

OTTERPOOL PARK

Environmental Statement Appendix 17.1: Waste Strategy

MARCH 2022



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1 Introduction

- 1.1.1 Arcadis Consulting (UK) Ltd has been commissioned by Otterpool Park LLP to prepare a Waste Strategy in support of the outline planning application for the Proposed development at Otterpool Park, Kent.
- 1.1.2 The planning application seeks permission for a new garden settlement accommodating up to 8,500 homes (Use Classes C2 and C3) and Use Class E, F, B2, C1, Sui Generis development, including use of retained buildings as identified, with related infrastructure, highway works, green and blue infrastructure, with access, appearance, landscaping, layout and scale matters to be reserved.
- 1.1.3 This Strategy is to be read in conjunction with the ES waste chapter which details forecast waste quantities per waste stream, across the different phases and building categories, i.e., residential, commercial etc.
- 1.1.4 The Proposed development would result in the generation of solid waste from the following phases:
- **Demolition** – The site is currently occupied by 102 buildings that comprise predominantly a mixture of farms and associated residential premises, as well as some commercial and industrial uses. Drawing OPM(P)1018_N YY (in support) within ES Appendix 4.15 illustrates the location and status of the buildings. Of the 102 buildings, six are to be retained, and 59 are to be demolished, and 37 that have the option to be retained or demolished.
 - **Construction and excavation** – as the existing site is largely undeveloped land, it is anticipated that material waste likely to arise from the construction and excavation phases would consist of hard and inert materials, soils and stones, plastics, packaging (wooden and plastic), insulation material, miscellaneous metals, canteen and office waste.
 - **Operation** – As the Proposed development is predominantly residential, most waste generated during operation would be municipal household waste, in addition to quantities of waste from the commercial and public facilities.
- 1.1.5 Waste is defined in Article 3 of the European Framework Directive on waste (2008/98/EC) as
- “any substance or object which the holder discards or intends or is required to discard”
- where the term:
- **‘waste holder’** is defined as the waste producer or the natural or legal person who is in possession of the waste; and
 - **‘waste producer’** is defined as anyone whose activities produce waste (original waste producer) or anyone who carries out pre-processing, mixing or other operations resulting in a change in the nature or composition of this waste.

