Homes England

The Housing and Regeneration Agency

West of Ifield, Crawley
Outline Site Waste Management Plan

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WEST OF IFIELD
OUTLINE SITE WASTE MANAGEMENT PLAN

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WEST OF IFIELD
OUTLINE SITE WASTE MANAGEMENT PLAN

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1. INTRODUCTION

1.0.1 Ramboll UK Limited (Ramboll) has been appointed by Turner and Townsend Project Management Ltd (the 'Client') on behalf of Homes England (the 'Applicant') to provide an Outline Site Waste Management Plan (SWMP) for a residential-led mixed use development (the 'Proposed Development') located at land to the West of Ifield, Crawley, West Sussex (the 'Site', as illustrated in Figure 1-1 below).

1.0.2 This document aims to identify high level waste objectives and set the direction for the 'Detailed SWMP' to be produced by the demolition and construction contractor (the 'Principal Contractor') for management of construction and demolition waste associated with the Proposed Development.

1.1 Site Description

1.1.1 The Site falls within the administrative area of Horsham District Council (HDC).

1.1.2 The Site covers approximately 171 hectares (ha). The Site is located on land to the west of Ifield near Crawley in West Sussex, centred approximately at National Grid Reference TQ 23679 36673.

1.1.3 The Site is predominantly occupied by a mixture of arable and pastoral fields and includes the Ifield Golf Course and Country Club (hereafter referred to as the 'golf course') in its far southern portion. The River Mole is present across the northern part of the Site and flows from south-west to north-east.

1.1.4 Current access to the Site is via Charlwood Road in the north and Rusper Road to the south.

1.1.5 An area to the east of the Site is occupied by Ifield Brook Wood and Meadows, which adjoins a wooded area and extends into an area of ancient woodland. Ifield Brook Wood and Meadows is designated as a Local Wildlife Site (LWS) and a Site of Nature Conservation Importance (SNCI).

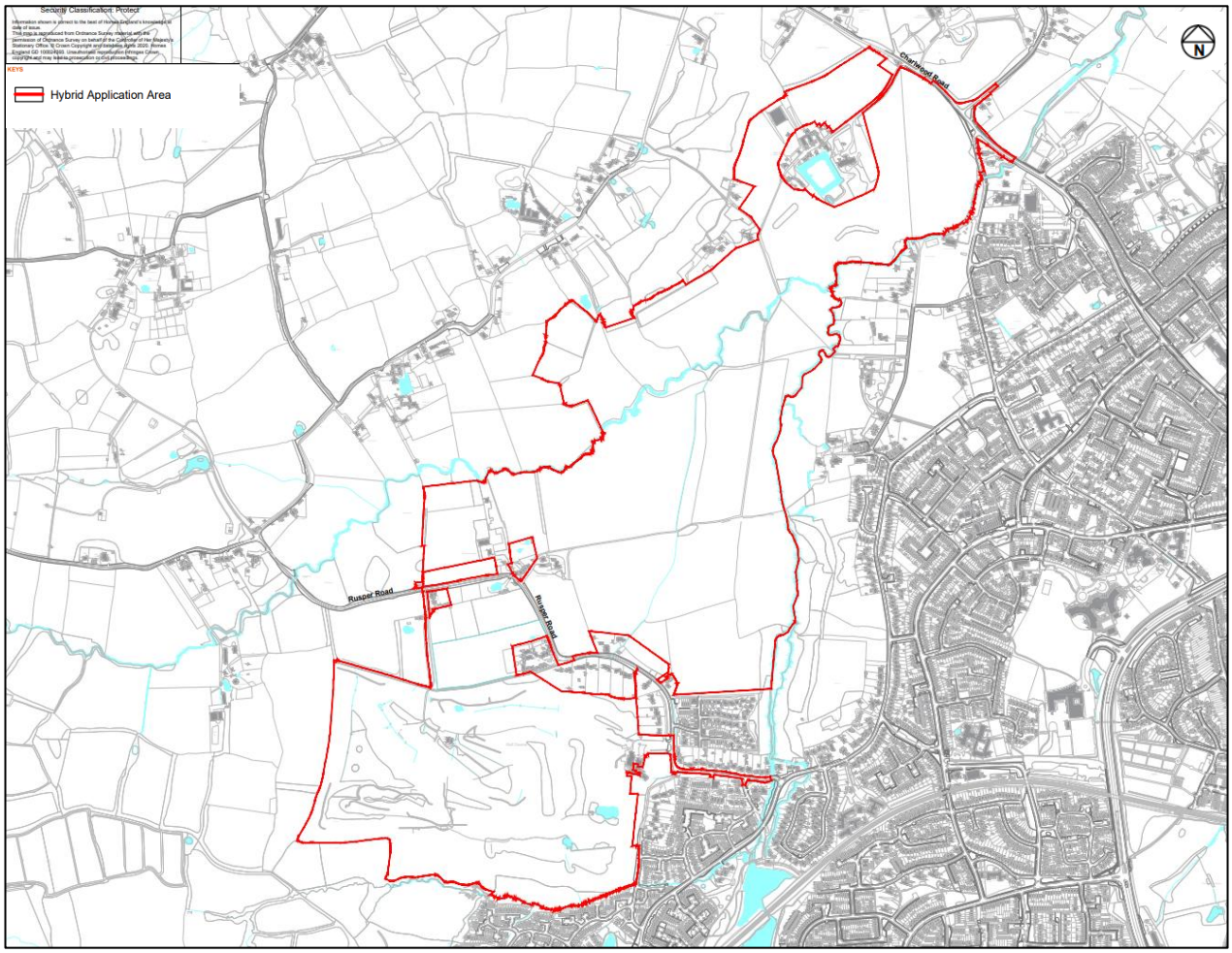

Figure 1-1: Site Location Plan (WOI-HPA-PLAN-LOC-01)

1.2 Proposed Development

1.2.1 The hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprises:

"A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside

An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.

This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way."

Table 1-1: Land Use Table

Use Class	**Max Total Sqm (GEA) / units / ha**	**Sub Class (where relevant)**	**Min or Max floorspace (GEA) to be enforced as part of S106** (where relevant)
Class E - Commercial, Business and Service	Up to 40,130 sqm	E(a) Display or retail sale of goods, other than hot food	A maximum of 5,200sqm can be provided for Class E(a) uses
		E(b) Sale of food and drink for consumption (mostly) on the premises	
		E(c) Provision of: (i) Financial services, (ii) Professional services (other than health or medical services), or (iii) Other appropriate services in a commercial, business or service locality	
		Class E(d)- indoor sport, recreation or fitness	Minimum of 3,400sqm provided as a Local Leisure Centre
		Class E(e) - Provision of medical or health services	Minimum of 1,500sqm to be provided for healthcare-related uses
		Class E(f) - Creche, day nursery or day centre	Minimum of 1,100sqm to be provided as a private early years facility
		E (g) Uses which can be carried out in a residential area without detriment to its amenity: (i) Offices to carry out any operational or administrative functions, (ii) Research and development of products or processes (iii) Industrial processes	
Class B2- General industrial	Up to 5,200 sqm	N/A	
Class B8- Storage or distribution	Up to 7,200 sqm	N/A	
Class C1 – Hotels	Up to 80 beds	N/A	

