TROUT ROAD

OPERATIONAL WASTE MANAGEMENT STRATEGY

PROJECT NO. 24-119 DOC NO. D012

DATE: SEPTEMBER 2025

VERSION: 1.0

CLIENT: TROUTBOURNE LLP

Velocity Transport Planning Ltd

www.velocity-tp.com

DOCUMENT CONTROL SHEET

Document Reference

Project Title	Trout Road
Document Title	Operational Waste Management Strategy
Project Number	24-119
Document Number	D012
Revision No.	1.0
Document Date	SEPTEMBER 2025

Document Review

	Name	Date completed
Prepared By	Richard Botting	18/09/2025
Reviewed By	Oliver James	18/09/2025
Authorised By	Peter Hambling	18/09/2025

Notes

The document reference number, revision number and date are given on the footer of each page

TABLE OF CONTENTS

FIGURES

TABLES

APPENDICES

1 INTRODUCTION

1.1 PROJECT INTRODUCTION

1.1.1 This Operational Waste Management Strategy (OWMS) has been prepared by Velocity Transport Planning, on behalf of Troutbourne LLP ('the Applicant'), to support a Planning Application for a mixed-use development at the Rainbow and Kirby Industrial Estates, Trout Road, Yiewsley, UB7 7XT ('the Site') in 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 comprises the Rainbow and Kirby Industrial Estates, which accommodate an approximately 2.3 hectare plot within the London Borough of Hillingdon ('LBH'). Parts of the Site front the south side of Trout Road, the western side of Yiewsley High Street, and the northwest side of St Stephen's Road, with the entire southwest boundary bordered by the Grand Union Canal. The Site largely accommodates a range of single-storey and two-storey industrial buildings, many of which were in a poor state of repair, particularly those fronting Trout Road.

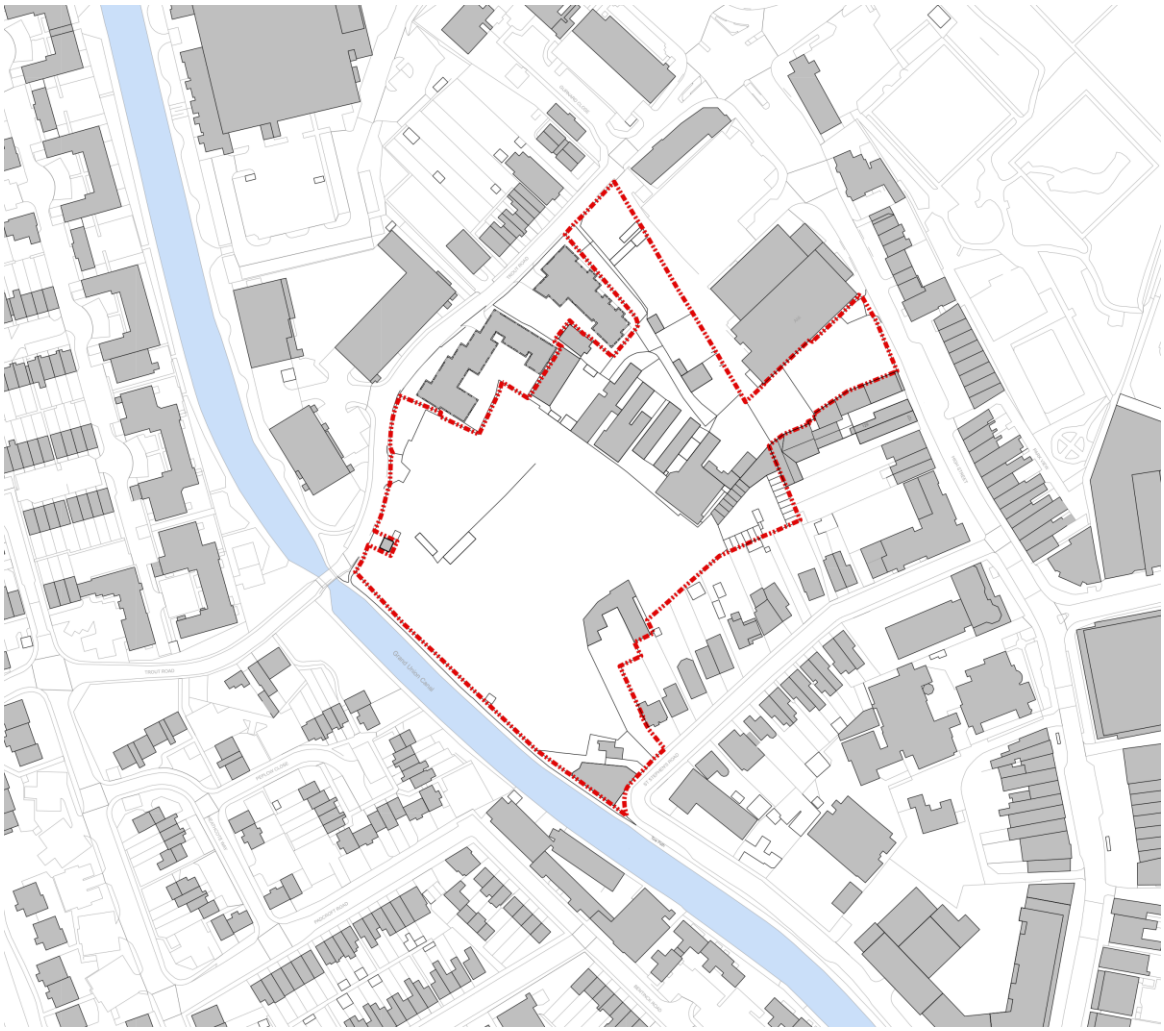
1.2.2 The surrounding area comprises a mix of industrial uses, commercial uses and residential properties, with building heights ranging from two storeys up to five storeys. Both the former church immediately opposite the Site's High Street frontage and the George & Dragon Public House to the north are locally listed buildings. The Site is not located within a conservation area and does not contain any statutory listed or locally listed buildings.

1.2.3 The Site is allocated in the LBH Local Plan, adopted in 2020, for a mixed-use development which is to be brought forward 'in accordance with the broad parameters of the approved scheme, subject to site-specific constraints (Ref: 38058/APP/2013/1756)'.

1.2.4 The Site is located on Trout Road in West Drayton, which runs along the northern boundary of the Site. It is bordered by A408 High Street to the east, St Stephen's Road to the south and the Grand Union Canal to the west.

