2 WATERHOUSE SQUARE OPERATIONAL WASTE MANAGEMENT STRATEGY

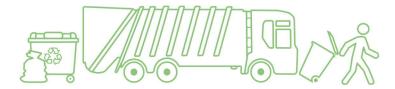
PROJECT NO. 22/192 DOC NO. D012

DATE: JULY 2023

VERSION: 1.0

CLIENT: PRUDENTIAL ASSURANCE COMPANY LIMITED

Velocity Transport Planning Ltd www.velocity-tp.com





DOCUMENT CONTROL SHEET

Document Reference

Project Title	2 Waterhouse Square	
Document Title	Operational Waste Management Strategy	
Project Number	22/192	
Document Number	D012	
Revision No.	1.0	
Document Date	JULY 2023	

Document Review

	Name	Date completed
Prepared By	Oliver James	20/07/2023
Reviewed By	Peter Hambling	20/07/2023
Authorised By	Chris Gent	20/07/2023

Notes

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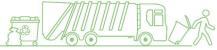


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1 INTRODUCTION

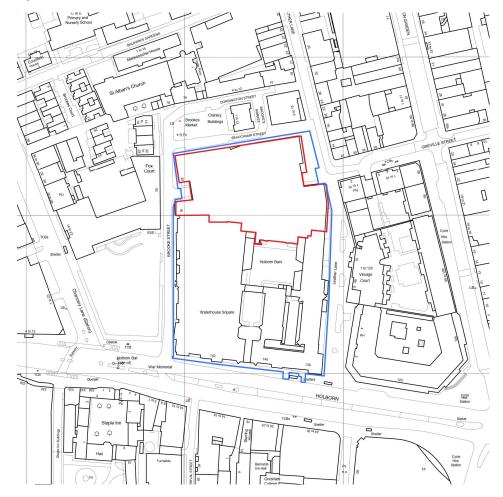
1.1 PROJECT BACKGROUND

- 1.1.1 This Operational Waste Management Strategy (OWMS) has been prepared by Velocity Transport Planning, on behalf of 'Prudential Assurance Company Limited' to support a full planning application at 2 Waterhouse Square (hereafter referred to as the 'Proposed Development') within the London Borough of Camden (LBC).
- 1.1.2 This OWMS considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage, and collection of waste arising.

1.2 SITE LOCATION

- 1.2.1 The site is located to the north of Holborn (A40) bound by Brooke Street to the west, Leather Lane to the east, Beauchamp Street to the north and High Holborn to the South.
- 1.2.2 The site location is shown in Figure 1-1 below.

Figure 1-1 Site Location



1.3 EXISTING SITE

1.3.1 The Site forms part of the Grade II listed 'Prudential Assurance Building, 142 Holborn Bars', as identified within the Historic England list description. The Site is also located within the Hatton Garden Conservation Area.

1.4 PROPOSED DEVELOPMENT

1.4.1 The Proposed Development is described as follows:

'Refurbishment and extension of the existing building at 2 Waterhouse Square comprising the delivery of Class E (commercial) floorspace and a flexible commercial (Class E) and bar (sui generis) unit, external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.'

1.5 DOCUMENT STRUCTURE

- 1.5.1 This 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 Commercial Waste provides an estimate of waste arising from the commercial uses and outlines the plan which will be adopted to manage the waste arising from the Proposed Development once operational.
 - Section 4: Summary & Conclusions
 - O Appendix A: National and Local Waste Policy & Guidance
 - Appendix B: Swept Path Analysis



2 WASTE LEGISLATION, POLICY & GUIDANCE

2.1 INTRODUCTION

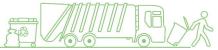
- 2.1.1 The UK is no longer a member of the European Union. EU legislation as it applied to the UK on 31 December 2020 is now incorporated into UK domestic legislation.
- 2.1.2 This section focuses on the details of the national legislation that are relevant to the Proposed Development, in addition to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

2.2 NATIONAL LEGISLATION

- 2.2.1 A list of relevant national waste legislation is outlined below in reverse chronological order:
- 2.2.2 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.
- 2.2.3 Waste Management, The Duty of Care Code of Practice (2020 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.
- 2.2.4 The Waste (England and Wales) Regulations 2011 Waste collection authorities must collect waste paper, metal, plastic, and glass separately. This legislation also imposes a duty on waste collection authorities, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
- 2.2.5 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 (2021);
 - Department for Communities & Local Government (DCLG), National Planning Policy for Waste (2014);
 - Department for Environment, Food and Rural Affairs (DEFRA), Our Waste, Our Resources: A Strategy for England (2018);
 - DEFRA, Waste Management Plan for England (2021);
 - HM Government, A Green Future: Our 25 Year Plan to Improve the Environment (2018);
 - Greater London Authority (GLA), The London Plan 2021 (March 2021);
 - GLA, London Environment Strategy (2018);



- NLWA, Residual Waste Reduction Plan (2020);
- O NLWA, North London Waste Plan: Proposed Submission Plan (January 2019);
- LBC, Waste Storage and Arrangement for Residential and Commercial Units (Supporting Document for Planning Guidance CGP1 Design Storage and Collection of Recycling and Waste) (2014).

