OCTOBER 2025

Site Waste Management Strategy

Hayes Park West, Hayes Park, Uxbridge, UB4 8FE

Iceni Projects Limited on behalf of
Shall Do Hayes Developments Ltd

October 2025

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Site Waste Management Strategy
HAYES PARK WEST, HAYES PARK, UXBRIDGE, UB4 8FE

Iceni Projects
London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH
Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham, B4 6AT
Edinburgh: 14 – 18 Hill Street, Edinburgh, EH2 3JZ
Glasgow: 201 West George Street, Glasgow, G2 2LW
Manchester: WeWork, Dalton Place, 29 John Dalton Street, Manchester, M2 6FW

t: 020 3640 8508 **| w:** iceniprojects.com | **e:** mail@iceniprojects.com
linkedin: linkedin.com/company/iceni-projects | **twitter**: @iceniprojects

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1. INTRODUCTION

1.1 This Site Waste Management Plan (SWMP) has been prepared by Iceni Projects Ltd on behalf of Shall Do Hayes Developments Ltd ('the Applicant') to accompany the planning application for the proposed residential development (the 'Proposed Development') of Hayes Park West, Hayes Park, Uxbridge, UB4 8FE. The purpose of this SWMP is to set out how construction and excess material waste will be managed by the Applicant in relation to the redevelopment of the Site, and has been based on the information available at the time of writing. This document provides a summary of:

- How the Applicant has developed the SWMP during the design stage.
- How waste will be managed on-site in line with Duty of Care legislation.
- The Applicant's requirements for training on waste management issues.
- The Applicant's responsibilities for updating monitoring and reporting volumes of waste.

1.2 It is anticipated that this SWMP will be a will be a condition of the planning permission and that it will be a living document, regularly monitored and updated with the relevant information as and when it becomes available through each stage of the project.

1.3 Prior to the commencement of construction works, the Applicant is responsible for preparing a SWMP. At the pre-construction stage, the Applicant should enter the following information into the plan, where practicable:

- Project Details and Duty Holders.
- Objectives relevant to the project.
- Inception and Design Decisions taken to eliminate and reduce waste generation.
- Proposed Waste Management Actions to reduce the amount of waste generated.
- Completion of a waste data sheet at the tender stage, describing the type and quantity of waste likely to be generated throughout the project and how that waste will be treated, reused, recycled, etc.

1.4 When the Principal Contractor is appointed, the Applicant will hand the SWMP over to the Contractor. The Contractor must then update the plan to include the following throughout the course of the project:

- The name of the Site Manager; the person responsible for implementation of the SWMP.

- Recording the details of all contractors to work on the project and any specific responsibility they have in relation to the SWMP.
- Details of the waste contractors to be employed.
- Completion of the document register, detailing the records kept in order to prove compliance with environmental legislation.
- Any waste management action taken, in addition to those proposed by the Applicant to reduce the amount of waste generated.
- Production of updated waste data sheets as often as necessary, but at least every 6 months.
- Details regarding how and where waste will be separated and stockpiled on-site and any security measures that will be implemented to prevent illegal disposal.
- Details of any training that will be provided to ensure adherence to the SWMP.
- The type and frequency of any measuring or monitoring that will be carried out.

Project Details

Project Information

1.5 Table 1.1 below provides the key project information available at this stage, including the proposed Gross Internal Area (GIA).

Table 1.1 Key Project Information

Applicant	Shall Do Hayes Developments Ltd
Employers Agent	*TBC*
Principal Contractor	*TBC*
Principal Designer	SEW (up to RIBA Stage 2 design)
Site Location	Hayes Park West, Hayes Park, Uxbridge, UB4 8FE Grid Reference: TQ088825
Proposed GIA (m^2)	7,348.64
Start Date	*TBC*
Completion Date	*TBC*
Description of Project	Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works.
Waste Management Champion	*TBC*
SWMP Owner	*TBC*

Site and Surroundings

1.6 The Site, known as Hayes Park West, is located within the Charville Ward of the London Borough of Hillingdon. The Site sits within a wider former business park known as 'Hayes Park'.

1.7 The Hayes Park estate comprises a historically significant office campus in West London, situated in Hayes, and bounded by a structured, pastoral landscape. The estate is framed by the buildings known as Hayes Park North ('HPN'), Hayes Park Central ('HPC'), and Hayes Park South ('HPS'), both positioned within a broader landscape setting originally envisaged by architect Gordon Bunshaft as a modernist business park set in parkland. HPC and HPS are Grade II* listed due to their architectural and historic interest.

1.8 In recent years, the character and context of Hayes Park estate has undergone a fundamental shift from office use to residential, which following a series of planning applications is delivering 189 new homes. The relevant applications are as follows:

- Hayes Park North ('HPN') – a three-storey, early 2000s office building, was granted Prior Approval in 2022 for conversion to 64 homes (Ref: 12853/APP/2021/2202), followed by

permission for external enhancements to the building (Ref: 12853/APP/2023/3720). These works are now on-site and being delivered.

- Hayes Park Central ('HPC') and Hayes Park South ('HPS') – both mid-century, listed office buildings, were granted full planning permission and listed building consent in early 2024 for conversion into 124 homes, with associated landscape enhancements (Ref: 12853/APP/2023/1492).

1.9 Hayes Park West is bound to the north and west by dense trees planting and open parkland, which is private land owned by the Church Commissioners. To the east the site is bound by HPN, and to the south by the listed HPC and HPS.

1.10 The entirety of the site and much of the surrounding land is located within the Green Belt. Beyond that, there are large areas of low-density terraced housing. There is a wide selection of parks and leisure facilities in the area, including the Hayes End Recreation Ground, Park Road Green and the Belmore Playing Fields. The nearest town centres are located at Hillingdon Heath Local Centre, 1.6km to the southwest, and at Uxbridge Road Hayes Minor Centre, 3.3km to the southeast.

The Proposed Development

1.11 The description of the Proposed Development is as follows:

> *"Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."*

1.12 The Proposed Development will deliver the following mix of residential dwellings:

- 16no. 1-bedroom units; and
- 36no. 3-bedroom units.

2. OBJECTIVES

2.1 The objectives of this Site Waste Management Plan are to:

- Identify relevant policy and guidance that needs to be considered and supported by the Proposed Development.
- Identify and implement roles and responsibilities of all parties involved in the management of waste.
- Set the waste management principles and aspirations for the construction and operation of the Proposed Development.
- Identify the waste expected to arise during the demolition, enabling and construction phases.
- Implement good practice waste minimisation and management, outlining how waste will be eliminated, reduced, reused and recycled and, if required, disposed of correctly.
- Monitor and review waste minimisation and waste management.

3. WASTE MANAGEMENT REGULATIONS AND GUIDANCE

3.1 The means of mitigating and managing both site and operational waste are incorporated within policy and regulation as set out below.

Legislation and Guidance

Definition of Waste

3.2 Waste is defined by the Council Directive on Waste (75/442/EEC) as “any substance or object which the producer or person in possession of discards, intends to discard or is required to discard.”

Hazardous Waste

3.3 Hazardous Waste is waste with one or more properties that are hazardous to human health or the environment as defined by the Hazardous Waste (England and Wales) Regulations 2005 (HWR).

3.4 Under the HWR “it is an offence to produce hazardous waste at premises, or remove that waste from premises, unless those premises are either registered with the Environment Agency or are exempt.”

3.5 Where subcontractors produce hazardous waste, it will be removed under the Hazardous Waste Premises Registration for that site. The Hazardous Waste (England and Wales) Regulations 2005 require a Hazardous Waste Consignment Note (HWCN) to be produced for each consignment of hazardous waste removed from site.

Inert Waste

3.6 The definition of inert waste (including bricks, tiles and ceramics, concrete, soils and stones and glass), is set out in the Landfill Directive (99/31/EC). It states that: “Waste is considered inert if:

1. It does not undergo any significant physical, chemical or biological transformations;

2. It does not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health;

3. Its total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater.”

Waste Framework Directive

3.7 The revised European Union (EU) Waste Framework Directive was adopted and published in the Official Journal of the European Union in November 2008 (L312/3) as Directive 2008/98/EC. The Directive has established a framework for the management of waste across the EU and aims to encourage reuse and recycling of waste, as well as simplifying current legislation. Since Brexit, the

legal requirements remain largely unchanged, save that references to EU institutions, obligations and targets will be removed.

3.8 The key requirements are:

- Give priority to waste prevention and encourage reuse and recovery of waste.
- Ensure that waste is recovered or disposed of without endangering human health and without using processes which could harm the environment.
- Prohibit the uncontrolled disposal of waste, ensure that waste management activities are permitted (unless specifically exempt).
- Establish an integrated and adequate network of disposal installations.
- Prepare waste management plans.
- Ensure that the cost of disposal in borne by the waste holder in accordance with the polluter pays principle.

Materials Management Plan (MMP)

3.9 The Definition of Waste: Code of Practice (DoWCoP) requires that a Materials Management Plan (MMP) is produced and specifies what information must be gathered and documented. The MMP must demonstrate the material has been deposited in the appropriate manner and will not pose unacceptable risks to human health or the environment. The MMP must be reviewed by a Code of Practice Qualified Person and receive final signoff by the Environment Agency.