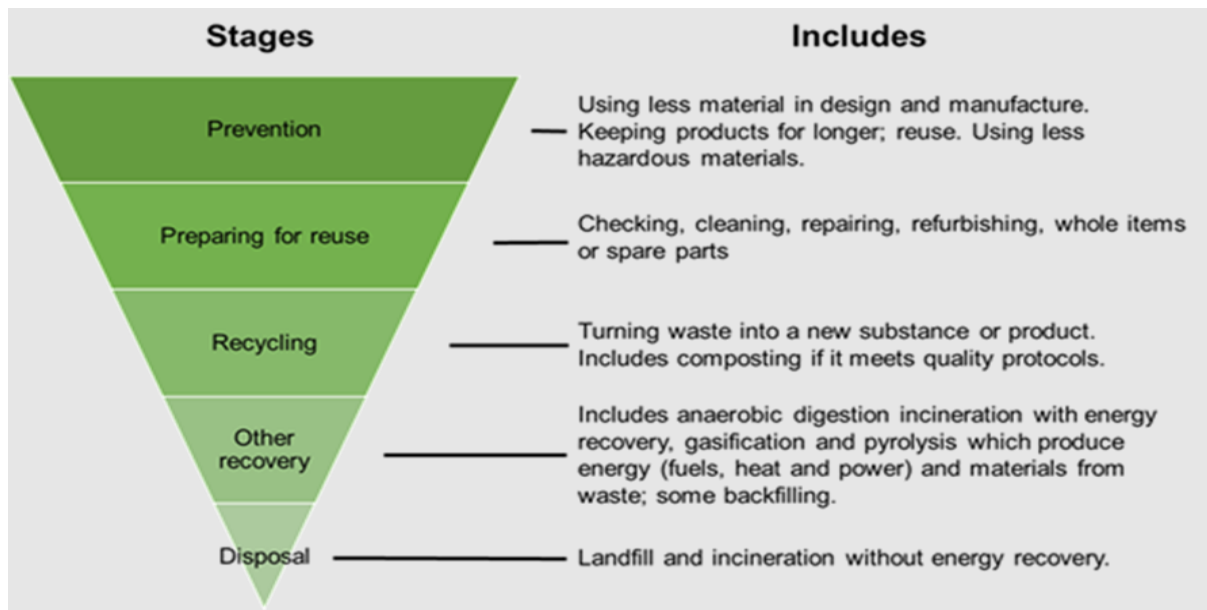


Figure 1 Waste Hierarchy

- 1.1.6 Waste can cause harm to the environment through its treatment and final disposal and, therefore, effective waste management should follow the principles of the waste hierarchy shown on Figure 1
- 1.1.7 This Strategy considers the potential impacts that may arise from waste generated during the demolition, construction, excavation and operational phases with the overall aim of developing an approach for legislative and policy compliance and best practice in the segregation, storage, collection, treatment and/or disposal of waste arisings. The Strategy proposes the most appropriate waste collection system for the Proposed development which saves space, provides value for money, minimises greenhouse gas emissions and maximises the recycling and recovery of material.
- 1.1.8 This Strategy addresses the potential effects of the Proposed development on waste management during construction and operation. This Strategy must be read in conjunction with the ES Waste Chapter (Chapter 17) which provides greater detail of the policy review and analysis of current and future waste arisings and the associated mitigation.
- 1.1.9 This Strategy will be updated periodically to align with the three-tier planning process that the Proposed development will be delivered through (as outlined in Chapter 17 of the ES). This version of the Strategy forms the key waste document that is prepared for tier one in support of the Outline Planning Application. As such, this Strategy sets out the overall framework for waste management in the Proposed development.
- 1.1.10 The Waste Strategy will be updated in parallel with the development of the detailed Masterplan and Infrastructure Framework at tier two of the planning process. The further information available on the Masterplan and infrastructure, along with any new technologies or policy will inform a more detailed revision of this Strategy. This will include further detail on waste storage and handling infrastructure needed to achieve waste targets within the context of the Masterplan.
- 1.1.11 A key aspect of the revised Waste Strategy at tier two will be to review the phasing of the Proposed development and the waste targets to ensure they are still correct and relevant. The Strategy will be refined to take into account the details of each phase and how waste will be managed within each phase prior to the full build out of the

Proposed development. It will also take into consideration any new legislation or policies.

- 1.1.12 Tier three of the planning process will involve the submission of Reserved Matters Applications which will coincide with a final update of the Waste Strategy. This final update will inform and support the Reserved Matters Applications by driving the inclusion of any refined details or additional infrastructure requirements to ensure waste targets can be met during operation of the proposed development.
- 1.1.13 A Site Waste Management Plan (SWMP) has also been prepared in support of the Outline Planning Application. The SWMP will also be periodically updated as the Proposed development progresses (see Sections 17.7.6 – 17.7.8 for details).

2 The Strategy

- 2.1.1 This Strategy sets out the waste management vision during design, construction through to occupation, with a clear purpose; **to set out the best way to manage the Proposed development's waste.**
- 2.1.2 The Strategy should be used to help form the design of the Proposed development, identifying innovative principles (See Otterpool Strategic Design Principles) to support ambitious targets to make Otterpool Park community an exemplary development in relation to sustainability and waste reduction/management.
- 2.1.3 This Strategy sets the road map for a 10-year period, between 2025 and 2035. It details targets for 2025, the first year of the Strategy and then more ambitious targets for 2035, aligning with Government legislation, local plans and the need to improve upon current recycling rates.
- 2.1.4 Reducing the environmental and financial impacts of the waste the Proposed development generates will help us deliver a sustainable development over the next 10 years and beyond.
- 2.1.5 The Strategy explains the contribution that improving the management of waste can have in helping to tackle climate change and other environmental impacts. It also promotes a circular economy approach, seeking opportunities to design out waste, design for longevity and flexibility, design for resource efficiency, reuse items of value, and keep them in circulation longer.
- 2.1.6 This Strategy is underpinned by local, regional and national waste legislation & policy requirements, and strongly influenced by the Kent Local Plan, Waste Management Plan for England 2021 and the Environment Act 2021. Particular focus is given to:
- Resource efficiency & waste reduction;
 - Increasing resource productivity;
 - Reducing volumes of residual waste;
 - Reusing products; and
 - The quality of recycling.

