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Gleeson Land Ltd
Forest Farm, Chippenham
Outline Waste Management
Strategy and Audit

Andrea Hughes BSc MSc CEnv FIEEnvSc
July 2026

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APPENDIX A

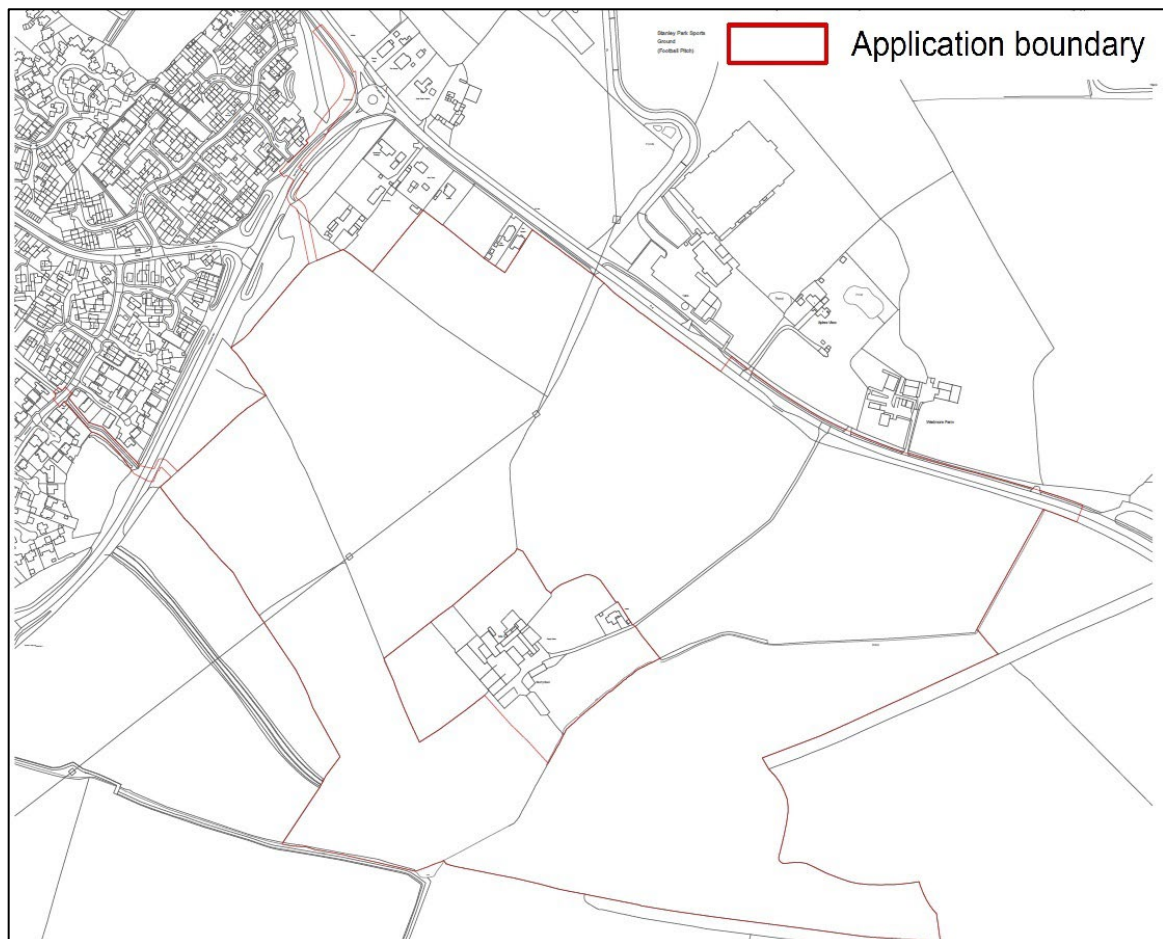
GLEESON PLC WASTE & RESOURCE MANAGEMENT – ENVIRONMENTAL POLICY DOCUMENT

APPENDIX B

WILTSHIRE WASTE GUIDANCE VALIDATION CHECKLIST

1 INTRODUCTION

- 1.1. This Outline Waste Management Strategy & Audit (OWMSA) has been prepared by Celadon Consulting Ltd to support the development of Forest Farm, Chippenham. The Strategy is submitted on behalf of Gleeson Land.
- 1.2. The site is situated to the south-east of Chippenham in Wiltshire on land which is currently in agricultural use. The site itself is 40.14 hectares and lies to the south-west of the A4 London Road and south-east of the A4 Pewsham Way. The site is located within the administrative area of Wiltshire Council.
- 1.3. The proposed development boundary is illustrated within **Figure 1.1** below.



