LAND AT AUSTIN ROAD, HAYES

OPERATIONAL WASTE MANAGEMENT STRATEGY

PROJECT NO. 25-242 DOC NO. D012

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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 the London Borough of Hillingdon ('LBH) ('the Applicant') in support of a Reserved Matters Application (RMA) for Land at Austin Road, pursuant to Condition 1 of the hybrid permission for the site. A Section 73 application (application ref: 76550/APP/2025/2864) is currently pending and will be determined prior to the revised wording of the planning conditions proposed within the Section 73 application.

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.

1.1.3 This OWMS has been prepared to partially discharge planning condition 47 attached to the planning permission which is replicated below:

> *'Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.*
>
> *REASON*
>
> *In the interests of sustainable waste management and in order to maximise the re-use of material in accordance with Policy SI7 and D3 of the London Plan.'*

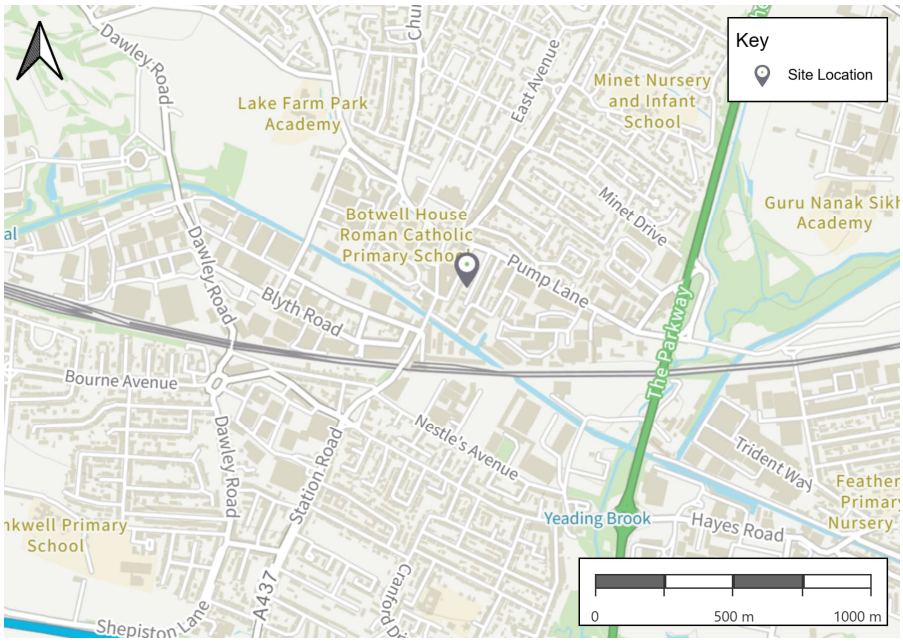
1.2 SITE DESCRIPTION

1.2.1 The site covers Development Zones 2 and 3. The original wider state consisted of three and five storey buildings (flats and maisonettes), with a high-rise tower of 15 storeys. In total, there were 260 homes within the estate at the time of the consent, comprising 1-, 2-and 3-bedroom homes. In addition, there is 115 sqm of community space within Skeffington Court. This RMA follows the completion of Phase 1, a new apartment building of 80 homes, located at the northern end of the estate.

1.2.2 The proposed scheme is for Phases 2 and 3 of the Hayes Town Centre Estate development providing 239 new homes. Phase 2 is a row of ten mews style houses, split into three groupings, with landscaping between, whilst Phase 3 is arranged across four main blocks of varying heights up to nine storeys with a row of townhouses fronting Austin Road.

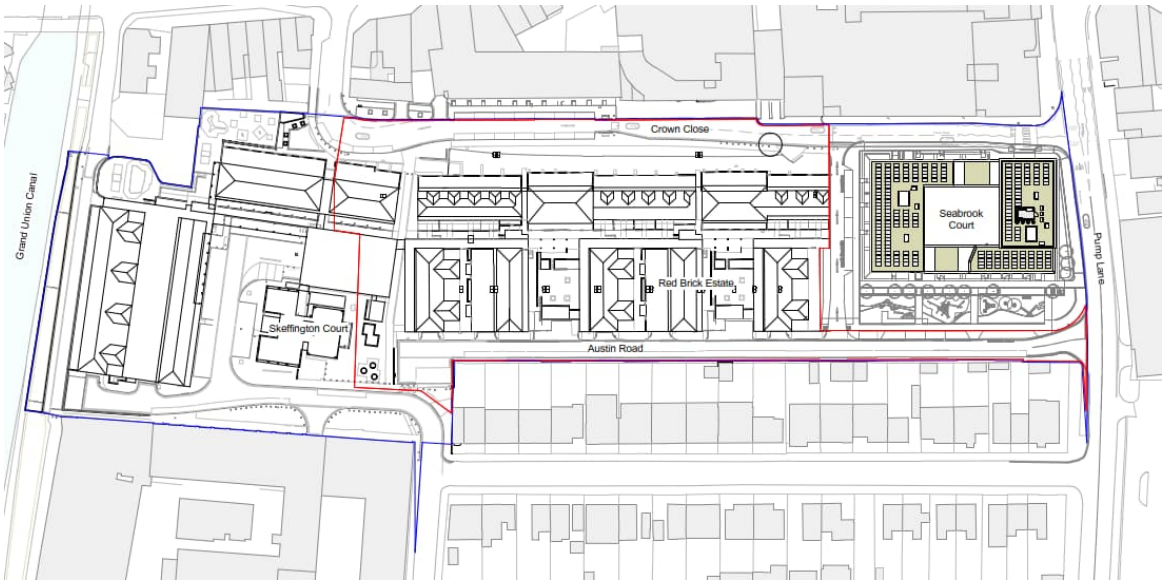
1.2.3 Figure 1-1 below shows the site location.