Use Class	Max Total Sqm (GEA) / units / ha	Sub Class (where relevant)	Min or Max floorspace (GEA) to be enforced as part of S106 (where relevant)
Class C2/C3 - Residential institutions / Dwellinghouses	Up to 3,000 homes		
Sui Generis – Gypsy and Traveller pitches	Up to 15 pitches		
F1 – Learning and Non-residential institutions	Up to 11.75 ha	3 form entry (FE) Primary School in Plot Q1 including 1 x Early Years Nursery and Student Support Centre.	A minimum site of 2.4ha to be provided
		6-8 FE Secondary School including sixth form	A minimum site of 9.29ha to be provided
Class F2 - Local community	Up to 1,200 sqm	Class F2(b)- Halls or meeting places for the principal use of the local community	Minimum of 600sqm to be provided for community uses

1.3 Project Programme and Phasing

1.3.1 The demolition and construction stage of the Proposed Development would include the following key activities which have the potential to produce waste:

- Demolition of existing buildings and hardstanding;
- Excavation works;
- Diversion and installation of below ground utilities;
- Construction of access and service infrastructure;
- Construction of foundations;
- Construction of new buildings; and
- Landscaping, drainage and open space.

1.3.2 It is anticipated that the works could potentially be split into five phases. The timing and duration of the demolition phase remains to be finalised.

1.3.3 Subject to the approval and any conditions placed on the grant of permission for the Hybrid Planning Application (HPA), construction is estimated to commence in 2027, with initial occupation of the secondary school anticipated in 2028, and the homes in 2029 and continuing until 2041. The proposed indicative phasing strategy of the Proposed Development is summarised in Table 1-2 below.

Table 1-2: Proposed Indicative Phasing Strategy

Phasing	No. of homes delivered	Class E (GEA m²)	Class F (GEA m²)	Class C1 (GEA m²)	Class B2 (GEA m²)	Class B8 (GEA m²)
Phase 1	0	0	0	0	0	0
Phase 2	1,249	16,128	634	4,400		
Phase 3	713	8,558			5,200	7,200
Phase 4	764	5,450				
Phase 5	274					
Total	**3,000**	**30,136**	**634**	**4,400**	**5,200**	**7,200**

1.4 Legislation, Policy and Guidance

1.4.1 This Outline SWMP has been prepared in line with the principles of international and national waste policy. All relevant legislation, planning policy and guidance is summarised in Appendix 1.

2. OUTLINE SITE WASTE MANAGEMENT PLAN (SWMP)

2.1 Introduction

2.1.1 This section of the report provides an Outline SWMP, which sets out the overarching principles of demolition and construction waste management. The Principal Contractor, once appointed, will develop the Detailed SWMP which would be implemented during the demolition and construction works, adhering to the principles set out within this Outline SWMP.

2.1.2 Good waste management contributes to meeting regulatory goals, the sustainability agenda and value for money. The Waste and Resource Action Programme (WRAP[1]) considers waste reduction and landfill diversions as ultimately cost saving opportunities, which should be implemented.

2.2 Aims of the Site Waste Management Plan

2.2.1 This Outline SWMP aims to establish a set of high-level objectives to help ensure that good waste management is adopted at an early stage and is maintained for the duration of the Proposed Development. The overarching aims of the Outline SWMP are to:

- Comply with legislation (as set out in Appendix 1);
- Set objectives for Site waste management;
- Assign roles and responsibilities for waste management;
- Increase resource efficiency and environmental performance; and,
- Protect the environment and the community.

2.2.2 This Outline SWMP also provides an overview of ways in which contractors would manage their waste in line with the waste hierarchy, and gives an initial review of potential waste arisings which would be expected as a result of the demolition and construction of the Proposed Development.

2.3 The Waste (England and Wales) Regulations 2011 (amended 2012)

2.3.1 The Waste (England and Wales) Regulations[2] transpose the EU revised Waste Framework Directive into national law in England and Wales and implement the waste hierarchy. In addition, the regulations establish duties in relation to the collection of waste and set requirements for planning authorities.

2.3.2 The Waste Hierarchy comprises five key waste management priorities – prevention, reuse, recycling, recovery and disposal, in that order of importance. Figure 2-1 provides further explanation of the Waste Hierarchy[3].

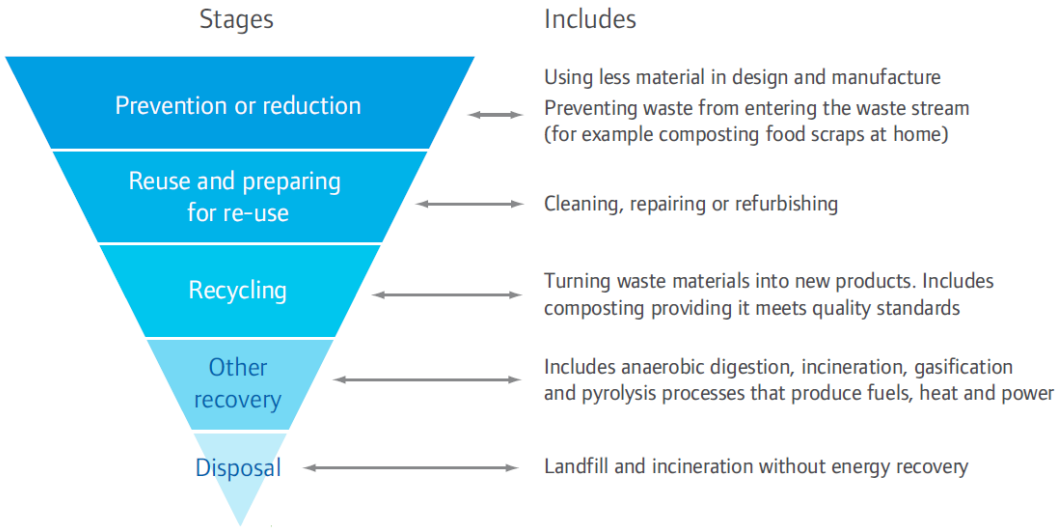

Figure 2-1: Waste Hierarchy

[1] WRAP is a registered charity with a mission to accelerate the move to a sustainable resource-efficient economy. http://www.wrap.org.uk/ [Accessed 09/06/2021]

[2] Secretary of State, 2011. The Waste (England and Wales) Regulations 2011, (as amended). London: The Stationery Office

[3] Source: The Mayor's Municipal Waste Management Strategy, November 2011 – page 51. (Government Review of Waste Policy in England, June 2011)

2.3.3 Schedule 1 of the Regulations states that measures must be taken to ensure that by 2020:

- at least 70% by weight of construction and demolition waste is subjected to material recovery.
- This target has not yet been updated since 2020 however it is still referenced as one for construction and demolition waste.

2.4 Proposed Construction and Demolition Waste Objectives

2.4.1 A list of proposed waste objectives for the Outline SWMP is provided in Table 2-1. These are based on policy framework, best practice guidance and professional judgement.

