GLEESON LAND
LAND EAST OF BLACKMORE FARM, MELKSHAM

OUTLINE WASTE MANAGEMENT STRATEGY PLAN

FEBRUARY 2026

the journey is the reward

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OUTLINE WASTE MANAGEMENT STRATEGY

FEBRUARY 2026

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Prepared by:	**LB**
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Mayer Brown Limited, Lion House, Oriental Road, Woking, Surrey GU22 8AR
Telephone 01483 750508 wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

Gleeson Land

Land East of Blackmore Farm, Melksham

Outline Waste Management Strategy Plan

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1 Introduction

1.1 This Outline Waste Management Strategy (OWMS) has been prepared by Mayer Brown Ltd to support the development of Land East of Blackmore Farm, Melksham. The application is submitted on behalf of Gleeson Land.

1.2 The site is situated to the east of Melksham in Wiltshire on land which is currently in agricultural use. The site itself lies to the south of the A3102 Sandridge Common and east of Eastern Way. The general surroundings of the site are agricultural, except for the residential areas off Snarlton Lane to the west and the Sandridge solar farm to the east. The site is located within the administrative area of Wiltshire Council.

1.3 The site in relation to the highway network can be seen in **Figure 1.1** below.

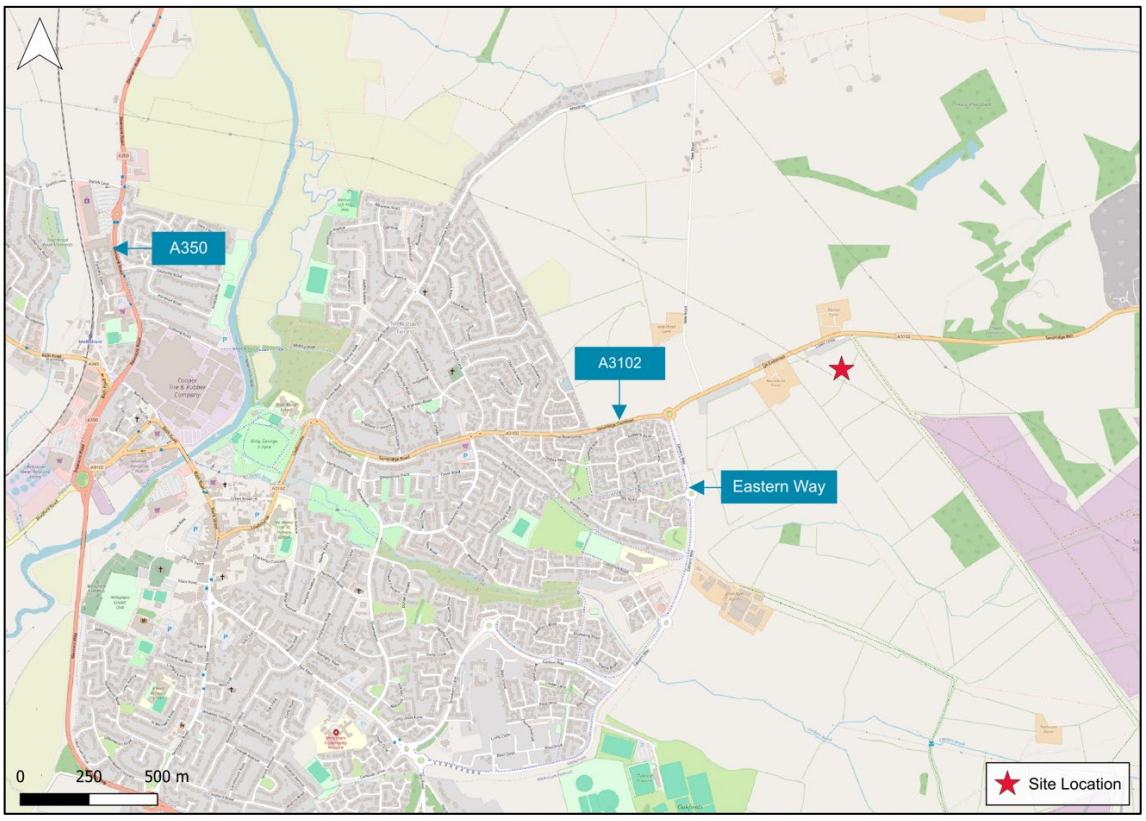

Figure 1.1: Site Location in Local Context

1.4 The development proposals are for the construction of up to 275 residential dwellings, with associated parking and landscaping. The site parameter plan is provided at **Figure 1.2**.

