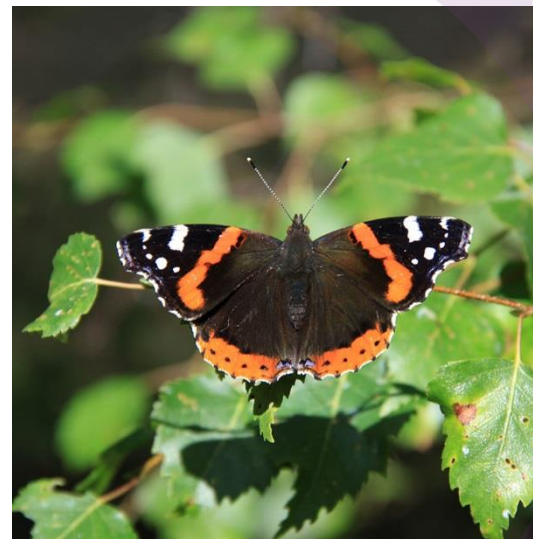


London Luton Airport Operations Ltd

London Luton Airport -19 mppa

Site Waste Management Plan



Report for

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1	First Draft	Dec 2019
2	Second Draft	Apr 2020
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Executive summary

Purpose of this report

This report has been prepared by Wood Environment and Infrastructure Solutions UK Limited on behalf of London Luton Airport Operations Ltd (LLAOL), to support London Luton Airport Operations' application to increase total passengers per annum from 18 million (mppa) to 19 million (mppa). In response to Luton Borough Council's Screening Options letter (23 August 2019), a Site Waste Management Plan (SWMP) is included for the purpose of updating the Waste Management Statement submitted in 2012 for the original planning permission (12/01400/FUL).

The report sets out the regulatory requirements for waste management, relevant national and local policies, and provides a SWMP outlining waste management procedures at Luton Airport, along with an assessment of waste arisings and potential impacts associated with an increase from 18mppa to 19mppa.

The proposals for 19mppa are estimated to result in operational waste arisings of 2,630 tonnes/annum. The SWMP assessment estimates that based on the most recent annual waste data available, calculated for 18 mppa in 2019 (0.138 kg of waste/PAX), an additional 1mppa would result in an increase in operational waste arisings of 138 tonnes/annum (6%), or, an increase of 56 tonnes/annum (2%), based on waste generation rates that applied in 2011 (0.143 kg of waste/PAX), at the time of the original planning permission for 18mppa. The evaluation indicates a moderate impact on total waste arisings under the 19mppa proposals, and minimal impact on the day-to-day management of operational waste. Strategies for improved management and minimisation of waste at the airport are outlined, with targets to reduce passenger waste rates that should further reduce the impact of the 19mppa proposals on waste arisings.

Luton Airport operational waste – forecasts for 18mppa and 19mppa

Scenario / Year	Waste (tonnes/annum)	Number of Passengers (mppa)	Representative waste generation rate (kg/PAX) ⁵	Waste forecast for 18mppa (tonnes/annum)	Waste forecast for 19mppa (tonnes/annum)
Scenario 1: 2019	2,492 ⁴	18.0 ⁶	0.138	2,492	2,630
Scenario 2: 2011	1,357 ⁷	9.5 ⁸	0.143	2,574	2,717
Scenario 3: 2025	N/A	N/A	0.12 (target)	2,160	2,280

LLAOL has determined that for an increase to 19mppa there is sufficient capacity within the airport's existing infrastructure for routine operational waste arisings. The planning application does not include any physical changes to the airport terminal building and surrounding infrastructure; therefore, no waste is expected to be generated by construction, demolition or excavation activities.

The SWMP demonstrates that existing procedures for management of waste generated by the airport's operations have delivered a reduction in passenger waste rates and are consistent with the principles of the waste hierarchy; these will continue to be applied to operations for 19mppa. The actions proposed within the SWMP reinforce existing waste management procedures at London Luton Airport, ensuring the airport will continue to achieve targets for recycling and diverting waste from landfill, and providing the basis for the effective management of operational waste for 19mppa.

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1. Introduction

1.1 Background

This report has been prepared by Wood Environment and Infrastructure Solutions UK Limited on behalf of the London Luton Airport Operations Ltd (LLAOL), to support LLOAL's application to increase total passengers per annum from 18 million (mppa) to 19 million (mppa). A Site Waste Management Plan (SWMP) is included for the purpose of updating the Waste Management Statement submitted in 2012 for the original planning permission (12/01400/FUL), which allowed capacity at the Airport to increase to 18mppa by 2026/27. As set out in the 'Vision 2010-2050' document published in 2017¹, that capacity was expected to be reached by circa 2020/21, six to seven years ahead of original expectations.

The requirement for a SWMP for the proposed increase in passenger capacity to 19mppa was identified in Luton Borough Council's Development Control Screening Opinion letter (23 August 2019):

"Site waste management plan – updating the waste/recycling information for the original permission to consider the impact of an additional 1mppa,"

This is in accordance with principles within national and local policies regarding sustainable development and waste minimisation, including strategic objectives and policy approaches within Luton Borough Council's Luton Local Plan 2011–2031 (Nov 2017):

Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

1.2 Scope

This report provides a summary of regulatory requirements for waste management, and relevant national and local policies. This is followed by a SWMP identifying waste streams² and management practices associated with Luton Airport's existing operational activities, and an evaluation of potential waste arisings associated with the proposed change in capacity from 18mppa to 19mppa. The SWMP contains an appraisal of strategic options to prevent, reduce and recover waste associated with the increased passenger capacity. This includes a plan of potential actions for managing waste arisings to ensure that the most preferred options within the waste hierarchy are followed, to deliver effective management and ongoing minimisation of waste. The objectives of the waste management options (in order of preference, in accordance with the waste hierarchy) are to:

- Minimise raw materials consumed and the volume of waste produced;
- Re-use any waste produced, where practicable;
- Recycle waste, where reuse is not practicable;
- Recover waste, where feasible; and
- Dispose of any remaining waste streams in accordance with legislative requirements

There are no physical changes proposed to the airport terminal building and surrounding infrastructure, so no waste is expected to be generated by construction, demolition or excavation activities.

¹ London Luton Airport Vision for Sustainable Growth 2020-2050 (London Luton Airport Ltd, Dec 2017)

² Note: Water use, foul water and drainage are not within the scope of this SWMP, these are addressed separately in a Drainage and Water Supply Infrastructure Appraisal (Wood, Sep 2020).

