



WASTE MANAGEMENT PLAN

In support of a proposed development for the Erection of extensions to industrial unit, construct second means of access, reconfigured service yard and parking, landscaping and ancillary works

Units 47 and 48 Clywedog Road North, Wrexham Industrial Estate LL13 9XN

On behalf of Dragon Packaging Limited

NOVEMBER 2022

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1 INTRODUCTION

- 1.1 This Waste Management Plan (“WMP”) has been prepared by Plan Red and FI Real Estate Management Ltd on behalf of Dragon Packaging Limited, which operates from Units 47 and 48 Clywedog Road North.
- 1.2 Dragon Packaging specialises in the production and distribution of thermoformed packaging for food and non-food manufacturers. On site production facilities create the thermoformed packaging to order to customers which are then stored and distributed from the warehouse.
- 1.3 The proposal for the two extensions to northwest and southeast side elevations will provide additional warehouse facilities for storage and distribution. Comparison of existing and proposed floorspace is provide in the table below:

	Existing Premises	Proposed Premises	Difference
Offices (2 floors)	390 m ²	390 m ²	0 m ²
Warehouse / Manufacturing	1,569 m ²	1,569 m ²	0 m ²
Warehouse NW extension	-	848 m ²	+848 m ²
Warehouse SE extension	-	848 m ²	+ 848 m ²
Total floorspace	1,959 m²	3,655 m²	+ 1,696 m²

- 1.4 The existing warehouse is considered to be in a mixed B2 manufacturing / B8 warehouse use; the proposed extensions will be for B8 warehouse use only. The overall extended unit will still be in a mixed use but the ratio of floorspace will change from an approximately 50/50 split to 25/75 split between Use Classes B2/B8. Ancillary office space will be unchanged.
- 1.5 The WMP sets out the waste management in connection with the existing and proposed use.

2 PROPOSED DEVELOPMENT

- 2.1 Specifics of the layout and design of the proposed development are described in the planning statement by Plan Red and the application drawings and Design and Access Statement (“DAS”) prepared by MCAU.

Main components / floorspace

- 2.2 The two extensions will be built to either side of the existing units, effectively doubling the floorspace of the future combined unit.

	Existing Premises	Proposed Premises	Difference
Offices (2 floors) (Ancillary use)	390 m ²	390 m ²	0 m ²
Warehouse / Manufacturing (Class B2/B8 use)	1,569 m ²	1,569 m ²	0 m ²
Warehouse NW extension (Class B8 use)	-	848 m ²	+848 m ²
Warehouse SE extension (Class B8 use)	-	848 m ²	+ 848 m ²
Total floorspace	1,959 m²	3,655 m²	+ 1,696 m²

Use

- 2.3 As the extensions will be to extend the storage and distribution facilities to support the existing operations the ratio of B2/B8 mix of uses will change from approximately 50/50 to a ratio closer to 25/75 in favour of B8 use but will still remain as a mixed use manufacturing and warehouse / distribution.

Access and servicing

- 2.4 The proposed service yard will be extended to front to the new building width. The existing car park to northwest will be reconfigured onto the new yard perimeter. Existing access / egress to Clywedog Road North will be retained, supplemented by new egress to southeast onto Clywedog Road South to improve internal circulation for HGVs.

3 WASTE HIERARCHY

General principles for Management & minimisation of waste

- 3.1 The management of waste on site during both the construction and operational phases will adhere to the principles set out in the Waste Hierarchy. Guidance on this is set out in The Guidance on Applying the Waste Hierarchy (January 2012) produced by the Welsh Government.
- 3.2 Relevant guidance and advice on dealing with waste as set out in the above document will be applied to the project and for each waste stream the opportunities for prevention, reuse, recycling and recovery will be identified and targets will be set accordingly.

Waste Prevention

- 3.3 Minimising waste production is the simplest way of reducing the need for waste treatment and disposal requirements from the site. Appropriate measures will be applied to prevent the generation of waste.

Waste Reuse

- 3.4 Reuse will enhance the life of a waste and means it does not need to be treated. Waste will be used instead of virgin materials where suitable. Re-use is separate to the process of recycling.

Recycling

- 3.5 The process of recycling involves the conversion of a waste into a new product or raw material. Wastes are sorted, cleaned and processed to produce a product or raw material that can be used in either the original or in a new process. Value will be added to the product or raw material as it can be used in place of virgin materials in developments or sold.

Other Recovery

- 3.6 There are a number of other recovery options focussing on the production of energy. Wastes treatment processes available for different wastes include anaerobic digestion (organic matter), incineration with energy recovery, gasification and pyrolysis (organic matter and plastic). These processes produce energy from the waste (fuels, heat and power).



Disposal

- 3.7 It is possible that some materials may not be fit for reuse/recycling and because of this will need to be removed from site to appropriately permitted landfill facility.
- 3.8 There are three types of landfill:
- Inert Waste – suitable wastes include sub-soil, concrete, bricks, asphalt, glass and stones.
 - Non-Hazardous landfill – suitable wastes include metal, plastic, topsoil, insulation, packaging, timber, (plaster may also be landfilled but in a discrete cell away from degradable materials).
 - Hazardous landfill – suitable wastes include solvent based paints, contaminated soil, contaminated concrete, treated timber, solvent products.

