

## Waste and Recycling Committee

Date: 13<sup>th</sup> July 2023

Subject: Review of the Household Waste Recycling Centre Access Policy and Van Permit System

Report of: Paul Morgan – Head of Commercial Services, GMCA Waste and Resources Team

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### Purpose Of Report

This report provides the findings of the review of the Household Waste Recycling Centre Access Policy and Van Permit System and seeks approval for improvements to the Policy and Scheme.

### Recommendations:

The Waste and Recycling Committee is requested to:

1. Note the findings of the reviews and the positive contributions the Household Waste Recycling Centre Access Policy and Van Permit System have made to the operation of the service; and
2. To approve the revisions to the HWRC Access Policy and Van Permit Scheme terms and conditions as set out in Appendix 3.

### Contact Officers

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# Equalities Impact, Carbon and Sustainability Assessment:

## Recommendation - Key points for decision-makers

*It is recommended that the review Access Policy and changes to the rules for the HWRC van permit system are approved. The revisions will result in a reduction in the largest vehicles entering the HWRCs. The size of these vehicles conflicts with each site's design parameters and can also deliver significant quantities of waste compared to standard cars. As a result there will be less waste to manage and fewer vehicles on site.*

## Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion		No impact.
Health		No impact.
Resilience and Adaptation		No impact.
Housing		No impact.
Economy		No impact.
Mobility and Connectivity		No impact.
Carbon, Nature and Environment	G	
Consumption and Production	G	
Contribution to achieving the GM Carbon Neutral 2038 target		Based on the experience of the HWRC van permit system to date the proposal will result in a reduction of visits to the HWRC network and the amount of waste delivered.

<b>G</b>	Positive impacts overall, whether long or short term.	<b>A</b>	Mix of positive and negative impacts. Trade-offs to consider.	<b>R</b>	Mostly negative, with at least one positive aspect. Trade-offs to consider.	<b>RR</b>	Negative impacts overall.
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Carbon Assessment		
Overall Score		
Buildings	Result	Justification/Mitigation
New Build residential	N/A	
Residential building(s) renovation/maintenance	N/A	
New build non-residential (including public) buildings	N/A	
Transport		
Active travel and public transport	N/A	
Roads, Parking and Vehicle Access	N/A	
Access to amenities	N/A	
Vehicle procurement	N/A	
Land Use		
Land use	N/A	
No associated carbon impacts expected.	High standard in terms of practice and awareness on carbon.	Mostly best practice with a good level of awareness on carbon.
		Partially meets best practice/ awareness, significant room to improve.
		Not best practice and/ or insufficient awareness of carbon impacts.

## Risk Management

The change proposed is minor and only impacts a very small number of Van Permit Holders. There may be some media coverage of the changes but these will be proactively managed.

## Legal Considerations

The scope of the Van Permit scheme is defined by the Authority. Owners of vehicle types excluded by the changes may seek to challenge the decision but, based on several rulings by the Local Government Ombudsman for other authorities, there are no grounds for a successful challenge.

## Financial Consequences – Revenue

There will be a small cost in communicating any changes to the Permit System which can be accommodated within existing budgets. There are no long-term negative revenue consequences and the changes could result in a reduction in costs as less waste is delivered to the Household Waste Recycling Centres.

## Financial Consequences – Capital

There are no capital consequences to the changes.

## **Number of attachments to the report: 3**

Appendix 1 Consolidated List of Proposed Changes

Appendix 2 Examples of Popular Vans and their Lengths

Appendix 3 Proposed amended Van Permit Scheme Terms and Conditions

## **Comments/recommendations from Overview & Scrutiny Committee**

Not applicable.

## **Background Papers**

- Household Waste Recycling Centre Access Policy, GMCA 27 September 2019
- HWRC Access Policy Report, Waste and Recycling Committee 22 July 2020

## **Tracking/ Process**

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

No

## **Exemption from call in**

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

**Please state the reason the report is exempt from call-in**

## **GM Transport Committee**

N/A

## **Overview and Scrutiny Committee**

N/A

# 1. Introduction/Background

In September 2019, GMCA adopted the Household Waste Recycling Centre Access Policy. This Policy sought to put in place controls on access to and the number of visits users made to the Household Waste Recycling Centres (HWRCs) as a means of controlling illegal use of the sites by traders seeking to dispose of commercial waste free of charge. The Policy was later augmented by the introduction of the Van Permit Scheme.

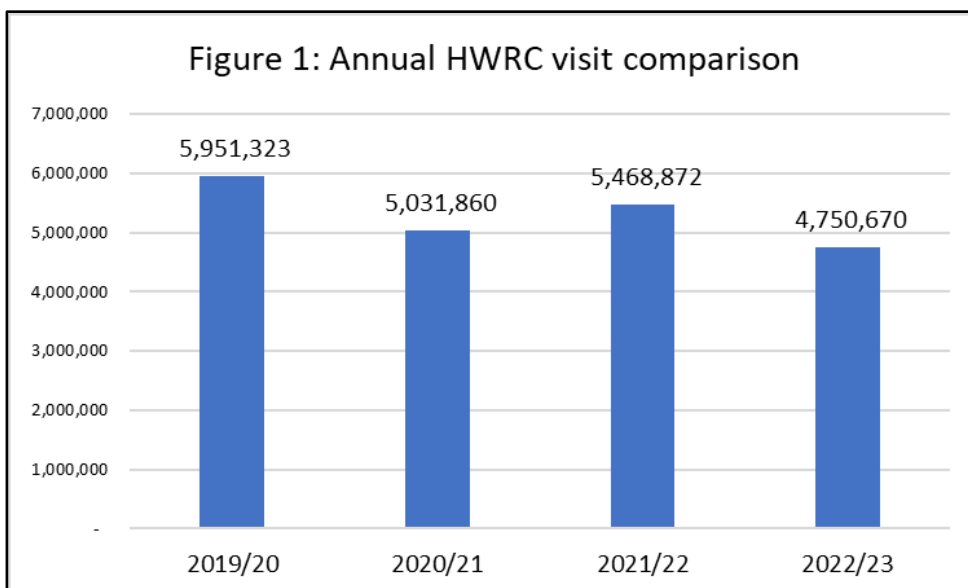
This report reviews the Access Policy and the Van Permit Scheme to assess their effectiveness at controlling access by those who may be abusing the HWRCs and identifies whether any improvements are required in response to an analysis of experiences and data.