3 MANAGEMENT OF COMMERCIAL WASTE

3.1 INTRODUCTION

- 3.1.1 This section outlines the waste management strategy that will be used to manage the operational waste arising from the Proposed Development.
- 3.1.2 The strategy has been developed in accordance with standards detailed in LBC's 'Waste Storage and Arrangement for Residential and Commercial Units' guidance document (hereafter referred to as 'the Guidance').

3.2 WASTE GENERATION MODELLING

- 3.2.1 LBC does not provide metrics for commercial waste generation. Waste generation metrics for the proposed office and retail areas have been sourced from London Borough of Islington's (LBI) *Recycling and Refuse Storage Requirements*.
- 3.2.2 The applied waste metrics are summarised in Table 3-1 below.

Table 3-1 Weekly Commercial Waste Metrics

Description	Waste Metric	Waste Composition	Assumptions
Office	2,600 Litres per 1,000m² (GIA)	⊙Residual Waste 25%	⊙ 5-day Operations
Retail	5,000 Litres per 1,000m ² (GIA)	(GIA) (DMR) 70% Food Waste 4% Volume per number of covers	⊙7-day Operations
Restaurant	Volume per number of covers [75 litres] x number of covers		⊙7-day Operations⊙1 Cover per 4m² (GIA)

- 3.2.3 To maintain a robust waste strategy, the retail and restaurant metric have been applied proportionally (50/50) to the proposed flexible retail area.
- 3.2.4 Table 3-2 summarises the commercial areas that form the Proposed Development.

Table 3-2 Area Schedule

Commercial Use	GIA (m²)
Office	29,542
Retail	311
Total	29,853

3.2.5 Applying the weekly waste metrics detailed in Table 3-1 to the area schedule summarised in Table 3-2, Table 3-3 below provides the estimated daily waste arisings for the Proposed Development once operational.

Table 3-3 Estimated Weekly Waste Generation

			Litres per Week		
Commercial Area	Residual Waste	DMR	Food Waste	Glass Waste	Total
Office	19,203	49,927	5,377	2,305	76,810
Retail	924	2,401	259	111	3,693
Total	20,127	52,328	5,636	2,416	80,503

3.3 PROPOSED WASTE MANAGEMENT STRATEGY

- 3.3.1 The proposed strategy to manage commercial waste has been devised to provide a high-quality service to commercial tenants whilst also being compliant with the Guidance.
- 3.3.2 The waste strategy for the Proposed Development is shared with the buildings that form the wider Waterhouse Square masterplan.
- 3.3.3 All facilities for the storage and presentation of commercial waste will be designed to standards detailed in BS5906:2005. In summary, the commercial waste store 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.

3.4 INTERNAL WASTE STORAGE

3.4.1 The commercial tenants will provide temporary internal waste storage within their commercial areas for segregation of waste at source.

OFFICE

- 3.4.2 It is anticipated an on-site Facilities Management (FM) contractor will be appointed to collect waste internally.
- 3.4.3 The on-site FM team will collect the waste in suitable trolleys as separate waste streams.
- 3.4.4 An example cleansing trolley is shown in Figure 3-1 below.



Figure 3-1 Example Cleansing Trolley¹



3.4.5 Using the service lifts and access corridors, the on-site FM team will transfer the segregated waste to the estate commercial waste store at lower ground level.

RETAIL

3.4.6 Tenants in the retail units will transfer their segregated waste to the shared commercial waste store using the service lifts and back-of-house areas where possible.

3.5 COMMERCIAL WASTE STORAGE

- 3.5.1 A shared estate commercial waste store will be provided at lower ground level within Building 3 of the masterplan area for all commercial occupants of the masterplan.
- This is the location that all residual waste, DMR, food waste and glass waste generated within the Proposed Development will be stored prior to collection.
- 3.5.3 Figure 3-2 below indicates the anticipated location of the lower ground level estate commercial waste store in Building 3.

