FEBRUARY 2024

Operational Waste Management Strategy

3 The Square, Stockley Park, Hayes, Uxbridge, UB11 1ET

ICENI PROJECTS LIMITED ON BEHALF OF F&C COMMERCIAL PROPERTY HOLDINGS C/O COLUMBIA THREADNEEDLE REAL ESTATE PARTNERS

Iceni Projects Limited on behalf of F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate Partners

February 2024

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1.2 With reference to the policy requirements, guidance and industry best practice detailed in Section 3, anticipated arisings have been determined on the basis of relevant data and the proposed scheme. Waste storage areas and locations are subsequently set out in order to demonstrate compliance with local authority policy requirements and relevant standards.

1.3 The Proposed Development seeks to change the use of the existing vacant office building at the site to deliver a post-operative care facility. Whilst subject to confirmation, it is anticipated that the Proposed Development will produce approximately 3,150 kg of waste per week. Waste storage for the Proposed Development will consist of a range of separate containers for the collection of segregated waste streams, which will be collected by a contractual arrangement. The waste storage area will be located within the curtilage of the building for ease of use and to ensure accessibility for commercial waste collection operatives. It should be noted that whilst the projected volume of waste may change, the strategy for waste storage and collection will remain the same for all uses.

1.4 This Strategy therefore demonstrates that the Proposed Development has been designed to be compliant with all relevant waste management policy, and will manage and dispose of waste in a sustainable manner.

2. INTRODUCTION

2.1 Iceni Projects Ltd was commissioned by F&C Commercial Property Holdings c/o Columbia Threadneedle Real Estate Partners to produce an Operational Waste Management Strategy to support the planning application for the proposed redevelopment of 3 The Square, Stockley Park, Hayes, Uxbridge, UB11 1ET.

Report Objective

2.2 This document details the operational waste management measures adopted by the Proposed Development at the Land off Pier Road and gives an overview of the design proposals that will ensure that operational waste will be stored, collected and disposed of effectively over the lifespan of the scheme, within guidelines set out by the London Borough of Hillingdon.

2.3 The report is structured to meet these guidelines as follows:

- Section 3 discusses the planning context and policies which are relevant to operational waste management;
- Section 4 discusses the development response to the policy drivers for operational waste management; and
- Section 5 summarises the development's design response.

Site and Surroundings

2.4 The application site (Appendix A1) is located within the London Borough of Hillingdon, to the north of London Heathrow Airport. The site, which is situated within the Stockley Park business estate, is bounded by The Square to the south, an office building at 2 The Square to the west, and an office building at 4 The Square to the east, which is currently in use by Hikvision UK, as well as Hasbro UK and Hasbro European Services. The northern boundary of the site is formed by the Stockley Park Golf Course.

2.5 The application site itself currently comprises a vacant office building, with associated car parking and hard surfaces, that was previously used as the European headquarters for the Japanese electronics manufacturer, Canon. The surrounding area is characterised by business and office uses, with the Grade II listed Registered Park and Garden, Stockley Park, located to the northwest of the site, the Stockley Park Golf Club to the north, and the Lake Farm Country Park to the east.

The Proposed Development

2.6 The description of the development is as follows:

> *"Full planning permission for the change of use of existing office building (Use Class E, formerly Use Class B1) to a post-operative care facility (Use Class C2) and the provision of landscaping and associated works."*

3. PLANNING AND REGULATORY CONTEXT

3.1 The means of sorting, storing and collecting operational waste are incorporated within policy and regulation as set out below:

National

Health Technical Memorandum 07-01: Safe and sustainable management of healthcare waste (2022)

3.2 The Health Technical Memorandum 07-01: Safe and sustainable management of healthcare waste, published by the National Health Service (NHS) in 2022, sets out a framework for best practice waste management across the UK to help healthcare organisations and other healthcare waste producers meet legislative, technical and policy requirements. Best practice guidance is set out for both the safe and sustainable management of healthcare waste.

3.3 The following waste and environmental legislation that is relevant to the management of healthcare waste is set out within the Memorandum:

Table 3.1 Waste and environmental legislation relevant to the management of healthcare waste

