



Land at Malmesbury Road, Cricklade

Waste Audit Statement

March 2026

The approach described within this Statement demonstrates that the proposals respond to national and local policy and guidance, including the *Wiltshire and Swindon Waste Core Strategy (2009)*, the *Household Waste Management Strategy* and the *Waste Storage and Collection: Guidance for Developers Supplementary Planning Document (2017)*.

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1 Introduction

1.1 This Statement

- 1.1.1 This *Waste Audit Statement* supports the outline planning application for the proposed development of up to 315 dwellings on Land at Malmesbury Road, Cricklade in Wiltshire. It has been commissioned by Mac Mic Strategic Land Limited (the Applicant) to present the proposed approach to sustainable waste management during both the construction and operational phases of the development.
- 1.1.2 The approach described responds to national and local policy and guidance, including the *Wiltshire and Swindon Waste Core Strategy (2009)*, the *Household Waste Management Strategy* and the *Waste Storage and Collection: Guidance for Developers Supplementary Planning Document (2017)*.
- 1.1.3 The recommendations made are described in as much detail as is possible at this outline planning stage. Where specifics are not currently available, the broad approach has been set out to ensure that sustainable waste management and waste minimisation are central themes of the development process from the outset.

1.2 The Site

- 1.2.1 The proposed c.20.72ha site consists of two parcels of land which are located to the north and south of Stones Lane which is to the west of the town of Cricklade.
- 1.2.2 The c.17.22ha Southern Parcel currently comprises pastoral land which is bordered and divided by a series of hedgerows and tree belts. It is proposed that this area will accommodate the built development in terms of housing, infrastructure, SUDS drainage ponds and open space. The parcel is bound by Malmesbury Road to the south, Stones Lane to the northeast, the proposed Bloor Homes development to the east and agricultural land to the north and west.
- 1.2.3 The c.3.50ha Northern Parcel also comprises pastoral land with boundary trees and hedgerows. It is proposed that this will be used to provide the required Suitable Alternative Natural Green Space (SANG) for the development. The parcel is bound by the National Cycle Network Route 45 and agricultural land to the northeast, agricultural land to the south and north west and Stones Lane to the west.

1.3 Description of Development

- 1.3.1 The outline planning application has the following description of development:

Outline planning permission for up to 315 dwellings with associated access and infrastructure including Suitable Alternative Natural Greenspace. All matters are reserved except for access.

- 1.3.2 The image below shows the Framework Plan for the proposed development:



Figure 1: Framework Plan (Roberts Limbrick)

2 Sustainability Policy Review

2.1 National Planning Policy and Regulations

- 2.1.1 The Waste (England and Wales) Regulations 2011 are the primary legal framework for waste management in England and Wales, implementing the revised EU Waste Framework Directive (2008/98/EC). Their main goal is to protect human health and the environment by reducing waste generation and improving resource efficiency
- 2.1.2 The *Waste Management Plan for England (January 2021)* fulfils the requirements of the Waste Regulations 2011 for a Waste Management Plan to be produced and reviewed every six years. It provides an analysis of the current waste management situation in England and evaluates how the Plan will support implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.
- 2.1.3 The *National Planning Policy for Waste (2014)* states that local planning authorities should ensure that all new development proposals make sufficient provision for operational waste management, promoting good design and layout to secure the integration of waste management facilities. The document also requires that waste arising from the construction process is reused and recovered as far as possible to minimise offsite disposal.
- 2.1.4 *Building Regulations 2010 Approved Document H (2015 Edition)* provides guidance in relation to solid waste storage and disposal at new residential development. This includes a requirement that sufficient space is provided for the storage of containers for separated waste, and that these storage areas should be sited so that the distance householders are required to carry/drag refuse does not exceed 30m. There are specific regulations relating to the size, design and siting of the storage areas under different scenarios: the Approved Document should be referred to for full details.
- 2.1.5 *The Environment Act 2021* establishes a new legal framework to replace former EU oversight and drive long-term environmental recovery. It introduced new powers and amended existing legislation to address waste management, including the standardisation of waste and recycling across local authorities, stipulating specific materials that must be collected individually from households and businesses, and introducing mandatory digital waste tracking.
- 2.1.6 The *Separation of Waste (England) Regulations 2025* came into force in March 2025. They require construction business to separate key waste streams such as plastics, metals, paper, and organic waste prior to disposal.

