

SITE WASTE MANAGEMENT PLAN

Land at Bolton on Dearne, Phase 2



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1. Introduction

This guidance has been produced to assist in the production of Site Waste Management Plans (SWMPs) and provide appropriate documentation to be submitted with planning applications to advise local authorities of how Gleeson Homes and Regeneration approach the legislation.

The requirement to prepare, update and implement a SWMP is set out in the Site Waste Management Plans Regulations 2008 which came into effect on 6 April 2008. In accordance with these regulations any client intending to carry out a construction project on one site with an estimated cost greater than £300,000 must, before work begins, prepare a SWMP. Under the transitional arrangements, if a project is planned before 6 April 2008 and the construction work begins before 1 July 2008 then the requirement to prepare and implement a plan does not apply. Evidence of 'planned project' may include planning consent, building regulations approval or relevant contract documents.

The plan must be implemented and then updated as construction proceeds, with a greater level of detail for projects that cost more than £500,000. Since this will cover the majority of our projects this guidance has been written to comply with the requirements for projects that cost more than £500,000. All waste transactions must be recorded or referenced in the plan to prevent the likelihood of fly-tipping. Finally, once the project is completed, the plan should be reviewed and must record the reason for any deviation from the planned arrangements.

An example Site Waste Management Plan template is provided in Annex A. However, as long as all information requirements in the Regulations are included, the layout of the plan can be varied to suit existing site management records.

1.1 The Purpose of Site Waste Management Plans (SWMPs)

SWMPs aim to address two key issues:

1. Improving materials resource efficiency

By promoting the economic use of construction materials and methods so that waste is minimised and any waste that is produced can be re-used, recycled or recovered in other ways before disposal options are explored; and

2. Reducing fly-tipping

By restricting the opportunities available for the illegal disposal of waste by ensuring compliance with existing legal controls and providing a full audit trail of any waste that is removed from the construction site.

Types of Waste

“Waste” is defined in Article 1(1)(a) of the Waste Framework Directive (2006/12/EC) and means “..any substance or object.. which the holder discards or intends or is required to discard”. All waste that falls within the scope of this definition should be recorded in the Site Waste Management Plan. “Holder” means “the producer of the waste or natural or legal person who is in possession of it”.

In a Site Waste Management Plan, as a minimum, we will need to classify any waste produced on the site as either **inert, non hazardous**, or **hazardous**.

Hazardous Waste

If the construction project is producing hazardous waste, before allowing any waste to be removed you must first notify the Environment Agency that you are a hazardous waste producer. If you need guidance on whether or not a specific waste is hazardous you should consult the Environment Agencys ‘Guidance on the interpretation of the definition and classification of hazardous waste (WM2)’

(See below link)

www.environment-agency.gov.uk/subjects/waste/1019330/1217981/1384307/

During the construction phase we will update the plan as waste is disposed of, reused, recycled, or otherwise recovered. In this way the SWMP will become a ‘living’ document that describes the current state of progress against the waste management forecasts contained in the plan.

When waste is removed from the site we, as principle contractor, will show in the SWMP that we are complying with the waste management licensing, waste duty of care and waste carrier registration regimes. The duty of care requires us to take care of our waste whilst in our control, check that the person whom we give out waste is authorised to receive it, complete, exchange and keep waste transfer notes when the waste is handed over and take all reasonable steps to prevent unauthorised handling or disposal of others. All registration and waste transfer documents should be kept in the SWMP or referenced plan.

Waste duty of care

The waste Duty of Care is a legal requirement under Section 34 of the Environmental Protection Act 1990. Detailed requirements for waste transfer notes are set out in the Environmental Protection (Duty of Care) Regulations 1991. A guide to these duties entitled 'Waste Management – the Duty of Care Code of Practice' was published by the Government in March 1996 and is available on the Defra website www.defra.gov.uk

In order to secure longer term improvements in materials resource efficiently, we will:

- Review performance against the SWMP following completion of the project.
- Describe in the plan any deviation between the first draft of the SWMP and the final outcome.
- Confirm that the plan has been periodically updated. A quarterly review will be carried out at the minimum.
- Estimate the cost savings that we have achieved through the SWMP process.

1.2 Who should write and implement a SWMP?

The Client is responsible for ensuring that the plan is prepared before construction work begins. Therefore, at this stage of the project the first draft of the SWMP will be produced by the Health and Safety Department as part of the pre-start meeting prior to handover to the Construction Department

As principle contractor we must update the SWMP as work progresses and ensure that workers on the site are aware of the plan and co-operate with it. Therefore, at this stage of the project the SWMP will be managed by the Construction Department. This will include providing suitable site induction, information and training. We will in turn need to engage their employees and sub-contractors to ensure that any waste management objectives in the SWMP are understood and achieved.