Figure 1.2: Parameter Plan

1.5 Phase 2 sits adjacent to Phase 1 (Ref: PL/2023/11188), and builds on the principles established at Phase 1. Outline permission (Some Matters Reserved) with Conditions has been approved for Phase 1, involving the development of up to 500 dwellings and up to 5,000sqm of employment including a primary school and mixed-use hub.

1.6 This OWMSP has been produced to establish the outline waste requirements of the site uses and their ongoing waste operations. This document has been compiled with reference to documents which include Wiltshire's Waste Storage and Collection: Guidance for developers Supplementary Planning Document[1], The Definition of Waste Code of Practice[2], the Wiltshire and Swindon Waste Core Strategy, and the Wiltshire Design Guide[3]. Additionally, we are aware of the emerging requirements set out in the

[1]Wiltshire Council (2017) *Waste Storage and Collection: Guidance for Developers, Supplementary Planning Document*. Wiltshire Council. www.wiltshire.gov.uk.
[2] CL:AIRE (2011) *The Definition of Waste: Development Industry Code of Practice*. CL:AIRE. London.
[3] LDA Design (2023) *Wiltshire Design Guide. Shaping the future; My Place, Your Place, Our Place*. Wiltshire Council, www.wiltshire.gov.uk

Wiltshire Local Plan Pre-Submission Draft 2020-2038 and will ensure the strategy acknowledges the waste and storage requirements set out within.

1.7 A number of the elements contained herein will be the responsibility of the contractors at different points in the demolition, construction and operational processes. Therefore, this OWMS has been provided to set out the requirements of the appointed contractors. It will become part of the contract documents provided to any potential contractors and it will form an annex to any contracts with sub-contractors.

2 Legislation, Policy and Guidance

2.1 Defra advises that a material is considered to be waste when the producer or holder discards it, intends to discard it, or is required to discard it. The Waste (England and Wales) (Amendment) Regulations 2011 provides the overarching legislative framework for the collection, transport, recovery and disposal of waste. This document requires the 'waste hierarchy' to be the adopted approach to waste management throughout the UK. This hierarchy will be applied to any waste generated by the proposals and is set out below:

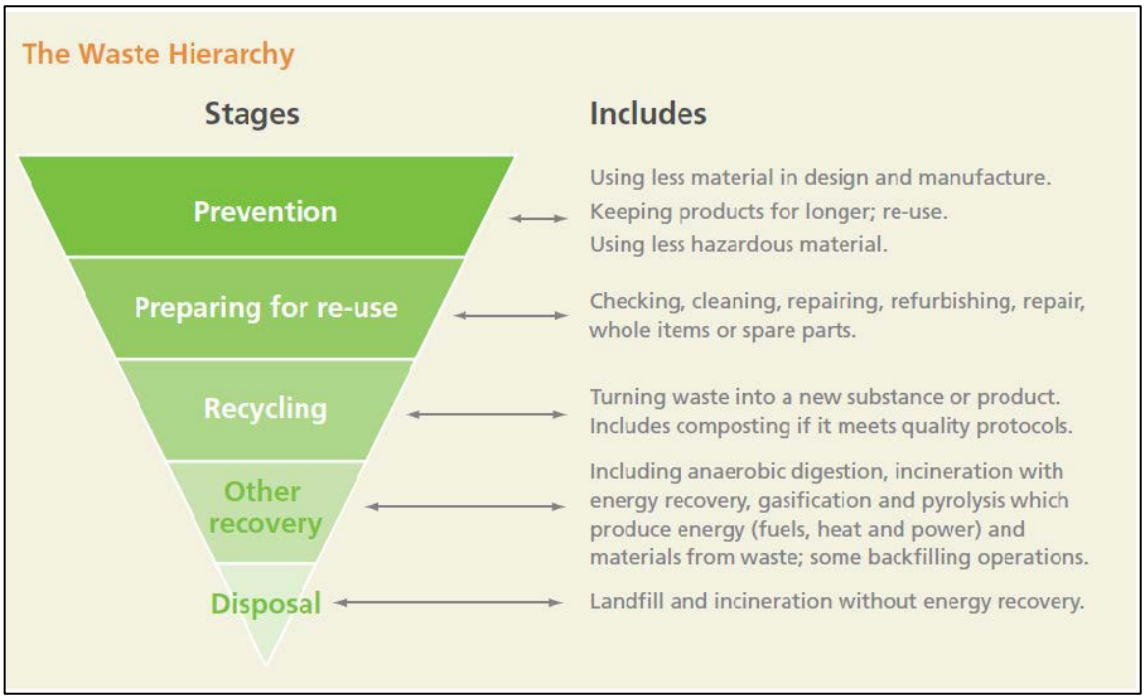

Figure 2.1: The Waste Hierarchy (Source: Government Review of Waste Policy in England 2011)

2.2 This OWMS recognises the current legislation, policy and guidance aimed at reducing waste generated by the process of redevelopment. It is particularly necessary within the Construction and Demolition (C&D) industry, because this is the largest contributing sector to UK total waste generation, accounting for almost two thirds of total waste generation[4] with minerals and soils accounting for 91%.

2.3 The UK target for the recovery of non-hazardous C&D waste is for at least 70% by 2020. 2022 statistics[5] demonstrate this is currently being met at 94.3%. These figures do not account for excavation, where a significant proportion of construction value is lost as

[4] Department for Environment Food and Rural Affairs (2021) *Waste Management Plan for England*. DEFRA. London
[5] Department for Environment Food and Rural Affairs (2025) www.gov.uk/government/statisitcs/uk-waste-data/uk-statistics-on-waste

waste and there is also the implication of increased transportation costs and landfill tax, when potential recycling and reuse of site material is not undertaken.

2.4 All household, industrial and commercial waste is classed as 'controlled waste' and as such is subject to the provision of section 34(1) of The Environmental Protection Act 1990[6] which notes that all waste producers have a 'Duty of Care'[7] to:

- prevent unauthorised or harmful deposit, treatment or disposal of waste;
- prevent a breach by another person to meet the requirement to have an environmental permit, or a breach of a permit condition;
- prevent the escape of waste from your control; and
- ensure that any person you transfer waste to, has the correct authorisation.

2.5 As such, waste producers are required to ensure that those collecting the waste are registered Waste Carriers and that they are transporting the waste to a designated Waste Site or Waste Transfer Station using appropriate Waste Transfer or Consignment Notes. This will be a requirement in all contractor contracts.

Packaging Waste

2.6 Contractors must be aware that there is a duty of care upon them to ensure that where 'Extended producer responsibility for packaging' applies, this is implemented.

2.7 In line with the above, the Environment Act 2021 includes for the aspiration towards a more circular economy, in line with the UK government's ambition of zero avoidable waste by 2050 and a target of eliminating avoidable plastic waste by end of 2042.

National Design Guide[8]

2.8 The National Design Guide refers to the energy hierarchy and notes that well designed places and buildings follow the principles of whole life carbon assessment and the circular economy, reducing embodied carbon. It notes that well-designed proposals for new developments, use materials carefully to reduce their environmental impact.

Wiltshire Core Strategy[9]

2.9 The Core Strategy was adopted in 2015 and covers the period up to 2026. The document provides a positive and flexible overarching planning policy framework for Wiltshire and replaces the South Wiltshire Core Strategy as well as a number of policies from the former district council's local plans.

[6] *The Environmental Protection Act 1990*. (c34). London: The Stationery Office.
[7] Department for Environment Food and Rural Affairs (2018) *Waste Duty of Care Code of Practice*. DEFRA, London.
[8] Ministry of Housing, Communities & Local Government (2021) *National Design Guide. Planning practice guidance for beautiful, enduring and successful places*. MHC&LG), London.
[9] Wiltshire Council (2015) *Wiltshire Local Development Framework: Wiltshire Core Strategy*. Wiltshire Council.

2.10 Waste disposal/management and construction/demolition were considered across a range of policies. The key policies are shown below.

2.11 Core Policy 41 'Sustainable construction and low-carbon energy' states;

"...Sustainable construction

New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes.

Conversions of property to residential use will not be permitted unless BREEAM's Homes "Very Good" standards are achieved.