[SOURCE: ADAPTED FROM TOR&CO SITE LOCATION PLAN TOR-PP-001 Rev A]

Figure 1.1 Parameter Plan Site Location

- 1.4. The Forest Farm planning application is submitted with the following description:
“Outline planning application with all matters reserved except access from the A4/London Road for up to 600 dwellings, together with land for a local centre (Use Classes E and F), areas of open space and landscaping, and associated infrastructure.”
- 1.5. This OWMS 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 Practice², the Wiltshire Design Guide³, and Gleeson Land's Waste Management Policy Statement.

¹ Wiltshire Council (2017) *Waste Storage and Collection: Guidance for Developers, Supplementary Planning Document*. Wiltshire Council. www.wiltshire.gov.uk

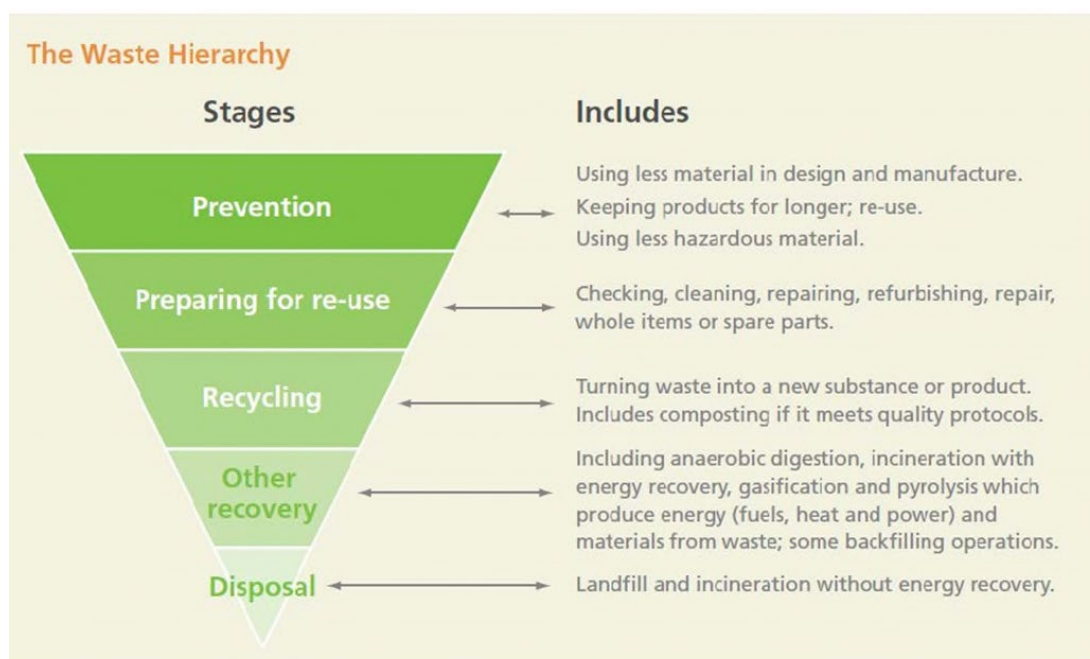
² CL:AIRE (2011) *The Definition of Waste: Development Industry Code of Practice*. CL:AIRE. London.

³ LDA Design (2024) *Wiltshire Design Guide. Shaping the future: My Place, Your Place, Our Place*. Wiltshire Council. www.wiltshire.gov.uk

2 LEGISLATION, POLICY AND GUIDANCE

OVERVIEW

- 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:



[SOURCE: GOVERNMENT REVIEW OF WASTE POLICY IN ENGLAND 2011]

Figure 2.2 The Waste Hierarchy

- 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 generation⁴ with minerals and soils accounting for 91%.
- 2.3. The UK target for the recovery of non-hazardous C&D waste was for at least 70% by 2020. 2022 statistics⁵ demonstrate this is currently being met at 92.6%. These figures do not

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/statistics/uk-waste-data/uk-statistics-on-waste

account for excavation, where a significant proportion of construction value is lost as 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 1990⁶ 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.

2.6. Contractors must also 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 accordance with the UK's 25-year plan and the target to eliminate avoidable plastic waste by the end of 2024.

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.