Local waste generation

- 2.1.7 The waste arisings in Folkestone and Hythe District generate a significantly lower amount of waste per household compared to Kent, however, achieve slightly worse on recycling performance. This pattern has been similar over the last five years. With this in mind, this Strategy places strong focus upon industrial symbiosis and supply chain and promoting wider social responsibility to increase recycling, reuse and recover value from the waste the Proposed development generates.
- 2.1.8 Greater community engagement and the promotion of social responsibility are key to any Strategy.
- 2.1.9 In line with ambitious targets for the Proposed development to be a flagship project for environmental impact, the targets set will encourage continuous improvement as the Proposed development grows and operates. A shift-change in working environments, due to COVID-19, means that in the short to medium term, it is anticipated that more people will be choosing to work from home, therefore household waste is likely to increase. Education of local residents will be vital for the successful attainment of the household waste targets. Developments in technology, policy and behaviours of residents and local authorities will help to deliver these targets.

Municipal waste

- 2.1.10 Kent County Council (KCC) administrative area currently has a residual waste per household (NI191) of **549kg¹**, which is just below the UK average of 553kg¹. Folkestone and Hythe District Council (F&HDC) has a marginally lower residual waste per household of **437kg¹**. A target of 476kg per household was set for KCC for 2020/21.
- 2.1.11 Kent County Council administrative area currently sends **44%²** of household waste for reuse, recycling or composting (NI192), which is below the national 2020 target of 50%. F&HDC sends **48%²**, which is just below the 2020 national target. Whilst they missed the national target, they were both higher than the England average of 42.3%². A target of 50% was set for KCC for 2020/21. Values for both KCC and F&HDC have been inconsistent over the last 5 years, with little overall progress in increasing total reuse and recycling.
- 2.1.12 KCC sends very little municipal waste to landfill (NI193). In 2020/21 KCC sent **2%** of its municipal waste to landfill. This is lower than both the SE average of 3.9% and England average of 7.8%.

Construction and demolition waste (C&D)

- 2.1.13 Baseline information is not widely accessible with regards to construction waste as this is not the responsibility of the Local or County Council. Construction waste is managed by private companies, therefore there is less monitoring or statistics available. Data has been obtained from WRAP to allow for calculations of construction waste to be undertaken, this draws on average UK data.
- 2.1.14 The latest available data reports that in 2018, 93.8% of non-hazardous C&D waste was recycled within England, this compares to 92.3% for the rest of the UK. Within the UK in this period, 67.8 million tonnes of non-hazardous C&D waste produced. Since 2010, recycling rates have fluctuated between **92%** and **93.8%**.
- 2.1.15 National data is held and published by the Department for Environment, Food and Rural Affairs (DEFRA), which reported that in 2018, the recycling rate was 93.8%.

Commercial and Industrial waste

- 2.1.16 There is no requirement on businesses or waste management companies servicing them to make records of the waste produced publicly available. Hence estimating quantities of Commercial and Industrial waste arisings, with any degree of accuracy, is a challenge.

¹ 2020/2021

² 2020/2021

3 Vision, Objectives and Targets

3.1 Vision

3.1.1 The vision of this Strategy is:

To provide a safe, clean and green development where people want to live and invest.

To promote a circular economy approach, which supports the sustainable design and construction, and communities of the Proposed development in generating the minimum amount of waste that is practicable, maximising reuse, recycling and recovery of energy from the remaining waste, to reduce the impact on the environment and encourage more sustainable use of resources for the benefit of society and the planet.

3.2 Objectives

3.2.1 The following objectives support the vision, acting as tangible enablers.

Objective 1: *Manage wastes generated from the Proposed development in a sustainable manner to reduce both its quantity and impact on climate change, and to maximise resource efficiency and circularity.*

Objective 2: *Seek to consolidate and improve the high performance of landfill diversion for all wastes generated by the Proposed development (Municipal, C&I and C&D).*

Objective 3: *Deliver the infrastructure to allow for maximum segregation of waste, facilitating improved quality recycle and less residual waste*

Objective 4: *Develop and support through stewardship, proactive education, engagement and enforcement, higher levels of waste prevention, reuse, recycling, and composting.*

Objective 5: *Ensure that services are accessible by all member of the Proposed development and that the community can participate in, and make a strong contribution to, the sustainable management of wastes generated.*

Objective 6: *Improve the management of wastes and resources generated by the Proposed development through proactive engagement and partnership with local industry and commerce to ensure the most sustainable waste management practices are employed.*

3.3 Targets

3.3.1 Building on national, regional, and local targets the following **6 targets** have been set for the Proposed development to achieve from 2025.

3.3.2 Targets have been set for Commercial & Industrial (C&I) waste, Household waste and Construction & Demolition (C&D) waste.

