# Site Waste Management Plans

Planning Advice Note June 2018



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### Forward

If you are applying for planning permission for development which involves any of the following, you need to prepare a Site Waste Management Plan to submit with your planning application, and it will be necessary to provide information to the Development and Planning Authority (DPA) on completion of the development. The submission of this further information will be a condition on the planning permission should the application be approved;

- Development of five or more dwellings;
- Any development with a minimum floorspace over 1,000 square metres;
- Any development that involves the demolition and redevelopment of a redundant building;
- Any development which involves the demolition and redevelopment of a dwelling which has planning permission to be subdivided;
- A replacement dwelling on a one for one basis.

The key objectives of any Site Waste Management Plan should be to:

- Minimise the amount of waste generated as part of the project;
- Maximise the amount of material which is sent for reuse, recycling or reprocessing (i.e. promote the waste hierarchy); and
- Minimise the amount of material sent to landfill.

Site Waste Management Plans apply to all aspects of construction work associated with qualifying applications, including preparatory enabling works such as demolition, excavation and site clearance. In fact, the majority of opportunities for waste minimisation exist at the design phase of a development.

This Planning Advice Note provides further advice on the requirement for a Site Waste Management Plan for certain proposals, in the Policies of the Island Development Plan (IDP) and Policy GP9: Sustainable Development.

Please note: Following the publication of the States' Waste Management Plan which is a Plan relating to management of the disposal and recovery of waste on the whole Island, to avoid confusion, Waste Management Plans as named in the IDP, will be referred to as Site Waste Management Plans within this document.

# 1. Introduction

**1.1.** A Site Waste Management Plan is a framework which details the amount and type of waste that will be produced on a construction site and how it will be minimised, reused, recycled on and off the site and how the remaining waste will be disposed of, in order to ensure that appropriate environmental management practices are followed during the demolition and construction phases of development. The amount of information required for a Site Waste Management Plan will be proportionate to the type and scale of development.

**1.2.** There is a finite amount of the Earth's resources and sustainability and climate change mitigation is essential in meeting the needs of the present whilst safeguarding the interests of future generations. This approach is part of the States' Waste Strategy, centred around the waste hierarchy as set out below;



**1.3.** The purpose of producing a Site Waste Management Plan is to prevent waste at the early stages of design and to reuse, recycle and recover materials where possible, with disposal the least preferred option. The outcomes from Site Waste Management Plans will provide valuable information so that the States of Guernsey can monitor what happens to waste and what barriers there are to waste minimisation, as well as informing the Island's need for waste disposal in the future.

**1.4.** In order to fulfil the requirements set out in the IDP a detailed breakdown of materials and estimated waste needs to be provided, along with details of how waste will be minimised at all stages of the project. This guidance note explains the requirements for a Site Waste Management Plan and what you have to do at each stage. Appendix 1 contains forms which may be completed and submitted with your planning application.

**1.5.** Without prejudice to the consideration of a planning application, if completed these forms will fulfil the requirements for the submission of a planning application in respect of the requirement for a Site Waste Management Plan, however it is acceptable to produce a different Site Waste Management Plan should you wish to do so providing that it contains the required information. Appendix 2 contains forms to be completed during construction and upon completion and which should be submitted to the DPA post completion to allow the waste resulting from the development to be monitored and assessed.

# 2. How to Satisfy the Requirements for a Site Waste Management Plan

**2.1.** The IDP requires a Site Waste Management Plan to be submitted with qualifying applications, as set out on page 3. This section details how to prepare Site Waste Management Plans to meet the requirements set out within the IDP.

**2.2.** Site Waste Management Plans are intended to be an integral part of a project and should be considered at the earliest stages of the design and development process and implemented throughout the construction phase.

**2.3.** A Site Waste Management Plan is submitted in two sections. The first section provides details of how it is intended to manage and minimise waste before construction commences and during construction and is submitted with your planning application. Where the development is of a larger scale or is likely to result in significant amounts of waste you will need to update the Site Waste Management Plan as the details of the development progress and to submit these to the DPA prior to commencement of works. This additional stage will not be required for small scale developments such as replacement dwellings on a one for one basis. The second section of the Site Waste Management Plan is to be submitted within 3 months of a development's completion date and will be required by a condition of your planning approval.