It is important to remember that responsibility for compliance with the SWMP Regulations rest note solely with an individual by ultimately with the client or principle contractor company i.e. Gleeson Homes and Regeneration. If there is a change of personnel during the course of the project, the details of those responsible for the plan must be kept up-to-date.

Responsibility for carrying out the waste management tasks in the SWMP should fall to the relevant contractors and sub-contractors. Such tasks should be written into the terms of contracts to ensure understanding and accountability at all levels. This is consistent with recent changes in waste legislation that have been removed the defence of acting under the instructions of the employer. It makes good business sense to make payments for waste disposal only when evidence of delivery to an authorised site has been provided. Periodic checks and audits will also help to minimise the risk of fly- tipping.

1.3 What should be recorded in a SWMP?

A SWMP will need to forecast how much of each type of waste will be produced on site and how it will be managed. But before this, decisions may already have been taken on the design, construction method and materials that will reduce the amount of waste. Such decisions should be recorded in the plan before addressing the waste that cannot be avoided. For the residual waste, we should explore the options for reusing or recycling on-site before we consider any off-site possibilities for re-use, recycling or other types of recovery or disposal.

The plan also needs to identify the location of the site and the individuals responsible for preparing and implementing it as per the example in Annex A. A summary of the details required in the first draft of the plan is set out below:

Responsibilities

1. The Client
2. The principal contractor
3. The person who drafted the plan

Description of the Construction Works

4. The location of the construction site
5. The estimated cost of the project

Materials Resource Efficiency

6. Any decision taken before the SWMP was drafted to minimise the quantity of waste produced on site.

This statement should provide information on any consideration given to materials resource efficiency in designing and planning the construction. This may include design specifications, the choice of materials used or method of construction, such as pre-fabrication. Preliminary records of decisions taken on materials resource efficiency may begin at the earliest stages of the project, and copies of related documentation can be used to help complete this section of the SWMP.

Waste Management

7. Describe each waste type expected to be produced during the project.
8. For each waste type estimate the quantity of waste that will be produced (further guidance will be issued regarding this aspect)
9. For each waste type identify the waste management action proposed (including re-use, recycling, other types of recovery and disposal)

As a minimum the description of waste types should be recorded as inert, non-hazardous or hazardous, with further identification of individual waste streams allowing the waste management route to be determined for each.

Waste Controls and Handling

10. A declaration that all waste produced on the site dealt with in accordance with the waste duty of care.

11. A declaration that materials will be handled efficiently and waste managed appropriately.

Both the client and the principle contractor are specified in these declarations which must be written into the plan, confirming that both parties are responsible for ensuring the effective management and handling of materials and waste on site and that any waste disposal is carried out legitimately. This declaration is to be signed by the Construction Director responsible for the site covered by the SWMP. Section 2.1 of this guidance outlines the requirements of the waste duty of care, and by completing the SWMP and following recommendations and advice in this guidance; we will be able to demonstrate that they have taken reasonable steps to ensure compliance.

Appropriate management of waste will include ensuring that other legislative requirements are complied with, in particular, the need to provide 'basic characterisation' of any wastes designed for landfill, proposals to meet the obligation for the pre-treatment of wastes prior to landfilling, securing any necessary waste management licenses or exemptions, and compliance with the hazardous waste controls. Information about agreed practices for the handling and storage of materials should also be included in the plan.

1.4 When should a SWMP be updated?

A SWMP should be updated as often as necessary to give a current picture of how work is progressing against waste estimates contained in the plan. So for waste that is re-used or recycled on site, the SWMP should be updated to describe how much of the estimated volume or tonnage has been processed. For waste that is removed from the site the SWMP must be updated to record the identity of the person removing the waste, the type (and quantity) of waste and the site to which it has been taken.

Therefore, whenever waste is removed from the site the principal contractor (or client, if there is no principal contractor) must record on the plan the identity of the person removing the waste, the waste carrier registration number of the waste carrier and a copy of, or reference to, the written description of the waste. The written description will either be a waste transfer note or for hazardous waste, a hazardous waste consignment note. The site that the waste is being taken to and whether it is a licensed or exempt site must also be recorded. A template is included with example SWMP in

Annex A for recording this information. This information will need to be updated in the SWMP on a weekly basis.