Table 2-1: Proposed Waste Objectives

No.	Objective	Basis
1	Waste should be managed in line with the Waste Hierarchy.	Priority must be given to waste prevention, followed by reuse on-Site, efficient recycling, recovery and disposal as a last resort.
2	Waste should be managed following a good practice approach.	The Applicant (or relevant developer at reserved matters application stage, hereafter referred to as the 'Relevant Applicant') should adopt an increased emphasis on the upper levels of the waste hierarchy (waste prevention and reuse on-Site) and the development of effective systems (e.g. Key Performance Indicators (KPIs)) to implement and monitor the SWMP.
3	Waste should be managed as sustainably as possible.	When identifying suitable waste management options, the Relevant Applicant should take into consideration the relative economic, social and environmental advantages and disadvantages of the options available.
4	The project should aim to divert as much waste as possible from landfill through prevention, reuse, recycling and recovery where practicable. At an appropriate stage prior to the start of works on-Site, the Principal Contractor should set a target for diversion from landfill. Anticipated at this stage to be between 70% and 90%.	Estimated volumes of excavation arisings are to be confirmed by the Principal Contractor at a later stage; however, excavation arisings are anticipated to constitute a significant proportion of waste arising from the development. Securing the reuse or recycling of this waste stream would allow a high landfill diversion target to be achievable. Diversion should be achieved by waste prevention and reuse, recycling and recovery on or off-Site. Actual waste arisings and reuse, recycling and recovery would be documented in the Detailed SWMP as it is updated by the Relevant Applicant during the construction phase. The actual performance should be compared against the expected waste arisings and the original Detailed SWMP and any deviation from the Detailed SWMP explained. Indicative recycling targets would be utilised. The Detailed SWMP must identify and prioritise expected waste streams with high recycling potential and use indicative recycling targets to drive recycling performance and provide a monitoring benchmark.
5	Minimise greenhouse gas emissions.	The Detailed SWMP should take into account the wider sustainability agenda, considering energy/ fossil fuel consumption and the overall efficiency of recycling and recovery operations, including transport.
6	Waste should be managed with due regard for Health and Safety.	Waste management has a significant interface with health and safety. Health and safety must be taken into account when assessing waste management options and where necessary may be an overriding factor in determining waste management options.

2.5 Roles and Responsibilities

2.5.1 It is important to set out the roles and responsibilities of the various parties involved with the demolition and construction of the Proposed Development to ensure that waste management obligations are managed effectively from the start of the demolition/construction process.

2.5.2 Table 2-2 summarises the key roles and responsibilities to be defined during the Proposed Development and implementation of the Detailed SWMP. A copy of the Detailed SWMP would be kept at the Site for reference and must be accessible to all Site operatives.

Table 2-2: Summary of Roles and Responsibilities to be Defined in the SWMP

Party	Description	Responsibility
The Relevant Applicant	Relevant Applicant (i.e. relevant developer at reserved matters application stage).	The Relevant Applicant is responsible for the Detailed SWMP. The Detailed SWMP would need to include a joint declaration between the Principal Contractor and the Relevant Applicant to ensure that the waste Duty of Care is complied with and to take all reasonable steps to ensure that materials are handled efficiently, and waste is managed appropriately.
Waste coordinator (on behalf of the Relevant Applicant)	Waste Coordinator Appointing a waste coordinator is not a legal requirement; however, it would ensure that the waste objectives are met.	The Relevant Applicant is responsible for the appointment of a waste coordinator. Appointment of a waste coordinator would initiate the Detailed SWMP process early and drive the waste objectives during the detailed design.
Relevant directors and managers within the project team	This is not a legal requirement but in practice, the relevant team leaders would need to approve the Proposed Development's waste objectives identified in the project waste strategy and the Detailed SWMP, which would need support from both top down and bottom up.	Good practice promotes the early adoption of the Detailed SWMP by the design team so that waste minimisation can be optimised throughout the design process. Where necessary, any design developments would be reflected in the Detailed SWMP.

2.6 Encouraging Better Resource Efficiency

2.6.1 WRAP provides detailed guidance for the construction sector on how to achieve better resource efficiency in construction. There are many examples and practical information on how to achieve standard, good and best practice. Appendix 2 of this report provides a summary of some standard, good and best practice measures for waste management which would be incorporated into the Detailed SWMP where appropriate.

2.6.2 The Relevant Applicant will establish a good practice approach to waste management for the demolition and construction of the Proposed Development.

2.6.3 The Detailed SWMP would record any early decisions, design changes, construction methods, transportation arrangements, materials sources or material specifications which have helped to minimise waste arisings on-Site to track waste prevention and reduction decisions.

2.6.4 Waste prevention is at the top of the waste hierarchy and should be a priority throughout the demolition and construction process, not only during the early stages. Waste would be minimised at source through design of the Proposed Development and throughout careful planning of demolition and construction activities.

2.6.5 Effective waste segregation on-Site should be a priority, and waste would be separated into inert, non-hazardous and hazardous. Separating these waste streams at source would reduce the amount of construction and demolition waste sent to landfill. Waste segregation would facilitate the reuse and recycling of wastes and reduce the likelihood of contamination.

2.6.6 Table 2-3 details the recommended measures to minimise Site waste arisings, including whether the measures are likely to achieve standard, good or best practice according to WRAP guidance. The Principal Contractor, once appointed, would review and implement appropriate measures, this would as a minimum include the standard practice measures.

Table 2-3: Recommended Waste Minimisation Measures

Summary of Recommended Minimisation Measures		**Standard Practice**
		Good Practice
		Best Practice
Use of prefabricated elements, where possible	It is recommended that where appropriate components are prefabricated off-Site, so that on-Site waste arisings, associated transportation and space/ storage implications would be minimised. Prefabricated components would generate less on-Site wastage through off-cuts and storage damage. Prefabricated components would be sourced from a supplier that recycles off-cuts and materials at the pre-fabrication site, otherwise, this measure offsets the waste arisings from one location to another.	
Minimising waste by optimising the design for Reuse on or off Site	Where possible opportunities to reuse materials from the demolition of the existing buildings and infrastructure on-Site would be explored. This could include for example the use of crushed concrete as fill material and topsoil for green landscaping areas and ponds. The Relevant Applicant would also consider reusing materials from other projects in the local area for the construction of the new buildings or earthworks and the reuse of materials from the demolition process at other sites.	
Minimisation of contaminated land arisings	If encountered on-Site, contamination would be remediated and reused on-Site or, if found to pose no risk to identified receptors (e.g. environment and human health), it should be left undisturbed. The latter can minimise potentially unnecessary transportation and disposal costs. This approach would be taken only if it does not pose any risk to the environment or harm sensitive receptors. The Principal Contractor would be required to include methods to contain contamination within the Detailed Construction Environmental Management Plan (CEMP).	
Sub-contractor targets	The Relevant Applicant would also consider setting off-cut/surplus targets for sub-contractors with a positive incentive scheme for on-Site waste champions. Good practice suggests that a 3% wastage rate based on the total amount of construction material handled on-Site is achievable.	
Avoiding over-purchasing and accurate delivery times	Over-purchasing can lead to significant wastage and should be avoided in the first place.	
Education and awareness	Waste minimisation would be underpinned by education and awareness throughout all levels of the project team, from the design team to Site contractors who would handle the construction materials. Personnel would receive awareness training via Site inductions and tool-box talks which all contractors and Site workers would attend before working on-Site. Records of training received would be retained.	
Consideration of End of Life materials	Consideration would be given to what would happen to the specified materials when they reach the end of their useful life. Where possible, elements would be designed for repair, modular repair, recycling at end-of-life or safe disposal. The use of hazardous materials in particular would be avoided. Buildings and infrastructure should be designed for robustness and minimum maintenance as far as possible.	
On-site recording of materials	The Detailed SWMP would be continuously monitored and reviewed. The Relevant Applicant would be fully compliant with their waste Duty of Care responsibilities (e.g. Keeping a record of waste transfer notes). The amount of waste produced and the recycling potential of each waste stream in relation to the total levels generated	