1.2.5 The site location is shown in **Figure 1-1** below:

Figure 1-1 Site Location – Rainbow and Kirby Industrial Estates



1.3 PROPOSED DEVELOPMENT

1.3.1 The Proposed Development is described as follows:

> *"Demolition of existing structures and phased redevelopment of the site to provide nine plots ranging between 3 storeys and 11 storeys in height (including ground level) to include residential units (Use Class C3), flexible retail/café/restaurant floorspace (Class E (a,b,c)), light industrial floorspace (Class E (g)(iii)), associated hard and soft landscaping, car parking, cycle parking, servicing, refuse and plant areas, public realm improvements, highways works and other works associated with the development."*

1.3.2 The proposal comprises a mixed-used residential-led development, consisting of 433 dwellings. The proposal also includes 2,257 sqm (GEA) of workspace or 'makerspace' (Class E (g)(iii)) and 324 sqm (GEA) of flexible retail/café/restaurant use (Class E (a,b,c)).

1.4 DOCUMENT STRUCTURE

1.4.1 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 3: Management of Residential Waste** – provides an estimate of residential waste arising and outlines the plan which will be adopted to manage the waste arising from the Proposed Development once operational.
- **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 is 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 national waste legislation is outlined below in reverse chronological order:

2.2.2 **The Separation of Waste (England) Regulations 2024** – These regulations were originally implemented on 30 June 2024 and introduced a mandatory requirement for separate collection of recyclable household waste and the recyclable relevant waste from both domestic and commercial sectors. This approach was previously recommended under the Waste (England and Wales) Regulations 2011. As a result of the change of Government in July 2024, these regulations were postponed, and the new Government issued its intention to introduce a "Simpler Recycling" policy starting from March 2025 for commercial premises and from March 2026 for domestic premises.

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 practice 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 wastepaper, metal, plastic, and glass separately. This legislation also imposes a duty on waste collection authorities, 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 OWMS 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);
- 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 This OWMS will demonstrate:

- The quantity of municipal waste the Proposed Development is expected to generate once operational;
- How operational waste will be managed in accordance with the *Waste Hierarchy;*
- How operational waste management performance will be monitored and reported; and
- That measures such as consolidated, smart logistics and community-led waste minimisation schemes have been explored.

2.4.2 Additional information related to the *Waste Hierarchy* and other prevailing guidance mentioned in this section can be found in **APPENDIX A**.

2.4.3 Once operational, residential waste will be managed in accordance with the *Waste Hierarchy*.

2.4.4 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 landfill by 2026.

2.4.5 Residential recycling rates are dictated by the collection authority; facilities have been designed in accordance with LBH requirements stated in guidance from Officers and BS5906:2005 – Waste Management in Buildings – Code of Practice. As recycling performance increases, the waste storage can be adapted to reflect these changes and meet the relevant 65% target.

2.4.6 Residential waste streams will include:

- Residual waste;
- Dry Mixed Recycling (DMR); and
- Food waste.

2.4.7 LBH currently accepts the following types to be put into the DMR bin, including:

- Cardboard;
- Mixed paper;
- Plastic packaging;

- Tins and cans;
- Glass; and
- Aluminium foils.

2.4.8 LBH currently does not provide separate collection and recycling services for food waste from private apartments. Nonetheless, it is likely that LBH will introduce a weekly food waste collection service to every property across the borough in the coming years under the Simpler Recycling requirements.

2.4.9 The Simpler Recycling requirements will place a burden on LBH to separate paper and card from other DMR material. It is not anticipated that it will be required to segregate the DMR into further individual waste streams (hard plastics, films, aluminium, glass, other plastics and metals). LBH may apply for an exemption from the regulations. They are yet to state their intentions.

2.4.10 In the event that this becomes necessary to reflect prevailing legislation, the overall waste storage capacity would not be increased (only the number of separate waste streams). Hence, the residential waste stores could be configured to accommodate further waste stream segregation.

2.4.11 Using waste arising figures from LBH for 2022-2023, with census information from 2021 it is possible to calculate that the average LBH household produces **0.876 tonnes** of waste per annum.

2.4.12 Therefore, a total of **380 tonnes** of municipal waste is estimated to be generated by the Proposed Development per annum once operational.

2.4.13 Individual waste streams will be transported to suitably licenced 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).

2.4.14 **Table 2-1** below details a number of licenced waste facilities that could accept the operational waste generated by the Site.

Table 2-1 Local Licenced 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	13.8	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, Edmonton, London, N18 3AG	0207 000 9595	19	
Riverside Resource Recovery Limited	EfW	BK0825IU	Riverside Resource Recovery Facility, Norman Road, Belvedere, Bexley, Kent, DA17 6JY	0208 320 3310	24.2	
Grundon Waste Management Limited	EfW	BT2866IG	Grundon Waste Management Ltd, Lakeside Road, Colnbrook, Slough, Buckinghamshire, SL3 0EG	01753 688430	9.5	
Biffa Waste Management North London	MRF / WTS	HP3098EW	12 Unit 2, Ardra Road, Enfield, London, N9 0BD	0800 307 307	19.3	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)
Bywaters (Leyton) Limited	MRF / WTS	SP3093EA	Unit J Prologis Park, Twelvetrees Crescent, Bow, London, E3 3JG	0207 001 6000	17.1	
Recorra Recycling Facility	MRF / WTS	EB3135AD	Units 38-39, Juliette Way, Purfleet Ind Park, Purfleet, Essex, RM15 4YA	0207 442 2202	35.2	
Veolia	MRF / WTS	DP3390EL	Greenwich Integrated Waste Management Facility, Nathan Way, Plumstead Marsh, City of London, London, SE28 0AF	07463 225762	21.4	
Refood Ltd	AD	AP3938EJ	London Sustainable Industries Park, Choats Rd, Barking, Dagenham RM9 6LF	0800 011 3214	31.4	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	21.2	

OPERATIONAL WASTE REPORTING

2.4.15 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.

SMART LOGISTICS & WASTE MINIMISATION

2.4.16 Through good practice measures, occupants will be encouraged to reduce and prevent waste. Both the developer and the LBH waste management department will be encouraged to engage with residents upon occupation, to ensure they are aware of how to minimise their waste.

2.4.17 Community-led waste minimising initiatives will be encouraged, such as partnering with organisations that can redistribute redundant items or furniture on site, including:

- Warp-it;
- Collectco; and
- Reuse Network.

2.4.18 LBH is part of the West London West Authority (WLWA) who host campaigns and local events including:

- Clothes Swaps;
- Reusable Nappy Events; and

- Fixing Factory for broken technology.

3 MANAGEMENT OF RESIDENTIAL 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 number of discrete mixed-use commercial and residential Plots. This section addresses the residential waste.

3.1.2 This strategy has been developed in accordance with standards received from LBH Officers and in BS5906:2005 (hereafter collectively referred to as 'the Guidance').

3.2 CURRENT WASTE MANAGEMENT SERVICES

3.2.1 **Table 3-1** outlines the current waste collection and disposal services provided by LBH for residents.

