



BEDFORD
BOROUGH COUNCIL

Technical Guidance: **Waste Audits for New Developments**

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Introduction

This Technical Advice Note (TAN) provides guidance for the planning process with respect to policies W5 of the adopted Bedfordshire and Luton Waste Local Plan 2005, policy 49 of the Bedford Borough Local Plan 2030 and policy LLP37 of the Luton Local Plan 2001-2031. These policies are intended to ensure that waste management issues associated with the construction and operation of new development proposals are considered at an early stage.

The TAN aims to offer practical guidance to those involved in the development process to reduce, reuse and recycle waste. This will help to move towards a circular economy and reduce carbon emissions which will benefit businesses, local residents and the environment.

Planning and design

Careful planning and design for waste management at the outset can save time and expense later. Planning and design of a development project will comprise two key elements;

- Reducing waste and maximising recycling and re-use during the construction of a development; and
- Ensuring that waste can be easily and effectively stored and collected when the development is built through careful layout and design of buildings, external spaces and roads.



What is required with a planning application?

All of the planning policies relevant to this TAN require a waste audit to be submitted with the planning application. A waste audit is a written document which shows how opportunities for the reduction, recycling and re-use of waste during the construction and occupation of the development will be taken account of.

The process of waste auditing allows developers to consider how waste will be managed in new developments and hence how they can contribute to sustainable development. Good waste management practice has economic, environmental and social benefits.

When is it required?

The principles of sustainable waste management practice apply to all developments. This includes new buildings and engineering operations, change of use, refurbishment and conversion. It is recognised however that waste auditing will only be required for new developments. It is also true that the larger developments will tend to have greater implications for using resources and generating waste. However, the cumulative impact of a large number of small developments can also be significant.

The requirement for waste audits should be realistic and should be appropriately related to the scale of development proposed. It is therefore appropriate to set thresholds at which the waste audit requirement should apply. The Councils consider that this should be related to the volumes of waste likely to be produced during construction and occupation. The volume of waste will relate broadly to the scale of development although more waste may be generated from using previously developed land or buildings. In order to provide practical guidance which is easy to implement, the thresholds relate to those currently recognised within the planning system. This assumes that larger developments will generate significant quantities of waste. There may be exceptions to this general rule and where applicants are able to demonstrate that the level of waste generated is not significant, a full waste audit may not be required. The Councils would expect the applicant to provide information regarding the estimated quantities of waste likely to be produced and a justification as to why this is not considered significant.



Many of the detailed requirements for new development will, of course, be similar for both small and large developments e.g. space requirements for waste storage in new dwellings. In some cases, different issues may be raised by larger developments such as the provision of or contributions towards centralised facilities which may be required. It is therefore important that waste audits are tailored to reflect these different elements.

Developments have therefore been categorised into three groups as follows.

Major developments requiring Environmental Impact Assessment (EIA)

Certain major developments (see definition below) which have significant environmental effects are required to undergo an EIA under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations. These regulations set out in more detail the types of development and circumstances where EIA is required. Under the EIA Regulations and accompanying government guidance the effects of a development on waste is a relevant consideration.

Major developments

This category includes developments which fall into the definition of “major” development used by the MHCLG and set out in the General Development Procedure Order (GDPO) (i.e. > or = 10 dwellings or other developments over 0.5 Ha or 1000sq.m gross floorspace). These are considered to generate significant volumes of waste during their lifetime.

Minor developments

This category includes developments which fall below the GDPO definition set out above. This includes individual domestic extensions, and other minor engineering or construction works, new dwellings, and smaller industrial, commercial, leisure and retail buildings, car parks, new roads and other infrastructure.

Waste Audit checklist

The level of detail required for a waste audit will vary according to which category the development falls into as follows:

In the case of **minor developments**, applicants can submit an optional Waste Audit which addresses the key issues in the Waste Audit checklist.