NATIONAL GUIDANCE

National Planning Policy Framework (NPPF)⁸

2.8. The NPPF seeks to achieve sustainable development via three overarching and interdependent objectives. These are:

- economic;
- social; and
- environmental

2.9. The environmental objective is:

*“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, **minimising waste** and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*

2.10. In addition, the Strategic Policies of the NPPF state that sufficient provision must be made for:

*“...infrastructure for transport, telecommunications, security, **waste management**, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).”*

The National Design Guide⁹

2.11. 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.

The Definition of Waste: Development Industry Code of Practice¹⁰

2.12. 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’.

⁸ Ministry of Housing Communities & Local Government (2024) *National Planning Policy Framework*. MHCLG, London. <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁹ Ministry of Housing, Communities & Local Government (2021) *National Design Guide. Planning practice guidance for beautiful, enduring and successful places*. MHC&LG, London

¹⁰ CL:ARE (2011) *The Definition of Waste: Development Industry Code of Practice*. CL:AIRE, London.

LOCAL

Wiltshire Core Strategy¹¹

- 2.13. The Core Strategy was adopted in 2015 and covers the period up to 2026. The document states its key principles which includes:

*“Working towards lowering Wiltshire’s carbon footprint through the appropriate location of development, and through renewable energy and **sustainable construction**.”*

Strategic Objectives

- 2.14. The Strategy sets out 6 Strategic Objectives (SO) and it is noted that waste is identified in SO 2 ‘addressing climate change’ requiring the key outcome that:

‘New developments will be supported by sustainable waste management.’

- 2.15. In addition, SO 6 ‘to ensure that infrastructure is in place to support communities’ requires the key outcome of:

*“Provision of essential infrastructure, including transport, water, energy, flood alleviation, sustainable urban drainage (SUDs), telecommunications, affordable housing, education, health care, emergency services and **waste and recycling, will have been coordinated and provided in a timely manner within all new development.**”*

Core Policies

- 2.16. Core Policies in relation to Waste disposal/management and construction/demolition are considered across a range of policies. Those with specific relevance to Forest Farm are identified below.

- 2.17. Core Policy 3 ‘Infrastructure Requirements’ identifies the Priority theme 1, that essential infrastructure includes but is not limited to, amongst other things:

“Waste management services such as recycling and collection facilities.”

- 2.18. Core Policy 41 ‘Sustainable construction and low-carbon energy’ requires that:

“...sustainable construction ...will be integral to all new development in Wiltshire”

Noting that:

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

¹¹Wiltshire Council (2015) *Wiltshire Local Development Framework: Wiltshire Core Strategy*. Wiltshire Council

- 2.19. *All non-residential development will be required to achieve the relevant BREEAM “Very Good” standards, rising to the relevant BREEAM “Excellent” standards from 2019...”*
- 2.20. 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**)...”*
- 2.21. 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...”
- 2.22. The minimisation of waste in the construction process is a method to offset adverse transport impacts at that stage.

Wiltshire and Swindon Waste Core Strategy¹²

- 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, primarily within two core strategies:

Waste Core Strategies

- 2.24. WCS5: ‘The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management.’ sets out the order of preference for waste management which will be applied at Forest Farm, and which reflects the ‘waste hierarchy’ within the Waste Regulations.
- Elimination (Top)
 - Reduction
 - Re-use
 - Recovery
 - Safe Disposal

¹² Wiltshire Council (2009) *Wiltshire and Swindon Waste Core Strategy 2006-2026*. Wiltshire Council.

2.25. WCS6: 'Waste Reduction and Auditing' is the key policy with regards to waste management at Forest Farm 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;*
- *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.”

2.26. 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 Guide¹³

2.27. This guidance notes that it is underpinned by the three ‘golden threads’ of:

- health and well-being;
- sustainability; and
- climate resilience

2.28. The document highlights the importance of a number of elements of good design in waste management including:

- providing ample space, suitably located for waste and recycling storage;
- not (generally) locating waste and recycling storage in front of a property;
- applying the appropriate carry/wheel distances for the transportation of waste;
- providing the correct capacity, size and number of containers;
- including suitable refuse collection points as integral to the design;
- ensuring access is free of conflict i.e, bins should not obstruct footpaths or shared driveways;
- providing homeowners access to their bins ‘...without having to walk through their home, or over a neighbour’s path or doorstep’.