2.2 Local Planning Policy

Wiltshire Core Strategy (Adopted January 2015)

- 2.2.1 The Wiltshire Core Strategy (Adopted January 2015) sets out the Council's spatial vision, key objectives and overall principles for development in the county. It forms the main basis for assessment in planning terms and this Statement has therefore been designed to address its requirements.
- 2.2.2 Policy extracts from the Core Strategy which are of most relevance to this document are provided within the following table:

Core Policy	Extract
57	Ensuring High Quality Design and Place Shaping A high standard of design is required in all new developments (...) Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through: (...) vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter) (...)

Draft Wiltshire Local Plan 2020-2038 (September 2023)

- 2.2.3 Wiltshire Council are currently preparing a new Local Plan to replace the Core Strategy described above. It will cover the period 2020-2038 and will contain a suite of new policies to guide development in the area.
- 2.2.4 The Regulation 19 Pre-Submission Draft Local Plan was submitted to the Planning Inspectorate for Examination on 28 November 2024 but the Examination is currently on hold. The draft Local Plan carries limited weight at this stage.
- 2.2.5 The Draft Local Plan document includes *Draft Policy 87: Embodied Carbon* as follows

Draft Policy	Extract
87	Embodied Carbon Proposals for major residential and/or non-residential development will need to be supported by an Embodied Carbon Assessment that demonstrates a score of less than 900kg/sqm of carbon can be achieved within the development of the substructure, superstructure, and finishes.

- 2.2.6 Embodied carbon refers to the 'upfront' emissions associated with building construction, including the extraction and processing of materials, and the energy and water consumption in the production, assembly, and construction of the building. It also includes the 'in-use' stage (e.g. maintenance, replacement), and the 'end of life' stage (demolition, disassembly, and disposal) plus any transportation.
- 2.2.7 As this is an outline application, it is not possible to complete an Embodied Carbon Assessment as there are no building or infrastructure designs which can be assessed. Instead, this document sets out the overarching principles which will apply at later stages of the planning and development process to ensure that the issue of embodied carbon is considered, and that waste arising from the development (both during its construction and operation) is appropriately managed.

Wiltshire and Swindon Waste Core Strategy 2006-2026 (Adopted 2009)

- 2.2.8 The *Wiltshire and Swindon Waste Core Strategy* sets out the strategic policy framework for waste management and forms one element of the Wiltshire and Swindon Minerals and Waste Development Framework. It includes a set of policies designed to meet identified issues for waste management in the area, relevant extracts of which are included below:

Policy	Extract
WCS5	The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management In the interest of sustainable waste management, the Councils will seek to drive waste up the hierarchy by ensuring that developers demonstrate that the most sustainable option for waste management in Wiltshire and Swindon has been promoted.
WCS6	Waste Reduction and Auditing Proposals for developments (...) will be required to design and provide facilities for occupiers of the development to recycle / compost waste (bring systems) and / or facilities within individual or groups of properties or premises for the source separation and storage of different types of waste for recycling and / or composting. (...) Such provision will be expected to have regard to the existing capacity of facilities already available and to the existing Recycling Plan or Municipal Waste Management Strategy relevant to the area. (...)

Household Waste Management Strategy 2017-2027

- 2.2.9 Wiltshire's Household Waste Management Strategy outlines the council's vision of working towards zero avoidable household waste in Wiltshire.
- 2.2.10 To achieve this vision, the council has identified a number of priorities based on the requirements of the Waste Hierarchy, stating that disposal to landfill should be the last resort.

Waste Storage and Collection: Guidance for Developers Supplementary Planning Document (January 2017)

- 2.2.11 The Waste Storage and Collection Supplementary Planning Document (SPD) supports Wiltshire Council's Waste Management Strategy, providing guidance to developers on waste management in new developments to enable them to produce successful waste management strategies at an early stage.
- 2.2.12 It details how sufficient space for waste management should be integrated into the designs of all developments, and sets out Wiltshire Council's waste collection vehicular access requirements, thereby enabling services to be delivered safely, efficiently and in compliance with regulations.

