

Waste & Recycling Management Strategy

Brookleigh Phases 1.7 & 1.8



1. Introduction

The Outline Planning Permission for the overall Brookleigh development (ref.DM/21/3279) specifies the requirement, through Condition 17, for a Waste & Recycling Management Strategy (WRMS) to be submitted for each reserved matters area.

Extract of Condition 17, below -

17. No development shall proceed within each reserved matters area unless and until a Waste and Recycling Management Strategy for that reserved matters area has been submitted to and approved in writing by the local planning authority. Such strategies will be developed to set targets for the reuse, recyclability and environmental safety of building materials to be used across the reserved matters area. The development of that reserved matters area shall proceed in accordance with such approved details unless otherwise agreed in writing with the local planning authority.

Reason: In the interests of sustainability and to accord with Policy DP39 of the Mid Sussex District Plan.

An Environmental Management Plan is a Hill Group standard document that is live and updated during the course of the project. This document covers the following;

Environmental documents

- This Project Delivery Plan
- Method Statement Company Guidance
- Logistics & Traffic Management Plan
- Aspects and Impacts Register

Arrangements for controlling significant site risks

Significant Environmental Risks	Control Measures.
Emissions to Air, Ground, Water courses.	• Is Dust monitoring in place on the site boundary? • All activities that are likely to cause emissions must be managed accordingly. • Where possible, dusty activities must be damped down. • Min M Class Vacuums should be used on equipment that has potential to emit dust.
Noise	• Any Section 61 agreement in place? • Mitigation and monitoring requirements are contained within the agreement and must be complied with.
Pollution and Environmental Damage	• Spill kits will be located on site and personnel trained in their use. • All fuel and chemicals will be bunded to 110% and located on hard standing areas, away from drainage points.
Vibration	• Significant vibration works will be closely monitored. • Vibration reduction controls will be implemented on all tools and plant.
Ecology and wildlife	• Protection measure to be implemented as per site survey. • Inspection regime to be followed. • TBT to be given to all site personal.
Flora and fauna	• Protection measure to be implemented as per site survey. • Inspection regime to be followed. • TBT to be given to all site personal.

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2. Waste Minimisation and Management

Hill are committed to reducing the volume of waste produced through the application of the waste hierarchy in all its activities.

Hill use Smartwaste to manage and record all of its waste and energy requirements.

All Suppliers with responsibility for their own waste streams must provide the following documents:-

- Material Management Plan;
- Non-Hazardous or Hazardous Waste Carriers Licence issued by the Environment Agency for all companies removing waste;
- Environmental Permits (Waste Management Licence) for all facilities where all the hazardous and non-hazardous waste streams are transported to;

Transfer notes for controlled waste and consignment notes for hazardous waste must comply with regulatory requirements. Sufficient information must be provided to ensure that the waste disposal operator is aware of the potential hazards of the substance.

All Suppliers responsible for removal of their own wastes must report waste quantities (as tonnage) for each waste stream. Supporting Waste Transfer Notes must be made available to the Hill immediately on request.

Waste storage must comply with both pollution prevention legislation (PPG6) and waste permitting legislation. Should the site require any permitting for items such as waste water, crush material etc. they must contact their Sustainability Manager in advance to ensure full compliance.

3. Responsible Sourcing

Prior to commencement on site confirmation of validated chain of custody certification or responsible sourcing certification shall be provided by the supplier.

Suppliers will provide copies of delivery notes confirming the date of delivery, delivery location, type and quantity of materials.

When delivering timber to site delivery tickets must comply with the EU timber regulations. For more information please refer to Hill document [Timber Procurement](#).

4. Biodiversity requirements

The requirements of the all relevant legislation and policy guidance (e.g. Hill Biodiversity Policy Statement and local BAP) in respect to species and habitat conservation shall be complied with.

In the event of any unanticipated discoveries, work will halt in the area and Hill will be informed.

