

ASHBY FARM, DUCKS HILL ROAD, NORTHWOOD OPERATIONAL WASTE MANAGEMENT STRATEGY

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Prepared By	Richard Botting	26/02/26
Reviewed By	Oliver James	26/02/26
Authorised By	Peter Hambling	26/02/26

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1 INTRODUCTION

1.1 PROJECT BACKGROUND

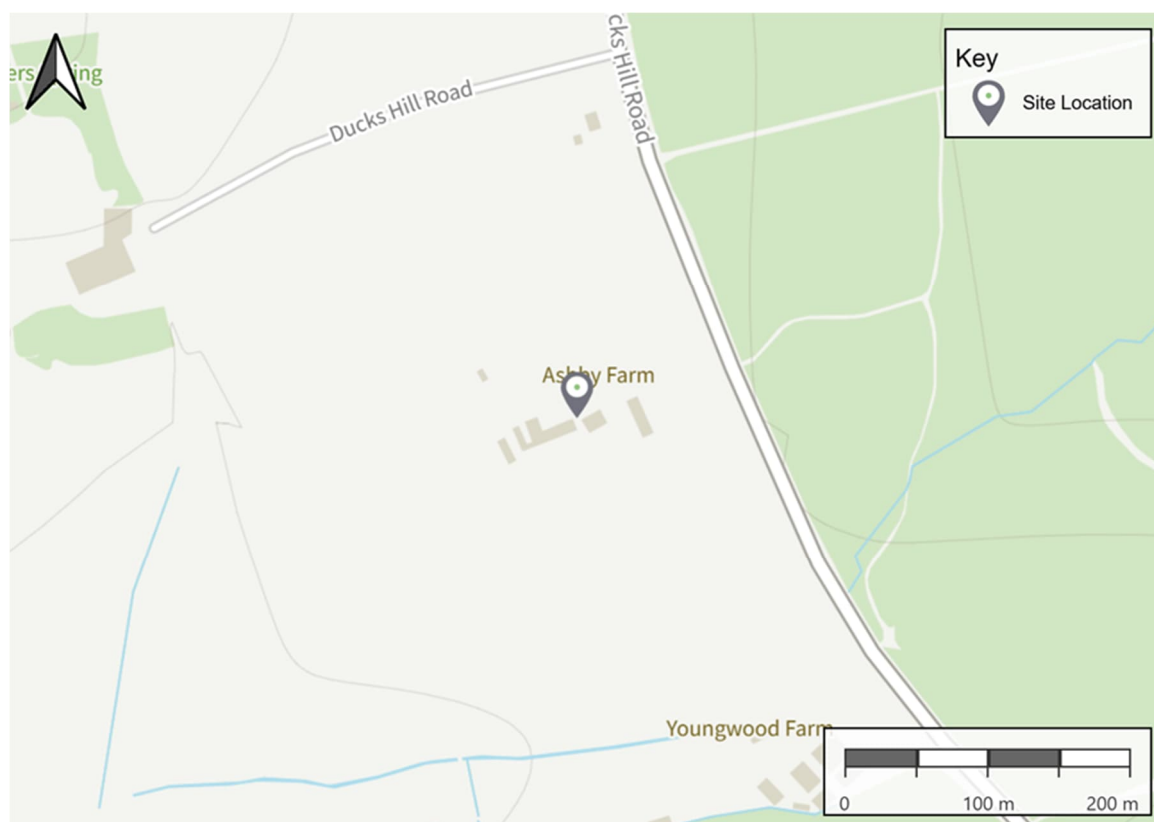
1.1.1 This Operational Waste Management Strategy (OWMS) has been prepared by Velocity Transport Planning, on behalf of Holland and Holland to support a planning application for the development at Ashby Farm, Ducks Hill Road, Northwood, HA6 2SS (hereafter referred to as the 'Proposed Development'). The local planning authority is the London Borough of Hillingdon (LBH).

1.1.2 This OWMS considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage and collection of waste arising.

1.2 SITE LOCATION

1.2.1 The site is located off the A4180, Ducks Hill Road between Ruislip and Northwood. The site location is shown in Figure 1-1 below.

