

DNA Uxbridge Ltd

High Street, Uxbridge

Operational Waste Management Plan

November 2024

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1 INTRODUCTION

- 1.1 This Operational Waste Management Plan ('OWMP') has been prepared by Caneparo Associates for DNA Uxbridge Ltd ('the Applicant') in relation to the proposed development of the site known as High Street, Uxbridge ('the site'), located in the London Borough of Hillingdon ('LBH').
- 1.2 The site comprises a prominent site in the centre of Uxbridge which fronts High Street, Belmont Road and Bakers Road. The existing site is a mixed-use development with retail units at the ground floor level and offices on the upper floors.
- 1.3 The Proposed Development is for the redevelopment of the site to deliver a mixed-use scheme comprising 1,115sqm GIA of Class E retail floorspace fronting High Street and Belmont Road, a 162-bed hotel and 320 co-living rooms with associated amenities and facilities. The proposals also incorporate a public courtyard to allow for significant improvements to the existing Cocks Yard walking route, along with associated cycle parking and accessible car parking.
- 1.4 The description of development for the application is as follows:
- "Demolition of the existing buildings and comprehensive redevelopment of the site to provide a mixed use development comprising hotel (Class C2), co-Living (Class Sui Generis) and replacement commercial floorspace (Class E) alongside open space, landscaping and public realm improvements, basement parking and refuse storage"*
- 1.5 This OWMP provides detailed information regarding the storage and disposal of waste to align with prevailing planning policy and guidance, providing a long-term strategy to appropriately manage and store waste once the Site is operational, providing appropriate storage provision for the anticipated waste arisings whilst managing waste in accordance with the waste hierarchy to prevent waste reaching landfill.
- 1.6 The OWMP has been prepared with reference to Policy SI 7 of the London Plan (2021) which focuses on reducing waste and supporting the circular economy, alongside the environment strategy for London (2018).
- 1.7 Discussions were undertaken with LBH's Waste Services Team to ensure that the refuse storage provision aligned with the Draft LBH Waste Management guidance that is currently being developed by LBH.

1.8 The following principles have been adopted in the creation of this OWMP:

- Waste for the hotel and co-living uses will be stored within dedicated waste stores, with these being secure and provided at ground floor level. Waste storage allowances align with LBH requirements and the Greater London Authority (GLA) Circular Economy Statement Guidance.
- The hotel and co-living elements of the development will be managed by their respective Facilities Management Teams who will provide oversight, management and control of the respective waste strategies.
- Occupiers of the Flexible Class E floorspace will manage their own waste, with waste stores to be provided within their own demise. All Flexible Class E floorspace is directly accessible from the street for waste collection, whilst waste storage allowances will align with LBH requirements and the Greater London Authority (GLA) Circular Economy Statement Guidance.
- Waste will be kept within the bin store then collected by private waste collection operators who will stop on-street in the designated vehicle loading bays which enable waste to be readily collected.
- All tenants of the building will be made aware of the waste and recycling regime, including where waste is stored, when collections occur (expected daily) and how it is segregated between general waste, recyclables and food prior to the first occupation of the development.

1.9 The remainder of this OWMP is set out as follows:

- Section 2 - summarises the existing and proposed site;
- Section 3 - summarises the relevant policy guidance on waste management;
- Section 4 - details the waste storage and collection strategies;
- Section 5 - provides details on the site management;
- Section 6 - covers the measures and initiatives of the OWMP;
- Section 7 - details the monitoring and review of the OWMP; and,
- Section 8 - provides a conclusion.