2. Policy and Regulatory Context

2.1 Introduction

This section provides a summary of key policies and regulations governing waste management for the application to increase passenger capacity at Luton Airport to 19mppa. A comprehensive list of legislative, regularity and policy requirements relating to waste management is provided in Appendix A.

2.2 Regulatory Requirements

Some of the key legislative requirements for a SWMP with respect to duty of care and application of the waste hierarchy include, but are not limited to, the following:

Waste Framework Directive (WFD) (2008/98/EC)

Provides the overarching legislative framework for the collection, transport, recovery and disposal of waste, and includes a common definition of waste. Waste classification is based on the European List of Waste (LoW) (Commission Decision 2000/532/EC); and Annex III to Directive 2008/98/EC. The aim of the WFD is to promote waste prevention, increase recycling and ensure better use of resources, whilst protecting human health and the environment.

Waste (England and Wales) Regulations 2011 (as amended)

These regulations transpose the WFD into law resulting in a number of changes to waste management, including placing greater emphasis on the waste hierarchy to encourage more waste prevention, re-use and recycling, and obligations under duty of care to consider the waste hierarchy, such as a declaration on transfer notes and hazardous waste consignment notes. The amendments introduced in 2012 also place duties on collections of waste to collect four key materials separately (waste, paper, metal, plastic and glass), and to keep these materials separate from other waste or other material with different properties.

Environmental Protection Act 1990

The Environmental Protection Act 1990 deals with issues relating to waste, defining all aspects of waste management and sets the legislative framework for waste management and control of emissions into the environment. It imposes a duty of care on anyone who produces, imports, keeps, stores, transports, treats or disposes of waste.

Waste Duty of Care Code of Practice (2018)

This code of practice was issued under Section 34 of the Environmental Protection Act 1990 and sets out how those dealing with waste are expected to meet their waste duty of care, including requirements to prevent unauthorised treatment or disposal of waste, provide storage to prevent uncontrolled escape of waste and ensure proper transfer of waste to third parties. Copies of waste transfer documentation must be retained for two years for non-hazardous waste, and three years for hazardous waste consignment notes.

Landfill Directive (1999/31/EC)

The Landfill Directive requires reductions in the quantity of biodegradable waste that is landfilled, and encourages diversion of non-recyclable and non-usable waste to other methods of treatment.



The Environment Bill (Draft Bill 9-58/1)

The draft Environment Bill is currently proceeding through Parliament but has not been adopted yet, so precise details may be subject to change.

The draft Environment Bill makes provision for targets, plans and policies to provide stronger protection for the environment, include measures relating to waste and resource efficiency. With respect to waste management a key aspect of the draft Environment Bill is the extension of existing duties included in the Waste (England and Wales) Regulations 2011 for the separate collection of recyclable materials, to cover food waste and the need for food waste to be separated from other recyclables (including mixed recyclables). Further provisions are also proposed in the draft Environment Bill in relation to producer responsibility for products, which may have a bearing on waste management in terms of packaging waste, deposit return schemes and information regarding options for the recycling of products at the end of their life cycle.

2.3 Policy Requirements

National Planning Policy Framework (NPPF) (2019)

The NPPF sets out the Government's planning policies for England and how they should be applied to developments. The NPPF states that the planning system should "*contribute to the achievement of sustainable development*" and that in order to achieve it the planning system must be aligned to economic, social and environmental sustainability which should be pursued jointly. The environmental objective specifically includes "*minimising waste and pollution*". The NPPF should be read in conjunction with the Government's planning policy for waste.

National Planning Policy for Waste (October 2014)

The National Planning Policy for Waste (NPPW) refers to the Government's ambition to work towards a more sustainable and efficient approach to resource use and management, identifying opportunities for improvements through driving waste management up the waste hierarchy.

The NPPW also states that "*when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

- The likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;
- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape...; [and]
- The handling of waste arising from the construction and operation of development maximises reuse / recovery opportunities, and minimises off-site disposal.

Our Waste, Our Resources: A Strategy for England (2018)

The Government's Resources and Waste Strategy sets out plans to improve use of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. Proposed strategies include:

- "Improving recycling rates by ensuring a consistent set of dry recyclable materials is collected from all households and businesses"; and

- “Work to align the National Planning Policy for Waste and planning practice guidance with the Resources and Waste Strategy and continue to maintain building regulations guidance to support its objectives.”

Luton Local Plan 2011–2031 (2017)

The Luton Local Plan (2011–2031) sets out policies and strategic objectives for environmental, social and economic aspects to be considered in the assessment of local development and planning applications. With respect to waste the Luton Local Plan builds on, and makes reference to, a number of earlier local policy documents, including the *Bedfordshire and Luton Minerals and Waste Local Plan* (2005); the *Minerals and Waste Local Plan* (2014); and *Managing Waste in New Developments – Supplementary Planning Document* (2006). In some instances the Luton Local Plan identifies that previous waste policies have been replaced (i.e. Luton Local Plan Policy LLP37 replaces the following policies in the *Bedfordshire and Luton Minerals and Waste Local Plan* (2005): W4: Waste minimisation, and W5: Management of wastes at source: waste audits). The following policies and objectives in the Luton Local Plan are relevant to waste management in development proposals:

- **Policy LLP37 Climate change, carbon and waste reduction and sustainable energy – Waste:** *The Council encourages an overall reduction in the amount of waste generated, treated and disposed of to reduce the need for land for waste management. Proposals that are likely to generate significant volumes of waste through development or operational phases will be required to include a waste audit as part of the application.*
- **Strategic Objective 11:** *To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.*
- **Para 11.55:** *Reducing the need for primary materials, reusing and recycling can save money and lead to better resource efficiency. The earlier this is considered in any planned development, the greater and more achievable the options are. In turn, this should lead to more sustainable development being designed and built. The detailed benefits of this approach are described in more detail in the supplementary planning document, ‘Managing Waste in New Developments’*
- **Para 11.62:** *Government policy requires development plans to include policies to minimise waste and pollution.*
- **Para 11.63:** *The planning authority should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

Minerals and Waste Local Plan: Strategic Sites and Policies (2014, Bedford Borough Council, Central Bedfordshire Borough Council and Luton Borough Council)

The Minerals and Waste Local Plan (2014) covers a number of policies relating to strategic waste management in the local area, including development of waste facilities and other types of development.