Figure 1-1 Site Location



1.3 SITE DESCRIPTION

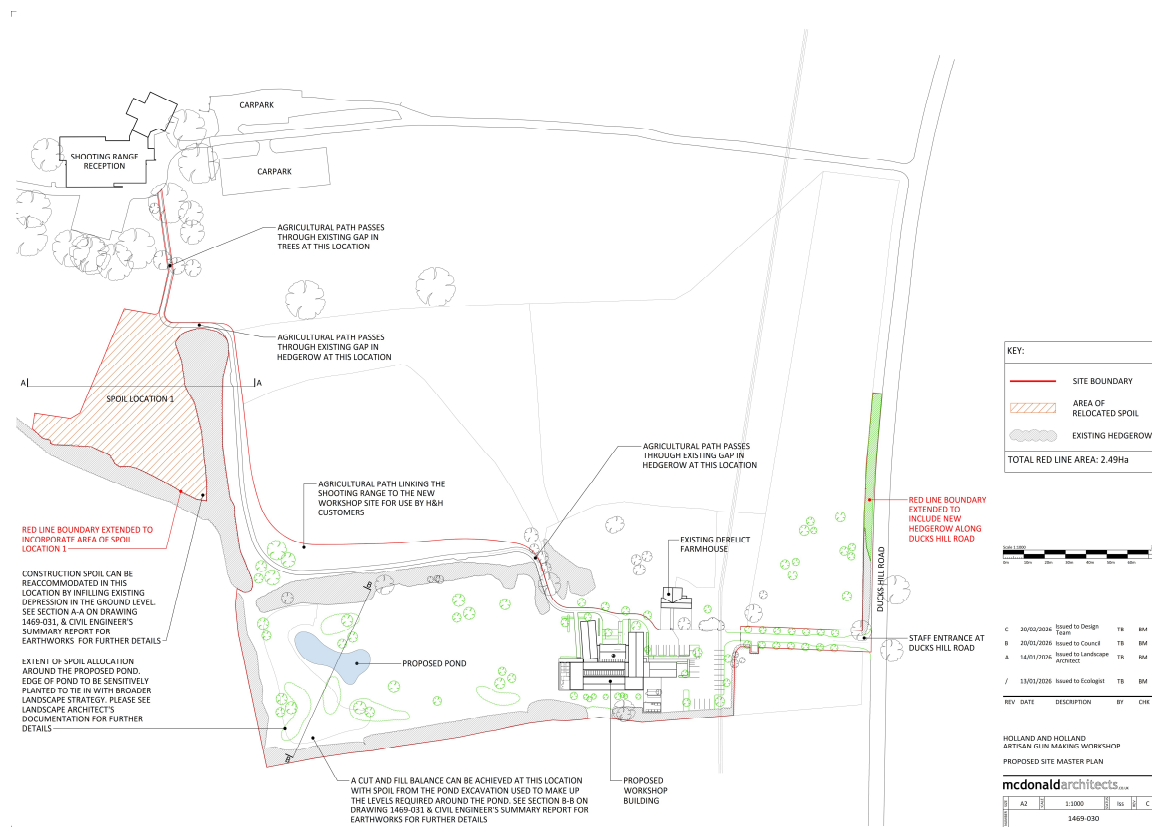
1.3.1 The Proposed Development is currently an agricultural farm and equestrian centre with a range of stables, farm buildings and temporary structures.

1.3.2 One existing derelict domestic property stands to the north of the proposed development.



- 1.3.3 The farmyard appears mainly flat and of an un-metalled surface.
- 1.3.4 Figure 1-2 shows the red line boundary of the Proposed Development.

Figure 1-2 Planning Application Red Line Boundary



1.4 PROPOSED DEVELOPMENT

- 1.4.1 The Proposed Development is described as follows:

“Demolition of the existing site buildings (with central timber framed barn retained), removal of existing hardstanding and menage area and the redevelopment of the site to provide a new high quality workshop facility including associated access improvements, parking, hard and soft landscaping, sustainable drainage and ecological enhancements.”

1.5 DOCUMENT STRUCTURE

- 1.5.1 The report is set out in the following format:

- Section 2: Waste Legislation, Policy and Guidance – details of the national legislation and local waste policy that have relevance to the Proposed Development.
- Section 4: Management of Commercial Waste – provides an estimate of commercial waste arising and outlines the plan which will be adopted to manage the waste arising from the Proposed Development once operational.
- Section 5: Summary & Conclusions
- Appendix A: National and Local Waste Policy & Guidance



⦿ Appendix B: Swept Path Analysis



2 WASTE LEGISLATION, POLICY & GUIDANCE

2.1 INTRODUCTION

- 2.1.1 The UK is no longer a member of the European Union. EU legislation as it applied to the UK on 31 December 2020 is now incorporated into UK domestic legislation.
- 2.1.2 This section focuses on the details of the national legislation that are relevant to the Proposed Development, in addition to waste policy and guidance at a local level, reviewed as part of the preparation of this OWMS.