## 2. HWRC Usage

### 2.1 2022/23 Site Visits Analysis

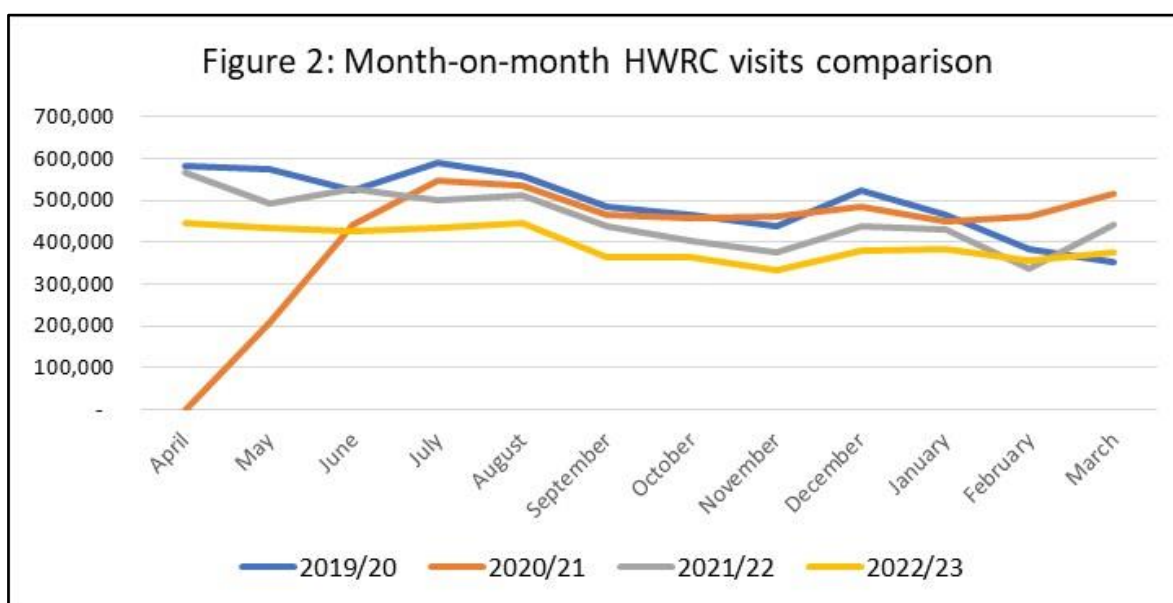
Through the use of automatic number plate recognition (ANPR) technology Suez is able to report the number of vehicle visits that are made to the HWRC network. In 2022/23 the total number of vehicle visits made was 4,750,670.

Figure 1 below provides the comparison of visits across the previous four years (noting that 2020/21 was the period when the network was impacted by the closures and restricted opening during the pandemic).



As can be seen between 2019/20 and 2022/23 there has been a significant reduction in visits by around 1.2 million with a corresponding reduction in waste delivered.

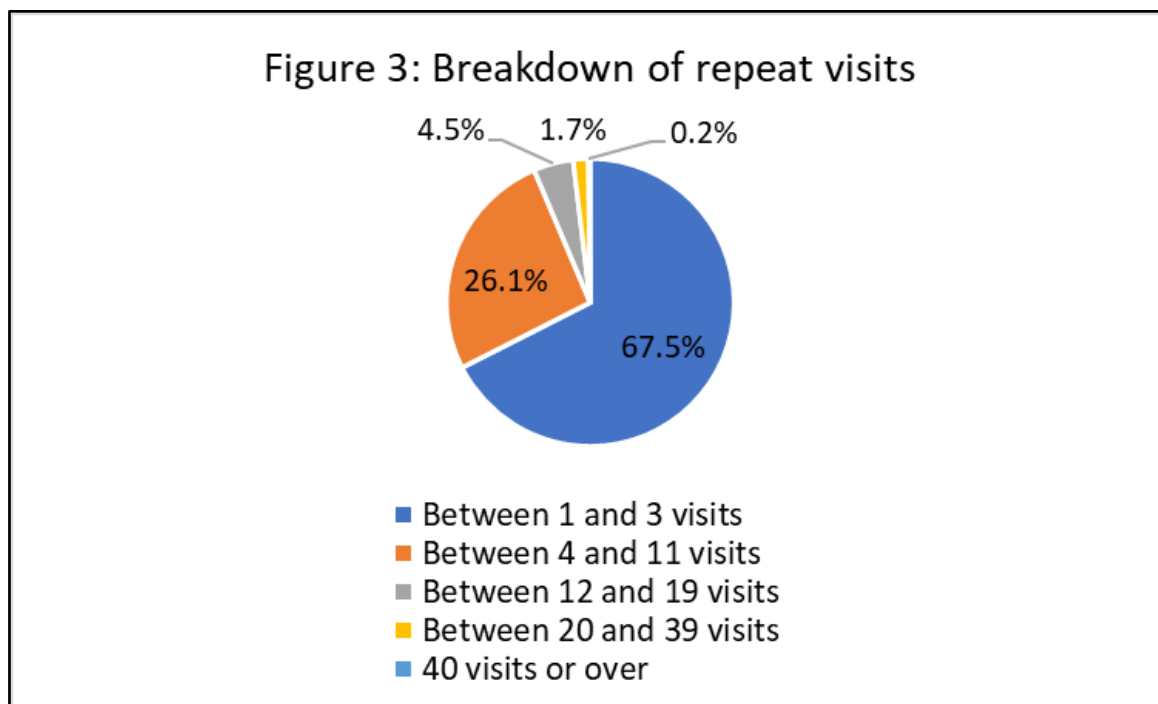
As Figure 2 shows there is a pattern to site visits on a monthly basis with visits in 2022/23 mirroring the pattern from previous years. The pattern reflects holiday periods when visits reduce and periods of high generation such as over the Christmas holidays.



