



Hillington Park – Proposed Simplified Planning Zone

Waste Management Strategy



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1 Introduction

ENVIRON UK Limited (ENVIRON) has been commissioned by Terence O'Rourke Limited, on behalf of MEPC to prepare a Waste Management Strategy as part of the supporting information for the introduction of a Simplified Planning Zone (SPZ) at Hillington Park, Glasgow.

1.1 Objectives

The objectives of this Waste Management Strategy are to identify the areas requiring consideration with respect to the proposed development at the site under the SPZ with regard to waste arisings, waste disposal infrastructure and waste management practices during demolition and construction works and once developments permitted under the SPZ provisions are implemented and operational.

1.2 Scope

The strategy provides:

- A review of national, regional and local waste policies and identification of legislative and policy factors that will influence the development consented under the SPZ with respect to waste management;
- Factors that will require to be considered with respect to waste generated during future demolition, construction and upon completion (i.e. during operation) of the development consented under the SPZ; and
- A checklist for use by Developers under the SPZ and the planning authorities to ensure appropriate information is available as part of developments under the SPZ with regard to waste management.

1.3 Structure of this Report

As an introduction, the report gives a summary of the proposed SPZ, including its location. This is followed by sections presenting a summary of the relevant legislation and policy documents and the areas for consideration with respect to waste management during future development and operation within the SPZ. The checklist summarising the information to be provided by Developers under the SPZ is provided as Annex A.

2 Background to the Project

2.1 Site Location

The proposed SPZ site is located approximately 7 km west of Glasgow city centre, as shown on Figure 2.1. It is currently occupied by Hillington Park, a mixed industrial and commercial park, and further land designated for employment uses. Hillington Park covers an area of approximately 199 hectares. The immediate boundaries are defined by:

- the M8 motorway, including its junction 26, to the north;
- a railway line and further industrial units to the east;
- a railway line, as well as Hillington West and Hillington East stations to the south; and
- Penilee Road and undeveloped land to the west.

The administrative boundary between Renfrewshire Council and Glasgow City Council areas runs north-south through the eastern area of the site such that the larger, western portion of the site lies within the area of Renfrewshire Council, and the eastern portion of the site lies within the area of Glasgow City Council.

