

**OUTLINE PLANNING APPLICATION FOR UP TO 25
RESIDENTIAL DWELLINGS AND ASSOCIATED
WORKS. DEMOLITION OF BUILDINGS.**

WASTE MINIMISATION STATEMENT

**LAND OFF KIDNAPPERS LANE, LECKHAMPTON,
CHELTENHAM, GLOUCESTERSHIRE.**

ON BEHALF OF ROBERT HITCHINS LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

- 1.1 This Waste Minimisation Statement has been prepared by Pegasus Group on behalf of Robert Hitchins Ltd and its successors in title to the land. The Statement sets out the approach to waste management that will be applied to the design, construction and occupation (operational phase) of the proposed residential development on Land Off Kidnappers Lane, Leckhampton, Cheltenham.

Site Description and Context

- 1.2 The proposed development site comprises 1.3 hectares of former market garden land to north of Kidnappers Lane, in the Leckhampton area of Cheltenham Borough approximately 2.0km to the south west of the Leckhampton District Centre with the commercial and retail centre of Cheltenham town a short distance further. Although within the administrative area of Cheltenham Borough Council, the boundary of Tewkesbury Borough Council site lies within 400m of the western boundary of the site.
- 1.3 The Application Site comprises a semi-rectangular area of a former plant nursery bounded by established native hedgerows on its western and southern boundaries with an open field boundary to the north abutting agricultural land beyond. The eastern boundary is formed by an adjacent plant nursery complex and contains a number of horticultural structures of varying designs and construction.
- 1.4 The site lies outside of both the Cotswold Area of Outstanding Natural Beauty and the Green Belt and wholly within Flood Zone 1. Also, there are no heritage assets within the site area with the nearest listed building being the Grade II Listed Olde England property approximately 120m to the south of Kidnappers Lane. Therefore, the site is not subject to any statutory designations nor heritage assets.

1.5 **Proposed Development**

- 1.6 An outline planning application is submitted for residential development comprising:

“Residential Development of up to 25 dwellings, associated infrastructure, open space and landscaping, with creation of a new vehicular access from Kidnappers Lane. Demolition of existing buildings.”

Definitions

- 1.7 For the purposes of this report, 'waste' is defined as materials that are unwanted, having been left over after the completion of a process which would otherwise be discarded. Waste minimisation is the process of reducing the quantity of such materials arising, requiring processing and/or disposal.

- 1.8 The priority at the Application Site will not be producing waste in the first place. To do this, the waste implications of the proposals need to be considered at the earliest possible stage.

2. PLANNING POLICY CONTEXT

2.1 The relevant extant and emerging national waste management policy and strategy is set out within the following documents;

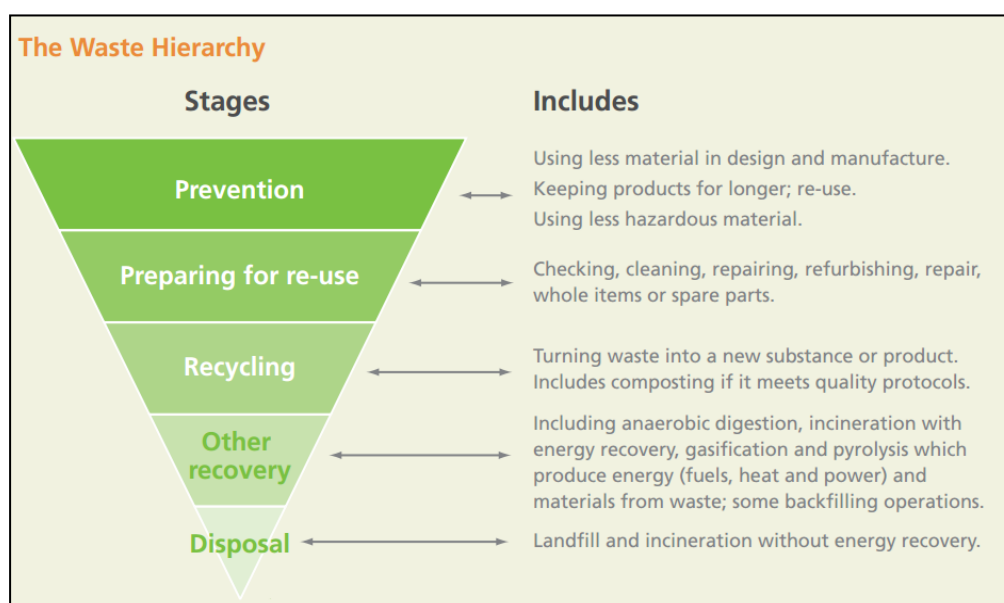
- Waste Management Plan for England, December 2013;
- National Planning Policy for Waste, October 2014;
- National Planning Policy Framework, July 2018.

