

Site Waste Management Plan – Highover Farm, Hitchin.

This SWMP should be referred to by all construction and design teams in conjunction with documentation produced under the Construction, Design and Management Regulations 2015, such as Designer's Risk Assessments (DRA) and Pre-Construction Information (PCI) and the Construction Phase Plan (CPP) for this phase. These should be used to assess potential hazards, risks and control measures required. Reliance should not be placed solely on measures outlined in this document.

Recycling;

The Principal Contractor will appoint a suitably qualified recycling company (BIFFA) to ensure maximum waste removal from site is recycled. Barrat Redrow North Thames, aims to reduce the waste created through the design process, and then look to re-use waste produced on site. Where this isn't practicable, Barratt Redrow North Thames, aim to recycle materials, this will help reduce decrease construction site traffic to the area.

All waste removal will be monitored and recorded, and the data will be used to identify areas where we can improve recycling and divert more refuse away from landfill sites. All removal will be in accordance with the Site Waste Management Plan (SWMP).

Waste Champion;

Barratt Redrow will appoint a suitably qualified recycling company (BIFFA) to ensure maximum waste removal from site is recycled. A waste champion will also be appointed on site who will ensure, through tool box talks and during the site induction, that the importance of recycling correctly is well understood by all subcontractors. The site team will also visually inspect the site perimeter to ensure no waste has escaped the site or the surrounding area. All waste removal will be monitored and recorded, and the data will be used to identify areas where we can improve recycling and divert more refuse away from landfill sites.

Audit Trail;

One of the aims of a SWMP is to reduce the potential for illegal disposal of construction waste by keeping a full audit trail of waste removed from the site. The SWMPs produced for site will contain details of the waste contractors used and information on the appropriately licensed facility to which waste has been taken.

No Burning on Site;

There will be no burning on-site (including waste, materials, undergrowth or other vegetation or refuse) throughout the course of the development (both during construction and site preparation works). This restriction is in place in order to protect the environment as well as to safeguard the amenities of occupiers of existing properties within the vicinity of the application site, and site staff.

Estimating Waste;

The waste generated from these works will be:

- WM3 cart of soils from site
- Concrete and brick (from roads, drainage works)
- Plastic (from drainage and mains utilities)
- Asphalt (from roads)
- Plaster Board
- Timber
- Cardboard and Plastic
- Lightweight active waste (electric cables, insulation, Polystyrene)
- Food Waste
- Hazardous waste (Paint/Mastic)
-

The table below shows the overall divisional waste production last year. These waste types will be tracked for actual production for each site and will be recorded for Highover Farm

<u>Divisional Waste Production Report</u>				
	Divisional Buildable Area	388,338.00	Sqft	
	Divisional Buildable Area	36,077.82	m2	
		T/100m2 (Div)	Tonnes Produced Total (Div)	Actual Produced (Highover Farm)
17 02 01	Mixed Wood	0.88	317	
17 09 04	Mixed Construction Waste	0.98	354	
17 08 02	Plasterboard	0.85	307	
15 01 06	Mixed Packaging waste	0.07	25	
	TOTAL	2.78	1,003	
Landfill Diversion was at 100% last year				

The volumes generated from these items will be noted by the Contractor as they finalise the SWMP in line with the requirements of this document prior to commencement.

All soils leaving site will be surplus only after the cut/fill balance has been maximised on site.
Concrete and brick will be recycled into 6F2 and or subbase for private drives.

Asphalt will be used in compound car parks, private drives where possible.

Space for Later Recordings;

The Contractor's SWMP will have space within it to:

- Record actual figures against the estimated figures
- Record and identification of those responsible for removing the waste from site and details of the sites they will be taking it to
- Record explanations for any deviations from what has been set out in the SWMP, including explanations for differences in actual waste arisings compared to the estimates

OCCUPATIONAL SAFETY, HEALTH AND ENVIRONMENTAL PROCESSES AND PROCEDURES MANUAL (PPM)

BARRATT REDROW STANDARD (BRS)

29 WASTE MANAGEMENT



Version Control	Date
V3.2	April 2025

Approval and sign-off	Name	Confirmation & date
Sponsor	Steven Boyes, Chief Operating Officer	01.04.2025
Owner	Vince Coyle, Group Construction, and SHE Director	01.04.2025
Author	Steve Wilson, Group Waste Manager	01.04.2025

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Introduction and Scope

1.1 Introduction

Barratt Redrow plc (the Group) is fully committed to achieving high standards of health, safety and welfare, always creating a safe working environment.

This document sets out the Group's processes and procedures for Safety, Health and Environmental (SHE). It must be read in conjunction with the SHE policy document.

The SHE policy is denoted at the start of the section to which it relates by the exclamation mark symbol and text noting what must be complied with, for example:



The SHE Policy states:

The policy statement(s) are noted thus.

This policy provides the narrative as to 'what' must be complied with, within the business and the control around the policy refers to 'how' the policy is to be complied with through these procedures; the control elements are denoted by the tick symbol and text, for example:



The Primary SHE Control states:

The control for the policy is noted thus.

Additionally, where the SHE PPM has a close relationship to other departmental policies and procedures, these are referenced by the warning symbol and text, for example:



The SHE Relationship states:

Reference should be made to the following procedure documents.

The Group Construction and SHE Director (or Delegate of Authority where appropriate) is responsible for ensuring that all SHE team members have access to and comply with this information, providing:

- A reference point in the event of any query on policy or procedure
- A standard and consistent operating procedure across the Barratt Redrow Group
- An auditable trail of process to enable the Group to inspect the SHE operation and carry out checks on a Division's efficiency and compliance
- Best practice across the Group, by being subject to review and the adoption of regular updates to capture continuing improvements within the business.

It is vitally important that all members of the SHE team are fully conversant with these policies and procedures. The adoption of compliance with and ongoing review of these policies and procedures will support the department in achieving its objectives.

By following these policies and procedures Divisions will be able to self-audit their processes, this will be backed-up by Group audits on a regular basis for compliance.

1.2 Scope of the SHE Barratt Redrow Standards that must be followed

This document covers:

- Waste management.

2. SHE Policy and Controls

The SHE Policy states:



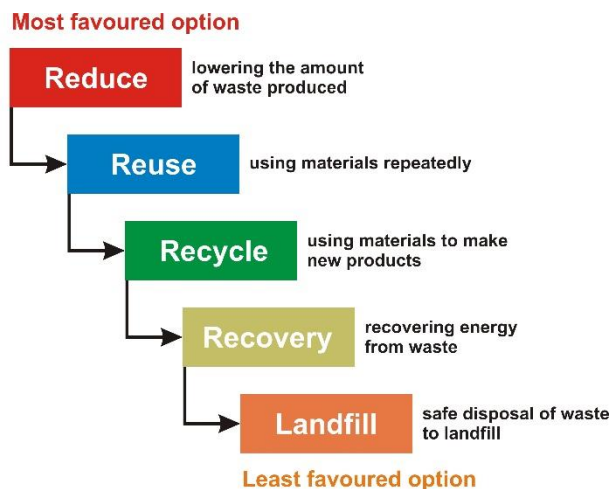
- A review of all opportunities for waste minimisation via the Group procurement process must be undertaken for all suppliers and each challenged to reduce waste through the construction process.
- All waste disposal companies used must be permitted or licensed by the EA, NRW and SEPA respectively. In England and Wales, they will be covered by an Environmental Permit or an Exemption and in Scotland they will be covered by a WML or an Exemption.

The Primary SHE Controls are:



- All sites must have appropriate colour coded signage for each waste stream. Tipper skips to be labelled with appropriate waste stickers to ensure segregation at source. Segregation / compound area to have appropriate signage to ensure the area is clearly visible.
- All sites to ensure contractors adhere to the segregation at source instruction utilising tipper skips/bins to eliminate cross contamination of waste streams.
- Divisional Construction Director/Manager and Commercial Director to meet with the Waste Management Provider to discuss and improve waste management.
- Site Manager must perform periodic reviews to ensure that waste from site is being handled correctly and transferred to the final point of disposal or recovery as detailed on the SWMP and as per waste transfer note/Consignment note.