Table 3-1 LBH Residential Waste Management Services

Service	Details
Residual Waste	Collected weekly in black bags or green bins
Dry-Mixed Recycling (DMR) collection	Collected weekly in clear bags or black bins
Garden waste collection	Subscription service in reusable bags
Food waste collection	No collection service at the moment for private apartments. Will be collected weekly in 140L communal food waste bins upon commencement of the service
Bulky waste collection	Chargeable collection service
Local recycling points	A number are located across the borough
Reuse and Recycling Centres	A reuse and recycling centre is available for residents to use at West Drayton Waste Facility, 69 Tavistock Road, West Drayton, UB7 7QT (open at weekends)

3.3 PROPOSED DEVELOPMENT PLOT LAYOUT

3.3.1 **Figure 3-1** below shows the configuration for the Proposed Development.

Figure 3-1 Proposed Development Configuration

3.3.2 **Table 3-2** summarises the accommodation schedule for the Proposed Development.

Table 3-2 Accommodation Schedule

Plot	Number of Units			
	1 Bed	2 Bed	3 Bed	Total
A	10	11	0	21
B1	24	34	2	60
B2	21	22	4	47
B3	16	25	04	45
C1	6	10	6	16
D1	5	9	2	20
D2	6	16	6	24
D3	5	9	0	20
E	23	10	0	33
F	48	16	0	64
G	60	20	0	80
H	0	0	3	3
Total	**224**	**182**	27	**433**

3.4 INDIVIDUAL DWELLINGS STORAGE REQUIREMENTS

3.4.1 LBH is a non-wheelie bin collection borough for individual properties, with residual and DMR collected in sacks from the kerbside.

3.4.2 Individual residential dwellings will be provided with space for the storage of bins to store full sacks prior to collection, within the curtilage of the property.

3.4.3 According to the Guidance, each property should have access to a minimum of 240 litres of residual waste and 240 litres of DMR capacity.

3.4.4 **Table 3-3** details the storage requirements for individual dwellings, as informed by LBH Recycling Team.

Table 3-3 LBH Storage Requirements - Individual Dwellings

Residual Waste	DMR	Food
90-Litres	90-Litres	23-Litre green caddy

3.5 COMMUNAL WASTE STORAGE REQUIREMENTS

3.5.1 **Table 3-4** details the LBH residential waste metrics for properties with communal waste storage, as received from the LBH Recycling Team.

Table 3-4 Residential Waste Metrics – Waste Storage

Unit Type	Storage Provision (Litres)		
	Residual Waste	DMR	Food Waste
1-Bed	60	60	5
2-Bed	120	120	
3-Bed	240	240	

3.5.2 Residential food waste is not currently collected in LBH from private apartments; however, this is currently under review. To ensure a robust, future-proofed waste management strategy, provision for the storage of residential food waste has been included within the Proposed Development, as required by future legislation.

3.5.3 Applying the waste metric summarised in **Table 3-4** to the accommodation schedule in **Table 3-2**, **Table 3-5** summarises the estimated weekly waste generation for the Proposed Development once operational.

Table 3-5 Estimated Weekly Waste Generation - Communal Waste Storage

Plot	Weekly Waste Generation (Litres)			
	Residual Waste	DMR	Food Waste	Total
A	1,920	1,920	105	3,945
B1	5,880	5,880	300	12,060
B2	4,620	4,620	235	9,475
B3	4,680	4,680	225	9,585
C1	1,560	1,560	80	3,200
D1	2,460	2,460	100	5,020
D2	2,640	2,640	120	5,400
D3	2,460	2,460	100	5,020
E	2,580	2,580	165	5,325
F	4,800	4,800	320	9,920
G	6,000	6,000	400	12,400
H	540	540	15	1,095
Total	**40,140**	**40,140**	**2,165**	**82,445**

3.6 PROPOSED WASTE MANAGEMENT STRATEGY

3.6.1 The proposed strategy to manage residential waste has been devised to provide a high-quality service to residents whilst also being compliant with the Guidance.

3.6.2 The proposed waste management strategy has been split into the following parts:

- Internal Residential Waste Storage (Refer to Section **3.7**);
- Residential Waste Management Strategy – Individual Dwellings (Refer to Section **3.8**);
- Residential Waste Management Strategy – Communal Waste Storage (Refer to Section **3.9**);
- Bulky Waste (Refer to Section **3.10**).

3.7 INTERNAL RESIDENTIAL WASTE STORAGE

3.7.1 Each residential property will be provided with a segregated waste bin, to conveniently store and organise their waste materials before transferring these to the external containers. This will be provided via a segregated bin which will be fixed into an appropriate kitchen unit with a minimum width of 500mm.

3.7.2 **Figure 3-2** shows an example of a commercially available segregated kitchen bin.

Figure 3-2 Example Segregated Kitchen Bin[1]

3.7.3 The segregated waste bin shown in **Figure 3-2** includes the following bin capacities:

- Residual Waste: 40 litres; and
- Recyclables: 60 litres;

3.7.4 Where food waste is collected from communal waste stores, a small 5-litre food waste caddy may be used for the collection of food waste within the apartment prior to the transfer of the food waste to the bulk container within the waste store.

3.7.5 **Figure 3-3** shows an example of a food waste caddy for internal use.

Figure 3-3 Example Food Waste Caddy

[1] Example Kitchen Bin

https://selectcomponents.com/product/400mm-40l-grey-base-mounted-2-x-20ltr-containers/?gad_source=1&gclid=EAIaIQobChMI68LA29j3igMVSplQBh0_CDfWEAQYBCABEgLEe_D_BwEhttps://www.hafele.co.uk/en/product/pull-out-waste-bin-for-hinged-door-cabinets-2x-10-1x-20-litres/0000008e000185f900040023/ -SearchParameter=&Category=DMPAqBtGW4gAAAFP5sY4lnbm&checkbox_fs_waste_bin_installation=Bottom+Mounted&FF.followSearch=9950&@P.FF.followSearch=9997&PageNumber=1&OriginalPageSize=12&PageSize=12&Position=7&OrigPos=287&ProductListSize=18

3.8 RESIDENTIAL WASTE STRATEGY – INDIVIDUAL DWELLINGS

3.8.1 The following section details the residential waste strategy for the individual dwellings within the Proposed Development, located in Plot H. The properties all have ground level access.

3.8.2 The individual dwellings within the Proposed Development are highlighted in green in **Figure 3-4** below.

Figure 3-4 Individual Dwellings – Plot H

3.8.3 Each unit will be provided with sufficient space to store the waste summarised in **Table 3-3** within their curtilage. The waste may be stored either in the collection sacks or within a self-provided 90-litre dustbin.

3.8.4 On collection days, residents will present their individual sacks in the waste presentation areas shown in red in **Figure 3-5** below.

Figure 3-5 Bin Management Strategy - Individual Dwellings

3.8.5 The sacks may only be presented on the public highway no earlier than 5:00pm on the day before.

3.8.6 The LBH collection operatives will collect the sacks into the waiting Refuse Collection Vehicle (RCV).

3.8.7 In accordance with the Guidance, the route between the waste presentation area and the RCV will:

- be free from steps or kerbs;
- have a solid foundation;
- have a smooth, solid surface; and
- be level and have a gradient of no more than 1:12, with a minimum width of 2 metres.