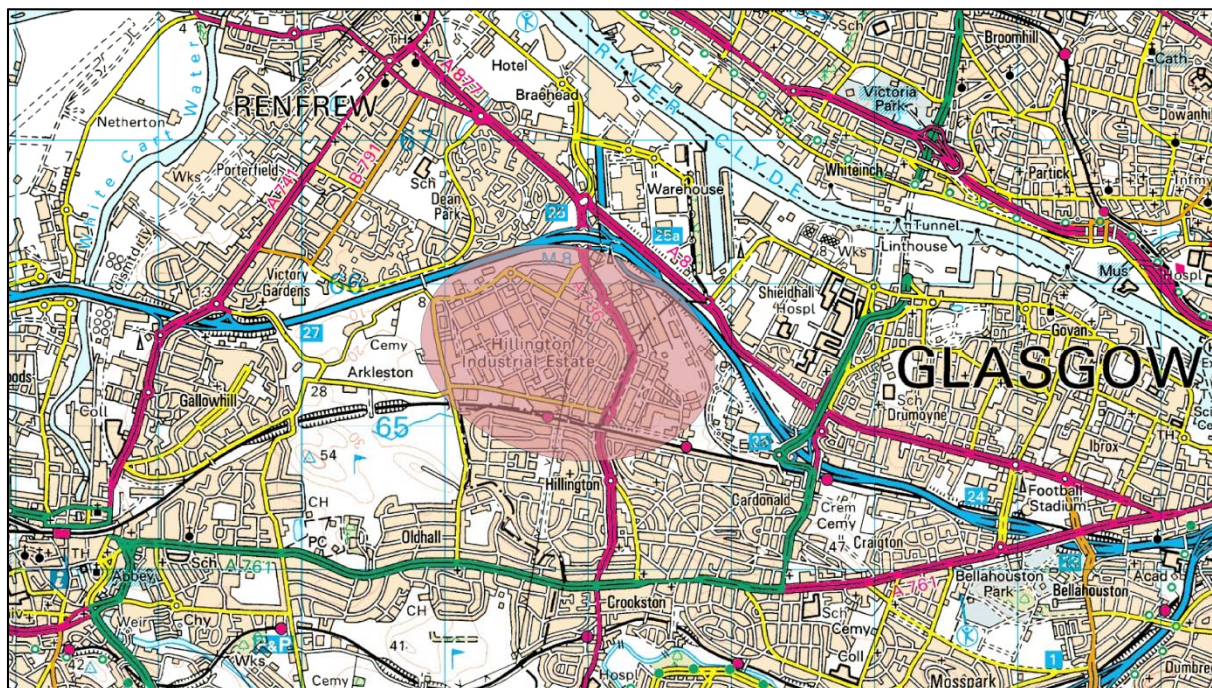


Figure 2.1: Site Location

2.2 Proposed SPZ

The site contains a business park providing offices, commercial premises and industrial units. Over 270 organisations are currently based on the site, engaged in manufacturing, distribution, technology and the services sectors. Hillington Park represents an area of strategic employment in the west of Scotland.

There is currently in the region of 400,000 m² (40 ha) of employment land on the site, and it is proposed to increase the level of employment land by approximately 10-15% and also introduce a greater range of ancillary or complementary uses, such as small scale retail and improved leisure facilities through the introduction of an SPZ.

The purpose of the proposed SPZ is to simplify planning control by removing the need for a full planning application for development falling within defined parameters. It is anticipated that a Waste Management Strategy will require to be addressed under the conditions of the SPZ.

2.3 Assumed SPZ Approach

It is assumed that development brought forward under the Hillington SPZ will be phased in approach.

This Waste Management Strategy identifies areas for focus by such parties and applies the term "the Developer" which is intended to include the development teams working on behalf of each individual Developer.

3 Policy Context

The methodology for the Waste Management Strategy involved completing a detailed policy review of current national, regional and local waste policies to provide a specific policy context for the strategy. This exercise has informed the content of a bespoke Waste Management Strategy, which identifies areas for consideration both during the demolition/construction and operational phases of the future development within the SPZ.

3.1 Policy Context

3.1.1 European Directives

Much of the waste and environmental legislation enacted in Scotland and the UK comes directly from European Union (EU) waste policy in the form of a series of Directives with the main legislative drivers being the Waste Framework Directive (WFD) (2008/98/EEC) as revised and Landfill Directive (Council Directive 1999/31/EC) and is translated in to national, area and local policies as follows.

The WFD introduced the Waste Hierarchy of:

- Reduce;
- Reuse;
- Recycle; and
- Dispose.

Using the Waste Hierarchy, the WFD aims to produce a “recycling society” by 2020, with each Member State required to achieve re-use and recycling targets by that date. The directive obliges Member States to establish waste management plans and prevention programmes (with 5 year prevention objectives).

3.2 National Legislation and Policy

3.2.1 Scotland's Zero Waste plan

Following public consultation in 2009, Scotland's Zero Waste Plan was launched on 09 June 2010. The Zero Waste Plan promotes the waste hierarchy introduced via the WFD, superseding the previously existing National Waste Strategy Scotland and setting long term targets for recycling 70% of all Scotland's waste with only 5% of remaining waste being landfilled by 2025.

The Zero Waste Plan promotes a society (Zero Waste Scotland) where there are high levels of recycling and composting with a target of 70% recycling and composting for all waste (including household) by 2025.

3.2.2 Environmental Protection Act 1990 – Duty of Care

The Environmental Protection Act 1990 sets out a general duty of care on waste producers to ensure that controlled wastes are disposed of in a manner that does not cause pollution of the environment or harm to human health. Enabling regulations set out the system for controlling the movement of controlled wastes and Special Waste and make stipulation for the documentation of waste transfers and disposal.