3. Waste Management

		Reference	Responsibility
1.0	Introduction		
1.1	This Barratt Redrow Standard details the Waste Management policy and procedures. The policy and procedures reflect the company's commitment to waste management as part of our overall Environmental policy.		Managing Director/ Operations Director
1.2	We are committed to: Adopting embed Circular Economy principals (outlined in Appendix 2 – Circular Economy), including a life-cycle approach towards design and specification, to reduce waste generated through design activities. Purchase environmentally preferable products and increase the proportion of recycled materials used to build houses/apartments, wherever possible and within budgetary limitations. Work with manufacturers and the supply chain to achieve material optimisation through design choices and material selection.		
1.3	We are committed to improving resource efficiency by reducing material use and waste generated from our activities. Our aim is to reduce the life cycle impact of materials and wastes and reduce emissions that may contribute to climate change. Our approach to overall resource management is based on the following hierarchy: Most favoured option  <pre> graph TD A[Reduce] --> B[Reuse] B --> C[Recycle] C --> D[Recovery] D --> E[Landfill] </pre> Least favoured option • Prevention or minimisation of waste through the design process • Use of materials efficiently to reduce waste		

		Reference	Responsibility
	• Implementation of robust waste management practices on all our sites and offices • Maximisation of on-site recovery (Reuse, recycling or treatment) • Minimisation of disposal of waste to landfill • Segregate waste streams to enable materials to be recycled or reused • Regularly collecting data and monitoring our performance using Key Performance Indicators.		
1.4	In addition, we are committed to raising awareness of resource efficiency and waste management across the Group and within our supply chain. This will include training and information to employees, contractors and suppliers on waste minimisation opportunities and resource efficiency		
2.0	Definitions		
2.1	Construction Waste Construction waste is defined as materials or substances created as a by-product of the above-ground construction process that must be removed from the construction site and disposed of via either landfill or an alternative disposal route. Currently not included in Construction Waste Definition: • Materials from the demolition of existing buildings on our developments where managed and controlled by a specialist contractor employed as Principal Contractor • Pallets removed from site by our nominated licenced carrier which are repatriated with the suppliers, refurbished for re-use or materials recycled • Materials from customer appointed/managed fit out works including Carpets/Curtains/Wardrobes/Interior Design • Any uncontrolled fly tipping which we are required to manage on our owned land • Any domestic waste generated by customers moving into their new homes • Waste generated from the Sales area • Waste from completed developments (Customer Care Works) • Waste arising from our site Welfare Areas • Waste from Offices • Waste arising from legacy work carried out under the Building Safety Act 2022 • Waste arising from the presentation and maintenance of stock plots.		

		Reference	Responsibility
2.2	Diversion from landfill The Group defines “Diversion from landfill” as above-ground construction waste (as defined in 2.1) with a final disposal route other than landfill. The term ‘diversion from landfill’ is <u>NOT</u> to be used interchangeably with ‘recycled’. Diversion from landfill encompasses many disposal routes, of which recycling is only one • Specific inclusions: waste composted, incinerated for energy, destroyed through mass burn, recycled or repurposed. Include waste re-used where it has first been removed from site via a waste contractor. • Specific exclusions: all landfill waste. Re-use items where the material or tool has been re-used on site or collected by the initial suppliers for the purpose of re-use (including pallet collection schemes).		
2.3	Tonnage Waste is measured by its mass in tonnes. “Tonnage” refers to the overall mass of waste, as distinct from “waste intensity” or a percentage figure, for example as used when describing a percentage of waste diverted from landfill.		
2.4	Legally completed area The legally completed build area includes all habitable areas of a building and multiple floors where applicable. It excludes outside areas such as patios, garden areas, parking and garages, sheds and other external storage areas. It excludes communal area such as landings and shared hallways. It excludes the floor area of commercial premises including those constructed by Wilson Bowden Developments. The legally completed build areas shall be provided by Group Finance in the format of total legally completed square foot area per division for the reporting period required. The area in square feet shall be converted to square metres by applying a conversion factor: the area shall be multiplied by 0.092903 to give the area in square metres.		
2.5	House build equivalent area “House build equivalent area” or “house build equivalents” may be reported upon for internal use only. This metric differs from legally completed build area reported on publicly through its inclusion of partially constructed home build area estimated according to stages in the build process.		

		Reference	Responsibility
2.6	Controlled Waste – Any waste arising from the site which the holder discards, intends or is required to discard.		
2.7	Hazardous Waste – Waste that has hazardous properties that may be harmful to human health or the environment. (See section 11)		
2.8	Inert Waste – Is solid waste that is physically, chemically and biologically stable from further degradation over time and considered to be nonreactive. Examples include, rubble, concrete, bricks, blocks, tiles, ceramics soil, sand and gravel.		
2.9	Active Waste – Is waste that will biodegrade over time and includes wood, plastic, metal and vegetation.		
2.10	Waste Carrier – Person/Company with licence to transport waste (must hold a valid waste carriers licence issued by the EA/NRW/SEPA).		
2.11	Waste Transfer Note (WTN) is a document that accompanies the transfer of non-hazardous waste between different holders.		
2.12	Consignment Note – A controlled document for the movement of hazardous/special waste.		
2.13	Absolute Hazardous Waste – these wastes are defined as hazardous in the EWC and no further work is required to define what the chemicals or substances are.		
2.14	Mirror Hazardous Waste – these wastes may be hazardous depending on whether it contains dangerous substances at or above certain action levels.		
2.15	European Waste Catalogue (EWC)/List of wastes – These are a list of wastes that have been categorised as hazardous or non-hazardous and have a distinct 6-digit reference code.		
2.16	Waste Management Hierarchy The hierarchy for waste management which must be applied to transferring any waste through prevention, preparing for reuse, recycling or recovery.		
2.17	Waste Minimisation - Design Includes a range of methods to 'design-out' waste from a business and limit waste arising's from its activities		

		Reference	Responsibility
2.18	Waste Management Involves identifying potential waste streams and managing these to ensure efficient disposal.	<u>SHE Form 05</u>	Construction Director / Commercial Director
2.19	Divisional Waste Champions All Divisions must appoint a Divisional Waste Champion from within both of their Commercial and Construction functions, who will act as the day-to-day divisional waste management leads.		
3.0	Waste Minimisation - Supply		
3.1	A review of all opportunities for waste minimisation via the Group procurement process must be undertaken for all suppliers and each challenged to reduce waste through the construction process. This will include considering how materials are being delivered to site and evaluating if packaging is appropriate to prevent damage and is not excessive which creates unnecessary waste.		Group Procurement/ Buyers
3.2	All developments must consider opportunities to minimise waste through the design stage and consider how any design changes can impact on reworking or wasted materials. Consideration must be given to the use of construction processes that will reduce the amount of waste created.		Group Technical/ Construction Directors
3.3	All developments must identify the location of on-site storage of materials and ensure that they are appropriate to prevent damage to materials. Delivery of materials must be planned and coordinated so that they can be handled appropriately on site and stored in an appropriate location.		Construction Director
4.0	Divisional / Group Offices Waste Management		Office Manager
4.1	All offices within the Group must have waste management processes in place which enable waste to be managed, and these will include: - Maximise the use of electronic media for dissemination of information both internally and externally. Ensure these are designed to facilitate them being read on-screen and avoid the need for printing. - Ensure that printing/copying equipment provides double-sided prints and set this up as the default option for photocopiers and computers		