**2.4.** Section 1 of a Site Waste Management Plan should include information on waste management goals for the project as well as how these goals will be implemented. This includes how it is anticipated that waste associated with the development process is to be minimised, how existing materials are to be reused on or off site and how the remaining waste will be dealt with.

**2.5.** Section 2 of a Site Waste Management Plan is submitted post completion which should contain more detailed information on actual material quantity and how it was

reused/recycled/disposed of during the development as well as evaluation of the project as a whole in regards to waste minimisation. A Site Waste Management Plan is intended to be a living document to be re-evaluated throughout the construction phase so as to inform the details in section 2 of the submission.

**2.6.** There are two appendices within this Planning Advice Note which consist of a series of forms which once completed, contain all of the information required for a Site Waste Management Plan. The forms in the appendices of this documents are there to help, however it is acceptable to produce a different Site Waste Management Plan should you wish to do so, providing that it includes all of the required information captured in the forms.

**2.7.** The forms contained in Appendix 1:For Submission with a Planning Application, satisfy the requirements of section 1 of a Site Waste Management Plan and are as follows:

- Outline of Project;
- Waste Management Goals;
- Estimated Material Quantity;
- Proposed Action Checklist.

**2.8.** The forms contained in Appendix 2: During Construction and Post Completion satisfy the requirements of section 2 of a Site Waste Management Plan and are as follows:

- Material Quantity;
- Waste Evaluation;
- During Construction and Post Completion Evaluation Checklist and Reflection

**2.9.** A proportionate approach will be taken regarding the level of detail provided at both stages of the Site Waste Management Plan depending on the scale and type of development. For smaller developments such as the replacement of a dwelling on a one for one basis which generally will not give rise to significant amounts of waste the information on designing out waste and waste management goals in section one and the final waste figures to be submitted in section 2 will be expected to be site specific but high level. For larger developments or where a development will result in significant amounts of waste the Site Waste Management Plan is expected to provide detailed information that is site specific and post completion submissions should provide specific information regarding all waste and how and where it was prevented, reused, recycled, recovered or disposed of.

Please note you will need to keep a copy of all forms submitted at the planning application stage in order to complete section 2 of the Site Waste Management Plan.

**2.10.** Please note that if measures to minimise waste set out in the Site Waste Management Plan include works on the site, for example stone crushing, the site activities must not cause a statutory nuisance in relation to noise, vibration, dust, odour etc. In order to ensure the successful implementation of a Site Waste Management Plan, it is important to seek the advice of the Office of Environmental Health and Pollution Regulation, (OEHPR), about any planned works which could potentially cause a disturbance to nearby residents and users. Your Site Waste Management Plan should be site-specific, taking into account constraints and opportunities for waste management, including the impacts of what you want to do on surrounding uses. Should complaints be received by the OEHPR, an assessment of nuisance will take place using a proportionate and holistic approach on a case-by-case basis.

# 3. Options for Minimising Waste

**3.1.** Waste minimisation involves regularly challenging design and construction decisions and it is something which must be continually revisited and re-evaluated throughout a development. Central to waste minimisation is communication and calculating how each team member or stakeholder can help reduce waste at each stage.

**3.2.** Pages 14-16 contain baseline and 'good' wastage figures for a number of materials which can be used to help when considering waste minimisation for your Site Waste Management Plan. This information is from the WRAP Net Waste Tool Reference Guide, an independent registered charity that is committed to creating sustainable environments.

#### Communication

Communication is central to waste minimisation and all those involved in a development can contribute, either directly or indirectly by means of support. The waste potentially generated by a development must be considered at the earliest stages of a design and development process and throughout the construction phase and everyone involved in the development at each stage must be alive to the potential for waste minimisation.

#### **Design Phase**

The design phase is an essential part of waste minimisation. Examples of steps which could be included in a Site Waste Management Plan are as follows:

- Developing a design which will help reduce waste;
- Designers can incorporate the reuse of existing materials on site or recycled materials into the design, such as the opportunity for the reuse of the materials of an existing structure or the use of products and materials with good levels of recycled content;

- Design with the life cycle of products and materials in mind;
- Use dimensions which suit standard material sizes;
- Flexible approach to design;
- Consider 'design freezes' in order to avoid making changes to designs that are already approved and where construction has commenced;
- The use of Building Information Modelling (BIM), to accurately calculate materials required.