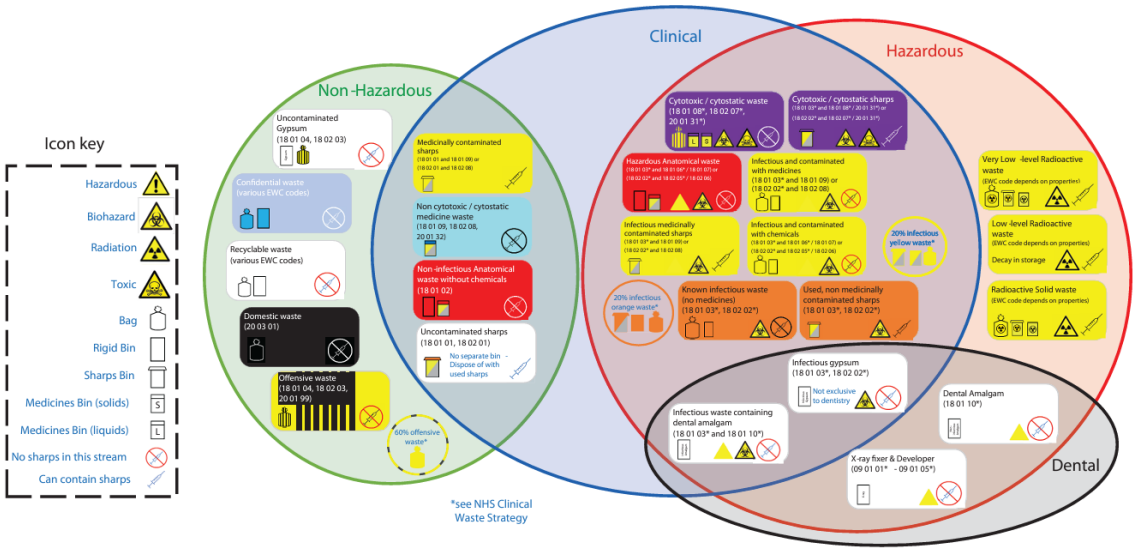
Legislation	Summary
The Misuse of Drugs (Safe Custody) Regulations	Requires controlled drugs other than those specified in Schedule One generally to be kept either in a locked safe or room or in a locked receptacle
The Environmental Protection Act	Defines that everyone who handles waste has a responsibility for its management and is required to fully comply with their own 'duty of care', including those who import, produce, hold or carry waste.
The Environmental Protection (Duty of Care) Regulations	These regulations define the terms Waste Producer, Waste Manager, Waste Broker and Waste Carrier, and set out the duties required of each relating to controlled wastes.
Radioactive Substances Act	Defines "radioactive material" and "radioactive waste", and governs the accumulation and disposal of radioactive substances, and the inspection of premises generating, storing or disposing of them.

Legislation	Summary
The Misuse of Drugs Regulations	The regulations set out the regime of control that governs the various legitimate clinical activities associated with controlled drugs, for example: • which professionals are allowed to prescribe, order, supply or administer the drugs • destruction and/or disposal procedures • associated record-keeping requirements.
The Hazardous Waste (England and Wales) Regulations	Defines and regulates the segregation and movement of hazardous waste in England and Wales from the point of production to the final point of disposal or recovery. The regulations cover any waste with properties that pose a threat to human health or the environment.
Waste Framework Directive	Provides additional labelling, record keeping, monitoring and control obligations from the “cradle to the grave”, in other words from the waste production to the final disposal or recovery. It also bans the mixing of hazardous waste with other categories of hazardous waste, and with non-hazardous waste.
Regulation (EC) No 1272/2008 of the European Parliament and of the Council	Regulation and standards on the classification, labelling and packaging of substances and mixtures. This includes definitions for classification of dangerous substances.
The Waste (England and Wales) Regulations	Producers must confirm that the waste management hierarchy has been applied when transferring waste and include a declaration to this effect on the waste transfer note or consignment note.
The Controlled Waste (England and Wales) Regulations	Gives legal definitions of “clinical waste” and “offensive waste”. Such wastes are regulated due to their toxicity, hazardous nature, and capacity to do harm to human health or the environment. This regulation gives a statutory obligation to ensure the waste is managed correctly to prevent harm.
The Ionising Radiations Regulations (IRR)	Medical ionising radiation is used widely in hospitals, dental care, clinics and in medical research to help diagnose and treat conditions. Examples are X-rays and nuclear scans, and treatments such as radiotherapy. The regulations aim to make sure that it is used safely to protect patients from the risk of harm when being exposed to ionising radiation.
The Ionising Radiation (Medical Exposure) Regulations (IR[ME]R)	Legislation which provides a framework intended to protect healthcare patients from the hazards associated with ionising radiation.

Legislation	Summary
The Waste (Circular Economy) Regulations	Aims to make sure fewer resources are sent to landfill if they can be reused or recycled. This will make steps towards a circular economy and resource optimisation by increasing a product's lifespan. It focuses on bringing resources back into circulation once a product has reached its end of life, so that parts can be reused or repurposed for new products.
The Environment Act	Sets out environmental targets, including for air quality, water, biodiversity and waste reduction. Adds legal responsibility to segregate waste streams (including food waste). Establishes the Office for Environmental Protection (OEP), with the responsibility to hold the government and other public bodies to account, and to ensure environmental regulations are obeyed.

3.4 The Memorandum sets out how healthcare waste should be managed, and includes the below figure which demonstrates the relationship between the waste types that may arise from healthcare facilities:

Figure 3.1 Relationship between waste types



3.5 With respect to the in-house management of waste, it is noted that all healthcare organisations should have a waste management policy or plan. This should set out all the organisation's facilities that generate healthcare waste and should include organisation-specific waste management guidance or training material.

