

Waste and Recycling Committee

Date: 17 January 2024

Subject: Review of the impact of the HWRC Access Policy

Report of: Paul Morgan, Head of Commercial Services, Waste and Recycling Team

Purpose of Report

This report presents several strands of evidence to assess the impact of the restricting access to the Household Waste Recycling Centres on achieving the aims of the Policy.

Recommendations:

Members of the Committee are requested to:

1. Note the report and the findings of the impact assessment; and
2. Note the amendment of the Controlled Waste Regulations as regards “DIY waste”.

Contact Officers

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Waste and Resources Team

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers

To note that the HWRC Access Policy has reduced the use of the network by vans which (i) are favoured by traders who should not be using the network, and (ii) have the ability to carry larger quantities of waste. As a consequence, sites are less congested, staff are placed in positions of lower confrontation, tonnages are reduced and recycling rates have grown.

Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation			
Equality and Inclusion					
Health					
Resilience and Adaptation					
Housing					
Economy					
Mobility and Connectivity					
Carbon, Nature and Environment	G	Increased recycling rates contribute positively to the GMCA's net zero progress.			
Consumption and Production	G	The HWRCs are a key provider of secondary materials for the circular economy.			
Contribution to achieving the GM Carbon Neutral 2038 target	It contributes to the continuing promotion of reuse and recycling of household waste at the HWRCs and also encourages traders who may have previously used the HWRCs unlawfully to dispose of waste often without segregating for recycling.				
Fur	G Positive impacts overall, whether long or short term.	<table border="0"> <tr> <td>A Mix of positive and negative impacts. Trade-offs to consider.</td> <td>R Mostly negative, with at least one positive aspect. Trade-offs to consider.</td> <td>RR Negative impacts overall.</td> </tr> </table>	A Mix of positive and negative impacts. Trade-offs to consider.	R Mostly negative, with at least one positive aspect. Trade-offs to consider.	RR Negative impacts overall.
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Risk Management

There are no risk considerations arising from this report.

Legal Considerations

There are no legal considerations arising from this report.

Financial Consequences – Revenue

There are no revenue considerations arising from this report.

Financial Consequences – Capital

There are no capital considerations arising from this report.

Number of attachments to the report: None.

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- 11th October Committee Meeting report [GMCA Part A Report Template \(greatermanchester-ca.gov.uk\)](https://www.greatermanchester-ca.gov.uk/gmca-part-a-report-template)
- 13th July Committee Meeting report - [GMCA Part A Report Template \(greatermanchester-ca.gov.uk\)](https://www.greatermanchester-ca.gov.uk/gmca-part-a-report-template)
- For the amendments to the Controlled Waste Regulations: [The Controlled Waste \(England and Wales\) \(Amendment\) \(England\) Regulations 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uk/2023/10/1/controlled-waste-regulations-amendment) and [The Controlled Waste \(England and Wales\) \(Amendment\) \(England\) Regulations 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uk/2023/10/1/controlled-waste-regulations-amendment)

Tracking/ Process

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

Yes

Exemption from call in

N/A

GM Transport Committee

N/A

Overview and Scrutiny Committee

N/A

1. Introduction/Background

In July 2019 the Waste and Recycling Committee approved GMCA's Household Waste Recycling Centre Access Policy. This Policy was introduced to address the abuse of the HWRC network by traders seeking to dispose of their commercial waste illegally. This caused a number of problems including:

- congestion on site, which may deter other site users;
- difficulties of segregating commercial and household waste, and associated reporting;
- additional service vehicles being required on site;
- the costs of additional disposal;
- effects on the morale of site staff if they know abuse is taking place and they are not supported in taking preventative action; and
- commercial waste not being segregated into different recyclable streams, thereby affecting the recycling rate of the affected HWRC facility.

The Policy introduced threshold levels for visits:

- Cars and cars with single axle trailers – threshold level of 52 visits per year; and
- Cars with twin axle trailers and all vans and pick up trucks to be considered as trigger vehicles and subject to enhanced checks¹.

Proposed 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; and
- All trigger vehicles limited to no more than 5 bags of rubble per visit.

After period of operation (and punctuated by the pandemic) the Access Policy was revised to introduce a permit system for vans, pick-ups and double-axle trailers. Most recently the Policy was further revised to exclude vans of greater than 5.3 metres in length and direct pick-ups and cars greater than 5.3 metres to specific sites.

This report assesses the impact of the Access Policy on visitor numbers, waste tonnages and the recycling performance.