		Reference	Responsibility																														
	- Print release scheme (where the user has to formally 'pull' their printing to a specific printer); this will reduce wastage of printing that is not collected. - Put in place a segregation and recycling strategy for the following: - Paper - Cardboard - Printer and toner cartridges - Plastic cups - Metal drinks cans - Food - Batteries - Electrical Equipment For our offices located in Wales, refer to section 5.2.1																																
5.0	Waste Management on Construction Sites																																
5.1	<table><tr><th>Waste Stream</th><th>Colour Code</th><th>Container Type / Size</th></tr><tr><td>Mixed Waste</td><td>Red</td><td>See note below*</td></tr><tr><td>Inert Waste</td><td>Green</td><td>Stockpile*** (Clearly signed)</td></tr><tr><td>Plasterboard</td><td>Blue</td><td>8, 12, 14 yd skip ****</td></tr><tr><td>Light Weight Compactable</td><td>Orange</td><td>12-14 yd skip**</td></tr><tr><td>Hazardous</td><td>Purple / Black</td><td>Haz Waste Station</td></tr><tr><td>Wood</td><td>Yellow</td><td>12-14 yd skip</td></tr><tr><td>Metal</td><td>Brown</td><td></td></tr><tr><td>Mixed Recycling</td><td>Based on supplier</td><td>8 yd FEL or 1100L bins</td></tr><tr><td>Food Waste</td><td>Based on supplier</td><td>120/140L bin</td></tr></table> *Mixed waste skips must not be provided on site unless they form part of a waste management process linked to a licensed waste transfer / handling station or to remove waste materials at the end of the construction period on site No Roll on Roll Off (ROROs) to be used on any development unless authorised in advance by the Group Waste Manager due to the potential for contamination and reduced ability to monitor excess waste. *** Skips or Roll on Roll Off must not be used unless Director level sign off is agreed in advance **** Plasterboard should only be removed via a Group approved route	Waste Stream	Colour Code	Container Type / Size	Mixed Waste	Red	See note below*	Inert Waste	Green	Stockpile*** (Clearly signed)	Plasterboard	Blue	8, 12, 14 yd skip ****	Light Weight Compactable	Orange	12-14 yd skip**	Hazardous	Purple / Black	Haz Waste Station	Wood	Yellow	12-14 yd skip	Metal	Brown		Mixed Recycling	Based on supplier	8 yd FEL or 1100L bins	Food Waste	Based on supplier	120/140L bin		Contracts Manager/ Project Director/ Area Construction Manager
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		Appendix 1 4.2																															

		Reference	Responsibility
5.1.1	Rain adds to the density of waste therefore during inclement weather, skips must be covered with a proprietary cover, as a minimum overnight. Where consistency of supplied skips dimensions allows the group approved design for a lift of scaffold frame should be used to suspend the cover.	Docushare	Construction / Project Director
5.1.2	No waste removal via any route other than Group appointed Waste Contractors is permitted without the prior approval of the Group Waste Manager or Group Construction and SHE Director.		Construction / Project Director
5.2	On Site Recycling All sites in England and Scotland must segregate Dry Mixed Recycling waste streams from other waste and collection for offsite recycling by a Group approved Waste Management Contractor. Materials that are currently accepted within our mixed recycling service/containers: • Paper (non-confidential) • Cardboard packaging • Card (includes protective flooring) • Metals (food/drink cans and tins) • Empty Plastic drink bottles, food tubs/trays • Predominately clear LDPE plastic packaging (material wraps) In addition to the above Food Waste (no minimum amount) must be disposed of and collected separately from all other waste streams for offsite recycling by a Group approved Waste Management Contractor. This requirement excludes Scotland.		Construction / Project Director
5.2.1	WORKPLACE RECYCLING - WALES ONLY All locations (Offices and Developments) must have a separate collection for offsite recycling by a Group approved Waste Management Contractor. of the following single source segregated items: • Food (for locations that produce more than 5kg of food waste per week) • Card & Paper (Cardboard packaging, protective card floor covering, non-confidential paper) • Metal & Plastic (Empty – food/drink cans and tins, Plastic drink bottles, food tubs/trays)		Office Manager (Offices) Construction / Project Director (Developments)
5.3	All sites must have appropriate colour coded signage for each waste stream. Tipper skips to be labelled with appropriate waste stickers to ensure segregation at source. Segregation / compound area to have appropriate		Site Manager

		Reference	Responsibility
	signage to ensure the area is clearly visible. Signage warning against Fly Tipping and unauthorised usage must also be prominently displayed including at the entrance to site.		
5.4	All sites to ensure contractors adhere to the segregation at source instruction utilising tipper skips/bins/plot bags to eliminate cross contamination of waste streams.		Site Manager
5.5	All sites must appoint a designated waste champion for ensuring segregation and management of waste is taking place.		Site Manager
5.6	All sites must have a process in place to capture, store and promote the reuse of off-cuts e.g. Noggin/Dwang box and useable plasterboard off-cuts.		Site Manager
5.7	The Waste Information and guidance wall that includes the Ten Steps to Waste Reduction poster, Best Practice examples and KPI performance (which should be updated monthly) in or adjacent to the Health and Safety hub.		Site Manager
5.7.1	Requirement for waste management to be included at the site-specific induction and where available (Biffa, Ecoefficiency and Reconomy serviced Divisions only) The Video Toolbox Talk (Waste Management) should be utilised to support this, and the video should also be used to support addressing repeated failing to adhere to the correct segregation. https://vimeo.com/778604147/43aa4dbe15 Reconomy and Ecoefficiency Serviced Divisions (excluding London) https://vimeo.com/851339504/41104866a6?share=copy Biffa Serviced Divisions		Site Manager
5.8	Where segregation is not practicable on site then segregation at a waste transfer/handling station via licensed waste carrier must be undertaken (NB: These sites must be permitted under either an Environmental Permit/Waste Management Licence or an exemption where appropriate).		Contracts Manager/ Project Director
5.9	Pallets including Green Pallet Loop pallets must not be placed into skips and the Group “take back” scheme must be used. Pallets must be stored on suitable ground, in a signed, designated area and stacked (safe and stable, and where possible with similar sized pallets) no more than 15 high.	Docushare (standard signage catalogue)	Site Manager

		Reference	Responsibility
5.9.1	Divisional Construction Director or Head of Construction and Commercial Director and Divisional Waste Champions to meet on at least on a bi-monthly basis with the Waste Management Provider. Divisions that are above their tonnes per 100m ² waste intensity target or identified by the Group Waste Manager as a Division that requires additional support and focus should continue monthly.		Construction Director / Commercial Director
5.9.2	Review meetings should also be held by Divisional Waste Champions with the Group Pallet “take back” provider these review meetings should be held as a minimum quarterly with more frequent reviews required for those Divisions returned less than 50% of their estimated pallets on site number. Annual reviews Pallet reviews should also be held with Construction and Commercial directors.		Construction Director / Commercial Director
5.9.3	Site Management must accompany the Waste Management Contractor on Waste Audits to review performance against the waste policy and segregation performance		Site Manager
5.9.4	The Waste Management Provider is to be contacted to conduct toolbox talks regarding waste management and segregation best practice on all new developments with follow up toolbox talks as required.		Site Manager
6.0	Registration as Producer of Hazardous Waste		
6.1	All developments in Wales must be registered with Natural Resources Wales (NRW) prior to any works commencing as potential producers of hazardous waste. Registration must be renewed annually. A unique registration code will be issued, which must be displayed in the site offices. (Not a requirement in England and Scotland).		Technical Director/Site Manager
7.0	Waste Carriers Licence		
7.1	All contractors removing waste from site must hold a valid Waste Carriers Licence (WCL) which must always be available on site. A matrix of carriers provided by one of our approved brokers is acceptable. This includes WCL for any sub-contractors removing waste from site and also contractors removing soil, portable toilet waste and road sweepings.		Technical Director
8.0	Environmental Permits - England and Wales/Waste Management Licensing (WML) - Scotland		
8.1	All waste disposal companies used must be permitted or licensed by the EA, NRW and SEPA respectively. In England and Wales, they will be covered by an Environmental Permit or an Exemption and in Scotland they will be covered by a WML or an Exemption.		Technical Director