Summary of Recommended Minimisation Measures		Standard Practice Good Practice Best Practice
	throughout the project would be monitored. Over the course of the project, individual waste streams would be monitored to ensure that the expected level of recycling is achieved. Reasons for deviations from the plan would be established, such as high levels of contamination, poor Site discipline or poorly organised logistical management of skips. Where possible, procedures or systems to improve performance would be defined and adopted as part of the SWMP process.	
Use of coloured skips or shipping containers	An industry led colour coding scheme has been devised by the Institution of Civil Engineers for use in the construction industry[4]. The use of colour coded skips or waste containers on-Site would be considered to help ensure that construction workers are clear about where to put each type of waste. This would reduce the potential for contamination in the skips and decreases the likelihood that a load would be rejected when sent off-Site for reprocessing. In cases where the load is rejected, the likely destination would be landfill. Typical skips and colours for individual waste streams would usually comprise: • Mixed waste (black); • Inert waste (grey); • Gypsum (white); • Metals (blue); • Packaging (brown); • Hazardous (orange); and • Timber (green).	
Packaging waste	Packaging materials brought onto construction sites should be minimised as much as possible through optimisation of the supply chain, for example through bulk deliveries and supplier take-back agreements. Any packaging waste arising on-Site should be sorted as much as possible according to waste streams that can be collected, such as plastics, wood, cardboard, metal.	
Minimise transportation	Minimising transport distances to waste sorting and recycling facilities will reduce the carbon emissions associated with waste handling. Bulky materials such as crushed concrete which can be reused should not be transported by road over large distances; nearby site for reuse should be identified.	

2.7 Initial Review of Expected Waste Arisings

2.7.1 This section summarises the anticipated waste streams (based on information available at the time that this Outline SWMP was produced) and outlines recommended management options based on the constraints and opportunities of the Proposed Development.

Demolition

2.7.2 Figure 2-2 below shows the buildings that have been identified to be demolished for the Proposed Development. Based on the material volume of buildings to be demolished, the total waste for the demolition phase is estimated at approximately 2,031.23 m³. Details of the specific building construction materials for the buildings proposed to be demolished are not available at the time of writing this Outline SWMP.

4 Managing packaging waste on your construction site. Envirowise, Carillion plc Eco3, EJ Badekabiner, Kier Eastern, Lindum Group, National Green Specification, Skanska, WRAP. 2006. Available online: http://greenbuildingencyclopaedia.uk/wp-content/uploads/2015/11/EnvirowiseGG606.pdf [Accessed 11/06/2021]

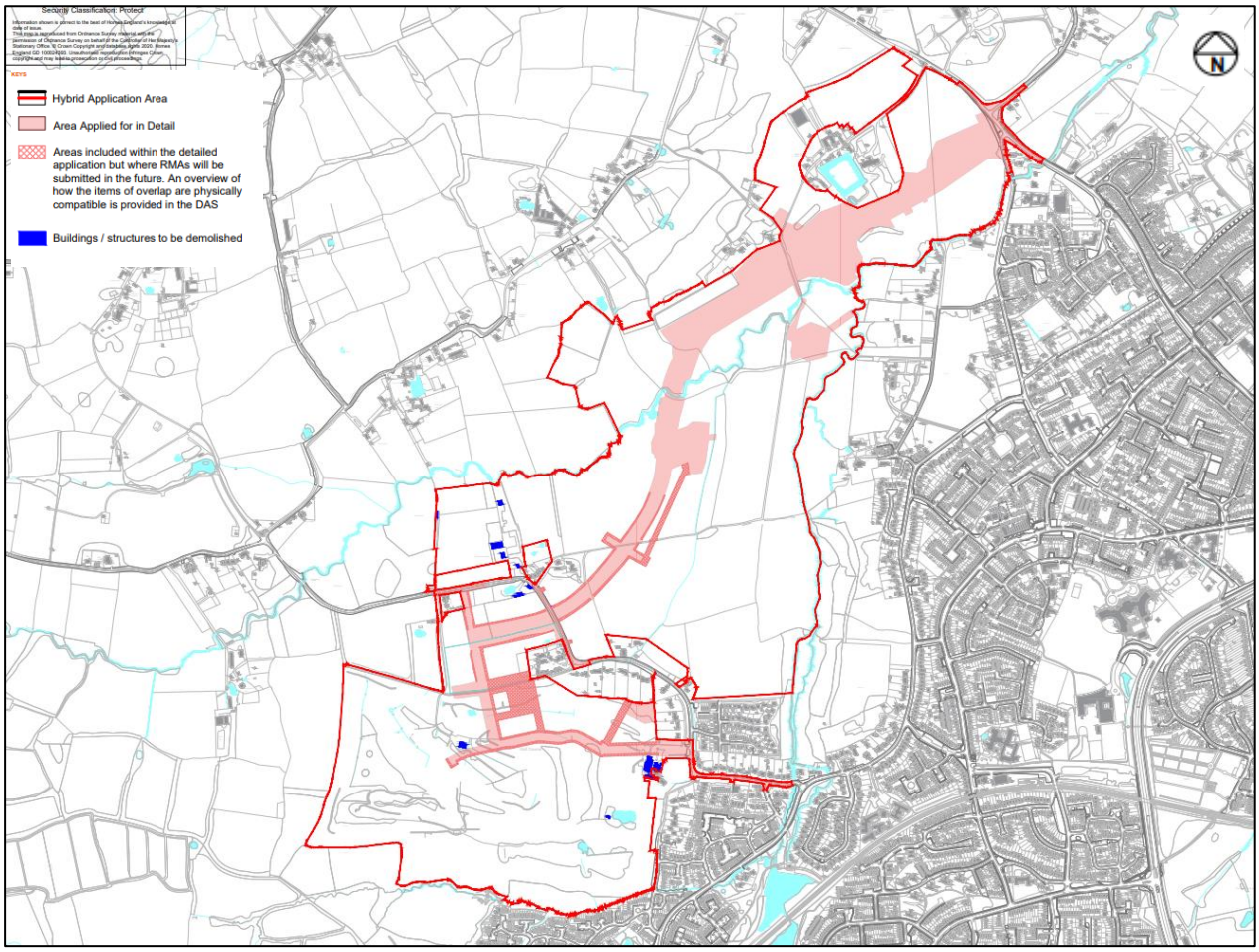

Figure 2-2: Demolition Plan for the Proposed Development. (WOI-HPA-PLAN-DEM-01)

2.7.3 As noted within Arcadis' Earthworks strategy[5], it is proposed that following completion of demolition surveys and where suitable, an estimated quantity of approximately 1,058 m³ of materials would be crushed and reused as engineered fill for Phase 1 of the Site. The proposed waste management strategy (i.e. anticipated proportion available for reuse on-Site, sent off-Site for recycling, or proportion disposed at landfill) for the demolition waste for the entire Site has not been finalised. This will be confirmed by the Principal Contractor once appointed.

Excavation

2.7.4 It is expected that cut and fill operations would be balanced within the Proposed Development, to encompass the entire Site.