The ANPR analysis also provides data on the frequency of usage of individual vehicle registrations. This has been an invaluable tool in helping both Suez and GMCA enforce the HWRC Access Policy and identify potential traders who may have been using the HWRCs illegally. The highlights of the ANPR analysis are:

- 705 individual registrations have visited the HWRCs more than 53 times in the year – their average number of visits is 66;
- 31 individual registrations visited more than 100 times but a significant number are very regular shop visitors. For example, the highest number of visits by a single registration (167) only used Boysnope Wharf and Woodhouse Lane where two of the Renew Shops are located;
- The first 'non-shop' visitor had 136 visits (next 132 visits) and usually after 5pm; and

- There are a number of householders who do visit the sites on an almost daily basis bringing very small amounts of waste in; Figure 3 below provides the analysis of visit counts. This shows that 98.1% of individual registrations visited 18 or fewer terms in 2022/23 with the average number of visits being six per annum. This average level of visits demonstrates that the limit of 52 for a car and 18 for a van are more than sufficient for the vast majority of site users.



A number of considerations arise from the analysis:

- The three sites with Renew Shops are receiving visitors whose sole purpose is to visit the Shops. This is positive showing the value of the Shops but does skew the data somewhat. Where identified this is taken into account when assessing the usage patterns of regular visitors and dedicated trips are deducted from visit allocations;
- Where high visit numbers are identified drivers are challenged. Where the Meet and Greet Operative considers the waste to be genuine household waste then no further action is taken but where the waste is judged to be non-household waste the Operative can refuse entry. Timings of visits (such as the one above regularly after 5pm) are indicators that the waste may be trade waste; and
- Visitors coming frequently with relatively small amounts of waste may indicate waste storage issues at home (and we advise those residents to get in touch with their councils) or that the visit performs a social contact function. In neither instance are householders penalised for frequent visits.

As stated above, the overall analysis indicates that the vast majority of householders visiting in cars are on average at frequencies significantly below the 52 visits per year allocation set in the HWRC Access Policy.

### **3. Review of the HWRC Access Policy**

#### **3.1 Introduction**

The HWRC Access Policy was approved in September 2019 and came into effect in February 2020. The justification for the introduction of the Policy was to reduce (and eliminate if possible) the number of visits made to the GMCA's HWRC network by traders. It has been a concern that for many years traders were delivering their waste at a cost to Greater Manchester's council tax payers when they were not entitled to as well as adding pressure to busy sites.

The purpose of the review was to identify whether any 'loopholes' had developed that resulted in continued misuse of sites and to assess whether data and experience could identify improvements to the systems.

Waste generated commercially (whether by, for example, builders, plumbers, landlords, commercial gardeners or retail premises) cannot be accepted at the HWRCs. Such waste should be taken to permitted waste facilities where the necessary waste transfer documentation can be managed and the appropriate disposal fee paid.

Changes to the Access Policy will be applied operationally through the update to the Van Permit Scheme discussed in section 4 below.

#### **3.2 The HWRC Access Restrictions Introduced**

In brief, the Policy introduced, across all HWRCs, visit thresholds which were to be monitored (using ANPR) to seek to identify traders abusing the network. These thresholds were:

- Cars and cars with single axle trailers – threshold level of 52 visits per year;



- Cars with twin axle trailers and all vans and pick up trucks to be considered as trigger vehicles and subject to enhanced checks; and
- Trigger vehicle visit thresholds:
  - Up to 3.5t gross vehicle weight – 18 visits per year
  - Above 3.5t gross vehicle weight – 12 visits per year
  - Car plus double axle trailer – 18 visits per year
  - All trigger vehicles limited to no more than 5 bags of rubble per visit.

To support the Policy a number of other measures were put in place:

- Parking restrictions introduced on the public highway in the vicinity of HWRC sites to reduce the ability for traders to park outside and walk waste in;
- Rebranding of the sites to give greater emphasis to recycling and reuse;
- The above measures were accompanied by awareness raising amongst commercial companies of their duty of care obligations for waste disposal and alternate available disposal facilities using the Environment Agency website and Dsposal website (<https://dsposal.uk>);
- Enhanced security measures for staff including the use of body cams and CCTV along with additional training on customer care and managing aggressive behaviour; and
- Development of an enforcement approach with Districts for repeat offenders and for any fly tipping activity in the vicinity of the HWRC sites.

In addition, the site Meet and Greet Operatives would ask about addresses to ensure waste came from homes within the nine council areas.

Subsequently, the introduction of an electronic permit system to manage van entries to the HWRCs was introduced.

### **3.3 Impact of the HWRC Access Policy**

Linking the implementation of the Policy and actions directly to visits to HWRCs (and then to the quantities of waste delivered to the sites) is difficult as a number of external factors can also impact waste generation (for example, the performance of the wider

economy, the change in composition of waste and the 'lightweighting' of materials and the weather).

Looking at the visitor data presented in section 2 above there has been a significant reduction in the number of visits annually. Looking at the monthly trend data the rate of reduction of visits could have increased from February 2020 perhaps linked to the access restrictions but a direct causal link cannot be made.

### **3.4 Findings of the Review and Suggested Revisions**

GMCA and Suez has been closely monitoring the Access Policy since it was introduced. The purpose of this was to assess whether the controls put in place were appropriate and proportional and to understand how the groups we were seeking to exclude (the traders) responded. It also provided the opportunity to look closely how certain vehicle types impacted on the operation of sites and their use by other visitors.