Figure 1-1 Site Location



1.2.4 Figure 1-2 shows the extent of the hybrid planning application boundary (shown in blue) and the reserved matters application boundary (shown in red).

Figure 1-2 Site Location Plan



1.3 PROPOSED DEVELOPMENT

1.3.1 The Proposed Development is described as follows:

"Submission of Reserved Matters Application (Access, Appearance, Landscaping, Layout and Scale) pursuant to Condition 1 of Application ref: 76550/APP/2025/2864 (Outline permission (with all matters reserved) for residential floorspace (Class C3) including demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development) for the erection of dwellings and community floorspace with associated landscaping and amenity space, parking, access and associated works."

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 Community Centre Waste – provides an estimate of non-residential 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 2025 – These regulations came into force on 31 March 2025, revising how household and commercial recyclable and organic waste is managed. They introduce exemptions under the Environmental Protection Act 1990 so that waste collection authorities may collect metal, glass, and plastic together, and for households, food waste and garden waste together, without needing to satisfy the usual justification tests. Businesses defined as micro-firms (fewer than 10 full-time equivalent employees) are exempt from the stricter separation requirements until 31 March 2027.

2.2.3 The Waste (Circular Economy) (Amendment) Regulations 2020 – These regulations came into force on 1 October 2020 and amended a raft of primary and secondary legislation on waste, to introduce a revised legislative framework to support the EU's Circular Economy Package (CEP), identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.

2.2.4 Waste Management, The Duty of Care Code of Practice (2018 update) - This code of 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. It is expected that LBH will introduce a weekly food waste collection service to every property across the borough to comply with recent legislation.

2.4.9 This legislation may also potentially require LBH to separate paper and card from other materials within the DMR stream. 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).

2.4.10 If 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 0.32 tonnes of waste per annum.

2.4.12 A total of 85 tonnes of municipal waste is estimated to be generated by the Proposed Development per annum once operational based on the average tonnage per household for the borough for residential waste and storage capacity and proposed collection frequencies for non-residential waste.

2.4.13 It is anticipated that the volume of waste generated by the non-residential element will be significantly less than estimated as the calculation assumes 100% fill levels of all containers on site.

2.4.14 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).

2.4.15 Table 2-1 below details the facilities used by LBH for management of residential waste.

Table 2-1 Residential Waste Disposal Facilities

Contractor	Facility Type	Permit Number	Address	Contact	Distance (Miles)	EWC Codes
Grundon Waste Management Limited	EfW	BT2866IG	Grundon Waste Management Ltd, Lakeside Road, Colnbrook, Slough, Buckinghamshire, SL3 0EG	01753 688430	5.6	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry - Mixed Municipal Waste (03 01)
Suez Advanced Solutions Limited	EfW	EPR/ZP393 7KL	Severnside Energy Recovery Centre, Severn Road, Bristol, South Gloucestershire, BS10 7GB	0117 938 1229	112	
N&P Crayford MRF Limited	MRF	KB3806FD	Crayford MRF Century Wharf, Crayford Creek, Crayford, Dartford, Kent, DA1 4HQ	01322 337770	62.5	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)
Riverside AD Limited	AD	EPR/AB33 07LK	Riverside AD Facility 43, Willow Lane, Mitcham, Surrey, CR4 4NA	0333 900 9333	20.2	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry – Biodegradable Kitchen and Canteen Waste (01 08)
Suez Recycling and Recovery UK Limited	WTS	AB3605FM	Victoria Road Waste Transfer Station, Victoria Road, South Ruislip, Middlesex, HA4 0YS	020 8329 1030	5.6	20 – Mixed Municipal Waste and Similar Materials from Commerce and Industry - Paper and Cardboard (01 01) Glass (01 02) Plastics (01 39) Biodegradable Kitchen and Canteen Waste (01 08) Metals (01 40) Mixed Municipal Waste (03 01)
		AB3709CF	Transport Avenue Transfer Station, Transport Avenue, Brentford, Middlesex, TW8 9HF	020 8568 7836	6.5	

2.4.16 Table 2-2 below details the licenced waste facilities that could accept the non-residential waste generated by the Proposed Development.

Table 2-2 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	19.7	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	21.9	
Grundon Waste Management Limited	EfW	BT2866IG	Grundon Waste Management Ltd, Lakeside Road, Colnbrook, Slough, Buckinghamshire, SL3 0EG	01753 688430	5.8	
Biffa Waste Management North London	MRF / WTS	HP3098EW	Unit 2, 12 Ardra Road, Enfield, London N9 0BD	0800 307 307	22.0	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	33.1	
Recorra Recycling Facility	MRF / WTS	EB3135AD	Units 38-39, Juliette Way, Purfleet Ind Park, Purfleet, Essex, RM15 4YA	0207 442 2202	38.0	
Veolia	MRF / WTS	DP3390EL	Greenwich Integrated Waste Management Facility, Nathan Way, Plumstead Marsh, City of London, London, SE28 0AF	07463 225762	41.0	
Refood Ltd	AD	AP3938EJ	London Sustainable Industries Park, Choats Rd, Barking, Dagenham RM9 6LF	0800 011 3214	34.2	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	30.1	

OPERATIONAL WASTE REPORTING

2.4.17 The building operator 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

2.4.18 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.

2.4.19 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.

2.4.20 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 residential blocks and individual dwellings.