2.7.5 It is estimated that Phase 1 would generate approximately 49,973 m³ of material and require approximately 39,660 m³ of additional fill material. These earthworks calculations are based on a comparison of the current formation surfaces for the design elements versus the existing Site following the topsoil strip.

2.7.6 The extent of Site won material that may be reused on the Site for Phase 1 has been informed by the findings of previous ground investigation for the wider Site[6]. All material except made ground is deemed suitable for reuse on Site for Phase 1, and a working estimate of the expected volume of made ground in the arisings has been made based on the assumption that 10% of Site won material for Phase 1 is unsuitable for re-use.

[5] Arcadis. 2023. West of Ifield Earthworks Strategy. October 2023. Report REF: 10051123-ARC-060-ZZ-TR-CE-00001-P02 Phase1_Earthworks_Strategy

[6] Ground Investigation by Geosphere Environmental (Ref: 6071,SI,GROUND,GF,SG,JD,22-04-22,V2, dated 22/04/2022) and Ground Investigation and Geotechnical Design by Arcadis (10051123-ARC-010-1A-TR-GE-00001)

2.7.7 Future secondary, tertiary roads and development parcels are expected to be constructed with a balance of cut and fill within each parcel and along each road. These quantities will be confirmed by the earthworks contractor prior to commencement of works.

2.7.8 Quantities of topsoil estimated to arise during excavation works for Phase 1 is estimated to be approximately 51,295 m³. For the entire Site works, topsoil should be stored for reuse in green landscaping areas etc. In accordance with the mitigation measures stated in the ES Volume 1 Chapter 6: Agriculture and Soils, the quality and quantity of soil resources (topsoil and subsoil) available for reuse at the Site would be identified and safeguarded on Site as part of a Soil Management Plan and included within a detailed CEMP as part of the future reserved matters applications or relevant planning condition. The quantity of topsoil available for reuse at the Site is not yet known, as the volume of topsoil required for landscaping areas is not confirmed at the time of writing this Outline SWMP. This will be developed during detailed design.

Construction

2.7.9 Using BRE Waste Benchmark Data[7] and Gross Internal Area (GIA)[8] provided by the Client, the construction waste for the Proposed Development is estimated at approximately 57,052 m³ or 56,128 tonnes, as summarised in Table 2-4. These quantities are only high-level estimates and will need to be confirmed by the Principal Contractor within the Detailed SWMP.

Table 2-4: Construction Waste Calculations Using BRE Waste Benchmark Data

Floorspace	Benchmark Average m³/100m²	Benchmark Average Tonnes/100m²	Construction Waste (m³)	Construction Waste (tonnes)
Residential (249,492 m² GIA)	18.1	16.8	45,158	41,915
Commercial, Hotel and Community Spaces (43,319 m² GIA)*	19.8	23.8	8,577	10,310
Educational (13,754 m² GIA)	19.8	23.8	3,317	3,904
Total (Estimate)			**57,052 m³**	**56,128 tonnes**
*based on a worst case scenario, with solely general business use being built out in the River Valley Employment Zone (i.e. no industrial spaces)				

2.7.10 There are established waste management options available in and around the West Sussex area for each key waste stream that is likely to be generated during the demolition and construction stages. These include options for reuse, recycling, and treatment of waste streams in line with the waste hierarchy. Reuse of materials is partly dependant on concurrent construction operations within a reasonable distance from the Site.

2.7.11 It would be the responsibility of the Relevant Applicant to confirm the waste streams, anticipated volumes and suitable management options upon appointment and up to the point of commencing construction. In addition, the Relevant Applicant would ensure that any additional requirements such as waste licenses or permits are obtained to ensure full compliance with relevant legislation.

2.7.12 The options identified in Table 2-5 are presented as suggestions for consideration. Some of these options may not prove to be practicable due to Site or programme constraints. It would be the responsibility of the Relevant Applicant to identify the practicability of whether certain waste materials are reused or recycled.

[7] Smartwaste bre. BRE Waste Benchmark Data. Issued 26th June 2021.

[8] Where GIA was not available, an assumption was made to convert GEA (using factor 0.91) to GIA.

Table 2-5: Main Anticipated Waste Streams during the Demolition Works, Site Set-up and Construction Works

Waste Stream Anticipated	European Waste Code(s)	Source of Production	Anticipated Quantities of Waste Arising[9]	Divert Waste from Landfill Potential %[10]	Management Options
Mixture of Concrete, Bricks, Tiles and Ceramics from Made Ground, demolition works and building works	17 01 07	Waste from the removal of hardstanding and demolition works. Also, excess concrete, broken ceramics and bricks from the construction process.	Amber	90	Concrete, ceramics and brick have good potential for reuse on-Site. Excess material can be collected in skips and taken off-Site for reprocessing and for reuse on other construction projects, preferably in the local area. Opportunities would be sought for the reuse of materials on other construction projects with overlapping schedules. The Relevant Applicant would explore opportunities for recycling in the local area, if practicable. The Relevant Applicant would ensure that the waste is being taken to appropriate waste treatment facilities rather than landfill, where possible.
Soil (including potential for contaminated excavated material)	17 05	Excavations as part of Site levelling, foundation works and enabling works prior to construction	Amber	75	Excavated soil would be assessed in terms of its suitability for reuse on-Site and a Materials Management Plan developed to facilitate reuse, as described in the mitigation in ES Volume 1 Chapter 6: Agriculture and Soils. Material that is not deemed suitable for reuse would need to be appropriately remediated or disposed of off-Site at a suitable facility. The Relevant Applicant would minimise exporting soil off-Site where possible to reduce unnecessary lorry movements.
Wastes from electrical and electronic equipment	16 02	Potential cabling/ old light fittings etc. from demolition works or wastage from construction works	Minimal	100	Waste electrical and electronic equipment can be recycled at an appropriate waste treatment facility within the local area.
Metals	17 04	Likely to comprise predominately steel or aluminium from demolition of buildings on-Site (details of the construction materials of buildings to be demolished have not been provided to Ramboll at present).	Amber	100	The Relevant Applicant would explore opportunities for reuse/ recycling of these materials in the local area. Both ferrous and non-ferrous metals can be recovered on-Site, contained in identifiable skips and taken off-site for reprocessing at the appropriate facility.

[9] Red = High, Amber = Medium, Green = Minimal amount of waste produced

[10] Red = Majority of waste sent to landfill, Amber = 50% of waste sent to landfill, Green = Majority of waste diverted from landfill

Waste Stream Anticipated	European Waste Code(s)	Source of Production	Anticipated Quantities of Waste Arising[9]	Divert Waste from Landfill Potential %[10]	Management Options
Other construction and demolition wastes	17 09	Assorted construction and demolition wastes	Amber	75	Assorted waste streams can be separated and recycled at an appropriate facility in the local area. The Relevant Applicant would explore suitable options for reuse or recovery of other construction and demolition wastes in the local area.
Packaging waste	15 01 04 (metal) 15 01 01 (paper/ card) 15 01 02 (plastic) 15 01 03 (wood)	Packaging for the transportation of materials and pre-fabricated components.	Minimal	75	Packaging waste can be recycled at an appropriate waste treatment facility in the local area. Timber could be recycled or recovered locally. The Relevant Applicant would identify suitable options for recycling or recovery of timber locally.
Wood, glass and plastic	17 02	From demolition works	Minimal	50	Identifiable skips would be provided for any separated waste streams. The Relevant Applicant would explore suitable options for reuse or recovery in the local area where possible.
Trees and green waste	20 02 01	From the removal of limited vegetation and trees on-Site	Minimal	100	Green waste can be composted at an appropriate waste treatment facility in the local area. Timber could be reused or recovered locally. The Relevant Applicant would explore suitable options for the reuse or recovery of timber locally.
General waste generated on site	20 01 08 (food waste) 20 01 01 (paper/ card) 20 01 39 (plastics) 15 01 04 (metal cans) 20 03 01 (mixed waste)	Generation of waste from the use of the Site office and site compound	Minimal	50	Likely to comprise of small volumes of recyclable and non-recyclable materials. Consideration would be given to providing separate bins for the collection of recyclable and non-recyclable materials. Good potential for recycling off-Site exists at waste treatment facilities in the local area. The treatment facility to receive the general waste and requirements for segregation would be confirmed prior to the start of construction.