3.6 In order to achieve a more sustainable waste management system, it is recommended that accurate segregation be practiced in all healthcare facilities, targeting the following:

- 20% of waste segregated to be sent to incineration, with only 4% of that being hazardous or clinical incineration;
- 20% of waste segregated to be sent to alternative treatment; and
- 60% of waste segregated to be classified as offensive waste.

3.7 Further information is contained within the Health Technical Memorandum 07-01: Safe and sustainable management of healthcare waste, available at: https://www.england.nhs.uk/publication/management-and-disposal-of-healthcare-waste-htm-07-01/

Regional

The London Plan (Adopted March 2021)

3.8 The London Plan outlines the Mayor's commitment to creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste, as this is not only socially and environmentally responsible, but will save money and limit the likelihood of environmental threats affecting London's future. The following London Plan policies are relevant to waste:

3.9 **Policy SI7 (Reducing waste and supporting the circular economy)** states that resource conservation, waste reduction, increase in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- Promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible;
- Encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of goods;
- Ensure that there is zero biodegradable or recyclable waste to landfill by 2026;
- Meet or exceed the municipal waste recycling target of 65 per cent by 2030;
- Meet or exceed the targets for each of the following waste and materials streams:
    - Construction and demolition – 95 per cent reuse/recycling/recovery
    - Excavation – 95 per cent beneficial use

- Design developments with adequate, flexible, and easily accessible storage space and collection systems and that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food waste, as well as residual waste.

Local

3.10 The 3 The Square, Stockley Park development is located in the London Borough of Hillingdon (LBH) and key LBH guidance and policy requirements are detailed below.

London Borough of Hillingdon Local Plan: Part 1 – Strategic Policies (November 2021)

3.11 **Strategic Objective 13 (SO13)** is to support the objectives of sustainable waste management.

3.12 **Policy EM11** (Sustainable Waste Management) states that the Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within the West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan which is 382 thousand tonnes per annum for Hillingdon by 2026.

3.13 The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

3.14 The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction. The Council will promote using waste as a resource and encouraging the re-use of materials and recycling. The Council will also support opportunities for energy recovery from waste and composting where appropriate. The Council will safeguard existing waste sites unless compensatory provision can be made.

3.15 The Council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.

London Borough of Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020)

3.16 **Policy DMBH 11 (Design of New Development)** states that development proposals should make sufficient storage provision in design and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

3.17 **Policy DMIN 4 (Re-use and Recycling of Aggregates)** states that the Council will promote the recycling of construction, demolition and excavation waste. All developments will be encouraged to:

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

4. OPERATIONAL WASTE MANAGEMENT

4.1 The operational waste management strategy for the Proposed Development has been assessed using the waste hierarchy methodology. This approach is consistent with that required by the Council, requiring new development to demonstrate how the scheme addresses waste separation, storage and collection.

4.2 For the Proposed Development, it is intended that a strategy utilising wheeled bins will be adopted. The adoption of this waste management strategy will ensure waste arising from the Proposed Development is managed in accordance with relevant legislation and guidance.

4.3 The Proposed Development seeks to change the use of the existing vacant office building on-site to deliver a post-operative care facility. Based on the information provided by Hale Architects Ltd, the approximate waste arisings from the Proposed Development are provided in the table below.

Table 4.1 Approximate weekly waste arising

Use	Number of beds	Daily waste volume per bed (kg)*	Weekly waste volume (kg)
Proposed Development	100	4.5	3,150

* Estimated based on an average generation of waste per bed per day reported by the NHS in March 2023.

4.4 Bins for the collection of segregated waste types will be provided within dedicated storage spaces at each level of the Proposed Development. At this stage, it is expected that following storage will be provided, where required:

Table 4.2 Waste storage provision

Waste stream	Colour of receptacle	Example items	Disposal method	Container requirements
Infectious, medical or anatomical waste requiring incineration or alternative treatment	Yellow	IV bags; pharmaceutically contaminated sharps; chemically contaminated lab waste	Incineration or alternative treatment at a suitably permitted facility	Dependent on characteristics of waste; may contain sharps in separate bin

Waste stream	Colour of receptacle	Example items	Disposal method	Container requirements
Known infectious	Orange	Infectious dressings; swabs; phlebotomy needles or syringes	Alternative treatment at a suitably permitted facility or incineration	Dependent on characteristics of waste; may contain sharps in separate bin
Offensive or hygiene waste	Yellow and Black	Used non-infectious PPE; couch roll (paper used to cover exam tables); non-infectious items contaminated with bodily fluids	Energy from Waste or landfill	Tiger stripe bags; must not contain sharps
Domestic or municipal	Black	Food packaging	Recycling, Energy from Waste or landfill	Black or clear bag; must not contain sharps
Recycling	White	Empty drink cans; glass; paper (excluding confidential)	Recycling	White or clear bag; must not contain sharps
Medicinal waste	Blue	Expired medicines; testing kits; medicines returned to healthcare facilities by the public	Incineration or specialist treatment	Blue lidded bin; must not contain sharps
Gypsum	White	Gypsum	Recovery if non-infectious or incineration	Marked white bin; infectious gypsum must be stored separately from non-infectious gypsum; must not contain sharps

