

## Greater Manchester Combined Authority

### Waste and Recycling Committee

Date: 12 March 2025

Subject: Review of the HWRC Access Policy/Van Permit Scheme and HWRC Usage

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

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#### Purpose of Report

This report presents data on the usage of the household waste recycling centre network and reviews the HWRC Access Policy and Van Permit Scheme.

#### Recommendations:

The Committee is requested to:

1. Note the findings of the report; and
2. Approve the recommendations to not revise the Policy at this time based on the findings of the review.

#### Contact Officers

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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 and reduced whilst 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.

**Summary:**

<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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## Risk Management

Any risks arising from this report and the HWRC Access Policy are managed in line with GMCA's risk management framework.

## Legal Considerations

There are no legal considerations within this report.

## Financial Consequences – Revenue

There are no financial consequences arising from this report.

## Financial Consequences – Capital

There are no financial consequences arising from this report.

## Number of attachments to the report:

None

## Comments/recommendations from Overview & Scrutiny Committee

N/A

## Background Papers

- [The original HWRC Access Policy](#)
- [July 2023 HWRC Access Policy review](#)
- [October 2023 Policy clarification](#)
- [The 2024 HWRC Access Policy review and update](#)

## Tracking/ Process

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

Yes

## 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?

None

## Bee Network Committee

N/A

## Overview and Scrutiny Committee

N/A

# 1. Introduction/Background

GMCA provides a network of 20 Household Waste Recycling Centres (HWRCs) across the nine districts in fulfilment of its statutory duty to provide places for “persons resident in its area” to deposit their household waste (section 51(1)(b) of the Environmental Protection Act 1990). These HWRCs are operated by Suez under two contracts (the Waste and Resource Management Services and Household Waste Recycling Centre Management Services contracts) and their performance is reported to GMCA on a monthly basis and to this Committee at each meeting.

This report provides an analysis of data relating to HWRC usage and feedback from site users in order to review the Access Policy and Van Permit Scheme and to consider if any amendments are required.

## 2. GMCA’s HWRC Access Policy

In 2019 GMCA introduced the HWRC Access Policy as a means of deterring the abuse of the network by traders seeking to dispose of their waste at a cost to council taxpayers of Greater Manchester. Trade waste abuse 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 restrictions are summarised below:

1. If you have a car that is less than 5.3 metres in length you can visit any of the 20 HWRCs without a permit but subject to the visit allocation for that category of vehicle (52 per annum);
2. All vans over 5.3 metres are excluded from the HWRC network;

3. If you have a van that is up to 5.3 metres in length you can visit any of the 20 HWRCs but only with a permit and be subject to the visit allocation for that category of vehicle (18 per annum);
4. All pick up-type vehicles require a permit and can only use one of ten designated HWRCs (including those under 5.3 metres);
5. All cars, campervans, minibuses greater than 5.3 metres in length do not require a permit but can only use one of ten designated HWRCs;
6. Double axle trailers require a permit; and
7. All vehicles with a maximum authorised mass exceeding 3.5 tonnes are excluded from all sites.

In the autumn/winter of 2023 a Permit Scheme for van and double axle trailers was introduced to manage these vehicles. Owners of such vehicles need to apply online to obtain a permit that manages their allocation of annual visits.

## 2.1. HWRC Network Visit Numbers

### 1. Overall Usage Data

Each site is equipped with automatic number plate recognition (ANPR) technology that records vehicle registrations and consequently provides visitor counts. This data is held from contract commencement in 2019. The following figures (Figure 1) present visitor numbers on an annual and monthly basis giving comparisons with previous years.