Waste Stream Anticipated	European Waste Code(s)	Source of Production	Anticipated Quantities of Waste Arising[9]	Divert Waste from Landfill Potential %[10]	Management Options
Insulation materials and asbestos-containing construction materials	17 06	Insulation materials from the demolition of existing buildings and excavation works with unknown made ground	Medium	25	Insulation materials would be disposed of at an appropriate waste treatment facility in the local area. Some recycling of insulation materials may be possible. Workers would be aware of the possibility of finding asbestos and other contaminant containing materials in made ground on Site following the conclusions of a ground investigation, once undertaken.
Hazardous Waste	Various waste codes dependant on the chemical properties and description of the waste	Arisings from made ground and demolition works	Minimal	25	Hazardous waste minimisation through avoiding such materials would be prioritised. No hazardous materials would be specified for use for the Proposed Development. Specified paints etc. would be non-hazardous. Any hazardous waste from the demolition works would be transported to a suitable waste treatment facility in the local area.

2.8 Duty of Care Compliance

2.8.1 One of the key aims of using a SWMP is to protect the environment, for example through the reduction of fly-tipping of construction materials. It is a requirement under The Waste (England and Wales) Regulations 2011 (amended 2012) for compliance with the Duty of Care Code of Practice to incorporate an auditable system that identifies the following:

- The person responsible for removing the waste from the Site;
- Copies of all Duty of Care documentation (i.e. waste transfer notes and hazardous waste consignment notes) identifying:
    - Details of the waste streams contained in that particular load;
    - Where it is being taken to;
    - Name and address of transfer or transferee;
    - Time and date of transfer and be signed;
    - Quantity of waste removed;
    - A declaration that the waste hierarchy has been applied; and
    - Standard Industrial Classification (SIC) Code.
- Records of all the licensed waste carriers who have collected arisings during the project (e.g. registration numbers).

2.9 Training and Communication

2.9.1 All Site workers would receive training to enable them to identify their roles and responsibilities whilst handling waste arisings during the demolition and construction works. This would be in the form of inductions, workshops or tool-box talks.

2.10 Monitoring of Waste Arisings

2.10.1 One of the outcomes of the Detailed SWMP would be the production of a record of waste arisings generated during demolition and construction activities, to enable the Relevant Applicant to compare what was actually generated against the original estimate. This estimate would be included within the Detailed SWMP. Information from the actual waste arisings would be obtained from the Duty of Care compliance records (e.g. waste transfer notes) and should provide a breakdown of the following:

- Quantity of each waste stream generated; and
- Breakdown of waste quantities reused, recycled, recovered or disposed of at landfill, all against the targets set beforehand.

2.11 On-going Review of Implementation

2.11.1 The Detailed SWMP would be updated as the demolition and construction of the Proposed Development progresses, as this would help to identify which waste streams are not achieving their anticipated recycling potential, so that alternative methods to handle that waste stream could be explored for the remainder of the project. The Detailed SWMP would be reviewed at least once every six months or more frequently if required, for example when there are changes to the project.

3. SUMMARY AND CONCLUSION

3.1 Outline Site Waste Management Plan

3.1.1 This Outline SWMP provides the opportunity to steer the direction of waste management and ensure good practice is adopted for the demolition and construction works of the Proposed Development.

3.1.2 It is considered that the proposed waste streams that are anticipated to be generated during the demolition and construction works have a high potential to be diverted from landfill.

3.1.3 It is expected that cut and fill operations would be balanced within the Proposed Development, to encompass the entire Site. A minimal number of buildings across the Site have been identified for demolition, and the total waste for the demolition phase is estimated to constitute a relatively small volume.

3.1.4 The Proposed Development is to be constructed in a phased approach, with construction commencing in 2027 and continuing until 2041. The phased nature of the development is anticipated to support waste segregation and management, in particular owing to space allowance on-Site compared to relatively space-constrained sites, leading to greater opportunity to divert wastes from landfill and increase recycling rates.

3.1.5 It is expected that the Relevant Applicant would adopt the recommendation measures included within this Outline SWMP and that these would be incorporated into the Detailed SWMP(s) as plots are developed and built out.

APPENDIX 1
INTERNATIONAL, NATIONAL AND REGIONAL LEGISLATION, POLICY AND GUIDANCE

1. Key National Legislation

Environmental Protection Act 1990

The Environmental Protection Act 1990[11] is the primary legislation in UK waste management and provides the structure and authority for waste management and the control of pollution. Requirements are outlined for waste storage, treatment and disposal and controls for impacts of waste storage such as dust and odour are set out in the Act. It is separated into six parts as follows:

- Part I – Prescribed processes and substances;
- Part II – Disposal of controlled waste on land;
- Part IIA – Contaminated land;
- Part III – Statutory nuisances;
- Part IV – Litter;
- Part V – Amendment to the Radioactive Substances Act 1960; and
- Part VI – Genetically modified organisms.

Environmental Permitting (England and Wales) Regulations 2010

The Environmental Permitting (England and Wales) Regulations[12] (as amended) provide a system of environmental permitting for a wide range of potentially polluting activities. The regulations apply to certain types of waste operation for the recovery, treatments or disposal of waste e.g. landfilling.

The Waste (England and Wales) Regulations 2011 (amended 2012)

The Waste (England and Wales) Regulations[13] transpose the EU revised Waste Framework Directive into national law in England and Wales and implement the waste hierarchy. In addition, the regulations establish duties in relation to the collection of waste and set requirements for planning authorities.

The Waste Hierarchy comprises five key waste management priorities – prevention, reuse, recycling, recovery and disposal, in that order of importance. Figure A1 provides further explanation of the Waste Hierarchy[14].