3.1.2 LBH do not provide published guidance relating to design of waste management facilities within new developments. In the absence of dedicated guidance, this strategy has been developed in accordance with standards provided by LBH Officers and British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice* (hereafter 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	Collected weekly in 23-litre caddies
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: New Years Green Lane Harefield UB9 6LX

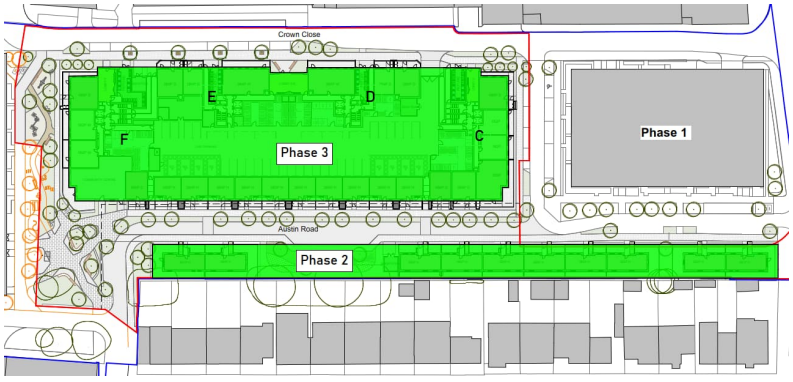
3.3 PRE-APPLICATION

3.3.1 The principles and strategies of residential waste storage and collection for the Proposed Development have been discussed and agreed during a pre-application meeting held on 14th October 2025 with the Recycling Team Leader in the LBH Waste Services Team.

3.4 PROPOSED DEVELOPMENT

3.4.1 Figure 3-1 below shows the configuration of the Proposed Development.

Figure 3-1 Proposed Development Configuration



3.4.2 Table 3-2 below summarises the accommodation schedule for the Proposed Development.

Table 3-2 Accommodation Schedule

Phase	Core	Tenure	Number of Units							Total	No. of Beds
			1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	4B6/7/8P		
3	Phase 3 GF	Social Rent	-	-	2	-	13	-	4	19	59
	C	Private	8	4	8	-	8	-	-	28	56
	C	Social Rent	8	3	7	-	7	-	-	25	49
	D		17	1	18	1	8	1	-	46	85
	E		23	1	18	1	8	1	-	52	91
	F		12	20	13	-	12	2	-	59	120
2	Phase 2 Houses	Social Rent	-	-	-	-	8	-	2	10	32
Total			68	29	66	2	64	4	6	239	492

3.5 PROPOSED WASTE MANAGEMENT STRATEGY

3.5.1 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.

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

- Internal Residential Waste Storage (Refer to Section 3.6);
- Residential Waste Management Strategy (Refer to Section 3.7); and
- Bulky Waste (Refer to Section 3.8).

3.6 INTERNAL RESIDENTIAL WASTE STORAGE

3.6.1 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.

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

Figure 3-2 Example Segregated Kitchen Bin[1]

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

- Residual Waste: 20 litres; and
- Recyclables: 20 litres.

3.6.4 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.

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

Figure 3-3 Example Food Waste Caddy

3.7 RESIDENTIAL WASTE STRATEGY

3.7.1 The following section sets out the waste strategy for the Proposed Development, which comprises individual dwellings and properties with communal waste storage.

[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=DMPAqBtGW4gAAAFP5sY4Inbm&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

INDIVIDUAL DWELLINGS

3.7.2 As part of the Proposed Development, individual ground-floor residential units within Phase 3, together with mews-style house located in Phase 2, will each be served by their own dedicated waste storage facilities.

3.7.3 The following section details the residential waste strategy for the individual dwellings within the Proposed Development. The properties all have ground level access.

3.7.4 The individual dwellings receiving kerbside collections are shown in green in Figure 3-4 below.

Figure 3-4 Individual Dwellings

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

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

Table 3-3 LBH Storage Requirements - Individual Dwellings

Residual Waste	DMR	Food
90-Litres	90-Litres	23-Litre Green Caddy

3.7.7 Each unit will be provided with sufficient space to store the containers summarised in Table 3-3 within their curtilage.

3.7.8 Prior to collection, residents will present their individual sacks at the end of their property boundary or adjacent to the pavement no earlier than 5:30pm on the day before.

3.7.9 The LBH Refuse Collection Vehicle (RCV) will stop adjacent to the presented sacks as part of an ongoing rolling stop and the collection operatives will transfer the sacks into the rear of the vehicle.

COMMUNAL PROPERTIES

3.7.10 Most of the residential units within the Proposed Development will be provided with access to communal waste storage facilities.

ESTIMATED WASTE GENERATION

3.7.11 Table 3-4 below shows the accommodation schedule for residential units provided with communal waste storage.

Table 3-4 Accommodation Schedule - Communal Waste Storage

Phase	Core	Tenure	Number of Units						Total	No. of Beds
			1B2P	2B3P	2B4P	3B4P	3B5P	4B6P		
3	C	Private & Social Rent	16	7	15	-	15	-	53	105
	D	Social Rent	17	1	18	1	8	1	46	85
	E		23	1	18	1	8	1	52	91
	F		12	20	13	-	12	2	59	120
Total			68	29	64	2	43	4	210	401

3.7.12 Table 3-5 below details the LBH residential waste metrics for properties with communal waste storage, as agreed with the LBH Recycling Team.

Table 3-5 Residential Waste Metrics – Waste Storage

Unit Type	Storage Provision (Litres)		
	Residual Waste	DMR	Food Waste
1-Bed	60	60	10
2-Bed	120	120	
3-Bed	240	240	
4-Bed	360	360	

3.7.13 Applying the waste metric summarised in Table 3-5 to the accommodation schedule in Table 3-4, Table 3-6 below summarises the estimated weekly waste generation for the Proposed Development once operational.