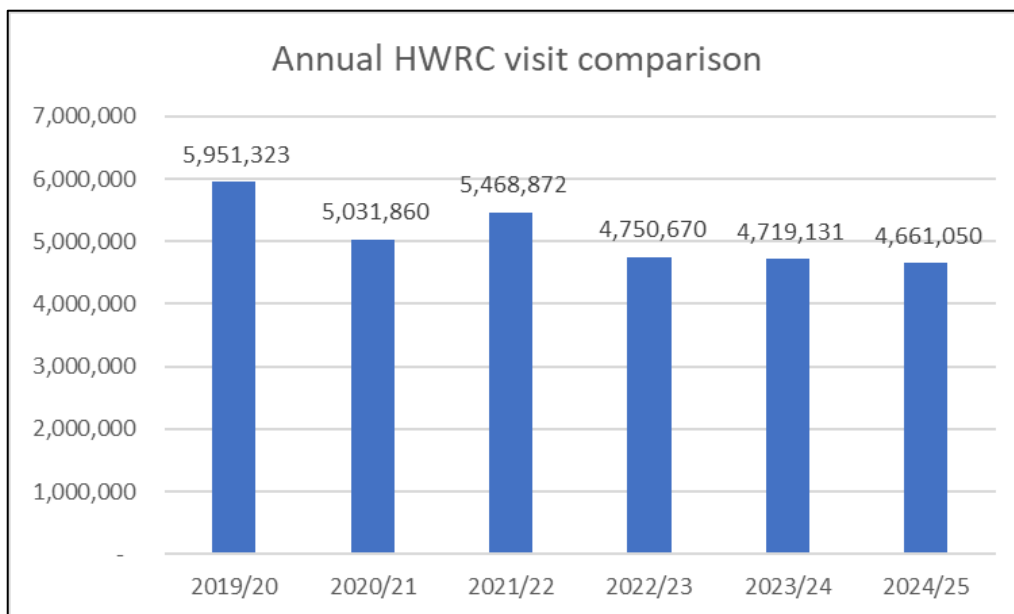


Figure 1: Annual HWRC visitor numbers (2024/25 extrapolated). Note: the last three months of visits data for 2024/25 have been estimated

The visit reduction from contract year 1 (2019/20) to contract year 6 (the current year) is forecast to be in the region of 22% representing a reduction of 1.3 million visits as explained below in Figure 2.

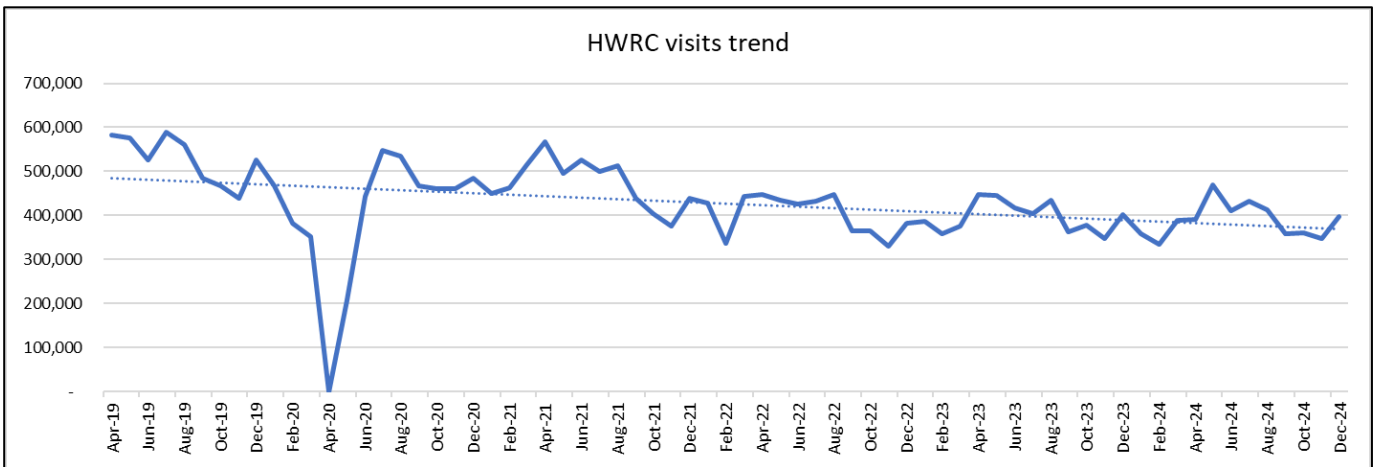


Figure 2: the visit number run chart (noting the HWRC closures on April 2020 and phased reopening during the pandemic)

## 2. Monthly Usage Data

Visit numbers do fluctuate on a monthly basis but Figure 3 further shows the data over the contract period.