C&I TARGET 1:

Minimum 65%* of C&I waste sent for reuse, recycling, or composting.
(*75% by 2035)

C&I TARGET 2:

Maximum 5% of C&I waste sent to landfill.
(*75% by 2035)

HOUSEHOLD TARGET 1:

Minimum 65%* of household waste sent for reuse, recycling, or composting.
(*75% by 2035)

HOUSEHOLD TARGET 2:

Year on year decrease in residual waste per household.
Aspirational target of 350kg of residual waste per household

HOUSEHOLD TARGET 3:

Maximum 1% of household waste sent to landfill.

C&D TARGET:

Minimum 85%* of C&D waste to be reused or recycled, with 100% diversion from landfill.
(*90% by 2035)

3.4 Achieving the Construction and Demolition target

3.4.1 Nationally, the majority of C&D waste is reused, recycled or recovered (~90%), with a small proportion being sent to landfill. The Proposed development has the benefit of being sited near an Energy from Waste (EfW) facility, which should be utilised before landfill.

3.4.2 A large proportion of C&D waste generated in Kent is reused or recycled and policy support through the planning framework is provided to encourage improved management of waste streams.

3.4.3 The Proposed development has a SWMP, which has been written to ensure early consideration is given to likely waste types and quantities, and that waste minimisation opportunities are identified at the outset and implemented to ensure best practice waste management options and practices are employed.

3.4.4 The SWMP ensures that waste generated from the Proposed development is dealt with in line with the waste hierarchy. The need for good managed segregation will facilitate the clear separation of waste streams allowing a higher degree of reuse and recycling.

3.4.5 Working effectively together (Otterpool LLP, F&HDC and KCC) across the entire value chain, will allow a shift from the traditional linear model to a circular economy approach and facilitate the selection and procurement of sustainable materials that improve

resource productivity, efficiency and keep products and materials in use, allowing higher reuse and reconditioning.

3.4.6 The following figure shows the value chain steps and accompanying business model, which spans across planning, design, procurement, construction, operation and end of life. It emphasises how important collaboration and circular symbiosis is.