-
- The map displays the town of Uxbridge with various streets and landmarks. A red rectangle indicates the 'SITE' location, situated near the intersection of High Street and Belmont Road. A blue circle with a red cross symbol marks the 'Underground Station' location, located on High Street near the Uxbridge Library. Red circles with a red cross symbol indicate 'Key Bus Stops' at several locations along High Street and other roads. The map also shows the A4020 road, the A4007 road, and the A4008 road. Other landmarks include Christ Church, The Chimes, and the Uxbridge Library. A north arrow is located in the top right corner.
- KEY:**
- Site Location
 - Underground Station
 - Key Bus Stops

Source: ArcGIS Pro 2023

- 3

Proposed Development

2.4 The Proposed Development is for the redevelopment of the site to deliver a mixed-use scheme comprising retail, co-living, and hotel elements. The proposed development comprises the following key elements:

- 1,115sqm GIA of Flexible Class E retail floorspace;
- 320 co-living rooms;
- 162-bed hotel;
- Associated amenities for the co-living rooms, including a gym, a screening room, a laundry/games room and a two-storey co-working office space;
- New public courtyard at the centre of the site, new pedestrian access route through the site and improvements to the existing Cocks Yard walking route to the south of the site;
- Cycle parking in accordance with the London Plan (2021) standards;
- Provision of 9 accessible car parking spaces in a basement car park; and
- Waste storage in accordance with LBH standards.

3 POLICY AND GUIDANCE

- 3.1 This section summarises the relevant policy guidance in relation to the management of waste for new developments.

The Waste (England and Wales) Regulations 2011

- 3.2 The Waste (England and Wales) Regulations 2011 (amended in 2012) details the requirements for businesses to adhere to the waste management hierarchy which sets out waste management options to be considered by businesses, with the final approach being the disposal of waste.

- 3.3 The hierarchy in question is described within the Waste (England and Wales) Regulations 2011:

“An establishment or undertaking which imports, produces, collects, transports, recovers or disposes of waste, or which as a dealer or broker has control of waste must, on the transfer of waste, take all such measures available to it as are reasonable in the circumstances to apply the following waste hierarchy as a priority order—

(a) prevention;

(b) preparing for re-use;

(c) recycling;

(d) other recovery (for example energy recovery);

(e) disposal”

- 3.4 The regulations also state the importance of the provision of a Waste Management Plan and that local authorities should ensure that the plan includes suitable measures to limit waste production and ensure that waste created is managed suitably

London Plan (2021)

- 3.1 The London Plan (2021) is a Spatial Development Strategy which sets out the framework for the development of London over the next 20-25 years.

3.2 The justification and explanatory text for Policy D3 'Optimising site capacity through the design-led approach' states that *"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"*.

3.3 Policy SI 7 'Reducing waste and supporting the circular economy' states:

"A) Resource conservation, waste reduction, increases 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:

1) 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.

2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products.

3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026.

4) meet or exceed the municipal waste recycling target of 65 per cent by 2030.

5) meet or exceed the targets for each of the following waste and material streams:

a) construction and demolition – 95 per cent reuse/recycling/recovery.

b) excavation – 95 per cent beneficial use.

6) 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.

B) Referable applications should promote circular economy outcomes and aim to be net zero-waste.

A Circular Economy Statement should be submitted, to demonstrate:

1) how all materials arising from demolition and remediation works will be re-used and/or recycled.

2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.

3) opportunities for managing as much waste as possible on site.

4) adequate and easily accessible storage space and collection systems to support recycling and re-use.

5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.

6) how performance will be monitored and reported.

London Plan Guidance Circular Economy Statements (2022)

3.4 This document is a guide to preparing a Circular Economy Statement and has relevant information to this report.

3.5 At paragraph 4.8 'Operational waste management plan' it states:

"An operational waste management plan should be submitted... to demonstrate that the proposed development will: achieve the relevant targets (depending on operational activity) set out in London Plan Policy SI 7; and include shared, adequate, flexible, and easily accessible storage space and collection systems, as required by London Plan policies D3, SI 7 and D6. Applicants should also note that both the 65 per cent municipal waste and recycling target by 2030 and 75 per cent minimum target for business waste recycling by 2030 may apply depending on the nature of the operations of the building."

London Environment Strategy (2018)

3.6 This document has been produced by the Mayor with the aspiration to help turn London into a zero carbon city by 2050.