- **Waste Strategic Policy WSP 1 – The Provision of Recovery and Disposal Capacity:**

WSP 1 sets out targets for minimum levels of recovery for both public sector and business sector wastes at the date of the adoption of the Plan, and up to 2020. Some the key targets repeated those set out at policy WM2 of the East of England Plan published in 2008 (now withdrawn), and the Waste Strategy for England 2007.

- ▶ *Recovery of at least 50% of municipal solid wastes by 2013, 70% by 2015, and 75% by 2020; and*
- ▶ *Recovery of at least 72% of commercial and industrial wastes by 2013, and 75% by 2015.*

Managing Waste in New Developments – Supplementary Planning Document (2006, Bedfordshire County Council and Luton Borough Council)

This supplementary planning document (SPD) is referenced in the Luton Local Plan (2017) in the context of resource efficiency and waste management in planned developments. The overall aim of the SPD is to provide guidance on sustainable waste for new developments, however some of the principles may be relevant to any development. The SPD provides guidance and recommendations in relation to waste audits for planning applications.

- **Waste Audits – When is it required?**

The principles of sustainable waste management practice should apply to all developments. This includes new buildings and engineering operations, change of use, refurbishment and conversion. It is recognised however that waste auditing will only be required for new developments.

- *A number of key objectives have been identified which are set out below:*
 - ▶ *To offer practical guidance to those involved in the development process to reduce, reuse and recycle waste;*
 - ▶ *To influence the design of new development;*
 - ▶ *To allow an efficient and effective waste management service to be provided;*
 - ▶ *To enable all occupiers to have the best opportunities to reduce, reuse and recycle waste; and*
 - ▶ *To improve skills in sustainable waste management by raising awareness and applying best practice.*

3. Site Waste Management Plan

3.1 Existing Waste Management

Established procedures and facilities at London Luton Airport are in place to manage waste from airside and landside operations, including waste generated from maintenance hangars, cargo operations, fire station, offices and various concessionaries and other functions within the Terminal Building.

LLAOL use a single waste contractor (Veolia) to manage the majority of the waste generated at the airport, covering, collections from around the site; consolidation and storage in a central waste area; sorting to improve segregation of recyclable materials; and onward transfer of waste to approved recycling, recovery or disposal facilities. Third party waste contractors are also used for specific waste types, such as lead-acid batteries, waste oils and tyres.

All operational waste³ from day-to-day operations at Luton Airport is diverted from landfill (with the exception of sanitary waste under a cleaning contract). Waste is either recycled or recovered (60% in 2019, of which 11% was treated by anaerobic digestion), or sent to a local waste to energy facility. LLAOL works with its waste contractor to identify opportunities to improve waste management at the airport; following the introduction of on-site sorting of recyclable materials recycling and recovery rates increased from 34% in 2016 to 60% in 2019. A summary of the most recent information available on wastes generated and management routes is provided in Table 3.1, when the airport was operating at 18mppa in 2019.

Table 3.1 Luton Airport operational waste for 18mppa in 2019⁴

Category	Tonnes	Description
Dry mixed recyclables	795	Collections of mixed recyclables (e.g. paper/cardboard, plastics, cans/cups, packaging) from airport buildings, with some on-site sorting and segregation of recyclable materials prior to transfer to off-site recycling facilities.
Segregated Recyclables:		
- Cardboard	235	Segregated recyclable materials are consolidated in the on-site waste area, with compaction and bailing where appropriate, before transfer to off-site recycling facilities.
- Glass	140	
- Wood	12	
- Metal	6	
Food waste	273	Food waste is collected from businesses at the Terminal Building, for off-site treatment at a local anaerobic digestion facility
Cooking Oil	7	Used cooking oil is collected from businesses for conversion into biofuel
Non-recyclable general waste	995	Non-recyclable general waste is sent to a local waste to energy facility
Hazardous wastes and waste electrical and electronic equipment (WEEE)	24	The main hazardous wastes consist of contaminated absorbents (including airfield clean-up materials); passenger aerosols; waste oils and solvents (from Hangar 24 maintenance areas and Fire Station); batteries and some components in electrical waste/IT equipment. Wastes such as oils, solvents or WEEE are recycled where possible, or otherwise transferred for disposal at appropriate hazardous waste facilities.
Other	5	Other waste includes de-minimis quantities of materials such as inert waste from minor construction projects. The waste is typically generated on an ad-hoc basis and transferred for recycling or disposal at appropriate waste facilities.
Total waste	2,492	

³ Operational waste excludes aircraft and 3rd party waste as LLAOL do not have control over its management

⁴ Operational waste data for 2019 provided by the Environment Manager for London Luton Airport Ltd (email 04 September 2020))

3.2 Future Waste Management

The *London Luton Airport Limited Sustainability Strategy (2019)*, set out plans to improve management of waste at the airport, stating objectives to work with the operator (LLAOL), contractors, tenants and airlines to increase recycling rates and reduce the amount of waste sent to landfill. The strategy includes actions to encourage recycling of operational waste with the following waste recycling and reduction targets:

- Reduce operational waste to less than 0.12 kg/pax by 2025 (2019: 0.14kg/pax)
- Recycle at least 70% of non-hazardous operational waste by 2022, and 100% of non-hazardous operational waste by 2031 (2019: 60% recycled)
- Continue diverting 100% of non-hazardous operational waste from landfill
- Achieve the Carbon Trust Standard for Zero Waste to Landfill accreditation by the end of 2020
- All new concession contracts to include a requirement for zero single use plastics
- Zero single use plastics to be provided within LLAOL facilities by 2027

A summary of forecast annual waste arisings associated with the increase in London Luton Airport's capacity from 18mppa to 19mppa is provided in Table 3.2. The most recent information available on annual waste reported for 2019 provides a waste generation rate for 18mppa (0.138 kg waste/PAX), which is assumed to most closely represent current waste management at the airport, reflecting improvements in waste management since 2011 (although it is recognised there may be short term impacts on waste management and arisings during 2020, along with the potential for further reductions in waste generation rates before the airport reaches pre-2020 passenger capacities). It is assumed that the nature of operational activities generating waste at the airport for 19mppa will not be significantly different to operations for 18mppa, so waste types and proportions will be similar to those identified for 18mppa in 2019. As stated previously, it is also understood that the planning application to support the increase of the airport's capacity to 19mppa does not include any physical changes to the airport terminal building and surrounding infrastructure; therefore, no waste is expected to be generated by construction, demolition or excavation activities. Table 3.2 sets out forecast waste quantities for 18mppa and 19mppa under three waste generation scenarios:

- **Scenario 1 - 2019:** 0.138kg waste/PAX (representative of current waste generation rate);
- **Scenario 2 - 2011:** 0.143kg waste/PAX (waste generation rate for the original 18mppa planning permission); and
- **Scenario 3 - 2025:** 0.12kg waste/PAX (forecast based on the target waste generation rate for 2025).