Duty of Care

3.10 The Duty of Care is set out in Section 34 (1) of the Environmental Protection Act 1990 and imposes a duty on any person who is the holder of controlled waste. Any persons who import, produce, carry, keep, treat or dispose of controlled waste, or as a broker has control of such waste, safe storage, transfer to the right person and requirement for checking up.

Waste Transfer Notes (WTNs)

3.11 The Environmental Protection (Duty of Care) Regulations 1991 require a Waste Transfer Note (WTN) to be provided on the transfer of waste between parties. The WTN will contain enough information about the waste to enable anyone encountering it to handle it safely and either dispose of it or allow it to be recovered whilst maintaining compliance with law.

3.12 Copies of WTNs must be retained for 2 years minimum and be available for inspection by the environmental regulator following the transfer of waste.

3.13 The Regulations give specific requirements for the content of a WTN, which must:

- Contain a written description of the waste and the corresponding 6-digit EWC reference code.
- State the quantity of waste.
- State whether the waste is loose or in a container, and if in a container, the type of container used.
- State the time and place of transfer.
- State the name and address of the transferor and transferee.
- State whether the transferor is the producer of the waste.
- State to which category of person the waste is transferred to, e.g. a registered waste carrier, or a holder of a waste management licence.
- Provide details of any waste carrier's registration or any waste management licence, where used.

Waste Carrier's Registration (WCR)

3.14 The Control of Pollution (Amendment) Act 1989 establishes the requirement for carries of controlled waste to register with the Environment Agency. There are a number of exceptions to these requirements, including charities, waste collection authorities, and emergency situations.

3.15 Waste will only be removed from site using a subcontractor or supplier holding a valid WCR.

Site Waste Management Plans (SWMPs)

3.16 The legislation[1] mandating the development and implementation of a SWMP on medium and large-scale construction projects was repealed in December 2013. However, many continue to recognise that SWMPs, when correctly implemented, can improve construction waste management with associated environmental and economic benefits.

3.17 A SWMP is an important part of implementing good practice WMM. A SWMP is not just a tool for managing waste on-site, it should also be used as a tool during the early design phase of projects, identifying potential waste streams to minimise and targeting appropriate rates of recovery to inform the development of the design. Planning and developing the SWMP before construction begins greatly helps realise the benefits of good practice WMM.

[1] Site Waste Management Plans Regulations 2008 (Repealed in December 2013).

3.18 SWMPs remain best practice during construction and allow waste credits to be achieved under certification schemes such as BREEAM. It is anticipated that this SWMP will be regularly monitored by the Principal Contractors once appointed.

Construction Environmental Management Plan (CEMP)

3.19 Details of measures to protect the environment during the construction of the Proposed Development are set out in a Construction Environmental Management Plan (CEMP).

3.20 Measures address hours of working, noise, vibration, dust, light spill, wheel washing, control of runoff, and waste management. It is anticipated that the phased implementation of the CEMP will be a condition of the planning permission and that it will be regularly monitored.

3.21 Once finalised and approved by the local authority, the CEMP will be held on-site and all site personnel will be made aware of its existence and adhere to its guidance.

Considerate Constructors Scheme

3.22 This is a national initiative, set up by the construction industry. Construction sites that register with the Scheme sign up and are monitored against a Code of Considerate Practice, designed to encourage best practice beyond statutory requirements.

3.23 The Scheme is concerned about any area of construction activity that may have a direct or indirect impact on the image of the industry as a whole. The main areas of concern fall into three categories: the environment, the workforce and the general public.

3.24 It is expected that registered construction sites work in an environmentally conscious, sustainable manner.

Policy Context

3.25 Regional, local and Applicant environmental policy is outlined below in respect of the Proposed Development.

The London Plan (March 2021)

3.26 The London Plan outlines the Mayor's commitment to creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste, as this is not only socially and environmentally responsible, but will save money and limit the likelihood of environmental threats affecting London's future. The following London Plan policies are relevant to waste:

- **Policy SI7 (Reducing waste and supporting the circular economy)** states that resource conservation, waste reduction, increase in material re-use and recycling, and reductions in

waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- Promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible;
- Encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of goods;
- Ensure that there is zero biodegradable or recyclable waste to landfill by 2026;
- Meet or exceed the municipal waste recycling target of 65 per cent by 2030;
- Meet or exceed the targets for each of the following waste and materials streams:
    - Construction and demolition – 95 per cent reuse/recycling/recovery
    - Excavation – 95 per cent beneficial use
- Design developments with adequate, flexible, and easily accessible storage space and collection systems and that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food waste, as well as residual waste.

- **Policy D6 (Housing quality and standards)** states that housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste, as well as residual waste.

- **Policy T7 (Deliveries, servicing and construction)** states that development proposals should facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

London Environmental Strategy (May 2018)

3.27 The London Environmental Strategy (2018) sets out a vision for improving London's environment. It is noted within the Strategy that, at the time of writing, less than half of the waste generated by London's homes and businesses was recycled. As part of the Strategy, the following objectives are set out with respect to waste:

- Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging waste.

- Maximise recycling rates.
- Reduce the environmental impact of waste activities.
- Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

3.28 In order to achieve the objectives of the London Environment Strategy, a number of targets are set out, as follows:

- Achieve 50% Local Authority collected waste recycling by 2025.
- No biodegradable or recyclable waste to be sent to landfill by 2026.
- Increase recycling rates to achieve a 65% municipal recycling rate (by weight) by 2030.
- Achieve a minimum 75% recycling of business waste by 2030.
- Achieve a 50% reduction in food waste per head by 2030.

Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)

3.29 The Hillingdon Local Plan: Part 1 – Strategic Policies sets out the long-term vision and objectives for the Borough, what is going to happen, where, and how this will be achieved. Policies of relevance to waste management include:

- **Strategic Objective SO13** of the Local Plan is to support the objectives of sustainable waste management.
- **Policy EM11 (Sustainable Waste Management)** states that the Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within the West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan which is 382 thousand tonnes per annum for Hillingdon by 2026.

  The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction. The Council will promote using waste as a resource and encouraging the re-use of materials and recycling. The Council will also support opportunities for energy recovery from waste and composting where appropriate. The Council will safeguard existing waste sites unless compensatory provision can be made.

  The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.

Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020)

3.30 The Hillingdon Local Plan: Part 2 – Development Management Policies provides detailed policies that will form the basis of the Council's decisions on individual planning applications. Policies of relevance to waste management include:

- **Policy DMHB 11 (Design of New Development)** states, in part, that development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

- **Policy DMIN 4 (Re-use and Recycling of Aggregates)** states that the Council will promote the recycling of construction, demolition and excavation waste. All developments will be encouraged to:

    - Recycle and re-use construction, demolition and excavation waste as aggregates;

    - Process and re-use the recyclable material on-site, and where this is not possible, the material should be re-used at another site or for land restoration; and

    - Use substitute or recycled materials in new development in place of primary materials.

British Standard 5906:2005

3.31 The Standard, which applies to new buildings, refurbishments and conversions of residential and non-residential buildings, provides a code of practice for the storage, collection, segregation for recycling and recovery, and on-site treatment of waste. This includes the following:

- All containers for waste, including recyclable material, are easily accessible to both the occupier and waste collector;

- Collectors will not have to manoeuvre waste storage containers from the storage areas to the collecting vehicles for a distance of more than 10m (four wheeled bins) or 15m (two wheeled bins);

- Paths between storage areas and collecting vehicles are free from steps, kerbs or inclines with a gradient of more than 1:12, be non-slip and a minimum of 2m wide. They will have foundations and a hardwearing surface that will withstand the loading imposed by wheeled containers;

- Waste stores have been designed and located in such a way as to limit potential noise disturbance to residents;

- Storage areas for waste and recycling will be clearly designated for this use only, by a suitable door or wall sign and, where appropriate, with floor markings;

- Waste storage sites will include areas for instructional signage detailing correct use of the facilities;
- The entrance of the waste storage room will be free from steps and projections;
- Adequate ventilation will be provided, with permanent ventilators giving a total ventilation area of no less than 0.2m2;
- Electrical lighting will include sealed bulkhead fittings (housings rated to IP65 in BS EN 60529:1992 (Ref. 43)) for the purpose of cleaning down with hoses and inevitable splashing. Luminaires will be low energy light fittings or low energy lamp bulbs, controlled by proximity detection or a time delay button to prevent lights being left on; and
- Gullies for wash down facilities will be positioned so as not to be in the track of container trolley wheels.

