

30/08/2013

Dan Phillips  
Eight Associates  
81 Southwark Street  
London SE1 0HX

Dear Dan

RE: Basement Development in RBKC; BREEAM Domestic Refurbishment Issue WAS2 and Spoil

We spoke by telephone ten days ago on this matter, subsequent to previous conversations I have had with your colleagues Cyril and JP.

This letter is to formalise my enquiry on behalf of Simon Haslam of Basement Force, who has engaged us to look into this aspect of compliance with the forthcoming BREEAM Domestic Refurbishment (BDR); specifically BDR Issue Was2 – Refurbishment Site Waste Management.

As you know, under BDR rules the BRE require inert excavated ground (spoil) to be classified as ‘Construction Waste’, which must be dealt with in accordance with the standard criteria for BDR Issue WAS2 (Construction Site Waste). I am assuming that all subterranean developments would have a construction cost (labour and materials, contract sum only) of over £300K excluding VAT.

Under EcoHomes rules ‘spoil’ was not assessed. But the RBKC proposal to require an 80% score under the Waste Category for Subterranean developments renders the BDR spoil classification important for a number of reasons:

- the 80% score for the Waste Category must be gained from
  - 1 credit for compliant recycling facilities on site
  - 1 credit for a compliant composting regime on site or by Council collection, including kitchen waste
  - up to 3 credits for a compliant Site Waste Management Plan (SWMP) and meeting increasing waste benchmarks
  - 1 credit for exemplary performance;
- the use of the Exemplary Was2 credit within the 80%, or its use as an ‘addition’ to it in order to make up the score, requires clarification by RBKC:
  - how is the formula for the 80% anticipated;
    - as 80% of the ‘normal’ Waste Category credits [Was1 (1 credit) plus Was2 (3 credits)] – total 4 credits?
    - or as 80% of all possible Waste Category credits [Was1 (1 credit) plus Was2 (3 credits) plus Was2 Exemplary (1 credit)] – total 5 credits?
- not all sites can comply with the criteria for the composting credit, such as mews properties with no or limited external space. For such sites the 80% score would we presume require:
  - Level 2 SWMP and maximum waste of 17.32m<sup>3</sup> (or 8.78 tonnes) per £100K
  - and >80% construction waste diversion (from landfill)
  - and >85% demolition waste diversion (from landfill);

- Typical basement spoil in RBKC is likely to be Brown Clay, which has limited re-use potential in quarry filling and golf course landscaping. These uses would comply with BDR rules for diversion from landfill, but they do not have infinite capacity. Therefore this re-use of spoil will be curtailed when quarries and golf courses are 'full'. What happens then; will the 80% rule be relaxed?
- As spoil re-use on projects near London cannot be guaranteed, there would appear to be future potential for spoil to be transported great distances in order to be diverted from landfill. Spoil transportation over long distances would run contrary to the environmental intention of BREEAM;
- Sands, gravels and blue clays all have recycle and resale uses and therefore should not pose a re-use problem.

Your thoughts and considered feedback, followed by direction RBKC, will be appreciated. But in the meantime please feel free to call me and discuss this as you wish.

Kind regards,

JULIAN WILLIAMS

CC Simon Haslam, Basement Force  
Penelope Tollitt, RBKC  
Preeti Gulati Tyagi, RBKC