2.2 NATIONAL LEGISLATION

- 2.2.1 A list of relevant items of national waste legislation is outlined below in reverse chronological order:
- 2.2.2 The Separation of Waste (England) Regulations 2025 – These regulations came into force on 31 March 2025, revising how household and commercial recyclable and organic waste is managed. They introduce exemptions under the Environmental Protection Act 1990 so that waste collection authorities may collect metal, glass, and plastic together, and for households, food waste and garden waste together, without needing to satisfy the usual justification tests. Businesses defined as micro-firms (fewer than 10 full-time equivalent employees) are exempt from the stricter separation requirements until 31 March 2027.
- 2.2.3 The Waste (Circular Economy) (Amendment) Regulations (2020) – these regulations came into force on 1 October 2020 and amended a raft of primary and secondary legislation on waste, to introduce a revised legislative framework to support the EU's Circular Economy Package (CEP) identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.
- 2.2.4 Waste Management, The Duty of Care Code of Practice (2018 update) - This code of practices replaces the 1996 Code and is pursuant to Section 34(9) of the Environmental Protection Act 1990. It sets out practical guidance on how to meet waste duty of care requirements and is admissible as evidence in legal proceedings i.e. its rules will be taken into account where relevant in any case based on breach of the duty of care.
- 2.2.5 The Waste (England and Wales) Regulations 2011 - Waste collection authorities must collect waste paper, metal, plastic, and glass separately. This legislation also imposes a duty on waste collection authorities, from the date, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
- 2.2.6 Environmental Protection Act 1990 - Part II of the act was originally implemented by the Duty of Care Regulations 1991.

2.3 NATIONAL, LONDON & LOCAL WASTE POLICY

- 2.3.1 The relevant national, London and local waste policy reviewed during the preparation of this Waste Management Strategy is outlined below and further detail is provided in APPENDIX A.
- ⦿ Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (2024)*;
 - ⦿ Department for Communities & Local Government (DCLG), *National Planning Policy for Waste (2014)*;



- ⦿ Department for Environment, Food and Rural Affairs (DEFRA), *Our Waste, Our Resources: A Strategy for England* (2018);
- ⦿ DEFRA, *Waste Management Plan for England* (2021);
- ⦿ HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment* (2018);
- ⦿ Greater London Authority (GLA), *The London Plan 2021* (March 2021);
- ⦿ GLA, *London Environment Strategy* (2018);
- ⦿ GLA, *Circular Economy Statements* (2022)
- ⦿ West London Waste Authority (WLWA), *West London Waste Plan* (2015);
- ⦿ LBH, *Hillingdon Local Plan (Part 1) – Strategic Policies* (2012); and
- ⦿ LBH, *Hillingdon Local Plan (Part 2)* (September 2020).

2.4 CIRCULAR ECONOMY CONSIDERATIONS

MANAGEMENT OF MUNICIPAL WASTE

- 2.4.1 Once operational, commercial waste will be managed in accordance with the waste hierarchy.
- 2.4.2 The London Plan Policy SI 7 indicates the target of at least 65% of any municipal waste to be recycled by 2030, and no biodegradable or recyclable waste to be disposed of to the landfill by 2026.
- 2.4.3 The target set in the London Environment Strategy which expects 75% business waste recycling by 2030 will be targeted.
- 2.4.4 Commercial waste recycling rates are calculated based on the metrics provided by BS5906:2005 *Waste Management in Buildings – Code of Practice*, while facilities have been designed in accordance with LBH requirements stated in their guidance. The waste store is designed to allow the operator to meet the relevant recycling rate targets.
- 2.4.5 Commercial waste streams will include:
- ⦿ Residual waste;
 - ⦿ Dry Mixed Recycling (DMR);
 - ⦿ Food waste;
 - ⦿ Waste Electrical and Electronic Equipment (WEEE); and
 - ⦿ Special waste.
- 2.4.6 Currently most commercial contractors do not segregate DMR into individual waste streams (card, paper, mixed plastics, or metals) and it is assumed that these materials will be collected as a co-mingled waste stream.
- 2.4.7 It is assumed that as part of the procurement process, a zero waste to landfill collection contract will be sought for the residual waste.
- 2.4.8 A total of 79 tonnes of municipal waste is estimated to be generated by the Proposed Development per annum once operational based on the storage capacity and proposed collection frequencies.
- 2.4.9 It is anticipated that the volume of waste generated will be significantly less than estimated as the calculation assumes 100% fill levels of all containers on site.