3.32 The Standard also presents typical weekly waste arisings and subsequent storage requirements for a variety of building types, as shown below:

Table 3.1 Waste volume calculations

Building Type	Equation for weekly waste arisings (litres)
Domestic	Number of dwellings x {(number arising per bedroom (70l) x average number of bedrooms) +30}*
Office	Volume arising per employee [50 l] x number of employees
Shopping centre	Volume arising per sqm of sales area [10 l] x square meterage
Fast food outlet	Volume per sale [5 l] x number of sales
Department store	Volume per sqm of sales area [10 l] x sales area
Restaurant	Volume per number of covers [75 l]
4/5 star hotel	Volume per bedroom [350 l] x number of bedrooms
2/3 star hotel	Volume per bedroom [250 l] x number of bedrooms
1 star hotel / B&B	Volume per bedroom [150 l] x number of bedrooms
Supermarket (small)	Volume per sqm of sales area [100 l] x sales area
Supermarket (large)	Volume per sqm of sales area [150 l] x sales area
Industrial unit	Volume per sqm of floor area [5 l] x floor area
Entertainment complex / leisure centre	Volume per sqm of floor area [100 l] x floor area

* Based on average household occupancy.

4. ROLES AND RESPONSIBILITIES

Overview

4.1 The table below identifies the various parties involved and their responsibilities in relation to the SWMP.

Table 4.1 Roles and Responsibilities

Party	Role and Responsibility
Principal Contractor	• Production and distribution of the SWMP • Implementation of the SWMP • Appointment of Waste Contractor for removal of waste and off-site segregation and recycling • Auditing and reporting of site performance against the SWMP • Updating of the SWMP to reflect any changes of responsibilities or personnel • Recording of the quantities of materials being delivered to the Site • Recording of the quantities of materials being removed from the Site for recycling • Recording of all training held in respect to waste management • Ensuring all records are maintained on-site • Retention of report for 2 years after project completion
Waste Contractor	• Provision of waste containers and equipment • Recording of the quantities of waste removed from the Site • Collecting, transporting and disposing of waste for re-use, recycling, recovery or disposal • Providing waste transfer notes • Providing monthly waste reports
Subcontractors	• Attendance of training as directed by the Principal Contractor • Following arrangements for the collection and segregation of waste on-site as specified in the SWMP • Contacting the Principal Contractor if they are unclear about any aspect of waste or waste management on-site

4.2 All persons working on-site are responsible for adhering to the SWMP. This includes attending training as specified and following arrangements for the movement and segregation of waste on-site.

Principal Contractor

4.3 The Principal Contractor shall distribute copies of the SWMP to the Principal Designer, Applicant and each Subcontractor. This will be undertaken every time the plan is updated.

4.4 They will ensure that an appointment is in place with a registered Waste Management Contractor.

4.5 The Principal Contractor will also carry out regular auditing and reporting of how the project is performing against the Site Waste Management Plan.

4.6 The Principal Contractor will also be responsible for the implementation of the SWMP.

4.7 Their duties will include, but are not limited to:

- Ensuring waste is managed on-site in accordance with the SWMP. This includes ensuring appropriate segregation of waste on-site and arrangements for the removal of waste from the Site.
- Ensuring all employees and contractors understand their duties in relation to the SWMP. This includes arranging appropriate training and toolbox talks.
- Ensuring that all required records and documents are filed and retained.
- Ensuring compliance with Duty of Care and other relevant legislation. The Site Manager will be the point of contact for all employees, contractors and waste contractors in relation to the SWMP.

4.8 It is recommended that the Principal Contractor nominates a “Waste Champion” on-site to be responsible for the daily management, monitoring and enforcing of waste and also co-ordinating pickup times with the waste management companies. The Waste Champion should also ensure that skips do not become contaminated by incorrect waste being placed in them.

4.9 The Principal Contractor’s Procurement Lead is responsible for working with the SWMP Owner to ensure that all waste management requirements and targets are included in subcontract procurement packages. The Procurement Lead is also responsible for ensuring the Waste Management Contractor appointed for use on the project are registered Waste Carriers and have valid and verifiable registration documents.

Waste Management Contractor

4.10 The Waste Management Contractor will be responsible for recording the amount of waste taken off-site. They will also provide suitable waste containers, equipment and personnel as necessary to meet the requirements set out in the SWMP as well as produce documents and keep records as required.

4.11 They will be responsible for removing waste off-site and transporting to a licensed waste management facility.

4.12 The Waste Contractor is responsible for ensuring waste is managed off-site as specified in the SWMP and ensuring the waste treatment facilities have a waste licence and that records are provided to the Principal Contractor.

4.13 The Waste Contractor's details are listed below:

Table 4.2 Waste Contractor Details

Contractor	Contact Details	Licence Number and Expiry Date
TBC	*TBC*	*TBC*

Subcontractors

4.14 Subcontractors are expected to ensure compliance, to adhere to the principals and site practices described in this SWMP, to attend training sessions and to contribute to the achievement of the SWMP targets as necessary.

4.15 The subcontractors are yet to be confirmed. This SWMP will be updated and revised as information becomes available. All contractors will be listed in the following table with contact details. All contractors are responsible for adhering to the SWMP.

Table 4.3 Subcontractor Details

Package	Subcontractor	Contact Details
Piling	*TBC*	*TBC*
Groundworks	*TBC*	*TBC*
Frame	*TBC*	*TBC*
Façade	*TBC*	*TBC*
Roofing	*TBC*	*TBC*
Brick / Blockwork	*TBC*	*TBC*
Drylining	*TBC*	*TBC*
Joinery	*TBC*	*TBC*
MEP	*TBC*	*TBC*
Screed	*TBC*	*TBC*
Kitchens	*TBC*	*TBC*
Bathrooms	*TBC*	*TBC*
Floor Finishes	*TBC*	*TBC*
Metalwork	*TBC*	*TBC*

Package	Subcontractor	Contact Details
Painting and Decorating	*TBC*	*TBC*
External Works	*TBC*	*TBC*

Key Personnel Contact Details

4.16 The table below provides the contact information of key personnel in relation to the SWMP.

Table 4.4 Key Personnel Contact Details

Role	Name	Address	Telephone	Email
Applicant	Shall Do Hayes Developments Ltd	c/o Marson Property Ltd, 15-16 Margaret Street, London, England, W1W 8RW	*TBC*	*TBC*
Principal Contractor	*TBC*	*TBC*	*TBC*	*TBC*
Principal Designer	SEW (up to RIBA Stage 2 Design)	Studio 3, Brewhouse Yard, London, EC1V 4JQ	*TBC*	*TBC*
Operations Director	*TBC*	*TBC*	*TBC*	*TBC*
Waste Management Champion	*TBC*	*TBC*	*TBC*	*TBC*
Document Controller	*TBC*	*TBC*	*TBC*	*TBC*

5. WASTE MANAGEMENT PRINCIPLES

5.1 As defined above, waste is “any substance or object which the producer or person in possession of discards, intends to discard or is required to discard”. Construction, demolition and excavation (CD&E) generated around three fifths (62%) of total UK waste in 2018[2].

5.2 Implementing good practice Waste Minimisation and Management (WMM) on construction projects will help reduce the amount of construction waste sent to landfill. Waste minimisation includes designing out waste from a project and limiting waste arising in the construction phase. Waste management involves identifying potential waste streams, setting target recovery rates and managing the process to ensure these targets are met. Good practice WMM is increasingly being implemented in construction projects to realise key benefits. The following principles are the pillars of WMM.

Circular Economy Principles

5.3 As specified under London Plan Policy SI7, the principles of circular economy should be at the core of the Proposed Development. The CE can be defined as “…one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste[3].” The six circular economy (CE) principles, which should be fundamental throughout both detailed design and construction works, are:

1. Building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary.

2. Designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials.

3. Designing for longevity.

4. Designing for adaptability or flexibility.

5. Designing for disassembly.

6. Using systems, elements or materials that can be reused and recycled.

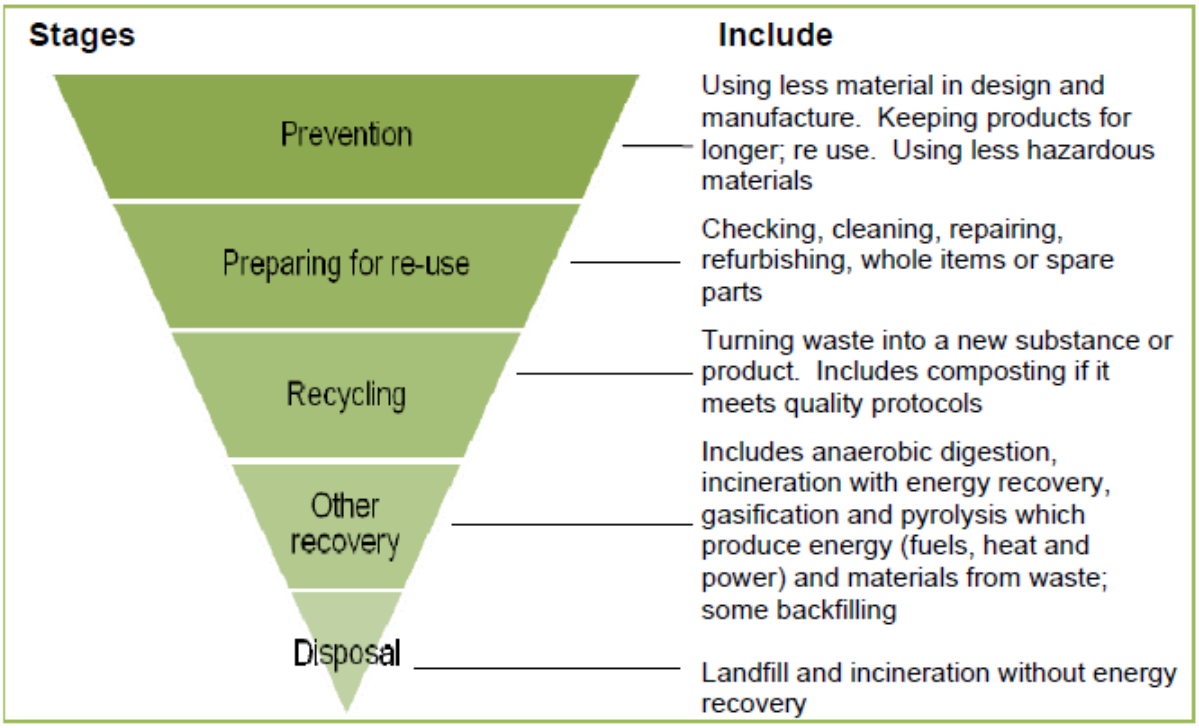
[2] Gov.uk. (2022). Statistics on waste. Available at https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste

[3] Mayor of London. (2022). London Plan Guidance: Circular Economy Statements.

Waste Hierarchy

5.4 The waste hierarchy is displayed in Figure 5.1 below. The hierarchy orders waste management options according to what is best for the environment. Consideration of how to manage waste should be carried out in this order.

Figure 5.1 The Waste Hierarchy



5.5 Waste management needs to consist of a holistic approach during the design, contractual and construction phases. This should involve the Applicant, designers, contractors and any other relevant parties. Each party can take actions to reduce the amount of waste arising at different stages of a development.

Prevent / Reduce Waste

5.6 The following items are to be taken into account by the Applicant / Designers in relation to the design or the construction method in order to minimise the quantity of waste produced on-site:

- Design the project to suit component sizes.
- Reduce the need for temporary or false works.
- Structural solutions which minimise materials and simplify the structure.
- Set the level of the building to minimise export of spoil.
- Plan for the re-use of spoils to form landscape features.

5.7 The following actions will be taken by the Principal Contractor in order to reduce the amount of waste generated throughout the project:

- Order the correct materials, as specified.
- Order the correct quantity of materials.
- Deliver materials at the appropriate time (just in time delivery).
- Encourage suppliers to use less packaging.
- Store and handle materials correctly.
- Ensure protection of finished works.
- Follow the suppliers' storage instructions.
- Keep harmful chemicals in secure bunded areas.
- Protect lightweight materials from wind.

Re-Use Materials

5.8 Where possible, surplus materials should be re-used on the Site. Where materials are surplus to requirements on-site (such as soils), there may be a requirement for them to be recovered off-site at other projects. Materials can be sold on by the Principal Contractor, or donated.

Recycling Waste

5.9 Wherever possible, waste will be segregated before being removed from the Site, with skips and bins clearly labelled. This prevents specific waste streams from becoming contaminated and ensuring they are ready for recycling. However, due to the limited storage area on typical construction sites, a general waste skip may be used for all waste generated (other than Gypsum products) and separation will be carried out off-site at a Waste Transfer Station. Waste will either be diverted for reuse or recycling or disposed of at landfill.

5.10 It is critical that waste separation is relayed to the Site Manager by the operators of the Waste Transfer Station in order to ensure that accurate data is recorded in the SWMP. Where possible, smaller waste materials, such as that from the canteen and the office, should be segregated and recycled separately at the nearest Local Civic Amenity point or other recycling centre. This is to include the recycling of plastic, paper, cardboard, cans and other waste.

Waste to Landfill

5.11 This is a last resort option. Landfill disposal is expensive, and it is accompanied by high disposal costs in the Landfill Tax.

6. WASTE TYPES, QUANTITIES AND TARGET SETTING

Construction Stage Waste Targets

6.1 Waste related targets for the Site will be set by the Applicant. Overall construction and operational waste targets will be set, as well as specific targets developed for each waste stream. These are specified in the section below.

6.2 The following targets will be set:

- Construction and demolition waste – 95% reuse/recycling/recovery.
- Excavation waste – 95% beneficial use.
- Incorporate an effective incident reporting system to reduce near misses with a target of zero environmental incidents.

6.3 The use of recycled content and secondary aggregates must be encouraged and given priority, reducing the demand for virgin material and optimising material efficiency in construction. In line with the recommendations of the Whole Life Carbon Assessment, prepared by Hoare Lea, the following opportunities may be explored:

- Use of read-mix concrete with 20% Ground Granulated Blast-furnace Slag (GGBS) and 20% cement replacement. Opportunities to increase concrete GGBS to 50% should also be considered.
- Reinforcement design to include for the use of 97% - 100% recycled content rebar.
- Employment of at a minimum, 20% recycled content steel within structural framing, with opportunities to employ 90% recycled content steel to be explored. In addition, use of galvanised stell within studwork and support frames with 15% recycled content. Additionally, the use of steel produced using Electric Arc Furnace (EAF) may be explored.
- Incorporation of aluminium cladding panels and glazing frames with 35% recycled content.
- Use of plasterboard partitioning and ceilings with a minimum 60% recycled content.

Demolition Waste Segregation and Diversion Targets

6.4 The project involves the partial demolition of the existing multi-storey car park and the redevelopment of the Site to deliver residential dwellings. The Proposed Development will therefore be constructed on brownfield land.

6.5 Demolition waste produced during construction of the Proposed Development is expected to generated during the partial demolition of the existing structures on the Site, and is anticipated to consist predominantly of inert and excavated materials created during the decommissioning of part of the existing multi-storey car part, in addition to groundworks and excavations. In line with London Plan Policy SI7, 95% of construction and demolition waste should be either reused, recycled or recovered. As a priority, non-hazardous inert material will be reused on-site, potentially in groundworks and future landscaping works. Where this is not practical, then material should be repurposed at nearby construction sites or recovered at licensed facilities. Non-hazardous excavated materials should target a landfill diversion rate of 95% of the total volume (m^3).

6.6 Further review is required once the Principal Contractor is appointed.

Construction Waste Segregation and Diversion Targets

6.7 The Building Research Establishment (BRE) has developed indicators to aid in the calculation of construction waste arisings at the design of a new development. The Environmental Performance Indicator (EPI) measures tonnes of waste / 100m^2 of gross floor area. Table 6.1 shows the EPIs from the BRE.

Table 6.1 Construction waste benchmarks

Project Type	Tonnes / 100m^2 gross floor area
Residential	15.3
Commercial Retail	15.7
Commercial Offices	12.4
Education	14.9
Leisure	14.8
Industrial Buildings	12.4
Healthcare	13.0

Notes: Data taken from BRE Waste Benchmark Data (issued October 2017)

6.8 Tables 6.2 below shows the estimated construction waste arisings for the Proposed Development, based on the indicative Gross Internal Area (GIA) and the applicable BRE benchmarks.

Table 6.2 Estimated Construction waste

Total GIA (m^2)	BRE project type	Tonnes / 100m^2 gross floor area (BRE)	Estimated construction waste (tonnes)
7,340	Residential	15.3	1,123.02
Total	-	-	1,123.02

6.9 It is estimated that approximately 1,123.02 tonnes of waste may arise from the construction of the Proposed Development. Waste generation is likely to vary significantly according to the programme and phasing.

6.10 It should be noted that the estimated total figure assumes wastage rates from site-wide infrastructure development such as utilities/plant including refuse storage, car parks, cycle storage, pavements and landscaping within the Industrial category. This is due to the fact that infrastructure development cannot be easily calculated using benchmarking data; and the BRE have no applicable information for this area of construction.

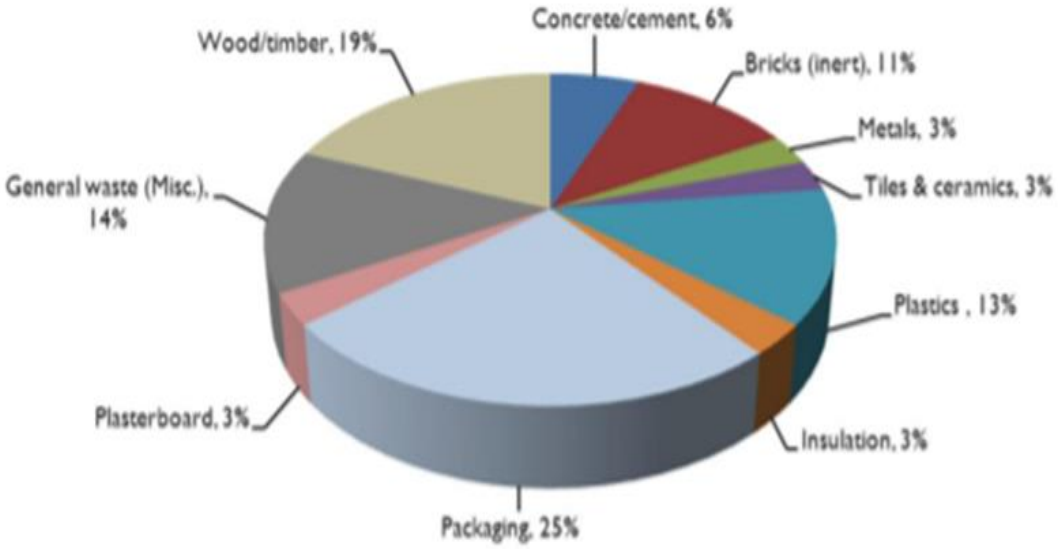
Identification and Classification of Waste

6.11 Prior to the start of works and/or upon the introduction of a new waste stream, the SWMP Owner will identify and classify waste materials leaving the Site by reference to a six-digit European Waste Catalogue (EWC) code and associated description as required by the List of Wastes (England) Regulations 2005 (LoWR). Waste can be solid, liquid or sludge.