Table 3.2 Luton Airport operational waste – forecasts for 18mppa and 19mppa

Scenario / Year	Waste (tonnes/annum)	Number of Passengers (mppa)	Representative waste generation rate (kg/PAX) ⁵	Waste forecast for 18mppa (tonnes/annum)	Waste forecast for 19mppa (tonnes/annum)
Scenario 1: 2019	2,492 ⁴	18.0 ⁶	0.138	2,492	2,630
Scenario 2: 2011	1,357 ⁷	9.5 ⁸	0.143	2,574	2,717
Scenario 3: 2025	N/A	N/A	0.12 (target)	2,160	2,280

⁵ Representative waste generation (kg/PAX) calculated from Waste (tonnes/annum) / Number of Passengers (mppa)

⁶ London Luton Airport Annual Monitoring Report 2019

⁷ LLAOL Waste Management Statement – London's Local Airport Planning Application (Nov 2012)

⁸ London Luton Airport Annual Monitoring Report 2011

Over the period 2011 to 2019 passenger numbers at Luton Airport increased by 89%, however total waste arisings increased at the lower rate of 84%, demonstrating the effect that improved waste management procedures have had on passenger waste rates. As stated above, the waste generation rate of 0.138 kg/PAX for 2019 is taken to be representative of waste management for current airport operations. In terms of the impact of an additional 1mppa for 19mppa, Table 3.3 provides a summary evaluation of waste arisings for the three scenarios, taking into account current waste rates (scenario 1), baseline conditions from 2011 (scenario 2), and future targets (scenario 3).

Table 3.3 Waste scenario impacts for additional 1 mppa

	Waste for 19mppa (tonnes/annum)	Waste for 18 mppa (tonnes/annum)	Waste for 1 mppa (tonnes/annum)
Scenario 1 (2019: 0.138 kg/PAX)	2019 forecast = 2,630	2019 forecast = 2,492	138 (6%)
Scenario 2 (2011: 0.143 kg/PAX)	2011 forecast = 2,717	2011 forecast = 2,574	143 (6%)
	2019 forecast = 2,630	2011 forecast = 2,574	56 (2%)
Scenario 3 (2025: 0.12 kg/PAX target)	2025 forecast = 2,280	2025 forecast = 2,160	120 (6%)
	2025 forecast = 2,280	2011 forecast = 2,574	- 294 (-11%)
		2019 forecast = 2,492	-212 (-9%)

- Scenario 1 – 2019:** Under generation rates assumed for current operations the forecast waste of 2,630 tonnes/annum for 19mppa would be a marginal increase of 6% (138 tonnes/annum) compared to same waste rate for 18mppa. As may be expected, this is directly proportional to the increase in passenger numbers.
- Scenario 2 – 2011:** If the 2011 waste rate of 0.143 kg/PAX is used for both the 18mppa and 19mppa forecasts, then again, the impact of 1mppa is a 6% increase in waste arisings, in line with the increase in passenger numbers. However, if the more representative forecast for 19mppa of 2,630 tonnes/annum (based on 2019 waste rates for 18mppa) is put in the context of 'baseline' waste generation rates at the time of the original planning permission, this represents a marginal increase of 2% (56 tonnes/annum) compared to what may have been forecast in 2011 for 18mppa (i.e. 2,574 tonnes/annum for 18mppa based on 2011 rates).
- Scenario 3 – 2025:** Although it is understood that the proposed increase to 19mppa may be reached before the 2025 target to reduce waste rates to 0.12kg/PAX, a comparison under this scenario of improving passenger waste rates indicates that estimated waste arisings of 2,280 tonnes/annum for 19mppa would be lower than both the 2011 estimate and 2019 actual waste arisings for 18mppa (2,574 tonnes/annum and 2,492 tonnes/annum respectively).

LLAOL has determined that on a day-to-day basis there is sufficient existing capacity and infrastructure at the airport to manage any increase in operational waste for 19mppa. The forecast waste arisings for 19mppa indicate there would initially be a marginal increase in total waste arisings compared to 18mppa, but taking into account ongoing targets and strategies to improve management of operational waste by 2025, the overall impact would decrease over time.

3.3 Waste Management Plan – Options and Actions

A waste management plan for the proposed increased to 19mppa capacity should be based on the same principles that have delivered the current improvements at London Luton Airport, promoting waste prevention, reduction and optimisation for recycling.

General waste management actions for an operational waste SWMP are outlined in Table 3.4, which also incorporates targets and objectives developed with LLAOL in London Luton Airport Ltd's (LLAL) latest Sustainability Strategy (see Section 3.2). It is recognised that the majority of the actions listed may already be implemented at the airport, and as such the SWMP is a continuation of procedures to improve waste management. LLAOL should monitor waste arisings and recycling rates to ensure there is no adverse impact on performance for 19mppa, and that effective collection, segregation and secure storage of all waste streams is maintained. Similarly, LLAOL should hold pre-emptive discussions with Veolia and any third party waste contractors to ensure there are no restrictions in capacity at facilities for the onward transfer of the airport's waste for 19mppa. It is good practice to identify alternative waste treatment/disposal routes in the event that preferred options become unavailable. In addition to the actions set out in Table 3.4 LLAOL may wish to consider options to develop alternatives for on-site waste treatment (e.g. composting or anaerobic digestion), although these may not be pragmatic options at the current time due to the marginal increase in total waste arisings.