Waste stream	Colour of receptacle	Example items	Disposal method	Container requirements
Radioactive	Yellow and black with trefoil symbol	Nuclear medicine waste; radiation contaminated PPE	Decay storage (for low level radioactive wastes); aqueous waste disposal to sewers; or specialist disposal (for radioactive wastes which cannot be decayed on-site).	Standard bins or bags labelled with trefoil symbol and word 'radioactive'; once decayed, radioactive tape to be removed before disposal of waste via standard waste streams; may contain sharps in separate bin
Confidential	Blue	Paperwork containing patient data or commercially sensitive information	Shredding followed by recycling	Bag, rigid bin or console; must not contain sharps

4.5 The exact number and dimensions of the receptacles to be provided for the Proposed Development are subject to confirmation. However, it is noted that the spaces set aside for the centralised waste storage areas will be of sufficient size for the provision of the necessary waste collection receptacles.

4.6 Waste will be collected and managed by a suitable waste contractor during operation, with the frequency of waste collections to be informed by demand during operation.

4.7 A number of measures proposed to minimise the volumes of waste arising from the Proposed Development, and to ensure as much waste is diverted from landfill during operation as possible, are outlined in Appendix A2.

4.8 At this stage, it is expected that all waste containers will be stored under cover in specially designed waste storage rooms, or store. The walls and roofs of the stores will be formed of non-combustible, robust, secure and impervious material, with a steel door. The materials used to construct the waste stores will have a fire resistance compliant with the relevant industry standards and legislation.

4.9 Further to these requirements, additional measures have been considered in the design of the waste stores to help maintain a compliant waste strategy for the operation of the Proposed Development:

- All containers for waste will be easily accessible to both the staff and waste collector;
- Waste stores have been designed and located in such a way as to limit potential noise disturbance to future site users;
- Storage areas for waste and recycling will be clearly designated for this use only, by a suitable door or wall sign and, where appropriate, with floor markings;
- Waste storage sites will include areas for instructional signage detailing correct use of the facilities;
- The entrance of the waste storage rooms will be free from steps and projections;
- Adequate ventilation will be provided, with permanent ventilators giving a total ventilation area of no less than 0.2m^2; and
- Electrical lighting will include sealed bulkhead fittings (housings rated to IP65 in BS EN 60529:1992 (Ref. 43)) for the purpose of cleaning down with hoses and inevitable splashing. Luminaires will be low energy light fittings or low energy lamp bulbs, controlled by proximity detection or a time delay button to prevent lights being left on.

4.10 As noted above, the projected volume of waste arising calculated here may change. However, the strategy for the storage and collection of waste, whereby waste is stored in separate, designated receptacles within dedicated waste storage areas and is collected by contractual arrangement, will remain the same.

5. CONCLUSION

5.1 With reference to the policy requirements, guidance and industry best practice detailed in Section 3, a comprehensive Operational Waste Management Strategy has been defined for the Proposed Development.

