Cambridgeshire County Council
County Planning, Minerals and Waste

Guidance on Waste Audit and Management Strategies for submission in support of a planning application or to fulfil a requirement of a planning condition

1.0 When is a Waste Audit and Management Strategy needed?

1.1 A Waste Audit and Management Strategy (WA&MS) is one of the documents that Cambridgeshire County Council (CCC) has included on its Local Validation List (LVL). This means that in some cases a planning application will not be valid and will not, therefore, be registered without one. The current LVL was endorsed by the County Council’s Planning Committee on 4 June 2013. Responsible management of waste will contribute to one of the Council’s strategic objectives which is to reduce negative impacts on the environment. CCC, as the County Planning Authority (CPA) will require the submission of a WA&MS with planning applications for development proposals:

i) that involve demolition of a building or part of a larger building

ii) where the development site is previously used (brownfield) land that may be contaminated

iii) that involve significant earthmoving (including greenfield sites)

1.2 It is good practice to discuss your development proposal with the planning officer at an early stage. The document entitled Procedure for submitting a planning application: guidance for applicants, their agents and the planning authority dated April 2013 sets out the CPA’s protocol for doing so. At the first meeting with the planning officer it should be possible to establish whether or not a WA&MS will be a Local Validation List requirement for your scheme. It is important that you are aware of such requirement at an early stage in the process to ensure that an appropriate member of your team is charged with producing the WA&MS and to ensure consistency with, and draw from, other documents that will form part of or accompany the planning application eg the Sustainability Statement, the Design & Access Statement or drawings showing the arrangements for contractors during the construction phase(s).

1.3 The CPA will not usually require a WA&MS to be submitted with planning applications for projects that are entirely new-build (unless in categories ii or iii of 1.1 above). In such cases it is expected that developers will conduct the project in accordance with the Site Waste Management Plan Regulations 2008 (SI No 314).

1.4 The WA&MS produced at the planning application stage (or in compliance with a planning condition) will not be the same document that you are obliged to produce for projects over a certain value under the 2008 Regulations although it is expected that the one should inform the other. It is unlikely that using one of the templates promoted for compliance with the 2008 Regulations will provide the information that the CPA is seeking.
2.0 How to set out and implement a Waste Audit and Management Strategy

2.2 The CPA needs developers to demonstrate with evidence:

- how much and what type of waste the project will generate;
- what steps they have taken or will take to reduce the amount of waste that will be taken off site for recycling or disposal; and
- how they will re-use or manage waste on site.

3.0 Content of the WA&MS

3.1 The following are the areas that the CPA expects developers to address in a WA&MS submitted as part of a planning application (or to fulfil a planning condition)

- Site selection (where applicable)
- Site remediation (where applicable)
- Design
- Construction methods

Some will be more or less relevant depending on the nature and size of the site and the project. The WA&MS should be guided by the principles of the waste hierarchy:

- Prevent
- Minimise
- Reuse
- Recycle
- Dispose

3.2 Site selection

3.3 **Prevent / minimise** It is acknowledged that in most cases (extensions or redevelopment schemes) the site (usually a school) has already been selected. However, where alternatives were considered their relative merit in terms of waste generation and potential re-use should be assessed. Even within a predetermined site there may be options which will generate more or less or different types of waste.

Example: a green field site may not generate demolition material but may give rise to a large quantity of soil which it may or may not be possible to use on site.

Example: you may decide not to develop a small area of contaminated land, perhaps a garage area, if an alternative is feasible.

3.4 Site remediation

**Prevent / minimise** Is *in situ* remediation of contaminated land feasible instead of what is commonly known as “dig and dump” ie disposal at a landfill site? If so, what techniques will be used?
3.5 Design

Are there any elements of the design that minimise the amount of waste that will be generated?

Examples:

- build at level or use cut and fill exercise to minimise waste generated
- ground improvement techniques eg soil stabilisation (improvement of soil engineering properties with the addition of cement/lime) instead of removal and replacement with fill
- use of pre-fabricated components

Are there any elements of the design that include the reuse of waste generated by the development? For example:

Examples:

- phasing the development so that waste can be re-used on site where possible
- reusing inert excavated materials as fill or soil in landscaping on site
- reusing inert excavated materials at other sites
- reusing any salvageable bricks or roof tiles
- crushing hardcore for use as unbound engineering fill, substrate for areas of hard landscaping; pipe bedding; sub-base for access roads and structures
- reusing chipped wood waste in paths or mulch in soft landscaping
- relocation of immature trees as part of the soft landscaping scheme or given to the local community for re-use elsewhere.