#### Procurement

- Explore possible opportunities for the use of prefabricated elements where suitable;
- Ensuring an appropriate and accurate waste allowance to avoid over ordering;
- Encourage takeback, recycling or elimination of packaging.

#### Logistics

- Appropriate storing and handling of materials in order to prevent materials being damaged;
- 'Just-in-time delivery': Having materials delivered to site only at the point they are required for installation, thus avoiding unused material being damaged whilst being stored on site;
- Ensuring efficient site management in order to prevent contamination of waste and maximise the reuse and recycling of materials.

### 4. Benefits of Waste Management

4.1. Using a Site Waste Management Plan is a way of protecting the Earth's and Guernsey's finite resources whilst also encouraging a more cohesive and considered approach to development. Benefits of a Site Waste Management Plan include:
4.2. A reduction in costs:

- Reducing the amount of waste materials will reduce the cost of disposal;
- Understanding what materials are being over-ordered will reduce purchasing costs;
- Transport costs will be lowered when volumes of waste are reduced;
- Re-using existing waste materials on site will cut costs.

<sup>1</sup> Building information Modelling (BIM) is a way of designing collaboratively in an integrated system, it is a shared resource which can be used throughout different stages of a project and is widely recognised as best practice.

- **4.3.** Reducing your environmental footprint:
- Divert waste from landfill and protect land resources;
- Reduce pollution and carbon emissions;
- Help conserve natural resources by reusing materials on site.
- 4.4. Reduce on-site risks:
- Decrease the chance of injuries due to waste left or stored on site;
- Improve the visual impact of development for the surrounding community.
- 4.5. Positive endorsement for your business;
- The opportunity to promote and advertise your business' waste reduction and sustainable approach and opportunity to make a submission for the Keep Guernsey Green Award.

# 5. Estimating Quantities of Construction Waste

Pre- Construction (section 1)

**5.1.** It is possible to calculate expected wastage from materials. This may be based on your experience of average waste from previous projects you have worked on or know about or information from a manufacturer. In order to assist with the calculation of waste, pages 14-16 contain a table which details expected baseline wastage and 'good' wastage. This table can be used to assist you to calculate your predicted waste. This is from the WRAP Net Waste Tool Reference Guide, an independent registered charity that is committed to creating sustainable environments.

#### During Construction and Post- Completion (section 2)

**5.2.** In order to demonstrate the success of your efforts, record what and how much waste has been reduced. Regular updates can increase motivation of staff and ensure targets are being met.

**5.3.** In order to measure and record waste minimisation, re-use and recycling:

• Quantify all materials used in the development;

- Compare the data to the amount of waste that would have been produced if normal ordering margins had been used (use previous experience if necessary);
- Estimate the amount of waste that is avoided, reduced and reused on site and record this in section 2 of the Site Waste Management Plan;
- The data must be collected in the form of invoices/receipts received from the recycling facility at the point of material drop off for each load and from suppliers of materials;
- The quantity of waste must all be recorded as one standard measurement (eg tonnes);
- Spreadsheets can be a useful way of storing live information before being inputted into the forms provided or your own Site Waste Management Plan.

#### How to calculate recycling rates:

5.4. In order to measure the recycling rate by weight, this formula can be used<sub>2</sub>:
 Where R= Material recycled (Tonnes)
 Where W= Total material collected in tonnes (for both waste and recycling)

Recycling Rate (%) = <u>R (tonnes)</u> x 100 W (tonnes)

R and W should be calculated over the same time period and should include all waste streams.

**5.5.** To ensure that the data collated is robust and credible, it should be recorded at a pace suitable for the development, at least every month, and needs to contain:

- The total waste and recycling (in tonnes) deposited at a recycling centre or landfill;
- The total waste (in tonnes) reused on the site;
- The total waste (in tonnes) recycled or reused other than on site or at a recycling centre;
- A summary of total waste and recycling (in tonnes) collected.