Table 3.4 Operational waste management actions

Item	Waste management actions
Duty of care	<p>Generators of waste at the airport have legal obligations to comply with the waste duty of care to ensure that waste they are responsible for is handled safely and in compliance with the appropriate regulations. The duty of care involves making sure that the waste has been described properly and that all of the material properties are known; and to ensure that persons involved in the transfer of waste hold the necessary authorisation to do so. Basic responsibilities include:</p> <ul style="list-style-type: none"> • Identify whether waste is hazardous or non-hazardous; • Store waste in suitable containers at a secure location, in a manner that prevents release of the waste; • Label the waste containers with clear identification of contents; • Check that any person collecting waste holds an appropriate environmental authorisation (i.e. the waste carrier is registered or is exempt from having to be a registered waste carrier). It is also good practice to check that the facility that will receive the waste holds a suitable environmental permit that allows the waste to be handled on their site; • Waste transfer documentation that accurately describes the waste and contains the relevant European Waste Catalogue (EWC) code for the waste; and • Keep a record of all waste transfers.
Hazardous waste	<p>Persons responsible for the generation of waste must know the difference between hazardous waste and non-hazardous waste. To prevent risk of harm to humans and the environment the properties of individual hazardous waste streams shall be assessed to determine the relevant methods for storage and handling.</p>
Segregation and storage	<p>Segregation of hazardous and non-hazardous waste streams according to type ensures efficient waste management, and enables improvements in waste reduction and recycling. This should include separate containers for dry recyclables (paper, cardboard, plastic, glass, metal and wood). The site shall ensure the capacity and location of waste storage for buildings and activities, takes into account:</p> <ul style="list-style-type: none"> • Waste quantities and characteristics; • Segregation possibilities (including baling and compaction) as well as requirements; • Collection frequency and vehicle access (ingress and egress); • Site staff access and manual handling / lifting requirements; • Adequate space to store waste between collections; • Defined areas for specific containers and types of waste; • Clear signage and labelling of storage containers; and • Requirements for covering, ventilation, drainage and impermeable surfaces.

Item	Waste management actions
Waste Electrical and Electronic Equipment (WEEE)	Where WEEE is generated at the airport this should be recycled by a contractor with the appropriate licences and permits. It is the responsibility of organisations generating WEEE to ensure that the material is taken to an approved treatment facility to be treated and recycled, and to keep evidence that WEEE was given or sold to a waste management (or asset management) business, and was treated and recycled in an environmentally sound way.
Producer responsibility	Producer responsibility relates particularly to the management of WEEE, batteries and packaging. It requires businesses to minimise waste arising and promote their re-use; ensure waste products are treated and meet recovery and recycling targets for the waste materials; and design products by reducing material use and enhancing reusability and recyclability.
Packaging	The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended) require businesses or organisations to reduce the generation of packaging waste and disposal of packaging in landfill, and to increase the amount of packaging waste that is recycled and recovered. Segregation of the different elements of packaging waste from other wastes, including packaging materials is an important strategy to improve the recycling of packaging materials. The amount of packaging waste can be reduced by returning as much packaging back to the supplier as possible.
Staff engagement (including concessionaries)	Regular promotion or training on waste management issues can improve waste prevention and reduction, especially where this can be identified in terms of cost savings. Also, engagement with airport staff (including personnel at concessionaries) for feedback on innovations relating to environmental improvements, i.e. energy, water and waste management. For management of specialist waste streams tailored training may be appropriate (e.g. short tool-box talks, or specialist waste courses).
Landfill disposal	The Waste (England and Wales) Regulations 2011 require that generators of waste show that they have given due consideration to the waste management hierarchy before sending any waste generated to landfill. The Landfill Directive 1999 also requires that all wastes going for landfill must be pre-treated, unless treatment is not technically possible; or if treatment would not reduce the quantity or the hazards that it poses to human health or the environment.
London Luton Airport Limited Sustainability Strategy (2019)	Continue with waste management practices that minimise waste and optimise opportunities for recycling and recovery. Work with contractors, tenants and airlines to implement actions to deliver the following waste recycling and reduction targets: <ul style="list-style-type: none"> • Reduce operational waste to less than 0.12 kg/pax by 2025 • Recycle at least 70% of non-hazardous operational waste by 2022, and 100% of non-hazardous operational waste by 2031 • Continue diverting 100% of non-hazardous operational waste from landfill • Achieve the Carbon Trust Standard for Zero Waste to Landfill accreditation by the end of 2020 • All new concession contracts to include a requirement for zero single use plastics • Zero single use plastics to be provided within LLAOL facilities by 2027
Measuring and monitoring	Establish a baseline for total waste arisings and recycling rates to evaluate waste management performance for 19mppa, and identify strategic areas for improvement and targets. Carry out regular monitoring to determine progress on objectives and targets in the Sustainability Strategy with respect to waste. Carry out reviews of the airport's infrastructure to ensure that effective collection, segregation and secure storage of waste streams is maintained. Hold pre-emptive discussions with relevant waste contractors to ensure there are no restrictions in capacity at facilities for the onward transfer of the airport's waste.

4. Conclusion

This document provides an SWMP for the increase in passenger capacity at London Luton Airport to 19mppa. The SWMP is based on the most recent information available on waste arisings and procedures, and future objectives. It is considerate of regulatory requirements and national and local policies, including the *Luton Local Plan 2011–2031 (2017)*, and the *Minerals and Waste Local Plan (2014, for Bedford Borough, Central Bedfordshire and Luton Borough Council)*.

There are no expected changes to the type of activities generating waste, so operational waste for 19mppa is assumed to be of a similar character and derived from the same sources as existing waste arisings. The SWMP review estimates that proposals for 19mppa would result in operational waste arisings of 2,630 tonnes/annum. The assessment suggests that compared to 18mppa, an additional 1mppa would result an increase in operational waste arisings of between 56 to 138 tonnes/annum, or 2% to 6% (depending on the baseline used for passenger waste rates: i.e. the 2011 rate for the original 18mppa planning permission, or the most recent 2019 rate). This indicates that there would be a slight to moderate impact on total waste arisings under the 19mppa proposals, and minimal impact on the day-to-day management of operational waste, which is expected to be within the capacity of existing infrastructure at the airport. In addition, objectives for improved management and minimisation of waste at the airport are outlined in London Luton Airport's latest Sustainability Strategy, with targets to reduce passenger waste rates that should further reduce the impact of the 19mppa proposals on waste arisings.