During both site development and operation, as with any activity that may produce controlled waste, it will be the responsibility of the producer of the waste to ensure that adequate

systems are put in place to meet the requirements of waste regulations including the Environmental Protection (Duty of Care) Regulations 1991, as amended, and the Special Waste Regulations 1996, as amended.

3.2.3 The Waste (Scotland) Regulations 2012

The Scottish Government's Waste (Scotland) Regulations 2012 were introduced on 09 May 2012 to help Scotland achieve its goal of becoming a zero waste society. The Regulations amended Section 34 of the existing Environmental Protection Act 1990 and under these amendments, holders of waste, including producers, have a duty of care to take reasonable steps to increase the quality and quantity of recyclable materials. The regulations also intend to minimise residual waste and move its management up the waste hierarchy

On 01 January 2014, changes were introduced including the following:

- All businesses are to present recyclable materials (e.g. metals, paper, glass, card, plastic) for separate collection (i.e. segregation at source);
- Food businesses (except in rural areas) producing over 50 kg (and 5kg from 2016) of food waste per week will be required to separate food waste for recycling; and
- A ban on any metal, plastic, glass, paper, card and food collected separately for recycling from going to incineration or landfill.

3.3 Regional Legislation and Policy

3.3.1 Glasgow and Clyde Valley Strategic Development Plan

The Glasgow and Clyde Valley Strategic Development Plan (SDP), prepared by the Joint Committee on behalf of eight local authorities (including Glasgow City and Renfrewshire) was approved by the Scottish Government in May 2012 and published in July 2012. The key aim of the SDP is to set out a long-term Spatial Vision and related Spatial Development Strategy. The SDP provides the overall geographical framework of development within which the constituent local authorities will formulate their Local Development Plans (LDP) and within which they will assess planning applications and proposals.

Strategy Support Measure 13 within the SDP specifically relates to waste. It states appropriate infrastructure should be provided to meet the targets set out by Zero Waste Scotland, which will support the Spatial Development Strategy. In addition, development proposals for waste management facilities will generally be acceptable in industrial and storage or distribution locations, and at existing waste management facilities particularly where there exists the opportunity to maximise the potential for the re-use of waste heat through co-location with potential heat users.

3.4 Local Legislation and Policy

3.4.1 Glasgow City Council Waste Strategy (2009)¹

The Waste Strategy comprises of four elements that provide a holistic approach to the management of waste within Glasgow. The four areas are Collection, Recycling, Residual Waste Treatment and Landfill and the introduction of these key elements should assist in

¹ Glasgow City Council Waste Strategy (published 22/02/2010), available <http://www.glasgow.gov.uk/CHttpHandler.ashx?id=11089&p=0> accessed 07/01/2014

reversing the hierarchy trend, moving the disposal element to the bottom of the hierarchy, aiding the delivery of policy targets and zero waste aspirations.

ENVIRON notes that this Strategy was implemented prior to the introduction of Scotland's Zero Waste Plan which resulted in a need for Councils to revise their Waste Strategies.

3.4.2 Glasgow City Local Plan (2009)²

Details on implementation of the waste strategy are included in the Glasgow City Local Plan (adopted December 2009). Specifically, Policy DES 12: *Provision of Waste and Recycling Space* notes that the council requires space to be provided for recycling facilities within the curtilage of new developments and that the provisions should be appropriately designed for storage, recycling and collection of waste.

Policy ENV 11: *Treatment of Waste and Recycling Materials* of the adopted Glasgow City Local Plan aims to ensure that the City can accommodate an appropriate range of facilities and sites to treat and recycle domestic and commercial/industrial waste, without detriment to the environment.

The policy indicates that proposed waste management or recycling facilities should be located:

- Within areas designated for Industry or Business use;
- Preferably on derelict or degraded sites or existing waste management sites where these have not been converted or are planned to be converted to other uses; and
- To accord with sustainable transport principles.

The Council will work with the private sector and other partners to identify sites for a range of recycling activities for domestic and non-domestic material.