		Reference	Responsibility
8.2	An Environmental Permit, WML or Exemption will be required for the actual site where waste materials are treated for recycling or re-use. The following exemptions may apply where applicable: • Mobile crushers must have a Part B Permit to operate issued by the Local Authority (LA), which must be kept with the machine. The LA must be notified each time a machine is moved into their local area or to a new location. • On site concrete, bricks, tiles or other inert materials can be crushed and reused as subbase or fill. In this case a T7 Permit exemption (England and Wales) or a Paragraph 24 exemption (Scotland) can be registered. In England and Wales this is registered with the LA and in Scotland with SEPA. Specific conditions are that: a) The total quantity of waste treated over any period of 1 hour does not exceed 20 tonnes. b) The quantity of waste stored at any one time does not exceed 200 tonnes. Movement of the material to other locations will be subject to waste transfer documentation and waste carriers licensing with a full record of all movements to be maintained that includes the depositing site permit number. • Treatment or screening of soils or wastes (other than concrete, bricks or tiles) will be subject to a T5 exemption (England and Wales) but the maximum quantities that can be stored or treated is 5000 tonnes over a 3-year period. • A U1 exemption (England and Wales) should be obtained to allow use of suitable wastes for small scale construction. Example activities include: ○ Using crushed bricks, concrete, rocks and aggregate to create a noise bund around a new development and then using soil to landscape it to enable grass to grow. ○ Using road plantings and rubble to build a track, road or car park. ○ Bringing in some soil from another place for use in landscaping at a housing development.		Technical Director Technical Director Technical Director Technical Director

		Reference	Responsibility																																																
8.3	The following limits apply to any exemption: Table 1 - You can use to 5000 tonnes in total of the wastes below for any construction activity. <table><tr><th>Codes</th><th>Waste types</th></tr><tr><td>010102</td><td>Waste from mineral non-metalliferous excavation</td></tr><tr><td>010408</td><td>Waste gravel and crushed rock other than mentioned in 010407</td></tr><tr><td>010409</td><td>Waste sand and clays</td></tr><tr><td>101208</td><td>Waste ceramics, bricks, tiles and construction products (after thermal processing)</td></tr><tr><td>101314</td><td>Waste concrete and concrete sludge</td></tr><tr><td>170101</td><td>Concrete</td></tr><tr><td>170102</td><td>Bricks</td></tr><tr><td>170103</td><td>Tiles and ceramics</td></tr><tr><td>170107</td><td>Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 170106</td></tr><tr><td>191209</td><td>Minerals (for example sand and stones)</td></tr><tr><td>191212</td><td>Aggregates only</td></tr></table> Table 2 - You can use up to 1000 tonnes in total of the wastes below for construction purposes <table><tr><th>Codes</th><th>Waste types</th></tr><tr><td>170504</td><td>Soil and stones other than those mentioned in 170503</td></tr><tr><td>170506</td><td>Dredging spoil other than those mentioned in 170505</td></tr><tr><td>191302</td><td>Solid wastes from soil remediation other than those mentioned in 191301</td></tr><tr><td>200202</td><td>Soil and stones</td></tr></table> Table 3 - Within the 1000 tonnes total for use of wastes from Table 2, you can only use the waste below for the construction of tracks, paths, bridleways or car parks. The waste must be processed into chipped form prior to use. <table><tr><th>Codes</th><th>Waste types</th></tr><tr><td>170302</td><td>Bituminous mixtures other than those mentioned in 170301</td></tr><tr><td>020103</td><td>Plant tissue waste</td></tr><tr><td>030101</td><td>Waste bark, cork and wood only</td></tr></table> You can use up to 50000 tonnes in total of the wastes below only for the construction of roads. <table><tr><th>Codes</th><th>Waste types</th></tr><tr><td>170302</td><td>Bituminous mixtures other than those mentioned in 170301</td></tr><tr><td>170504</td><td>Road subbase only</td></tr></table>	Codes	Waste types	010102	Waste from mineral non-metalliferous excavation	010408	Waste gravel and crushed rock other than mentioned in 010407	010409	Waste sand and clays	101208	Waste ceramics, bricks, tiles and construction products (after thermal processing)	101314	Waste concrete and concrete sludge	170101	Concrete	170102	Bricks	170103	Tiles and ceramics	170107	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 170106	191209	Minerals (for example sand and stones)	191212	Aggregates only	Codes	Waste types	170504	Soil and stones other than those mentioned in 170503	170506	Dredging spoil other than those mentioned in 170505	191302	Solid wastes from soil remediation other than those mentioned in 191301	200202	Soil and stones	Codes	Waste types	170302	Bituminous mixtures other than those mentioned in 170301	020103	Plant tissue waste	030101	Waste bark, cork and wood only	Codes	Waste types	170302	Bituminous mixtures other than those mentioned in 170301	170504	Road subbase only		Technical Director
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010409	Waste sand and clays																																																		
101208	Waste ceramics, bricks, tiles and construction products (after thermal processing)																																																		
101314	Waste concrete and concrete sludge																																																		
170101	Concrete																																																		
170102	Bricks																																																		
170103	Tiles and ceramics																																																		
170107	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 170106																																																		
191209	Minerals (for example sand and stones)																																																		
191212	Aggregates only																																																		
Codes	Waste types																																																		
170504	Soil and stones other than those mentioned in 170503																																																		
170506	Dredging spoil other than those mentioned in 170505																																																		
191302	Solid wastes from soil remediation other than those mentioned in 191301																																																		
200202	Soil and stones																																																		
Codes	Waste types																																																		
170302	Bituminous mixtures other than those mentioned in 170301																																																		
020103	Plant tissue waste																																																		
030101	Waste bark, cork and wood only																																																		
Codes	Waste types																																																		
170302	Bituminous mixtures other than those mentioned in 170301																																																		
170504	Road subbase only																																																		

		Reference	Responsibility
8.4	A Paragraph 19 exemption (Scotland) will be required for construction materials stored or received on site as long as no more than 50000 tonnes of waste is stored on the site at any time, the waste is suitable for use on site and is not stored for more than 12 months.		Technical Director
8.5	Construction activities undertaken for the purpose of producing a suitably engineered soil would not be regarded as a waste management activity (i.e. lime stabilisation and piling) and a permit/licence would not be required. Where uncontaminated materials are produced on site during construction work and are then stored and re-used on the same site, in accordance with planning permission, there is no requirement for a Permit/WML/Exemption provided: they are suitable for that use and require no further treatment; only the quantity necessary for the works is used; and their use is not a mere possibility but a certainty.		Technical Director
8.6	Relevant activities involving uncontaminated materials produced on site and then reused on the same site may include cut and fill; simple foundation excavations with arising's spread evenly under the ground floor slab and the combination of soils to create a retaining structure.		Technical Director
8.7	On multi-phase developments, if arising's are used on site and it is done in accordance with planning permission (for the whole development) then a permit or exemption will not generally be required. This can also be the case where different developers are involved in a consortium agreement for a development and a formal agreement is in place which identifies levels of responsibility.		Technical Director
8.8	Where clean waste material is transferred from one development to another or imported from a third-party source, an exemption from a Permit/WML can be granted by the EA/NRW/SEPA respectively. These exemptions must be applied for prior to the work commencing (25 days in England and Wales and 21 days in Scotland). Where contaminated materials produced on site during construction works (including excavated soils) are used on site in accordance with the planning permission these may not be regarded as waste and a permit/license not required. (The criteria in 8.5 must still be achieved). This can include activities such as site re-grading and use of materials below cover or capping layers, buildings and hard standing.		Technical Director