Are there any elements of the design that include the reuse of waste generated elsewhere?

Examples:

- use secondary or recycled rather than virgin aggregates
- reuse of inert excavated materials surplus from other sites

3.6 Construction methods

Examples:

Reduce
- use of displacement piles to reduce the amount of spoil produced

Reuse
- hardstands and demolition waste crushed on site for use as temporary haul roads
- unwanted serviceable furniture offered for reuse
- steel framed building removed by hand for reuse
- reusing timber for temporary structures eg racking and fencing
Recycle
- full soft strip prior to demolition to maximise segregation and amount of
  material that can be recycled

4.0 Demolition waste

4.1 It is essential that you demonstrate that you know how much of each type
of waste the project will give rise to and how you have considered re-use on
site before removal off site for either recycling or disposal. You should
quantify the amount of each type of waste in tonnes, m3 or for discrete units
number (eg fluorescent light tubes) and estimate how much you propose to
re-use on site. It is likely that demolition of a building will give rise to materials
in most of the following categories and maybe others:

- bricks
- asphalt
- rubble/hardcore
- natural stone
- concrete (including pipes, kerb stones, paving slabs, solid blocks)
- ceramics (including ceramic tiles, clay roof tiles, ceramic toilets & sinks)
- timber (including plywood, chipboard, noggins, battens, doors & window
  frames, MDF)
- glass
- metals (including radiators, metal formwork, acrows, metal sinks, cables &
  wires, metal bars, gutters & downpipes, some furniture)
- plastic (including gutters & downpipes, DPC, PVC-U window frames &
  doors, socket boxes)
- insulation materials (non-hazardous including glass fibre, mineral wool,
  purlboard, breather board)
- asbestos (hazardous)
- gypsum-based (plasterboard, plaster)
- cement, render, mortar, fibre cement sheets
- textiles (including carpet, curtains, some furniture)
- fluorescent light tubes & other hazardous materials
- electrical equipment (including air conditioning units)
- trees and other vegetation

4.2 There will, of course, be other wastes from the construction element of
the project such as liquids, oils and packaging which will also need to be
managed on site.

5.0 On-site waste management

5.1 It is acknowledged that undertaking works when a school is occupied
may place constraints on some waste management techniques but on large
sites one or more of the following may be appropriate:

- on-site crushing and/or screening of hardcore
- compactor for packaging waste
- wood chipper for timber waste
- shredder for landscape waste
5.2 It is acknowledged that the majority of demolition waste will need to be removed from the site. The quantity of each type of waste should be calculated and the strategy for how it will be managed on site clearly set out. The phasing of the demolition and new build will be important in identifying an area or areas for waste management. The aim should be to facilitate re-use or recycling and this can be most effectively achieved by segregation. This is most likely to involve a larger number and greater variety of skips that would have been the case when completely mixed loads were the norm.

5.3 It is essential that you plan for the material handling areas and areas for skips and recycling at all stages of the development. This should be shown on a plan (to a recognised and readable scale) or series of plans if there is more than one phase of development. You will, therefore, need to know how many of each type and size of skip that you will need at any one time. The size, location and duration of waste management areas is an important land use planning consideration in terms of environmental impact and residential amenity. If it is necessary to include such an area outside the boundary of the premises or development site it must be included in the planning application boundary. If a new, albeit temporary, access onto the public highway is to be created the Highway Authority will need to assess its safety.

5.4 It is recognised that these matters are customarily left to the contractor to determine, often after planning permission has been granted. This has in the past led to two problems:

- an insufficient or inappropriate area being left for the site compound where it is anticipated that most waste management will take place; and
- insufficient time to agree an acceptable arrangement before the project commences.

5.5 It is for these reasons, as well as the desire to promote the re-use of waste, that the CPA wishes to see a WA&MS at the planning application stage. It is acknowledged that changes to the waste management regime may become necessary as the development progresses and the CPA will build in some flexibility by including the plan(s) showing the contractors’ and waste management areas in the list of approved drawings. Non-material changes can be agreed by means of an application under s96A (see guidance note referred to at 2.1 above).

5.6 It is the responsibility of the developer to identify any changes to the approved waste management regime in sufficient time to seek the CPA’s agreement for them to be modified. A justification for the proposed changes should be provided and the CPA will aim to consider the request within 5 working days.

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