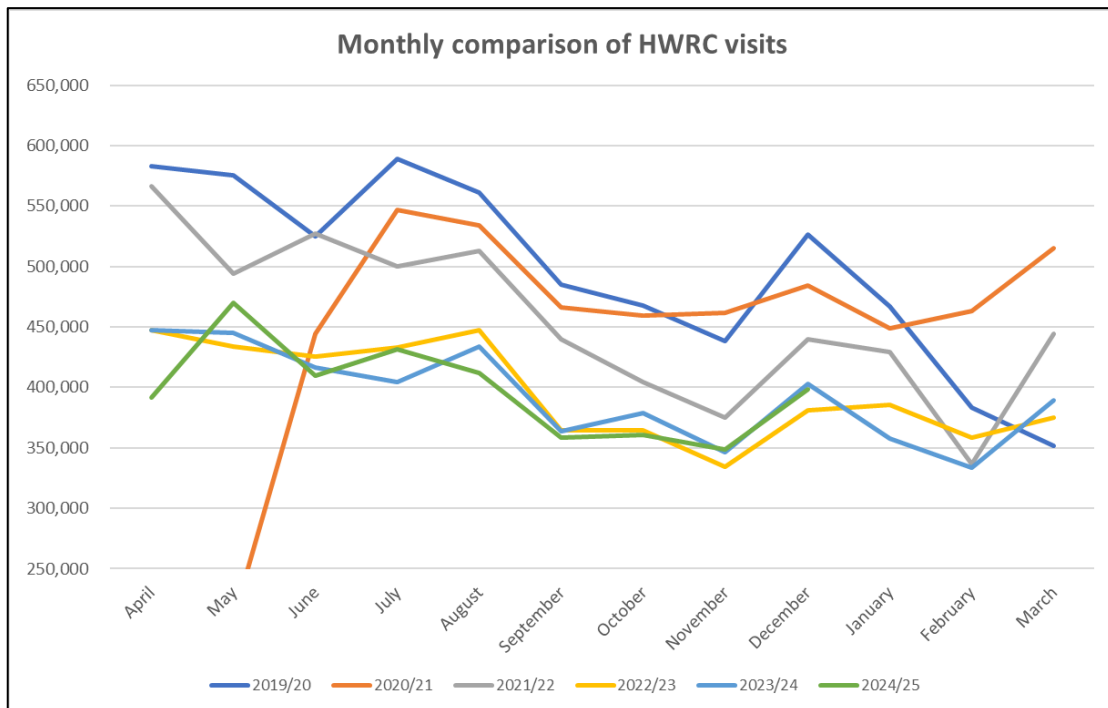


Figure 3: comparison of visits on a monthly basis

What is emerging is an almost steady state pattern of HWRC usage over the last three years with monthly trends being mirrored and visit numbers converging.

### 3. Visits to Individual Sites

The average number of monthly visits to each site (ignoring any seasonal peaks and troughs, location etc.) is 19,421 or 640 per day (based on 2024/25's extrapolated data). However, a number of sites regularly feature in the list of most visited facilities – Figure 4 shows these.



Figure 4: the most visited sites with average monthly usage

### 4. Car Usage Based on ANPR Data

As mentioned above, the HWRCs utilise ANPR technology as a means of managing the HWRC Access Policy. The latest analysis of data for car-based visitors shows:

- Out of 4,632,787 visits by cars, there were 1,032,801 individual registrations recorded. Each registration visits on average 4.5 times per year; and
- 1,431 cars exceeded the 52 annual visits with the top five exceedances being 271, 232, 220, 205, 193 visits annually.

The HWRC Access Policy provides an indicative allocation of 52 visits per year for car users. The data shows that for over 99% of visitors this allocation is more than enough.

For the 0.14% of car users that visit more often than once a week Suez does review this usage. In many cases visits are shown not to be trade waste related with people regularly visiting the Renew shops or dropping off small amounts of household waste for a variety of reasons. If trade waste abuse is suspected, then visitors are challenged and can be barred from site if it is suspected the vehicle is bringing trade waste.

## 5. Van Usage

If you own a vehicle that requires a permit you need to register online to obtain one (this covers 18 visits per year). The application process asks for proof of address and the registration information of the vehicle. It doesn't automatically follow that a householder who owns a van will have any reasons to use it more often than a householder with a car but we do have the data to test this.

At the time of writing there were 13,361 active van permits in place and 320 for double axle trailers.

Figure 5 below plots the usage of the HWRCs by vans and permits permitted to do so.