2.29. This document cross references to the guidance below

¹³ LDA Design (2024) Wiltshire Design Guide. Shaping the future: My Place, Your Place, Our Place. Wiltshire Council. www.wiltshire.gov.uk

Waste Storage and Collection: Guidance for Developers¹⁴

- 2.30. 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.
- 2.31. 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.
- 2.32. 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.

GLEESON LAND

Waste Management Policy Statement

- 2.33. This document has been produced to demonstrate Gleeson plc's commitment to :
- To ensure that the waste hierarchy is followed
 - To ensure best practice for waste segregation and management
 - To ensure that all waste operations undertaken on site are fully legally compliant and that waste duty of care is followed
 - To ensure that all waste is recorded and reported to Group where required
- 2.34. The policy demonstrates a clear commitment to reducing the amount of waste that is produced across all operations and takes into account the requirement to minimise the resources used in building new homes and the diversion of waste from landfill wherever possible. This policy is provided in full within **Appendix A**.

Energy & Sustainability Statement

- 2.35. The Forest Farm Energy and Sustainability Statement¹⁵ references policy context with regards to Core Policy 41 'Sustainable Construction and Low Carbon Energy' and Waste Core Strategies 5 and 6 (see above) and includes for how the proposals respond to these. With regards to Waste Management, it references the Waste Hierarchy and notes that the applicant will ensure that waste arising from the development (both during its construction and operations) is appropriately managed.

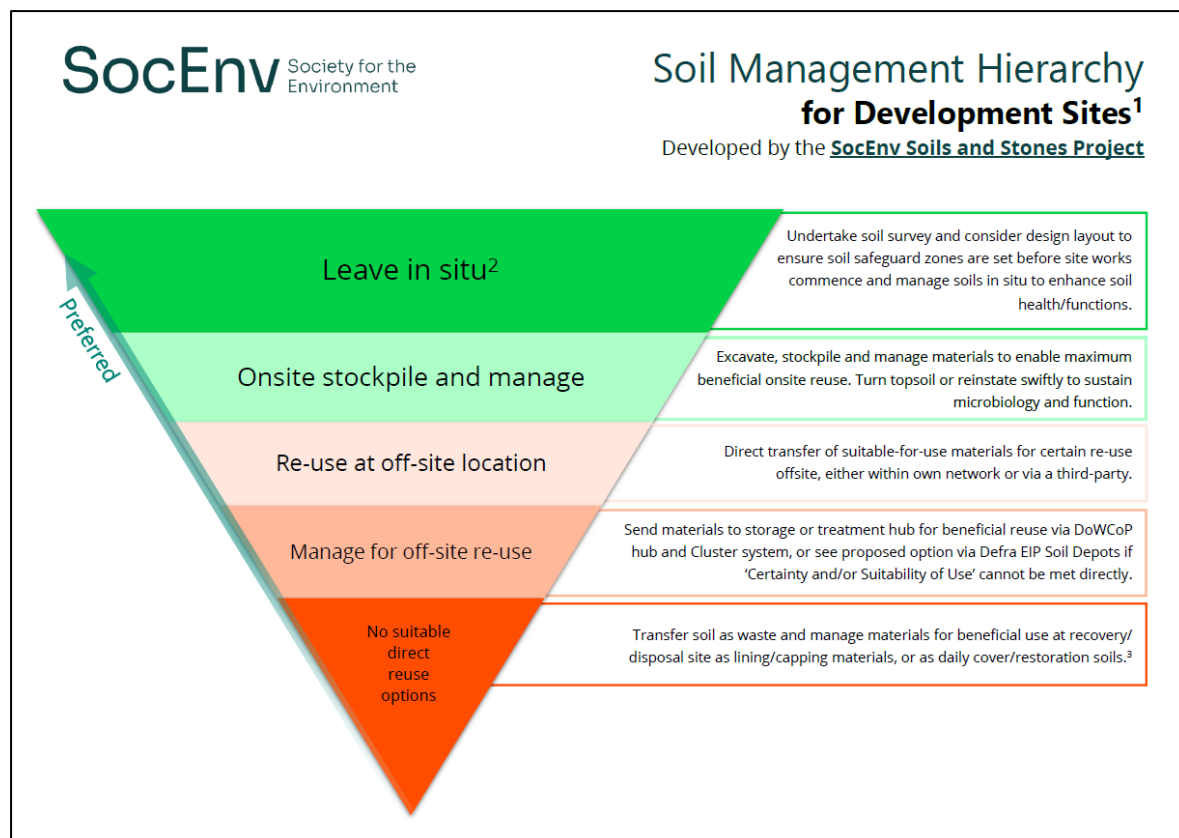
¹⁴ Wiltshire Council (2017) *Waste Storage and Collection: Guidance for Developers, Supplementary Planning Document*. Wiltshire Council

¹⁵ Daedalus Environmental (2026) Forest Farm, Chippenham Energy and Sustainability Statement. Daedalus Environmental, London.