Wiltshire Design Guide Supplementary Planning Document (Adopted March 2024)

- 2.2.13 The Wiltshire Design Guide SPD provides guidance to developers to ensure a high standard of design for all development in Wiltshire.
- 2.2.14 It includes a chapter on Resources which sets out the council's expectations around waste and recycling.

Cricklade Neighbourhood Plan 2026 (Made March 2018)

- 2.2.15 The current Cricklade Neighbourhood Plan establishes a vision for the development of the area, setting out clear objectives to influence the area's growth. The Plan has been reviewed, and it does not include any policies of specific relevance to this Statement.
- 2.2.16 Cricklade Town Council is in the process of reviewing the Cricklade Neighbourhood Plan with a view to extending it to 2038.

3 Sustainable Waste Management

3.1 The Waste Hierarchy

- 3.1.1 Waste generation, storage, treatment and disposal before, during and after construction will be managed in accordance with the Waste Hierarchy.
- 3.1.2 This is in line with the priorities of the Wiltshire Household Waste Management Strategy and Policy WCS5 of the Waste Core Strategy which requires developers to demonstrate that the most sustainable option for waste management has been promoted.

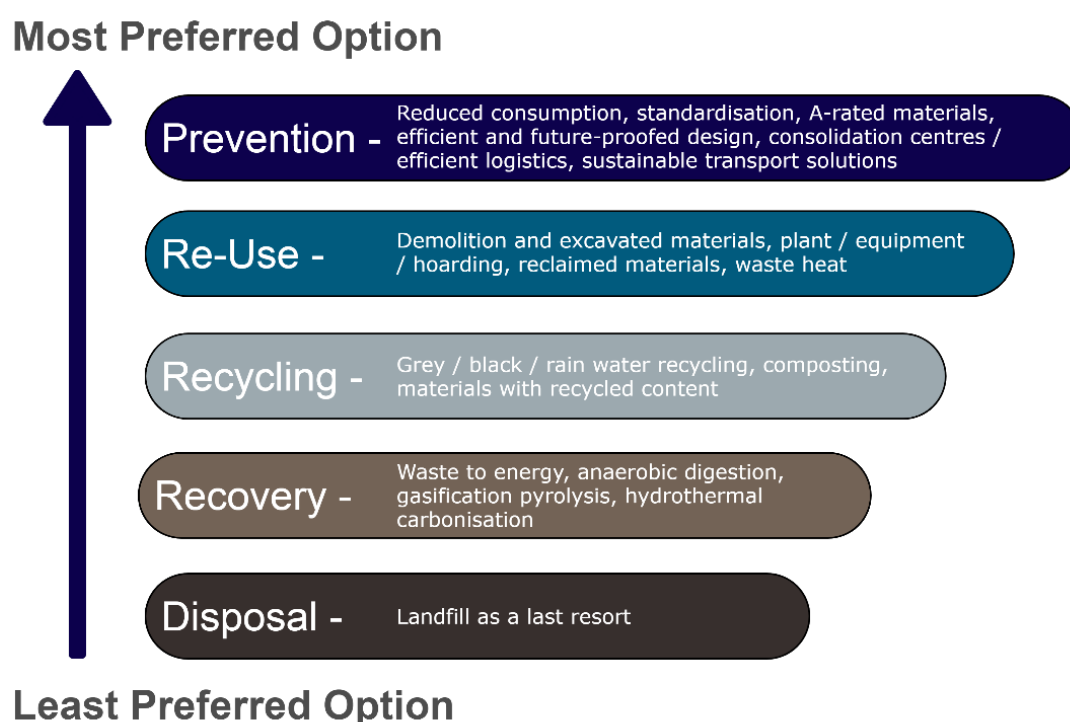


Figure 2: The Waste Hierarchy

3.2 Construction Design

- 3.2.1 The dwellings will be designed with a palette of materials that is both appropriate and in keeping with the local architectural vernacular. As such, the form of construction will not require the use of unusual materials, those with significant environmental impact or those that require significant off-site processing and development before use on site.
- 3.2.2 Whilst modern in terms of architectural design, the introduction of bespoke components and materials that have a greater potential impact will be avoided where possible.