All non-residential development will be required to achieve the relevant BREEAM "Very Good" standards, rising to the relevant BREEAM "Excellent" standards from 2019…"

2.12 Core Policy 57 'Ensuring high quality design and place shaping' which highlights;

"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…

v. the maximisation of opportunities for sustainable construction techniques …

vii. … 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****)…"*

2.13 Finally, Core Policy 62 'Development impacts on the transport network' states;

"Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages…"

2.14 The minimisation of waste in the construction process is a method to offset adverse transport impacts at that stage.

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Submitted November 2024)

2.15 Wiltshire Council submitted the Wiltshire Local Plan to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. Independent examination has presently been suspended until further information is provided and as such, adoption has been delayed.

2.16 Relevant policies from the emerging local plan have therefore been referenced below.

2.17 Policy 4 relates to addressing climate change and minimising carbon emissions including by:

"v - adopting the principles of the energy hierarchy as well as delivering energy efficient buildings and developments that are fit for purpose and adaptable over time thereby reducing the need for redevelopment and unnecessary waste (in accordance with Policies 85 and 98- Sustainable construction, and Ensuring high quality design and place shaping);

vii - adopting the principles of the circular economy to reduce consumption of finite resources, reduce waste and maximise recycling;"

and maximising carbon storage and sequestration, including by:

"iii. minimising the loss, degradation and erosion of soils and enhancing soil structure wherever possible (in accordance with Policy 91 - Conserving and enhancing Wiltshire's landscapes)."

2.18 Policy 98 relates to ensuring high quality design and place shaping and highlights that this will be achieved through:

"having a regard to… waste storage and collection… effluent, waste or litter);

2.19 All stages of scheme design will consider waste storage and collection, including effluent, waste and litter.

Wiltshire Sustainability Appraisal (Incorporating Strategic Environmental Assessment)[10]

2.20 The Sustainability Appraisal forms part of the evidence base for the emerging Local Plan. This notes that Policy 4 of the Local Plan 'Addressing Climate Change' could be made more sustainable by the inclusion of:

"…*the benefits of incorporating sustainable waste management facilities and integrated recycling infrastructure in new developments as a way of mitigating and adapting to the effects of climate change.*"

2.21 Appendix A of the same document also suggests that, within the Land and Soil Resources topic, the options should be assessed against the criteria to:

"Support the provision of sustainable waste management facilities and include measures to help reduce the amount of waste generated by development through integrated recycling infrastructure."

[10] Wiltshire Council (2023) *Wiltshire Local Plan Sustainability Appraisal* (*incorporating Strategic Environmental Assessment*). Wiltshire Council.

2.22 The provision of sustainable waste management facilities and integrated recycling infrastructure will be incorporated within the proposals and detailed at the reserved matters stage.

Wiltshire and Swindon Waste Core Strategy[11]

2.23 The Waste Core Strategy was adopted in 2009 and covers the period 2006 - 2026. The document sets out the spatial vision, key objectives and overall principles for development covering the provision of sustainable waste management facilities.

2.24 The strategy incorporates a number of policies including:

- WCS5: The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management.
- WCS6: Waste Reduction and Auditing.

2.25 WCS5 sets out the order of preference for waste management which will be applied at Swindon Road and which reflects the 'waste hierarchy' within the Waste Regulations;

- Elimination (Top)
- Reduction
- Re-use
- Recovery
- Safe Disposal

2.26 WCS6 is the key policy with regards to waste management at Swindon Road and this states;

"Proposals for developments that meet the criteria below 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.

- any development providing 10 or more dwelling units;
- any new development of shopping centres or facilities where the total gross floorspace amounts to 500 square metres or more;
- any development of business, industrial, distribution or storage development where the gross floorspace / increase in gross floorspace amounts to 300 square metres or more;

[11]Wiltshire Council (2009) *Wiltshire and Swindon Waste Core Strategy 2006-2026*. Wiltshire Council.

- transport, leisure, recreation, tourist, community, or educational facilities including public car parks and park and ride facilities.