Predicted Waste Streams

6.12 Figure 6.1 below illustrates the estimated composition of construction waste arisings for the Proposed Development, based on data from UK construction projects of a similar nature.

Figure 6.1 Estimated Construction Waste Composition (Source: SmartWaste)



6.13 Based on the total anticipated figure of 1,123.02 tonnes of construction waste, estimated using the indicative Gross Internal Area (GIA) of the Proposed Development and the applicable BRE benchmarks, Table 6.3 below provides an estimated breakdown of the waste arising by material type. It is intended that this SWMP remain a live document and that the final waste figures will therefore be inputted on the completion of the Proposed Development when available.

Table 6.3 Estimated Construction waste breakdown

Material Type (based on EWC Code classifications)	Suggested EWC Code	Waste Forecast (m^3)	Waste Forecast (tonnes)	Final Waste Figures
Waste paint and varnish containing organic solvents	08 01 11	12.6	3.4	*TBC*
Packaging (including separately collected municipal packaging waste)	15 01	22.2	6.0	*TBC*
Packaging containing residues of or contaminated by hazardous substances	15 01 10	11.1	3.0	*TBC*
Metallic packaging containing a dangerous solid porous matrix, including empty pressure containers	15 01 11	0.7	0.8	*TBC*
Absorbents, filter materials, wiping cloths, protective clothing contaminated by dangerous substances	15 02	1.6	0.4	*TBC*
Aqueous liquid wastes containing hazardous substances	16 10 01	1.6	0.4	*TBC*
Concrete	17 01 01	181.0	235.2	*TBC*
Bricks	17 01 02	125.1	150.2	*TBC*
Tiles and ceramics	17 01 03	50.1	60.1	*TBC*
Wood	17 02 01	35.8	25.0	*TBC*
Glass	17 02 02	80.1	60.1	*TBC*
Plastic	17 02 03	55.6	15.0	*TBC*
Bituminous mixtures containing coal tar	17 03 01	41.7	50.1	*TBC*
Iron and steel	17 04 05	125.1	150.2	*TBC*
Mixed metals	17 04 07	25.0	30.0	*TBC*
Metal waste contaminated with hazardous substances	17 04 09	10.0	12.0	*TBC*
Soil and stones	17 05 04	58.4	70.1	*TBC*
Gypsum-based construction materials	17 08	110.1	110.1	*TBC*

Material Type (based on EWC Code classifications)	Suggested EWC Code	Waste Forecast (m^3)	Waste Forecast (tonnes)	Final Waste Figures
Mixed construction and Demolition wastes	17 09 04	83.4	100.1	*TBC*
Textiles	20 01 11	18.5	5.0	*TBC*
Discarded electrical and electronic equipment	20 01 36	18.5	5.0	*TBC*
Biodegradable waste	20 02 01	41.1	30.8	*TBC*

* The table above has been populated with the information available to date. It will be updated as more information becomes available. The last column (final waste figures) will be populated at the end of the project once the final waste data is available.

6.14 Table 6.4 below shows the standard, good and best practice recovery rates for typical construction materials.

Table 6.4 Recovery rates for typical construction materials

Material	Standard recovery* %	Good practice recovery* (quick win) %	Best practice recovery* %
Timber	57	90	95
Metals	95	100	100
Plasterboard	30	90	95
Packaging	60	85	95
Ceramics	75	85	100
Concrete	75	95	100
Inert	75	95	100
Plastics	60	80	95
Miscellaneous	12	50	75
Electrical Equipment	Limited information	70**	95
Furniture	0-15	25	50
Insulation	12	50	75
Cement	Limited information	75	95
Liquids and oils	100	100	100
Hazardous	50	Limited information***	Limited information***
* Proposed waste management actions			
‘Reuse’ and ‘recycling’ are forms of waste recovery			
** This is a required recovery target for the type of Waste Electrical and Electronic Equipment (WEEE)			

6.15 It should be noted that typical hazardous materials from construction sites that fall within the HWR include:

- Treated wood, glass, plastic (alone or in mixture) containing dangerous substances;
- Bituminous mixture containing coal tar and other dangerous substances;
- Metals containing oil, coal tar and other dangerous substances;
- Cables containing oil, coal tar and other dangerous substances;
- Rubble or hardcore containing dangerous substances;
- Soil, stones and dredging spoil containing dangerous substances;
- Gypsum materials such as plasterboard containing hazardous materials;
- Unused or unset cement;
- Paints and varnishes containing organic solvents or other dangerous substances;
- Paint or varnish remover;
- Adhesives and sealants containing organic solvent or other dangerous substances; and
- Empty packaging contaminated with residues of dangerous substances e.g. paint cans.

6.16 Hazardous waste materials will be stored in secure bunded compounds in appropriate containers which are clearly labelled to identify their hazardous properties and are accompanied by the appropriate assessment sheets.

6.17 Any fuels, oils and chemicals that are used will be stored in appropriate containers within secure bunded compounds in accordance with good site practice and regulatory guidelines and located away from sensitive receptors.

6.18 This section will be reviewed and amended as required once the Principal Contractor is appointed.

Operational Waste Targets

6.19 LBH is committed to working towards meeting London Plan Policy SI7 of ensuring that there is zero biodegradable or recyclable waste to landfill by 2026 and meeting or exceeding the municipal waste recycling target of 65 per cent by 2030[4].

6.20 In line with the Mayor of London's target, the amount of waste to be diverted for recycling during operation of the Proposed Development has been set at 65% of the total volume (m^3). The waste hierarchy should be followed and landfill diversion (i.e., energy from waste) should be prioritised for the remaining volume in line with London Plan Policy SI7. The following actions have been identified to achieve this:

- Each dwelling will be fitted with a three-compartment waste bin, with each compartment corresponding to the relevant waste stream to be collected by the Council.
- Guidance for waste stream sorting and collection will be provided in the user manual.
- For a proportion of dwellings, centralised and easily accessible refuse areas located on the lower ground floor level, and for the remaining dwellings, the provision of storage space within private amenity spaces to the front of the units for the storage of waste.
- Adequate signage to reduce the likelihood of waste contamination.

[4] The London Plan (2021). Policy SI 7 Reducing waste and supporting the circular economy.

7. WASTE MANAGEMENT MEASURES

Construction Phase Waste Reduction Measures

7.1 This section presents a number of measures that may be implemented during the construction of the Proposed Development in order to minimise the amount of waste arising. Appendix A3 identifies additional measures for reducing waste during specific elements of the construction phase. This document will be further developed once the Principal Contractor has been appointed.

7.2 The waste hierarchy identified above will be followed throughout the construction phase. Good practice actions to reduce waste and subsequent actions identified during construction will be recorded within A2. This will seek to minimise the production of waste throughout the project.

Storage and Segregation

7.3 Where space allows, an area for the storage of off-cuts and surplus materials will be created with appropriate packaging and weatherproofing to keep them in usable order so that these materials can be reused on-site or stored for reuse on another project.

7.4 All waste will be stored securely on-site and during transportation to prevent pollution, contamination, fly tipping and nuisance complaints. A waste management compound will be established within the Site perimeter taking into account the sensitivity of the surrounding area and characteristics of the waste types produced on-site. This will be accessible to on-site staff and waste removal to facilitate re-use, recycling and recovery of waste. Signs will be placed throughout the relevant areas of the Site directing individuals to the location of waste storage areas.

7.5 The Applicant will also adhere to the following requirements:

- Waste will be segregated into hazardous, non-hazardous and inert waste. Waste materials will be classified in accordance with the LoWR and segregated on-site according to European Waste Classification (EWC) codes.
- There will be an adequate number of containers of an appropriate size and type for the collection and segregation of waste. Suitable containers may include: Wheelie bins: 240ltr, 360ltr, 660ltr; Skips: 8YD, 12YD, 16YD.
- Waste containers will be covered with netting, sheeting or lids to prevent the escape of waste and the contents from getting wet e.g., from rain and on-site water use.
- Storage areas for raw materials and assembly areas for construction components will be located away from sensitive receptors.

- All waste containers will be clearly labelled with appropriate segregation stickers as per the Institution of Civil Engineers (ICE) colour coding. Each will be labelled with the relevant waste segregation sign to help reduce mixed waste skips.