To ensure effective management of operational waste associated with the increased passenger capacity, all possible care should be taken to follow the waste hierarchy, minimising waste arisings from the airport by optimising opportunities to reduce, reuse, recycle and recover waste materials. Actions for waste management good practice in-line with the waste hierarchy are outlined in the SWMP, including responsibilities under duty of care; appropriate segregation, storage and treatment of specific wastes; measuring and monitoring; and incorporation of waste targets from the LLAL Sustainability Strategy (2019). The actions proposed within the SWMP reinforce existing waste management procedures at London Luton Airport, ensuring the airport will continue to achieve targets for recycling and diverting waste from landfill, and providing the basis for the effective management of operational waste for 19mppa.

Appendix A

Regulatory and Policy Guidance References

Regulatory requirements relevant to a SWMP are presented in Table A.1.

Table A.1 Regulatory requirements

Regulation	Description
Controlled Waste (England and Wales) Regulations 2012 SI 811	Defines household, industrial and commercial waste for waste management licensing purposes.
The Controlled Waste (England and Wales) (Amendment) Regulations 2012	<p>States that household, industrial and commercial waste are classed as controlled waste and are subject to the Environmental Protection Act 1990. The Controlled Waste Regulations 2012 (CWR 2012) continues to define waste into the categories household waste, commercial waste and industrial waste but it has separate means of classification:</p> <ul style="list-style-type: none"> • By the place of production; and • By the nature of the waste or the activity producing the waste. <p>CWR 2012 defines “clinical waste” and introduces the term “offensive waste”.</p> <p>The amendment introduces disposal charges to some non-domestic household waste producers and some premises formerly classified as producers of household waste are now identified as producers of commercial waste.</p>
Environmental Protection Act 1990	The Environmental Protection Act 1990 (initialism: EPA) as of 2008 defines, within England and Wales and Scotland, the fundamental structure and authority for waste management and control of emissions into the environment.
Landfill Directive (1999/31/EC)	Requires reductions in the quantity of biodegradable waste that is landfilled, and encourages diversion of non-recyclable and non-usable waste to other methods of treatment.
Waste Duty of Care Code of Practice 2018	<p>The duty of care legislation makes provision for the safe management of waste to protect human health and the environment. This code of practice is issued under section 34 of the Environmental Protection Act 1990 (the EPA) and sets out how to meet waste duty of care requirements. This includes requirements to:</p> <ul style="list-style-type: none"> • Prevent unauthorised or harmful deposit, treatment or disposal of waste; • Prevent a breach (failure) by any other person to meet the requirement to have an environmental permit, or a breach of a permit condition; • Prevent the escape of waste from your control; • Ensure that any person you transfer the waste to has the correct authorisation; and • Provide an accurate description of the waste when it is transferred to another person.
Environmental Permitting (England and Wales) Regulations 2016 SI 1154	Exempts certain waste operations where an environmental permit is not required.
Revised EU Waste Framework Directive (2008/98/EC) (WFD)	Provides overarching legislative framework for the collection, transport, recovery and disposal of waste, and includes a common definition of waste. Waste classification is based on the European List of Waste (LoW) (Commission Decision 2000/532/EC); and Annex III to Directive 2008/98/EC. The aim of the revised WFD is to promote waste prevention, increase recycling and ensure better use of resources, whilst protecting human health and the environment.
Waste (England and Wales) Regulations 2011	Transposes the WFD into law resulting in a number of changes to waste management, as listed in Environment Agency guidance on the Waste Regulations, including:

Regulation	Description
	<ul style="list-style-type: none"> • Placing greater emphasis on the waste hierarchy to encourage more waste prevention, re-use and recycling. The hierarchy will have to be applied by businesses transferring waste and by environmental permit holders whose operations generate waste; • Some amendment to obligations under duty of care to take account of the waste hierarchy, such as a declaration on transfer notes and hazardous waste consignment notes; • Introducing a two-tier carrier and broker registration system, including an obligation on waste producers carrying their own (non- construction/demolition) waste to register by end of 2013; and • Minor amendments to the assessment of hazardous waste and to the consignment note procedures and record keeping requirements.
Waste (England and Wales) (Amendment) Regulations 2012	<p>Came into force on 1 October 2012. The amended Regulations relate to the separate collection of waste and amend the Waste (England and Wales) Regulations 2011 by replacing regulation 13 (Duties in relation to collection of waste).</p> <p>Places duties on collections of waste to collect four key materials (waste, paper, metal, plastic or glass) separately, and to keep these materials separate from other waste or other material with different properties.</p>
Waste Electrical and Electronic Equipment (WEEE) Directive (2012/96/EC)	<p>The EU WEEE Directive 2012 regulates the management of electrical and electronic waste. It is applied in the UK by the WEEE Regulations 2013. Extended responsibility is placed on producers and distributors of electrical and electronic equipment. Under the extended responsibility obligations, producers are required to finance the collection, treatment and recovery of WEEE. Waste prevention refers to measures to reduce the quantity and harmfulness of WEEE and materials and substances contained therein – the most preferred option is waste prevention followed by reuse, recycling and recovery.</p>
The Waste Electrical and Electronic Equipment Regulations 2013	<p>Implements the principle of "extended producer responsibility" which requires producers of electrical and electronic equipment (EEE) to finance the collection, treatment and recovery of waste electrical and electronic equipment (WEEE).</p> <ul style="list-style-type: none"> • Sets target levels for recovery and reuse of WEEE; • Provides treatment standards for WEEE; and • Provides separate collection of WEEE.
Hazardous Waste (England and Wales) Regulations 2005 SI 2005/894	<p>These regulations revoked the previous Special Waste Regulations 1996.</p> <p>The key requirements are as follows:</p> <ul style="list-style-type: none"> • The list of Hazardous Wastes will be defined by the European Waste Catalogue under the List of Wastes Regulations 2005; • Each hazardous waste producing site – unless exempt – must be required to be pre-registered with the Environment Agency before waste can be collected; • Consignees (hazardous waste receivers) must keep records of all consignments received and submit quarterly returns to the EA together with a fee per consignment; • Sites that are registered will be subject to EA inspection and monitoring; • The mixing of hazardous waste with other hazardous waste types and non-hazardous waste is prohibited; • All hazardous waste entering hazardous waste landfill sites and cells must also comply with the Waste Acceptance Criteria; and • Hazardous wastes will need to be sampled and tested in order to produce analysis results that can be used to determine whether a waste complies with WAC and can therefore continue to be landfilled.
Hazardous Waste (England and Wales) (Amendment) Regulations 2016 SI 2016/336	<p>Changes made to the Hazardous Waste (England and Wales) Regulations SI 2005/894 came into force on 1 April 2016. The key changes include:</p> <ul style="list-style-type: none"> • Hazardous waste producers will no longer need to notify their premises with the Environment Agency; • A change in the unique consignment note code which appears on every consignment note; • Those who produce or store more than 500kg or more of hazardous waste per year will no longer need to register their premises with the Environment Agency;