Table 3-6 Estimated Weekly Waste Generation - Communal Waste Storage

Core	Tenure	Weekly Waste Generation (Litres)			
		Residual Waste	DMR	Food Waste	Total
C	Private & Social Rent	6,300	6,300	530	13,130
D	Social Rent	5,100	5,100	460	10,660
E		5,460	5,460	520	11,440
F		7,200	7,200	590	14,990
Total		24,060	24,060	2,100	50,220

WASTE STORAGE

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

3.7.15 Residual waste and DMR will be stored in 1,100-litre Eurobins, an example of which is shown in Figure 3-5 below.

Figure 3-5 Example 1,100-Litre Eurobin

3.7.16 Food waste will be stored in 140-litre wheeled bins, an example of which is shown in Figure 3-6 below.

Figure 3-6 Example 140-Litre Wheeled Bin

3.7.17 Based on the estimated weekly waste generation detailed in Table 3-6, Table 3-7 below summarises the waste storage requirements for the Proposed Development for properties with communal waste storage.

Table 3-7 Communal Waste Storage Requirements

Core	Tenure	Number of Containers			Total
		1,100-Litre Eurobins		140-Litre Wheeled Bins	
		Residual Waste	DMR	Food Waste	
C	Private & Social Rent	6	6	4	16
D	Social Rent	5	5	4	14
E		5	5	4	14
F		7	7	5	19
Total		23	23	17	63

3.7.18 Table 3-8 below details the dimensions of the containers summarised in Table 3-6.

Table 3-8 Container Dimensions – Communal Waste Storage

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

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

3.7.20 The locations of the ground-floor level residential waste stores are shown in green in Figure 3-7.

Figure 3-7 Residential Waste Stores - Phase 3

3.7.21 The configurations of the residential waste stores are shown in Figure 3-8 and Figure 3-9 below.

Figure 3-8 Residential Waste Store Configurations - Blocks C and D

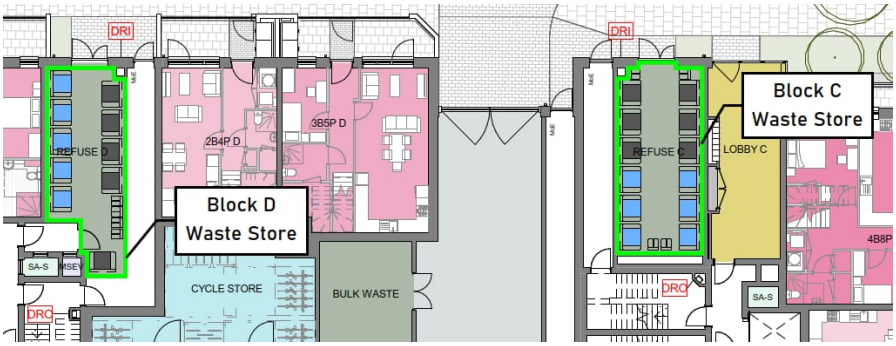


Figure 3-9 Residential Waste Store Configurations - Blocks E and F

3.7.22 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:

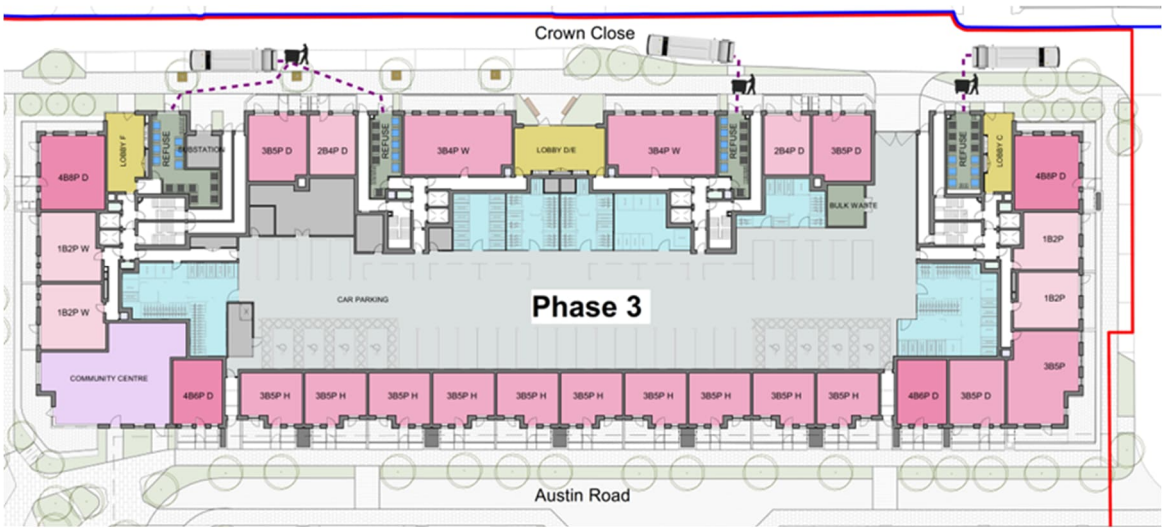
- A suitable water point in close proximity to allow washing down;
- All surfaces will be sealed with a suitable wash proof finish (vinyl, tiles etc.);
- All surfaces will be easy to clean;
- Suitable floor drain; and

- Suitable lighting and ventilation.

WASTE COLLECTION

3.7.23 On the nominated collection day, the LBH RCV will stop in a safe and legal loading position adjacent to each of the residential waste stores, as indicatively shown in Figure 3-10 below.