- During the internal fit out phases, wheelie bins or a practical alternative will be provided on each floor and labelled with segregation signs for each relevant waste stream being produced. Once full, these bins are to be transported to the designated waste consolidation area.

- Regular checks on-site will be conducted for litter and damage to waste containers, such as leaks.

- Temporary offices and work compounds on-site will retain all details relating to the waste strategy for the Site, health and safety and monitoring and reporting details.

7.6 In addition, the provision of effective and secure storage areas for construction materials is important to ensure that potential loss of material from damage, vandalism or theft is avoided. These measures will be supported by ensuring well-timed deliveries to the Site, providing on-site security and installing temporary site security fencing.

7.7 Implementation of good practice measures in terms of on-site storage and security practices will assist in reducing unnecessary wastage of material and ensure that high standards are maintained throughout the development process.

Earthworks

7.8 Where excavations required for groundworks and landscaping works encounter both Made Ground and the underlying natural soils, the soils should be segregated prior to subsequent testing for either disposal off-site or reuse on-site (under The Definition of Waste: Development Industry Code of Practice).

7.9 If off-site disposal is required, classification of surplus arisings should be carried out in line with the requirements of Technical Guidance WM3, including analysis of the total concentrations of polycyclic aromatic hydrocarbons, total petroleum hydrocarbons, metals and pH and waste acceptance criteria (WAC) analysis. If asbestos is identified in the sample, asbestos quantification testing should be undertaken.

7.10 Where practicable, clean excavated material will be reused on-site within the proposed landscaping works.

7.11 Any material that cannot be reused on-site will be removed by licensed waste carriers and sent for treatment or disposal (as appropriate) at appropriately licensed facilities.

Gypsum Waste

7.12 Any waste containing any amount of Gypsum that is sent to landfill must go to a separate cell for high sulphate waste. Therefore, it is imperative that Gypsum waste is separated from other waste.

7.13 The following measures will be implemented to address this:

- A dry storage area will be set aside for bagged plaster mix. This will reduce wastage and may save money.
- Mixed or dry plaster should not be washed into drains or surface waters as this can cause water pollution.
- Clean, uncontaminated plasterboard will be recycled.
- Wet, mixed plaster should be left to go off before disposal. Liquid waste cannot be disposed of at landfill sites.
- Plaster, plasterboard and other Gypsum products will be separated from general waste, as they contain high levels of sulphates.

Landfill

7.14 Indicative lists of landfill sites and transfer / treatment facilities that have the potential to receive waste from the Proposed Development can be found at Appendix A4. It should be noted that the specific waste facilities that will be used during construction phases will not be known until the Principal Contractor(s) has been appointed.

Sustainable Selection of Construction Materials

7.15 A sustainable materials selection strategy should be prepared prior to construction. Measures should be taken, such as face-to-face 'toolbox talks' and provision of clear operational instructions, to ensure that contractors are committed to the operation of good practice measures on-site with emphasis on continual improvement and identifying appropriate opportunities to reduce waste, promote recycling and use recyclable materials. The ordering of appropriate, minimum amounts of building materials should be part of the materials selection strategy.

Promotion of Best Practice

7.16 As part of the encouragement of on-site best practice, there will also be a need to ensure that suppliers of raw materials to the Proposed Development are committed to reducing any surplus packaging associated with the supply of any raw materials. This includes the reduction of plastics (i.e. shrink wrap and bubble wrap), cardboard and wooden pallets. This may involve improved procurement and consultation with selected suppliers regarding commitments to waste minimisation, recycling and the emphasis on continual improvement in environmental performance. Where

practical, site waste targets and incentives will be set and incorporated into the contracts of supply chain suppliers.

7.17 Table 7.1 summarises the most important mitigation measures to minimise the potential waste of on-site materials during construction. It is important to note, however, that not all construction materials will be provided by local suppliers.

Table 7.1 Measures to reduce the wastage of on-site construction materials

Task	Action
Ordering	Avoid: Over-ordering (order 'just in time') Ordering standard lengths rather than lengths required Ordering for delivery at the wrong time (update programme regularly)
Delivery	Avoid: Damage during unloading Delivery to inappropriate areas of the Site Accepting incorrect deliveries, specification or quantity
Storage	Avoid: Damage to materials from incorrect storage Loss, theft or vandalism through secure storage and on-site security
Handling	Avoid: Damage or spillage through incorrect or repetitive handling

7.18 Where practicable, waste types that have the potential to be reused on-site or transported off-site for recycling will need to be segregated. Although every effort will be made to retain all suitable materials on-site, it is possible that some of these materials cannot be reused or recycled during the construction process. In these situations, the Site Managers will work to identify a nearby Transfer Station or suitably licensed facility in order for material to be redistributed as fill on other suitable sites. This represents the most sustainable alternative to landfill disposal.

Construction Logistics and Traffic Impacts

7.19 The logistics associated with construction waste are affected by a wide range of factors. The quantity and types of waste materials generated will fluctuate during the construction phases and the resulting number of waste collections will be dictated by a range of variables, including the amount of storage space for waste, the capacity of waste containers used, the materials segregated for recycling and whether any on-site processes are used for reducing the volume of waste (e.g. compactors / balers / shredders etc.).

7.20 The Principal Contractors will be expected to provide construction waste logistics forecasts, that will be discussed with waste contractors and the relevant local authority following appointment of relevant parties.

7.21 The impact of traffic associated with the movement of construction and waste materials on surrounding neighbourhoods and the local road network will be minimised by a combination of factors. These include reducing the need to import / export materials; and minimising off-site removal

of waste to landfill. Dedicated haulage routes will be agreed with the local authority to minimise disturbance to local communities.

Pre-Construction Phase Waste Reduction Measures

7.22 During the pre-construction phase, the following measures and actions have been identified for review by the design team.

Table 7.2 Pre-Construction Phase Waste Reduction Measures

Action	Responsibility	Agreed Outcome
Minimise lift pit depths	Design Team	*TBC*
Structural solutions that minimise and simplify the structure as much as possible, e.g. use of pre-cast concrete	Design Team	*TBC*
Use of cement alternatives	Design Team	*TBC*
Re-use of excavated material	Design Team	*TBC*
Using materials with high recycled content (RC)	Design Team	*TBC*
Prioritise durable products and materials	Design Team	*TBC*
Prioritise products with EPDs, ISO14001, BES6001, or accredited EMS certification	Design Team	*TBC*
Use of low embodied carbon façade cladding	Design Team	*TBC*
Materials procurement from manufacturers adopting cleaner manufacturing processes	Design Team / Applicant	*TBC*

Action	Responsibility	Agreed Outcome
Paints and finishes with low VOC content and formaldehyde levels will be specified	Design Team	*TBC*
Minimise composite materials	Design Team	*TBC*
Aim to specify standard sized components	Design Team	*TBC*
Maximise non-structural internal partitions	Design Team	*TBC*
Consider flexible floor plates or grids	Design Team	*TBC*
Waste management to be integral to the procurement process and appointment of contractors	Design Team / Applicant	*TBC*

Setting Targets

7.23 In addition to those presented within this document, appropriate targets and objectives will be set in relation to the minimisation and recycling of any waste materials during earth works and construction. This will ensure that a clear action plan is generated for the management of specified types and quantities of materials identified for each of the construction stages. These targets will be agreed at the inaugural meeting between the Principal Contractors, the contractors and the local authority.

7.24 To ensure that the system of waste prevention, minimisation, reuse and recycling is effective, consideration will be given to the setting of on-site waste targets and a suitable programme of monitoring at regular intervals to focus upon:

- Quantifying raw material wastage;
- Quantifying the generation of each waste type;
- Any improvements in current working practices;
- Methods by which the waste types are being handled and stored; and
- The available waste disposal routes used, e.g. landfills, waste transfer stations.

7.25 The Principal Contractors will be responsible for the setting and review of waste targets from the outset of the development process to ensure that high standards are maintained with the emphasis being on continual improvement. Specific waste quantification and monitoring will assist in determining the success of waste management initiatives employed on each construction site and progress against these targets should be relayed back to the appropriate stakeholders.

Training

7.26 Waste training will be provided by the Principal Contractors or external trainers and include a combination of the following:

- Induction covering general waste management on-site including segregation and storage.
- Toolbox Talks and briefings covering specific waste topics such as the legal requirements for the management of waste; the environmental effects of waste; and management of soil movements.
- Specialist Waste Training for individuals such as how to complete WTNs/HWCNs for those who have responsibility for completing and signing off WTNs/HWCNs.

Operational Phase Waste Reduction Measures

7.27 This section details the strategy that will be adopted to manage the waste arising from the Proposed Development once operational.

Operational Waste Management Strategy

7.28 It is intended that a waste strategy utilising traditional wheeled bins be employed for the collection of waste within the residential cores of the Proposed Development.

Management and Storage of Waste

7.29 In order to facilitate easy sorting of waste streams for residents, each dwelling will be fitted with a three-compartment waste bin, with each compartment corresponding to the relevant waste stream to be collected by the Council. This will maximise the potential for residents to correctly sort waste within their home. Guidance for waste stream sorting and collection will be provided in the home user manual.