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. Proposals for the developments identified above must also be accompanied by a waste audit, which must include:

a) the type and volume of waste that the development process will generate (the development process comprises the construction process and any other operations necessary to bring the development into being);

b) the steps to be taken to reduce, re-use and recycle any waste that is produced through the development process;

c) the steps to be taken to reduce the production of hazardous wastes in the development process;

d) the steps to be taken to minimise the use of raw materials in the development process;

e) the steps to be taken to reduce the use of hazardous materials in the development process;

f) the steps to be taken to minimise the pollution potential of unavoidable waste;

g) the steps to be taken to dispose of unavoidable waste in an environmentally acceptable manner;

h) the steps to be taken to ensure maximum waste recovery (e.g. recycling and composting) once the development is completed/occupied; and

i) proposals for the transport of waste created during the development process and subsequent use of the site. Development proposals outside of the thresholds above will be required to demonstrate that they have had sufficient regard to minimising waste produced as part of the development process and to the waste hierarchy in identifying a chosen management method for wastes that are produced as part of the development process."

2.27 Whilst much of the above cannot be demonstrated until the reserved matters stage, the principles of WCS6 and the ability to implement its requirements, will be embedded in the scheme design from the outline stage.

Wiltshire Design Guide[12]

2.28 This document highlights the importance, within 'well-designed places' of the appropriate carry/wheel distances for the transportation of waste and the provision of the correct capacity, size and number of containers. It also notes the inclusion of suitable refuse collection points being as integral to the design and in particular the importance of providing homeowners access to their bins '…*without having to walk through their home, or over a neighbour's path or door step'*. This document cross references to the guidance below.

Waste Storage and Collection: Guidance for Developers[13]

2.29 This guidance document provides advice to developers on how to ensure space for waste management within the design of their development and on how to meet the local plan policy requirements.

2.30 The document provides specific guidance for the waste storage and collection for residential developments, commercial developments or mixed-used developments. It also gives advice on vehicle access, planning applications and Section 106 agreements and contributions.

2.31 Adherence to the above legislation, policy and guidance will ensure that this the scheme is fit for purpose and follows the stated requirements of Wiltshire Council.

2.32 Further details will be provided at the detailed application stage, including confirmation that suitable refuse collection points will be provided if necessary.

The Definition of Waste: Development Industry Code of Practice[14]

2.33 In accordance with the Code of Practice, no material will be excavated on site without the prior development of a suitable Materials Management Plan and its declaration and submission to the Environment Agency by an appropriate 'Qualified Person'.

[12] Wiltshire Council (2023) *Wiltshire Design Guide*. LDA Design, www.lda-desing.co.uk
[13] Wiltshire Council (2017) *Waste Storage and Collection: Guidance for Developers, Supplementary Planning Document*. Wiltshire Council.
[14] Contaminated Land: Application in Real Environments (2011) *The Definition of Waste Development Industry Code of Practice*. CL:ARE, London.

3 Design Stage

3.1 The main source of waste minimisation, which applies to the construction phase is in the resource-efficient approach to design and procurement, including the use of sustainable construction technologies. This aids the move to a circular economy by the reduction of waste and minimising the creation and subsequent release of embodied carbon.

3.2 In accordance with Core Policies 41 and 57 the design teams will maximise the use of materials with a low embodied energy within the design process, in order to minimise waste both in the production process and to aid subsequent recycling. Where possible, locally resourced materials will be specified to reduce waste, again due to their lower embodied energy. It is also the case that the design team will embed resource efficiency within the overall scheme design by applying the following measures where possible:

- Reuse and Recovery
- Off Site Construction
- Materials Optimisation - (typically sized and easily obtainable materials)
- Waste efficient recovery
- Deconstruction and Flexibility

3.3 In accordance with the BREEAM Communities Manual, the owner of the site will ensure that the contractor commits to, where possible, recycling building and/or infrastructure materials and using the materials on the development site. In addition, where possible, road construction material will be reclaimed from site or constituted from local recycled material.

3.4 The minimisation of resource use through the scheme design will enable compliance with Core Policy 62 by offsetting:

"…any adverse impacts on the transport network at both the construction and operational stages…"

3.5 Within the design itself, and in accordance with the Wiltshire Sustainability Appraisal and the Wiltshire and Swindon Waste Core Strategy, sustainable waste management facilities and integrated recycling infrastructure will be a feature of the detailed design.

3.6 These facilities will in turn be designed in accordance with the requirements of the Wiltshire Design Guide and the Waste Storage and Collection: Guidance for Developers.