		Reference	Responsibility
	In this case an assessment must be made to ensure that materials will not pose a risk to the environment. This must be detailed in a remediation strategy for the site, which meets EA/NRW/SEPA requirements.		Contracts Manager / Project Director
9.0	Duty of Care – Waste Materials		
9.1	All appropriate measures must be taken to ensure anyone who is involved in the chain of custody for waste is appropriately permitted/licensed. (Waste will include clean soil from site being deposited off site or imported clean soil to site). Where specific areas of concern arise, these should be notified to the Group Waste Manager.		Site Manager
9.2	All waste must be appropriately identified and stored on site and covered to prevent uncontrolled release. Skips must not be overfilled or allowed to overspill, and disposal areas kept clean and tidy.		Site Manager
9.3	Waste must only be transferred to an authorised person capable and permitted/licensed to deal with the type of waste produced.		Site Manager
9.4	Periodic reviews must be undertaken to review that waste from site is being handled correctly and transferred to the final point of disposal or recovery as detailed on the SWMP and as per waste transfer note/Consignment note.	See Section 10 & 11	Contracts Manager/ Project Director
9.5	Reasonable steps must be taken to ensure that sufficient site security measures are in place to prevent the illegal disposal of waste from site and illegal dumping of waste onsite.		Managing/ Commercial/ Technical Director
9.6	If Barratt Redrow are not the Principal Contractor, the pre-contract meetings and competency checks must identify waste management procedures and arrangements made by the external PC.	BRS 01 BRS 03 <u>SHE Form 19</u>	
10.0	Waste Transfer Notes (WTN)		
10.1	To enable review of Waste Transfer Notes your Waste Management Supplier should be contacted and access to their portal provided.	BRS 41	Site Manager
10.2	For repetitive transfers of non-hazardous waste, a season ticket can be utilised for up to 12 months. These can only be used where the parties involved in each transfer are the same and where the description of waste transferred remains the same.	BRS 01 <u>SHE Form 19</u>	Contracts Manager/ Project Director
10.3	All waste transfer notes must describe the quantity and types of the waste being transferred and include the appropriate waste code (EWC code) and waste	Waste Management	Site Manager

		Reference	Responsibility
	description for the waste stream. They must indicate that the hierarchy for waste control has been applied. Construction waste codes are included in Section 12.	Supplier Portal	
10.4	General descriptions such as 'general waste' or 'Inert waste' are not acceptable. It is our requirement as producers to ensure the description is accurate.		Site Manager
10.5	The waste transfer note must record how the waste is contained/packaged, when it is transferred, where it should go and whom it was transferred to i.e. waste carrier details including waste carriers' registration number.	Waste Management Supplier Portal	Site Manager
10.6	Copies of the waste transfer note(s) must be maintained for two years. These must be held at the divisional office.		
11.0	Consignment Notes (Hazardous/Special Waste)		
11.1	A consignment note is required for hazardous/special waste that is removed from site. A waste transfer note is not required where the waste is controlled by a consignment note. separate regulations apply in some instances in Scotland see: http://www.sepa.org.uk/media/36660/consigning_special_waste.pdf		Site Manager
11.2	The consignment note is a three-page document which are colour-coded: Producers/Holders/Consignor's – White Carrier's Copy – Gold Consignee's – Pink		
11.3	Parts A & B must be completed on each copy of the consignment note. A broker can complete this, but it remains Barratt Redrow PLC responsibility to ensure it is completed correctly. Part A = Holders details Part B = Description of the Waste (Including EWC code)		
11.4	All copies of the consignment note must be given to the carrier who will check parts A and B are correct. They will complete Part C – Carriers Certificate and will return the form to the producer for completion of Part D – Consignor's certificate.		
11.5	On completion of Part D retain the White copy of the note and return the other copies to the carrier.		
11.6	Copies of Consignment notes must be retained for 3 years.		

		Reference	Responsibility
11.7	Where contractors as part of their work package are responsible for the removal of hazardous waste the division must satisfy themselves that appropriate systems are in place and that waste is being managed effectively.		

12.0 European Waste Catalogue / List of Wastes

Non-Hazardous Waste Types	Waste Description	EWC Code
Asphalt	Bituminous mixtures	17 03 02
Canteen waste (Food)	Biodegradable kitchen and canteen waste	20 01 08
Contaminated bund waters	Aqueous liquid wastes containing non-dangerous substances	16 10 02
Dry mixed recycling (mixed packaging)	Mixed packaging	15 01 06
Inert	Mixed concrete, bricks, tiles and ceramics	17 01 07
Metallic packaging (tins, cans, packaging)	Metallic Packaging	15 01 04
Municipal waste/general waste	Mixed municipal waste	20 03 01
Packaging (plastic)	Plastic packaging	15 01 02
Paper and cardboard	Paper and cardboard	15 01 01
Plasterboard	Gypsum / Plasterboard	17 08 02
Road sweeper waste	Sweeper Waste	20 03 03
Sanitary waste	Sanitary Waste	20 01 99
Scrap metal (from construction and demolition)	Scrap metal (from construction and demolition)	17 04 07
Sewage waste for cess tank (including sludge)	Septic tank sludge	20 03 04
Soil and stone (not contaminated)	Soil and stone (not containing hazardous substances)	17 05 04
Waste concrete (from construction)	Concrete	17 01 01
Wood waste (from construction and demolition)	Scrap wood (arising from construction and demolition)	17 02 01

Hazardous Waste Types * denotes Hazardous Waste	Waste Description	EWC Code
Absorbents contaminated with hazardous substances (e.g., oily rags, used spill kits)	Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances, nappy pads.	15 02 02*
Aerosols	Gases in pressure containers (including halons) containing hazardous substances	16 05 04*
Batteries	Batteries (including lead, Ni-Cd, mercury, and alkaline containing batteries) and other unsorted batteries and accumulators	20 01 33*
Expanding Foam	Gases in pressure containers (including halons) containing hazardous substances	16 05 04*
Fluorescent tubes	Fluorescent tubes	20 01 21*
Hydraulic oil	Hydraulic oil and hydraulic oil containing PCBs	13 01 01*
Insulating oil	Insulating oil	13 03 07*
Interceptor sludge	Interceptor Sludge	13 05 03*
Mastic, Sealants and Adhesives	Adhesives and sealants containing organic solvents or other hazardous substances	08 04 09*
Packaging containing residues or contaminated by hazardous substances	e.g., empty aerosols, drums, paint tins, packaging	15 01 10*
Oil contaminated bund waters	Aqueous liquid wastes containing dangerous substances	16 10 01*
Soil and stone (contaminated)	Soil and stone containing hazardous substances	17 05 03*

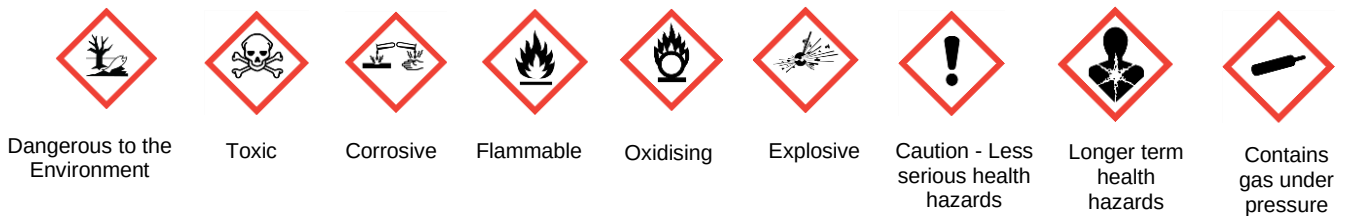
13.0 Timber Waste Treatment and Reuse

Although our waste timber is not currently classified as hazardous in nature, the varied levels of treatment no matter how nominal applied to all timber products would result in classification of our waste timber waste as treated.

Following a comprehensive review, chipping/shredding of our timber waste to reduce it in size, mass or volume for onward transport is not permitted as this process would require a T6 exemption and a T6 specifically states Untreated Timber. Additionally, the use of chipped/shredded treated timber derived from waste on site for paths and tracks however temporary is not permitted on our developments.