Three aspects of the Access Policy were reviewed alongside data and information gathered since its implementation:

- The types of vehicles that would be allowed to access the HWRC network (and covered by the Van Permit Scheme);
- The thresholds for the number of visits per annum; and
- Limits on rubble inputs (five bags).

### **3.5 Vehicle Types and Visit Threshold Levels**

The following table summarises the vehicles that the Policy covered and the number of threshold visits allocated.

<b>Vehicle type</b>	<b>Visit threshold levels</b>
Cars and cars with single axle trailers	52 visits per year
Cars with twin axle trailers	18 visits per year

Vehicles up to 3.5 tonne gross vehicle weight	18 visits per year
Vehicles above 3.5 tonne gross vehicle weight	12 visits per year

The proposed changes to vehicle types allowed on site are summarised in the following table.

<b>Change</b>	<b>Rationale</b>
Vehicles designed primarily to provide a service or to carry goods, not people (e.g. flat bed trucks, caged tippers, tail lift vehicles, car recovery and transportation vehicles)	These vehicles are commercial in nature and larger in size and can carry significant quantities of waste. Also, may be of a length whereby they cannot negotiate the HWRC road network due to tight bends.
Limiting vehicle length to a maximum of 5.3 metres  Appendix 2 provides a list of vans and their lengths showing that the majority of short and medium wheel base vans will still be able to access sites.	HWRCs designs are based on the average user vehicle being 4.8 metres in length and a car-double axle trailer combination being around 11.5 metres (but (crucially) articulated). Research shows the majority of common standard van lengths are up to 5.3 metres and these can manoeuvre on site safely.
Limiting vehicles to a gross vehicle weight of 3.5 tonnes	Vehicle with a GVW exceeding 3.5 tonnes can carry several tonnes of waste – quantities that exceed what one might consider reasonable for home improvement work.
A trailer (whether single or double axle) that was not purposely designed and built as a goods carrying trailer	We have seen a number of examples of trailers fashioned from e.g. cut-down caravans or the bare chassis of other vehicles. These are not designed for the

	carriage of goods/waste and we do not consider them safe for use on a HWRC.
Agricultural machinery and vehicles (including horse boxes)	Both in terms of size and carrying capacity these vehicles are unsuitable for the HWRC network.

As discussed in section 2 above, data from the number plate recognition system has been analysed. This showed that over 95% of registrations visited 18 or fewer times in 2022/23 indicating that the current thresholds set for cars and van-type vehicles are more than adequate for the majority of site users. Therefore, no changes to thresholds are proposed and those for the van permit scheme (as discuss in section 4 below) will be unchanged.

### **3.6 Rubble Limits**

The current limit for the delivery of rubble is five bags per visit.

In 2022 Defra published a technical consultation on preventing charges to householders for the disposal of ‘DIY’ waste at HWRCs. This contained proposals to clarify the definition of ‘DIY’ waste and also to effectively limit the ‘free’ deposit of this waste type at HWRCs to 300 litres per week – quantities after that could be charged for.

Currently, the GMCA’s rubble limit could equate to 300 litres per visit so allows for considerably more waste than the Government considers should be delivered at no charge.

There has been no indication from Defra when it will provide the results and its response to this consultation so it is proposed not to change the current limit until such time as the Government’s position is clearer.

A consolidated list of the proposed changes to the Policy can be found in Appendix 1.

## **4. Review of the HWRC Van Permit System**

### **4.1 Introduction**

To further strengthen the controls on vans visiting the sites an electronic permit system was introduced that went live from December 2021. The owners of a qualifying vehicle (see below) were required to apply for a permit. The process required applicants to provide evidence of residence within one of the nine Greater Manchester districts as well as upload a copy of the V5C document for the vehicle to demonstrate that it was registered to the permit address. No address could hold more than one 'live' permit for a registration and no one registration could be registered to multiple addresses.

Qualifying vehicles were in line with those identified in the original HWRC Access Policy and remain unchanged until the approval of the changes proposed here.

### **4.2 The Impact of the Permit Scheme**

As you would expect the Scheme received significant numbers of applications (the data is presented below). The proportion of applications refused was quite high to start with as the system identified:

- people who were resident outside of one of the nine districts using the sites when they were not entitled to – in these cases permits were refused;
- vans registered to businesses but used by employees for personal purposes – in these cases permits were provided if written authority from the registered keeper was provided; and
- obvious traders (permits refused).

There have also been instances where vans are borrowed or family/friends from outside of Greater Manchester have helped residents move household waste – these are dealt with on a case-by-case basis.

To the end of April 2023 there had been 46,970 permit applications of which 59% (27,518) were approved. Those refused may have subsequently been approved on the submission of further information.

A review of permits has identified that around 10% are 'dormant' in that they have been approved but never used (or may have been short term permits for hire vehicles). Recently, those account holders have been contacted to inform them that unless confirmed otherwise dormant accounts will be deleted to tidy the database up.

As discussed, identifying a direct causal link between the permit scheme and reductions in overall visits and tonnages delivered is difficult but it has to be one of the factors at play when reviewing the overall reduction in visits described in section 2 above.

On the frontline of operations, Suez site staff are positive about the scheme and believe it has enabled them to do a better job and has removed one source of conflict at site entrances. That is not to say conflicts between those who wish to evade their legal responsibilities through the use of the HWRCs have been eliminated. From time to time some site users have actively objected to the scheme and where this has spilled over into aggression Suez has reported these incidents to the police.

A further consequence of the scheme is the move, in a small number of cases, to adapting large/estate cars so that they can effectively have the same carrying capacity as a van. Where these are identified the drivers are challenged and can be banned if they fail to adequately demonstrate the source of the waste is from their household.