3.7 Policy 7.2.2 states that a 75 per cent recycling of business waste should be achieved by 2030, this will be achieved as follows:

- *"Minimum level of service – similar to households.*
- *Waste consolidation – reducing the number of service providers in specific areas.*
- *Increase collaboration with waste collectors on tools and support for businesses to recycle more.*
- *Data sharing and reporting to better understand London's business waste performance."*

Hillingdon Local Plan Part 1 – Strategic Policies (November 2012)

3.8 The Hillingdon Local Plan Part 1 – Strategic Policies was adopted in November 2012. This document contains the planning vision of LBH with regards to development, with policy included

that guides developers on how to deliver high quality development in the Borough. The following relevant policies are listed below:

- 3.9 Policy EM11: Sustainable Waste Management states:

"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."

Hillingdon Local Plan Part 2 – Development Management Policies (January 2020)

- 3.10 The Hillingdon Local Plan Part 2 – Development Management Policies document was adopted in January 2020. This document is the key strategic planning document for LBH which sets out the Council's long-term vision and objectives for the Borough for aspects such as the economy, new homes, and transport.

- 3.11 Policy DMT 1: Managing Transport Impacts states the following:

"Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

adequately address delivery, servicing and drop-off requirements; and

have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network."

- 3.12 Policy DMHB 11: Design of New Development Point D states:

D) "Development proposals should make sufficient provision for well designed internal 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."

British Standards BS5906:2005 (2005)

- 3.13 The British Standard 5906:2005 was published in December 2005 and sets out the National code of practice for methods of storage, collection, and segregation of recycling and general waste.

3.14 It is stated at Section 7.3.1 that:

"Containers of all types should preferably be stored under cover in specially designed waste storage chambers, or stores, which should be built to the same general standard as those for domestic premises. Adequate passive ventilation is particularly important in areas where quantities of biodegradable waste accumulate; mechanical ventilation may be necessary to prevent a build up of odours."

3.15 Section 8 – Waste Storage Chambers, sets out guidance for waste store design. Paragraph 8.1 – Location, states the following:

"Waste storage chambers should be located at vehicle access level (essential in the case of bulk containers). Basement-level waste storage should have adequate provision to move waste to the ground floor for collection, e.g. by use of a dedicated lift and a temporary designated collection point. Waste storage chambers should preferably be away from the main entrance to the building, and should be constructed such that containers can be removed directly to the outside, without passing through any part of the building served by the chamber except by way of passage."

4 OPERATIONAL WASTE STORAGE & COLLECTION

- 4.1 This section will set out the waste storage and collection strategies for the development. Waste will be managed in accordance with the waste hierarchy as set out in **Figure 4.1**.
- 4.2 Suppliers will be encouraged to take away their packaging to minimise the accumulation of waste on-site. It may be possible to remove packaging prior to its arrival to the Site to improve waste management subject to the FMT's delivery strategy.
- 4.3 In accordance with the London Environment Strategy, the Applicant commits to a business waste recycling target of 75% (by weight / tonnage) by 2030 and a residential waste recycling target of 65%. The FMT will keep a record of how much waste and recycling is produced and will reallocate bins for recycling as/when necessary