Waste Management Plan for England (December 2013)

2.2 The Waste Management Plan for England (WMPE) is a high-level strategy that supersedes the former Waste Strategy 2007 and supports the implementation of the objectives and provisions set out within the revised Waste Framework Directive, specifically Article 28 which requires that Member States establish one or more waste management plans covering their territory.

2.3 The WMPE states that the key aim for waste management in England is to work towards a 'zero waste economy'. This means the adoption of the waste hierarchy (see figure 1) as the guiding principle to sustainable waste management.

Figure 1: The Waste Hierarchy



2.4 The Waste Framework Directive (WFD) is the legislative framework for the collection, transport, recovery and disposal of waste. Relevant mandatory requirements of the WFD specify that the Plan should contain information on:

- *"An analysis of the current waste management situation in the geographical entity concerned, as well as the measures to be taken to improve environmentally sound preparing for re-use, recycling, recovery and disposal of waste and an evaluation of how the plan will support the implementation of the objectives and provisions of the revised WFD*
- *Existing waste collection schemes and major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste or waste streams addressed by specific Community legislation;*
- *An assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure in accordance with Article 16 (on the proximity principle), and, if necessary, the investments related thereto;*
- *General waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems".*

2.5 In addition, Schedule 1 of the Waste (England and Wales) Regulations 2011 (the 2011 Regulations) translates the provisions of the WFD into legislation, including:

- *In pursuance of the objectives and measures in Directive 94/62/EC (on packaging and packaging waste), a chapter on the management of packaging and packaging waste, including measures taken pursuant to Articles 4 and 5 of that Directive.*
- *Measures to promote high quality recycling including the setting up of separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors.*
- *As appropriate, measures to encourage the separate collection of bio-waste with a view to the composting and digestion of bio-waste.*
- *As appropriate, measures to be taken to promote the re-use of products and preparing for re-use activities, in particular—*
 - a) *Measures to encourage the establishment and support of re-use and repair networks;*
 - b) *The use of economic instruments;*
 - c) *The use of procurement criteria; and*

d) *The setting of quantitative objectives*

- *Measures to be taken to ensure that by 2020*

e) *At least 50% by weight of waste from households is prepared for re-use or recycled.*

f) *At least 70% by weight of construction and demolition waste is subjected to material recovery.*

2.6 The 2011 Regulations require that everyone involved in waste shall take all reasonable measures to apply the waste hierarchy except where, for specific waste streams, departing from the hierarchy is justified.

2.7 The WMPE advises of the Government's 'Waste Prevention Programme for England' which works towards the zero-waste economy with detailed actions to:

- *encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services,*
- *encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others,*
- *help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth; and*
- *support action by central and local government, businesses and civil society to capitalise on these opportunities.*

National Planning Policy for Waste (October 2014)

2.8 The National Planning Policy for Waste (the NPPW) sets out the detailed waste planning policies. The policy indicated that it should be read in conjunction with the National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste. The NPPW has now replaced the Planning Policy Statement 10 (PPS10) which was previously in force until the 16th October 2014.

2.9 The NPPW sets out the Government's national policies that should be taken into account by waste planning authorities in discharging their responsibilities and ensuring that planning provision of new capacity and spatial distribution of waste

management facilities is based on the best available data. Also, by ensuring there is a collaborative approach amongst planning authorities and the need for waste management facilities is considered amongst other spatial concerns, the NPPW recognises the effective contribution it can bring to the progression of sustainable communities.

2.10 The overall objective of Government Policy on waste, as set out within the NPPW (paragraph 1) is:

“To work towards a more sustainable and efficient approach to resource use and management...”