3.9 RESIDENTIAL WASTE STRATEGY – PROPERTIES WITH COMMUNAL WASTE STORAGE

3.9.1 The following section details the residential waste strategy for the properties with communal waste storage within the Proposed Development.

3.9.2 Each plot will be provided with a residential waste store at ground floor level, for residents to deposit their segregated waste.

3.9.3 Residual waste and DMR will be stored in 1,100-litre Eurobins, an example of which is shown in **Figure 3-6** below.

Figure 3-6 Example 1,100-Litre Eurobin

3.9.4 Food waste will be stored in 140-litre wheeled bins, an example of which is shown in **Figure 3-7** below.

Figure 3-7 Example 140-Litre Wheeled Bin

3.9.5 Based on the estimated weekly waste generation detailed in **Table 3-5**, **Table 3-6** below summarises the waste storage requirements for the Proposed Development for properties with communal waste storage.

Table 3-6 Communal Waste Storage Requirements

Plot	Number of Containers			Total
	1,100-Litre Eurobins		140-Litre Wheeled Bins	
	Residual Waste	DMR	Food Waste	
A	2	2	1	**5**
B1	6	6	3	**15**
B2	5	5	2	**12**
B3	5	5	2	**12**
C1	2	2	1	**5**
D1	3	3	1	**7**
D2	3	3	1	**7**
D3	3	3	1	**7**
E	3	3	2	**8**
F	5	5	3	**13**
G	6	6	3	**15**
Total	**44**	**44**	**21**	**109**

3.9.6 **Table 3-7** below details the dimensions of the containers summarised in **Table 3-6**.

Table 3-7 Container Dimensions – Communal Waste Storage

Container	Dimensions (mm)			Source
	Height	Width	Depth	
1,100-Litre Eurobin	1,380	1,260	1,000	The Guidance
140-Litre Wheeled Bin	1,366	734	734	

3.9.7 Residents will be required to transport the waste from their property directly to the nearest residential waste store using the passenger lifts (where necessary), where they will segregate the waste into the appropriately labelled bins.

3.9.8 The locations of the ground-floor level residential waste stores are shown in green in **Figure 3-8** and **Figure 3-9**.

Figure 3-8 Residential Waste Stores – Plots A/B1/B2/B3/C

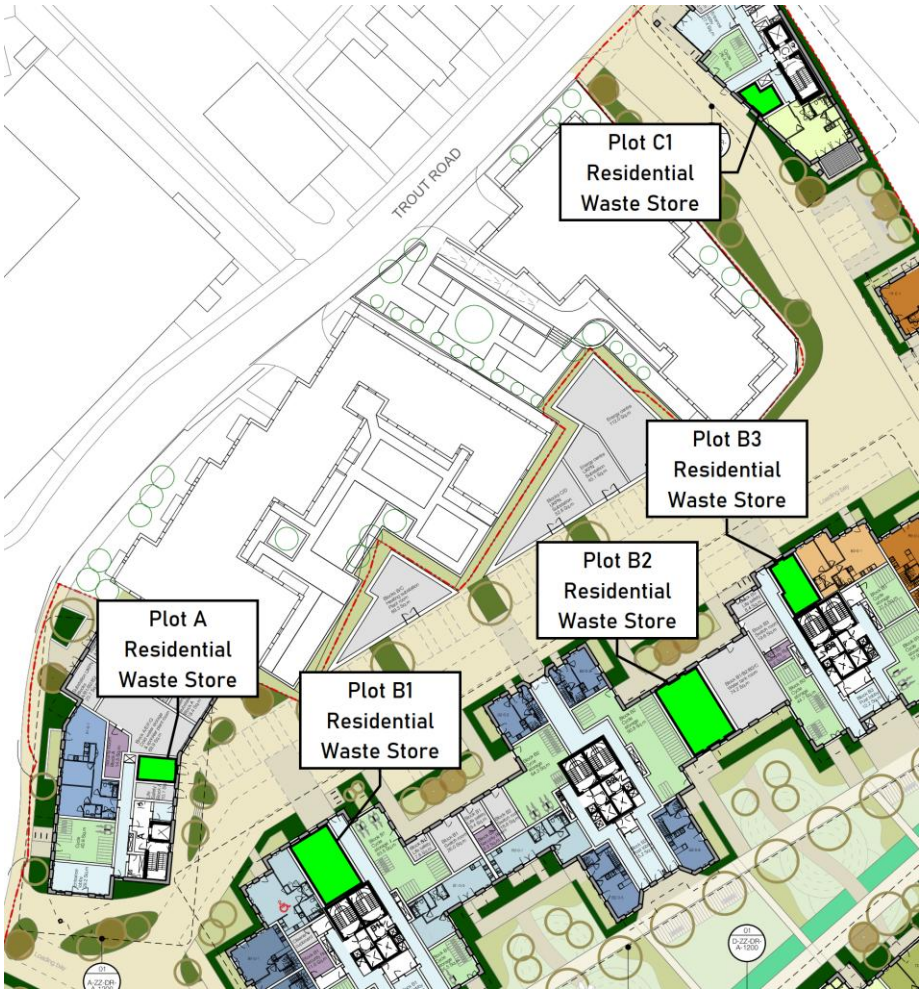
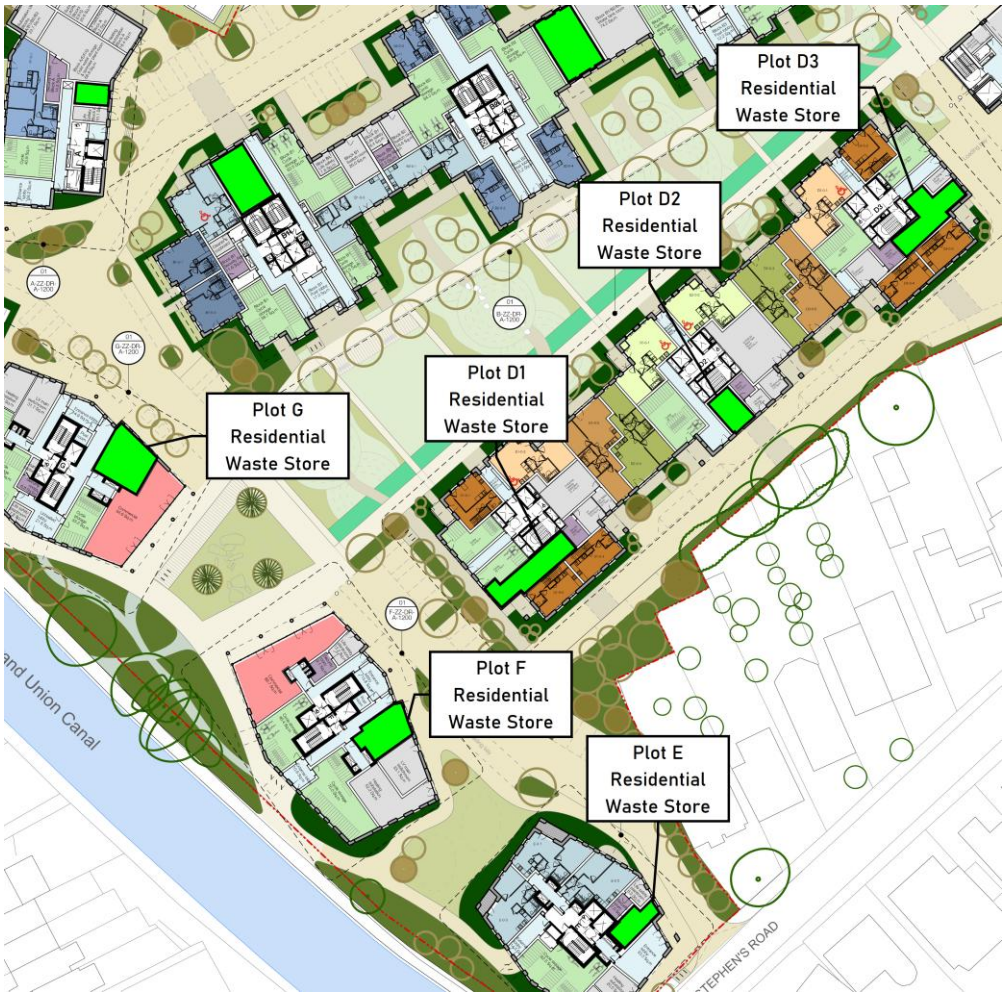