A final positive benefit is that, as reported previously, we have been able to redirect 'high sided' vans from the transfer loading networks back to the HWRCs. The permit scheme enabled us to remove the height barriers at the HWRCs as the high sided vehicles fall within the permit scope so can be controlled that way. This has meant that this waste can now be better recycled and drivers do not need the comprehensive set of personal protective equipment (PPE) they needed previously.

### 4.3 Reviewing the Van Permit Scheme

It is clear that the Van Permit Scheme has significantly reduced the number of traders abusing the GMCA's HWRC network. This will undoubtedly have reduced the quantity of waste the Authority and Suez manage, made the sites less busy for genuine users and helped operatives monitor waste inputs more closely. However, as the scheme has progressed we have identified some improvements that will strengthen the scheme's terms and conditions. The full proposed revised terms and conditions can be found at Appendix 3 but the principal change relates to the vehicles that will not be given permits.

#### 1 Vehicles Accepted and Prohibited

The proposed revised scheme terms and conditions (which permit applicants have to actively acknowledge as part of their application) explicitly define the types of vehicles which will be excluded and not be given a permit. The following table states the exclusions and the reason for them.

Therefore the 'applicable vehicles' for the purposes of this Permit Scheme include:

- Car-derived vans e.g. a vehicle built on a car chassis but with e.g. no rear seat, panel sides or side facing windows;
- Open backed pick ups;
- Short and medium wheel base vans 5.3m or less in length, and
- Double axle trailers manufactured for the purpose of carrying goods (including waste) – purpose built single axle trailers do not require a permit;
- For any vehicles:
  - length must be less than 5.3m;
  - gross weight must be less than 3.5t.

These changes are a strengthening of the scheme improving safety on site and further restricting the opportunity for traders to deliver waste.

#### 2 Other Proposed Changes

Elsewhere, the terms and conditions have been revised to provide clarity and remove an ambiguity. For example:

- A table has been provided to give worked examples of how permit allocations will be reduced in certain circumstances. For example, if a van with a double axle trailer both carrying waste arrives on site the allocation reduces by two permits. However, if the Meet and Greet Operative sees the van is empty, only one permit will be deducted (requiring a manual correction);
- Wording relating to the hire of vans and permits has been strengthened to ensure applicants are aware of their responsibility to check the van they intend to hire qualifies;
- An explicit condition has been added to state that once allocations are used no further permits will be given until the scheme year restarts;
- Applicants are now told that accounts not used within 12 months may be deleted; and
- An improvement to permit holder account security has been introduced requiring the insertion of a code sent via email when the holder accesses their account. This does not require a change in terms and conditions.

A condition relating to intimidating, threatening or abusive behaviour towards staff or other site users is already in place telling applicants that we will pursue offenders and that CCTV and bodycams are in use on site.

Finally, if a Meet and Greet Operative believes a site user in a car is carrying trade waste entry will still be refused.

## **5. Environmental Impacts of the Access Policy and Van Permit Scheme**

A common fear that can accompany restrictions to access to HWRCs is that fly tipping will increase across areas and particularly close to HWRCs. In response to the question being asked, District Officers have not reported any increases in fly tipping that could be attributed to the introduction of access restrictions or the Van Permit Scheme.



## 6. Communicating the Proposed Changes

It is the intention to start communicating the changes to the Access Policy and Van Permit Scheme as soon as practicable after approval of the changes. A multi-channel approach will be followed including:

- Contacting every existing permit holder highlighting the changes to the Van Permit Scheme's terms and condition;
- Updating the recycle4greatermanchester website;
- Provide leaflets on site to the drivers of vehicles covered by the changes; and
- Contact local van hire companies to notify them of changes.

If the revisions to the terms and conditions are approved, then the GMCA Communications team will work with the SUEZ Communications Manager to implement the following activities:

- Briefing for all HWRC operatives on the changes;
- Briefing for members and officers in the council waste teams;
- Email to all existing permit holders to advise them of the revision to the Terms and Conditions;
- Leaflet to be given out to on the HWRC sites advising drivers of the affected vehicles of the changes, with information on alternative ways of disposing of their waste;
- Briefing note on the scheme and the changes to be provided to District councillors;
- Updated banners and signage on all HWRCs advising users about the van permit scheme;
- Updates to the van permit pages on the Recycle for Greater Manchester website; and
- Increased radio and digital advertising to raise awareness of the permit scheme with a particular focus on those hiring vans and what they need to do before they visit a HWRC.

## Appendix 1 Consolidated List of Proposed Changes

Table A1.1 Proposed changes to the HWRC Access Policy

Proposed change	Rationale for the change
Vehicles designed primarily to provide a service or to carry goods, not people (e.g. flat bed trucks, caged tippers, tail lift vehicles, car recovery and transportation vehicles)	These vehicles are commercial in nature and larger in size and can carry significant quantities of waste. Also, may be of a length whereby they cannot negotiate the HWRC road network due to tight bends.
Limiting vehicle length to a maximum of 5.3 metres	HWRCs designs are based on the average user vehicle being 4.8 metres in length but vehicles up to 5.3 metres can be accommodated. Articulated combinations (vans/cars with trailers) are permitted even if exceeding 5.3 metres.
Limiting vehicles to a gross vehicle weight of 3.5 tonnes	Vehicle with a GVW exceeding 3.5 tonnes can carry several tonnes of waste – quantities that exceed what one might consider reasonable for home improvement work.
A trailer (whether single or double axle) that was not purposely designed and built as a goods carrying trailer	We have seen a number of examples of trailers fashioned from e.g. cut-down caravans or the bare chassis of other vehicles. These are not designed for the carriage of goods/waste and we do not consider them safe for use on a HWRC.
Agricultural machinery and vehicles (including horse boxes)	Both in terms of size and carrying capacity these vehicles are unsuitable for the HWRC network.