3.4.3 Renfrewshire Proposed Local Development Plan (2013)³

As is noted above, the introduction of Scotland's Zero Waste Plan resulted in a need for Councils to revise their Waste Strategies. ENVIRON's correspondence with the Council has determined that it does not currently have a Waste Strategy, therefore the following document is the most relevant in setting out the Council's strategy with respect to waste with actual operations governed by current regulations.

The Renfrewshire Proposed Local Development Plan (2013) sets out the spatial strategy that will facilitate investment and guide the future use of land in Renfrewshire. The policy statements within the plan provide a framework for decision making to ensure that development and changes in land use are appropriate. Policy I8 relates to waste management and states that:

² Glasgow City Local Plan (adopted December 2009), available <http://glasgow.gov.uk/index.aspx?articleid=5624> accessed 07/01/2014

³ Renfrewshire Proposed Local Development Plan (2013), available <http://www.renfrewshire.gov.uk/wps/wcm/connect/9615c705-f609-4da6-bae4-d871ca380e94/renlocaldevplan2012+%28Bookmarked+130108%29.pdf?MOD=AJPERES> , accessed 27.01.2014

- Existing waste management infrastructure and facilities will be safeguarded where they support delivery of the Zero Waste Plan and incompatible uses in the vicinity of current sites will be resisted.
- Development proposals for waste management infrastructure on new or existing sites must demonstrate how it conforms to, meets and delivers the Zero Waste Plan objectives.

Under the Proposed LDP, new and existing waste management sites should be located in appropriately accessible areas with no adverse impacts on existing road networks and transportation of waste should be kept to a minimum. Sites should also be located on (or adjacent to) land previously licensed for waste management purposes or on land capable of supporting waste management processes without significant impact on amenity or operation of other uses.

4 Required Waste Considerations: Construction Phase

The following presents the areas (relating to waste management) that must be given consideration by any development to be brought forward under the SPZ with respect to the construction phase (including demolition of existing structures, modification of existing structures, development of external areas).

A checklist (Checklist 1) for the Construction Phase is presented in Annex A for use by both Developers under the SPZ and the planning authorities which summarises requirements identified in the following.

4.1 Waste Reduction

Works carried out during the demolition and construction (including refurbishment) phases must consider the waste hierarchy, therefore there is need to consider reducing the amount of waste produced during the work. Maximising the recovery of materials and components during the demolition and excavation works has economic, as well as environmental benefits. In this regard, the recycling and re-use of demolition waste reduces disposal costs and the amount of landfill tax payable.

Prior to commencing demolition of existing structures and or/ construction to facilitate redevelopment consented under the SPZ, the Developer will identify means of reducing waste, including (but not limited to) consideration of the following:

- Crushing and reuse on-site of brick and concrete arising from the demolition;
- Recovery and recycling of metal from existing structures;
- Lean purchasing protocols so that only the amount of construction materials required are purchased, thus reducing waste during construction;
- Just in time deliveries so that the materials are received when needed; and
- Use of pre-fabricated building elements where possible.

The above considerations will be presented in a Construction Phase Waste Management Plan to be developed by the Developer and submitted to the planning authority prior to commencement of development.

The Construction Phase Waste Management Plan must include detail of the calculated volumes of wastes and materials for recovery and/or reuse/recycling (demonstrating consideration of the waste hierarchy as detailed above) and clearly define the means by which they will be managed including disposal routes and volumes and volumes for recovery and reuse on-site. The Developer must ensure that all identified waste management and recovery routes satisfy Duty of Care requirements as described in Section 3.2.2.

4.2 Waste Storage

Prior to works commencing, the Developer will identify appropriate storage areas for waste materials (i.e. those destined for off-site disposal or recycling) and for materials to be reused on-site. All such storage areas will be located away from surface water drains and will be subjected to appropriate controls (e.g. runoff management, dust management).

Activities such as temporary stockpiling of stated volumes of construction/demolition wastes are exempt from the Waste Management Licensing (Scotland) Regulations 2011. However they are still subject to statutory control in order to minimise the risk of pollution of the environment. Therefore application must be made for registration as exempt activities with

the Scottish Environment Protection Agency (SEPA). It will be the responsibility of the Developer to ensure that appropriate exemptions are obtained and all other relevant regulatory controls are adhered to.