¹ Enhanced checks being assessment of the waste and enquiring of the driver the source of the waste by site operatives.

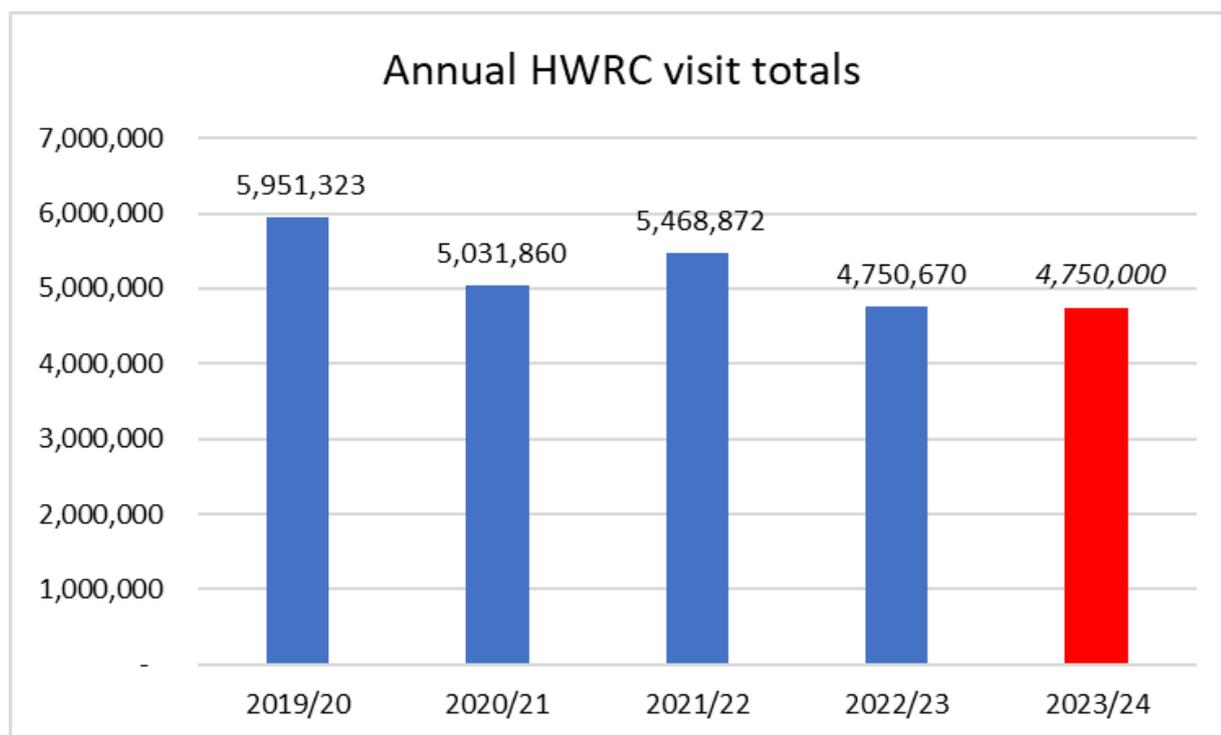
2. HWRC User Visits

On all the HWRCs automatic number plate recognition (ANPR) is in place. This records the total number of visits to site by vehicles – both in total and by individual registration numbers. Previously we have reported site usage based on registration numbers and identified that the overwhelming majority of users visit the network well within the threshold levels detailed in section 1 above.

There are several ways to present the wider analysis of the usage of the HWRC network from total annual visits across the network down to monthly visits to individual sites.