Figure 3-9 Residential Waste Stores – Plots D1/D2/D3/E/F/G



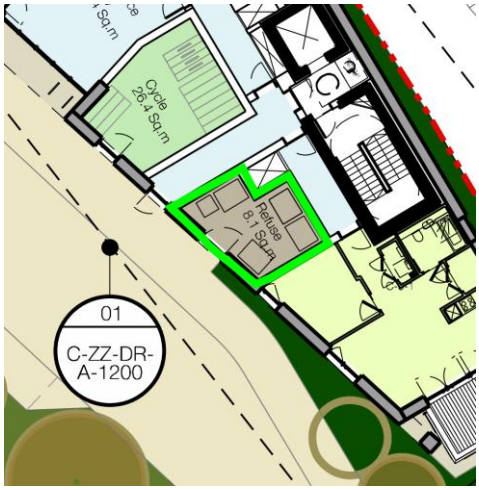
3.9.9 The configurations of the residential waste stores are shown in **Figure 3-10** to **Figure 3-13** below.

Figure 3-10 Residential Waste Store Configuration – Plots A/B1/G

Figure 3-11 Residential Waste Store Configuration – Plots D1/D2/E/F

Figure 3-12 Residential Waste Store Configuration – Plots B2/B3/C/D3

Figure 3-13 Residential Waste Store Configuration – Plot C



3.9.10 All waste facilities will be designed to British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice* standards. In summary, the waste facilities will include the following:

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

WASTE COLLECTION

3.9.11 On the nominated collection day, the LBH RCV will approach the Proposed Development and position itself on the kerbside, or within the provided loading bays, adjacent to each of the residential waste stores as indicated by the swept path analysis diagrams shown in **APPENDIX B**.

3.9.12 With regard to access by the RCV, the following assumptions have been made:

- Plot A waste store will be accessed from the kerbside on the east of the building.
- Plots B1, B2 and B3 waste stores will be accessed from the kerbside on the north-west of the building outside each waste store.
- Plot C waste store will be accessed from the kerbside on the south-west side of the building.
- Plots D1 and D2 waste stores will be accessed from the kerbside on the south-east side of the building.
- Plot D3 waste store will be accessed from the loading bay at the north-east side of the building.
- Plot E waste store will be accessed from the kerbside on the north-east side of the building.
- Plot F waste store will be accessed from the adjacent loading bay to the north-east.
- Plot G waste store will be accessed from the kerbside with the vehicle in the turning head at the end of the road outside the store.

3.9.13 The LBH waste collection operatives will access the bins from each residential waste store directly, (as described above), and wheel them to the waiting RCV.

3.9.14 Once the bins have been emptied, the operatives will return them to the residential waste stores.

3.9.15 In accordance with the Guidance, the route between the residential waste stores and the RCV will:

- be free from steps or kerbs;
- have a solid foundation;
- have a smooth, solid surface; and
- be level and have a gradient of no more than 1:12, with a minimum width of 2 metres.

3.9.16 Clear space on the kerbside will be provided for the RCV and dropped kerbs in locations for transition of bins to the carriageway during collections.

3.9.17 **Figure 3-14** to **Figure 3-21** below show the loading positions for the RCV, which should be considered indicative.