The Developer will detail the identified waste storage areas (including drawings showing their location), detail the appropriate environmental and regulatory controls to be implemented within a Construction Phase Waste Management Plan to be developed by the Developer and which it will submit to the planning authority prior to commencement of the development.

4.3 Waste Transport

Prior to construction or demolition commencing, the Developer will identify the most appropriate transport routes for traffic movements associated with waste management, including consideration of other potential environmental issues such as control of dust and impact to the wider site/site users.

The identified transportation routes (including drawings) will be included in the Construction Phase Waste Management Plan to be produced by the Developer and submitted to the planning authority prior to commencement of the development.

4.4 Management of Contaminated Materials

Prior to demolition of existing structures, the Developer will determine the need for asbestos surveying and will undertake specialist removal of any asbestos in order to appropriately manage the associated risks prior to demolition. All asbestos wastes will be appropriately stored and disposed off-site using specialist contractors.

A separate Contaminated Land Strategy has been produced for the proposed SPZ at Hillington Park (ENVIRON Report Ref: RUK1919567_1_Conland). Should contaminated land be identified in the pre-development stages, a specific strategy will be developed by which the environmental risks are appropriately managed. That strategy will also include protocols to be implemented should contaminated soils and/or groundwater be identified during the construction works (i.e. in areas not identified during any pre-construction site investigations). Developers under the SPZ must consider how any contaminated material (soil, water, demolition arisings or similar) which is to be disposed of as a waste will be managed, handled and disposed of.

The strategy for management of contaminated materials will be included in the Construction Phase Waste Management Plan to be developed by the Developer and submitted to the planning authority.

4.5 Additional Guidelines and Best Practice

In addition to the legislation and policy presented in Section 3, there are construction specific guidelines and best practice documents that relate to waste management, including (but not limited to) the following:

- Pollution Prevention Guideline (PPG) 6: Working at Construction and Demolition Sites, produced by the various UK Environment Agencies (including SEPA); and
- Protocols developed by WRAP (the Waste and Resources Action Programme) relating to waste management during construction and resource efficient procurement,

The Developer will ensure that all relevant protocols and best practice are detailed in the Construction Phase Waste Management Plan to be developed by the Developer and submitted to the planning authority.

It will be the Developer's responsibility to ensure that all protocols set out in the Construction Phase Waste Management Plan are adhered to during the demolition and construction phases.

5 Required Waste Considerations: Operational Phase

The following presents the areas (relating to waste management) that must be given consideration by any development brought forward under the SPZ with respect to the operation of the development.

A checklist (Checklist 2) for the Operational Phase is presented in Annex A for use by both Developers under the SPZ and the planning authorities which summarises requirements identified in the following.

5.1 Waste Reduction

As per works carried out during demolition/construction, there is a requirement to consider the waste hierarchy during operation of the development. Given the type of development (i.e. individual tenanted units comprising a variety of business types), it will be the responsibility of the individual tenants to implement waste reduction measures.

5.2 Storage of Wastes

All operations under the provisions of the SPZ will need to comply with the Waste (Scotland) Regulations and particularly to ensure that all waste producers fully enact their Duty of Care.

Appropriate storage areas for wastes will be necessary for all developments consented under the SPZ. Any development consented under the SPZ will require wastes to be segregated and an adequate number of suitable receptacles (i.e. bins/skips etc.) provided for secure and appropriate storage of generated wastes prior to uplift. The storage areas must be located in accessible spaces to allow for vehicle collection.

It will be the responsibility of the Developer to ensure that all development consented under the SPZ is provided with appropriate waste storage areas that will enable the tenants to implement waste segregation and storage provisions that comply with contemporary regulations.

5.3 Disposal/Recycling of Wastes

Enquiry to both Glasgow City and Renfrewshire Councils has identified that Glasgow City Council operates a service for collection of some commercial wastes but does not currently provide widespread commercial waste recycling facilities and that there are no designated waste disposal or treatment facilities within the Renfrewshire Council boundaries for commercial/industrial waste. However, privately owned facilities licenced to process commercial waste (operated by William Tracey Recycling and Resource Management Group) are located in Linwood which are likely to be the closest such facilities to the Hillington SPZ.

