

Waste Audit

Highgrove Group (Reading) Limited on behalf of PRZM Real Estate

and ALDI Stores Ltd

Land at London Road, Devizes

February 2026

1. Introduction

- 1.1 Avison Young have been instructed by Highgrove Group (Reading) Limited on behalf of PRZM Real Estate ("PRZM") and ALDI Stores Ltd ("ALDI"), to produce a waste audit to accompany a planning application for the erection of a new foodstore, drive thru unit and EV charging hub on land at London Road, Devizes, Wiltshire.
- 1.2 The audit outlines the waste management strategy during both the construction and operational phases, ensuring compliance with Wiltshire Council's planning policies and national waste regulations.

2. Planning Policy

- 2.1 Wiltshire Council formally adopted the *Wiltshire and Swindon Waste Core Strategy 2006–2026* in July 2009. This Development Plan Document (DPD) forms a key part of the statutory planning framework for waste management across the Wiltshire and Swindon area.
- 2.2 The DPD outlines a spatial vision, and a set of strategic objectives aimed at delivering a sustainable, integrated, and flexible waste management system. The strategy promotes the waste hierarchy, which prioritises waste prevention, reuse, recycling and recovery before disposal.
- 2.3 PRZM and ALDI's waste management strategy, encompassing both the construction and operational phases of its developments, is closely aligned with the objectives set forth in the Waste Core Strategy. ALDI adopts a consistent, nationwide approach to waste minimisation, segregation, and recycling, which reflects best practice and complies with both local and national policy requirements.
- 2.4 During construction, PRZM and ALDI implements site waste management plans (SWMPs) to reduce landfill dependency and maximise material reuse. Operationally, ALDI integrates sustainable waste practices into store design and daily operations, including provision for customer recycling, efficient

waste storage, and partnerships with waste contractors to ensure high recycling and recovery rates. This approach supports the strategic objectives set out in the Core Strategy.

3. Construction Phase Waste Management

- 3.1 This section outlines the procedures for managing construction, excavation, and demolition waste in line with the waste hierarchy and legal obligations.

Non-Hazardous Waste Management Summary

1. Waste Minimisation

- Apply the waste hierarchy during design and construction to reduce waste generation.

2. Waste Removal (Duty of Care)

- Use only licensed waste carriers and permitted waste management sites. Destination waste management sites should hold a valid and relevant waste management licence / environmental permit.
- Ensure all waste movements are documented with valid Waste Transfer Notes.
- Obtain weekly records of waste carriers, destinations, and quantities from Contractors.

3. On-Site Treatment

- Assess whether materials for reuse and / or treatment are classified as waste.
- Obtain necessary permits or exemptions for on-site processing (e.g. crushing, reuse of timber or aggregates).
- Reuse and/or treatment of material generated on-site or imported to the site may require waste controls.

4. Use of Waste Materials On-Site

- An Environmental Permit or Waste Exemption is required if waste materials are to be used for either temporary or permanent works.
- Reuse of spoil on the site where it has been produced is considered waste and requires the site to have a Waste Exemption or Environmental Permit unless:
 - The reuse is part of the planned design.
 - It requires no treatment.
 - It can be within the site boundary.
- Waste material shall be brought to the site by a registered waste carrier and accompanied by a waste transfer note
- Ensure waste is stored securely to avoid pollution, harm to human health or escape/release

5. Waste Storage

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- Separate hazardous from non-hazardous waste.
 - Waste shall be stored securely to prevent pollution or escape.
 - No waste shall be stored on-site for more than 12 months.

6. Additional Good Practices

- Return packaging to suppliers where possible.
- Segregate waste types to aid reuse / recycling (e.g. timber, metals, plastics, green waste) to aid recycling.
- Audit waste transfer stations for capability, licence restrictions and performance.
- Use waste exchanges (e.g. NISP, Recipro) to find reuse opportunities.
- Plan early to secure necessary environmental permits or waste exemptions.

Hazardous Waste Management

1. Removal from Site

- Any site disposing of more than 500kg of hazardous waste annually should register as a hazardous waste producer with the Environment Agency.
- All wastes removed from the site shall be accompanied by a relevant and correctly completed hazardous waste consignment note. Hazardous waste consignment notes shall be retained for 3 years

2. Reasonable steps are to be taken to ensure:

- Avoid choosing materials that produce hazardous waste

Contaminated land

- Contaminated land is typically picked up during ground surveys and an appropriate remediation plan shall be agreed by specialist contractors in consultation with the relevant Local Authority and Environmental enforcement body for the site and reviewed by DSP Group site management
- If previously unidentified contaminated land is suspected all works are to be suspended.
- Disposal of contaminated soil shall only be undertaken by specialist contractors in consultation with the relevant Local Authority and Environmental enforcement body for the site
- Reasonable steps are to be taken to ensure:
 - Contaminated Land Tool Box Talks shall be delivered to ensure all operatives on site are trained and aware of how to identify contamination.
 - Appropriate personal protective equipment is worn as required by RAMS to prevent exposure to contaminants (e.g., gloves, breathing apparatus, and coveralls)

Demolition

- Waste exemptions or environmental permits to be in place before any relevant works.
- Mobile crushers will require a relevant mobile treatment permit Implement dust and noise controls
- Storage of material is ensured to be controlled to minimise dust and/or silt runoff

Production of Aggregates

- Consideration to be given to the production of aggregates in line with the 'WRAP Quality Protocol for the Production of Aggregates from Inert Waste'. In this case, no further waste documentation is required.