2 (Recycling rate is material recycled (tonnes) divided by the total material then times that number by 100)

#### Recycling Facilities in Guernsey

Site	Materials
<b>Guernsey Recycling</b> Bulwer Avenue St Sampson GY2 4LQ	Ferrous & Non-ferrous scrap metal Vehicles Batteries (Lead acid) Electric Cable Electrical Items
<b>Island Waste</b> Pointes Lane St Andrews GY6 8UJ	Mixed non-putrescible Mixed inert construction waste Rigid Plastics
Longue Hougue St Sampson	Inert waste (Uncontaminated) Glass (Plate) Ceramics Soil mixed with turf
<b>Mayside Recycling</b> Bridge Avenue Vale GY3 5TB	Cardboard Paper Plastic Bottles Clear Polythene & Bubble Wrap
<b>Mont Cuet</b> Vale	Non-recyclable waste, including plasterboard, putrescible waste, plastic paint containers, etc. Wood Green Waste Bonded Asbestos
<b>Ronez Ltd</b> Les Monmains Vale GY3 5TZ	Recyclable stone/rubble
Scrap-IT / Sarnia Recycling Fontaine Vinery St Sampsons	uPVC Windows/Doors Non-ferrous scrap metal Batteries (Lead acid) Pallets
States Works La Hure Mare Vale GY3 5UD	Polystyrene
Vaudin Stonemasons Fontaine Vinery	Reusable stone/granite
Wastenot PO Box 77 St Peter Port GY1 4BN	Batteries (household & Lead acid) Ferrous & Non-ferrous scrap metal Fluorescent Tubes/Low energy Light Bulbs

An up-to-date list of recycling and disposal routes for businesses including contact details can be found at www.gov.gg/recycling

#### **Estimated Material Waste**

This table is an extract from WRAP Net Waste Tool Reference Guide, and more information can be found here: www.wrap.org.uk. This table contains predicted waste generated for a material. This list is not exhaustive and you may need to gather wastage information for materials not listed.

Material	Baseline	Good	Notes
Aggregates	10%	5%	
All IT FF&E	1%	0%	
Balcony Components	1%	0.00%	
(excluding Glazing)			
Boarding	23%	5%	
Bricks and Blocks	20%	Bricks 10% Blocks 5%	
Cementitous Sprays	10%	5.00%	
Ceramic Sanitary	3%	1.00%	
Fixtures and Fittings			
Composite/	1%	0%	
Rainscreen Cladding			
and Panelling			
Concrete In-Situ	5%	2.50%	
Demountable	3%	2%	
Partitions			
Door Ironmongery	1%	0%	
Doors, Windows,	5%	2.50%	
Glazing, Security			
Screens and Curtain			
Walling			
Ethylene Tetra Fluro	1%	0%	
Ethylene (ETFE) Roof			
System, Texlon Foil			
Cushion System or			
Similar			
Fabric Covered	15.50%	5.55%	
Framed Panelling			
Ferrous Metal	15%	5%	
Glass	5%	2.50%	
Granite/Marble Wall	3%	1%	
Cladding			
Gravel	10%	5.50%	
Gypsum Products	5%	2.50%	
Insulation	15%	5%	Including; Cement,
			Mortar, Plaster and
			Render

#### **Estimated Material Waste**

Material	Baseline	Good	Notes
Large Pre-Cast	1%	0%	
Concrete Elements			
Lead and Zinc	7.50%	2.50%	
Flashings			
Monobloc Partitions	1%	0%	
Non-Ferrous Metal	5%	2.50%	
Other Inert (e.g.	10%	5%	
Soils and Excavation			
Waste			
Packaging (Paper,	100%	100%	
Cardboard, Plastic)			
Piling	1%	0%	
Plasterboard	22.50%	15%	
Plastic	5%	2%	
Polyolefine Roofing	15%	5%	
system, Derbigum,			
Mailey or Similar			
Pre-Cast Beam and	14%	4%	
Block			
Processed Timber	10%	5%	
Revolving Doors	3%	1%	
Roll Soft Flooring	20%	10%	
Sand	12.50%	5.50%	
Screed	5%	2.50%	
Sliding/Folding	1%	0%	
Partitions			
Small Pre-	3%	2%	
Cast Concrete			
Components			
Stairs	3%	1%	
Steel Splashbacks	1%	0%	
Steel Stud	3%	2%	
Components			
Stone	10%	5%	
Structural and	1%	0%	
Roofing Frames			