2.4.10 Individual waste streams will be transported to suitably licensed facilities for processing at a Materials Recycling Facility (MRF), Energy from Waste (EfW) or Anaerobic Digestion (AD) facility or bulking and onward transfer at a Waste Transfer Station (WTS).

2.4.11 Table 2-1 below details the facilities that may be used for the management of commercial waste.

Table 2-1 Commercial Waste Disposal Facilities

Contractor	Facility Type	Permit Number	Address	Contact	Distance (Miles)	EWC Codes
West London Waste Authority	Rail Transfer	AB3605FM	Victoria Road, Ruislip, HA4 0YS	020 8841 4546	4	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry - Mixed Municipal Waste (03 01)
Biffa	MRF	EPR/UP3232AC	Unit 2, Aztec 12 406 Ardra Road, Edmonton Enfield N9 0BD	0800 307307	27	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry – Paper and Cardboard (01 01) Glass (01 02) Plastics (01 39) Metals (01 40)
Severn Trent Green Power	AD	EPR/MP3934QN/V004	North London AD Facility Coursers Farm Colney Heath Hertfordshire AL4 0PG	01608 677700	19	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry – Biodegradable Kitchen and Canteen Waste (01 08)

2.4.12 Table 2-2 below details the licensed waste facilities that could accept the commercial waste generated by the Proposed Development.

Table 2-2 Local Licensed Waste Facilities

Contractor	Facility Type	Permit Number	Address	Contact	Distance (Miles)	EWC Codes
South East London Combined Heat & Power Ltd	EfW	NP3738SY	The Kennels Site, Landmann Way, Lewisham, London, SE14 5RS	0203 567 6162	25	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry - Mixed Municipal Waste (03 01)
London Energy Ltd	EfW	LB3301HL	Edmonton Ecopark, Advent Way, Edmonton, London, N18 3AG	0207 000 9595	21	
Grundon Waste Management Limited	EfW	BT2866IG	Grundon Waste Management Ltd, Lakeside Road, Colnbrook, Slough, Buckinghamshire, SL3 0EG	01753 688430	12	
Biffa Waste Management North London	MRF / WTS	HP3098EW	Unit 2, 12 Ardra Road, Enfield, London N9 0BD	0800 307 307	27	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry – Paper and Cardboard (01 01)
London Waste Management	EfW	CBDU308350	6 Stockley Park, 9 The Square, Hayes, UB11 1FW	0203 097 1517	8	Glass (01 02) Plastics (01 39) Metals (01 40)
Refood Ltd	AD	AP3938EJ	London Sustainable Industries Park, Choats Rd, Barking, Dagenham RM9 6LF	0800 011 3214	27	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry – Biodegradable Kitchen and Canteen Waste (01 08)
Severn Trent Green Power South Mimms Composting Facility	AD	LP3334DC	Ridge, Potters Bar EN6 3NA	0203 887 5345	15	



OPERATIONAL WASTE REPORTING

- 2.4.13 The developer will be contractually responsible for all operational waste reporting for the Proposed Development. This reporting will be based either on number of container lifts per waste stream, or collection weight data if available. Data requirements and reporting methods will be agreed with the relevant authorities once all elements are occupied.
- 2.4.14 All waste movements will be undertaken in accordance with the Duty of Care requirements.

SMART LOGISTICS & WASTE MINIMISATION

- 2.4.15 The building operator will be encouraged to engage with suppliers to minimise waste packaging and single use items, as well as promote the waste hierarchy to users of the building.
- 2.4.16 The building management team will be expected to engage with the staff upon occupation, to ensure they are aware of how to minimise their waste. These measures could include, how to reduce avoidable food waste, and minimising the use of single use items.
- 2.4.17 It is anticipated community-led waste minimising initiatives will be encouraged. This includes partnering with organisations that can redistribute unused items or furniture directly from their premises, including:
- ◉ Warp-it;
 - ◉ Collectco; and
 - ◉ Reuse Network.