14.0 Other Potentially Hazardous Waste

Where products carry the following hazard warning symbols, they will be deemed hazardous and may require special means of disposal. There are other substances, which will be deemed hazardous, but these are the most common found on our sites.



14.1 Disposal of hazardous Waste

All developments must have a facility for managing hazardous waste. Disposal of products into these facilities must be strictly controlled. All hazardous waste must be transferred to a licensed carrier using a consignment note to track its movement.

14.2 Paint Tins or Tubs

Paint tins or tubs may be classified as hazardous waste.

All sites **must** use the paint can/tub recycling service provided by the approved supplier where practicable. All cans or tubs being recycled must contain no more than 25mm of wet paint and have lids securely fastened. Dry tubs or cans will not need to have lids on.

Redrow – Painting Contractor to return to Crown, Brewers or Rabart Decorating Centres quoting the originating sites H-Code.

Barratt/David Wilson – Painting Contractor to return to Dulux Decorating Centre quoting the originating sites H-Code

Alternatively.

If requested, The Dulux Decorator centre will pick up the empty cans when they make deliveries of new paint to the site.

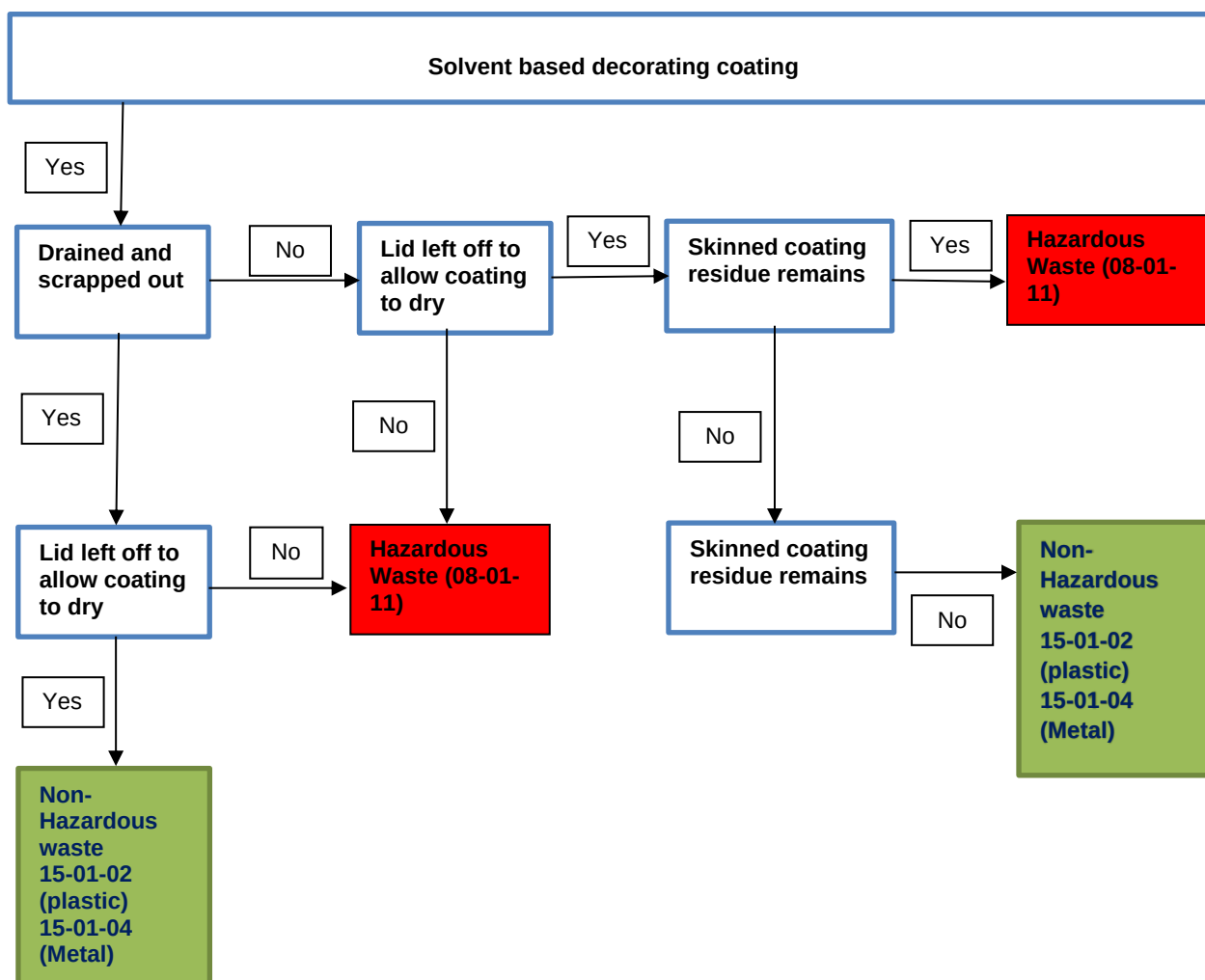
Dulux will provide bags for recycled cans as follows:

- Blue for water based
- Red for solvent based

If the onsite collection option is to be utilised a dedicated storage area clearly signed must be in operation.

Solvent Based Paint Cans or Tubs

For solvent based paint or woodcare coatings, the containers which are not recycled as detailed above may be classified as hazardous. The chart below can be used to determine whether the empty or partially emptied containers are classified as hazardous or non-hazardous.



Water Based Paint Cans or Tubs

In the case of water-based paint containers, all the waste will be non-hazardous provided the contents are drained/scrapped and the lid is left off to completely dry off residue. The same waste codes will apply for non-hazardous waste packaging as above.

14.3 Mastic Tubes

Non-Hazardous Mastic Tubes can be disposed of via LMC/LWC Skips. Seek guidance from your Divisional Buyer if in doubt over the hazardous nature of the mastic or refer to the Material Safety Data Sheet for the product.

Mastic tubes displaying hazardous warning labels, must be fully discharged to remove any residue. If there is any residue in the nozzle or any other part of the tube and is not removed prior to disposal, the tube will be classified as hazardous. Nozzles should be removed and any section of the tube with mastic remaining cut away and treated as hazardous waste. The remainder of the tube can be disposed of as non-hazardous waste.

14.4 Resin Tins or Aerosols

Part used resin tins and aerosols displaying one of the hazardous warning signs must be treated as hazardous even if empty.

14.5 Waste Electrical Electronic Equipment (WEEE)

Under the WEEE directive we must ensure we dispose of our **Waste Electrical and Electronic Equipment** in the most environmentally friendly and compliant way.

The WEEE directive requires all waste of this type including everything from fridges, kettles to televisions are stored, collected and disposed of separately to other waste streams. Your Waste Management partner will advise you of the most appropriate and complaint solution for any waste of this nature that may arise or be unlawfully disposed of on our sites.

14.6 Fly Tipping

Our developments should always display prohibition signage that warns against fly tipping and ensure every effort is made to actively prevent occurrences.

We do however recognise that fly tipping can be an issue in and around our sites, and as a responsible house builder we understandably take action to clean up any such instances.

A separate removal of such waste can be arranged via our Group Waste Suppliers (and be excluded from construction waste submissions), **provided such approval has been sort and granted by the Group Waste Manager and requests will require supporting photographic evidence.**

14.7 Non-Construction Waste Skips

Waste not included within our Construction Waste definition (Section 2.1) may be classified as Non-Construction Waste and a skip provided for the sole purpose of removal of this waste.

Removal of such waste can be arranged via our Group Waste Suppliers (and be excluded from construction waste submissions), **provided such approval has been sort and granted by the Group Waste Manager and requests will require supporting photographic evidence.**

14.8 Soft Furnishings – Persistent organic pollutants (POPs) (Fly tipped/Site Office)

The Environment Agency (EA) have provided an update regarding waste items that could contain Persistent organic pollutants (POPs) and specific guidance has been issued for **soft furnishings including sofas, armchairs, futons, cushions and padded chairs.**

If it is not known explicitly if the soft furnishings do not contain POPs, then it must be assumed that they do and therefore any items of this nature that are fly tipped on Barratt Redrow land must not be co-mingled with other wastes.