Figure 3-14 Plot A Collection Access

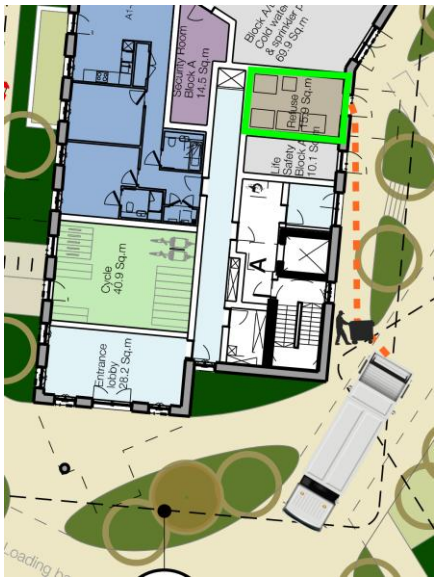


Figure 3-15 Plots B1/B2/B3 Collection Access

Figure 3-16 Plot C Collection Access

Figure 3-17 Plots D1/ D2 Collection Access

Figure 3-18 Plot D3 Collection Access

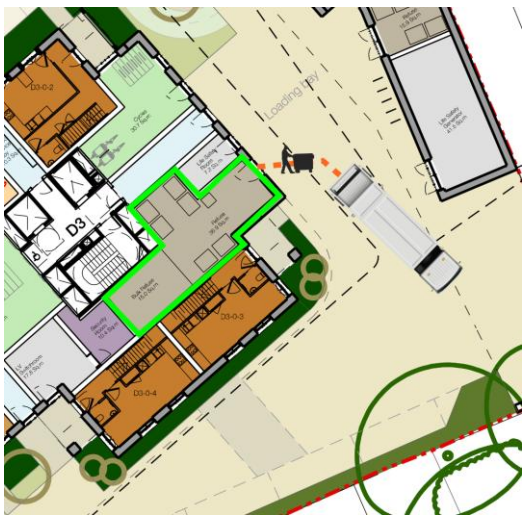


Figure 3-19 Plot E Collection Access

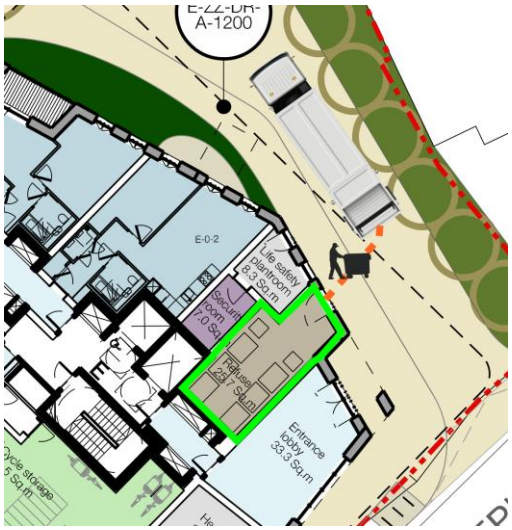


Figure 3-20 Plot F Collection Access

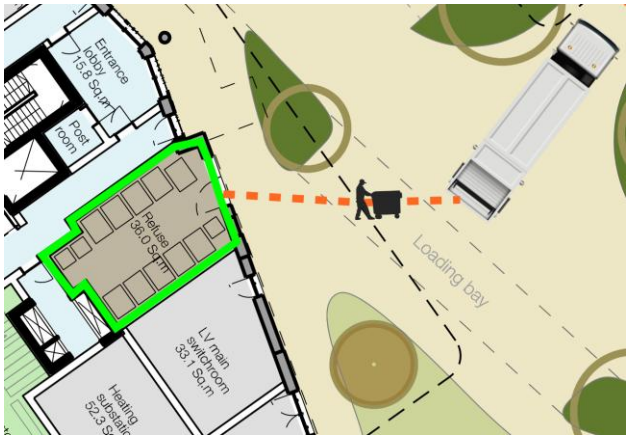
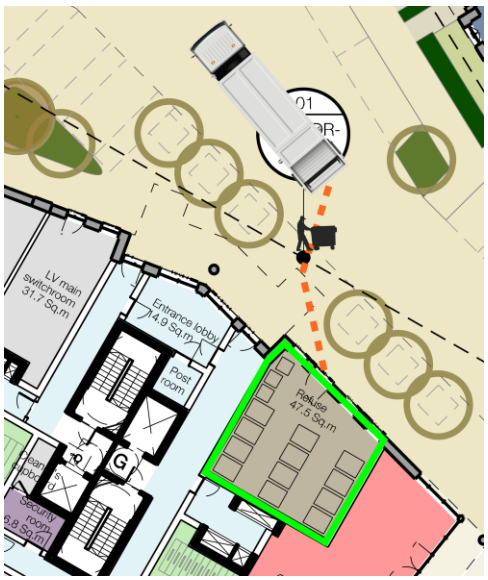


Figure 3-21 Plot G Collection Access



3.10 BULKY WASTE

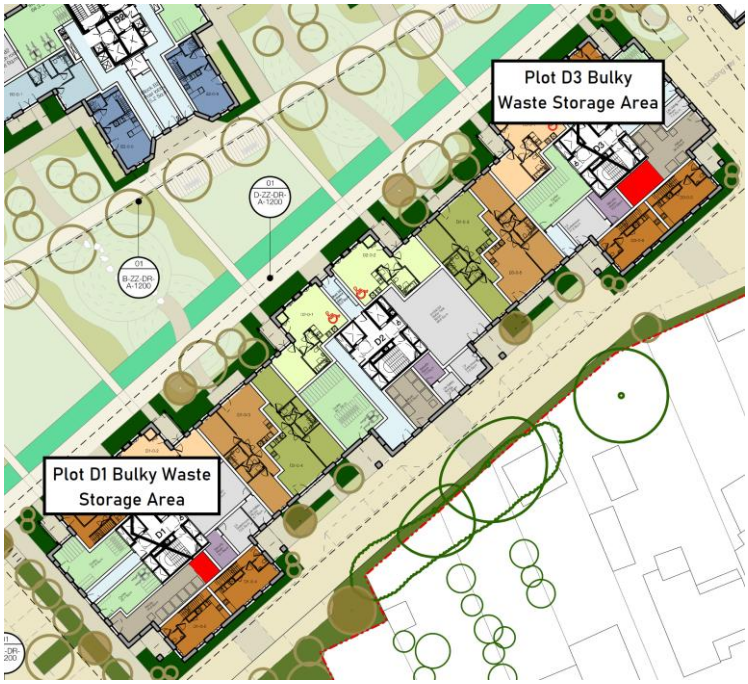
3.10.1 As per the Guidance, residents in each building will be provided with access to bulky waste storage facilities for large redundant items such as furniture or appliances.

3.10.2 The on-site Facilities Management (FM) team will be responsible for managing bulky waste at the Proposed Development, to ensure the residential waste stores are not blocked on collection days.

3.10.3 The bulky waste stores are located at the east and west ends of Plots D1 and D3. Residents wishing to dispose of bulky waste should contact the FM team for access to the nearest store.

3.10.4 The location of the bulky waste storage facilities for the Proposed Development are shown in red in **Figure 3-22** below.

Figure 3-22 Bulky Waste Stores in Plots D1/D3



3.10.5 On the nominated day, the LBH collection crew will attend the bulky waste storage areas and collect the presented items.

4 MANAGEMENT OF COMMERCIAL WASTE

4.1 INTRODUCTION

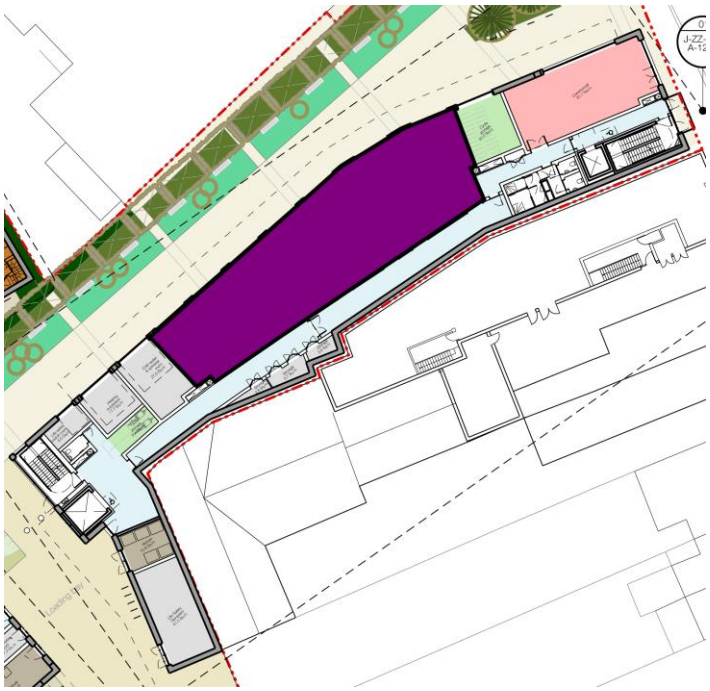
4.1.1 This section outlines the proposed waste management strategy that will be used to manage the operational waste arising from the commercial space of the Proposed Development.