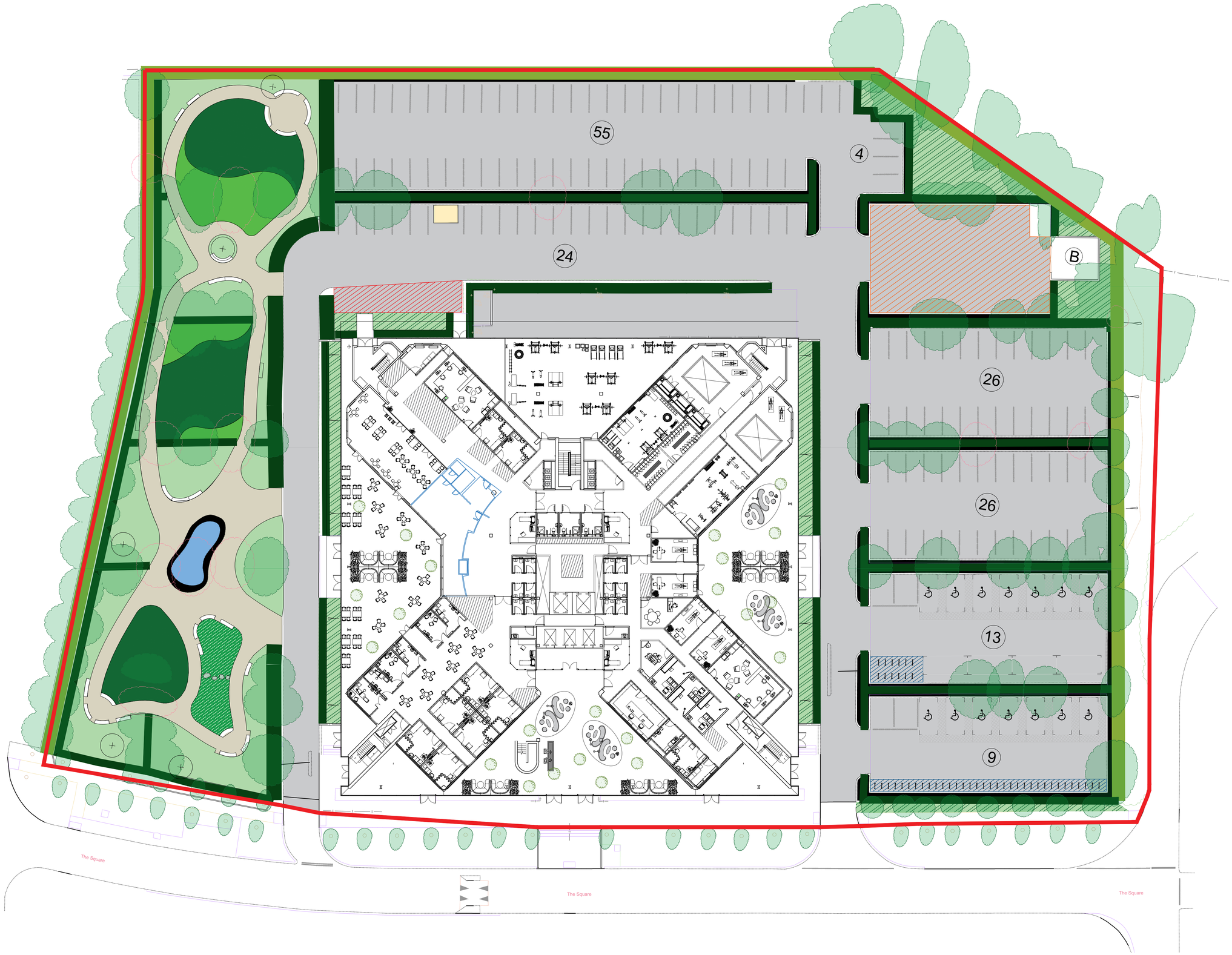
5.2 The Proposed Development has been designed with high standards of waste management performance. This strategy describes the consideration that has been given to waste generated by the Proposed Development during its operation, including how it will be sorted, stored and collected, therefore contributing towards the Council's targets for waste minimisation, recycling and reuse.

5.3 The strategy has been prepared to demonstrate that future staff and users of the Proposed Development will be provided with convenient and effective waste management systems that will promote high levels of recycling and ease of collection by the designated waste collection operatives.

5.4 The Proposed Development seeks to change the use of the existing vacant office building at the site to deliver a post-operative care facility. Whilst subject to confirmation, it is anticipated that the Proposed Development will produce approximately 3,150 kg of waste per week. Waste storage for the Proposed Development will consist of a range of separate containers for the collection of segregated waste streams, which will be collected by a contractual arrangement. The waste storage area will be located within the curtilage of the building for ease of use and to ensure accessibility for commercial waste collection operatives. It should be noted that whilst the projected volume of waste may change, the strategy for waste storage and collection will remain the same for all uses.

5.5 This Strategy therefore demonstrates that the Proposed Development has also been designed to be compliant with all relevant waste management policy, and will manage and dispose of waste in a sustainable manner.

A1. SITE PLAN



01 Existing Site Plan
1:250 @ A1

Disclaimer:

© All information shown is subject to survey, drawings and information within is for diagramatic visualization and should not be used for construction purposes. Measure all dimensions on site for verification of data

Notes:

- Site Boundary Line (13,700sqm/3.38 acres)
- Proposed External works to form Restorative garden
- Proposed External works to form Pedestrian Pavillion
- Proposed Ambulance Bay
- Proposed Cycle Parking - 46 Sheffield Stands
- Proposed Vehicle Delivery Set down + Refuse Delivery set down
- B - Proposed Vehicle Delivery Set down + Refuse Delivery set down
- Total Parking = 157
  Net loss of Parking = 124

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02	Issued for draft DAS	25.01.2024	RS	HA
01	First Issue	06.06.2023	JA	HA

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Client:

COLUMBIA THREADNEEDLE INVESTMENTS

hale
ARCHITECTURE
22c Leathermarket Street, London, SE1 3HP

Project:
3 The Square, Stockley Park

Drawing Title:
Proposed General Arrangement Site Plan

Project No:	Scale @ A1/A3:	Revision:
21087	1:250/1:500	02

Drawing No:
21087-HALE-XX-00-DR-A-1002

A2. WASTE AND RESOURCE MANAGEMENT PRINCIPLES

Waste Type	Description	Waste prevention, resource efficiency and circular economy implementation	Waste segregation, storage, handling and collection	Recover, treatment and disposal
Non-hazardous residual waste	General waste of the type produced by households. Often consists of food scraps (where not processed as a separate waste stream), non-recyclable plastics, packaging, non-infectious textiles, and small amounts of inorganic materials, such as stone. Represents waste that is left once all other efforts have been made to prevent, reuse, recycle or recover materials.	• Switching from single-use items (such as paper cups) to reusable equivalents (glass or ceramic cups) • Waste and recycling bins should be placed strategically and paired wherever possible. Bins should be placed in locations where they are likely to be needed and should ideally be placed so that one is always in view • Provide recycled plastic cups for use with vending machines and/or encourage staff to use reusable mugs.	Recyclables and residual general wastes can be stored in the same room but should be stored in separate designated bins. It is recommended that residual waste is stored in black bins, although clear/opaque receptacles may also be used. Hazardous wastes (including some deodorants, batteries etc.) and clinical wastes should never be placed in the black-bag residual waste stream.	A waste contractor may be appointed to collect and dispose of residual waste. Typically, residual waste may be incinerated, landfilled or sent to a materials recovery facility (MRF) to have any recyclable content recovered from it.