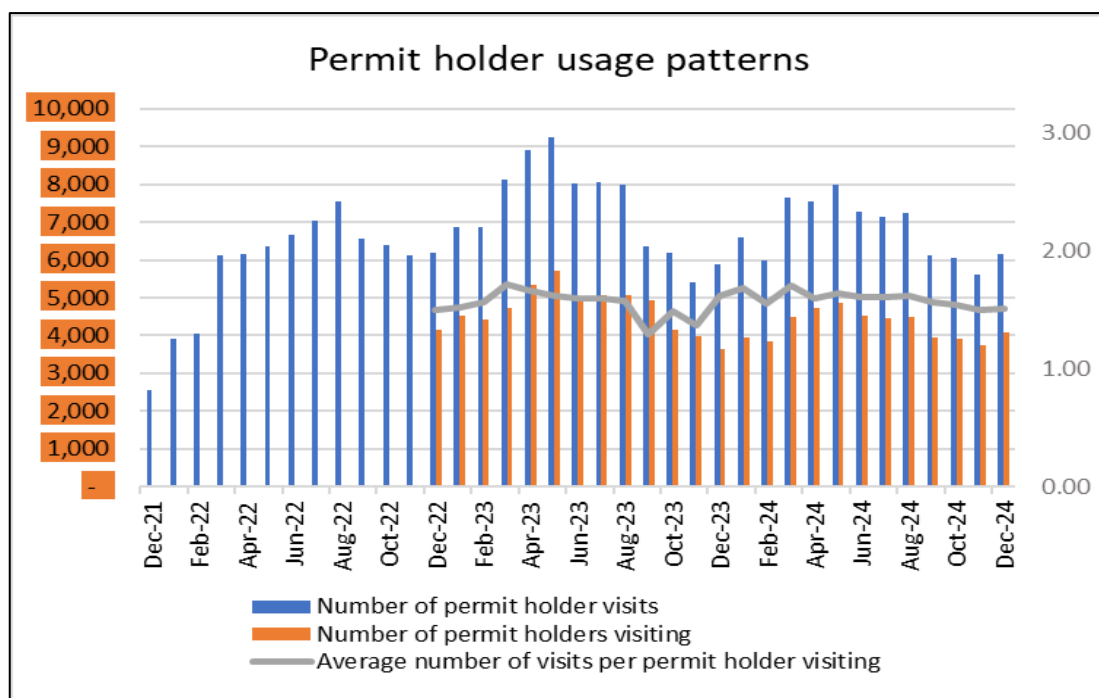


Figure 5: Permit holder usage analysis

The blue bars in Figure 5 show the total number of visits made by permit holders in each month. The shorter orange bars show the number of permit holders making those visits. Dividing the former by the latter gives the average numbers of visits made per month by each permit holder (plotted by the grey line). This then tells us that permit holders visit a little over 1.5 times each month indicating they use their allocation of 18 visits each year fully. Around half of all permit holders visit the HWRCs each month.

A different process is in place to manage the use of hire vans.

Figure 6 below illustrates the levels of hire van visits per month and they represent 0.1% of total HWRC visits.



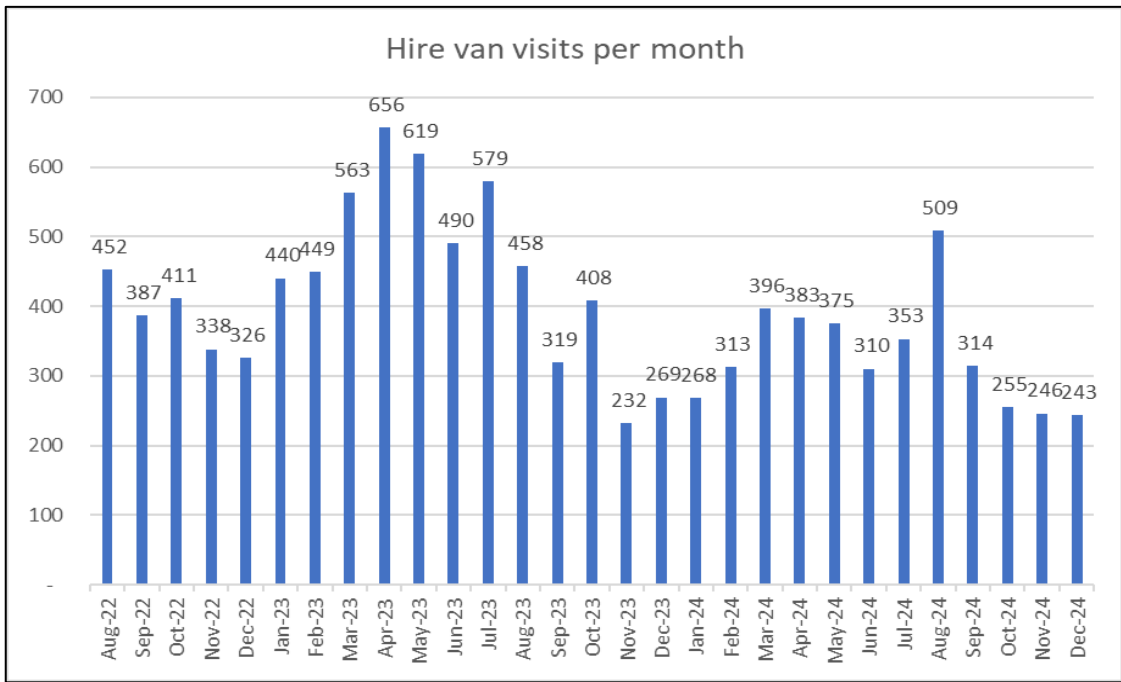


Figure 6: hire van usage of the HWRCs

## 2.2. HWRC Tonnages

The volume of data that emerges from HWRC services is huge, but we can pull out some significant highlights to assess the impact of the Policy.

One would expect HWRC waste arisings to reduce as visit numbers reduce – Figure 7 below shows that that is indeed the case and tonnages clearly track HWRC usage.