2.11 Accordingly, the Government seeks for waste to be managed by moving it up the ‘waste hierarchy’ for prevention, preparing for re-use, recycling, other recovery and disposal only as a last resort.

2.12 With respect to determining non-waste planning applications, local planning authorities should ensure that (paragraph 8):

- *“the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*
- *new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape;*
- *the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal.”*

2.13 To deliver sustainable waste management, local planning authorities should monitor and report the take-up in allocated sites; existing stock and any changes in the stock of waste management facilities and their capacity; the amount of waste recycled, recovered or disposed in order to inform the preparation of local plans and the determination of planning applications.

2.14 The NPPW seeks to provide a streamlined approach to sustainable waste management as well as reflect the Government’s aspirations for waste

management and changes due to the implementation of provisions within the Localism Act 2011. Other policy drivers include:

- EU Waste Directive 2008 (2008/98/EC) with regard to collection, transport, recovery and disposal of wastes and measures to ensure that waste is recovered or disposed of without endangering human health or causing harm to the environment. The EU Waste Directive is transposed into English legislation through the Waste (England and Wales) Regulations 2011. The directive has been updated in 2016 and sets out two new recycling and recovery targets to be achieved by 2020.
- Abolition of Regional Planning following implementation of the Localism Act 2011 such that only county or unitary authority waste plans form part of the planning system.
- Energy from Waste reflecting the wide approach promoted through the Government's Waste Review 2011 and 'Energy from Waste – A guide to the debate'.
- Green Belt which relates to the delivery of waste management facilities within designated Green Belt areas.

2.15 The NPPW identifies planning as having a 'pivotal role' in delivering sustainable waste management through:

- Delivery of sustainable development, including climate change benefits by driving waste management up the waste hierarchy;
- Providing a framework in which communities take more responsibility for their own waste, including by enabling waste to be disposed of, or in the case of mixed municipal waste from households, recovered in one of the nearest appropriate installations;
- Helping to secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensuring the design and layout of new development supports sustainable waste management, including the provision of waste storage facilities at residential premises to facilitate a high-quality household collection service.

National Planning Policy Framework (July 2018)

2.16 The National Planning Policy Framework (NPPF) was published on 24th July 2018 and sets out the Government's planning policies for England and how these are

expected to be applied. It further identifies the purpose of the planning system to contribute to the achievement of the sustainable development, what is defined as *"meeting the needs of the present without compromising the ability of future generations to meet their own needs"*.

2.17 The three objectives of sustainable development are as identified:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.18 The NPPF provides a comprehensive overview of national planning policy, combining all previous planning policy guidance and planning policy statements, covering a range of themes. However, the NPPF does not contain specific policies with regards waste, only referring to the Government's planning policy for waste. (National Waste Management Plan published in October 2014).

2.19 Notwithstanding the above, the NPPF (paragraph 204) identifies that in facilitating the sustainable use of minerals, that Local Planning Authorities should *'...so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering the extraction of primary materials, whilst aiming to source minerals supplies indigenously.'*

Local Planning Policy

Gloucestershire Waste Core Strategy (November 2012)

2.20 The Waste Core Strategy for Gloucestershire (WCS) was adopted in November 2012 and it explains how the County Council and its partners will address the issue of planning for waste management in Gloucestershire in the period 2012-2027.

2.21 Table 1 provides an indication of the amount of waste currently generated within Gloucestershire each year, and Table 2 highlights how much of this waste is sent on to landfill:

Table 1: Waste in Gloucestershire¹

Waste Stream	Base Year	Total (tonnes)
Municipal Solid Waste (MSW)	2009/10	294,000
Commercial & Industrial (C & I)	2008	375,000
Construction & Demolition (C & D)	2008	293,000
Hazardous Waste	2008	90,000
Metals (from all waste streams)	2008	131,000
Total		1,183,000

Table 2: Amount and Proportion sent to Landfill²

Waste Type	Total Amount Produced/Managed – tonnes/year	Amount sent to licensed landfill – tonnes/year	Proportion sent to licensed landfill
MSW (2009/10)	294,000	169,000	57%
C & I (2008)	375,000	314,000	83%
C & D (2008)	293,000	207,000	70%
Hazardous (2008)	90,000	85,000	94%

2.22 To help reduce the amount of waste generated within the county, the Waste Core Strategy contains planning policies to help guide development towards a more sustainable future.