4 Construction

Contractor Requirements

4.1 As noted above, Gleeson Land or subsequent site owner will ensure that the contractor commits to the following measures during the construction process.

4.2 **The site owner is aware that they have a Duty of Care to ensure that:**

a) If their site produces Hazardous Waste they are obliged to obtain a Premises Code from the Environment Agency if more than 500 kg of hazardous waste is produced, held or removed in any 12-month period; and to;

b) Ensure that the appropriate waste licensing and management is obtained.

Recycling

4.3 The contractor will be required to recycle building and/or infrastructure materials and where possible, use the materials on the development site as well as exercising their duty of care to apply the Extended Producer Responsibility for Packaging.

Soils

4.4 All soil testing will be completed prior to excavation to enable a Soil Resources Plan to identify topsoil and subsoil for re-use. A Material Management Plan will then be created in accordance with the Definition of Waste: Development Industry Code of Practice, which will be declared and submitted to the Environment Agency for approval. Soils will then be removed in line with this plan and stored in accordance with the Institute of Environmental Management and Assessment Guide[15]

4.5 Where discarded soil or spoil is to be removed from site, i.e. where the producer 'intends to discard it, or is required to discard it', spoil then becomes 'waste' and appropriate waste transfer procedures will be applied.

Site Waste Management Layout

4.6 An indicative site layout will be provided by the Contractors prior to commencement. This will include the following elements:

- Enough skips to allow for easy segregation of waste. Skips need to be located as close to the area where the specific waste is generated as possible, whilst also being easily accessible for waste carriers to collect or otherwise empty;

[15] Stapleton, C. et al (2022) *A New Perspective on Land and Soil in Environmental Impact Assessment*, IEMA, Lincoln

- All skips will be clearly signed and colour coded;
- Where appropriate, skips will be sealed; and
- All known drainage routes on to and off the site will be marked up.

Waste Record Keeping

4.7 The amount of waste diverted from landfill to recycling facilities will be tracked and reported.

4.8 Accurate records will be kept of waste disposal, including waste transfer notes and disposal certificates.

4.9 Where possible, the site owner will ensure any surplus material is donated to local community projects or charities.

5 Operational Waste Management

5.1 It is envisaged that the proposals will provide 275 new homes, associated parking, open space and landscaping.

5.2 Wiltshire Council's vision for its Household Waste Management Strategy 2017-2027 is working towards zero avoidable household waste in Wiltshire. It is noted that the waste and recycling collected by Wiltshire is derived from choices that residents make at home and thus the scheme design will aid in achieving this vision as far as possible.

Waste Storage and Collection: Guidance for developers

5.3 The Waste Collection Guidance for New Developments (WCGND) Supplementary Planning Document (SPD) sets out information for developers on how waste management should be addressed in proposals for new residential development. It requires that the following 5 elements of waste management are addressed:

- Are all parts of the development accessible to collection vehicles?
- Does each household have a designated collection point?
- Does each household have a suitable route between the designated collection point and the external storage point?
- Does each household have a suitable external storage point?
- Does each household have a suitable internal storage point?

5.4 Each of these are expanded in more detail within the SPD and will be required to be accommodated at the Reserved Matters stage within a Detailed Waste Management Plan in line with the requirements of WCS6.

5.5 The accompanying Transport Assessment identifies that the site access junction has been designed to accommodate an appropriately sized refuse vehicle. The Transport Assessment confirms that the Reserved Matters application(s) will consider refuse collection arrangements in detail to ensure that adequate provision will be made on-site.

5.6 In addition to these basic parameters for households, all premises will be designed to accommodate the storage of the following waste streams:

Domestic Waste Streams

5.7 Currently Wiltshire Council collect the following domestic waste streams which are collected on a fortnightly basis. In most cases eligible households may request large or second bins if required.

Recycling – fortnightly collection

- Blue lidded wheeled bin - Paper, cardboard, plastic bottles, pots, tubs and trays, food cartons, cand and aerosols.
- Black box – glass
- Green lidded wheeled bins (chargeable) – garden waste

Household waste – fortnightly collection

- Grey lidded wheeled bin - Household waste which cannot be recycled.

5.8 It is understood that food waste collections will commence within the Wiltshire local authority area from August 2027. Until this time, residents will be able to purchase a discounted food waste composter and manage their food waste at home.