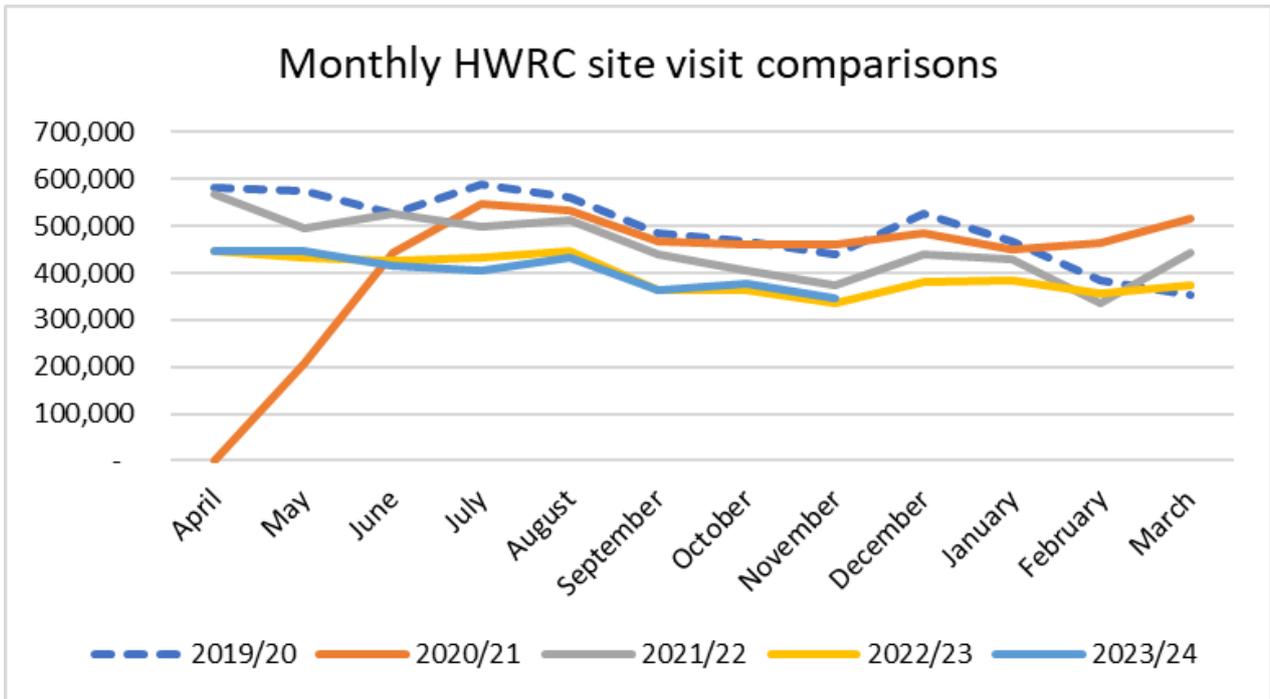
2.1 Annual Visit Totals

The bar chart below presents the site user visits for each year from 2019/20 to the present year (with this final figure being a forecast). It can be clearly seen that there is a consistent downward trend – the COVID year of 2020/21 when the sites closed and had restricted access for a period is a small deviation from the trend. With the forecast for 2023/24 we are starting to see a levelling off of total visit numbers.



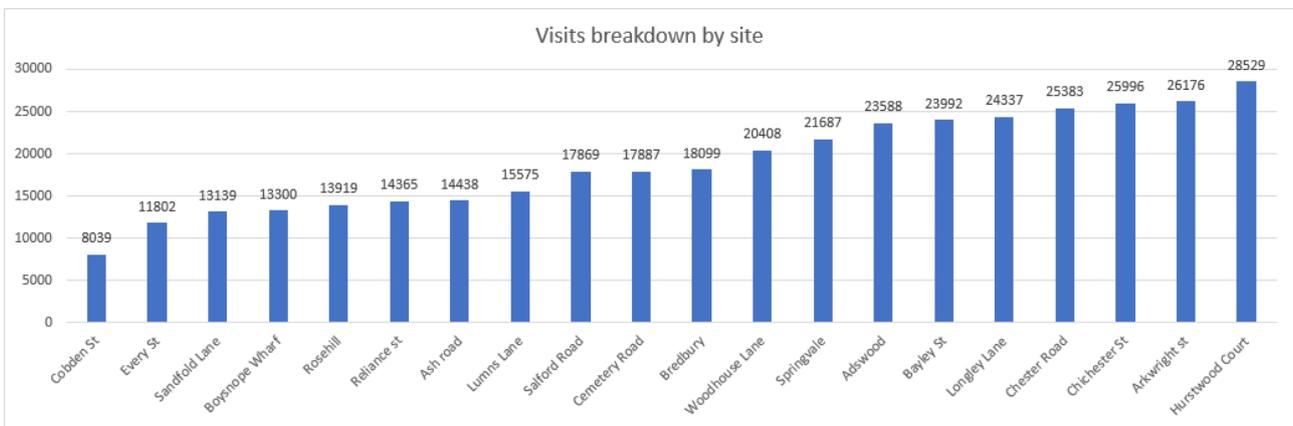
2.2 Monthly Visit Totals

Looking at the monthly usage comparisons on an annual basis (line graph below) you can see the year-on-year reductions in visits as well as monthly and seasonal trends in usage emerge. As touched upon above, the stabilisation of usage can be seen in the close mirroring of the visit numbers in 2022/23 and 2023/24.