Considering the above, it is probable that waste producers on the Hillington Park will require to arrange private uplift of their wastes to achieve appropriate management of their wastes in keeping with the ethos of Scotland's Zero Waste Plan, i.e. it is unlikely that one single waste contractor will service all the units. This will likely result in a number of waste collections made at different times for different waste types across the Hillington Park area.

As the types and number of businesses that will occupy the Hillington Park as development consented under the SPZ is currently unknown, it is not possible to currently estimate likely volumes and types of waste that will be generated, nor is it possible to identify the most

appropriate local sites for management of the wastes or comment on their currently existing capacities.

Therefore it will be the responsibility of the individual tenants, liaising with the Hillington Park management team as necessary, to ensure that appropriate waste management contractors are employed to manage the wastes derived from their premises and for the occupants to ensure their Duty of Care is fulfilled, including ensuring that the final point of disposal/recycling is appropriate.

5.4 Transport of Wastes

As is described in the preceding sections, waste uplift will involve separate collections of dry recyclables in addition to collections of non-recyclables (i.e. waste destined for landfill) and any compostable wastes.

Given that development consented under the Hillington SPZ will be phased in approach, it will be the responsibility of each Developer (in liaison with the Hillington Park management team as appropriate) to consider the required vehicular access for each unit and ensure that appropriate transport routes are available to facilitate waste collection.

5.5 Additional Guidelines and Best Practice

The Developer must ensure that the design of waste management provisions (e.g. waste storage areas) adheres to all applicable design and any specific local regulatory standards.

6 Summary

This Waste Management Strategy presents a summary of the relevant legislation and policy relating to management of wastes during both demolition/construction and operational phases of any future development taken forward at Hillington Park under the SPZ.

The strategy considers the construction and demolition phases and highlights specific areas of consideration in relation to:

- Waste reduction;
- Waste storage;
- Waste transport;
- Potential use of waste management tools (e.g. site waste management plans);
- Management of contaminated materials; and
- Industry guidance and best practice.

The strategy considers the operational phase of the future development(s) and highlights specific areas of consideration in relation to:

- Waste reduction;
- Waste storage; and
- Waste transport;

For both construction/demolition and operational phases, the Waste Management Strategy identifies who will be responsible for considering the areas identified and implementing the required measures.

Checklists are appended to this Waste Management Strategy detailing the required information (which in the case of the construction phase is in the form of a Waste Management Plan) to be submitted by the Developer.

Annex A: Waste Management Checklist

Checklist 1: Construction Phase Checklist (includes demolition of existing structures, modification of existing structures and/or development of external areas).

Requirement	Required by Planning Authority	Provided by Developer	Developer Notes
Construction Phase Waste Management Plan to include the following:			
<ul style="list-style-type: none"> Demonstration that waste hierarchy has been considered 			
<ul style="list-style-type: none"> Detail of waste types, volumes and disposal/recovery routes 			
<ul style="list-style-type: none"> Demonstration that identified management plan satisfies Developer's Duty of Care 			
<ul style="list-style-type: none"> Details of waste storage areas 			
<ul style="list-style-type: none"> Details of waste transport routes 			
<ul style="list-style-type: none"> Strategy for managing contaminated materials 			
<ul style="list-style-type: none"> Reference to relevant guidelines / best practice and confirmation they have been incorporated into the Waste Management Plan 			

Checklist 2: Operational Phase.

Requirement	Party Responsible	Notes
Consideration of waste hierarchy and reduction of wastes.	Tenant	
Consideration of the types and volume of wastes to be produced and provision of appropriate waste storage areas.	Developer	
Identification and employment of appropriate waste management services by suitably qualified waste management contractors	Tenant	
Details of vehicular access provision for waste management collections	Developer	
Relevant protocols and best practice and confirmation that these have been incorporated into the design for the application	Developer	