Validation Checklist

5.9 In order to aid with consultation, Wiltshire Council have developed a Validation Checklist to be completed by the developer at the Reserved Matters stage. This is in order to verify whether a proposed development has suitable access, storage space and collection points. A copy of this checklist, is included in **Appendix A**.

6 Communication

6.1 Once the scheme parameters are available, Wiltshire's Waste Guidance advises that the developer should contact the Waste Management Services Team as early as possible in order to discuss how the design accords with the requirements of the SPD and the 'Validation Checklist' (noted above and within **Appendix A**).

6.2 In addition and early in the construction phase, Wiltshire require that developers contact the Waste Management Services Team to outline when they anticipate that residents will move in.

6.3 Occupiers themselves should be provided with a 'Welcome Pack' which should include:

- Information on the value of reducing, reusing and recycling municipal waste;
- What should be presented in which bins;
- How to dispose of bulky and electrical items etc; and
- Closest Household Waste Recycling facilities.

7 Summary

7.1 The preceding strategy sets out the reasonable steps necessary for Gleeson Land to incorporate at the design stage and for the contractors to apply during the works in order to ensure that waste duty of care is complied with at all stages and that the requirements of the guidance discussed herein are applied.

Design

7.2 It is the intention of Gleeson Land and any subsequent owner of the land that waste will be 'designed out' at each stage of the design process for the development and that sustainable waste management facilities and integrated recycling infrastructure will be integral to the final scheme.

Construction

7.3 With regards to construction, a Detailed Site Waste Management Plan will be developed by the contractors in accordance with WCS6 and using the following principles:

- The SWMP will operate within Construction Management Plan and will establish the waste responsibilities within the management team
- Waste management recycling targets will be set that are specific to the development proposals;
- Procedures will be set for waste classification/determination of material as inert, non-inert and hazardous;
- Dedicated material storage areas and collection arrangements for waste requiring off-site disposal will be provided; and
- Good site management and careful construction scheduling will minimise the generation of unused materials.
- A Materials Management Plan will be completed, declared and submitted to the Environment Agency for approval, prior to commencement.

Operational Waste Management

7.4 The preceding sections set out the assumptions and guidance applied in the provision of the required operational waste management facilities. It also sets out that information which will be required by Wiltshire Council at the Reserved Matters stage within a Detailed Operational Waste Management Plan in line with WCS6.

7.5 In this way, it is anticipated that the development will comply with the strategic and local waste requirements identified and set out within this document.

APPENDIX A: Wiltshire Waste Guidance Validation Checklist

Wiltshire Council Waste Management Validation Checklist

Plans to be provided which demonstrate the following where relevant

All developments
Vehicle tracking to show that access and turning room for a RCV is acceptable, with reversing minimised
Individual residential properties and flats grouped in blocks of five or fewer
Indication of the external waste storage area per property
Identification of the collection point per property
Identification of the route from the storage area to the collection point, including the distance and the width (minimum 1m) of all such routes (may be tabulated separately for ease of reference)
Residential flats which are grouped in blocks of 6 or more
Plan of the container storage area with containers drawn in situ (all to scale), to show that sufficient room has been allowed (including sufficient space to manoeuvre each container individually without the need to move other containers to facilitate such a manoeuvre) and a statement of the distance from the bin store to the kerbside
List of the flats that are allocated to use each bin store
Identification of the collection point (if the container store is not also the collection point)
Identification of the route between the storage area and collection point, and an indication of the distance between these points (only applicable where the container store is not also the collection point) and the width of the route (minimum 2m)
Indication of lighting, drainage and ventilation provisions (where required) on plans for container storage areas and a list/plan to show materials used to construct the storage area, to demonstrate compliance with the Waste Storage and Collection Guidance for Developers SPD.
Commercial developments
Indication of the waste storage area per premises, based on the information supplied in the Waste Storage and Collection Guidance for Developers SPD.
Identification of the collection point per property
Identification of the route between the storage area and the collection point, and an indication of the distance between these points and the width of the route (minimum 1m for 2-wheel containers and 2m for 4-wheel containers)
Mixed-use developments
All of the information required for the sections above on residential and commercial developments; identification of items for residential and commercial developments should be differentiated by colour coding