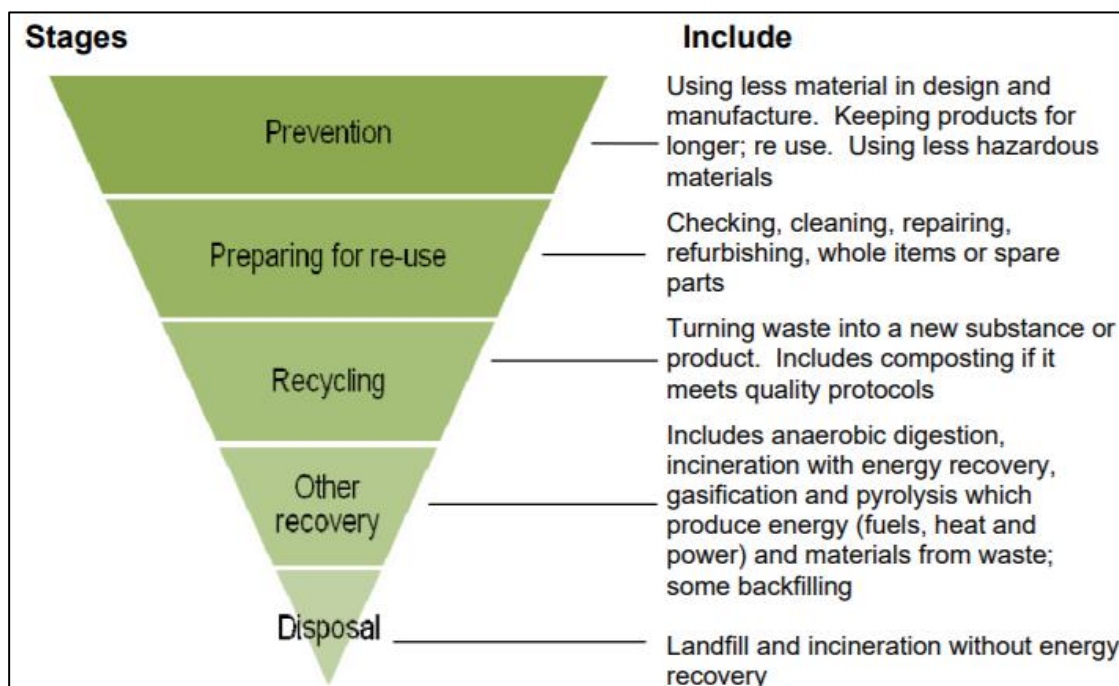


Figure 4.1 Waste Hierarchy (source: www.defra.gov.uk)

Waste Storage Calculations and Provision

- 4.4 The proposed waste strategy has been based on the draft LBH Waste Management guidance which has been provided by the LBH Waste Services team.

Co-Living Waste

- 4.5 In accordance with the draft LBH Waste Management guidance document, 60L of recycling waste and 60L of general waste storage is required per co-living unit. As such, a total of 19,200L of recycling waste and 19,200L of general waste storage is required at the site to serve 320 co-living rooms.
- 4.6 In addition, initial discussions with LBH suggested the provision of at least 1 x 140L wheelie bin for food waste within each waste store; however, to ensure that there is ample capacity, a total of 5 x 140L wheelie bins for food waste have been provided across the two co-living waste stores.
- 4.7 The waste storage will be provided across the two stores as follows:
- Co-Living Refuse Store A: 8 x 1,280L Eurobins for mixed recycling, 8 x 1,280L Eurobins for general waste and 2 x 140L wheelie bins for food waste.
 - Co-Living Refuse Store B: 7 x 1,280L Eurobins for mixed recycling, 7 x 1,280L Eurobins for general waste and 3 x 140L wheelie bins for food waste.
- 4.8 Waste will be collected once per week by LBH Council waste operatives.
- 4.9 It is noted that co-living refuse store A will require bin rotations to ensure that all bins are filled up ahead of collection, whilst co-living refuse store B may benefit from bin rotation however it is not required. The SMT and co-living manager(s) will ensure that bin rotation takes place, with adequate space provided in both refuse stores to allow this to be undertaken.
- 4.10 Residents will deposit waste into the stores themselves whilst the Facilities Management Team will aid in moving bins and presenting them for collection.