Further detail is then required on the actual waste management actions. The plan must be updated at least every 6 months to record the types and quantities of waste that are:

1. Re-used (and whether on or off site)
2. Recycled (and whether on or off site)
3. Sent for another form of recovery (and whether on or off site)
4. Sent to landfill
5. Otherwise disposed of

Figures on the amount of re-use and recycling, and whether this takes place on or off site, should be provided where possible. Category 3 should then be used to record waste that is sent for any other type of recovery, for example this may include:

- Physical sorting (where this results in recovery of one or more components of the sorted waste)
- Chemical or biological treatment
- Composting
- Incineration with energy recovery
- Remedial treatment of soil

Category 5 should be used for any other type of disposal, including burning without recovery and where it is not possible to record known quantities of mixed waste that are destined for options 1-4.

If significant changes are made during the course of the project, or the plan requires substantial revision, the Regulations allow for a further plan to be produced.

2. A Step by Step summary of opportunities to save

Taking the construction cycle from site clearance to completing a building, the following opportunities exist for improving materials resource efficiency:

2.1 Demolition

Think of demolition waste as a resource which if used efficiently can result in lower disposal costs, savings on new materials substituted by re-used or recovered materials and salvaging architectural features.

Pre-demolition/Pre-refurbishment audit – these will help you to identify what products/materials are present within the existing building and help plan for their recovery routes.

2.2 Pre-Design

We need to recognise the business benefits, as well as environmental benefits, of specifying materials to achieve greater materials resource efficiency. By specifying, for example, recycling content in materials costs can be cut and Corporate Social Responsibility demonstrated.

2.3 Design and Specification

A range of approaches adopted during the design phase can reduce wastage. For example, selecting standard component sizes.

2.4 Tender Specification

Reduce the quantity of waste arising on the construction site by including in tender specifications a requirement for material suppliers to take back any packaging and unused materials. Materials with excessive packaging should be avoided where possible. Thought should be given to the amount of materials needed by decreasing wastage allowances.

2.5 On the construction site

Efficient site planning and material storage will minimise the level of wastage through damage and allow unused materials and waste to be segregated and stand a better chance of effective recovery. Aim to recover any used materials in the highest cost application.

3. Key Waste Materials

Any reduction in material wastage or increase in re-use, recycling or other types of recovery should result in cost savings. Particular attention should be paid to recoverable materials which is re-used could substitute for primary materials. Some key materials have a particularly significant impact on the environment due to high volumes being landfilled or the nature of the material. Some examples of these materials where significant savings can be made below:

Wood is a valuable resource that can be easily be re-used. It can be re-used or recycled depending on its condition and site requirements. Any unused wood should be segregated from other wastes then re-used, recycled or recovered by other means including. Landfill disposal should be considered as the last resort where all other options have been exhausted.

Plasterboard attracts a significant cost premium when landfilled (can be up to £135/tonne) so measures to reduce such waste should secure cost as well as environmental benefits. Plasterboard waste can be reduced by specifying designs to standard board sizes and ensuring protected storage to avoid wastage through damage.

Some options to consider in order to minimise waste

Refurbishment vs new build – expectation is that the former creates less waste, although commercial reasons or planning controls might dictate the choice.

Ordering and delivery of materials – consider how materials are procured and delivered to site. Just in time deliveries can reduce the amount of waste produced as materials spend less time on site.

Standard materials sizes – adapt the design to standard material supply sizes or specify bespoke sizes to avoid waste off-cuts.

Construction methods – prefabrication means less waste on-site and a greater likelihood of the supplier reusing any waste at the site of manufacturer.

4. Summary

In order to maximise materials resource efficiency savings, we need to prioritise waste minimisation right throughout the project, not just when the SWMP process prompts us to do so.

In the SWMP we will need to record for each waste type how much will be re-used, recycled or taken away for recovery or disposal elsewhere. Effective implementation is key to the SWMP process; tie contracts to waste targets and regularly engage with contractors. As waste is processed, update the SWMP and refer to the waste transfer documentation to complete the audit trail. When the project is finished review the SWMP and determine where we have achieved our plans and what could be improved next time.

SWMPs will be regulated, where possible by the contracts manager during his existing site visits. Checks need not be thorough but must ensure that a SWMP is in place and regularly updated, unless more significant compliance issues or fly tipping is suspected. It is important to remember the SWMPs reinforce a chain of responsibility for all waste actions from the sub-contractor to the principal contractor or corporate body.

Finally, although the legal requirement for SWMPs is intended to safeguard construction projects from illegal waste operatives, the wider approach of tackling waste at source is where the greatest environmental – as well as financial – benefits can be secured.