2.36. All of the above National, Local and Developer policy and guidance have been taken into account in the following Outline Waste Management Strategy for Forest Farm, Chippenham.

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 and designing for longevity. 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 the requirements of the NPPF and the National Design Guide, 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 and in accordance with the Energy and Sustainability Statement, local suppliers of materials will be used where viable, both of which measures will reduce the embodied carbon associated with their transportation.
- 3.3. The detailed design will also incorporate the following waste minimisation measures where possible:
- Off Site Construction.
 - Materials Optimisation - (typically sized and easily obtainable materials).
 - Design for Deconstruction
- 3.4. In addition, the Energy and Sustainability Statement notes that suppliers which have recognised environmentally focused accreditations and management systems such as ISO:14001 will be used, and all timber will be sustainably sourced with full FSC or PEFC accreditation.
- 3.5. Soils on site will initially be considered within the design process in relation to the Soil Management Hierarchy provided in **Figure 3.1**. A Soil Resources Plan will be created which will enable designers to consider the site soils with regards to the future site use including the support of landscaping and the provision of Blue-Green Infrastructure and biodiversity enhancements E.g. low nutrient soils may be considered for meadow areas whilst fertile soils may be set aside for gardens.



[SOURCE: See Soils and Stones Project for footnotes]

Figure 3.3 Soil Management Hierarchy for Development Sites

- 3.6. 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.
- 3.7. Where possible the design will incorporate:
- local opportunities for development proposals to specify reclaimed and recycled materials;
 - opportunities to specify materials that are locally produced to reduce transport impacts; and
 - opportunities to specify materials which contribute to regeneration of natural systems;
- 3.8. Within individual properties and in accordance with the Waste Storage and Collection Guidance SPD and the Wiltshire Design Guide appropriate internal and external waste storage will be provided.

- 3.9. 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...”

4 CONSTRUCTION

CONTRACTOR REQUIREMENTS

- 4.1. As noted above, and within the Energy & Sustainability Statement, Gleeson Land will request that the developer or Principal Contractor enrolls with the Considerate Contractors Scheme (CCS) to ensure commitment to the following waste minimisation measures.

Site Waste Management Plan

- 4.2. A detailed SWMP will operate within a Construction Management Plan and will establish the waste responsibilities within the management team. Waste related induction and training will be provided as required.
- 4.3. Waste management recycling targets will be set that are specific to the development proposals.
- 4.4. The contractor will be required to identify all waste streams and recycle all site won 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.
- 4.5. Procedures will be set for waste classification/determination of material as inert, non-inert and hazardous.
- 4.6. Good site management and careful construction scheduling will minimise the generation of unused materials.

Site Waste Management Layout

- 4.7. An indicative site layout will be provided by the Contractors prior to commencement. This will include the following elements:
- 4.8. 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;
- 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.

Soils

- 4.9. As noted, soil management on site will be considered in relation to the Soil Hierarchy in **Figure 3.1**. All soil testing will be completed **prior to** excavation to enable a Soil Resources Plan to identify topsoil and subsoil for re-use and the development of a MMP in accordance with the Definition of Waste: Development Industry Code of Practice. The MMP will be declared and submitted to the Environment Agency for approval. Clean soils will then be removed in line with the MMP and stored in accordance with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites¹⁶
- 4.10. Where discarded soil is to be removed from site to landfill, appropriate waste transfer procedures will be applied.
- 4.11. In accordance with BREEAM (Building Research Establishment Environmental Assessment Method) Gleeson Land 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.

¹⁶ DEFRA (2009) *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*. DEFRA, London.

5 OPERATIONAL WASTE MANAGEMENT

- 5.1. It is envisaged that the proposals will provide up to 600 new dwellings, together with land for a local centre (Use Classes E/ Class F), areas of open space and landscaping and associated infrastructure. Whilst the final housing mix will be agreed with planning officers at the reserved matter stage, it is currently anticipated that 40% of these will be affordable.
- 5.2. The housing mix will accord with Core Policy 45 (Meeting Wiltshire's Housing Needs) and the latest Strategic Housing Market Assessment. The exact details of the size and mix of open market dwellings (and therefore their waste requirements) and the tenure of affordable housing, will be agreed with Wiltshire Council during the determination of the application and, subsequently, at reserved matters stage.
- 5.3. The provision of residential waste management facilities will be applied in accordance with Wiltshire Councils' own guidance.at the Reserved Matters stage.