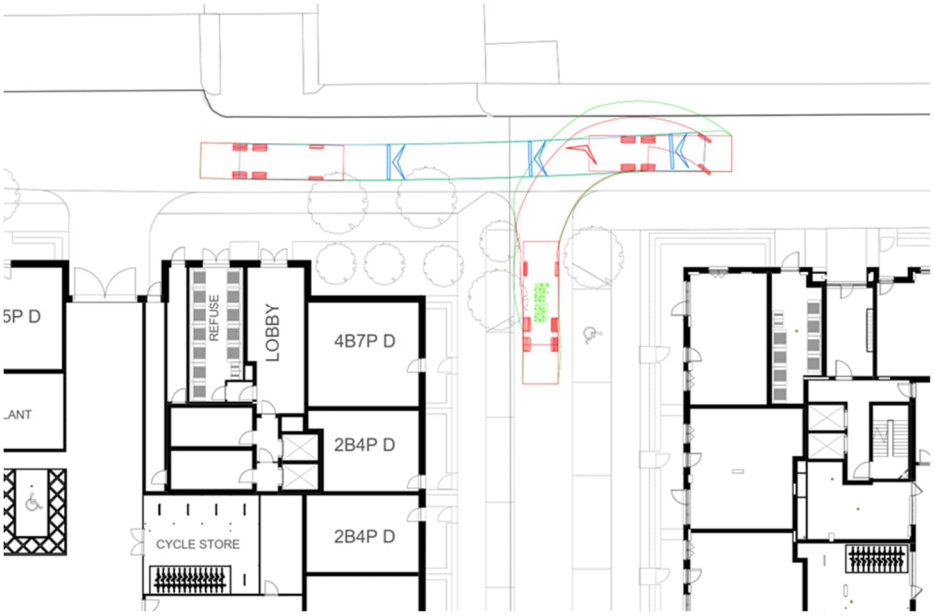
Figure 3-10 RCV Indicative Collection Access



3.7.24 As agreed during pre-application discussions, to prevent blocking the car park access during collections, the RCV will perform an extended reverse manoeuvre to access the Block C residential waste store.

3.7.25 Figure 3-11 below shows an extract of the proposed manoeuvre from the swept path analysis included in APPENDIX B.

Figure 3-11 RCV Extended Reverse



3.7.26 The LBH waste collection operatives will access the bins from each residential waste store directly, and wheel them to the waiting RCV.

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

3.7.28 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.

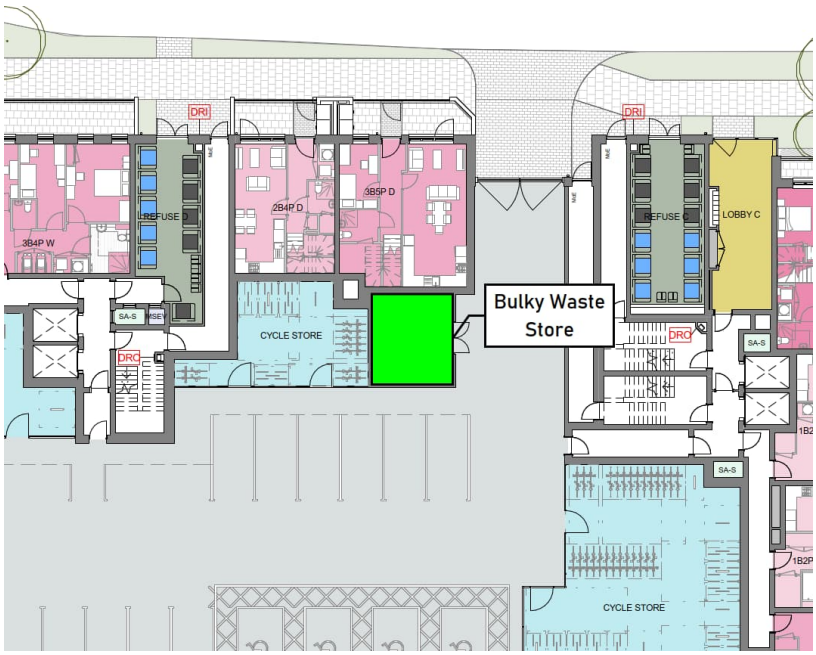
3.7.29 Clear space on the kerbside will be provided for the RCV and dropped kerbs in locations for transition of bins to the carriageway during collections.

3.8 BULKY WASTE

3.8.1 Residents in each building will be provided with access to bulky waste storage facilities for large redundant items such as furniture or appliances.

3.8.2 The shared bulky waste will be located in Block D of the Proposed Development, as shown in Figure 3-12 below.

Figure 3-12 Bulky Waste Storage - Block D



3.8.3 The estate management team will be responsible for managing bulky waste at the Proposed Development, to ensure the residential waste stores are not blocked on collection days.

3.8.4 Residents will contact LBH to pay for collection and place items in the bulky waste storage facilities.

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

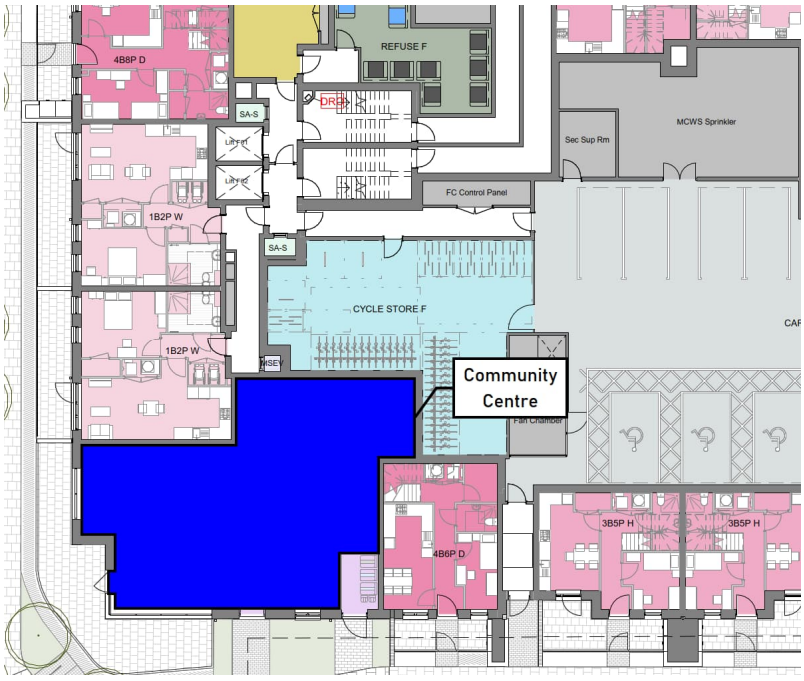
4 MANAGEMENT OF COMMUNITY CENTRE WASTE

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 non-residential elements of the Proposed Development, which comprises a ground level community centre in Block F.