The network is forecast to receive 100,000 fewer monthly visits in the current year compared to 2019/20.

Looking at individual sites – a snapshot of site visits for October 2023 (the latest data available at the time of writing) is presented in the bar graph below.



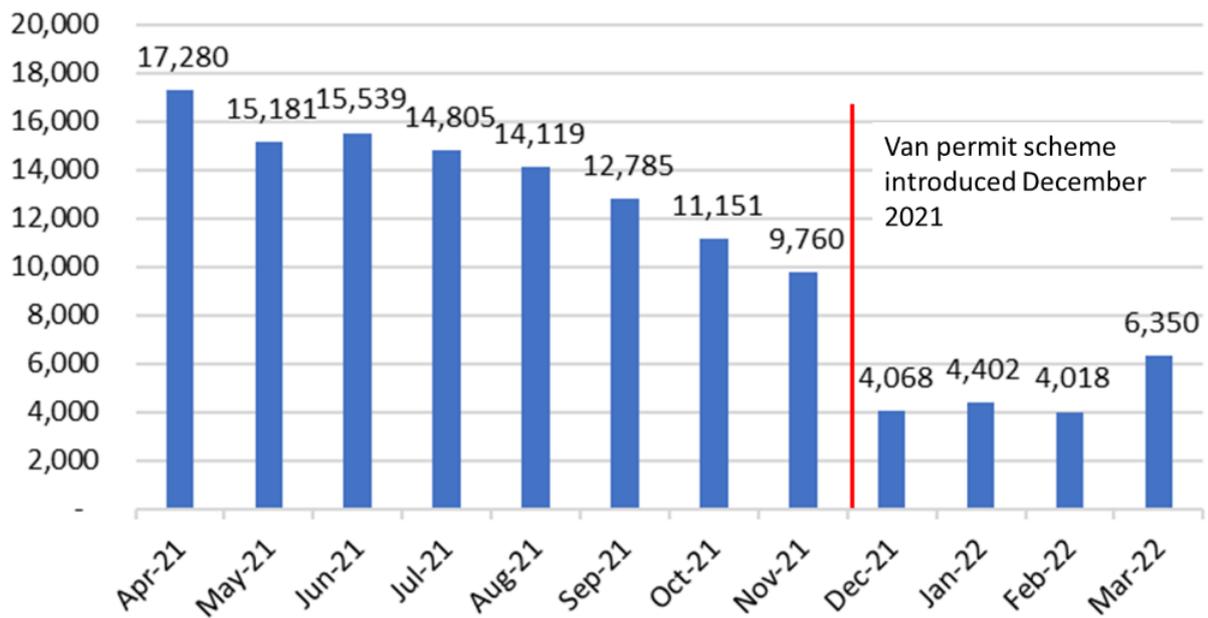
This shows a wide range in usage levels from the most used – Hurstwood Court with 28,529 visits – to the least - Cobden Street with 8,039 visits.

It is interesting to note that the number of visits made to Hurstwood Court in October 2023 would not have been high enough to be in the top five of visited sites in 2020.

2.3 Visits by Permit Holders

The van permit system went live in December 2021. The impact of the introduction of the system can be seen in the following graph which shows van visits to HWRCs in the year 2021/22.