Your Waste Management partner will advise you of the most appropriate and compliant solution for any waste of this nature that may arise or be unlawfully disposed of on our sites.

14.9 Groundworkers Waste

Groundworker Skip contents must be representative of Groundworker activity, this includes items not limited to insulation offcuts, packaging, pipe offcuts etc. etc. Waste arising from Barratt Redrow above ground construction is not permitted within these skips. Skips should be inspected periodically by the Site Management team to ensure correct usage.

All Groundworker skips should be located away from the Site Waste Compound, within or near to the Groundworkers compound and always signage stating Groundworkers Waste Only should be clearly displayed.

Where Groundworkers waste is persistently contaminating Barratt Redrow construction waste streams, Groundworkers should have dedicated tipper skips that are clearly signed Groundworkers Waste Only.

15.0 Road Sweepings

Guidance on Road Sweeping and permitted disposal options can be found in the BRS 28 – Environmental Protection [Policies & Procedures Manual](#)

16.0 Guidance on content of Waste Transfer Notes

Section A - This must contain sufficient information about the waste to enable anybody coming into contact with it, to handle it safely. The description should be in words and by using the appropriate EWC code. It is not acceptable to use non-specific terms such as 'General waste'. It is also important to ensure the quantity and how the waste will be contained is detailed.

Section A - Description of the Waste

Please describe the type of waste below;

Please give the six figure European Waste Catalogue (EWC code)

Total Quantity of waste to be collected

Describe how it is contained i.e. loose or packaged

Section B – This must have details of the site and address where the waste has been produced. This must be signed by an authorised person i.e. site manager

Section B – Waste Producer

Name:

Address

Post Code

Signature:

Section C – This must include the name and address of the company collecting the waste including their waste registration number and be signed by the authorised person i.e. driver

Section C – Person or Company collecting the Waste

Name:

Address

Post Code

Registration Number:

Signature:

Section D – The location where the waste will be deposited must be detailed including the date and time of transfer. The name of the waste broker should also be included.

Section D – Location of disposal/Transfer

Address of place of transfer/collection point

Date of transfer

Time of transfer

Waste Broker who arranged the transfer

The waste management hierarchy has been applied to this waste transfer and consideration given to reusing or recycling waste before transferring it.

Appendix 1 - Waste Data Reporting Process Guide

1. Introduction

1.1. Objective

This manual sets out the policies and procedures for construction waste reporting for Barratt Redrow and its subsidiary companies (together referred to as 'the Group').

1.2. Waste Policies and Procedures



- **The Barratt Redrow Standard on Waste Management (BRS 29)** details the Group policy for operational waste management on-site. These reflect the Group's commitment to waste management as part of our Group Sustainability Policy.
- This document – **Waste Data Reporting Process Guide** – defines the Group's standards for waste data collection and reporting. This data and reporting process underpins the Waste Strategy outlined above.

1.3. Policy

- This manual is written to demonstrate the scope and method for the Group's inclusion of construction waste metrics in its public reporting, including in the Annual Report and Accounts and PLC website (www.barrattdevelopments.co.uk). Data collected is also used to assess operational performance, for investor benchmarks, in Group and divisional socio-economic footprints and for stakeholder engagement.
- Unless otherwise stated, compliance with the Waste Data Reporting Process Guide is mandatory for all waste contractors and divisions supplying the Group with data on construction waste.
- The Policy applies to all joint ventures in which the Group holds an interest where a member of the Group is an acting principal contractor unless the Group Commercial Director has agreed a specific amendment for a joint venture.
- Any exceptions **MUST** be agreed in writing by the Group Commercial Director in advance.
- This manual provides a single point of reference to define and standardise Group construction waste reporting policies and practices. It also provides a tool for spreading best practice across the Group.
- The manual is not intended to act as guidance to waste management practices on site. The Group's Waste Management Standards are included in the Barratt Redrow Standards (BRS) 29.

1.4. Procedures

- It is the responsibility of the Group Commercial Director to ensure that all records are maintained in accordance with this Guide.
- Any exceptions or agreements to vary from these policies must be authorised by the Group Commercial Director.
- Where authorisation is required from a specified individual, that individual may provide that authorisation via email provided that the documents being authorised are attached in the email chain for reference and for audit purposes.

2. Policy

2.1. Objective

The data collected on construction waste forms an important part in improving operational efficiency, and in external reporting against targets that the Group has made public. It must therefore be consistent, accurate and supported by appropriate documentary evidence.

2.2. Policy

- This data forms the basis for reporting at the end and half of the financial year. The Barratt Redrow half year is from the 1 July to 31 December. The full year is from 1 July to 30 June.
- All amounts must relate to waste collected from our sites during, or as at the date of, the reporting period. For example, waste data MUST relate to waste removed from site for disposal or recycling during the reporting period (which is not necessarily the same as the amount invoiced or paid in cash in the period).
- Exact figures must be taken from the weighed construction waste taken away from site for disposal by the approved waste management contractor. Estimates are not acceptable unless under exceptional circumstances. The methodology used to calculate any estimates and the basis for such calculations must be documented, reviewed and approved by the Group Commercial Director, and available for audit as required.
- If further information is necessary to provide a true and fair view or to explain significant changes between reporting periods, such information should be collected and saved in the evidence pack.
- Data must be collected by divisions monthly as per the waste strategy. The data for each month must be returned to Group Commercial on the 19th of the following month for verification (or the next working day where this falls on a weekend or public or business holiday). All data should be checked carefully by the division before submission to Group Commercial.
- Documentation supporting the collection of data must be retained by each division in accordance with the Group's policies and be capable of being produced as evidence for audit purposes. Examples of this include waste transfer notes, correspondence, emails, summaries and any calculations or conversions made by the suppliers.
- The collection of data and the basis for any estimates (if applicable) must be reviewed and approved by the Group Commercial Director and the Group Construction and SHE Director, for inclusion in the Group's public reporting.

3. Corporate reporting scope

Barratt Redrow waste collection data includes waste from all residential and mixed construction sites where Barratt Redrow is the principal/main contractor.

It **excludes** joint ventures where Barratt Redrow is not the principal/ main contractor; Wilson Bowden Developments; the normal domestic waste created by customers when they move into their homes which is collected by local authority contractors.

It **includes** construction sites where Barratt Redrow is a principal/main contractor and where sub-contractors are undertaking construction activities.

4. Data collection process

4.1. Auditable collection receipts

All construction waste removed from site must be weighed by the waste contractor and a Waste Transfer Note (WTN) provided. In addition to any information provided for legal compliance purposes, WTN must include information on:

- Waste contractor company name
- Size of skip collected
- Waste stream collected (this should align with waste streams identified in section 6)

Repeat transfers can be streamlined with less manual paperwork by using a WTN season ticket. A season ticket **covers many transfers for up to 12 months**. A season ticket can be used if all the below stays the same:

- Both the waste producer and the waste carrier or waste collection business
- The type of waste and description of the waste being transferred
- The locations where the waste is being moved from and to

If any of the above changes during the 12 months, a new WTN will be required, and the season ticket will be void.

An annual waste transfer note is a single note that covers many transfers throughout up to a year. An annual waste transfer note is just another term for a Waste Transfer Note Season Ticket.

You must keep a separate list of the date and amount of waste transferred under an annual note. This done by your waste contractor noting each transfer on a spreadsheet or reporting portal.

With both individual and annual WTNs we will require the waste contractor to consolidate this information for subsequent reporting (0).

4.2. Other waste

Plasterboard Waste must be removed by Barratt Redrow via A via a Group Approved Waste Management Contractor or via controlled route to British Gypsum (BG) where BG provide Barratt Redrow with verification of the volumes of received plasterboard.