Hotel Waste

- 4.11 In accordance with the draft LBH Waste Management guidance document, waste storage will be provided at a quantum of 3.5 cubic metres (3,500L) of waste storage per 1,000sqm NIA of floorspace. The guidance prescribes that 70% of the waste storage provided should be recycled, with the remaining 30% being general waste.
- 4.12 As such, the 4,462sqm NIA of hotel floorspace will require the provision of 15,617 litres of waste per week of waste each week, which will be split at a 70:30 ratio between general waste and recycling. As such, there is expected to be a weekly waste generation of 10,931.9 litres of recycling waste and 4,685.1 litres of general waste.
- 4.13 The hotel waste will be collected on a daily basis (assumed 5 collections per week) to improve operational efficiencies, and reduce the potential for vermin. Waste collection will be undertaken by a private waste contractor. On this basis, 3123.4 litres of waste will be required to be stored in total, of which 937 litres of general waste and 2,186.4 litres of mixed recycling storage is required.
- 4.14 To accommodate the demands of the hotel waste generation, a single bin store will be provided with space for 4 x 1,100 litre bins (1 x bin for general waste and 3 x bins for mixed recycling).
- 4.15 It is noted that once an operator / tenant is confirmed, site management will review means of introducing food storage or similar at the site. As part of the fit-out, the tenant(s) will be required to target 75% by weight being diverted from landfill.

Flexible Class E Waste

- 4.16 Owing to the specific Occupiers / land uses for the Flexible Class E floorspace not being known yet, it is not currently possible to provide an accurate calculation for the waste storage provision at the site.
- 4.17 A calculation has been undertaken nonetheless for the purposes of tonnage calculations using the draft LBH Waste Management guidance document which prescribes 4 cubic metres (4,000L) of waste storage is required per 1,000sqm NIA per week. The guidance prescribes that 70% of the waste storage provided should be recycled, with the remaining 30% being general waste.

- 4.18 The proposed retail uses will have a total floorspace of 681sqm NIA. As such, the proposed retail uses will be expected to generate 2,724 litres per week of waste each week, which will be split at a 70:30 ratio between general waste and recycling. As such, there is expected to be a weekly waste generation of 1906.8 litres of recycling waste and 817.2 litres of general waste.
- 4.19 All Occupiers of the Flexible Class E floorspace will be required to provide waste storage within their own demise to accommodate their specific business requirements, commensurate to the size and scale of the individual units.
- 4.20 It is noted that once a tenant(s) is confirmed, site management will review means of introducing food storage or similar at the site, along with additional waste storage for other streams if appropriate. As part of the fit-out, the tenant(s) will be required to target 75% by weight being diverted from landfill.
- 4.21 In addition, it is noted that the LBH guidance requires that restaurants under 500sqm must provide a minimum waste storage of 1,500L, with 70% of this being for recycling. It will be ensured that the tenant(s) agree to this and take it into account during the fit-out stage.

Unique Waste

- 4.22 There is likely to be a small component of the overall waste arisings from the proposed development that will comprise other waste streams, such as Waste Electrical and Electronic Equipment (WEEE), gas canisters, Hazardous Waste (HAZ), printer and toner cartridges and fluorescent light tubes. Building maintenance will also give rise to materials such as paints and waste lubricating oils that will require separate storage in dedicated sealed containers.
- 4.23 This type of waste is termed “unique” as it will not be produced on a regular basis and therefore its management will be on special arrangement with a registered waste handler for the specific waste that is produced.
- 4.24 All waste management will have to comply with Environmental Protection Act 1990 and The Waste (England and Wales) (Amendment) Regulations 2014. Space for additional unique waste containers provided (e.g. battery bins).

Annual Waste Generation

4.25 As set out above, the proposed development is predicted to generate 39,100 litres of co-living (residential) waste; 15,617 litres of hotel waste and 2,724 litres of Class E retail waste per week. Across a typical year, the following volume of waste is expected to be generated (weekly waste arisings x 52)

- Co-living: 2,033,200 litres per annum.
- Hotel: 812,084 litres per annum.
- Class E: 141,648 litres per annum.