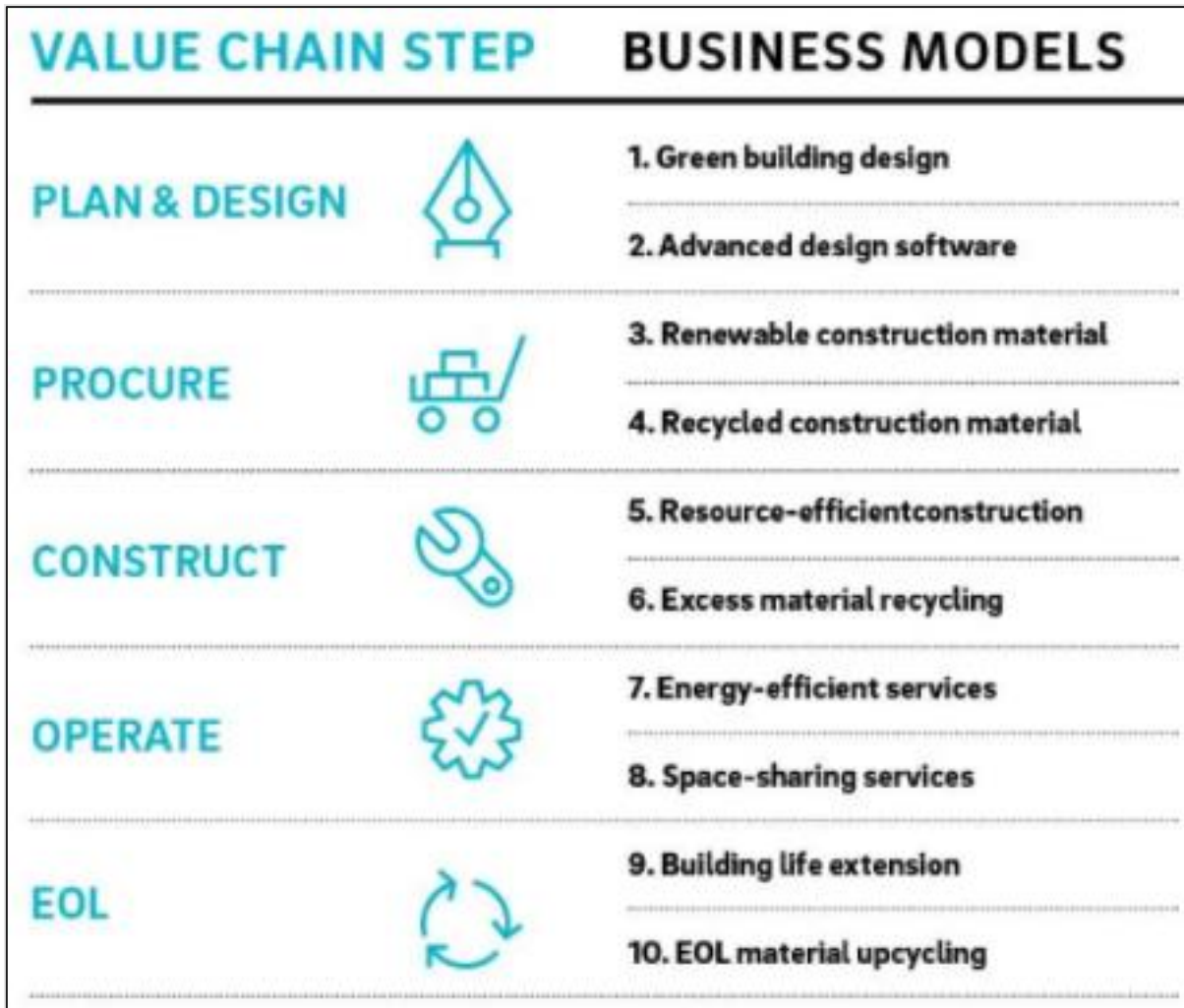


Figure 2 Value Chain Steps

3.5 Achieving the household waste target

- 3.5.1 Currently households within the F&HDC administrative area produce 401kg residual waste per household.
- 3.5.2 In line with the requirements of the Environment Act 2021, and the objectives of this Strategy the Proposed development will seek to provide facilities and space for all development types to fully segregate all household (including flats), commercial and industrial waste at source. This will allow for cleaner higher quality recyclate, that can be reprocessed into higher circularity value materials, and remain in the supply chain for longer. This will enable more waste materials to be recycled.

- 3.5.3 As a guide, the provision of spaces for operational waste segregation and storage in design should be calculated using **10m² per 1,000m²³** of net floor area.
- 3.5.4 Buildings must have an off-street collection area at ground level and built-in bin storage area doors must not open over the public footway or road. Bin stores located at the rear of properties with pathways to the street must be avoided as they can be difficult to access and use. Instead, well-designed front and side solutions that are fully integrated into the streetscape are preferred. Where these are inside buildings, they should be ventilated and include wash-down facilities so they can be cleaned.
- 3.5.5 In conjunction with this, it is critical that the Proposed development focuses on improving recycling infrastructure through strategic partnerships, to ensure as much material is captured for recycling and therefore reduce the residual waste proportion, and that going to landfill. Focus will be given to understanding better the types of waste generated by the development types across the Proposed development and ensuring the correct collection service is provided. For example, with the surge in online shopping, rising from 30% in 2020 compared to 10% in 2019, meaning more and more cardboard and packaging ends up in households, putting further pressure on consumers and collection services.
- 3.5.6 Kent County Council's **Reduce Waste, Recycle More** campaign will facilitate the drive to educate residents and businesses about best practices. This will be in addition to the stewardship programme and Community Trust provided and managed by Otterpool LLP.
- 3.5.7 In keeping with the requirements of the Environment Act 2021, kitchen and garden waste will be collected separately from the Proposed development.
- 3.5.8 Currently, no specific provision has been made for a Household Waste Recycling Centre (HWRC) within the Proposed development. The nearest HWRCs are located at Folkestone, approximately 8 – 12 km away, and Ashford, at approximately 12 – 20km. At the time of writing, F&HDC are reviewing further options for an additional HWRC.
- 3.5.9 The ES chapter acknowledges the need for a Waste Transfer Station within F&H to manage the growing demands placed on the district from current household waste generation and that forecast from Otterpool Park and other committed developments. At the time of writing, a number of [phased] options are being looked at, including; a new WTS within F&H, and a financial contribution from Otterpool LLP to manage the transfer of waste generated from the development outside of the district, in the short term.
- 3.5.10 To assist local residents and the collection authority in maximising reuse and recycling, Otterpool LLP will trial a reuse/repurpose bring site, where residents can bring items they no longer want for disposal, or for others to utilise or upcycle. This will be a stewardship initiative.
- 3.5.11 Other possible initiatives include:
- **Community composting project** - compliant with the third tier of the waste hierarchy (recycling)
 - **Public Incentives Scheme** - a scheme could be implemented to incentivise participation in recycling including performance-based charging schemes.