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5. Environmental Management System

This Environmental Management Plan is the vehicle for implementing the Company Environmental Management System. It is intended to set out the minimum standards for all project related activities and to provide a framework for managing and controlling the environmental issues associated with the site. The environmental risk register reviews the aspects and impacts of each task and the control and mitigation measures available to reduce any highlighted impacts.

Subcontractors will be made aware of the Policy through site inductions, briefings and training as required

a. Structure & Responsibility

Senior management will assume full responsibility for the Environmental Management Plan and will delegate to the line managers the responsibility for implementation.

b. Training

Training will be identified for all staff during the individual's annual review. Additional training and refreshers will be given through the following media,

TRAINING TYPE	LOCATION OF RECORDS
Environmental site induction – all staff	Maintained on site
Environmental Tool Box Talks – labour (minimum of 1/month)	Maintained on site
Site Managers Training Course	Training and Personnel

6. Environmental Legist

HPL will carry out the works in accordance with relevant UK legislation. The Quality Systems Manager maintains a full list of applicable legislation relevant to all tasks.

7. ENVIRONMENTAL OBJECTIVES & TARGETS

The environmental objective for the project is to ensure that all practical steps are taken throughout the contract to minimise the environmental impacts. Site-specific impacts and mitigation requirements highlighted from the environmental risk assessment and the documents supplied by the Client include, but are not limited to:

Compliance with Client requirements and Regional Business Plans (see relevant document for details)

EXAMPLE O & T's – must be specific to the contract using the risk assessment as a guideline

- Reduce waste
- Minimise water pollution
- Minimise nuisance issues

As a result of these findings, the targets are and site recorded monthly on our KPI return:

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8. Records

Records shall be compiled by HPL of any relevant environmental information that should be made available for any subsequent work or maintenance on the site. These shall include any pollution incidents, responses, actions taken and audit reports.

9. Communication

SPECIFIC TO THIS CONTRACT

RECORD	MAINTAINED BY	LOCATED	COMMUNICATED TO
EMS	Site Manager	In Site Manager's EMS File	All site staff (direct and indirect)
Site Inductions	Site manager	Site Office	All staff (direct and indirect)
Toolbox talks (1 per month)	Site Manager	Site Office	Labour as appropriate
Spillages	Site Manager	In Site Manager's EMS File	All staff (direct and indirect)
Complaints	Site Manager	In Complaints register	Contracts Manager and Env Manager

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10. OPERATIONAL CONTROL

Method statements or toolbox talks will consider the significant environmental impacts identified in the risk register and address the issues in order to supply mitigation measures wherever possible.

ALL SECTIONS MUST BE MADE SPECIFIC TO THE CONTRACT

11. Emergency Preparedness and Response

Site Managers are responsible for ensuring the site staff have been fully briefed on how to respond to emergency environmental incidents, the Quality Systems Manager has trained site managers, knowledge is tested at audits. Any specific training requirements will be brought to the attention of senior management and appropriate training arranged. The Pollution Incidence Control Plan will be displayed on all appropriate site notice boards and brought to the attention of all staff during their induction. A supply of absorbent granules containing oil digesters will be maintained on site at all times in sufficient quantities to deal with small-scale spillages and all staff will be aware of where these granules and appropriate shovels etc are stored.

Serious incidents must be immediately reported to the Quality Systems Manager and Senior Management in order for them to notify the nominated Clean-up contractor and the Environment Agency. The incident will be recorded, reported to the Client, Site Manager and the Quality Systems Manager who will conduct an investigation into the cause and effect of the incident, recommending an appropriate change in procedures where necessary.

All incidents requiring use of the absorbent materials will be recorded on the reporting form **Appendix A** and returned to the Environmental Advisor.

12. Site Waste Management Plan

Legal Requirement removed

All waste will be stored on site in suitable containers and removed in accordance with best practice requirements.

Good management will require the waste disposal route to be validated through the use of a phone call to the designated site. In normal circumstances this will only be necessary if the integrity of the haulage company becomes doubtful.