7.30 For a portion of the proposed dwellings, dedicated domestic waste stores have been located at the lower ground floor, with one store (Store A) provided within the curtilage of the building adjacent to the main entrance, and another store (Store B) provided to the rear of the centralised landscaped area. For the remaining dwellings, all of which are located at the lower ground floor level, waste will be stored within the private amenity space to the front of each unit. This will ensure easy access for both residents and the Council' waste operatives. This will also ensure that residents are not required to carry refuse in excess of 30m (horizontal distance) from their front doors. The waste storage areas

will have dedicated containers for, at a minimum, refuse, dry recycling and compostable waste streams which will be segregated in line with the relevant guidance, standards and legislation.

7.31 Waste within each domestic waste store would be collected by the Council on a weekly basis.

7.32 The locations of domestic waste storage areas are shown in Appendix A2.

7.33 The waste storage areas will be designed to the standards within BS5906:2005 Waste management in buildings – Code of practice and in accordance with BS 8300:2009. In summary, the facilities should include the following:

- A suitable water point in close proximity to allow washing down to mitigate against odours;
- All surfaces sealed with a suitable wash proof finish (vinyl, tiles etc.);
- A suitable floor drain;
- All surfaces easy to clean; and
- Suitable lighting and ventilation (the latter to help mitigate against any odours).

7.34 All waste storage areas will be designed to ensure the appropriate segregation of non-hazardous and hazardous waste, as required by the relevant guidance, standards and legislation. They will have clear signage to ensure cross contamination of refuse, recycling and other waste streams is minimised.

7.35 Doors will have a minimum clearance opening of 1.5m. Floor surfaces will be of a smooth, continuous finish and free from steps or other obstacles. Any steps will incorporate a drop-kerb.

Collection of Waste

7.36 Residents will be responsible for depositing waste in the correct refuse storage areas and bins.

7.37 The LBH standard residential waste collections occur on a weekly basis at present.

7.38 Surfaces that waste containers need to be moved over will be of a smooth, continuous finish and free from obstacles. Any steps will incorporate a drop-kerb. Measures will be taken by the tenants to ensure that access to the agreed collection points will not be restricted on collection days.

8. MONITORING AND REPORTING

8.1 All movements of waste from the Site will be recorded and evidenced through WTNs or HWCNs.

8.2 The Site will be monitored on a monthly basis during the construction phase to confirm whether the requirements of the SWMP are being managed effectively. This will ensure:

- That the plan is up-to-date and that it is the correct version;
- That skip returns and waste data are being faxed or emailed back to the Applicant;
- That subcontractors are complying with the SWMP; and
- That Waste Carrier returns are being received and filed.

8.3 Waste Records have to be accurate so that the SWMP's progress is monitored correctly. A database will be used to record all waste leaving the Site. Records will be taken directly from relevant forms, waste tickets and monthly waste reports provided by the Waste Contractor.

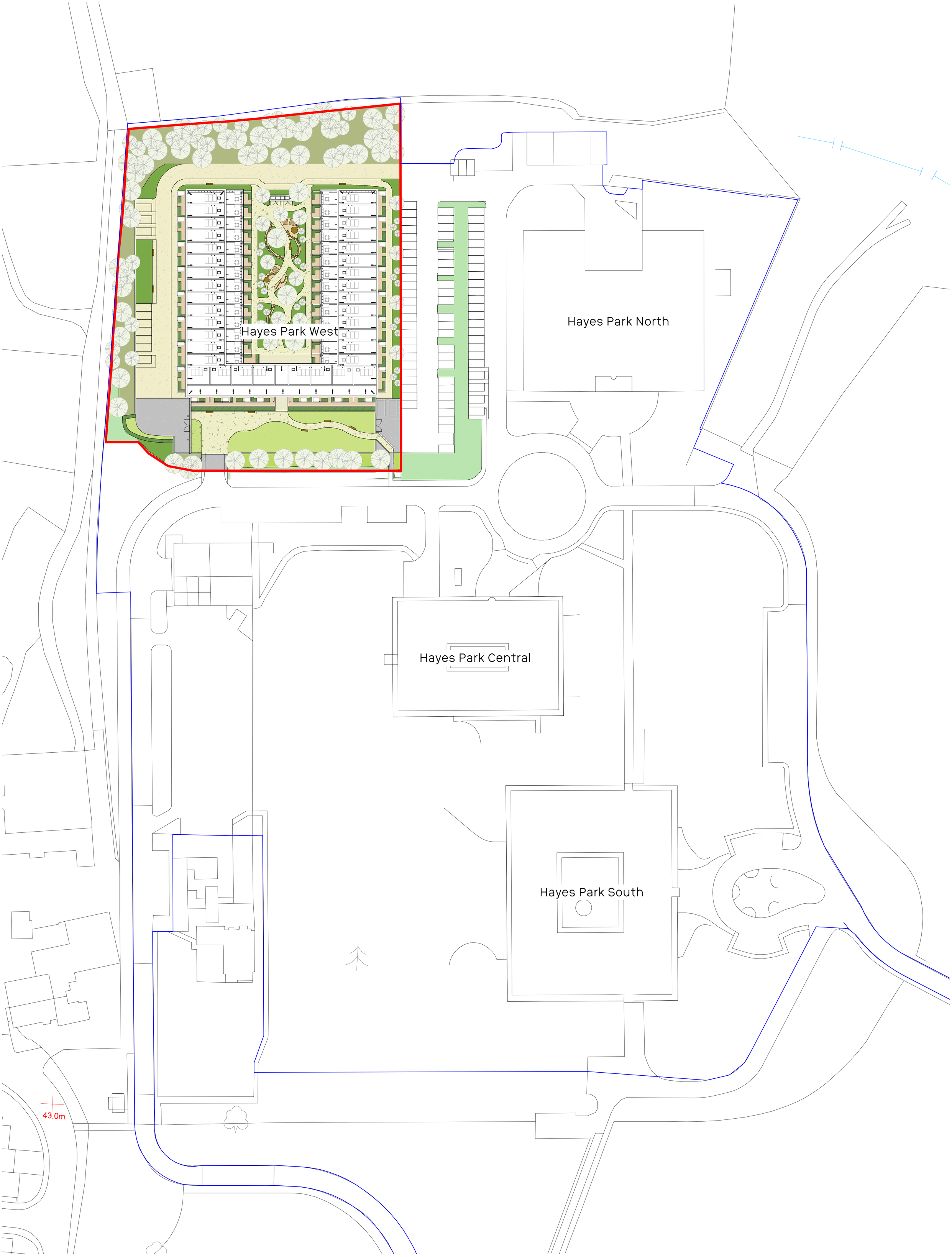
8.4 Waste Data Collections forms to be recorded and collected on a monthly basis. The electronic SWMP will be kept up-to-date following receipt of the completed forms, and at a period of not less than every three months, to ensure that the plan accurately reflects the progress of the project.

8.5 A review of the data will be carried out every three months, to ensure the compliance targets are being met, and any exceedances in waste type and percentages are reasoned, and actions implemented.

8.6 Once construction works are complete, a report will be completed, containing the following:

- Confirmation that the SWMP has been monitored on a regular basis;
- Comparison of the estimated quantities and percentages of each waste type against the actual quantities of each waste type;
- A short analysis and discussion; and
- Recommendations and conclusions.

A1. SITE PLAN



General Notes

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation.
Do not scale this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.
All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Notes

All SEW drawings are based on survey information by CSL Surveys, dated May 2021

Hayes Park West Boundary

Hayes Park Masterplan Boundary

Key Plan

0 20m
@ 1:500

Project No.	0489
Project Name	Hayes Park West

Drawing Title	Proposed Site Plan
Client	Shall Do Hayes Developments Ltd
Scale @A1	1 : 500
Date	20/08/25
Drawn by	PJ
Checked by	GLJ

Rev	Date	Reason	Chk
02	21/08/25	Design Freeze	
01	29/07/25	For Information	
00	10/06/25	For Information	

Studio Egret West
3 Brewhouse Yard
London, EC1V 4JQ
hello@egretwest.com
+44 (0) 20 7549 1730

Drawing Number	Rev
0489-SEW-ZZ-ZZ-DR-A-501001	02

A2. LOCATIONS OF WASTE STORAGE AREAS

General Notes

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation.
Do not scale this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.
All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Notes

Unit Types

- 1B2P
- 3B6P
- 4B7P
- BOH
- C3 Residential Ancillary

Parking

- EV Parking

Boundary

- Application Boundary

0 10m
@ 1:200

Key Plan

Studio Egret West
3 Brewhouse Yard
London, EC1V 4JQ
hello@egretwest.com
+44 (0) 20 7549 1730

Project No.	0489
Project Name	Hayes Park West
Drawing Title	Proposed Lower Ground Site Plan
Client	Shall Do Hayes Developments Ltd
Scale @A1	1 : 200
Date	13/06/25
Drawn by	PJ
Checked by	GLJ