#### **Estimated Material Waste**

Material	Baseline	Good	Notes
Structural	15%	5%	
Waterproofing			
Surfacing materials	5%	2.50%	Including Damp-
			Course Membranes
			and Roofing
			Materials (mastic
			asphalt, polymers
			and bitumen)
Tiled Cladding	8%	5%	Including Asphalt,
			Bitumen and
			Macadam
Tiled- Soft Flooring	5%	2%	
Tiles and Ceramics	8%	5%	
Unprocessed Timber	10%	5%	
Wall and Floor Units	1%	0%	
WEEE and Services	1%	0%	
M&E			
Wooden Pallets	20%	20%	

# Appendix 1: For Submission with a Planning Application.

Completing the forms within Appendix 1 would provide sufficient information for section 1 of a Site Waste Management Plan

#### Section 1A: Outline of Project

Please complete this form for submission with a planning application: Note that sections with \* are to be filled in if known at the time of application. For larger developments or developments giving rise to significant amounts of waste this form will also need to be updated and submitted to the Authority prior to the commencement of work on site. Site Address:

Reference Number:

Buildings and other structures currently on site (if any):

Brief description of proposal (Commercial, Residential, Single Family, Multi-Family, New Construction, Addition/Alteration, Repair):

Estimated Start Date:

Estimated Completion Date:

\*Principal Contractor:

\*Waste transport licence contractor (submit copy of license):

\*Subcontractors Involved:

\*Responsible site manager:

The client and principal contractor will take all reasonable steps to ensure that: All waste from the site is dealt with in accordance with 'The Environmental Pollution (Guernsey) (Amendment) Law, 2015'; materials will be handled efficiently and waste managed appropriately in accordance with any subsequently approved detailed Site Waste Management Plan; waste will be minimised, reduced, reused or recycled and disposal will be used as a last resort; following the commencement of works, all waste management actions and transactions are regularly and accurately recorded and the Site Waste Management Plan is updated as often as necessary to reflect upon realised waste figures versus estimated waste figures as detailed in the Site Waste Management Plan; and section 2 of the Site Waste Management Plan will be submitted to the Authority no later than 3 months post project completion.

Signature of Client

Signature of Principal Contractor/Agent

### Section 1B: Waste Management Goals

Please decide on a minimum of 5 waste management goals and detail how these will be achieved.

Waste Management Goal	How to Achieve
Example: Reduce Aggregate waste to 5%	Order only what is needed and for just in time
rather than 10% which is the baseline for	delivery: ensure contractors accurately assess
this material	how much is needed to reduce surplus

#### Section 1C: Estimated Material Quantity

Please complete the questions and the table of Estimated Material Quantity

How will materials be stored on site for reuse and recycling? e.g. in skip bins.

How will site operations be managed to ensure minimal waste creation and maximum reuse and recycling? e.g. Staff training, feedback from waste management service provider, ongoing checks by site supervisors, separate area set aside for sorted wastes, clear signage for waste areas etc.

How will this plan be evaluated, and who is responsible for the evaluation? e.g. evaluated by owner/site manager/ principal contractor.

#### Section 1D: Proposed Action Checklist

Please complete this form in detail in order to demonstrate how the Waste Management Plan will be implemented and how waste is to be managed effectively.

Project Stage	Questions	$\checkmark$	Notes/Comments
Internal Planning	Has a waste management plan been agreed within the project team?		
	Have the subcontractors agreed the plan?		
	Has the design of the development considered reusing any existing materials on site?		
	Has consideration been given to the use of recycled materials?		
	Can unwanted packaging be returned to the supplier to be reused or recycled or be recycled on site?		
Design and Site Management	Can unused materials be returned to the supplier or used on another job?		
	Has responsibility for waste management planning and compliance with environmental legislation been communicated to all staff and identified subcontractors?		
	Have you identified possible waste at different stages of the process?		

### Section 1D: Proposed Action Checklist

Project Stage	Questions	$\checkmark$	Notes/Comments
	Have measures been put in place to deal with hazardous waste?		
Design and Site Management	Have you researched disposal costs for separated waste that may have commercial value?		
	Have inductions been planned for all site personnel about waste management on site?		
	Has a person been identified to evaluate the Site Waste Management Plan at the end of the project?		

## Appendix 2: For Submission Post Completion

Accurately completing the forms within Appendix 2 would provide sufficient information to discharge a planning condition requiring the submission of the site Waste Management Plan section 2.

The forms within Appendix 2, once completed would provide a comprehensive overview of a development in terms of the management of waste. These forms should be completed during construction as well as post project completion and submitted to the Authority in order to fulfil the requirements of Policy GP9 of the Island Development Plan and the condition of your planning permission relating to the Site Waste Management Plan.