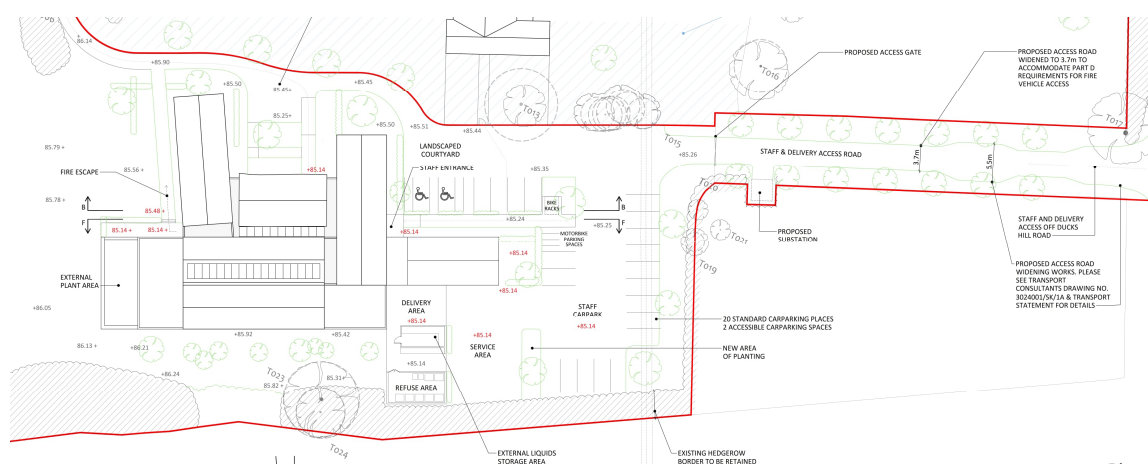


3 MANAGEMENT OF COMMERCIAL WASTE

3.1 INTRODUCTION

- 3.1.1 This section outlines the proposed strategy that will be used to manage the operational waste arising from the Proposed Development, which will comprise of a gun making and showroom facility.
- 3.1.2 This strategy has been developed in accordance with standards detailed in BS5906:2005 *Waste Management in Buildings – Code of Practice* and information received from Waste Officers of LBH (hereafter collectively referred to as ‘the Guidance’).
- 3.1.3 The detailed layout for the proposed facility is as shown in Figure 3-1 below.

Figure 3-1 Gun Making Facility Detailed Ground Floor Layout



3.2 WASTE GENERATION MODELLING

COMMERCIAL WASTE

- 3.2.1 LBH does not provide metrics for commercial waste generation. Waste generation metrics for the proposed production facility has been sourced from British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice*.
- 3.2.2 Table 3-1 below details commercial waste metrics for the Proposed Development.

Table 3-1 Commercial Waste Metrics

Description	Weekly Waste Metric	Waste Composition
Industrial Unit	volume arising per m ² of floor area (5l) × floor area	<ul style="list-style-type: none"> 25% Residual Waste 70% DMR 5% Food Waste

- 3.2.3 Waste composition has been designated in accordance with the GLA target of 75% business waste recycling rate by 2030.
- 3.2.4 Table 3-2 shows the commercial area schedule for the spaces within the Proposed Development.



Table 3-2 Commercial Area Schedule

Premise	Use	Area (GIA)
Gun Making Facility	Production and Showroom	1,416m ²

- 3.2.5 Applying the waste metrics in Table 3-1 to the commercial area schedule in Table 3-2, Table 3-3 below summarises the estimated weekly commercial waste arisings for the Proposed Development.

Table 3-3 Estimated Weekly Commercial Waste Generation

Premise	Residual Waste	Weekly Waste Generation (Litres)		Total
		DMR	Food Waste	
Gun Making Facility	1,770	4,956	354	7,080

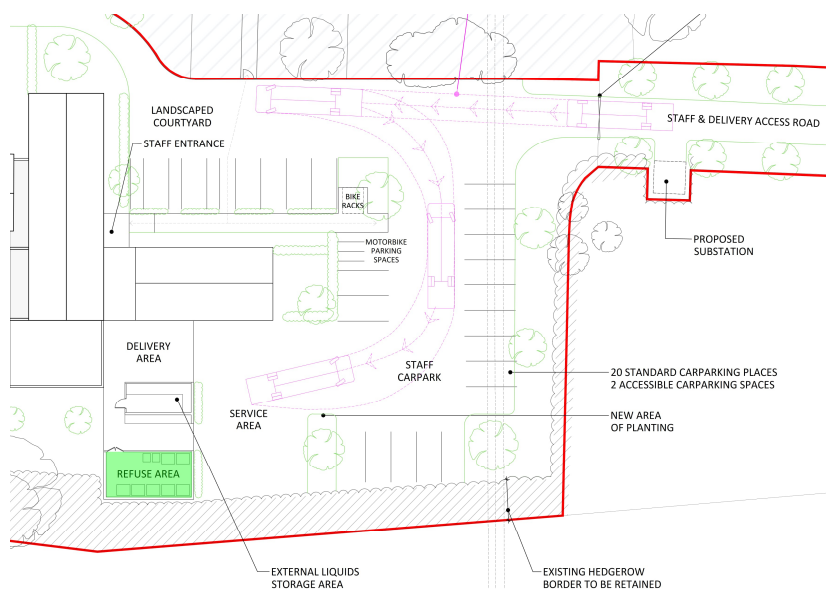
3.3 PROPOSED WASTE MANAGEMENT STRATEGY

- 3.3.1 The proposed strategy to manage commercial waste has been devised to provide a high-quality service to the occupiers whilst also being compliant with the Guidance.