4.1.2 Commercial elements provided for in Plots F, G and J comprise flexible commercial (Class E, (a, b and c)) and Light Industrial (Class E (g) (iii)) spaces.

4.1.3 **Figure 4-1** and **Figure 4-2** below shows the location of the ground level commercial spaces within Plots F, G and J of the Proposed Development in blue and the light industrial spaces within plot J in purple.

Figure 4-1 Plot F and G Commercial Spaces

Figure 4-2 Plot J Ground Level Commercial and Light Industrial Spaces



4.1.4 **Table 4-1** below summarises the commercial area schedule for the Proposed Development

Table 4-1 Commercial Area Schedule

Plot	Class Use	GIA (m²)
F	Flexible Commercial	99.7
G		94.6
J		81.7
J	Light Industrial	2,002.5
TOTAL		**2,278.5**

4.2 WASTE GENERATION MODELLING

4.2.1 LBH does not provide metrics for commercial waste generation. Waste generation metrics for the proposed commercial areas have been sourced from British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice.*

4.2.2 **Table 4-2** below summarises the commercial waste metrics for the Proposed Development. As the users of the commercial space have not yet been ascertained, to provide an average-case scenario, a mix of the following metrics have been used for the flexible commercial (Class E (a, b, c)) space.

Table 4-2 Commercial Waste Metrics

Use Class	Description	Weekly Waste Metric	Waste Composition	Assumptions
Class E (a, b, c)	50% Restaurant	Volume per number of covers [75 litres] x number of covers	• 25% Residual Waste • 70% DMR • 5% Food Waste	1 cover per 3sqm
	40% Office	Volume per employee {50 litres]x no. of employees. (1 employee per 5sqm)		-
	10% Community	Volume per sqm of floor area [5 litres] x floor area		-
Class E (g)(iii)	Industrial	Volume per sqm of floor area [5 litres] x floor area		

4.2.3 Applying the waste metrics in **Table 4-2** to the commercial area schedule in **Table 4-1**, **Table 4-3** below summarises the estimated weekly commercial waste arisings for the Proposed Development.

Table 4-3 Estimated Weekly Waste Generation

Plot	Weekly Waste Generation (Litres)			
	Residual Waste	DMR	Food Waste	Total
F	346	969	70	**1,385**
G	329	920	66	**1,315**
J (Comm)	284	794	57	**1,135**
J (Ind)	2,504	7,009	501	**10,013**
TOTAL	**3,463**	**9,692**	**694**	**13,848**

4.3 PROPOSED WASTE MANAGEMENT STRATEGY

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

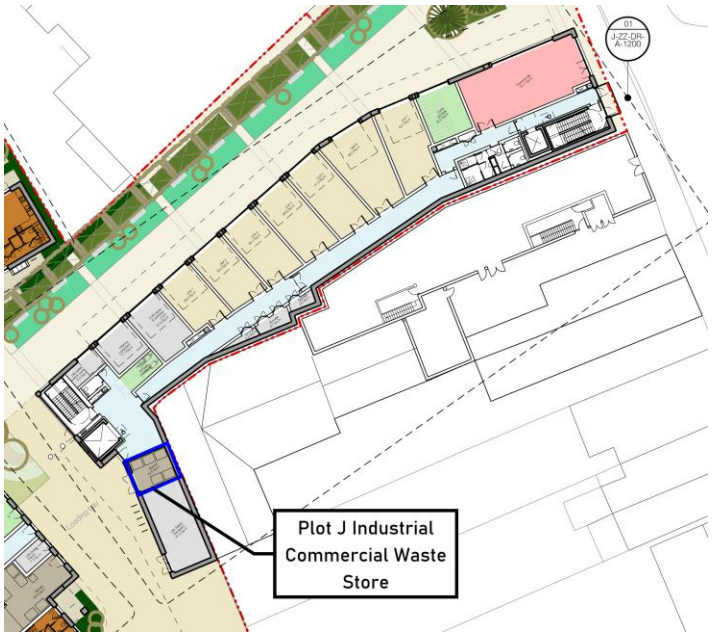
4.4 WASTE STORAGE

4.4.1 Commercial waste stores have not been provided for the commercial units in Plots F, G and J. The commercial tenants will be required to provide waste storage facilities within their tenanted area during the fit-out phase.

4.4.2 The process used to manage the waste generated by the tenant will ultimately be their responsibility to develop and implement, but the facilities must be designed to comply with the prevailing legislation and guidance.

4.4.3 For Plot J (industrial) a waste store has been provided, as shown in green in **Figure 4-3**.

Figure 4-3 Plot J (Industrial) Waste Store



4.4.4 The commercial waste stores will be designed in accordance with British Standard BS5906:2005 *Waste Management in Buildings - Code of Practice*. In summary, the facilities should include the following:

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

4.4.5 The internal waste storage areas provided by the tenants provided as part of the fit-out phase will have sufficient capacity to accommodate the waste generated by their activities. The size of the internal waste storage areas will depend upon:

- The tenant's business activities;
- The space that the tenants occupy; and
- The frequency that the tenant's appointed waste management contractor will collect the waste.

4.4.6 The waste storage facilities must include provisions for the segregation of waste streams.

4.4.7 As the internal waste storage area within the commercial units will be provided by the tenants, it is not possible to identify either the location or size of the store at this stage.

4.4.8 Using the commercial waste generation in **Table 4-3**, **Table 4-4** summarises the commercial waste storage requirements, assuming a collection frequency of two collections per week.

Table 4-4 Commercial Waste Storage Requirements (Twice-Weekly Collections)

Plot	Number of Containers		
	1,100-Litre Eurobins		240-Litre Wheeled Bins
	Residual Waste	DMR	Food Waste
F	1	1	1
G	1	1	1
J (Comm)	1	1	1
J (Ind)	2	4	2

4.4.9 The exact number of waste containers and the collection frequency will depend upon each user and the specific use of their tenancy.

4.4.10 To account for operational issues, a minimum of two days' waste storage capacity will be provided as a contingency.

4.4.11 The tenants will be responsible for arranging the collection of their waste through a suitable commercial waste management contractor.

4.4.12 For the Plot J (Industrial) communal waste store, the building management will appoint a waste management contractor.

4.4.13 On collection days, the commercial waste contractor will position their RCV in a safe and legal loading position within close proximity to the commercial units and collect the waste directly from the tenants' internal waste storage area.