Rev	Date	Reason	Chk
02	21/08/25	Design Freeze	
01	13/08/25	For Information	
00	29/07/25	For Information	

Drawing Number	Rev
0489-SEW-HPW-ZZ-DR-A-501002	02

A3. CONSTRUCTION PHASE WASTE REDUCTION MEASURES

Table A3.1 Construction Phase Waste Reduction Measures

Element	Waste Type	Estimated Quantity	Is this Hazardous Waste? (Y / N)	Waste Reduction Measures	Recycling Measures
Substructures					
Groundworks Piling Foundations Below-ground Services	Excavation waste	TBC		Re-use at a later stage of the project or investigate options for use on other projects	
	Excess concrete	TBC		Use as blinding to future pours	
	Timber	TBC		Re-use timber frames and formwork	Recycle using segregated skips or bins
	Pipework and Ducting	TBC		Avoid over-ordering and return excess material	
Superstructure					
Frame Envelope Roofing	Metalwork	TBC			Recycle using segregated skips or bins
	Timber	TBC		Re-use timber frames and formwork	Recycle using segregated skips or bins
	Concrete	TBC		Care taken to order correct quantity	Discuss return policy with supplier
	Bricks and Mortar	TBC			Recycle using segregated skips or bins
	Pallets and Packaging	TBC		Minimise packaging	Agree return or recycling policy with suppliers

Finishes					
Drylining and Partitions Joinery Painting and Decorating	Metals	TBC		Order in optimised lengths to minimise on-site cottage and wastage	Recycle using segregated skips or bins
	Timber	TBC		Order in optimised lengths to minimise on-site cottage and wastage	Recycle using segregated skips or bins
	Plasterboard	TBC		Order in optimised lengths to minimise on-site cottage and wastage	Discuss return policy with supplier
	Pallets and Packaging	TBC		Minimise packaging	Recycle using segregated skips or bins
	Plastics	TBC			
Building Services					
M&E Plumbing Security IT and Comms Cabling	Metals	TBC		Order in optimised lengths to minimise on-site cottage and wastage	Recycle using segregated skips or bins
	Cables	TBC			Recycle using segregated skips or bins
	Plasterboard	TBC		Order in optimised lengths to minimise on-site cottage and wastage	Discuss return policy with supplier
	Pallets and Packaging	TBC		Minimise packaging	Agree return or recycling policy with suppliers
	Plastics	TBC		Avoid over-ordering and return excess material	
Site Facilities					
Cleaning Service	Canteen Waste	TBC			Recycle using segregated skips or bins
Canteen Provision	Office Paper and Drawings	TBC		Print double-sided where possible	Recycle using segregated skips or bins

Office Management	Site Hoarding	TBC			Re-use on other sites. Recycle using segregated skips or bins
	Plastic, Foam Cups and Cutlery	TBC		Use of re-usable mugs, plates and cutlery instead of disposable	

A4. RELEVANT LANDFILL/TREATMENT SITES

Table A4.1 Selected landfills in proximity to West London

Environmental Permitting Reference	Waste Management Licence No.	Operator	Site Type	Waste Types Permitted	Site Address and Postcode
BV1674IL	N/A	Pinden Ltd.	Merchant hazardous Landfill 01	Asbestos and Asbestos contaminated wastes. Contaminated Soils inc. Hazardous	Pinden Quarry Landfill, Green Street, Green Road, Longfield, Dartford, DA2 8EB
KP3187NU/V004	80524	Havering Aggregates Ltd.	Inert Landfill 05	Inert C&D Waste	South Hall Farm, New Road, Rainham, Essex, RM13 9EW
EPR/EP3136GK/V007	N/A	Veolia ES Landfill Limited	Non-Hazardous Landfill 04	Wide Variety	Rainham Landfill, Coldharbour Lane, Rainham, RM13 9DA
DP3794ER/V002	101016	Ingrebourne Valley Ltd.	Inert Landfill 05	Inert C&D Waste	New Road, Rainham, Essex, RM13 9GF
CP3190VE/T001	210001	Ingrebourne Valley Ltd.	Inert Landfill 05	Inert C&D Waste	Marks Warren Quarry Landfill, Whalebone Lane North, Romford, Essex, RM6 6RB
EB3201HA/V002	403322	Brett Aggregates Limited	Inert Landfill 05	Non-hazardous soils & stones, inert C&D waste. Recovery R5.	East Hall Farm, New Road, Wennington, Rainham, Essex, RM13 9DS
QP3196NT/V003	80124	Ebbcliff Limited	A5 Landfill Non-Biodegradable Wastes	C&D Waste	Mardyke Farm, South Dagenham Road, South Hornchurch, Dagenham, Essex, RM13 7RS
YP3791NR/V004	80389	Brett Tarmac Ltd	A5 Landfill Non-Biodegradable Wastes	C&D Waste	Fairlop Quarry, Hainault Road, Little Heath, Redbridge, Essex

Notes: Source: EPR Landfill Sites - Quarterly Summary - End July 2025

Table A4.2 Selected landfills in Hertfordshire (bordering North London)

Permit / Installation reference	Waste Management Licence No.	Operator	Site type	Waste types permitted	Site address
BW0231IH	N/A	Water Hall (England) Ltd	L04 Non-Hazardous	Wide Variety	Waterhall Quarry, Lower Hatfield Road, Hertford SG13 8LF
BP3893EW/V006	80737	Tarmac Aggregates Ltd	Inert Landfill L05	Inert C&D Waste	Tyttenhanger Landfill Site, Coursers Road, London Colney, Colney Heath, Hertfordshire, AL4 0PG
LP3993EU/V002	80760	Ingrebourne Valley Ltd.	Inert Landfill L05	Inert C&D Waste	Hoddesdon Quarry Landfill, Cock Lane, Hoddesdon, Hertfordshire, EN11 8LS
N/A	80216	C J Pryor Ltd	A5 Landfill taking Non-Biodegradable Wastes	C&D Waste	Presdales Pit, Hoe Lane, Ware, Hertfordshire, SG12 9NX
N/A	80271	Hepburn Cyril	A5 Landfill taking Non-Biodegradable Wastes	C&D Waste	Woodcock Hill Farm, Barnet Lane, Elstree, Hertfordshire, WD6 3SU

Notes: Source: EPR Landfill Sites – Quarterly Summary – End July 2025

Table A4.3 Selected transfer and treatment facilities in London

Permit / Installation reference	Waste Management Licence No.	Operator	Site type	Waste types permitted	Site address
HP3098EW/V	100373	Biffa G S Environmental Ltd	A11 Household, Commercial & Industrial Waste T Stn	Wide Variety	Unit 2, Aztec 406, 12, Ardra Road, Enfield, London, N9 0BD
FB3609LQ/A001	404398	GBN Services Ltd	A11 Household, Commercial & Industrial Waste T Stn	Wide Variety	Montagu Industrial Estate, Gibbs Road, Edmonton, London, N18 3PU
PP3093EE/V007	80723	Powerday Plc	A15 Material Recycling Treatment Facility	Wide Variety	Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ
FB3600TZ/A001 4	404338	Premier Material Supplies	A16 Physical Treatment Facility	Enfield Bund Soil Management Area	Holly Hill Farm, The Ridgeway, Enfield, Middlesex, EN2 8AN
JP3795EL/V003	100204	J O'Doherty Haulage Ltd	A11 Household, Commercial & Industrial Waste T Stn	Wide Variety	Pegamoid Site, Nobel Road, Edmonton, London, N18 3BH
DP3891NP/V002	80355	Camden Plant Ltd	A16 Physical Treatment Facility	Wide Variety	Lower Hall Lane, Chingford, London, E4 8JG

Notes: Source: EPR Landfill Sites – Quarterly Summary – End July 2025

A5. GENERAL NOTES

A5.1 The report is based on information available at the time of the writing and discussions with the client during any project meetings. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Iceni Projects Ltd for inaccuracies in the data supplied by any other party.

A5.2 The review of planning policy and other requirements does not constitute a detailed review. Its purpose is as a guide to provide the context for the development and to determine the likely requirements of the Local Authority.

A5.3 No site visits have been carried out, unless otherwise specified.

A5.4 This report is prepared and written in the context of an agreed scope of work and should not be used in a different context. Furthermore, new information, improved practices and changes in guidance may necessitate a re-interpretation of the report in whole or in part after its original submission.

A5.5 The copyright in the written materials shall remain the property of Iceni Projects Ltd but with a royalty-free perpetual licence to the client deemed to be granted on payment in full to Iceni Projects Ltd by the client of the outstanding amounts.

A5.6 The report is provided for sole use by the Client and is confidential to them and their professional advisors. No responsibility whatsoever for the contents of the report will be accepted to any person other than the client, unless otherwise agreed.

A5.7 These terms apply in addition to the Iceni Projects Ltd "Standard Terms of Business" (or in addition to another written contract which may be in place instead thereof) unless specifically agreed in writing. (In the event of a conflict between these terms and the said Standard Terms of Business the said Standard Terms of Business shall prevail). In the absence of such a written contract the Standard Terms of Business will apply.