Regulation	Description
	<ul style="list-style-type: none"> The format of the consignment note will also change to accommodate the removal of premises registration, regardless of the amount of hazardous waste you produce, store or handle; If waste is produced in England, the first six characters of the consignment note code which currently represent the premises registration number, will be replaced by the first six letters or numbers of the business name; and A final change involves the requirement for the SIC code on the consignment note. From 1 April 2016 SIC 2007 must be specified, but the use of NACE codes will continue to be allowed.
COSHH Regulations 2002	The occupational use of nanomaterials is regulated under the Control of Substances Hazardous to Health (COSHH). COSHH is the law that requires employers to control substances that are hazardous to health and includes nanomaterials.
Control of Pollution (Oil Storage) (England) Regulations 2001	<p>These Regulations define oils as any kind of oil and includes petrol, synthetic and vegetable oils. The Regulations include provisions on:</p> <ul style="list-style-type: none"> Correct primary and secondary storage preventing oil which is no longer in its container from escaping from the place where it is stored. Disposal requirements; and Dealing with spills. <p>Further detailed in guidance Safe Storage and disposal of used oils: PPG8</p>
Waste Batteries and Accumulators Regulations 2009 SI 890 (as amended)	Establishes a legal framework and schemes for collecting, treating and recycling portable, industrial and vehicle batteries. Applies to all types of batteries except when used for military and space equipment.
Producer Responsibility Obligations (Packaging Waste) Regulations 2007	The 2007 Regulations consolidate previous versions of the producer responsibility regulations and apply to all parts of the United Kingdom. The Regulations apply to businesses with over £2 million annual turnover and who handle more than 50 tonnes of packaging per annum. Businesses can carry out obligations either through the individual route or by joining a registered compliance scheme.
The Environment Bill (Draft Bill 9-58/1)	<p>The Environment Bill (Draft) is currently proceeding through Parliament but has not been adopted yet, so precise details may be subject to change.</p> <p>The Environment Bill makes provision for targets, plans and policies to provide stronger protection for the environment, include measures relating to waste and resource efficiency. With respect to waste management a key aspect of the Environment Bill is the extension of existing duties included in the Waste (England and Wales) Regulations 2011 for the separate collection of recyclable materials, to cover food waste and the need for food waste to be separated from other recyclables (including mixed recyclables). Further provisions are also proposed in the Environment Bill with respect to producer responsibility for products, which may have a bearing on waste management in terms of packaging waste, deposit return schemes and information regarding options for the recycling of products at end of life.</p>

Policies relevant to a SWMP are presented in **Table A.2**.

Table A.2 Policies and their relevance

Policy	Description
National planning policies:	
National Planning Policy Framework (NPPF) (2019)	The NPPF sets out the Government's planning policies for England and how they should be applied to developments. The NPPF states that the planning system should "contribute to the achievement of sustainable development" and that in order to achieve it the planning system must be aligned to economic, social and environmental sustainability which should be pursued jointly. The environmental

Policy	Description
	objective specifically includes "minimising waste and pollution". The NPPF should be read in conjunction with the Government's planning policy for waste.
Waste Management Plan for England (Dec 2013)	The Waste Management Plan for England (WMPE 2013) provides an overview of waste management in England and fulfils the mandatory requirement in Article 28 of the revised Waste Framework Directive for Member States to adopt waste management plans and waste prevention programmes.
Waste Management Plan for England (Aug 2020)	Under the Waste (England and Wales) Regulations 2011 the Government is required to review the Waste Management Plan for England every 6 years. The revised draft Waste Management Plan for England (WMPE 2020) was published in August 2020 to supersede WMPE 2013; the Government is seeking views on WMPE 2020 via a consultation due to close in Oct 2020. WMPE 2020 provides an analysis of the current waste management situation in England, which is primarily about the quantity of waste there is in England and how that waste is managed. WMPE 2020 sets out a summary of current policies, reflecting the policies included in the Government's Resources and Waste Strategy, published in 2018.
National Planning Policy for Waste (October 2014)	<p>The National Planning Policy for Waste (NPPW) refers to the Government's ambition to work towards a more sustainable and efficient approach to resource use and management, identifying opportunities for improvements through driving waste management up the waste hierarchy. The NPPW also states that <i>"when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:</i></p> <ul style="list-style-type: none"> <i>• The likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and / or the efficient operation of such facilities;</i> <i>• New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service; and</i> <i>• The handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal."</i>
Our Waste, Our Resources: A Strategy for England (2018)	<p>The Government's Resources and Waste Strategy sets out plans to improve use of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. Proposed strategies include:</p> <ul style="list-style-type: none"> <i>• "Improving recycling rates by ensuring a consistent set of dry recyclable materials is collected from all households and businesses; and</i> <i>• Work to align the National Planning Policy for Waste and planning practice guidance with the Resources and Waste Strategy and continue to maintain building regulations guidance to support its objectives."</i> <p>In August 2020, the Government published their approach to monitoring and evaluating the progress of the Resources and Waste Strategy. The Resources and Waste Strategy: Evaluation Plan (2020) sets out the provisions for evaluating the impact of the policies described in the Strategy, describing the high level principles, quality assurance mechanisms and approaches for conducting evaluations across the Strategy, and a framework of key performance indicators. The Resources and Waste Strategy: Monitoring Progress (2020) provides the basis for monitoring progress of key Strategy policies that are in the process of being implemented; going forward the Government aim to provide annual updates of Monitoring Progress to summarise the latest trends in the performance data.</p>
Local planning policies:	
Luton Local Plan 2011–2031 (2017)	The Luton Local Plan (2011–2031) sets out policies and strategic objectives for environmental, social and economic aspects to be considered in the assessment of local development and planning applications. With respect to waste the Luton Local Plan builds on, and makes reference to, a number of earlier local policy documents, including the Bedfordshire and Luton Minerals and Waste Local Plan (2005); the Minerals and Waste Local Plan (2014); and Managing Waste in New Developments – Supplementary Planning Document (2006). In some instances the Luton Local Plan identifies that previous waste policies have been replaced (i.e. Luton Local Plan Policy LLP37 replaces the following policies in the Bedfordshire and Luton Minerals and Waste Local Plan (2005): W4: Waste minimisation, and W5: Management of wastes at source: waste audits). The following policies and objectives in the Luton Local Plan are relevant to waste management in development proposals:

