that SWMPs, when correctly implemented, can improve construction waste management with associated environmental and economic benefits.

3.18 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.

3.19 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

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

3.21 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.

3.22 Once finalised and approved by the LBH, 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

3.23 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.

3.24 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.

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

Policy Context

The London Plan (March 2021)

3.26 **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.

West London Waste Plan (July 2015)

3.27 Prepared jointly by the six West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, the West London Waste Plan (July 2015):

- Details the estimated amounts for the different types of waste that will be produced in West London up to 2031;
- Identifies and protects the current sites to help deal with that waste;
- Identifies the shortfall of capacity needed over the life of the Plan (to 2031); and
- Allocates a set of sites to meet the shortfall which are preferred for waste related development.

3.28 Whilst the policies contained within this plan are specific to waste management facility provision, the principles of sustainable waste management and the application of the waste hierarchy is encouraged within all development proposals.

London Borough of Hillingdon Local Plan: Part 1 – Strategic Policies (November 2021)

3.29 **Strategic Objective 13 (SO13)** is to support the objectives of sustainable waste management.

3.30 **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.

3.31 The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

3.32 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.

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

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

3.34 **Policy DMBH 11 (Design of New Development)** states that development proposals should make sufficient storage provision in design 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.

3.35 **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

3.36 The Standard provides a code of practice for the storage, collection, segregation for recycling and recovery, and on-site treatment of waste. It applies to new buildings, refurbishments and conversions of residential and non-residential buildings. 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 for non-domestic uses

Building Type	Equation for weekly waste arisings (litres)
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

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*

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	F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate Partners	78 Cannon Street, London EC4N 6AG	020 7621 9100	ClientServices@columbiathreadneedle.com
Principal Contractor	*TBC*	*TBC*	*TBC*	*TBC*
Principal Designer	*TBC*	*TBC*	*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.

[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.

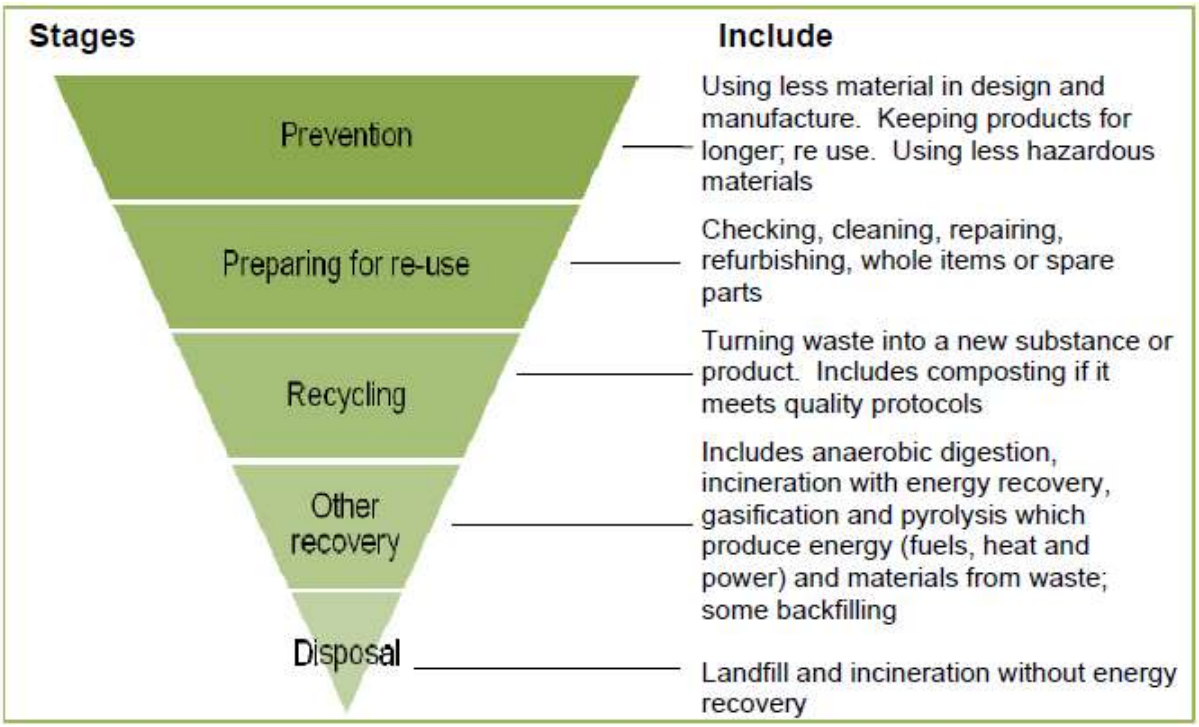
5. Designing for disassembly.

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

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 site 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.