COMMERCIAL WASTE STORAGE

- 3.3.1 Temporary internal waste storage will be provided within the building to allow staff to segregate waste at source.
- 3.3.2 The on-site Facilities Management (FM) team will transfer the segregated waste from the temporary internal waste storage to the commercial waste store.
- 3.3.3 The commercial waste store is located adjacent to the Service Area and is set away from the Workshop Perimeter (for safety purposes).
- 3.3.4 Figure 3-2 below shows the location and configuration of the commercial waste store (in green).

Figure 3-2 Waste Store Location



WASTE STORAGE PROVISION

3.3.5 As per the Guidance, the waste storage facilities must include provisions for the segregation of waste streams.

3.3.6 Residual waste and DMR will be stored in 1,100-litre Eurobins as shown in Figure 3-3 below.

Figure 3-3 Example 1,100-Litre Eurobin



3.3.7 Food waste will be stored in 240-litre wheeled bins as shown in Figure 3-4.

Figure 3-4 Example 240-Litre Wheeled Bin



3.3.8 Applying the waste metrics summarised in Table 3-1 to the area schedule detailed in Table 3-2, Table 3-4 summarises the waste storage requirements for the Proposed Development according to the specified collection frequency.

Table 3-4 Waste Storage Requirements

Frequency	Number of Containers			Total
	1,100-Litre Eurobins		240-Litre Wheeled Bins	
	Residual Waste	DMR	Food Waste	
Weekly	2	5	2	9
Twice-Weekly	1	3	1	5

3.3.9 Smaller containers with more frequent collections could be utilised if a particular need was encountered.

3.3.10 Table 3-5 below details the dimensions of the containers summarised in Table 3-4.



Table 3-5 Container Dimensions –Waste Storage

Container	Dimensions (mm)			Source
	Height	Width	Depth	
1,100-Litre Eurobin	1,370	1,260	985	The Guidance
240-Litre Wheeled Bin	1,070	580	740	

3.3.11 The waste store will be designed to British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice* standards.

3.3.12 In summary, the waste facilities will include the following:

- ⦿ A suitable water point in close proximity to allow washing down;
- ⦿ All surfaces sealed with a suitable wash proof finish (vinyl, tiles etc.);
- ⦿ All surfaces easy to clean;
- ⦿ Suitable floor drain; and
- ⦿ Suitable lighting and ventilation.

COMMERCIAL WASTE COLLECTION

3.3.13 A commercial waste contractor will be appointed to service the Proposed Development once operational on an agreed schedule.

3.3.14 On nominated collection days, the RCV will enter the Proposed Development traversing through the staff car park area to the Service Area stopping adjacent to the waste store.

3.3.15 The waste collection operatives will access the bins from the commercial waste store directly and wheel them to the waiting RCV.

3.3.16 As per BS5906:2005 the path between the collection vehicle and the commercial waste store will be:

- ⦿ Minimum width 2 metres;
- ⦿ Free from kerbs or steps;
- ⦿ Solid foundation; and
- ⦿ Suitably paved with a smooth continuous finish.

3.3.17 Once the bins have been emptied, the collection operatives will return them to the commercial waste store.



4 SUMMARY AND CONCLUSION

4.1 SUMMARY

- 4.1.1 Estimated commercial waste generation has been calculated using appropriate metrics extracted from BS5906:2005.
- 4.1.2 Temporary internal waste storage will be provided within the building to allow for the segregation of waste at source.
- 4.1.3 The on-site FM team will transfer the segregated waste from the temporary internal waste storage to the commercial waste store to the side of the service area.
- 4.1.4 A commercial waste contractor will be appointed to service the Proposed Development once operational on an agreed schedule.
- 4.1.5 The commercial waste contractor will collect the bins directly from the commercial waste store, returning the bins once empty. No containers will be permitted to be presented on the public highway.

4.2 CONCLUSION

- 4.2.1 This OWMS has taken into account the need to lessen the overall impact of waste generation through the recycling of materials from the operational phase of the Proposed Development.
- 4.2.2 The proposals set out in this strategy meet the requirements of relevant waste policy and follow applicable guidance.