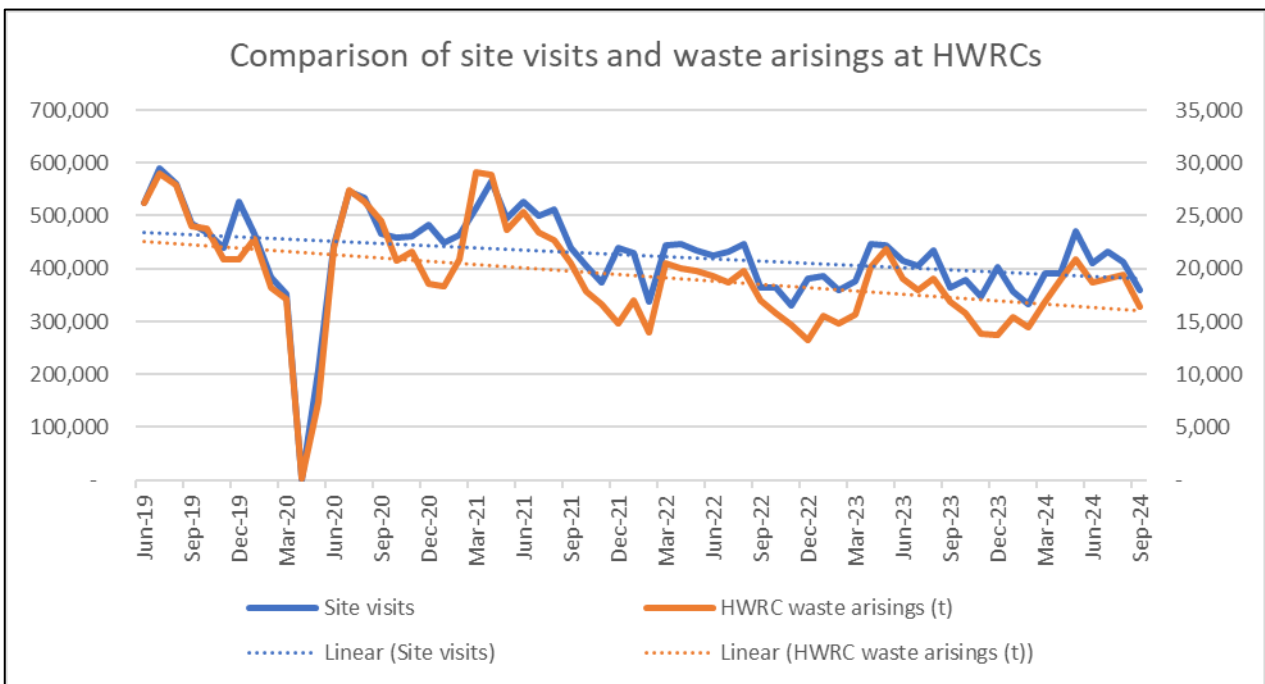


Figure 7: comparison of HWRC visit numbers and the HWRC waste arisings (with trendlines)

Another interesting aspect to test is whether the reduction in van (and suspected trader) visits results in a change to the recycling rate at HWRCs.

Figure 8 below presents this analysis.