Organic waste	Organic waste, such as food waste from kitchens, green landscaping waste from grounds maintenance and floral displays	• Ensuring a robust system for measuring food waste from difference sources (kitchen waste, plate waste, unserved meals), so that prevention interventions can be identified
		• Sending back reusable items to suppliers where possible
		• Utilising “just in time” procurement for goods and examining sales patterns, to avoid over-purchasing
		• Utilising digital meal ordering systems in hospitals, enabling healthcare and catering teams to adapt food provision to patient needs, manage allergies and diets, and minimise waste
		• Considering the possibility of entering a “back-of-store” surplus food partnership with a local charity so that any surplus food waste generated could be put to good use.
		• Selecting plant landscaping that requires low maintenance and produces less waste
		• Working with in-house catering staff or contractors to identify opportunities to reduce food waste through:
		  • control of ordering for working lunches
		  • active management of the quantities cooked in canteens
		  • control of stock ordering menus that make use of ‘leftovers’
			Should be collected separately at source (kitchen and cafeteria) and kept separate.
			
			Waste should not be stored on site for extended periods, with at least daily removal of food waste recommended
				Organic waste may be sent to a composting or anaerobic digestion (AD) facility for energy and/ or fertiliser generation. Organic waste may also be treated on-site through several methods.
				
				In-Vessel Composting (IVC) can be used to treat wastes that have biosecurity or odour issues and facilitate pathogen destruction, such as food wastes.

Recyclable waste	Items such as non-infectious / non-chemically contaminated glass, including bottles, jars, glassware, and noncontaminated vials; plastics, such as	• Waste and recycling bins should be placed strategically and paired wherever possible. Bins should be placed in locations where they are likely to be needed and should ideally be placed so that one is always in view.	It is recommended that dry recyclables are separated at source and collected separately.	The preferred option is for this waste stream to be collected by the local government authority or

Waste Type	Description	Waste prevention, resource efficiency and circular economy implementation	Waste segregation, storage, handling and collection	Recover, treatment and disposal
	PET and HDPE bottles, food containers, bottles, and cups; polystyrene packaging, and metals such as aluminium, and ferrous drink cans, food tin cans, other metal containers such as empty paint containers. Noncontaminated paper and cardboard waste (packaging waste, office paper, newspapers, magazines etc). Recyclable in most areas.	• Sending back reusable items to suppliers where possible • Utilising 'just in time' procurement for goods and examining sales patterns, to avoid over-purchasing (leading to food products unnecessarily being thrown away) • Reducing the amount of packaging used to ship or transport products; for instance, switching from carton-less bottles or using multi-month packs • Ensuring a returns policy is in place with suppliers for unsold and damaged goods • Storing and reusing cardboard shipping boxes • Training staff on how to properly handle packaging and avoid contamination in order to allow for reuse, in addition to ensuring that incoming packaging is segregated for recycling • Bulk buying items such as office supplies to reduce the amount of packaging • Avoiding colour printing whenever possible • Setting double-sided printing as the default option for photocopiers and staff computers, and raising awareness of this with staff to discourage single-sided printing • Using single spacing and narrower margins for less important documents • Reusing out-of-date headed paper and wasted printouts as scrap/notebooks • "Unsubscribing" from senders of junk mail	Bins for recyclable waste should be clustered, clearly marked, and present in areas of high waste generation and high footfall (waiting rooms, reception, corridors, cafeterias etc). Should be kept separate from nonrecyclable wastes to avoid cross contamination.	waste contractor for recycling at a permitted and licensed facility. Mixed recyclables can be sorted and separated at MRFs. Source segregated materials can be sent directly to re-processors for recycling, provided there is little contamination. Stationery and office paper may be returned to the supplier if unused or undamaged.
Waste Electronic and Electrical Equipment (WEEE)	• IT equipment (computers, monitors, printers, keyboards etc) • Specialist equipment (coagulators, centrifuges, audiometry equipment, dialysis equipment, cardiology equipment, microscopes, autoclaves, mobile digital X-ray equipment, oscilloscopes etc) • Bulky equipment (refrigerators, freezers, biosafety cabinets, televisions, washing machines, fans, microwaves, cookers etc) • Implanted devices (pacemakers) • Lighting equipment (fluorescent tubes/bulbs)	• Sending back reusable items to suppliers where possible • Ensuring a returns policy is in place with suppliers for unsold and damaged goods • Investing, where possible, in high-quality equipment that is durable and repairable • Switching from analogue to digital X-ray systems to eliminate the stream of hazardous fixer, developer, and film • Considering renting equipment that is used only occasionally rather than having to store, maintain and calibrate it in the workplace • Not allowing obsolete equipment to take up space and collect dust. The sooner it is recycled, the quicker that valuable resources will be available for reuse, thus avoiding the processing of more virgin materials • Allocating space in the central waste storage area for bulky items prior to collection/reuse.	WEEE should be stored in a safe, secure area. Care should be taken to ensure that equipment that may be capable of repair and reuse is not further damaged in storage. Compliance schemes and waste management companies that collect WEEE may require that it be separated in a certain way. Waste storage areas for WEEE will require appropriate firefighting methods as water will not be typically used in such environments. Batteries should be segregated and collected separately. The waste receptable should be clearly labelled with the	Electronics can be hazardous to the environment and should be returned to the manufacturer for disposal / recycling where possible (as in the case of certain medical / laboratory electronics) or handed off to a designated government agency or specialist contractor. WEEE should be sent to specialist WEEE recyclers to ensure environmentally friendly and safe disposal. Simpler / non-laboratory WEEE can be repaired and / or donated (for