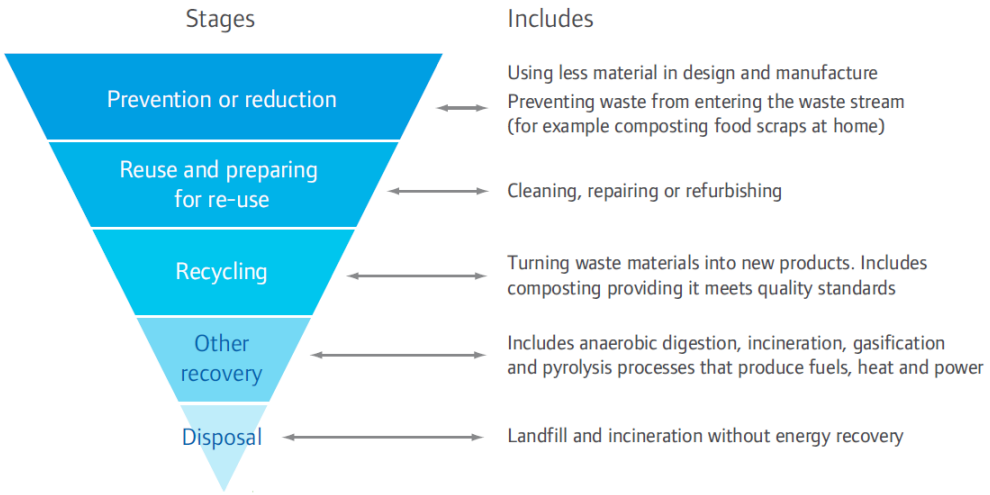

Figure A1: Waste Hierarchy

[11] Secretary of State, 1990. Environmental Protection Act 1990. London: The Stationery Office
[12] Secretary of State, 2010. Environmental Permitting (England and Wales) Regulations 2010. London: The Stationery Office
[13] Secretary of State, 2011. The Waste (England and Wales) Regulations 2011, (as amended). London: The Stationery Office
[14] Source: The Mayor's Municipal Waste Management Strategy, November 2011 – page 51. (Government Review of Waste Policy in England, June 2011)

From 1 January 2015, the Waste Regulations require waste collection authorities to collect wastepaper, metal and plastic separately for household, commercial and industrial waste.

Schedule 1 of the regulations states that measures must be taken to ensure that by 2020:

- at least 50% by weight of waste from households is prepared for re-use or recycled; and
- at least 70% by weight of construction and demolition waste is subjected to material recovery.

Clean Neighbourhoods and Environment Act 2005

Part 5 of the Clean Neighbourhoods and Environment Act 2005[15] covers legislation on waste transportation, deposit and disposal and site waste management plans, with a view to ensuring a clean environment as far as possible.

List of Wastes (England) Regulations 2005

The List of Wastes (England) Regulations[16] provides a classification system for waste streams. Different waste materials are assigned a code that must be quoted during the transfer of waste as a legal requirement. This classification system provides a consistent method of classifying and recording waste that in turn allows for better waste management services and reporting. The list has approximately 800 different waste entries including hazardous wastes.

Hazardous Waste (England and Wales) Regulations 2005 (as amended)

The Hazardous Waste (England and Wales) Regulations[17] outline the controls on those producing, transporting or disposing of hazardous waste. The regulations are a transposition of the EC Hazardous Waste Directive (91/689/EEC as amended by 94/31/EC).

The Controlled Waste (England and Wales) Regulations 2012

The Controlled Waste (England and Wales) Regulations[18] classify waste as household, commercial or industrial and enable local authorities to charge for the disposal of waste from a wide variety of non-domestic premises. Revisions of the regulations have helped to determine the meaning of 'controlled waste' as defined in the Environmental Protection Act 1990 (Part II).

Environment Act 2021

The Environment Act 2021[19] is a landmark piece of environmental legislation passed by the UK Parliament, aiming to improve environmental governance and enhance environmental protections once UK left the European Union, replacing environmental regulations previously enforced at the EU level, with national laws.

Focusing on resource efficiency and waste reduction, the Environment act will deliver

- Extend producer responsibility to make producers pay for 100% of cost of disposal of products, starting with plastic packaging;
- A deposit Return Scheme for single use drinks containers;
- Charges for single use plastics;
- Greater consistency in recycling collections in England;
- Electronic waste tracking to monitor waste movements and tackle fly-tipping;
- Tackle waste crime;

[15] Secretary of State, 2005. Clean Neighbourhoods and Environment Act. London: The Stationery Office

[16] Secretary of State, 2005. The List of Wastes (England) Regulations. London: The Stationery Office

[17] Secretary of State, 2005. Hazardous Waste (England and Wales) Regulations (as amended), London: The Stationery Office

[18] Secretary of State, 2012. The Controlled Waste (England and Wales) Regulations. London: The Stationery Office

[19] Secretary of State, 2021. Environment Act 2021, London: The Stationary Office

- Power to introduce new resource efficiency information (labelling on the recyclability and durability of products);
- Regulate shipment of hazardous waste; and
- Ban or restrict export of waste to non-OECD countries.

To drive down the amount of waste produced and encourage reuse and recycling, the Environment Act introduces and environmental target to halve residual waste (Excluding major mineral wastes) kg per person by the year 2042.

The Aggregates Levy

The Aggregates Levy[20] is intended to encourage a shift in demand from primary aggregates towards alternative materials such as recycled aggregate. This is a tax on sand, gravel and rock that has either been excavated from the ground, dredged from the sea in UK waters or imported. HM Revenue and Customs (HMRC) are notified every quarter on how much primary aggregate has been produced or sold and there is a levy of £2.03 (as of 1 April 2024) per tonne of sand, gravel or rock[21]. The rate will increase to £2.08 per tonne from 1 April 2025.

The Waste (Circular Economy) Regulations 2020

3.1.6 The UK began to implement the Circular Economy Package (CEP) on 1 October 2020. Amendments contained in the Waste (Circular Economy) (Amendment) Regulations[22] will see the CEP implemented in England and Wales, and partially in Scotland and Northern Ireland.

3.1.7 The CEP is mainly focused on increasing resource efficiency, aiming to make sure that fewer resources are sent to landfill when they could be reused or recycled instead. Moving towards a circular economy will result in an optimisation of resources and also increase a product's life. Some companies across the UK have already begun to implement their own circular economy policies, which focus on bringing resources back into the company once a product has reached its end-of-life so that parts can be reused or repurposed for new products.

3.1.8 The amendments introduced by the Waste (Circular Economy) (Amendment) Regulations aim to:

- specify when a separate collection of waste is not necessary;
- ensure any waste collected separately that can be prepared for reuse or recycling is not incinerated or landfilled;
- introduce an environmental permit condition on waste incinerators and landfills which restrict waste (paper, metal, plastic and glass), which is collected separately for re-use or recycling, from being accepted for incineration or landfill;
- make sure unlawfully mixed hazardous waste is separated wherever technically feasible;
- prohibit the mixing of waste oils where the mixing will prevent the regeneration or recycling of the oil delivering an equivalent or better environmental outcome; and
- require relevant waste operators, operating under a registered waste exemption, to record, retain and submit information on hazardous waste and the products and materials resulting from the treatment of that waste.

[20] H. R. a. Customs, "Aggregates Levy," 20 December 2016. [Online]. Available: https://www.gov.uk/guidance/aggregates-levy-returns-records-and-appeals

[21] "Environmental taxes, reliefs and Proposed Schemes for businesses," [Online]. Available: https://www.gov.uk/green-taxes-and-reliefs/aggregates-levy

[22] The Waste (Circular Economy) (Amendment) Regulations 2020," 1 October 2020. [Online]. Available: https://www.legislation.gov.uk/uksi/2020/904/made

2. National Planning Policy, Guidance And Standards

National Planning Policy Framework 2024

The National Planning Policy Framework (NPPF)[23] acts as guidance for local planning authorities and decision makers for drawing up plans and making decisions on planning applications. The NPPF does not contain specific policies for waste, as the national waste policy is published as part of the National Waste Management Plan for England.