4 CONSTRUCTION WASTE MANAGEMENT

4.1 This section has been prepared for Dragon Packaging Limited by FI Construction on its behalf. Responsibility for construction phase waste management will be to the appointed contractor.

4.2 The following principles will be adhered to in the construction phase:

Waste Prevention

- Only the required amount of raw materials will be purchased and used within construction.
- A just in time system and will be employed, meaning that only the required amount of material is delivered.
- When ordering materials, the required quantities will be calculated so that only the necessary amount of material will be ordered.
- Materials brought in bulk will be used sparingly to prevent waste, with offcuts used in place of fresh material where possible.
- Excess materials will be returned to the supplier where possible. Engaging with suppliers will allow for purchasing of products that produce minimal waste, e.g. packaging, or waste that can be re-used or recycled.
- The most suitable materials will be chosen for use within the development. Waste will be considered when choosing which materials to purchase.
- Cement and other mixtures will be calculated so that the minimal amount of materials will be used without affecting the quality of the final product.
- Materials will be chosen that will produce minimal waste.
- Modern methods of construction and materials optimisation will be incorporated into the detailed design and implemented on-site to minimise waste arisings.
- Incoming construction materials will be stored in a separate location to wastes.
- The number of stockpiles will be minimised.

Reuse

- Ground works will incorporate opportunities to reuse/recycle excavated material where possible.

- Material may be incorporated back into construction as part of ground. remodelling works. This may be completed under a Materials Management Plan.
- Excavated materials will be subject to chemical analysis to confirm the degree of any contamination.
- Where excavated materials are determined to be geotechnically and chemically suitable for use, these materials will be stockpiled and reused on-site.
- A soil resource survey may need to be completed at the pre-construction phase to characterise soils and identify whether the soils are suitable for reuse.
- Materials may need to meet certain specifications prior to recovery. For example, bricks must meet necessary standards (BS 3921: Specification for Clay Bricks) if they are to be reused within construction.
- Waste exemptions or regulatory position statements may be needed for the use of waste within construction, such as for the construction of paths or walkways. Consideration will be given to building design when using materials such as timber. Timber will be sourced from sustainable sources, labelled with a certified scheme such as those from the Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC).
- Factory assembly processes such as pre-fabrication and panelising minimise waste due to the commercialised “production line” process, where repeated production to a high degree of accuracy leads to a reduction in waste.
- Offcuts and wastes in a condition suitable for reuse should take priority over virgin materials.
- Raw materials and wastes that are suitable for reuse will be segregated to avoid cross contamination with other wastes.

Recycling

- Wastes that are to be recycled will be segregated to prevent cross contamination.
- An appropriate exemption or permit will be sought for any onsite treatment, such as crushing or screening activities.
- Raw materials such as concrete, brick, plastics and insulation will incorporate recycled materials where possible. This will minimise the use of virgin materials within the development.



- Alternative reuse and recycling schemes are available. For example, timber may be provided to projects such as the National Community Wood Recycling Project, who will collect waste timber for reuse or recycling, or sold on to other parties. Paints may be reused at other sites through donation and local reuse schemes.

Other Recovery

- Materials that are to be sent for energy recovery will be segregated to prevent cross contamination.
- Other recovery options should be used to treat wastes which cannot be managed through the options above.

Disposal

- All possible recovery options will be considered before determining that a waste is suitable for disposal.
- The SWMP will record the predicted quantity of contaminated material to be removed from site to authorised landfill and identify appropriate permitted facilities to which the waste can be taken.

5 OPERATIONAL WASTE MANAGEMENT

5.1 Dragon Packaging Limited is the existing tenant of the units and will remain the tenant in the extended premises.

5.2 Dragon Packaging Limited is accredited to BRCGS Packaging Materials standards. BRCGS is operated by the British Standards Institute, now operating as BSI Group which produces technical standards across a wide range of products and services, as well as supplying certification and standards related services to businesses.



5.3 BRCGS is part of the BSI Groups' Global Standards to assist with food stagey worldwide, assisting with legal obligations and compliance to ensure the safe delivery of food.

5.4 Dragon Packaging's current process for waste and waste disposal under the BRCGS Packaging Standard is:

- Manufacturing process and general waste is segregated:
 - Skeletal waste is baled, labelled, and stored outside until a full load is attained, then collected by the supplier for recycling. This process does not require registration as a controlled waste.
 - General waste, including broken pallets and material roll cores is placed in identified skips and removed by Ash Waste. This also does not require registration. Ash Waste holds certifications for downstream handling and processing.

5.5 The operational waste management will not materially change from present in the extended unit.

5.6 Operational waste works under principles of prevention, reuse, recycling, other recovery and disposal.



6 CONCLUSIONS

- 6.1 As an operating premises which is already accredited to BRCGS Packaging Materials standards the proposed development will make no material change to the approach to waste management in operation.
- 6.2 The construction waste management stage during construction will be the responsibility of the contractor which will be required to adhere to the waste hierarchy set out within Section 4.
- 6.3 The construction and on-going operational stages will adhere to the Waste Hierarchy that applies in Wales, and to wider international standards for management of waste in the food packaging industry.