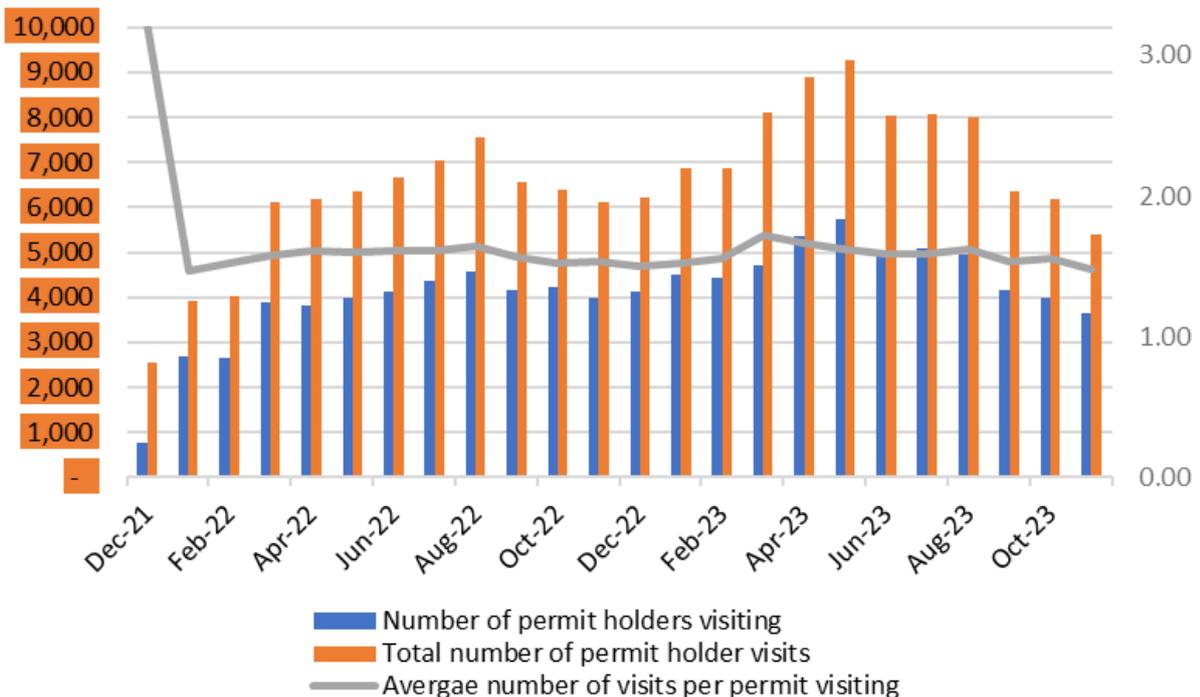
Van visit numbers in 2021/22



At 8th December 2023 the number of permit holders stood at 25,836 having recently excluded 2,712 permits because of vehicle length (9% reduction due to the introduction of the 5.3m length restriction).

The graph below shows the number of visits individual permit holders make to the HWRC network on a monthly basis and the total number of visits made by permit holders.

Permit holder usage patterns



This shows that:

- Permit holder visits now comprise around 2% of total visit numbers; and
- Permit holders now visit the HWRCs on average 1.6 times each month.

3. HWRC Tonnages

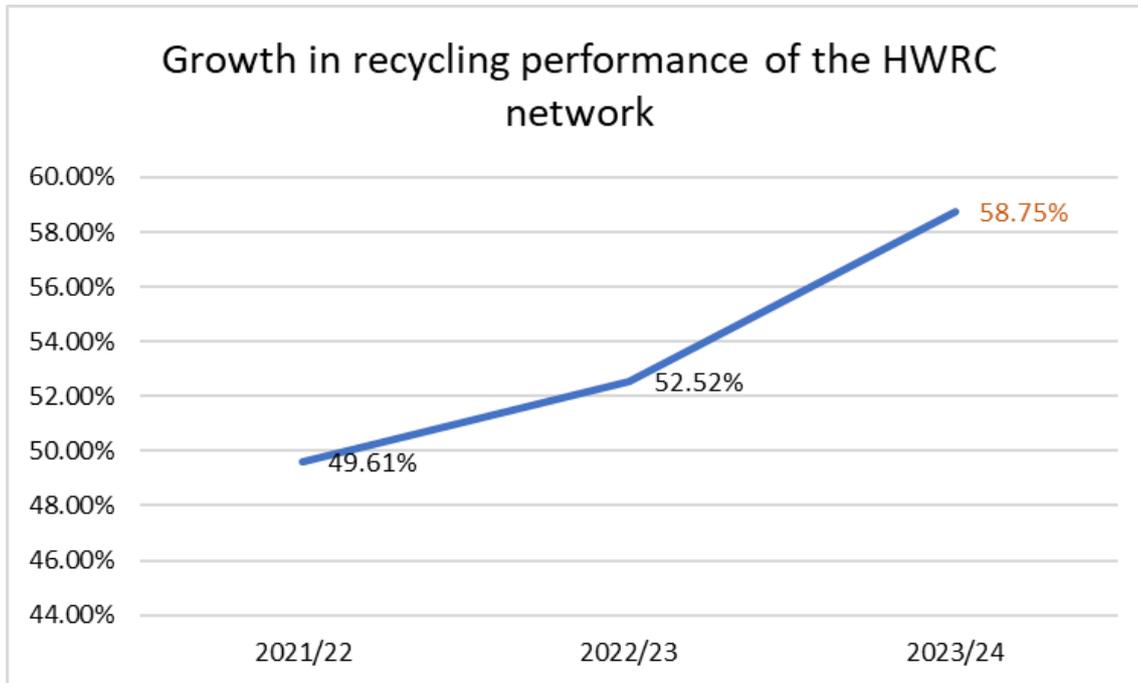
One of the arguments for the introduction of the van restrictions was that these vehicles have a far greater capacity for carrying waste compared to a family car and that is the reason any traders using the network did do so in vans. As a consequence of the restrictions we would expect to see a marked reduction in key waste streams.