¹ Figures taken from the Gloucestershire Waste Core Strategy, November 2012

² Figures taken from the Gloucestershire Waste Core Strategy, November 2012

Policy WSC1: Waste Reduction

- 2.23 The policy continues that all development will be expected to incorporate the principles of waste minimisation and re-use. Planning applications for 'major' development must be supported by a statement setting out how any waste arising during the construction and subsequent occupation of the development will be minimised and managed.
- 2.24 Specifically, the statement will include measures to:
- i. Minimise, re-use and recycle waste;
 - ii. Minimise the use of construction materials particularly primary materials;
 - iii. Minimise the pollution potential of unavoidable waste; and
 - iv. Dispose of waste that cannot be re-used or recycled in an environmentally acceptable manner.

3. ANTICIPATED WASTE STREAMS

3.1 Anticipated waste streams during the construction and occupation are outlined below.

Construction

3.2 Activities associated with the Proposed Development at the Land off Kidnappers Lane have the potential to result in the generation of considerable quantities of waste. The average amount of waste produced in construction of residential developments has been estimated at 15.2m³ per 100m² floor area³.

3.3 These figures give an indicative level of construction waste arising for the entire site. Benchmarks can be set, with the aim of achieving waste arising at the application site below these levels.

Occupation

Household Waste

3.4 It is anticipated that household waste arising from the proposed development will comprise the following materials:

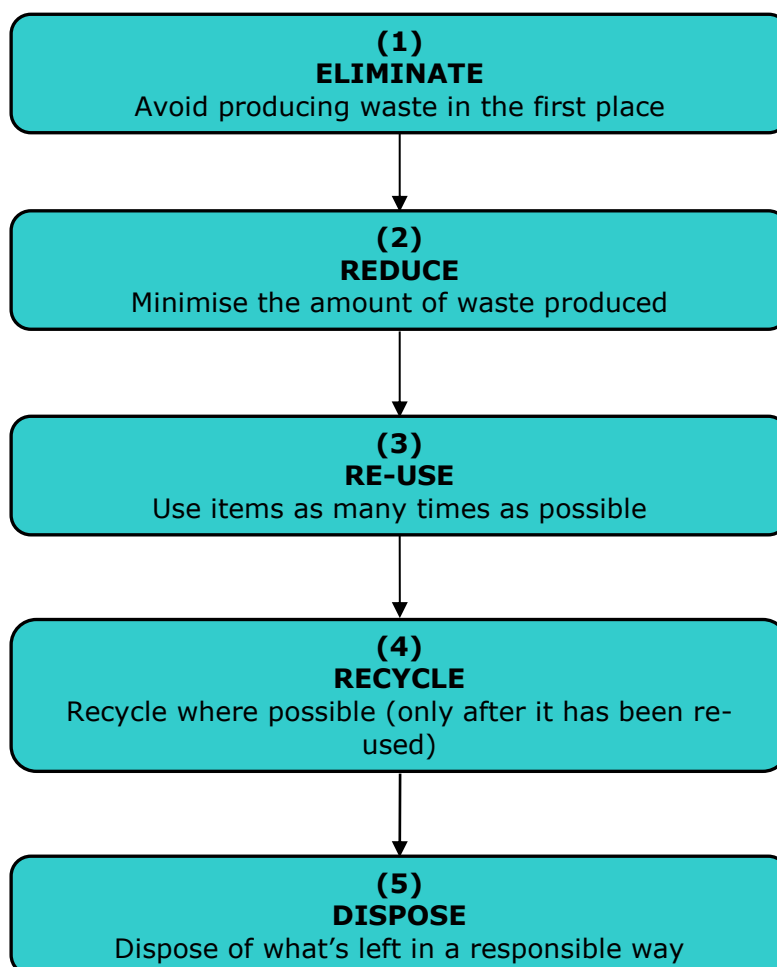
- Steel and aluminium containers;
- Telephone directories;
- Paper, newspapers and magazines;
- Plastic bottles;
- Cardboard;
- Glass;
- Textiles;
- Organic waste/biodegradables;
- Residuals (non-recyclables).

3.5 It is anticipated that refuse from the development proposals would be expected to mirror the current profile of municipal waste material collected across Gloucestershire.

