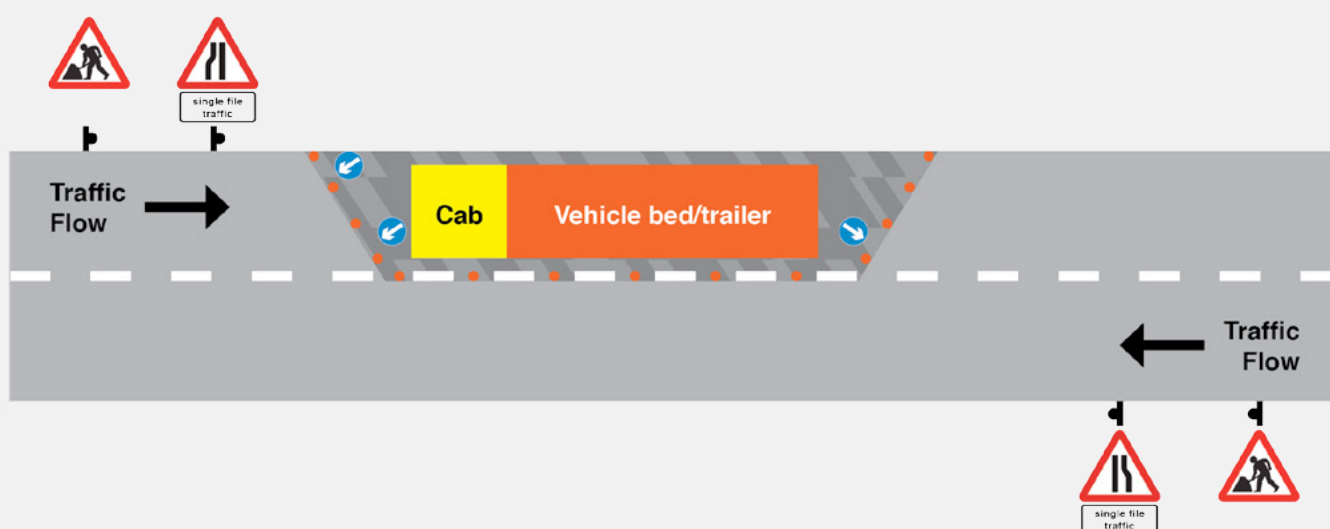
With reference to the risk in section 3, the safe load and unload area dimensions must be determined before starting to set the signs out.

The layout, size and distance for any advance signs depend upon road type, speed limit, visibility on the approach to the proposed works site, e.g. on a bend, on a dip in the road, or on the brow of a hill. The resulting safe working area could vary from example 1 to example 2.

Example 1:



Example 2:



Where cones or signs are used, the load and unload work must not start until you have a safe segregated load and unload working area.

SHORT DELAYS ON FOOTWAYS: Sometimes it is not always possible to provide an alternative footway. A temporary obstruction is permissible where ALL the following apply:

- No alternative footway is available or can be provided.
- Footway is not closed for longer than necessary and no longer than 15 mins in 1 hr.
- Operators are available at all times to direct pedestrians past the works.
- All overhead works cease at this time.
- Temporary footway closure notice is provided.
- The highway authority has been notified and has agreed to the use of this measure.

11. DEPARTURE FROM SITE

Before leaving the site, the driver needs to check the cleanliness and security of the load and vehicle, taking into account vehicle and pedestrian movements on the public highway to ensure this is done without due risk.

Check machines to ensure that hatches or canopies are secured to prevent opening during transit or if additional securing is required. Ensure that equipment used to segregate a safe load and unload area is removed in such a way that you maximise your visibility to other road users as long as possible.

After leaving the load and unload area and having safely re-joined the carriageway, turn off your roof-mounted amber beacon(s) unless required for an abnormal load.

REFERENCES

UK Department for Transport (2015). Operational Guidance to Local Authorities: Parking Policy and Enforcement. www.gov.uk/government/publications/operational-guidance-to-local-authorities-parking-policy-and-enforcement

UK Department for Transport (2013). Safety at Street Works and Road Works: A Code of Practice. www.gov.uk/government/publications/safety-at-street-works-and-road-works

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