4.26 The following waste estimates have been used to calculate the tonnage generated by the proposed development per annum, (source: sustainabilityexchange.ac.uk)

- General waste = 0.27 tonnes per 1 cubic metre
- Recyclables = 0.6 tonnes per 1 cubic metre
- Glass & Food = 0.75 tonnes per cubic metre

4.27 Based on the above, the proposed development is expected to generate 1,373.7 tonnes of waste per year (1,000 litres = 1 cubic metre). **Table 4.1** demonstrates the tonnes per annum in line with the “Recycling and Waste Reporting” table from the Circular Economy Statement guidance.

Table 4.1: Recycling and Waste Tonnage per Annum					
	Overall Waste Generated (tonnes)	Target Recycling Rate	% Reused on or off-site	% Recycled or composted on or off-site	% Not Reused or Recycled
Co-Living (Municipal)	895.9	65%	0% 0 tonnes	69.9% 626.3 tonnes	30.1% 269.6 tonnes
Hotel	406.9	75%	0% 0 tonnes	83.8% 341.1 tonnes	16.2% 65.8 tonnes
Class E Retail	71.0	75%	0% 0 tonnes	83.8% 59.5 tonnes	16.2% 11.5 tonnes

Waste Collection

- 4.28 The co-living use will have two refuse stores at ground level, with the hotel use having its own dedicated waste store also at ground level. Waste will be stored in ventilated areas with drainage, which is constructed of a robust material that can be easily maintained, cleaned, and washed down. The Applicant is willing to commit to the following:
1. *Waste storage chamber/s will be built to BS5906 specifications.*
 2. *All occupants of the development will have access to and be required to use the waste storage facilities.*
- 4.29 The retail units will be required to provide appropriate waste storage facilities in accordance with their specific requirements within the demise of their respective unit(s).
- 4.30 Waste collection vehicles for the co-living waste store fronting Bakers Road will stop within the loading bay on Bakers Road, whilst waste collection vehicles for the hotel waste store and the co-living waste store fronting Belmont Road will stop within the loading bay marked on Belmont Road.
- 4.31 In addition, it is proposed that the Facilities Management Team will transfer the co-living bins to the waste holding areas on-street ahead of collection to assist the waste operatives and reduce waste collection vehicle dwell times significantly. The Facilities Management Team will ensure that co-living bins are transferred back into the waste store as soon as possible after they have been emptied.
- 4.32 The Facilities Management Team(s) and the manager(s) of the co-living and hotel floorspace will deposit waste from their premises directly into the containers provided and ensure all waste has been consolidated prior to collection.
- 4.33 **Figure 4.1** below demonstrates the location of the co-living waste stores, the hotel waste store, the co-living waste holding areas and the waste transfer routes.



Figure 4.1: Waste Stores & Transfer Routes

Waste Collections

- 4.34 Waste collection vehicles for the co-living waste store fronting Bakers Road will stop within the loading bay on Bakers Road marked on **Figure 4.1**, whilst waste collection vehicles for the hotel waste store and the co-living waste store fronting Belmont Road will stop within the loading bay marked on Belmont Road.
- 4.35 In addition, it is proposed that the Facilities Management Team will transfer the co-living bins to the waste holding areas on-street ahead of collection to assist the waste operatives and reduce waste collection vehicle dwell times significantly. The Facilities Management Team will ensure that co-living bins are transferred back into the waste store as soon as possible after they have been emptied.
- 4.36 The Facilities Management Team(s) and the manager(s) of the co-living and hotel floorspace will deposit waste from their premises directly into the containers provided and ensure all waste has been consolidated prior to collection.

- 4.37 The Applicant will investigate the ability to utilise low and no-emission electric vehicles to collect waste where possible, reducing the carbon impact of waste removal. The ability to consolidate collections with other local commercial development to reduce vehicle movements locally will also be investigated as part of the private collection contract.