Waste Type	Description	Waste prevention, resource efficiency and circular economy implementation	Waste segregation, storage, handling and collection	Recover, treatment and disposal
	• All other electronics, and electrical equipment (radios, speakers, monitoring and control equipment such as thermostats, smoke detectors and heating regulators etc) • Batteries	• Developing a procurement policy which explicitly precludes purchasing products that contain toxic materials such as mercury, PVC, or glutaraldehyde; and setting progressive targets for those which cannot yet be eliminated. • Sending back reusable items to suppliers where possible. • Ordering only from suppliers who provide rapid delivery of small orders and who accept the return of unopened stock • Provide separate storage receptacles in waste storage rooms for batteries	type of waste and the name of the major chemicals, with any necessary hazard labels attached to corrosive, flammable, explosive or toxic chemicals. The liquid contents of batteries should never be mixed or disposed of down the drain but should be stored in strong leak-proof containers. Where Healthcare facilities provide recycling bins for batteries, they will be required to comply with the requirements of the Hazardous Waste Regulations and the Carriage Regulations, which establish special rules for packaging	instance in the case of outdated IT equipment). Disposal of electronic equipment will need to be in accordance with the Waste Electrical and Electronic Equipment Regulations and, if hazardous, the Hazardous/ Special Waste Regulations.
Gypsum and plaster casts	Gypsum-rich wastes are likely to be produced from: • plaster casts and related materials in accident and emergency departments, fracture clinics, and perhaps veterinary surgeries. • plaster models in dental practices and similar units in hospitals. They may also be produced by chiropodists/ podiatrists.	Limited opportunities given healthcare need.	The vast majority of plaster casts and models are not infectious and must not be placed in the clinical waste stream. Gypsum plaster casts should not be placed in the offensive waste stream either. These should be segregated as a specific 18 01 04 gypsum waste stream.	These materials, if they enter a normal landfill with other waste including residues from clinical waste disposal, may produce hydrogen sulphide gas. For this reason, it is prohibited from landfill. The two main disposal options for noncontaminated gypsum wastes are: • gypsum recycling • hazardous waste landfill Procedures should be put in place to identify and segregate the small proportion that is genuinely contaminated and poses a risk of infection – this may then be disposed of in the orange bag.
Non-clinical chemicals	Heavy metals contained in medical devices, such as mercury in broken thermometers, aerosols, POPs, hand	• Developing a procurement policy which explicitly precludes purchasing products that contain toxic materials such as mercury, PVC, or	Hazardous chemical wastes of different composition should be stored separately to avoid unwanted chemical reactions.	Less hazardous chemical wastes may be diluted and disposed of using sewage/wastewater

Waste Type	Description	Waste prevention, resource efficiency and circular economy implementation	Waste segregation, storage, handling and collection	Recover, treatment and disposal

	gels, cleaning materials, bleaches, varnishes etc	glutaraldehyde; and setting progressive targets for those which cannot yet be eliminated.
		• Sending back reusable items to suppliers where possible.
		• Using minimum concentrations of chemicals where possible
		• Centralised purchasing of hazardous chemicals
		• Monitoring of chemical flows within the health facility from receipt as raw materials to disposal as hazardous wastes
		• Ordering only from suppliers who provide rapid delivery of small orders and who accept the return of unopened stock
		• Preventing the accumulation of significant quantities of outdated chemical products by:
		  • Regularly ordering smaller quantities of product rather than in bulk and all in one go
		  • Using the oldest batch of a product first • Using all the contents of each container
		  • Checking the expiry date of all products at the time of delivery.
		• Provide storage receptacles in waste storage rooms for unused discarded hazardous chemicals for example bleaches, varnishes, etc.
			Waste storage areas for chemicals will require appropriate firefighting methods as water will not be typically used in such environments.
			