¹ https://storagenstuff.co.uk/product/rubbermaid-triple-capacity-cleaning-cart

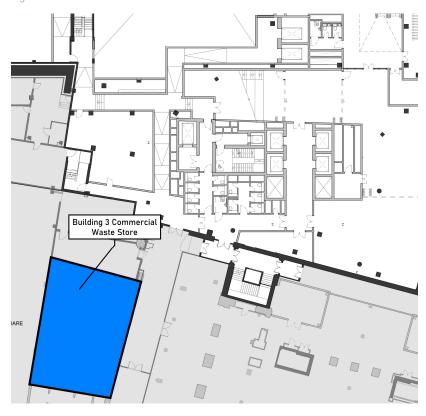


Figure 3-2 Lower Ground Estate Commercial Waste Store

- 3.5.4 The estate commercial waste store will be sized to accommodate all of the waste generated by the buildings within the masterplan.
- 3.5.5 The commercial tenants will in the Proposed Development will access the estate commercial waste store via back of house areas to deposit their segregated waste materials.
- 3.5.6 Residual waste and DMR will be stored in 1,100-litre Eurobins as shown in Figure 3-3 below.

Figure 3-3 Example 1,100-Litre Eurobin



3.5.7 Food waste and glass waste will be stored in 240-litre wheeled bins as shown in Figure 3-4 below.

Figure 3-4 Example 240-Litre Wheeled Bin



- 3.5.8 In order to reduce the volume of waste on site, it is anticipated residual waste and DMR will be compacted using an in-bin compactor located within the lower ground level estate commercial waste store.
- 3.5.9 The on-site FM team will compact the residual waste and DMR within the 1,100-litre Eurobins as they become full.
- 3.5.10 An example of an in-bin compactor is shown in Figure 3-5 below.

Figure 3-5 Example In-Bin Compactor²



3.5.11 The dimensions of a typical in-bin compactor are summarised in Table 3-4 below.

Table 3-4 Example Compactor Dimensions

Container	Dimensions (mm)		
Containei	Height	Width	Depth
Bergmann 1100E Wheelie Bin Compactor	2,580	1,450	1,727

- 3.5.12 Residual waste and DMR will be compacted at ratios of 3:1 and 2:1 respectively; food waste will not be compacted.
- 3.5.13 Table 3-5 below summarises the commercial waste storage requirements based on the aforementioned compaction ratios and assuming daily collections.

² https://www.bergmanndirect.co.uk/1100e-wheelie-bin-compactor

Table 3-5 Commercial Waste Storage Provision

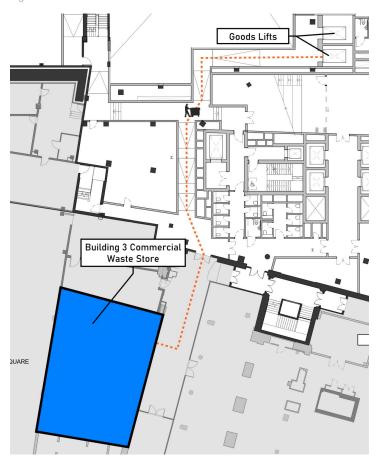
	Number of Containers			
Collection Frequency	1,100-Litre Eurobins		240-Litre Wheeled Bins	
	Residual Waste (Compacted at 3:1)	Recycling (Compacted at 2:1)	Food Waste	Glass Waste
Daily	3	5	7	3

- 3.5.14 As per the Guidance, as a minimum, two days' waste storage will be provided to allow for operational issues.
- 3.5.15 The commercial waste store will be large enough to accommodate the number of containers outlined in Table 3-5 above.

3.6 WASTE PRESENTATION AND COLLECTION

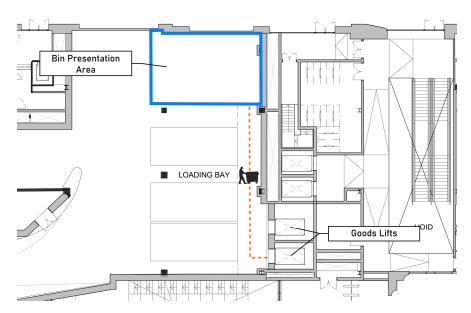
- 3.6.1 Each waste stream will be collected multiple times per week by a commercial waste contractor.
- 3.6.2 On collection days the on-site FM team will transfer the bins from the lower ground level estate commercial waste store in Building 3 to the ground level bin presentation area via the goods lift located adjacent to the service yard.
- 3.6.3 The route from the estate commercial waste store to the goods lifts in Building 2 is shown in Figure 3-6 below.