4.1.2 Figure 4-1 below shows, in blue, the location of the of the community centre within the Proposed Development.

Figure 4-1 Block F Ground Level Community Centre



4.2 WASTE GENERATION MODELLING

4.2.1 LBH does not provide metrics for estimating non-residential waste generation. Waste generation metrics for the proposed community centre have been sourced from British Standard BS5906:2005, *Waste Management in Buildings – Code of Practice*.

4.2.2 The selected metrics are summarised in Table 4-1 below.

Table 4-1 Waste Generation Metric

Use	Metric Description	Weekly Waste Metric	Waste Composition
Community Centre	Entertainment Complex / Leisure Centre	5 litres of waste per m^2 of floor area	• 25% Residual Waste • 70% DMR • 5% Food Waste

4.2.3 Table 4-2 below summarises the non-residential area schedule for the Proposed Development.

Table 4-2 Commercial Area Schedule

Description	GIA (m^2)
Community Centre	169

4.2.4 Applying the waste metrics detailed in Table 4-1 to the area schedule detailed in Table 4-1, Table 4-3 summarises the estimated weekly non-residential waste arisings for the Proposed Development once operational.

Table 4-3 Estimated Weekly Non-Residential Waste Generation

Estimated Weekly Waste Generation (Litres)			
Residual Waste	DMR	Food Waste	Total
211	592	42	845

4.3 PROPOSED WASTE MANAGEMENT STRATEGY

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

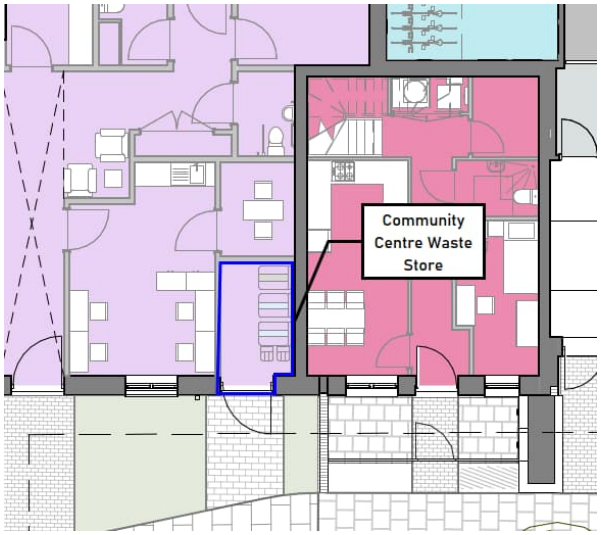
COMMUNITY CENTRE WASTE STORAGE

4.3.2 The tenants will provide temporary internal waste storage within their demise for segregation of waste at source.

4.3.3 As necessary, the tenants will transfer the segregated waste from their temporary internal waste storage to a dedicated community centre waste store in Block F.

4.3.4 The Block F community centre waste store is shown in Figure 4-2 below.

Figure 4-2 Block F Community Centre Waste Store Configuration



4.3.5 Based on the estimated waste volumes outlined in Table 4-3, Table 4-4 summarises the number of bins required to provide sufficient waste storage capacity, assuming twice weekly collections.

Table 4-4 Block F Community Centre Waste Storage Provision (Twice Weekly Collections)

Number of Bins		
240-Litre Wheeled Bins		23-Litre Caddy
Residual Waste	DMR	Food Waste
1	2	2

4.3.6 The community centre waste store will be sufficiently sized to accommodate the number and types of bins detailed in Table 4-4 above.

4.3.7 The community centre waste store will be designed in accordance with British Standard BS5906:2005 *Waste Management in Buildings - Code of Practice*. The facilities should include the following:

- A suitable waste 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.

4.3.8 To allow for operational contingency, the community centre waste store will have a minimum of two days' waste storage, to account for operational issues.

4.3.9 A suitably licensed commercial waste contractor will be appointed to collect the residual waste, DMR and food waste from Block F on an agreed schedule.

4.3.10 On collection days, the commercial waste contractor will stop the RCV in a safe and legal loading position adjacent to the community centre waste store on Austin Road.

4.3.11 The collection operatives will access the bins within the community centre waste store directly and transfer them to the waiting RCV.

4.3.12 Once the bins have been emptied, the collection operatives will return the bins to the Block F community centre waste store.

4.3.13 No bins will be presented on the public highway.

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 store their bagged waste in a suitable container positioned within the curtilage of their property and present them on the boundary for collection.

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 estate management team.

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

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

COMMUNITY CENTRE WASTE

5.1.12 Estimated non-residential waste generation has been calculated using appropriate metrics extracted from BS5906:2005.

5.1.13 Tenants will provide internal waste storage within their respective commercial areas to enable segregation of waste at source into residual waste, DMR, and food waste.

5.1.14 As necessary, the tenants will transfer segregated waste from their temporary internal waste storage areas to the dedicated community centre waste store in Block F.

5.1.15 The community centre waste store will be constructed to BS5906:2005 standards.

5.1.16 On the nominated collection days, the appointed commercial waste contractor will stop the RCV in a safe and legal loading position on Austin Road, adjacent to the Block F community centre waste store.

5.1.17 Waste collection operatives will access the community centre waste store directly from Austin Road, transfer the bins to the waiting RCV, then return them to the Block F community centre waste store.