Waste Storage and Collection: Guidance for Developers

- 5.4. The 'Waste storage and collation: guidance for developers' 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?
- 5.5. 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. 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

- 5.6. 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 – mixed dry recycling.
- Black box – glass
- Green lidded wheeled bins (chargeable) – garden waste

Household waste – fortnightly

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

Commercial Waste Streams

- 5.7. Wiltshire Council also have a commercial waste arm which may be employed to service the Local Centre. However commercial operators may be preferred by the service user.

Validation Checklist

- 5.8. 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 B**.

6 COMMUNICATION

- 6.1. Once the scheme parameters are available, Gleeson Land Ltd will require that the developer contact the Waste Management Services Team as early as possible in order to discuss how the design accords with the requirements of the Guidance Notes and when they anticipate that residents will move in.
- 6.2. Occupiers themselves will be provided with a 'Welcome Pack' which will include elements such as:
- 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 on-site waste management and recycling facilities.

7 SUMMARY

- 7.1. The preceding strategy sets out the reasonable steps necessary to be incorporated at the outline and detailed design stages 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 policy and guidance discussed herein are applied.

Design

- 7.2. It is the intention of Gleeson Land that waste will be 'designed out' at each stage of the design process for Forest Farm 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 using the principles set out within Section 4 and Gleesons own Waste & Resource Management Environmental Policy Document. The contractor will also provide a Site Layout indicating how waste is to be managed on site.
- 7.4. Soil management will be included to ensure that soil resources on site are appropriately identified, protected and stored for later use or disposal as appropriate.

Operational Waste Management

- 7.5. The preceding sections set out the assumptions and guidance applied in the provision of the required operational waste management facilities. They also note the information which will be required by Wiltshire Council at the Reserved Matters stage within a Detailed Operational Waste Management Plan in line with WCS6.
- 7.6. **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

GLEESON PLC WASTE & RESOURCE MANAGEMENT ENVIRONMENTAL POLICY DOCUMENT



Waste & Resource Management

Environmental Policy Document – EnvPD001

Waste and Resource Management

1. Introduction

Generation of waste is one the Groups largest environmental impacts. We generate approximately 10,000 tonnes of waste which costs us more than £1.3m per annum to dispose of. There are two broad groups of waste, hazardous and non-hazardous. Typical waste streams across the group include:

Hazardous	Non-Hazardous
• Packaging containing hazardous substances such as adhesive / sealant tubes, aerosol cans, empty tins of certain paints • Used spill kit material and any other rags or materials used for maintenance • Certain waste electronic equipment (WEEE) such as batteries, computer monitors, fluorescent light tubes	• Dry Mixed Recycling (paper, plastic, card) • Wood - including pallets • Municipal waste (general waste) • Metal • Mixed waste • Plasterboard • Confidential waste

Gleeson has partnered with Biffa to manage waste on sites across the Group, they are supporting the business to maintain our zero waste to landfill and to help develop and deliver waste optimisation targets. The benefit to sites of having Biffa is they will help improve our waste performance, ensure legal compliance, and reduce costs whilst making it easier for all sites to control their waste.

2. Policy Requirements

- To ensure that the waste hierarchy is followed
- To ensure best practice for waste segregation and management
- To ensure that all waste operations undertaken on site are fully legally compliant and that waste duty of care is followed
- To ensure that all waste is recorded and reported to Group where required

All waste managed by Biffa is automatically reported to group, all additional waste needs to be reported

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Doc Owner: Matt Unwin	Issued: May 2026	Pages: Page 1 of 6



Waste & Resource Management

Environmental Policy Document – EnvPD001

3. Site Management Duties

Site Managers should be undertaking a **daily** walk of their site and looking out for any potential environmental issues, it is a site managers responsibility to ensure waste is managed correctly, by:

- Ensure site follows waste duty of care
- Ensure that all site staff and sub-contractors are suitably trained against the waste management policy and understand their responsibilities.
- Ensure that 'personal' household waste is **not** brought onto site by any employees or sub-contractors.
- To proactively encourage correct waste management practice (segregation) and following of the waste hierarchy on site.
- Ensure there are no wasted journeys or contamination of waste on site, and to investigate any that are reported.
- Where sites require an ad hoc / abnormal, or emergency waste service beyond Biffa's scope, ensure an approved waste service provider is used. Follow instruction detailed within **EnvFlow001 Gleeson Waste Process Flow**, and duty of care. If in doubt, contact Group support.
- Ensure that waste is not held on site for any period longer than 12 months.