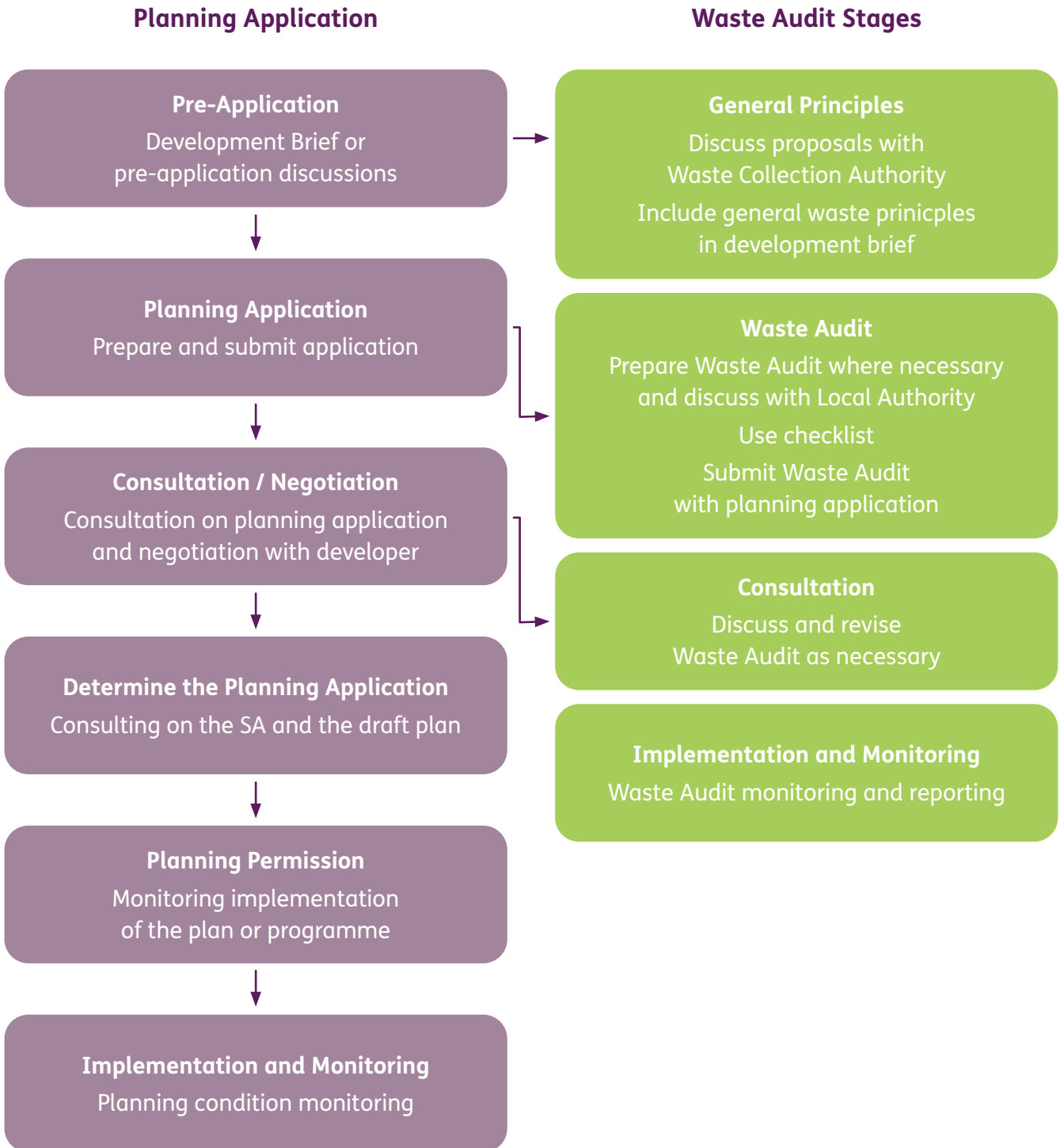
In the case of **major developments**, applicants are expected to complete a waste audit statement as a component of a design statement prepared with a planning application.

For **major developments requiring EIA**, the waste audit should form part of the Environmental Statement, and the applicant is expected to provide both an overall strategy for waste management in the development as well as a more detailed audit.

The latter could, in the case of outline planning applications, be dealt with through the submission of reserved matters.

How should a Waste Audit be carried out?

The diagram below illustrates the relationship preparing the planning application and the waste auditing process.



Before submitting a planning application

On larger development sites it is now common practice to prepare Development Briefs and/ or Master Plans which may in themselves be adopted as Supplementary Planning Documents. Waste management should be an essential element in preparing a Development Brief. Although it is not appropriate to go into detail in these documents, it will be possible to set out overall design principles for waste management. A full waste audit is unlikely to be necessary at this stage however some assessment does need to be carried out to feed into the Development Brief/Master Plan



In all cases developers are urged to enter into pre-application discussion with the Local Planning Authority regarding their proposals and the implications for waste management. Developers are also advised at this stage to discuss their proposals with the relevant Waste Collection Authority (contact details are provided at the end of this document). This is to ensure that facilities are compatible with the collection systems operated by the Councils and their contractors. The Waste Collection Authority have prepared separate technical guidance on this.

Planning applications. Applicants/developers will be required to prepare and submit a Waste Audit to accompany their planning application.

Approval of Site Waste Management Plans is not required by the planning authority. However, developers may use them to address the construction phase of the required Waste Audit.

What if the application is for outline planning permission?

Where the details of the application are undecided, an outline Waste Audit should be submitted although this may only deal with broad principles of waste management in the development. It should contain a commitment to achieving high standards. A more detailed audit covering tonnages, methods and timescales should be submitted as part of the reserved matters applications.

What happens if a Waste Audit is not submitted?

It is not appropriate to defer the submission of Waste Audits through the use of planning conditions (except in the case of outline planning applications). The waste audit is important for decision makers to be able to take waste issues into account. Local Planning Authorities are able to refuse planning applications if insufficient information is provided to allow them to determine the effects of the development. This could also apply to waste audit information where the Local Planning Authority consider that the applicant has failed to comply with relevant policies of adopted Local Plans. In practice where relevant waste information is not submitted Local Planning Authorities will request that this is submitted prior to determining the application.