Table A1.2 Proposed changes to the Van Permit Scheme to apply the proposed HWRC Access Policy changes

<b>Proposed changes</b>	<b>Rationale</b>
Introduction of the changes detailed in Table A1.1 above introduced through the definition of “Excluded Vehicles” and “Applicable Vehicles” at various points in the terms and conditions document.	To implement the HWRC Access Policy.
Insertion of a table explaining how permits are deducted when towing a trailer (clause 5).	For clarification.
Strengthening of wording regarding the applicants duty to ensure the van they are hiring is an Applicable Vehicle and that the GMCA is not responsible for hire charges if the vehicle hired does not meet entry criteria (clause 13).	For clarification.
Insertion of an explicit condition stating that once permit allocations are used no further permits will be given until the scheme year restarts (clause 16).	For clarification.
Dormant accounts (one where no visits have been made in the scheme year) may be deleted requiring applicants to re-register (clause 19).	A housekeeping process to ensure the database remains current and that we are not holding personal data unnecessarily.

## Appendix 2 Examples of Popular Vans and their Lengths

Make	Model	SWB	MWB	LWB
Bedford	Rascal	3.29m	3.675m	N/A
Citroen	Berlingo	3.7m	4.07m	N/A
Citroen	Dispatch PRE 2010 MODEL	4.6m	4.95m	5.136m
Citroen	Dispatch	4.6m	4.95m	5.3m
Citroen	Nemo	3.86m		
Citroen	Relay	4.963m	5.413m	5.598m
Citroen	Spacetourer	4.606m	4.956m	5.308m
Fiat	Doblo	4.253m	4.06m	4.75m
Fiat	Fiorino	3.957m		
Fiat	Full back	5.285m		
Fiat	Scudo	4.805m	N/A	5.135m
Fiat	Punto van	4.030m		
Fiat	Ducato van	4.07m	4.983m	5.998m
Fiat	Talento	4.99m	N/A	5.399m
Ford	Transit - pre 2017	4.863m	5.230m	5.680m
Ford	Transit - 2017 onwards	N/A	5.585m	6.03m
Ford	Transit - 2019 onwards	N/A	5.531m	5.981m
Ford	Transit Courier	4.16m		
Ford	Transit Connect	4.418m	N/A	4.8m
Ford	Transit Kombi pre 2019	4.16m	N/A	5.339m
Ford	Transit Kombi 2019 onwards	4.973m		5.340m
Ford	Transit Custom	4.972m	N/A	N/A
Ford	Fiesta van	3.982m		
Ford	Escort van	4.534m		
Ford	Ranger	5.277m		
Ford	Tourneo	4.863m	4.97m	5.34m
Hyundai	I800	5.125 - 5.150		
Hyundai	iLoad	5.150m		
IVECO	DAILY range	5.477m	N/A	7.012m
Isuzu	D-Max	5.295m		
Isuzu	Rodeo	5.035m		
LDV	Pilot	4.76m	5.03m	5.53m
LDV	Cub	4.65m	4.725m	5.54m
LDV	Maxus	4.92m	5.67m	5.67m
Mercedes	Citan Panel/ Crew Van	3.937m	4.321m	4.705m
Mercedes	Citan Tourer	N/A	4.321m	4.705m
Mercedes	V Class Marco Polo	4.895m	5.14m	5.370m
Mercedes	Viano	4.748m	5.003m	5.223m
Mercedes	Vito	4.763m	5.008m	5.238m
Mercedes	Vito approx 2014 onwards	4.895m	5.14m	5.37m
Mercedes	Sprinter - pre 2018	5.24m	5.64m	7.348m
Mercedes	Sprinter 2018	5.267m	5.932m	6.967m
Nissan	NV200	4.560m		
Nissan	NV400	5.048m	5.548m	6.198m
Nissan	Terrano	4.242m	4.365m	4.722m
Nissan	Crew bus	N/A	5.48m	N/A
Nissan	Kubistar	4.035m		
Nissan	Vannett	4.37m	4.655m	5.055m
Nissan	Primastar	4.782m	N/A	5.182m
Peugeot	Partner	4.380m	4.628m	4.628m
Peugeot	206 van	3.822m	N/A	N/A
Peugeot	Expert	4.609m	4.959m	5.309m
Peugeot	Boxer	4.963m	5.413m	5.998m
Peugeot	Bipper	3.864m		
Peugeot	Traveller	4.606m	4.96m	5.309m
Renault	Kangoo	4.213m		
Renault	Clio van	4.062m		
Renault	Master	5.048m	5.548m	6.198m
Renault	Trafic	4.999m		5.399m
Renault	Trafic COMBI	4.999m		5.182m
Suzuki	Supercarry	3.175m	3.275m	3.370m
Toyota	Hiace	4.715m	5.16m	N/A
Toyota	Proace (pre-2016)	N/A	4.805m	5.135m
Toyota	Proace (2016 onwards)	4.6m	4.956m	5.3m
Toyota	Granvia (motor caravan)	4.715m	4.79m	
Vauxhall	Combo	4.39m	N/A	4.74m
Vauxhall	Vivaro - 2014 onwards	4.999m		5.399m
Vauxhall	Vivaro - pre 2014	4.787m	4.998m	5.182m
Vauxhall	Vivaro Combi (MPV 9 seater)	4.782m		5.182m
Vauxhall	Corsavan	3.999m		
Vauxhall	Astravan	4.288m	4.515m	N/A
Vauxhall	Movano	5.048m	5.548m	6.198m
Volkswagen	Caddy	4.408m	N/A	4.878m
Volkswagen	LT35 (1975 - 2006)	5.305m	5.585m	6.535m
Volkswagen	Transporter Panel Van	4.89m	4.904m	5.304m
Volkswagen	Transporter Kombi Van	4.89m	N/A	5.304m
Volkswagen	Transporter Shuttle Van	4.904m	N/A	5.304m
Volkswagen	Crafter panel van	5.24m	5.905m	6.94m
Volkswagen	Crafter chassis and double cab, dropside, tipper, luton	N/A	5.865m	6.67m