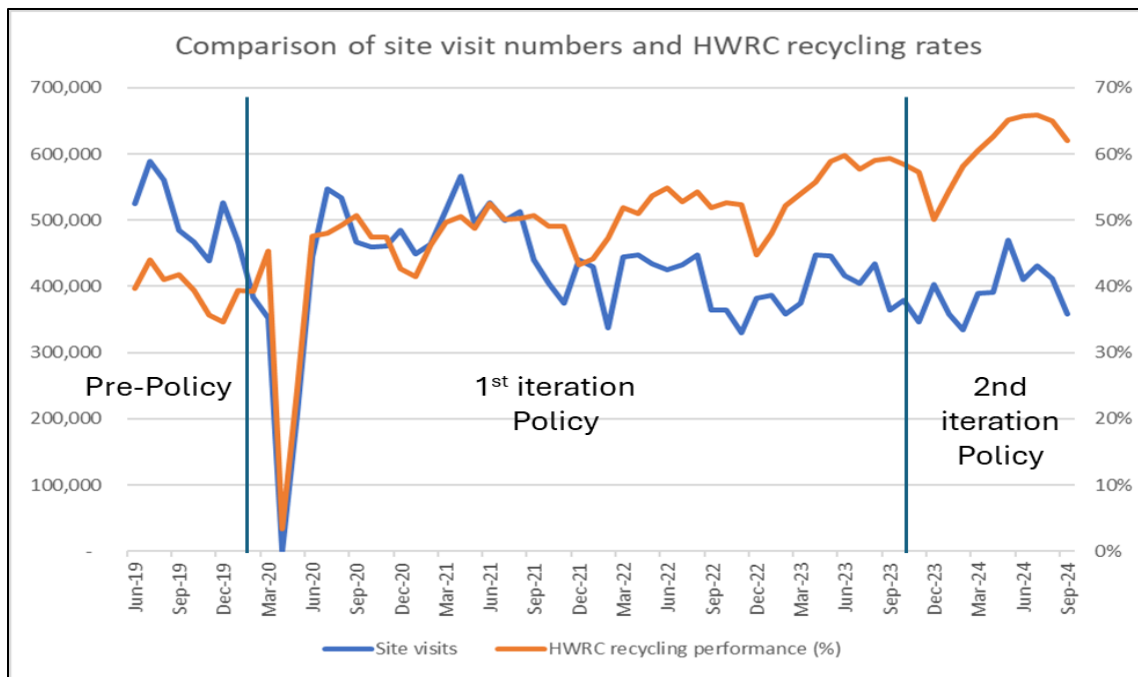


Figure 8: comparison of HWRC visit numbers and the HWRC recycling performance

Since contracts commencement there have been significant improvements in recycling at the HWRCs (as the graph shows). These have happened independently of the Access Policy and Van Permit Scheme so it is difficult to attribute any change of performance with changes in visitor numbers/types. One observation is that recycling rates have increased between each Policy phase as shown in the figure.

Finally, attempting to map the introduction and development of the Access Policy and the Van Permit Scheme on to changes in HWRC arisings. A basic analysis of monthly arising and the phases of the Policy is shown in Figure 9 below.

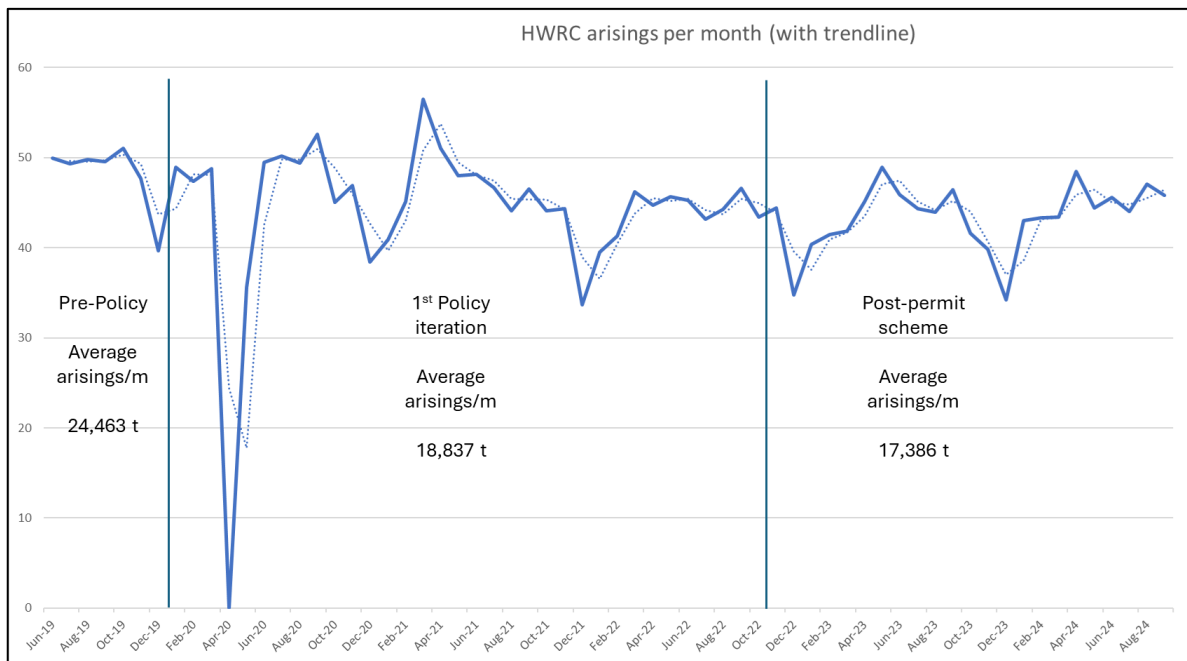


Figure 9: comparison of HWRC visit numbers and the HWRC recycling performance

This analysis suggests that the introduction of the first version of the Access Policy resulted in a reduction of just over six thousand tonnes per month (but this is based on a limited number of months so should be treated with caution). The subsequent revision of the Policy coming into effect in December 2023 saw a reduction of 1,500 tonnes per month on average.

### **2.3. Complaints and Comments received by the GMCA**

Complaints are reported to the GMCA on a monthly basis and categorised according to subject or service area. Figure 10 below provides a summary of complaint numbers in the run up to the introduction of the permit scheme in the autumn of 2023. The period of the original announcement of the introduction of the scheme and then implementation covers August 2023 to December 2023.