5 SITE MANAGEMENT

- 5.1 It is expected that separate Facilities Management Teams will be responsible for each use within the development (i.e. co-living, hotel and individual retail units). The Facilities Management Teams' role in managing and maintaining the waste areas is one of the most important aspects of the OWMP as they will be responsible for the implementation of the OWMP and the measures and initiatives set out within the document. They will also be the point of contact for all concerned stakeholders.
- 5.2 The Facilities Management Team details will be provided in the future, upon the occupation of the development.
- 5.3 The Facilities Management Teams will be responsible for all aspects of the OWMP which relate to their use of the site and their primary functions will include:
- Overseeing the management, development, implementation, monitoring, and review of the OWMP;
 - Liaison with the Developer and the Council;
 - Liaison with the commercial space users (SMT);
 - Managing the development and implementation of the OWMP measures;
 - Promoting the objectives and benefits of the OWMP; and,
 - Liaising with waste collection contractors/providers.
- 5.4 The Facilities Management Teams will give a 'human face' to the OWMP, explaining its purpose and the opportunities / benefits it provides.

Management of Waste in Accordance with the Waste Hierarchy

- 5.5 In order to ensure the management of waste occurs in accordance with the waste hierarchy, Facilities Management will use site management measures and initiatives as set out in Section 6.

Ensuring Adequate, Flexible, and Easily Accessible Storage and Collection

- 5.6 The proposed waste storage solutions between each use have been prepared in accordance with the LBH draft waste management guidance, including the provision of sufficient waste storage by waste stream. The Facilities Management Teams should review the success of the Operational Waste Management Plan in accordance with the monitoring and reporting measures set out in Section 7 to monitor the success of the OWMP and, as necessary and appropriate, make changes to ensure the waste collection and management measures are fit-for-purpose whilst meeting the waste targets set out.

Supporting the Separation of Dry Recyclables

- 5.7 In accordance with the requirements of Operational Waste Management Plans, consideration has been given to how the proposed development supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals and glass), food waste and other waste.
- 5.8 The proposed strategy is based upon the use of a waste collection contractor that can collect Dry Mixed Recyclables that will be able to segregate waste at their associated waste facilities, including separation between card, paper, mixed plastics, metals and glass. It will be necessary for the Facilities Management Teams to consider whether it is appropriate and feasible to segregate these waste streams at source within the development.
- 5.9 It is recognised that further segregation of waste within the development will increase the number of waste collection vehicles that will be required to visit the site each day (with each vehicle collecting a different waste stream) which increases the number of HGVs using local roads within the town centre, and will have affects to cyclists and pedestrians on local roads with increased occurrences of bins being transferred across the footway and the waste collection vehicle. It may therefore be preferable to retain a strategy predicated upon Dry Mixed Recyclables at the development to avoid unwanted negative impacts.
- 5.10 With respect to food waste, the Facilities Management for the hotel and Class E uses will be required to investigate the potential of providing segregated facilities for this waste stream. Segregated food waste facilities have been allowed for in the design approach for the co-living use, in accordance with the LBH draft waste guidance.

6 MEASURES AND INITIATIVES

- 6.1 This section sets out the measures and initiatives that will be implemented to assist the storage and collection of waste within the site.
- 6.2 The Facilities Management Teams will oversee the storage and collection of waste and ensure the smooth operation of the plan.
- 6.3 All waste measures are compliant with BS 5906:2005, the Environmental Protection (Duty of Care) (England) (Amendment) Regulations, 2003 (Ref. 3), Part H6 of the Building Regulations (2013) (incorporating all amendments) (Part H6) (Ref. 4), the London Plan Policy SI 7, and the London Environment Strategy.

Consolidation, Smart Logistics and Low-Carbon Waste Collection

- 6.4 The Applicant will explore the consolidation of waste streams between each land use to reduce the number of waste collection vehicles that may visit the Site.
- 6.5 Following occupation, the Applicant will explore smart-logistics and community-led waste minimisation schemes to reduce the quantum of waste that leaves the site. This could include the creation of a working group between the different occupiers of the development (hotel, co-living and retail occupiers) to find collaborative working practices to reduce waste and improve management, which could include seeking to use the same waste collection company between each use to reduce the number of vehicles visiting the site.
- 6.6 The Applicant would also look to use companies that have low or no-emission vehicles to deliver their goods in the procurement of the proposed delivery consolidation strategy.
- 6.7 In addition, the Facilities Management Teams could encourage retail tenants (and hotel / co-living Occupiers if appropriate) to sign up to a food waste reduction application such as 'TooGoodToGo', which offers discounted leftover food to customers at the end of the day.
- 6.8 Cargo bike usage is ever increasing for last mile deliveries and therefore the Applicant will look to source supplies through this method where possible. Waste collection will always be looked to be consolidated particularly noting that the Applicant will operator the entire building and undertakes a similar arrangement on their other schemes.