APPENDIX A

NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

NATIONAL WASTE POLICY

MHCLG, NATIONAL PLANNING POLICY FRAMEWORK (2024)¹

The revised National Planning Policy Framework was updated in December 2024 and sets out the government's planning policies for England and how these are expected to be applied. It does not include anything of relevance to waste management that would be applicable to the Proposed Development.

DCLG, NATIONAL PLANNING POLICY FOR WASTE (2014)²

The National Planning Policy for Waste replaces 'Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS 10)' and is to be considered alongside other national planning policy for England - such as in the NPPF and the Waste Management Plan for England. As the primary focus is on planning for waste management facilities, it is not considered relevant to the Proposed Development.

DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS (DEFRA), OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND (2018)³

The strategy sets out how England will preserve the stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. At the same time, the country will minimise the damage caused to the natural environment by reducing and managing waste safely and carefully, and by tackling waste crime.

It combines actions the country will take now, with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. This is the blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity, and eliminating avoidable waste of all kinds by 2050.

DEFRA, WASTE MANAGEMENT PLAN FOR ENGLAND (2021)⁴

The Waste Management Plan for England fulfils the requirements of the Waste (England and Wales) Regulations 2011 for the waste management plan to be reviewed every six years. It focuses on waste arisings and their management. It is a high-level, non-site-specific document and provides an analysis of the current waste management situation in England. It does not include anything of relevance to waste management that would be applicable to the Proposed Development.

WASTE HIERARCHY

The Waste Hierarchy requires avoidance of waste in the first instance followed by reducing the volume that requires disposal after it has been generated.

It gives an order of preference for waste management options to minimise the volume for disposal, as shown in Figure A1.1.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

⁴ <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

Figure A1.1: The Waste Hierarchy



The main principles of the Waste Hierarchy are:

- ⦿ Waste should be prevented or reduced at source as far as possible;
- ⦿ Where waste cannot be prevented, waste materials or products should be reused directly or refurbished and then reused;
- ⦿ Waste materials should be recycled or reprocessed into a form that allows them to be reclaimed as a secondary raw material;
- ⦿ Where useful secondary materials cannot be reclaimed, the energy content of the waste should be recovered and used as a substitute for non-renewable energy resources; and
- ⦿ Only if waste cannot be prevented, reclaimed or recovered, should it be disposed of into the environment, and this should only be undertaken in a controlled manner.

The Waste Hierarchy has been implemented in England and Wales by the Waste (England and Wales) Regulations 2011. These regulations require that an establishment or undertaking that imports, produces, collects, transports, recovers or disposes of waste must take reasonable steps to apply the Waste Hierarchy when waste is transferred or disposed of.

HM GOVERNMENT, A GREEN FUTURE: OUR 25 YEAR PLAN TO IMPROVE THE ENVIRONMENT (2018)⁵

The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. Its aim is to deliver cleaner air and water in cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

With regard to waste management, the plan details aims which include:

- ⦿ Zero avoidable plastic waste by 2042;
- ⦿ Reduce food waste; and
- ⦿ Improving the management of residual waste.

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

LONDON WASTE POLICY & GUIDANCE

GLA, THE LONDON PLAN (MARCH 2021)⁶

The London Plan is the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The strategy includes the following waste management policy that has influenced the development of more specific business waste guidance:

'Policy D3 Optimising site capacity through the design-led approach

3.1B.18 Shared and easily accessible storage space supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.'

'Policy SI7 Reducing waste and supporting the circular economy

Resource conservation, waste reduction, increases in material re-use and recycling, and reduction in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

5) design developments with adequate, flexible and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.'

GLA, LONDON ENVIRONMENT STRATEGY (2018)⁷

The Mayor, with the new London Environment Strategy, aims to make London a zero-waste city. By 2026, no biodegradable or recyclable waste will be sent to landfill and by 2030, 65% of London's municipal waste will be recycled.

With regards to waste management within the Proposed Development, the following extracts are of relevance:

'To help them achieve the recycling targets, waste authorities should deliver the following minimum level of service for household recycling:

- ⦿ all properties with kerbside recycling collections to receive a separate weekly food waste collection
- ⦿ all properties to receive a collection of, at a minimum, the six main dry recycling materials, i.e. glass, cans, paper, card, plastic bottles and mixed rigid plastics (tubs, pots and trays)

Proposal 7.2.1.c The Mayor will support efforts to increase recycling rates in flats

The Mayor will encourage Resource London to provide more support and funding to those waste authorities that are working towards achieving higher recycling performance in flats. Through LWARB, the Mayor will seek additional funding to tackle recycling performance in flats. The London Plan requires that all new developments referred to the Mayor include adequate recycling storage for at least the six main dry recyclable materials and food.