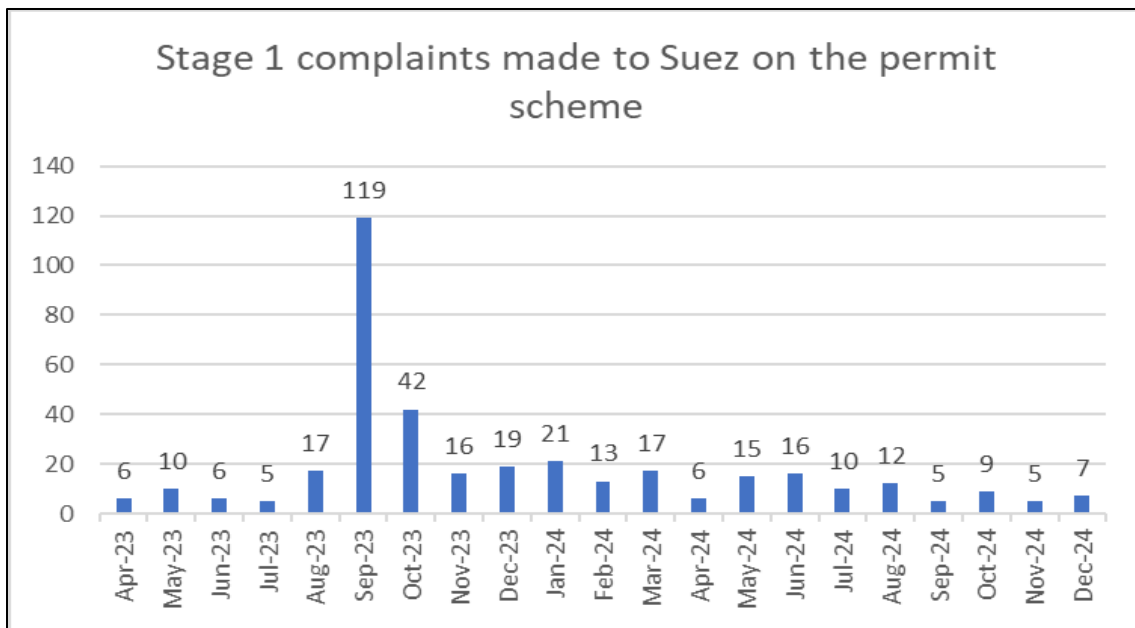


Figure 10: Can permit complaint numbers

During the announcement and implementation period complaints increased significantly above the background amount (around 7 complaints per month) spiking at 119.

Complaint subjects varied – many objected to the introduction of the permit scheme in principle. However, another significant number related to the exclusion of vehicles greater than 5.3 metres in length and the Service does not believe the length limit needs to be changed especially now it seems to be accepted.

Another reasonable proportion of the complaints related to the procedure for hire vans. As Figure 6 above shows many residents understand the permit scheme reflected in the numbers of hire van permits issued. The Service continues to promote the need to apply for a permit when hiring a van (and be mindful of site restrictions).

A smaller number of complaints related to the re-direction of pick-ups to designated HWRCs. Such complaints now are minimal if any at all.

It should be noted that since the autumn of 2023 complaint numbers have returned to the pre-scheme baseline figure. Given there are in the region of 400,000 site visits each month, this complaint level is extremely low.

One particular complainant did ask for his complaint to be raised during the review. The complaint (a retired safety practitioner) had made his own trailer from a caravan chassis with box sides and anchor points welded and bolted onto the chassis. The complainant reported it had its own braking system and when attached to his car the combination measured 29.5 feet. He stated he had gone to great lengths to ensure that his trailer is road worthy. On arrival at an HWRC the Suez Operatives refused entry. The terms and conditions of the van

permit scheme do not allow entry for trailers that are not designed and constructed as a trailer – therefore homemade trailers are excluded.

Since the start of the Contracts in 2019 Suez has amassed a photographic library of homemade and unsuitable trailers. Whilst ensuring the roadworthiness of these trailers is not the responsibility of the GMCA we do have a responsibility for the safety of users of our sites. Many of these homemade trailers have visible safety concerns and we concluded that we did not have the resources nor the expertise to undertake roadworthiness checks or understand any testing certification provided by a trailer owner. Therefore, any trailer that appears homemade is refused entry.

This position has not changed and we do not propose changing the terms and conditions in relation to trailers not primarily designed and constructed for the carriage of goods, waste etc.

### **3. Cross-border Usage of GM HWRCs**

In March 2024 Cheshire East Council (CEC) announced the temporary closure of three of its seven HWRCs (although it was announced much earlier and later confirmed as permanent) due to come into effect in June 2024. In August 2024 the sites actually closed. Two of these sites (Bollington and particularly Poynton) could be considered to be within the catchment areas of GMCA HWRCs in the southern part of area. As a consequence, Suez were asked to step up user checks and monitor visitor numbers closely at the Longley Lane, Rosehill, Adswood and Bredbury HWRCs.