³ Based on best practice (BREEAM) 10m² per 1,000m² for buildings over 5,000m². It has been assumed that all individual units will be over 5,000m²

3.6 Achieving the commercial waste target

- 3.6.1 The commercial waste generated by the Proposed development will be managed in the same way as household waste. Adequate infrastructure and space will allow for fully segregated waste streams at source and strategic partnerships to maximise recycling and diversion from landfill.
- 3.6.2 This will be supplemented with a **Businesses Awareness Campaign**. This initiative will form part of the Stewardship programme, and Otterpool LPP will undertake in conjunction with F&HDC. It will include awareness leaflets and posters.
- 3.6.3 Appropriate collection services will ensure effective segregation and collection of wastes. A step change in commercial waste services is needed and critical in reaching this Strategy's objectives and targets, in addition to those set out in the Environment Act 2021.

4 Raising awareness and promoting sustainability

- 4.1.1 It is the responsibility of all stakeholders connected to Otterpool Park to drive awareness and promote sustainability. Working collaboratively to achieve a shared goal. This includes, Otterpool LLP, F&HDC, KCC and residential and commercial occupants.
- 4.1.2 Improving waste management practices and the conservation of resources helps in the fight against climate change. Through the Otterpool LLP stewardship programme, there is a great opportunity for the Proposed development to instil a strong sense of resident participation in sustainable waste management from the outset. A clear element of this is engaging with recycling services provided by F&HDC, so that reducing waste and maximising recycling becomes an integral part of everyday.
- 4.1.3 The environmental benefits from an effective recycling scheme are tangible and long reaching. F&HDC will implement a fully segregated collection scheme, but it can only be truly effective if it meets the [design] needs of all residents, and they actively participate and initiate improvement.
- 4.1.4 F&HDC will provide recycling and waste minimisation information to all residents of the Proposed development to encourage them to participate in sustainable management of resources, and in doing so, help meet requirements of the Environment Act 2021. Information will be easily accessible, relevant and timely.
- 4.1.5 A systematic approach is important to identify and deliver effective communications and marketing opportunities, raising awareness and knowledge of waste management and related issues and services. Effective participation will be enhanced by providing information on the benefits of improving waste management performance. Effective communication from Otterpool LLP, F&HDC and KCC, and positive messages about the development's achievements in resource and waste management and local benefits will be promoted. The Stewardship programme, together with F&HDC will facilitate this through letter drops, publication of recycling rates and waste arisings.
- 4.1.6 The importance and need to successfully engage with the young people of the Proposed development shouldn't be underestimated and both Otterpool LLP and F&HDC are committed to delivering a range of education, training and awareness initiatives as part of the overall Sustainability Strategy.
- 4.1.7 Education initiatives to promote waste and environmental issues include school visits, business visits and support to community initiatives. These will promote better understanding of waste prevention and recycling services and facilitate positive behaviour change.

5 Delivering the Strategy

- 5.1.1 To deliver the sustainability credentials set out in this Strategy, the Proposed development would seek to exceed the high performance already being achieved within the district and achieve the Strategy's targets.
- 5.1.2 SMARTWaste data outlines the most common lessons learnt from new build housing development within the UK. The following pie chart identifies these actions.