Waste reduction will follow the requirements of the waste hierarchy, reduce reuse, recycle, recover, regard waste as a resource not something that decreases the bottom-line. In order to reduce waste, waste streams will be segregated whenever possible to increase the re-use or recycling of material.

Wherever possible waste disposal shall be minimised through good management of housekeeping, a review of the design process and imaginative recycling. Buying materials will be checked against any value engineering and the QS will have knowledge of materials in the yard and on order at all times. Demolition materials will be counted as separated factions if they are sent for crushing by the demolition contractor and this is confirmed.

a. Permissions and Consents

Consents required may include:

- Hazardous Waste pre-registration,
- the site will be registered by HPL as a hazardous waste producer if hazardous waste is present.
- Number: CMO to provide when notified
- Any other consents required for water abstraction / discharge; waste exemptions or wildlife

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b. Traffic Management Plan

The Site Manager is responsible for identifying and securing traffic management consents and for maintaining consultation with the client. Further details will be included in the Project Plan.

c. Noise and Vibration

HPL will implement best practice throughout the contract. Regular meetings will be held with the clients at which noise can be discussed. All mitigation measures will be employed including the programming of the works.

Plant will be requested as electric or super-silenced diesel as practicable if required. If necessary, plant will be screened.

d. Dust

Dust will be controlled mainly through the use of dampening down with a fine mist of water and using dust suppressant tools. Enabling works will be monitored for dust and noise.

Skips will be sheeted before leaving the site if the contents are likely to cause a nuisance.

e. Air Pollution

Air pollution will be controlled through regular maintenance of plant and additional servicing when required. All plant will be switched off when not in use.

Substances emitting strong odours will be investigated for an alternative equivalent product. There is a presumption of water-based paints both internal and external.

f. Water

No substance will ever be discharged to a surface water drain; foul water drains may be used to dispose of some silty or foul water **IF** the consent of the sewerage undertaker has been sought. Management of activities through method statements, toolbox talks and inductions will ensure the workforce are aware of the need to retain water quality. Activities like concrete pours and washing out the chutes must be managed effectively.

Potentially polluting substances will be stored in suitably bunded areas in order to reduce the potential for ground contamination and, therefore, groundwater contamination. If polluting substances penetrate the ground the ground will be dug up and removed and replaced with a suitable replacement material. The polluted, excavated material will be disposed of according to legislative requirements. This is in order to prevent redress under the Contaminated Land Regulations 2000 and remove any potential expensive clean-up claims. Absorbent material containing oil digesters will be stored on site for use on minor spillages. If a pollutant can be soaked up before it penetrates the ground it should be. If a spill does occur a monitoring regime of the canals and rivers will be implemented to ensure the pollution does not reach the water courses and if it does it will be promptly and efficiently managed. The statutory bodies and client will be notified and a clean up operation begun as per the company procedures.

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g. Diesel

All diesels should be stored in double skinned mobile bowzers or double skinned diesel tanks. A designated re-fuelling (hard-standing) area will be made available for plant that is 10 metres plus from any drains. All diesel/ hydrocarbons and potentially harmful substances not stored within a double skinned bowser will be stored in a bunded area. The bund will comply with Environment Agency recommendations and UK legislative requirements. When there are a number of drums stored within the bund the bund will be capable of holding not less than 150% of one of the drums. All drums and their bunds should be covered with something like a tarpaulin to prevent collection of rainwater, an expensive commodity to remove as hazardous waste. Any diesel in a single skinned tank will be placed within a bund that will be impermeable and be capable of holding 110% of the contents stored within it.

h. Ecology

Protected flora or fauna, if none state the fact and how we know.

- Any invasive weeds?
- Any trees or vegetation to be protected throughout or removed; when and how?
- Protected species will be dealt with in accordance to the law e.g. bats and birds will not be disturbed when roosting or nesting and work will cease if newts, common lizards, slow worms etc are sighted in order to have them removed to a position of safety and Natural England notified

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