The step up in checks did result in complaints from site users – either directly to GMCA or to Suez. When related to residency checks some complainants residing in Cheshire East stated they believed they were entitled to use GMCA sites and had always done so (especially if they hailed from areas such as Disley where a GMCA facility was already closer than a CEC site) or had used facilities since the closure of (for example) the HWRC in Wilmslow in the early 2000s. Others believed they were entitled to use their next closest facility – some being ours – irrespective of which local authority area they lived in.

Analysis of visitor numbers has only seen a small increase in usage at the Adswood HWRC near Cheadle Hulme year on year (see Figure 11).

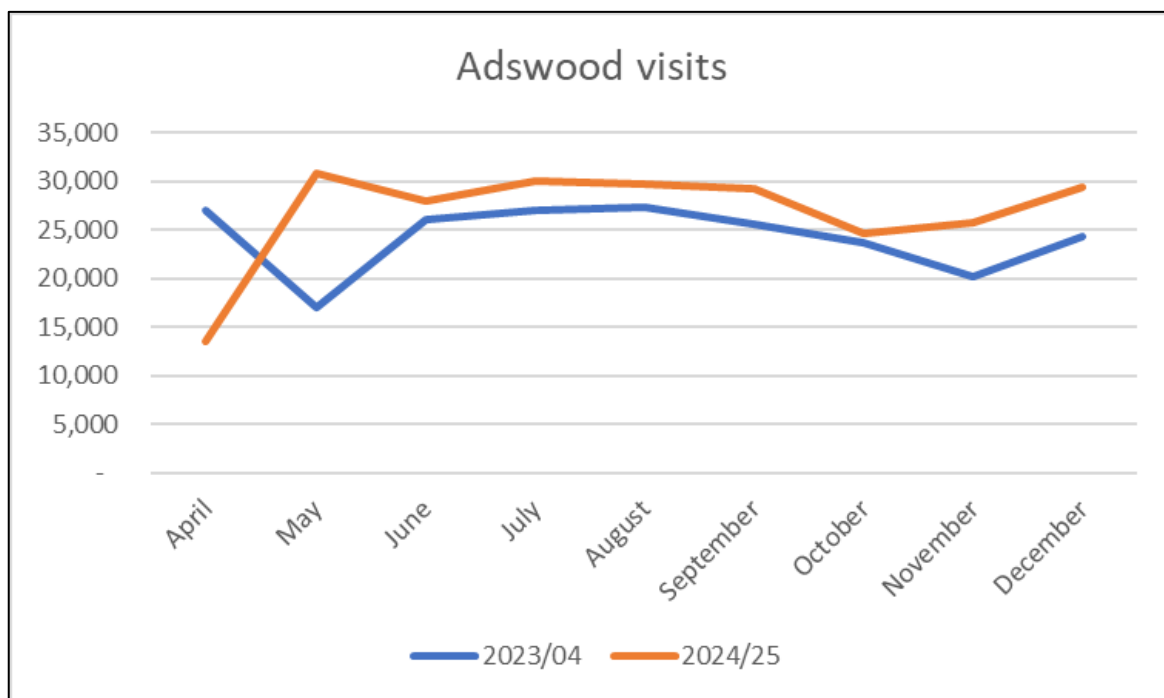


Figure 11: Comparison of usage of the Adswood HWRC

Suez continues to monitor visitors, but it is known that information has been distributed on social media that helps out-of-area users to get round residency checks. If the problem worsens and/or contributes to resourcing issues it will be revisited to see if there are further measures that can be taken to manage cross border tipping.

It must be noted that at the time of writing, Warrington Borough Council announced the closure of a household waste recycling centre in Stockton Heath. This may have a knock-on impact on Altrincham’s Woodhouse Lane HWRC.

#### 4. Conclusions and Recommendations

It is clear that the Access Policy and the accompanying Van Permit Scheme continues to significantly address the issues highlighted in the opening of section 2 above so from that respect it can be considered a success.

On site user visit allocations – the ANPR data strongly indicates that 52 visits per year for a car user is more than enough to fulfil their requirements. It is unclear why a householder who owns a van but state it is their only means of transport and they confirm they are not traders visit HWRCs more often than a car user. Having said that the permit scheme is controlling the visits.

On the direction of pick-ups to designated HWRCs – this was a small source of complaints at the start but is no longer raised. Equally, complaints about the vehicle length restrictions have also reduced significantly.

Based on the analysis of complaints and outcomes, no changes to Access Policy or the Van Permit Scheme and its terms and conditions are recommended.