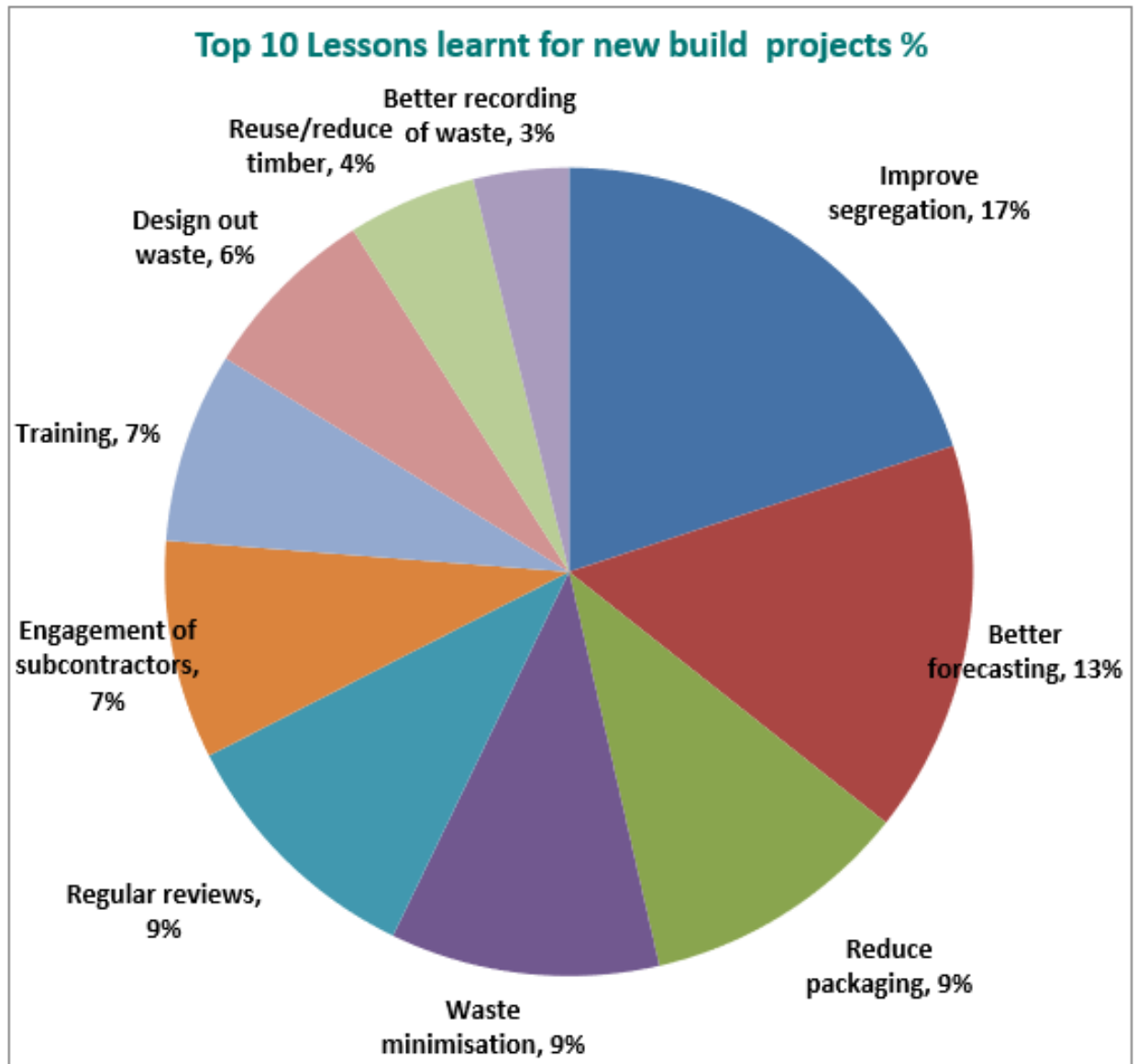


Figure 3 SMARTWaste Pie Chart

- 5.1.3 The following table outlines the party responsible for implementing these lessons:

Table 1 Responsible Party

Action	Responsible
Improve segregation	Designer / Contractor
Better forecasting	Designer
Reduce packaging	Contractor
Waste minimisation	Designer / Contractor
Regular reviews	Designer / Contractor
Engagement of subcontractors	Designer / Contractor
Training	Designer / Contractor
Design out waste	Designer
Reuse/reduce timber	Designer / Contractor
Better recording of waste	Contractor

- 5.1.4 Embedding these lessons within the design and build process will ensure that efficiencies are achieved on the greatest level. This will encourage less material and resource dependency, as well as using widely recycled materials, supporting a circular economy approach to design.
- 5.1.5 In line with the requirements of the Environment Act 2021, and the objectives of this Strategy the Proposed Development will seek to provide facilities and space for all development types to fully segregate all household (including flats), commercial and industrial waste at source. This will allow for cleaner higher quality recyclate, that can be reprocessed into higher circularity value materials, and remain in the supply chain for longer. This will enable more waste materials to be recycled.
- 5.1.6 In conjunction with this, it is critical that the Proposed development focuses on improving recycling infrastructure through strategic partnerships, to ensure as much material is captured for recycling and therefore reduce the residual waste proportion, and that going to landfill. Focus will be given to understanding better the types of waste generated by the development types across the Proposed development and ensuring the correct collection service is provided. For example, with the surge in online shopping, rising from 30% in 2020 compared to 10% in 2019, meaning more and more cardboard and packaging ends up in households, putting further pressure on consumers and collection services.
- 5.1.7 **Table 2** below sets out the actions designed to facilitate the delivery of the vision, objectives, and targets. All stakeholders will work together to maximise circularity and achieve the objectives and vision of this strategy.
- 5.1.8 The Strategy, actions and key targets will be reviewed every 5 years to ensure that they reflect any changes in national and local policy and legislation. A full review will be undertaken in 2030.