4. Guidance on Compliance

1.0 Duty of care

Gleeson must deal with the waste it produces in a responsible manner. This is known as our 'duty of care' [Waste duty of care code of practice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-duty-of-care). Waste management has been arranged at Group level, with Biffa now managing the whole groups waste.

For waste duty of care, we must satisfy the following;

- Classify our waste using the 'List of Waste' to ensure that it is stored and transferred / consigned correctly Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste [WM3 guide](#).
- Use the correct SIC (Standard Industry Classification) code for the transferor's industry – We are the transferor, and our Gleeson SIC code is 41202
- Register premises if we produce or store hazardous waste (>500 kg per annum) – **NOTE: This only applies if we acquire and develop on land in Wales**
- Ensure that hazardous waste is removed from site regularly and not storing it for extended periods of time, certainly no more than 12 months.

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Waste & Resource Management

Environmental Policy Document – EnvPD001

- Store waste safely and securely
- Ensure an authorized, licensed waste service provider is used for carrying / storing / processing the waste
- Ensure that the facility where the waste is being transferred to has applicable EA licences or exemptions for the waste being transferred.
- Maintain a register of waste transfer for the required period, non-hazardous waste transfer notes should be retained for 2 years, and hazardous waste consignment notes should be retained for 3 years.
- Hold a valid waste carriers' licence if we carry / transport waste (see Section 2. Requirements for waste permits).

2.0 Waste carrier's licence

All waste removed from site must be undertaken by a licenced waste carrier. Biffa, our waste service providers check and hold records for their sub-contractors. Online licence checks can be undertaken on the EA / DEFRA website [Waste carriers, brokers and dealers \(data.gov.uk\)](https://data.gov.uk)

The PQQ process now requires waste carriers license details to be provided by any contractor responsible for carrying or disposing of waste materials. All waste licenses provided must be checked by Group.

At certain times, Gleeson are required to undertake remedial works on completed developments resulting in carrying waste. We may also transfer waste around developments; therefore, we have registered with the Environment Agency as an upper tier waste carrier. **Our waste carriers' licence is CBDU476190.**

3.0 Requirements for waste permits

Certain waste activities require a licence or an exemption, such as the storage of any waste long term (in excess of 12 months). We do not currently store waste on site for such periods or undertake any activities that require additional licenses or permitting.

At certain times we may crush, size and screen construction materials, such as waste bricks, which is then used as a 'fill' material for subgrade improvement. This is repurposing the waste into a useful by-product. However, this process must be undertaken in accordance with a permit, usually issued by the local authority.

As we outsource this process to a sub-contractor, we must ensure that they hold a valid permit for the work they are undertaking and have notified the Local Authority for where the processing is being undertaken

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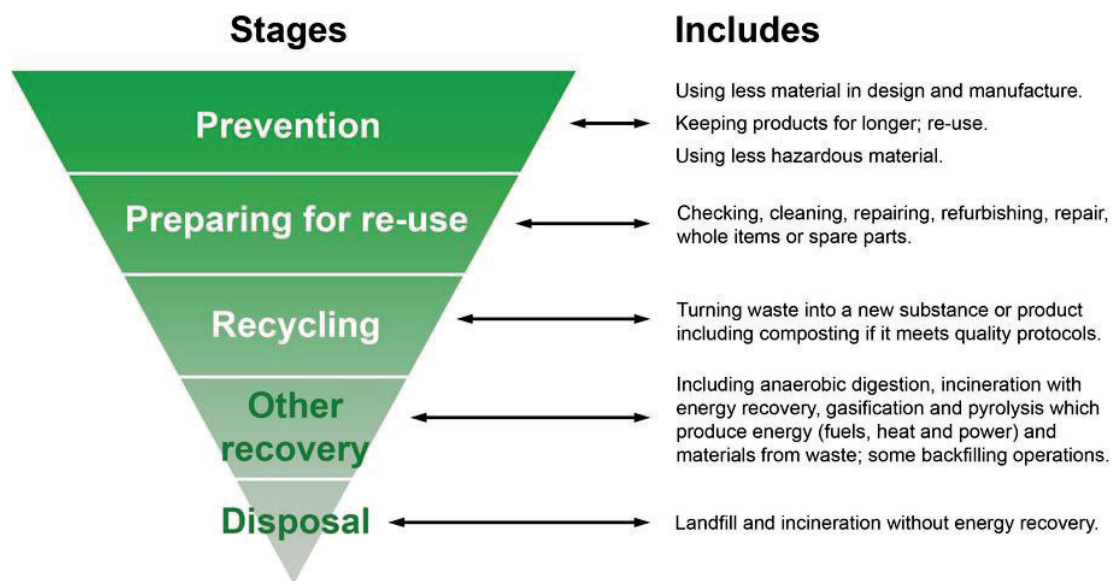
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4.0 Waste hierarchy & Segregation