⁶ GLA (2021) *The London Plan*

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁷ GLA (2018) *London Environment Strategy*

https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

Waste authorities, through the planning application process, should apply the waste management planning advice for flats, including the domestic rented sector, developed by LWARB in partnership with the London Environment Directors Network (LEDNET).'

LONDON PLAN GUIDANCE: CIRCULAR ECONOMY STATEMENTS (2022)⁸

The London Plan Guidance Circular Economy Statements puts circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their lifetime. It treats building materials as resources rather than waste, and puts in place a clear hierarchy, prioritising the retention of existing structures above demolition, where this is the more sustainable and appropriate approach.

The guidance applies to the largest developments in London that are referable to the Mayor, as required by London Plan Policy 2021 SI 7, however boroughs are encouraged to apply the policies for smaller developments.

LOCAL WASTE POLICY & GUIDANCE

WEST LONDON WASTE AUTHORITY (WLWA), WEST LONDON WASTE PLAN (2015)⁹

This document is the Joint Waste Plan for the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and Old Oak and Park Royal Development Corporation. In London, six boroughs agreed to co-operate to produce a single waste plan for their combined area that now forms part of each of their respective Local Plans. It also forms part of the development plan for the Old Oak and Park Royal Development Corporation (OPDC).

The West London Waste Plan:

- ⊙ Details the estimated amounts for the different site types of waste that will be produced in West London up to 2031;
- ⊙ Identifies and protects the current sites to help deal with that waste;
- ⊙ Identifies the shortfall of capacity need over the life of the Plan (to 2031); and
- ⊙ Allocated a set of sites to meet the shortfall which are preferred for waste related development.

Policy WLWP 4: *Ensuring High Quality Development* provides a range of criteria to guide developers in the consideration of mitigation of the impacts of their development on the environment, the community and appearance of the local area. Developers are expected to have actively considered innovative and sustainable design approaches so that developments are in accordance with best practice. Developers are expected to submit details of proposed control measures with any planning applications.

Policy WLP 6: *Sustainable Site Waste Management* states that the management of waste from a development should be in accordance with the waste hierarchy, and developments should support the management of wastes as far up the hierarchy as possible.

LBH, HILLINGDON LOCAL PLAN (PART 1) – STRATEGIC POLICIES (2012)¹⁰

Policy EM11: *Sustainable Waste Management* states that the LBH aims to reduce the amount of waste produced within the Borough. The policy states that all new developments must address waste management at all stages of the development's life

⁸ GLA (2022) *Circular Economy Statements* https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

⁹ WLWA (2015) *West London Waste Plan* <https://www.brent.gov.uk/media/16402581/west-london-waste-plan.pdf>

¹⁰ LBH (2012) *Local Plan Part 1* https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/nplLocal_Plan_Part_1_Strategic_Policies_15_feb_2013_a_1_1.pdf?m=1598370401647

from design and construction through to operation and end use. It is also noted that developments should aim to manage waste towards the upper end of the waste hierarchy (i.e. prevent, reduce, re-use). The LBH aim to achieve this by promoting the reduction of waste generation through implementing measures such as bioremediation of soils and best practice in building construction.

LBH, HILLINGDON LOCAL PLAN (PART 2) (SEPTEMBER 2020)¹¹;

Policy DMHB 11: *Design of New Development* states that the design of waste management facilities within new developments must be factored into the design from the start. The policy states that all proposals for new developments are expected to provide satisfactory arrangements for internal and external storage and collection for general waste and recyclable waste. External bins should be located and screened to avoid adverse visual impacts to both occupiers and neighbours as waste has the potential to cause serious nuisance if not managed appropriately.

Policy MIN 4: *Re-use and Recycling of Aggregates* states that all developments are encouraged to:

- ⦿ Recycle and re-use construction, demolition and excavation waste as aggregates;
- ⦿ Process and re-use recyclable material on-site, and where this is not possible, the material should be re-used at another site for land restoration; and
- ⦿ Use substitute or recycled materials in new development in place of primary materials.

¹¹ LBH (2020), Local Plan Part 2 https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2_Development_Management_Policies_-_ADOPTED_VERSION_JAN_2020_1.pdf?m=1598370641570

APPENDIX B

SWEPT PATH ANALYSIS