Policy	Description
	<ul style="list-style-type: none"> • <i>Policy LLP37 Climate change, carbon and waste reduction and sustainable energy – Waste: The Council encourages an overall reduction in the amount of waste generated, treated and disposed of to reduce the need for land for waste management. Proposals that are likely to generate significant volumes of waste through development or operational phases will be required to include a waste audit as part of the application.</i> • <i>Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.</i> • <i>Sustainable Energy – Policy approach</i> <ul style="list-style-type: none"> • <i>Para 11.55: Reducing the need for primary materials, reusing and recycling can save money and lead to better resource efficiency. The earlier this is considered in any planned development, the greater and more achievable the options are. In turn, this should lead to more sustainable development being designed and built. The detailed benefits of this approach are described in more detail in the supplementary planning document, 'Managing Waste in New Developments'</i> • <i>Pollution and Contamination – Policy approach</i> <ul style="list-style-type: none"> • <i>Para 11.62: Government policy requires development plans to include policies to minimise waste and pollution.</i> • <i>Para 11.63: The planning authority should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</i>
Minerals and Waste Local Plan: Strategic Sites and Policies (2014) Bedford Borough, Central Bedfordshire and Luton Borough Council	<p>The Minerals and Waste Local Plan (2014) covers a number of local policies relating to strategic waste management in the local area, waste facilities and other developments.</p> <ul style="list-style-type: none"> • <i>Waste Strategic Policy WSP 1 – The Provision of Recovery and Disposal Capacity.</i> <ul style="list-style-type: none"> • <i>Sufficient capacity for the recovery of waste from the Plan area, and for the landfilling of wastes including pre-treated residual waste from London, will be provided in order to enable the following targets for diversion from landfill and recovery to be achieved:</i> <ul style="list-style-type: none"> - <i>Recovery of at least 50% of municipal solid wastes by 2013, 70% by 2015, and 75% by 2020.</i> - <i>Recovery of at least 72% of commercial and industrial wastes by 2013, and 75% by 2015.</i> • <i>The targets set out in policy WSP1 set minimum levels of recovery (as defined in Directive 2008/98/EC) for both public sector and business sector wastes at the date of the adoption of the Plan, and two years thereafter, and it is hoped that these targets will be exceeded in practice. The key targets expressed in this policy repeat those set out at policy WM2 of the East of England Plan published in 2008, and the Waste Strategy for England 2007.</i> • <i>Waste Strategic Policy WSP 5 - Including waste management in new built developments</i> <ul style="list-style-type: none"> • <i>All new developments should include sufficient and appropriate waste storage and recovery facilities in their design and layout.</i> • <i>The provision of facilities for the separate collection and storage of wastes within all developments enables a greater proportion of waste arisings to be diverted from landfill, and to be separated for reuse. This applies to all new built developments: factories and employment sites, housing, offices, commercial space, and public buildings. A Supplementary Planning Document (SPD) 'Managing Waste in New Developments', was adopted in 2006. It is important that the SPD is taken into account from the conception stage, when developers design new buildings, regardless of the intended end use, so that the occupiers of all new buildings are able to contribute to the move to a materials reusing economy.</i>
Managing Waste in New Developments – Supplementary Planning Document Bedfordshire and	<p>This supplementary planning document (SPD) is referenced in the Luton Local Plan (2017) in the context of resource efficiency and waste management in planned developments. The overall aim of the SPD is to provide guidance on sustainable waste for new developments including waste audits, however some of the principles may be relevant to all developments. The SPD itself makes reference to superseded policies in the Bedfordshire and Luton Waste Local Plan 2005 (i.e. policy W5 and W6).</p>

Policy	Description
Luton Waste Local Plan 2005 (April 2006)	<ul style="list-style-type: none"> A number of key objectives have been identified which are set out below. <ul style="list-style-type: none"> To offer practical guidance to those involved in the development process to reduce, reuse and recycle waste. To influence the design of new development: <ul style="list-style-type: none"> To allow an efficient and effective waste management service to be provided. To enable all occupiers to have the best opportunities to reduce, reuse and recycle waste. To improve skills in sustainable waste management by raising awareness and applying best practice. <u>Waste Audits:</u> Under Policy W5 of the WLP "proposals that are likely to generate significant volumes of waste ... will be required to include a waste audit as part of the application." "A waste audit is a written document which shows how opportunities for the reduction, recycling and re-use of waste during the construction and occupation of the development will be taken account of." <u>When is it required?:</u> The principles of sustainable waste management practice should apply to all developments. This includes new buildings and engineering operations, change of use, refurbishment and conversion. It is recognised however that waste auditing will only be required for new developments. It is also true that the larger developments will tend to have greater implications for using resources and generating waste. However the cumulative impact of a large number of small developments can also be significant.
Bedfordshire and Luton Waste Local Plan (2005)	<p>The following policies relating waste were included in the Bedfordshire and Luton Waste Local Plan (2005) but have been superseded by subsequent plans, including policies and objectives in the Luton Local Plan (2011-2031):</p> <ul style="list-style-type: none"> W4 Waste minimisation: <ul style="list-style-type: none"> The WPA (Waste Planning Authority) will actively encourage an overall reduction in the amount of waste generated and thus reduce the need for land for waste management, wherever waste is generated, treated or disposed of within the plan area. W5 Management of wastes at source – Waste Audits: <ul style="list-style-type: none"> Proposals that are likely to generate significant volumes of waste through the development or operational phases will be required to include a waste audit as part of the application. This audit should demonstrate that in both construction and operational phases of a proposed development, waste will be minimised as far as possible and that such waste as is generated will be managed in an appropriate manner in accordance with the Waste Hierarchy. Before granting planning permission, the LPA will need to be satisfied that the measures identified in the waste audit represent appropriate waste management solutions in light of the Waste Hierarchy. Where appropriate, the LPA may require additional waste management measures in order to facilitate the movement of waste management up the Hierarchy.