Management of Materials

- Hazardous Materials - Ensure safe storage (e.g., bunded enclosures) and compliance with regulations to prevent environmental contamination.
- Storage Practices - Protect materials from weather and damage to avoid spoilage and unnecessary disposal.
- Material Selection - Choose low-emission, low-waste materials to reduce hazardous by-products.
- Prioritise local sourcing to cut transport emissions and support the local economy.
- Use just-in-time delivery schedules to reduce over-ordering and material degradation.
- Conduct regular stock checks to avoid duplicate orders and use accurate takeoffs to order only what's needed.
- Promote reuse of offcuts and reclamation of surplus materials.
- Set up a **waste management zone** with clearly labelled containers.

Excavation and Filling

On-Site Treatment and Reuse

- Assess whether excavated or imported materials intended for reuse or treatment (e.g., soil screening) are classified as waste under current environmental regulations.
- Where applicable, secure the necessary **waste exemptions** or **environmental permits** for on-site treatment or reuse activities.
- Implement appropriate **storage and handling measures** to prevent environmental impacts such as dust generation or silt-laden runoff.

Export of soil and clays

- Confirm that the **receiving site** is authorised to accept the material by holding a valid **waste exemption** or **environmental permit**.

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- Complete waste transfer documentation as per 'Non-Hazardous Waste Management'.

Import of soil and clays

- Determine the source of material to be imported. If virgin soil or clays are sourced from one of the following, the material is not a waste and no further paperwork is required:
 - Agricultural land (E.g., DEFRA guidance on soil stripping)
 - Quarry or borrow pit (operating under a minerals extraction license)
- If soil or clays are sourced from a development site, determine what permission (waste exemption or environmental permit) is required.

Raw Materials Selection

- All timber and timber products are to be obtained from CPET approved sources (FSC, PEFC, SFI, CSA) and accompanied by chain of custody paperwork.
- Reasonable steps are to be taken to ensure:
 - Locally-sourced materials should be used to reduce the carbon impact of transport and to promote economic sustainability.
 - Materials are sourced from a certified manufacturer (e.g., EU Ecolabel or EU Energy labelling, BES 6001 etc.).
 - Materials are sourced that can be recycled or reused at the end of life
 - Materials are sourced recycled/reused sources- where these meet product specification
 - Use standard component/panel sizes to minimise offcuts
 - Consideration shall be given when selecting materials:
 - Rethink – Do we need this material?
 - Reduce – Can we reduce the amount of material we require?
 - Re-use - Can we obtain this material from a reclaimed source (e.g., NISP)?
 - Recycle- Can we obtain materials that can be recycled in the future

4. Operational Phase Waste Management

- 4.1 This section outlines the procedures and key expectations aimed towards store assistants for the managing of waste throughout the store's operational lifespan.

1. The Wastage Cage

- Any products that are damaged and cannot be resold should be stored on the wastage cage.
- This will be clearly labelled in your store.

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- In order to ensure that all loss is correctly recorded, it is important that all products are stored here.
 - Products should not be thrown directly in the bin or left in other places.

2. Raw Animal Products

- Any raw products should be disposed of in the Animal By-product (ABP) bin.
- Any raw product that is damaged throughout the day should be written off immediately by a manager so that it can be thrown straight into the ABP bin.

3. Damaged Products

- Any damaged products that may cause health and safety problems should also be written off by a manager and then safely disposed of.

4. Too Good to Go

- Food products from all fresh commodity groups on their last day of life can be sold via Too Good To Go.
- A manager will make up 'Magic Bags' to sell via Too Good To Go. These bags should be stored in the warehouse chiller prior to collection.

5. Neighbourly Donations

- Some products that cannot be sold to our customers, can be donated to local charities.
- This includes:
 - Products with broken packaging.
 - All products with a Best Before date/Display Unit Code can be donated after the best before date if the quality is maintained.
- These products should be stored within the wastage cage area in the charity section.
- A manager will process this waste separately ready for donation.

6. Evening Waste

- Every evening, a manager scans all Produce, Flowers, Bakery, and Ambient waste through the tills
- This process keeps our systems up to date so that we can place the best possible orders for our customers

Avison Young

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