National Planning Policy for Waste 2014

The National Planning Policy for Waste was published in October 2014. It sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management, in conjunction with the NPPF. It is primarily intended for use by local authorities when determining waste policies within local plans. These policies in turn influence the requirements of developments.

Waste Management Plan for England 2013

The Department for Environment, Food and Rural Affairs (Defra) published a Waste Management Plan for England[24] in December 2013. The plan provides a high level analysis of the current waste management situation in England and fulfils the requirements set under Article 28 of the revised WFD and Schedule 1 of Waste Regulations 2011. The plan does not introduce any new policies but aims to collate all current waste management policies into one national plan.

Government Review of Waste Policy in England 2011

The Government Review of Waste Policy[25] in England provided an overall strategic review of waste policy in England and provided commitments on improving a wide range of waste management aspects including (but not limited to):

- Prioritise efforts to manage waste in line with the waste hierarchy and reduce the carbon impact of waste;
- Develop a range of measures to encourage waste prevention and reuse, supporting greater resource efficiency; and
- Develop voluntary approaches to cutting waste, increase recycling, and improve the overall quality of recycled material, working closely with business sectors and the waste and material resources industry.

The commitments made in the review are broadly split between improvements to the sustainable use of materials and improvements of services to householders and businesses.

Resources and Waste Strategy for England 2018

The Resources and Waste Strategy for England[26] sets out how England will preserve its stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. It provides a clear linger-term policy direction in line with the 25 Year Environmental Plan[27], which broadly seeks to:

i. Ensure that resources are used more efficiently and kept in use for longer to minimise waste and reduce its environmental impacts by promoting reuse, remanufacturing and recycling;

[23] Department for Communities and Local Government, 2024. National Planning Policy Framework. London
[24] Defra, 2013. Waste Management Plan for England
[25] Defra, 2011. Government Review of Waste Policy in England 2011
[26] Defra, 2018. Resources and Waste Strategy. Available at: https://www.gov.uk
[27] HM Government (2018) 'A Green Future': Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk

ii. Work towards eliminating all avoidable waste by 2050 and all avoidable plastic waste by the end of 2042; and
iii. Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

The Waste prevention programme for England: Maximising Resources, Minimising Waste 2023

This policy[28] builds on the 2018 Resources and Waste Strategy, aiming to eliminate avoidable waste by 2050. It emphasizes the need to maximize resource use and minimize waste due to finite resources and environmental concerns and sets out the priorities for action to manage this in accordance with the top layers of the waste hierarchy - prevention and reuse. The key themes surrounding this policy include:

i. Designing out waste: Including eco-design and consumer information requirements, and Extended Producer Responsibility schemes.
ii. Systems and services: Including collection and take-back services, encouraging reuse, repair, leasing businesses and facilities.
iii. Data and information: including materials databases, product passports (sets of data, unique to the specific product that can be accessed online and give detailed information on, for example, contained materials, components and history, to support improved outcomes such as higher quality recycling) and voluntary corporate reporting.

Key sectors have been selected for action include Construction, textiles, furniture, electronics, vehicles, plastic and packaging and food.

3. Local Planning Policy

Horsham District Planning Framework (excluding South down National Park) 2015
The Horsham District Planning Framework (HDPF)[29] is the overarching planning document for Horsham District, outside the South Downs National Park. It sets out the long-term spatial vision, objectives, and strategy for the district, providing a framework for delivering development up to 2031. Under Policy 2 – Strategy Development, the framework states that West Sussex County Council is responsible for preparing statutory land use plans for minerals and waste.

West Sussex County Council Waste Local Plan 2014, reviewed 2024

The West Sussex County Council Waste Local Plan[30] provides the basis for consistent land-use planning decisions about planning applications for waste management facilities until 2031. The Waste Local Plan, adopted in 2014, provides the background to waste in West Sussex, including types of waste, roles and responsibilities in waste management, assumptions about waste arisings, current waste management capacity within the County, the importation and exportation of waste, capacity shortfalls and the implications for the Plan. The Plan makes reference to the aspiration that West Sussex has a 'zero waste to landfill' by 2031; 'zero waste' is defined in the Plan as the disposal to land (via landfill or land raise) of less than 3% of the waste arising in the County. An assessment was undertaken in 2024[31] of which the outcome was that the plan remains relevant and effectively there no update is required.

[28] DEFRA, 2023. The Waste prevention programme for England: Maximising Resources, Minimising Waste. Available at: https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste/the-waste-prevention-programme-for-england-maximising-resources-minimising-waste
[29] Horsham District Council, 2015. Horsham District Planning Framework (excluding South down National Park). Available from: https://www.horsham.gov.uk/__data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf. [Accessed 14/02/2025]
[30] West Sussex County Council and South Downs National Park Authority, 2014. Sussex Waste Local Plan. Available from: https://www.westsussex.gov.uk/media/3241/waste_local_plan_april2014.pdf. [Accessed 14/02/2025]
[31] West Sussex County Council and South Downs National Park Authority. 2024. West Sussex Waste Local Plan (April 2014): Five-Year Assessment of Relevance and Effectiveness. Available from: https://www.westsussex.gov.uk/media/onmaxhlm/wlp_review_2024-2.pdf. [Accessed 14/02/2025]

APPENDIX 2
SITE WASTE MANAGEMENT PLANS: STANDARD, GOOD OR BEST PRACTICE

Source: WRAP Advanced Workshop on Site Waste Management Plans, March 2007

Activity	Standard	Good	Best
Duty of Care			
Documentation showing compliance with legal requirements			
Responsibility for waste management			
One person designated as overall waste champion			
Responsibility for individual areas designated to individuals			
Waste management contractors			
Dialogue to establish opportunities for recycling			
Contractual agreements with set targets and regular review			
Sub-contractors			
Agreements with subcontractors on how to manage waste			
Contractual agreements with set targets and regular review			
Identification of waste arisings and disposal routes			
Listed in SWMP before site work commences			
Opportunities for recycling and refuse identified prior to construction			
Waste minimisation included as part of the design; prefabrication, etc.			
Reuse of materials			
Inert materials			
Concrete, soils and inert materials, on and off site			
Reuse area on site for all materials			
Recycling of materials			
Metals and high value materials			
Wood, plasterboard, packaging and inert			
Takeback schemes with suppliers for surplus materials and packaging			
Site design, storage and logistics			
Layout and skip location considered at design stage			
Separate containers for hazardous waste			
Containers optimised for segregation with clear labels and signs			
Segregated containers at the workface; use of compacters and balers			
Clearly located and defined storage areas for materials			
Just in time delivery, secure storage areas, no double handling			
Training of workforce			
General information on waste in site induction and toolbox talks			
Specific training relating to environmental issues on site for key staff			
Feedback welcomed with relevant incentives			
Monitoring			
Skip costs monitored, action taken if too high			
Skip costs and volume data from waste management contractor			

Activity	Standard	Good	Best
Use of auditing tool such as Smart Waste			
Regular monitoring or volume/tonnage with reviews for action			
Targets			
Targets based on standard industry KPIs			
Targets based on internally developed KPIs			
Periodic review of performance, final review at project level			
Regular review during project, lessons embedded in company			

Key

- Activity not carried out
- Activity carried out occasionally or at low level
- Activity carried out thoroughly on all sites