The notable reductions from 2021/22 to 2022/23 include:

- Contract Waste – 17% reduction (40,595 tonnes);
- Rubble – 19% reduction (7,492 tonnes);
- Wood - 6,069t (14% reduction);
- Thermally Recovered waste - 19,555 tonnes (20% reduction); and
- Green - 2,938 tonnes (22% reduction).

4. HWRC Recycling Performance

With the loss of wastes at the HWRCs you could presume that recycling performance also reduced. It was noted that many suspected traders did not segregate waste for recycling consigning their materials to residual waste – presumably for speed and personal convenience. As a result the loss of this mixed waste has been a benefit to recycling performance alongside the many other measures Suez have introduced on site. The line graph below shows the growth in recycling rate across the period demonstrating that the restrictions have not had a negative impact on recycling performance (noting that the figure for the current year is an estimate).



5. Evidence that the Access Policy is Achieving its Aims

There are a number of lines of evidence that together indicate the HWRC Access Restrictions Policy is achieving its aims:

- The data presented in section 2 above clearly demonstrates the overall reduction in usage of the HWRC network. There are seasonal trends but between 2019/20 and 2023/24 the network is receiving 100,000 fewer visits each month on average;
- In terms of total van visits, prior to the access policy the network received around 15,000 van visits per month, it is now on average around 7,200 – over 50% reduction in van usage;
- Tonnages of key waste streams (particularly those most associated with the trades) have reduced significantly in line with the reduction in van usage; and
- Crucially, the network's recycling performance has grown strongly over the period as the quantities of mixed non-recyclable wastes have reduced.

One final telling piece of analysis is the reduction in usage at sites that were known to be favoured by traders - Sandfold Lane in Levenshulme was one such site. This HWRC is located in a mixed use area close to residential properties and small industrial units and levels of visits by (sometimes sign written) vans and trailers carrying significant amounts of certain waste types was known to be high.

In October 2020 Sandfold Lane received 29,052 visits and was the 5th busiest site. In the same month in 2023 the site was the 18th busiest site with 13, 139 visits – a reduction of

54% usage compared to the 'global' 18% reduction in usage across those two comparable months.

The HWRC Access Restriction Policy has made a significant contribution to:

- reducing congestion on sites;
- improving the segregation of recyclable waste;
- reducing the numbers of HGV-type service vehicles having to service sites and used Greater Manchester's congested road network;
- reducing disposal costs; and
- improving the working conditions and morale of staff as conflict between suspected traders and staff has reduced.

Suez continue to monitor the evolution of the behaviour of suspected traders as they seek to find ways to evade the access restrictions (such as through the use of self-adapted cars). If and when patterns emerge we will address them through future revisions to the Van Permit Scheme which will be brought to the Waste and Recycling Committee when appropriate.

6. Amendment to the Controlled Waste Regulations

In 2022 the government undertook a public consultation to changes to the existing Controlled Waste Regulations as regards the delivery of household "DIY waste" to HWRCs. This sought views on the definition of DIY waste, the prohibition of charging for such waste and limiting quantities that households could deliver.

As a consequence, in November 2023 the existing Regulations were amended so now householders can take "waste from construction or demolition works, including preparatory works" to HWRCs but:

- That waste can only come from that occupier's domestic property;
- Cannot be waste from work for which a charge has been made (i.e. it can only be waste generated by the householder – not a tradesperson);
- The amount cannot exceed 100 litres and be capable of being fitted into two 50 litre bags;
- A single item cannot exceed 2,000mm x 750mm x 700mm in size; and
- The waste delivered does not exceed four single visits per household in any four-week period.

This amendment prohibits charges for DIY waste (some authorities charged for rubble for example) that is delivered as above. Greater quantities/deposit frequencies can be charged.

As the changes have only recently been made (and come into effect of 1st January 2024) their impact has not been assessed. The impacts will be assessed over the coming weeks and if changes are required to the current HWRC Access Policy then these proposals will be presented to a future meeting of the Committee.