5.1.18 At no time will bins be presented 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.

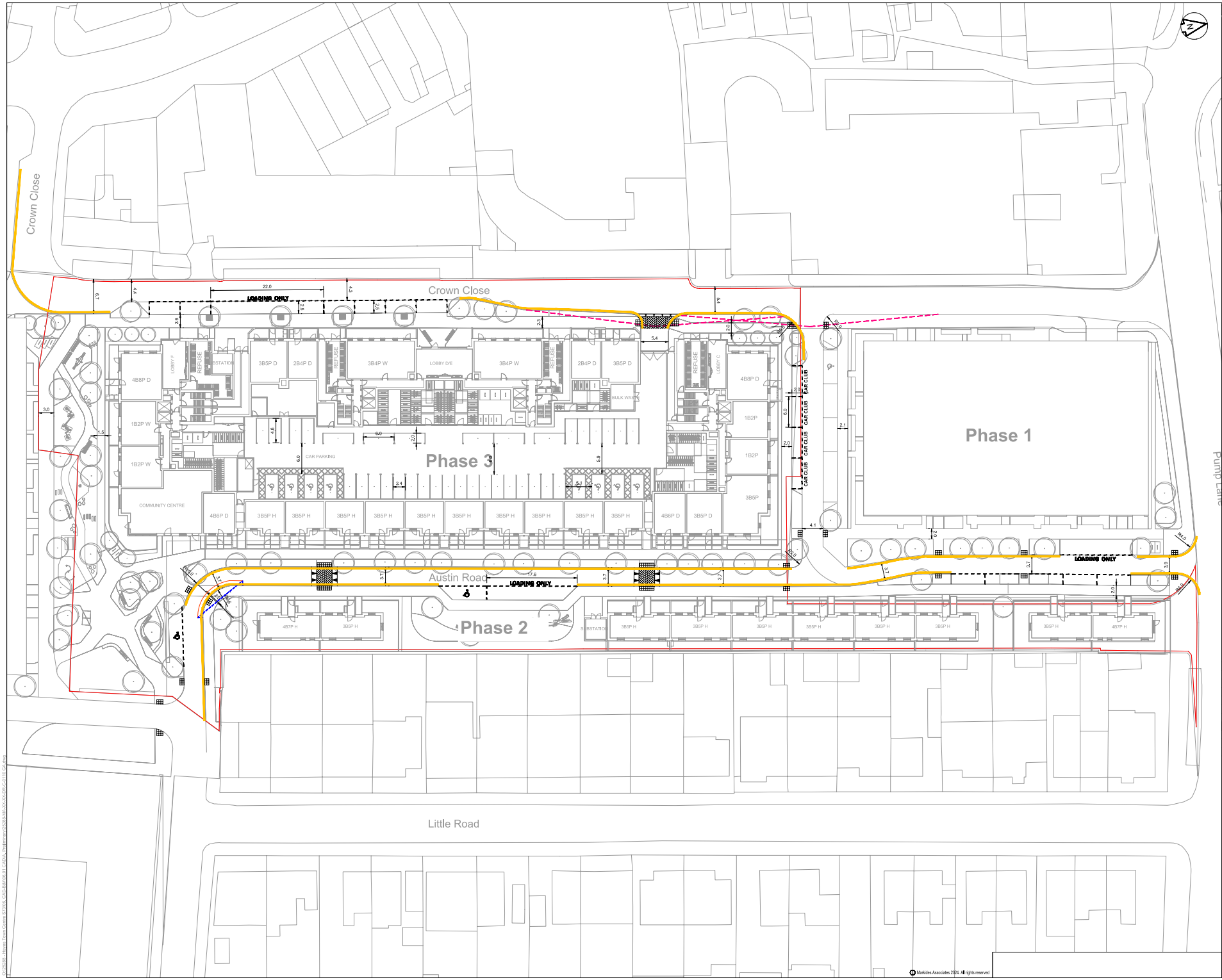
Policy MIN 4: *Re-use and Recycling of Aggregates* states that all developments are encouraged to:

- 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



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NOTES

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2. This drawing is based upon drawing number HTC-PRP-ZZ-00-GA-A-20600 - Site Plan Ground Floor - DRAFT supplied by PRP and Markides Associates shall not be liable for any inaccuracies or deficiencies.
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KEY