³ Benchmarks for Predicting and Forecasting construction Waste, Annex 3, February 2009.

4. SITE MANAGEMENT

4.1 The fundamental strategy applied to the application site will be to minimise waste by applying a waste hierarchy to implement actions to Eliminate, Reduce, Reuse and Re-Cycle before considering disposal. The Waste Hierarchy is consistent with the objectives of the Waste Strategy for England, and other adopted policy documents.



4.2 The applicant will monitor and review the sustainability credentials of the development project. This offers the opportunity for further recycling and efficiency improvements and costs savings on the development site.

4.3 With regards to contamination and handling of hazardous substances, this will be dependent upon approval of the remediation strategy.

5. MANAGING WASTE ON SITE

Construction

- 5.1 Waste materials can be generated during the site preparation stage of construction and during the erection of buildings and installation of infrastructure.
- 5.2 Care will be taken during the design stage of the development to ensure that any material arising from site clearance and preparation can be re-used elsewhere on site wherever possible and practical.
- 5.3 Soils are an important resource, and to minimise effects to this resource, engineers must carry out precise take off calculations. To avoid wastage, with reference to DEFRA's Soil Strategy (2009), stripped soils will be stored in separate resource bunds no more than 3m high, and kept grassed and free from construction traffic, to ensure that the soil can be re-used elsewhere on or off site.
- 5.4 The primary measures to mitigate against the loss of soil resources will be to re-use as much of the surplus resources on-site in the cut and fill balance, detailed design of gardens, amenity and open spaces; to dispose of any surplus soils thereafter in a sustainable manner (i.e. as close to the Application Site as possible and to an after-use appropriate to the soil's quality).
- 5.5 The generation of construction-related waste from the construction of buildings can be significantly reduced through the choice of materials as submitted under the detailed element of the current application. Design considerations seek to minimise wastage from the build phase and are likely to follow these approaches:
- Maximise the use of reclaimed materials in the construction;
 - Maximise recycling opportunities at the end of the buildings life; and
 - Use prefabricated and standardised components in the standard product sizes (e.g. plasterboard panels, windows, doors). As these are made in factory-controlled environment, they tend to generate less waste and if standard product sizes are made use of, this minimises off-cut wastage on site.
- 5.6 Further incentive for the reduction of materials wastage during the construction stage is provided in the form of financial savings resulting from efficient use of products.

- 5.7 Construction operations will also generate waste materials as a result of general handling losses and surpluses and these wastes can be mitigated through good site practices, including proper storage and handling of materials to avoid damage, and accurate quantity estimates and efficient purchasing arrangements to avoid over ordering.
- 5.8 Construction activities on the site will be carefully managed to minimise waste production. As well as waste minimisation techniques, opportunities exist to avoid creating unnecessary waste, including:
- Segregation of construction waste on site to maximise potential for reuse/recycling;
 - Use of suppliers who collect and reuse/recycle packaging materials;
 - The off-site separation and recycling of materials where on site separation is not possible; and
 - Training of contractors in waste minimisation and materials reuse.
- 5.9 Suitable waste processing facilities for construction waste arisings will be identified and agreed with the Waste Planning Authority (WPA). These facilities will reuse, recycle and recover as much waste as possible generated from the construction process, and be located as close to the site as possible, in accordance with the proximity principle and the waste hierarchy structure.
- 5.10 Cumulatively, these strategies contribute to the overall reduction in waste materials that are generated in the construction process, in line with the requirements of the Gloucestershire Waste Core Strategy, which will in turn minimise the impact that the construction phase waste will have on the environment and landfill capacity in the district.

Occupation

Household Waste

- 5.11 The previously discussed Central Government and EU targets proposed for the reduction in municipal waste going to landfill are an important issue in the design of separation storage and collection facilities for recyclable and compostable materials. Gloucestershire County Council identifies that any new development

must detail, as part of the proposals, a sustainable strategy for dealing with the waste that will be generated by the development.

5.12 Accordingly, waste management and householder recycling initiatives will be incorporated within the scheme in cooperation with the operational requirements and standards of the waste management company who will perform the collection of waste from the occupied dwellings.

5.13 The production of waste materials can be mitigated by encouraging waste minimisation, household and commercial recycling through the following example schemes:

- Home composting;
- Garden waste collections;
- Kerbside collections; and
- 'Bring' facilities (such as recycling banks for glass, paper, cans and textiles).