All employees should follow and promote the waste hierarchy which is adopted by Group;

The Waste Hierarchy



Disposal should be the last resort, where possible and safe to do so waste should be reduced and recycled across all sites. The additional benefit of adopting the waste hierarchy is the cost, sites waste costs will be lower.

Waste storage is available across all sites in various forms e.g. bins, skips, etc. As such, **waste should be segregated and placed in the correct vessels which should be clearly labelled.** Periodic reviews of waste practice will be undertaken throughout the year by Group Sustainability & Environmental, Group Procurement, SHE team and by our waste partner Biffa. This is to ensure that we are undertaking best practice, maximising our recycling and recovery opportunities and meeting our legal compliance obligations

All waste areas must be set up correctly as per the layout specified in the compound pack, TWD 931. All sites must have the contracted skips on site and in use to ensure there is correct segregation. All skips must be clear, easy and safe to access otherwise waste journeys charges may apply, waste journeys will be reported to group and are for the region to manage. All of these instructions also apply to hazardous waste, see compound layout for information on hazardous waste areas. Any queries or problems can be resolved by the Biffa house building team.

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5.0 Rebates

Certain waste streams have a high monetary value and can result in rebates from waste service providers, the most common being scrap metal. We must maximise these waste streams by ensuring that cross-contamination does not occur. With good waste practice and proper segregation Biffa can support Gleeson with a low cost for up lifts; by getting a rebate on our metal they can lower our direct costs. It is imperative that we support this to keep costs low. There are additional legal requirements relating to those collecting and dealing in metal waste. Under no circumstance should scrap metal be allowed to leave site with full documentation in place and retained.

6.0 Waste recording

All waste is recorded and reported to Group through Biffa. Any additional waste streams that are not managed by Biffa must be reported to **Group commercial assistant** monthly. This must include type of waste, volume of waste, and waste carrier details.

Any waste documentation other than that provided by Biffa must be uploaded to the Environmental SharePoint for storage of waste transfer notes, see **EP003 Waste transfer notes** for more information.

7.0 Permits and exempted waste activities

Certain activities involving storage and treatment of waste require permits or exemptions to be registered and maintained. Gleeson does not undertake any activities which require a waste licence, permit or exemption.

8.0 Removal of soil & stone (Muck shift)

All soil should be managed in accordance with site Materials Management Plan (MMP), this includes sampling, storage, and disposal. Any soil that is not detailed in the MMP will be required to be removed from site as a waste, this must be done by a licensed waste carrier and with a Waste Transfer Note (WTN).

Waste Acceptance Criteria (WAC) testing and waste classification testing must have been completed before any movements to identify if the soil is going as hazardous or non-hazardous waste; ensure all soil is tested and appropriately classified. See **Technical Manual** for more details on Muck shift and sampling requirements.

Confirmation that the 'facility' accepting the waste is licenced to do so must be sought. Their permit should clearly state what waste types (EWC) can be accepted. All of these details must then be recorded on the group materials tracker which is managed by each regional technical department.

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For more guidance refer to the Group Technical Manual for additional support and detail on materials management.

9.0 Signage

Ensure all waste skips, bins, drums etc. are labelled correctly as per TWD931. All materials and spoil piles/bunds must be labelled up to identify if its clean or waste ect. For more information on correct signs to use refer to the compound signage pack on the hub.

Related work instructions

- Compound set up pack
- TWD 931
- EnvGN 1.1 Waste flow chart
- EP003 Waste transfer notes
- Technical Manual
- Materials Tracker

For additional support please email she@mjgleeson.com and for any incidents refer to [EP001 Environmental Incident Flowchart](#).

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APPENDIX B

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