- 2.4M X 25M VISIBILITY SPLAY
- 1M X 11M FORWARD VISIBILITY SPLAY
- PROPOSED TACTILE

Revision History

P01	FOR INFORMATION	NB	AKS	AKS	28.01.26
Rev	Comment	By	Chkd	Appr	Date

Current Revision

P01	FOR INFORMATION	NB	AKS	AKS	28.01.26
Rev	Comment	By	Chkd	Appr	Date

S2 - FOR INFORMATION

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Project

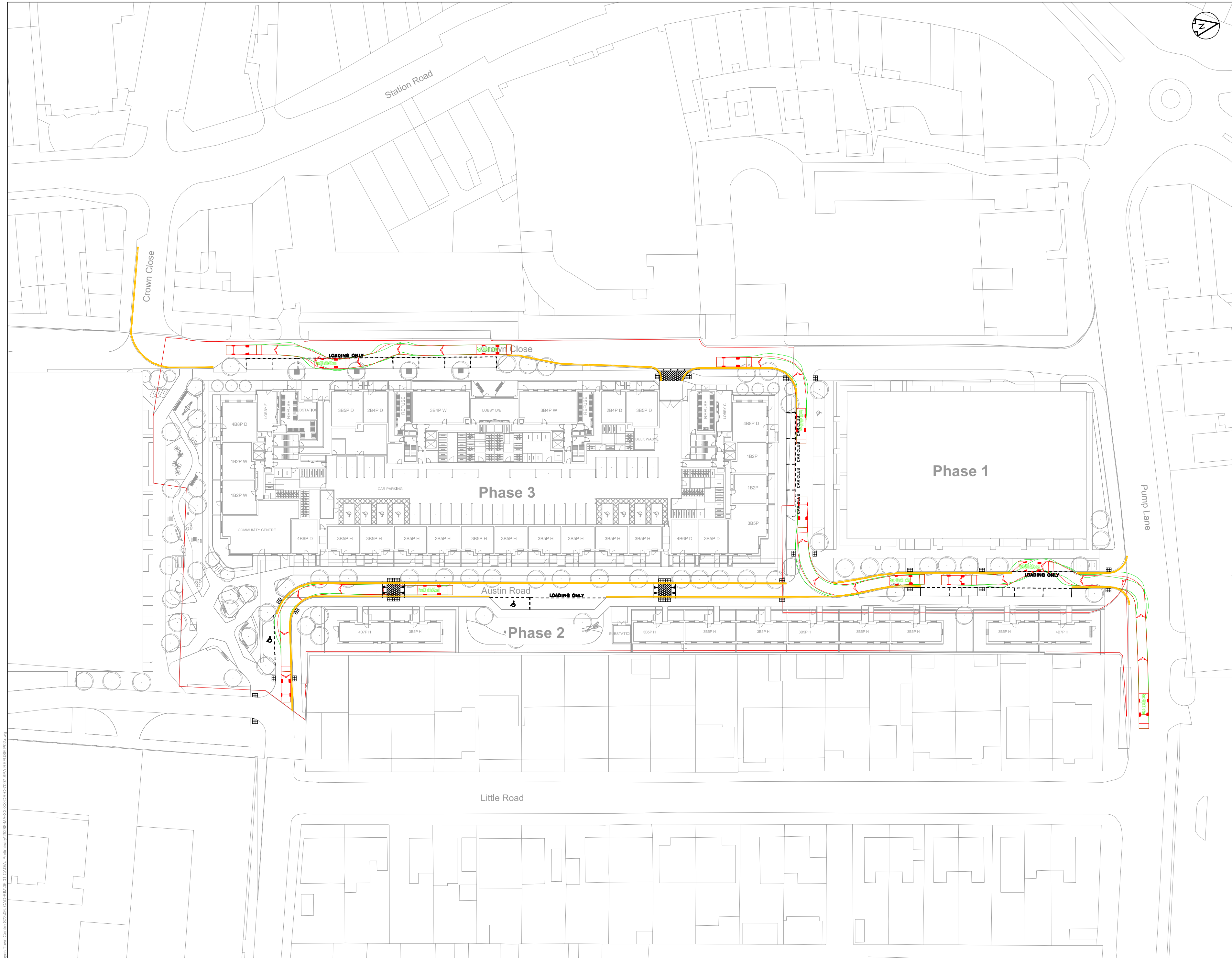
HAYES TOWN CENTRE S73

Drawing Title

GENERAL ARRANGEMENT

Markides Associates reference: 25288 NTS @ A1

25288-MA-XX-XX-DR-C-0110 - P01



Scale 1:400 @ A1 - 1:800 @ A3

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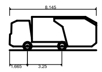

Phoenix 2-09N (with Elite 2 4x2 chassis)

Overall Length	8.145m
Overall Width	2.230m
Overall Body Height	3.153m
Min Body Ground Clearance	0.358m
Track Width	2.200m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	6.800m

KEY

- VEHICLE BODY LINE
- VEHICLE WHEEL LINE
- REVERSE GEAR

Revision History

P02	FOR INFORMATION	HCT	AKS	AKS	26.01.26
P01	FOR INFORMATION	JPB	AKS	AKS	25.09.25
Rev	Comment	By	Chkd	Appr	Date

Current Revision

P02	FOR INFORMATION	HCT	AKS	AKS	26.01.26
Rev	Comment	By	Chkd	Appr	Date

S2 - FOR INFORMATION

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Project
HAYES TOWN CENTRE S73

Drawing Title
REFUSE VEHICLE
SWEPT PATH ANALYSIS

Markides Associates reference: 25288 1:400 @ A1

25288-MA-XX-XX-DR-C-7007 - P02

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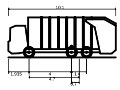

Refuse Vehicle	
Overall Length	10.100m
Overall Width	2.500m
Overall Body Height	3.800m
Min Body Ground Clearance	0.366m
Track Width	2.450m
Lock to lock time	4.00s
Wall to Wall Turning Radius	8.050m

KEY

- VEHICLE BODY LINE
- VEHICLE WHEEL LINE
- REVERSE GEAR

Revision History

P01	FOR INFORMATION	JPB	AKS	AKS	28.10.25
Rev	Comment	By	Chkd	Appr	Date

Current Revision

P01	FOR INFORMATION	JPB	AKS	AKS	28.10.25
Rev	Comment	By	Chkd	Appr	Date

S2 - FOR INFORMATION

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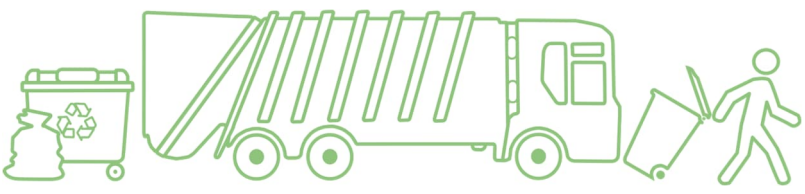
Project
HAYES TOWN CENTRE S73

Drawing Title
RCV MOVMENT CROWN CLOSE

Markides Associates reference: 25288 1:250 @ A1

25288-MA-XX-XX-DR-C-7019 - P01



VELOCITY