## Appendix 3 Proposed amended Van Permit Scheme Terms and Conditions

### Greater Manchester Combined Authority (GMCA) Household Waste Van and Trailer Permit Scheme (Permit Scheme)

In September 2019<sup>1</sup> the GMCA adopted a policy that placed controls on vehicular access to its Household Waste Recycling Centres (HWRCs) and certain other waste facilities where household waste is disposed of by householders and managed by our contractor SUEZ within Greater Manchester (Waste Facilities). Subsequently the GMCA approved the introduction of a permit system to manage the use of specified vehicle types (commercial-type vehicles) by householders delivering their own household waste<sup>2</sup>. In July 2023 the Policy was reviewed and revised amending these terms and conditions.

These terms and conditions cover the Permit Scheme for residents of Greater Manchester<sup>3</sup> who own or who have authorised access to Applicable Vehicles or twin axle trailers and use them for the disposal of their household waste at Waste Facilities.

**Please read the following permit Terms and Conditions. In completing the application process you agree to these Terms and Conditions in order to obtain your permit.**

#### **Excluded vehicles**

For clarity, the following categories of vehicles (whether a van, vehicle, pick up or double axle trailer) **will not** be given a permit or allowed entry to a HWRC:

- Vehicles designed primarily to provide a service or to carry goods, not people (e.g. flat bed trucks, caged tippers, tail lift vehicles, car recovery and transportation vehicles);
- Vehicles exceeding 3.5t gross vehicle weight;
- Vehicles exceeding 5.3m in length;
- A trailer (whether single or double axle) that was not purposely designed and built as a goods carrying trailer. For example, trailers adapted from caravans, trailer tents, sub-frames, chassis etc. will be refused a permits and/or entry into the HWRCs; and
- Agricultural machinery and vehicles, (including horse boxes).

**Applicable vehicles** for the purposes of this Permit Scheme include:

- Car-derived vans e.g. a vehicle built on a car chassis but with e.g. with panel sides or side facing windows and no rear seats;
- Open backed pick ups;
- Purpose-built vans within length and weight limits; and
- Double axle trailers manufactured for the purpose of carrying goods (including waste).

For any vehicles:

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<sup>1</sup> [https://democracy.greatermanchester-ca.gov.uk/documents/s2208/GMCA\\_HWRC\\_Access\\_Restrictions\\_Report\\_Sept19.pdf](https://democracy.greatermanchester-ca.gov.uk/documents/s2208/GMCA_HWRC_Access_Restrictions_Report_Sept19.pdf)

<sup>2</sup> [https://democracy.greatermanchester-ca.gov.uk/documents/s8545/HWRC\\_Access\\_%20Policy\\_PartA\\_Report\\_plus\\_AppendixA\\_WRC\\_22Jul20.pdf](https://democracy.greatermanchester-ca.gov.uk/documents/s8545/HWRC_Access_%20Policy_PartA_Report_plus_AppendixA_WRC_22Jul20.pdf)

- length must be less than 5.3m;
- gross weight must be less than 3.5t.

1. **The Permit Scheme is strictly for household waste and recyclables.** Trade Waste is strictly not permitted to be disposed of at Waste Facilities. Site staff have the right to turn away anyone suspected of bringing Trade Waste to site whether or not a permit has been issued.

There are many commercial facilities across Greater Manchester that accept Trade Waste. In addition, through its contractor, the GMCA provides facilities for the deposit of Trade Waste for a charge. For the location of such facilities please visit:

<https://recycleforgreatermanchester.com/how-do-i-get-rid-of-business-waste/>

Trade Waste is defined as waste arising from any trade, business, industrial or commercial activities. Furthermore, anyone who has received any payment/reward for carrying waste or produces waste from their work is carrying Trade Waste and cannot take this waste to any of the listed GMCA Waste Facilities for disposal as household waste.

2. For safety, householders must comply with site signage/markings and the instruction of site staff as well as all waste acceptance policies for the Waste Facilities. Details of what can be accepted at the Waste Facilities can be found on the GMCA's website at:

<https://recycleforgreatermanchester.com/recycling-centre-guide/>

Permit holders must segregate their waste so that the quantities recycled can be maximised.

3. Intimidating, threatening or abusive behaviour towards staff or other site users will not be tolerated. Action will be taken to pursue offenders including any person who fails to comply with site safety at any Waste Facility. All sites have CCTV and staff wear bodycams. Permits will be revoked and/or a person can be barred from attending any Waste Facility where a site user has failed to comply with site safety, intimidates, threatens or is abusive to staff or other site users.

4. Access to Waste Facilities will be refused for Applicable Vehicles or double axle trailers without a valid permit.

5. A permit allows Greater Manchester<sup>3</sup> residents to access the Waste Facilities with a specified commercial-type vehicle or trailer to dispose of their own household waste subject to the visit number limits detailed below. The permitted visits per year for each vehicle type are:

- Van up to 3.5t gross vehicle weight – 18 visits per year;
- Car plus double axle trailer – 18 visits per year;
- Open back pick up – 18 visits per year
- Cars, MPV, SUVs or equivalent vehicles with no adaptations are permitted to have 52 visits per year; and

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<sup>3</sup> For the purposes of the GMCA's Permit Scheme Greater Manchester residents are those residing in Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside or Trafford. Wigan has its own arrangements and HWRC facilities for its residents to use.

- Short term hired vehicles are subject to the same number of visits for their vehicle classification.