Table 2 Action Table

Action	Timescale	Implementation
Otterpool LLP		
Adequate space and storage will be built into the masterplan and the design of each development type to ensure full segregation of all waste streams.	2025	Tier 2 Design Codes, contracts
Adequate space will be provided for the safe passage of waste collection vehicles on the Proposed development's road network to safely and efficiently collect wastes from all development types. Waste related space requires will be integrated into design briefs for all publicly commissioned buildings.	2025	Traffic Management Plan, Tier 2 Design Codes, contracts
Allocated land will be earmarked for a reuse/repurpose bring site for the Proposed development to utilise and integrated, where possible, with the proposed mobility hubs.	2025	Tier 2 Design Codes, contracts
Otterpool LLP & KCC		
Otterpool LLP/ Designers in conjunction with KCC to explore opportunities to provide a bring site/repurposing site within the Proposed development.	2028	Every resident in the Proposed development has access to a bring /repurposing site.
Otterpool LLP/ Designers in conjunction with KCC to secure a contract with a suitable Materials Recycling Facility, to sort the recyclables collected through the fully segregated kerbside recycling collection to maximise recycling	2025	New contract established, Tier 2 Design Codes
Otterpool LLP & F&HDC		
Otterpool LLP in conjunction with F&HDC to undertake a baseline audit estimating waste arising, material types, and composition of the wastes. With a view to recycling or composting more of the Proposed development's waste.	2025	Completed audit report & action plan
Otterpool LLP/ Designers in conjunction with F&HDC to develop and implement a fully segregated recycling service, including the collection of glass, cans, card, paper, plastic bottles, kitchen waste, garden waste etc for all development types (residential commercial, industrial) To ensure opportunities are captured to maximise recycling in both design and collection.	2025	Every resident (residential commercial, industrial) of the Proposed development is able to recycle glass, cans, paper, card, plastic bottles, kitchen waste, garden waste etc from their own house/flat/building.
Otterpool LLP, F&HDC and KCC		
The proposed Development will be built in line with the Value Chain Steps.	2025	CoCP, Contracts

Action	Timescale	Implementation
Otterpool LLP, F&HDC and KCC will support at least three events each year that promote the recycling and composting of waste.	2025	Three awareness raising and educational events held each year.
Otterpool stewardship programme, F&HDC and KCC to link the sustainable waste management message and awareness events to the council's wider Climate Change programme, including the upcoming net zero toolkit, which will be used to feed into sustainable design considerations and opportunities.	2025	Three awareness raising and educational events held each year.
F&HDC		
F&HDC (as landlord, if applicable) to set KPIs (recycling, total waste, residual, electricity use, water use etc) for all business tenants, including associated monitoring and reporting mechanism.	2025	Contractual requirements on business tenants.
F&HDC (as buyer, if applicable) to set standards for supply chains associated with the construction of the Proposed development and operation of all business units.	2024 +	Contractual requirements on Principal Contractor, and business tenants. Robust evaluation criteria agreed as part of procurement.
Otterpool Park maintenance contractors to have the opportunity to purchase soil improver made from garden waste collected from the Proposed development, as part of closed-loop initiative	2028	Soil Improver to be available for maintenance contractors to purchase, Tier 2 Design Codes
F&HDC to review food waste collection options at the first Strategy review point in 2027 ⁴	2027	Review collection options and agree options to take forward, and associated actions.
F&HDC & KCC		
F&HDC/KCC where practicable to facilitate the utilisation of green waste compost in the parks and grounds of the Proposed development	2028	Compost is used in the Proposed development's parks and gardens.
F&HDC, KCC and third parties to work collaboratively to ensure best value disposal costs for the residents of the Proposed development.	2025 - 2030	Waste treatment costs remain competitive.
KCC		
KCC will continue to reduce the amount of waste from the Proposed development that is sent to landfill.	2025	Percentage of waste landfilled will continue to fall over the duration of the Strategy.
KCC to explore markets and work with third-party waste disposal companies to increase the proportion of incinerator bottom ash recycled.	2030	Further increase the amount of bottom ash recycled.

⁴ To feed into the end of the current waste contract, that ends 2029.

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