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# Site Waste Management Plan

3 The Square, Stockley Park, Hayes, Uxbridge, UB11 1ET

Iceni Projects Limited on behalf of F&C Commercial  
Property Holdings c/o Columbia Threadneedle Real  
Estate Partners

February 2024

ICENI PROJECTS LIMITED  
ON BEHALF OF F&C  
COMMERCIAL PROPERTY  
HOLDINGS C/O COLUMBIA  
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# 1. INTRODUCTION

Iceni Projects Ltd was commissioned by F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate Partners ('The Applicant') to produce a Site Waste Management Plan (SWMP) to support the planning application for the proposed redevelopment of 3 The Square, Stockley Park. 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 refurbishment 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.

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

1.2 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.

1.3 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

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### Project Information

1.4 Table 1.1 below provides the key project information available at this stage. Table 1.2 provides an overview of the project metrics.

**Table 1.1 Key Project Information**

Applicant	F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate Partners
Employers Agent	Iceni Projects
Principal Contractor	TBC
Principal Designer	TBC
Site Location	3 The Square, Stockley Park, Hayes, Uxbridge, UB11 1ET Grid Reference: TQ085800
Start Date	June 2024
Completion Date	December 2025
Description of Project	The Proposed Development seeks to redevelop the existing office building to deliver a post-operative care facility, alongside high-quality landscaping.
Waste Management Champion	TBC
SWMP Owner	TBC

**Table 1.2 Project Metrics**

Metrics	Existing Amount	Unit
Footprint of Structure	8,547	m <sup>2</sup>
Gross Internal Area (GIA)	10,361	m <sup>2</sup>

### Site and Surroundings

1.5 The application site (Appendix A1) is located within the London Borough of Hillingdon (LBH), to the north of London Heathrow Airport. The site, which is situated within the Stockley Park business estate, is bounded by The Square to the south, an office building at 2 The Square to the west, and an office building at 4 The Square to the east, which is currently in use by Hikvision UK, as well as Hasbro UK and Hasbro European Services. The northern boundary of the site is formed by the Stockley Park Golf Course.

1.6 The application site itself currently comprises a vacant office building, with associated car parking and hard surfaces, that was previously used as the European headquarters for the Japanese electronics manufacturer, Canon. The surrounding area is characterised by business and office uses,

with the Grade II listed Registered Park and Garden, Stockley Park, located to the northwest of the site, the Stockley Park Golf Club to the north, and the Lake Farm Country Park to the east.

### **The Proposed Development**

1.7 The description of the development is as follows:

*“Full planning permission for the change of use of existing office building (Use Class E, formerly Use Class B1) to a post-operative care facility (Use Class C2) and the provision of landscaping and associated works.”*

1.8 The project will involve the renovation and re-purposing of the existing building to accommodate various medical services, including primary care, specialty care, diagnostic services, laboratory services, imaging services, preventive care services, and rehabilitation services.

1.9 The primary objectives of the project are to:

- Re-purpose a 03 The Square into a state-of-the-art healthcare facility.
- Enhance the availability of healthcare services in the community.
- Create a patient-centric environment that meets all regulatory standards.
- Revitalize the surrounding area and contribute to its economic growth.

## **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 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 sorting, storing and collecting both site and operational waste are incorporated within policy and regulation as set out below.

#### **Legislation and Best Practice Guidance**

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##### **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 The HWR covers the various types of clinical waste such as sharps and anatomical waste. The regulations detail clinical waste guidelines on labelling, record keeping, and monitoring hazardous waste for every party involved, from the business that produces it to waste carriers.

3.6 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**

3.7 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**

3.8 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.

3.9 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 is borne by the waste holder in accordance with the polluter pays principle.

### **Materials Management Plan**

3.10 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**

3.11 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 (WTS)**

3.12 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.

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

3.14 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)**

3.15 The Control of Pollution (Amendment) Act 1989 establishes the requirement for carriers 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.

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

#### **Site Waste Management Plans (SWMPs)**

3.17 The legislation<sup>1</sup> 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

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<sup>1</sup> Site Waste Management Plans Regulations 2008 (Repealed in December 2013).