### Examples of how the permit allocation for vehicles towing a double axle trailer works

<b>Example:</b> <b>1 - Van towing a double axle trailer</b>	
<b>Annual visit allocation</b>	<b>Annual allocation remaining after visit</b>
(i) Van carrying waste on its own has 18 permitted visits each year	(i) Van on its own now has 17 visits remaining
(ii) Van and trailer combination has 18 permitted visits each year (Van is not carrying waste but trailer is carrying waste)	(i) If for one visit the site operative deems the van does not contain waste, a single visit allocation will be deducted and there will be 17 visits remaining.
(iii) Waste-containing van and trailer combination has a combined total of 18 permitted visits each year (Van and trailer are both carrying waste)	(i) This will count as a double visit and would reduce the annual allocation (for the van and trailer combination) to 16.
<b>Example:</b> <b>2 - Unadapted car towing a double axle trailer</b>	
<b>Annual visit allocation</b>	<b>Annual allocation remaining after visit</b>
(i) Car has 52 permitted visits each year	(i) Car now has 51 visits remaining
(ii) Trailer has 18 permitted visits each year	(i) Trailer now has 17 visits remaining
*If the car then visits without the trailer, the car allocation reduces to 50 and the trailer remains at 17.	

#### 1 Site operatives have the right to refuse entry to:

- any vehicles appearing to carry Trade Waste; and/or
- applicable vehicles without a permit and where the GMCA or its Contractor, at their discretion, believe a permit is required.

Applicable vehicles are those not included under the “**Excluded vehicles**” heading above but:

- are designed to carry goods, not people;
- with no rear side facing windows;
- with no rear seats (whether by design or removed);
- with an open back;

- with a back which is separate to the main cab area;
  - are less than 5.3m in length;
  - are less than 3.5t gross vehicle weight; and/or
  - any other vehicles or adapted vehicles which are of a similar or equivalent commercial nature.
- 2 Only one permit will be granted per household and for one nominated vehicle registered at the same household address. If a household has more than one applicable vehicle they will have to decide which applicable vehicle they require a permit for. It is not permissible to apply for a permit for multiple applicable vehicles from the same address or for the same vehicle registration to be issued with a permit from multiple addresses. Attempts to do so may result in an application failing or the later revocation of the permit.
  - 3 Proof of address evidence is a copy of the current Council Tax bill or other utility bill. Failure to upload suitable evidence of address will result in application failure or revocation of a permit even after issue.
  - 4 Proof of vehicle registration (pages 1 and 2 of the V5C document) is required as part of the online registration process. Failure to upload this document will result in the failure of the permit application. The address on the V5C document must be the same as the one on the evidence uploaded to demonstrate the address.
  - 5 Permits will only be issued to householders who intend to deposit their own household waste and applicants will be required to declare this as part of the application process. If a vehicle is carrying Trade Waste it will need to comply with the relevant legislation<sup>4</sup> and is not permitted to enter any GMCA Waste Facilities to dispose of this waste as if it is household waste.
  - 6 The GMCA may check information provided by the permit applicant with, for example, the Driver and Vehicle Licensing Agency, the Environment Agency, local authority enforcing departments etc. If necessary, information will be passed to the Police.
  - 7 If you visit any of the GMCA Waste Facilities more than once in one day, each visit will be counted separately as one permitted visit for a vehicle and two for a vehicle and trailer combination where waste is carried in each.
  - 8 Applicable vehicles and/or trailers, which have been hired by a householder to deposit household waste, are permitted to enter the Waste Facilities but will also need to apply for a hire vehicle permit. In addition, the householder will be required to bring the hire agreement with them and present it to site staff upon arrival. A permit for a hire vehicle is only valid for a single day and hirers of vehicles will need to apply for a new permit on a daily basis. These visits will be deducted from the household allowance. Van hirers are **strongly advised** to check the eligibility of the vehicle they intend to hire in advance of applying for a permit. The GMCA is not responsible for any costs associated for the hiring of a vehicle that is refused entry because it does not meet the criteria for Applicable Vehicles.

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<sup>4</sup> See <https://recycleforgreatermanchester.com/how-do-i-get-rid-of-business-waste/>



- 9 The permit is only valid for the applicable vehicle and/or trailer as registered on the application. Permits are approved per address and by vehicle/trailer, so any member of your household may visit the site with this vehicle and/or trailer. Alternatively, you may designate a driver to help you bring your household waste to the site, provided that you, as the producer and owner of the waste, accompany them and you have not paid for this service. If for any reason you are unable to accompany your own household waste to the site, please email [gmcavanpermit.uk@suez.com](mailto:gmcavanpermit.uk@suez.com) to seek further advice. If you change your vehicle or address the details must be changed on the permit system for the permit to still be valid.
- 10 If you lend your permitted van to a family member, friend or neighbour (for example) the visit will be deducted from your remaining allocation of permits.
- 11 Once the annual permit allocation has been used additional visits will not be granted.
- 12 Any car, MPV or SUV or other vehicle that appears to have been adapted to operate like a van (such as through the removal of seating to increase internal capacity) and appears to be an applicable vehicle will need to register as a van. Site operatives have the right to refuse entry of such vehicles without a permit. Equally the use of anything towed that was not originally designed for the purpose of carrying goods is not permitted and will be refused entry to the Waste Facilities if carrying waste for disposal.
- 13 The correct permit must be presented on arrival at the Waste Facility for scanning by a site operative. The permit can be presented in digital format (i.e. on a mobile telephone) or in a clean and uncrumpled paper format. If a permit cannot be presented entry will be refused.
- 14 The GMCA reserves the right to cancel permits and accounts (including those unused for 12 months) or amend the operation of the Permit Scheme at any time.

**By accepting these Terms and Conditions you are agreeing to abide with each clause. By accepting the Household Waste Declaration disclaimer, you are confirming that the waste is your household waste and is not from a business or being carried for reward.**

If you have any further enquiries regarding the HWRC household waste permit scheme please contact [gmcavanpermit.uk@suez.com](mailto:gmcavanpermit.uk@suez.com)