If this waste is not disposed of or weighed by a Group Waste Contractor, it must be reported separately by the Division.

Groundworkers waste (skips)

Construction waste is defined as materials or substances created as a by-product of the above-ground construction process that must be removed from the construction site and disposed of via either landfill or an alternative disposal route.

We have set out and included a requirement in the trade specs for all Groundworkers to supply monthly data relating to removal of waste in skips.

Where sites have no provision within the Ground works package for skips and have now sited a skip specifically designated as Groundworkers waste on their sites, these must be identifiable in the Group Approved Waste Management Contractors - monthly reports to enable exclusion from the Divisional submissions

Groundworkers excavated materials

We have set out and included a requirement in the trade specs for all Groundworkers to supply monthly data relating to removal of excavated materials from sites.

Groundworkers report their waste weight/volume data, and this not included in Divisional submissions.

Monthly consolidation

The waste management companies must consolidate the waste collection receipts into a spreadsheet or waste data portal system showing granularity of waste stream type, housebuilding divisions and the tonnages disposed to landfill, tonnages diverted from landfill and tonnages recycled, reused. Divisional commercial teams are required to use the portal/report provided by the waste management companies and use to populate the "Waste Submission Sheet" Excel template with cumulative YTD data at the site level, which should then be sent to Group Commercial by no later than 5 working days after receipt of the waste tonnage data from your respective Divisional Waste

Construction waste not included in the above must also be collated by divisional teams and populated in the "Waste Submission Sheet" Excel template. This may include other wastes as identified in section 4.2 above and the waste stream must align with those identified in section 6.1. This shall be subject to audit of any calculation and waste collection receipts by Group Commercial if required.

4.3. Validation process

Divisional Commercial and Construction teams are responsible for querying and checking any data before sending to Group Commercial. This should be undertaken on at least a monthly basis. Checks should include checking waste acceptance notes and ensuring arithmetical checks are made on any summaries of data.

Group Commercial will query a sample of data received both from the divisions and from the waste contractors.

Specific checks relating to waste at all levels include:

- Interrogation of submissions recording abnormally high or low volumes of waste.
- Significant percentage changes in waste streams recorded from one reporting period to the next.
- Misalignment between the direction of travel for waste data as submitted and unit completions during the reporting period.
- Cross checking a list of sites submitting waste data with a Group Finance/TM1 record of build active construction sites.
- Cross checking construction waste tonnage to waste management company portals/reports.

- Cross checking submitted legal completions, legally completed area and house build equivalent area against TM1 / Group Finance values.
- Investigating reasons for unusual period-on-period variances.

The legally completed build area with figures held by Group Finance on the TM1 system as per the definition.

The Group Commercial Director will conduct a high-level review of the data spreadsheet for sign-off.

The Waste Reduction Group will also discuss data trends, performance against corporate KPIs, and waste-stream or divisional anomalies at the half year and end year time periods as per the waste strategy.

5. Monitoring and compliance

5.1. SHE Monitoring Visits

Operational waste management procedures including the correct segregation of waste and correct licensing and permits for waste disposal can be found within the Barratt Redrow Standards on waste (BRS 29). Compliance and monitoring of these procedures at the operational level are found within the Barratt Redrow Standards on Monitoring, Reporting and Auditing of Safety, Health & Environmental Standards (BRS 06).

5.2. Forward Through Quality (FTQ) Director Visits

Additional checks on operational waste management are conducted through the Forward Through Quality Process (FTQ), with monthly site visits carried out by a minimum of three Divisional Directors. More information can be found within Construction Processes, Procedures and Guidance, Section 2.03.

5.3. Self-certification through the Commercial Action Group auditing checklist

A development checklist has been produced by the Commercial Action Group, and this list includes recommended waste management practices. Compliance with the checklist is not monitored but action taken against the checklist impacts on findings from SHE and FTQ visits.

5.4. External assurance

Waste intensity by legally completed area (tonnes/100m²), waste intensity by house build equivalent area (tonnes/100m²), and diversion from landfill (%) is to be externally assured on an annual basis.

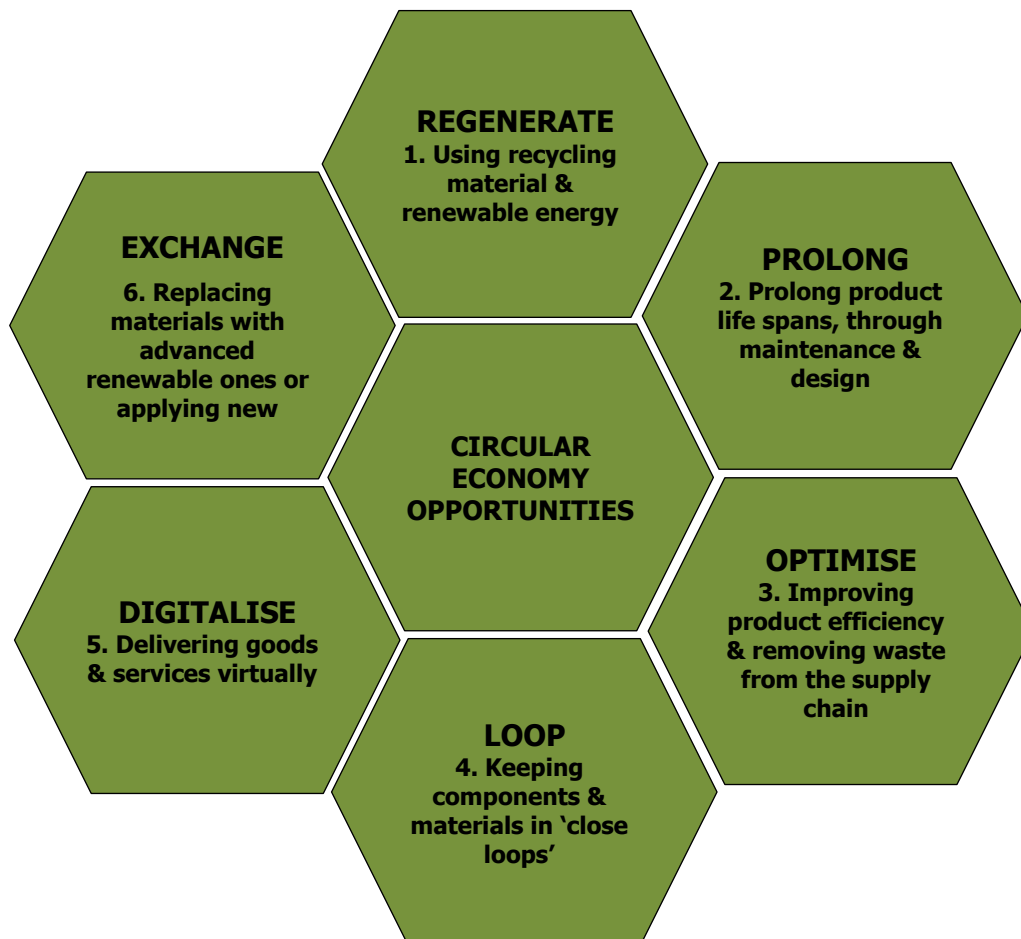
6. Waste stream key

6.1. Terminology for waste streams

Across different companies, waste segregated into different skips can be provided different terms though in reality the waste stream is the same. For clarity, the table below acts as a key relating to the waste data discussed.

Barratt Redrow PLC term	Waste Contractor
Lightweight Compactable	Light / Mixed Compactable – Construction & Demolition
Inert	Inert – Brick & Block
Plasterboard	Plaster & Gypsum based
Hazardous	Hazardous
Wood	Timber – Wood Waste
Metal	Mixed Metal
Mixed Packaging	Dry Mixed Recycling
Canteen Waste	Food
Other	General / other

Appendix 2 – Circular Economy



Appendix 3 – Material Reuse/Waste Flow Chart