4.4.14 The commercial tenants will not be permitted to present their waste for collection on the public highway.

4.5 WASTE COLLECTION

4.5.1 A commercial waste contractor will be appointed to collect the residual waste, DMR and food waste from each commercial user, or the communal waste store, of the Proposed Development.

4.5.2 As per BS5906:2005 the path to the collection vehicle will be:

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

4.5.3 Once the bins have been emptied the collection operatives will return the bins to the commercial tenant.

5 SUMMARY AND CONCLUSION

5.1 SUMMARY

RESIDENTIAL WASTE

5.1.1 Estimated weekly waste generation has been calculated using residential waste metrics extracted from the Guidance.

5.1.2 Each residential kitchen area will incorporate sufficient internal waste storage containers to promote the separation of recyclable materials at the source.

5.1.3 Residents in individual dwellings will deposit their waste into 240-litre wheeled bins positioned at the front of the curtilage of their property, to be presented at the presentation area on collection days.

5.1.4 Residents with access to communal waste facilities will deposit their segregated waste into clearly labelled bins within residential waste stores at ground level.

5.1.5 All residential waste facilities will be constructed to BS5906:2005 standards.

5.1.6 Waste within the residential waste stores will be stored in separate containers by waste stream, segregated into residual waste, DMR, and food waste.

5.1.7 Residual waste and DMR will be stored in 1,100-litre Eurobins; food waste will be stored in 140-litre wheeled bins, as per the Guidance.

5.1.8 On collection days, the LBH collection crew will access the bins directly from the residential waste stores and from the boundaries of the individual dwellings, returning them once emptied.

BULKY WASTE

5.1.9 Residents will be provided access to shared bulky waste storage facilities by the facility management team.

5.1.10 Following payment by the resident, LBH will collect bulky waste items from the ground-level bulky waste storage areas on the nominated collection day.

5.1.11 Management of bulky waste will be overseen by the facility management team.

COMMERCIAL WASTE

5.1.12 Estimated waste generation metrics for the proposed commercial uses have been sourced from British Standard BS5906:2005.

5.1.13 As part of the contractual lease for the commercial units, occupiers will be required to provide suitable waste storage facilities during the fit-out phase, except for the light industry units where a communal waste store will be provided.

5.1.14 The commercial waste facilities must be designed to comply with all prevailing legislation and guidance.

5.1.15 The commercial waste stores will be sized in accordance with the chosen collection frequency and to meet the requirements of the business activity.

5.1.16 Except for the industrial joint waste store, the commercial tenants will be responsible for arranging the collection of their waste through a suitable commercial waste management contractor.

5.1.17 On collection days, the commercial waste contractor will position their RCV in a safe and legal loading position within close proximity to the commercial unit and collect the waste directly from the tenants' internal waste storage area.

5.1.18 Commercial tenants will not be permitted to present waste on the public highway.

5.2 CONCLUSION

5.2.1 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.

5.2.2 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)[2]

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 apply to the Proposed Development.

DCLG, NATIONAL PLANNING POLICY FOR WASTE (2014)[3]

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.

DEFRA, OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND (2018)[4]

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)[5]

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 apply 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**.

---

[2] MHCLG (2024) *National Planning Policy Framework*
https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf

[3] DCLG (2014) *National Planning Policy for Waste*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

[4] Defra (2018), *Our Waste, Our Resources: A Strategy for England*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

[5] DEFRA (2021), *Waste Management Plan for England*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955897/waste-management-plan-for-england-2021.pdf

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)[6]

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.

[6] HM Government (2018), *A Green Future: Our 25 Year Plan to Improve The Environment*
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)[7]

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)[8]

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.*

---

[7] GLA (2021) *The London Plan*
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

[8] 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)[9]

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)[10]

This document is the Joint Waste Plan for the London Boroughs of Brent, Ealing, Harrow, Hillington, 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)[11]

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

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

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

[11] LBH (2012) *Local Plan Part 1 https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal_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)[12];

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.

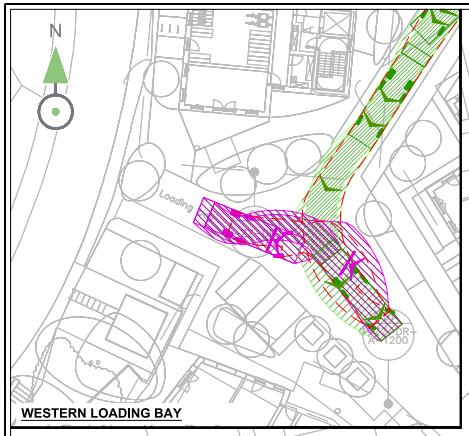
Policy MIN 4: *Re-use and Recycling of Aggregates* states that all developments are encouraged to:

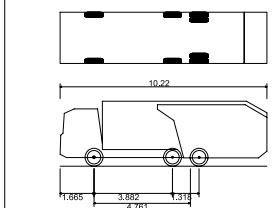
- Recycle and re-use construction, demolition and excavation waste as aggregates;
- Process and re-use recyclable material on-site, and where this is not possible, the material should be re-used at another site for land restoration; and
- Use substitute or recycled materials in new development in place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

[12] 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





Phoenix 2-20W (with Elite 2 6x2ML chassis)

Overall Length	10.220m
Overall Width	2.530m
Overall Body Height	3.211m
Min Body Ground Clearance	0.416m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	9.450m

1:500
0 10m 20m 30m 40m 50m

Rev	Date	Description	Drn	Chk	App
F	18/03/25	UPDATED BASE PLAN	HMC	DL	LB
E	06/01/25	UPDATED BASE PLAN	GSF	LB	LB
D	11/11/24	UPDATED BASE PLAN	GSF	LB	LB
C	30/09/24	UPDATED BASE PLAN, LOADING BAY HIGHWAY IMPROVEMENTS SHOWN.	AMG	LB	LB
B	04/06/24	UPDATED BASE PLAN	GSF	LB	LB
A	14/05/24	FIRST ISSUE	GSF	LB	LB

Rev	Date	Description	Drn	Chk	App
J	10/09/25	UPDATED BASE PLAN	HMC	DL	LB
I	20/06/25	UPDATED BASE PLAN	tZ	DL	LB
H	27/03/25	UPDATED BASE PLAN	GSF	DL	LB
G	24/03/25	UPDATED BASE PLAN	HMC	DL	LB

VELOCITY

Drawing Status	S2 - FOR INFORMATION
Client	
Architect	
Project Title	TROUT ROAD
Drawing Title	SWEPT PATH ANALYSIS OF RCV
Scale @ A1	1:500
Date	14/05/24
Designed/Drawn	GSF
Checked	LB
Approved	LB
Project Ref	24-119
Drawing Number	24-119-T-004
Rev	J

VELOCITY