How can the requirements of a waste audit be controlled, monitored and enforced?

Use of planning conditions and legal agreements

Ensuring that the requirements of a waste audit are carried out is a key concern. Planning conditions can be imposed to require waste audits or particular key requirements to be adhered to. Some potential standard conditions are set out below in Appendix A. In the case of waste audits during the construction phase, it may assist monitoring and enforcement if a requirement is imposed for periodic reports to be submitted on how the audit is being complied with. For large scale developments, planning obligations may be a better approach. Planning obligations will also be required where a financial contribution towards provision of facilities on or off site has been agreed.



Construction Waste

More efficient use of waste in construction will help make the best use of resources. This can be achieved through on-site management and reuse of materials and through maximising the use of recycled content.

Key issues for on-site management are:

- Avoiding over-ordering materials.
- Prefabrication off site to reduce off-cuts and product surplus.
- Segregation of waste materials on site to aid recovery.
- Re-use and refurbishment of existing infrastructure and materials.
- On site crushing and recycling of demolition waste.

Key issues for maximising the use of recycled content are:

- Selection of products and materials with good practice levels of recycled content.
- Efficient design to minimise the use and waste of materials.
- Use of renewable resources from legal and sustainable sources (such as timber).

There are many organisations which publish guides on best practice in construction and these include:

- Construction Industry Research Information (CIRIA) www.ciria.org
- Waste Resources Action Programme (WRAP) www.wrap.org.uk
- Building Research Establishment (BRE) www.bre.co.uk

Appendix A

Potential standard conditions

The conditions shown below are suggested as a guide as to how the requirements of relevant policies might be implemented through planning permissions. Not all of these conditions will be appropriate for all developments and their suitability should be assessed on a case by case basis.

Compliance with the Waste Audit

The development hereby permitted shall be undertaken in accordance with the approved Waste Audit (Ref)

Reason: to ensure that the development conforms with the waste audit requirements in accordance with objectives of Policy 49 of the Bedford Borough Local Plan 2030.

Location of facilities/storage areas

Prior to the occupation of the development hereby permitted the areas allocated on Plan/Drawing No. to be used for the storage of waste/recyclate/compostable material shall be laid out in accordance with the details set out in the approved Waste Audit and shall not be used for any other purpose.

Reason: to ensure that dedicated storage areas for waste materials are provided and maintained as such. To accord with objectives of Policy 49 of the Bedford Borough Local Plan 2030).

Monitoring reports

Prior to occupation of the development hereby permitted a statement shall be submitted to the Local Planning Authority demonstrating how the measures contained in the Waste Audit (ref...) have been implemented. The development hereby permitted shall not be occupied until the statement has been approved in writing by the Local Planning Authority.

Reason: to ensure compliance with the Waste Audit and to facilitate monitoring of waste arisings from the development and implementation of ongoing waste management measures in accordance with objectives of Policy 49 of the Bedford Borough Local Plan 2030.

NB –The condition could be modified to require occupiers of individual buildings/parts of the development not to be able to occupy until the monitoring report has been signed off. In the case of residential development, a phased programme of reporting linked to completion/occupation of specified numbers of properties may be more appropriate.

Reserved matters condition for outline planning applications

Before the development hereby permitted is commenced a detailed Waste Audit addressing any the construction and subsequent occupation of the development has been submitted and approved in writing by the Local Planning Authority. The Detailed Waste Audit must be in accordance with the

approved Outline Waste Audit (ref...). The Detailed Waste Audit must include details of:

1. The anticipated nature and volumes of waste that the development will generate.
2. Measures to maximise the re-use on-site of waste arising from demolition/engineering/landscaping.
3. Steps to be taken to ensure effective segregation of wastes at source during demolition and subsequent construction of the development including, as appropriate, the provision of waste sorting, storage and recovery and recycling facilities.
4. Any other steps to be taken to minimise the generation of waste throughout any required demolition and during construction of the development.
5. Provision within the proposed development to encourage occupiers to manage their waste effectively and sustainably. This may include provision for waste and recycling storage areas, roads and development layouts which allow waste and recyclables to be collected effectively, provision of community recycling facilities.
6. Provision for monitoring the implementation of steps 1 – 5.
7. A timetable for implementing steps 1 – 6.

Reason: To ensure that waste is managed sustainably during the development in accordance with objectives of Policy 49 of the Bedford Borough Local Plan 2030.

Notes

Finding out more

If you would like further copies, a large-print copy or information about us and our services, please telephone or write to us at our address below.

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Minerals and Waste Planning Service

At the time this document was published, minerals and waste planning advice in Bedford Borough is provided by a shared service based at Central Bedfordshire Council.



mwapplications@centralbedfordshire.gov.uk

Waste Services Team



recycling@bedford.gov.uk



01234 267422



Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP



www.bedford.gov.uk