3.3 Sustainable Building Materials

- 3.3.1 Procurement throughout the development process will be outcome-focused with well-defined deliverables covering environmental, social and economic issues.
- 3.3.2 These will include resource efficiency and carbon reduction, and will provide opportunities for the local supply chain:
- Selection criteria will be adopted which incorporates consideration for sustainability, and wherever possible allows for the most sustainable solutions to be procured;
 - Key materials will be sourced using suppliers with recognised environmentally focused accreditations and management systems such as ISO:14001;
 - Materials derived from recycled, repurposed or reused products will be specified where possible;
 - 100% of timber will be sustainably sourced with full FSC or PEFC chain of custody. This certification will ensure that all timber and timber-based products used on the project will be legally harvested and traded products;
 - Preference will be given to materials with low embodied carbon, as stated on the Environmental Product Declaration provided by the material supplier;
 - Single use plastics will be identified and replaced with alternative sustainable solutions wherever possible;
 - Low volatile organic compound (VOC) products will be specified internally where feasible to ensure a healthy indoor environment for residents;
 - Local suppliers of materials will be used where viable to reduce transportation.

3.4 Construction Waste

Type and Quantity of Construction Waste

- 3.4.1 In the UK, residential construction produces a significant amount of waste, with estimates varying based on the measurement metric used (weight vs volume). The construction industry as a whole is the largest generator of waste in the country, accounting for approximately 62% of all UK waste (Department for Environment, Food and Rural Affairs (DEFRA)).
- 3.4.2 According to a dataset from the Building Research Establishment (BRE) and DEFRA from 2009, the average amount of waste produced in the construction of residential developments was estimated to be 15.2m³ per 100m² of floor area. This can be broken down into the following waste product types:

Product	m ³ /100m ²
Canteen/office/ad-hoc	1.73
Ceramics/bricks	1.44
Concrete	1.9
Electrical equipment	0.15
Furniture	0.08
Hazardous	0.06
Inert	0.67
Insulation	1.09
Liquids and oils	0.05
Metals	0.59
Packaging	2.71
Plaster/cement	1.87
Plastics	1.05
Timber	1.89
Grand Total	15.2

Table 1: Construction Waste by Waste Product Type (DEFRA 2009)

- 3.4.3 It is not possible to accurately predict the quantity of waste arising from this particular development at this stage in the planning process.
- 3.4.4 Later in the planning process once housetypes and an accommodation schedule are fixed, the quantity and types of waste arising can be estimated for each stage - groundwork, construction, final fit out – to enable an effective waste management plan to be developed.

Construction Waste Management

- 3.4.5 The Applicant recognises the importance of construction waste minimisation and will work to ensure waste is managed sustainably throughout the development process.
- 3.4.6 The combined impact of the measures outlined below will be a reduction in construction waste arising from the proposed site, in accordance with local policy and guidance.

Preparation and Design Stage

- 3.4.7 During the design stage, the Final Developer will forecast waste streams, estimating the volume and type of waste expected at each stage to enable appropriate planning for its management, storage and re-use/disposal.
- 3.4.8 Opportunities for the on-site reuse of materials arising from site clearance and preparations will be actively identified. For example, the detailed design of gardens and other outdoor spaces will take account of retained soils to ensure they can be incorporated into the site.
- 3.4.9 The design of the site will also incorporate the use of reclaimed and recycled materials procured off site where possible, for example in the sub-base for roads.
- 3.4.10 The Final Developer will put systems in place to optimise materials ordering on a 'just in time' basis, and will create a schedule of materials via Building Information Modelling (BIM) or similar software to prevent the risk of over-ordering and therefore waste.