#### Section 2A: Material Quantity

Listed are the top 6 most wasted materials. Please fill in all the materials used as well as the total volume wasted and how this waste material was reused/ recycled/disposed of.

	Total of	Total Waste	Rei	use		Recycle		Disposal	
	Material	Volume (m <sup>3</sup> )/Area							
	Volume (m³)/Area	$(m^2)/Weight(t)$	Volume (m³)/Area	(m ²)/ Weight (t)	Estimated Volume	(m³)/Area (m ²)/	Weight (t)	Estimated Volume	
	(m ²)/ Weight (t)							(m³)/Area (m ²)/ Weight (t)	
			Reused on-	Reused off-	Recycled for	Recycled for	Sent to	Sent to landfill/	Specify the
			site	site	use on-site	use off-site	recycling facility	transfer station	contractor
	• •	* Use a sta	ndard measure	of either volume	e or area or weig	ht throughout	this template	• •	
Asphalt & Tar									
Bricks									
Concrete									
Gypsum									
Packaging									
Timber									
Other:									

### Section 2A: Material Quantity

Total of material	Total waste	Reused on- site	Reused off- site	Recycled for use on-site	Recycled for use off site	Sent to recycling facility	Sent to landfill/ transfer station	Specify the contractor Used

#### Section 2B: Waste Evaluation

Please complete this form to compare predicted waste targets and actual waste with an explanation if there is a large variance between estimations and final figures.

Material	Total Estimated Waste	Actual	Estimated not in Landfill	Actual not in Landfill	Reason for Variation

# Section 2C: During Construction & Post Completion Checklist and Reflection

Please complete the table below during construction and post completion, in order to assess the success of the Site Waste Management Plan.

Project Stage	Questions	$\checkmark$	Notes/Comments
On Site	Has responsibility for waste management been assigned to a named individual regularly on site?		
	Are selected waste materials being separated to allow best value to be obtained from recycling waste management practices?		
Post Completion	Are containers/bins clearly labelled to avoid confusion and contamination?		
	During operations have you monitored that waste is being disposed of correctly?		
	Reflect on any experiences whilst implementing a waste management programme.		
	Has a final report on use of recycled materials, waste reduction and separation been identified and completed?		
	Have key waste management successes been considered for action at future projects?		

# Section 2C: During Construction and Post Completion Checklist and Reflection

Project Stage	Questions	$\checkmark$	Notes/Comments
Post Completion	Reflect on the success of the Waste Management Plan		

**Contact Us** for further information and advice at: Planning Service, Sir Charles Frossard House, St Peter Port. GY1 1FH Telephone 01481 717200 Email planning@gov.gg

**Have you visited our website?** Go to www.gov.gg/planningandbuilding or https://www.gov.gg/recycling for additional guidance material and other information.

This Planning Advice Note is issued by the Development & Planning Authority to assist understanding of the provisions of the Island Development Plan (2016) and, where applicable, relevant legislation, by offering detailed guidance but is not intended to be exhaustive or a substitute for the full text of legislation or the policies within the Island Development Plan (2016). This Planning Advice Note does not form part of the Island Development Plan (2016). It represents the Development & Planning Authority's interpretation of certain provisions of States of Guernsey policy or legislation. The guidance is merely indicative of the Development & Planning Authority's likely approach to development proposals in relation to Site waste management plans and is not binding on the Development and Planning Authority. This Planning Advice Note does not prejudice the Development & Planning Authority's discretion to decide any particular case differently according to its merits and it does not relieve the Development & Planning Authority of any obligation, restriction or liability imposed by or under the Land Planning and Development (Guernsey) Law, 2005. Copies of the text of the Island Development Plan (2016) are available from Sir Charles Frossard House and also available electronically online at www. gov.gg/planningpolicy. Copies of legislation are available from the Greffe. Electronic copies are also available at www.guernseylegalresources.gg. Substantive queries concerning the guidance or a specific site should be addressed to the Planning Service by telephone on 717200 or by emailing planning@gov.gg. The Development & Planning Authority does not accept any liability for loss or expense arising out of the provision of, or reliance on, any advice given. You are recommended to seek advice from an independent professional advisor where appropriate.