			Care should be taken to ensure that liquid chemical wastes are never disposed of down the drain.
			
			A liquid and chemical resistant sump should be provided in areas set aside for washing of bins containing chemical wastes.
			
			Chemical waste must be collected in strong leak-proof containers that resist reaction with the type of chemical it hosts, labelled accordingly, never mixed with other chemicals, and sent to specialized treatment facilities (if available).
			
			The characteristics of different chemicals should be carefully considered prior to storage and subsequent disposal, taking into account flammability, corrosivity and explosivity. A separate zone should be allocated in the central waste storage area for storage of chemical waste, with further separation recommended depending on the hazard class. The central waste storage area should be equipped with adequate lighting and ventilation, spillage kits, PPE and first aid equipment.
			
			The chemical waste storage zone in the central waste storage area should be built with materials that are able to withstand explosion or leakage. Liquid and solid chemical wastes should be segregated. For storage of liquid chemicals, it is recommended that a chemical-proof sump is incorporated into the storage system. If this is not possible, then catch-containers should be placed under the storage containers to collect any leaked liquids. Packaging used for the storage and off-site transport of
				drains. Larger quantities and more hazardous chemical wastes will require more advanced treatment. Where possible, chemical wastes should be returned to the supplier, or passed on to a licensed contractor, or suitable government body for disposal.
				
				Large amounts of chemical waste should not be buried, because they may leak from their containers, overwhelm the natural attenuation process provided by the surrounding waste and soils, and contaminate water sources.

Waste Type	Description	Waste prevention, resource efficiency and circular economy implementation	Waste segregation, storage, handling and collection	Recover, treatment and disposal
			chemical waste should be appropriately labelled, indicating the hazardous class, date and point of generation, where possible. Alcohol hand gels that do not contain siloxanes (which cause significant damage to plant and equipment used in the sewage treatment process) and which is not prohibited to be discharged to the sewer may be rinsed out and the packaging recycled or placed into the domestic waste stream.	
Disability aids/ walking aids	Disability aids/ walking aids	• Ensuring a returns policy is in place for patients to return aids at the end of the patient's care needs. • Implement an internal reuse scheme with in-house refurbishment or a reuse service contract with suppliers for returned aids. • Forming relationships with charities/other organisations that may be able to accept donations of disability aids (charities, local schemes/organisations) • When they have reached the end of their useful life, these items should be handled in accordance with the Waste Hierarchy • Examine procurement and ordering practices to reduce overordering, and maximise return and reuse schemes. • Examine the disability aids used in the organisation, and see if there is scope to refurbish/ make them suitable for use in accordance with the principles of Circular Economy .	Aids should be stored in a designated weatherproof area away from hazardous materials and other wastes. These items do not need to be stored in a bin unless there is a reason to do so (for instance if a large quantity of devices is being organised). Returned aids should be segregated from refurbished devices to retain resources and value. It is suggested separate storage containers or areas for aids that have been returned (before sorting), cleaned and pending further assessment, suitable for repair or refurbishment, and requiring recovery/treatment/disposal. Refurbished aids should be stored in pairs.	Adequate space and equipment for refurbishment should be made available when disability aids/ walking aids are repaired or refurbished by NHS organisations. Such as workstations and storage of tools and equipment. The manufacturer of the device should be contacted to establish whether a "take-back" scheme exists for this equipment. Used disability aids could also be donated to local charities which may be accept the devices for reuse, refurbishment, or recycling. Many of the components are likely to be recyclable, with potential for income. Damaged aids should be delivered to a local recycling facility.

A3. GENERAL NOTES

A3.1 The report is based on information available at the time of the writing and discussions with the client during any project meetings. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Iceni Projects Ltd for inaccuracies in the data supplied by any other party.

A3.2 The review of planning policy and other requirements does not constitute a detailed review. Its purpose is as a guide to provide the context for the development and to determine the likely requirements of the Local Authority.

A3.3 No site visits have been carried out, unless otherwise specified.

A3.4 This report is prepared and written in the context of an agreed scope of work and should not be used in a different context. Furthermore, new information, improved practices and changes in guidance may necessitate a re-interpretation of the report in whole or in part after its original submission.

A3.5 The copyright in the written materials shall remain the property of Iceni Projects Ltd but with a royalty-free perpetual licence to the client deemed to be granted on payment in full to Iceni Projects Ltd by the client of the outstanding amounts.

A3.6 The report is provided for sole use by the Client and is confidential to them and their professional advisors. No responsibility whatsoever for the contents of the report will be accepted to any person other than the client, unless otherwise agreed.

A3.7 These terms apply in addition to the Iceni Projects Ltd "Standard Terms of Business" (or in addition to another written contract which may be in place instead thereof) unless specifically agreed in writing. (In the event of a conflict between these terms and the said Standard Terms of Business the said Standard Terms of Business shall prevail). In the absence of such a written contract the Standard Terms of Business will apply.