On-Site Operations

- 3.4.11 Prior to construction, the Applicant will produce a detailed Waste Management Plan (WMP) which will require all contractors to implement strict waste management processes on site which align with the Waste Hierarchy, including:
- Identifying a key individual responsible for delivering the overall WMP for the development;
 - Identifying a designated Waste Zone at the construction site for safe storage and segregation of waste materials;
 - Encouraging strict management of waste by site operatives through site induction and ongoing training / site talks;
 - Appropriate storage of materials to avoid weathering or accidental damage and ultimate wastage;
 - Retaining all excavated materials on site and, during the process of movement of that material, following best practice guidelines for storage to minimise losses to weather and/or erosion;
 - Identifying suitable and well signposted locations for the separation and storage of waste prior to removal from site to encourage higher levels of recycling;
 - Any hazardous waste arising will be managed in accordance with regulations;

- Monitoring and reporting waste disposal, reuse and recycling;
- Identifying additional measures to reduce waste and increase reuse and recycling during the construction process;
- Scaffolding, hoarding and surplus building materials to be removed from site for use on subsequent construction projects.

3.4.12 The WMP will be a live document that will be updated throughout the design and construction process to respond to progress on site.

Compliance and Documentation

3.4.13 Where waste must be removed from the site, only licensed waste management contractors with a proven record of delivering high levels of recycling will be appointed. Furthermore, all appropriate licences/permits from contractors will be collected to confirm contractual requirements.

3.4.14 All waste will be recorded using the appropriate methodology (Waste Transfer Notes for non-hazardous waste and Consignment Notes for hazardous materials, to be replaced by digital waste tracking via the DEFRA Waste Data Service from 2027).

3.4.15 It will be a contractual requirement that any contractor operating on the site commits to the Considerate Constructors Scheme and aims to achieve best practice under assessment. This will help minimise the impact on the surrounding area and neighbours to the site.

Post-Project Review

3.4.16 Within three months of completion, the actual waste volumes will be compared against the initial forecasts to identify where more waste was produced than expected to inform future projects.

3.5 Operational Waste

Type and Quantity of Operational Waste

- 3.5.1 According to the DEFRA Local Authority Collected Waste from Households Annual Results for 2023-24, households in Wiltshire were responsible for disposing of 211,758 tonnes of waste during the year as follows:

Household Waste in Wiltshire 2023-24		Tonnes of Waste
Waste sent for recycling/composting/re-use	Dry recycling/re-use	50,868
	Green recycling/re-use	41,710
Waste not sent for recycling		119,180
Total household waste		211,758

Table 2: Household Waste in Wiltshire 2023-24

- 3.5.2 With around 215,000 households in the district (Census 2021), this equates to 985kg of waste per household, of which 431kg was recycled, composted or reused:

Waste Per Household (Estimate)		kg per household
Waste sent for recycling/composting/re-use	Dry recycling/re-use	237
	Green recycling/re-use	194
Waste not sent for recycling		554
Total waste per household		985

Table 3: Waste per Household in Wiltshire District 2023-24 (Estimate)

- 3.5.3 These figures have been used to calculate an estimate of the operational waste arising from the proposed development annually across the 315 dwellings. As shown in Table 4 below, it is estimated that 97 tonnes of waste will arise from the development annually, with over 42 tonnes of that waste being sent for recycling/composting/reuse:

Waste Per Household (Estimate)		kg per household	Site wide estimate (kg)	Site wide estimate (tonnes)
Waste sent for recycling/composting/re-use	Dry recycling/re-use	237	23186	23
	Green recycling/re-use	194	19012	19
Waste not sent for recycling		554	54324	54
Total waste per household		985	96522	97

Table 4: Estimate of Operational Waste Arising per Year

Operational Waste Management

- 3.5.4 Property occupants will be encouraged to manage waste sustainably in line with Policy WCS6 of the Waste Core Strategy and the Waste Storage and Collection SPD, and this will be considered in full at the Reserved Matters stage.