Information Provision and Awareness

- 6.9 Occupiers of the proposed development will be made aware of the existence of the OWMP upon occupation of the site. The details of the OWMP, its objectives, and the role of individuals in achieving its objectives, will be set out upon the start of their occupancy.
- 6.10 Signage will be placed in waste storage areas discouraging the deposit of recyclables in waste containers and encouraging the use of recycling opportunities provided.
- 6.11 The following could be used as a means of further disseminating information and promoting initiatives:
- Notices posted in areas on each floor where waste is collected.
 - Newsletters.
 - Information within the Employee Induction Packs / Resident Moving in Packs.

Storage / Collection of Hazardous Waste

- 6.12 It is acknowledged that the storage and collection of hazardous waste is an integral element of any waste management, and necessary to comply with various waste management and health and safety legislation. Specific details on the storage and collection of hazardous waste is set out below.
- 6.13 A bin will be provided in a prominent communal area, most likely within the building reception at ground floor, for the depositing of used batteries.
- 6.14 To manage the waste associated with Mercury-containing equipment, all such equipment will be banned from being procured or used unless prior written consent is given by the Site Owner. The preventative measure will ensure that the potential for the disposal of any equipment containing mercury is prevented and thus specific waste storage facilities are not required.
- 6.15 Waste Electrical and Electronic Equipment recycling (WEEE) facilities will be provided whereby tenants will liaise with the FMT who will collect WEEE as necessary and liaise with appointed waste collection contractors for the appropriate collection and disposal as necessary.

- 6.16 The use of pesticides will be controlled whereby their use will only be permitted by the building owner, or their appointed Facilities Management Team, as necessary. This will enable their appropriate use and control by qualified gardening teams (for the management of all landscaping) or pest controllers.

Fly Waste and Fly-Tipping

- 6.17 The Facilities Management Team will monitor the Site for any fly-waste or litter and will collect and process any materials within the boundary of the property; this will include recycling this material where possible/appropriate.
- 6.18 In the unlikely event of fly-tipping, upon identifying this the Facilities Management Team will liaise with the waste contractor for the same-day removal, and flexibility will be available within the delivery booking system for the collection vehicle to access the servicing area. Any hazardous waste will be correctly labelled, contained and segregated within a store in any interim period arising prior to booked removal.

7 MONITORING AND REVIEW

Monitoring

- 7.1 A dedicated member of the Facilities Management Teams will constantly monitor/review the OWMP and, if considered necessary/appropriate, will propose changes to the OWMP, inclusive of any changes required to waste collections; all changes will be submitted for approval by the Local Planning Authority (LPA).
- 7.2 As part of the monitoring/review of the Plan, the Facilities Management Teams will take into consideration any other developments in the locality which could potentially affect, or be affected by waste activity associated with the proposed development.
- 7.3 Monitoring will occur by the Facilities Management Teams in collaboration with their appointed Waste Collection Contractors to seek to quantify the volume of waste that is generated by waste stream on a regular basis. This will provide a clear and empirical understanding of the volume / weight of waste being generated by stream and allow improvements to be made to the on-site handling and management of waste

Reporting

- 7.4 The Applicant will report the findings of the proposed monitoring with the Council as required.

Review

- 7.5 The Facilities Management Teams will review any comments received from occupants of the proposed development and/or third parties regarding waste storage and collection and notify the Council if necessary/ appropriate.