5.14 Bearing in mind future residents will largely have to 'opt in' to schemes such as those outlined above, it is important that this is made as easy as possible.

5.15 Cheltenham Borough Council operates a fortnightly collection service of household refuse and a fortnightly collection service of recycling waste on alternative weeks. Also, the Council introduced the garden waste collection service in response to Government targets for increased recycling. Residents subscribe to the scheme, which usually costs £42.00 (discounted price of £39.00 applicable) for a year's subscription per bin. The garden waste bin is collected on a fortnightly basis. Additionally, food waste is collected from every household every week. It will be the responsibility of the residents to place the bins/bags at the curtilage of their property for collection on the appropriate day of the week.

5.16 It is widely proven that people will recycle more if the infrastructure is in place to make it easy for them to do so. Consequently, home-owner packs are proposed to be provided to new residents which will contain details of the procedures for kerbside recycling and waste collections.

5.17 In addition, Gloucestershire County Council operates 5 recycling centres within the county; the nearest to the application site being Hempstead HRC, St Anne's Bridge, Gloucester, GL2 5FR, which is open 7 days a week.

5.18 In addition, Cheltenham Borough Council also offer local recycling banks at the following locations:

- Caernarvon Road, Morrisons
- Everest Road, Old Patesians;
- Bath Terrace Car Park
- Swindon Road Recycling Centre;
- Manor Road, Sainsbury's;
- Church Piece Car Park;
- Edinburgh Place Car Park;
- Hatherley Lane, Asda;
- London Road, Sixways Car Park;
- Tewkesbury Road, Sainsbury's;
- Sr James Street Car Park;
- Whaddon Road, Cheltenham Town FC.

5.19 The Proposed Development will comply with Gloucestershire's household waste and recycling requirements. As such, sufficient provision will be made within each dwelling unit/curtilage for the convenient storage of the above receptacles, for example boxes with lids/wheeled bins for recyclable materials. It is important to 'future-proof' any scheme, taking into account the probable increase in future recycling as more waste is recycled to meet the targets set out above (and inevitably tougher targets in the future).

5.20 The above measures will substantially reduce the amount of waste generated by the development which goes to landfill and accord with the aspiration of the Landfill Directive to eliminate biodegradable municipal waste going to landfill for disposal. The strategy also promotes the recycling of a large number of materials commonly found in household refuse and will make a variety of recycling options open to new residents which should promote responsible waste management.

6. MANAGING THE OFF-SITE DISPOSAL PROCESS

- 6.1 Waste being removed off site for disposal includes waste for recovery and potential reuse / recycling and waste destined for landfill.
- 6.2 Wherever possible waste should be directed to transfer stations for recovery as this is preferential to sending to landfill.
- 6.3 The majority of recycling collected within Gloucestershire is taken to the Household Recycling Centres as highlighted above where it is sorted by hand. Once everything is sorted into the different materials they are sent to a reprocessor who recycles them into new products, for example recycled plastic bottles can become lots of different items from compost bins, watering cans or even fleece jumpers.
- 6.4 The Site Waste Management Statement as outlined above seeks to accord with the objectives set out in European, National, and Local policy documents to limit the amount of waste produced by the development which goes to landfill for disposal. This aspiration is not limited to objectives for municipal waste and also includes measures to reduce, reuse and recycle construction waste and trade waste.

7. CONCLUSIONS

- 7.1 This Waste Minimisation Statement sets out the principles of managing waste during the construction and operation of the development. The development proposals accord with the requirements of prevailing planning policy in that they minimise, as far as practically possible, the amount of waste being produced during design, construction, and operation stages.
- 7.2 Through this statement a strategy will be in place to ensure that the Council has certainty, prior to development commencing, that a robust process would be adhered to by the applicant in minimising waste, having particular regard to the waste hierarchy, which encourages avoiding the production of waste in the first instance, then reducing, re-using and recycling before considering the disposal of waste and only then in a responsible way.
- 7.3 The Waste Minimisation Statement seeks to ensure the movement of waste up the 'waste hierarchy' as defined in NPPW, and the development proposals are fully in accordance with the objectives set out in European, National and Local policy documents.