Waste Storage Areas

- 3.5.5 Sufficient provision on level hardstanding within the curtilage of each dwelling will be made for the convenient and discreet storage of the required receptacles. In the case of flats/apartments, secure communal provision will be made.
- 3.5.6 All waste storage areas will be positioned in accordance with Building Regulations 2010 Approved Document H and the Waste Storage and Collection SPD, and will be designed in line with the collection regime of the council which is currently understood to be:
- General, non-recyclable waste (180l grey lidded wheelie bin) collected fortnightly
 - Mixed dry recycling (240l blue lidded wheelie bin) collected fortnightly
 - Glass recycling (55l black box/basket) collected fortnightly
 - Garden waste (180l green lidded wheelie bin) collected fortnight (paid for service).
- 3.5.7 However, it is noted that Wiltshire Council is preparing to launch changes to its recycling services in 2027 to improve recycling rates and meet legal requirements under the Environment Act 2021.
- 3.5.8 For example, a food waste collection will commence from August 2027, and a revised recycling collection regime to include soft plastic/bags is currently being tested.

Waste Collection Points

- 3.5.9 Waste collection points will be designed in accordance with Building Regulations 2010 Approved Document H and the Waste Storage and Collection SPD, which include the following considerations:
- The waste collection points should be positioned where the boundary of a property meets the public highway;
 - They need to be clearly visible from the road;
 - The collection points must be on hard standings and gradients must not exceed 1:12;
 - The containers left out for collection must not block the footway or present hazards to users;
 - Collection points should be free from obstacles such as bollards, hedges, etc.

- 3.5.10 Final arrangements for waste storage and waste collection at this development, and the routes between the two, will be discussed with the council at the Reserved Matters stage to ensure future waste collection services are taken into account. At that point, a plan of the proposed waste storage and collection area layout will be provided as required by the Waste Collection and Storage SPD.

Vehicle Access

- 3.5.11 A preliminary Swept Path Analysis has been undertaken as part of the Transport Assessment to ensure that the outline plans for the development provide adequate space for kerbside waste collection vehicles and their operatives.
- 3.5.12 Refuse collection vehicle access will be considered in full at the Reserved Matters stage as part of the detailed design of the development.

Resident Welcome Packs

- 3.5.13 It is proposed that welcome packs for new residents will include information on local waste collection services and advice on waste reduction, reuse and recycling to encourage positive consumer behaviour.

4 Summary

- 4.1.1 This *Waste Audit Statement* has been commissioned by Mac Mic Strategic Land Limited (the Applicant) to describe how waste minimisation and management will be addressed at the proposed development on Land at Malmesbury Road, Cricklade in Wiltshire.
- 4.1.2 In particular, the Statement provides as much detail as is possible at this stage in the planning process to demonstrate the principles that have been established for waste management during the construction and the operational phases of the development, in line with national and local policy and guidance, including the *Wiltshire and Swindon Waste Core Strategy (2009)*, the *Household Waste Management Strategy* and the *Waste Storage and Collection: Guidance for Developers Supplementary Planning Document (2017)*:
- Waste generation, storage, treatment and disposal before, during and after construction will be managed in accordance with the Waste Hierarchy;
 - The form of construction will not require the use of unusual materials, those with significant environmental impact or those that require significant off-site processing and development before use on site;
 - Procurement throughout the development process will be outcome-focused with well-defined deliverables covering environmental, social and economic issues;
 - Embodied carbon will be reduced by applying sustainable design principles, including informed material selection and the use of re-used and recycled materials during construction;
 - Construction waste will be reduced through a combination of measures including re-use and recycling of materials, efficient and accurate ordering of materials and effective waste management on site,
 - Operational waste storage areas and collection points will be provided in accordance with Building Regulations 2010 Approved Document H and the Waste Storage and Collection SPD;
 - Residents will be encouraged to reduce, reuse and recycle through considered design and guidance.
- 4.1.3 As the planning and development process progresses, and as the wider regulatory environment develops, the approach proposed will be kept under review. The final design solution and associated detail will be provided at the Reserved Matters stage.
- 4.1.4 Overall, and in conclusion, the proposals for the development seek to minimise waste production and prioritise the efficient use of resources in accordance with the Waste Hierarchy, contributing to a sustainable and environmentally sound development.

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