Figure 3-6 Lower Ground Level Goods Lift Access



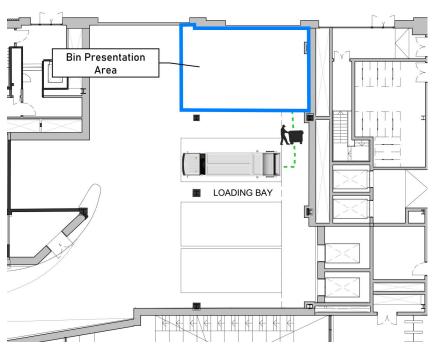
3.6.4 If necessary, individual waste streams will be presented for collection separately during timed windows agreed with the commercial waste collection contractor to minimise the use of space within the service yard.

Figure 3-7 Ground Level Bin Presentation Area



- 3.6.5 The commercial waste contractor will attend the loading bay and collect the bins directly from the bin presentation area, returning them once emptied.
- 3.6.6 An indicative loading position for the Refuse Collection Vehicle (RCV) is shown in Figure 3-8 below.

Figure 3-8 Ground Level Service Yard - Waste Collection Access



3.6.7 As per the Guidance, the RCV will access and egress the Proposed Development in a forward gear, performing a turning manoeuvre within the loading bay.

- 3.6.8 APPENDIX B includes swept path analysis for vehicles accessing the loading bays.
- 3.6.9 As per BS5906:2005 the path between the loading bay and the RCV will be:
 - Minimum width 2 metres;
 - Free from kerbs or steps;
 - Solid foundation, and
 - Suitably paved with a smooth continuous finish.
- Following collection, the on-site FM team will return the empty bins to the lower ground level estate commercial waste store in Building 3.

4 SUMMARY AND CONCLUSION

4.1 SUMMARY

COMMERCIAL WASTE

- 4.1.1 Estimated weekly waste generation has been calculated using waste metrics found in LBI's *Recycling and Refuse Storage Requirements.*
- 4.1.2 Commercial occupiers will temporarily store segregated waste within their tenanted areas.
- 4.1.3 A commercial waste store will be provided at lower ground level with separate residual waste, DMR, food waste and glass waste storage, designed to BS5906:2005 standards.
- 4.1.4 On a daily basis, the on-site FM team will collect the segregated waste from the office areas in a suitable trolley and transfer it to the estate commercial waste store at basement level using the service lift.
- 4.1.5 Residual waste and DMR will be stored in 1,100-litre Eurobins, while food waste and glass waste will be stored in 240-litre wheeled bins.
- 4.1.6 Residual waste and DMR will be compacted to reduce volume on site.
- 4.1.7 On collection days the on-site FM team will transfer the bins for presentation in the loading bay.
- 4.1.8 No bins will be presented on the public highway.
- 4.1.9 On collection days the commercial waste collection contractor will position their RCV in the loading bay and empty the bins, returning them when finished.
- 4.1.10 When the bins have been emptied, the on-site FM team will return them to the estate commercial waste store at lower ground level.

4.2 CONCLUSION

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



APPENDIX A

NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE



NATIONAL WASTF POLICY

MHCLG, NATIONAL PLANNING POLICY FRAMEWORK (2021)3

The revised National Planning Policy Framework was updated on 20th July 2021 and sets out the government's planning policies for England and how these are expected to be applied. It does not include anything of relevance to waste management that would be applicable to the Proposed Development.

DCLG, NATIONAL PLANNING POLICY FOR WASTE (2014)4

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

DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS (DEFRA), OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND (2018)⁵

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)6

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

WASTE HIERARCHY

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

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

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

⁴ https://www.gov.uk/government/publications/national-planning-policy-for-waste

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

⁶ https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

Figure A1.1: The Waste Hierarchy



The main principles of the Waste Hierarchy are:

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

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

HM GOVERNMENT, A GREEN FUTURE: OUR 25 YEAR PLAN TO IMPROVE THE ENVIRONMENT (2018)⁷

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.

 $^{^{7}\ \}underline{\text{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf}$

LONDON WASTE POLICY & GUIDANCE

GLA, THE LONDON PLAN (MARCH 2021)8

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)9

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:

- o 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.

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

⁸ GLA (2021) The London Plan

⁹ GLA (2018) London Environment Strategy

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).'

LOCAL WASTE POLICY & GUIDANCE

NLWA, RESIDUAL WASTE REDUCTION PLAN (2020)

The residual waste reduction plan (the plan) is NLWA's two-year plan of communications (including face-to-face outreach and presentations) and policy work to encourage a reduction in residual waste in north London, supporting borough activities and services in north London.

Whilst this document is worthy of inclusion as part of this policy review, there is no direct relevance to operational waste management at the Proposed Development.

NLWA, NORTH LONDON WASTE PLAN: PROPOSED SUBMISSION PLAN (JANUARY 2019)

The NLWP has two main purposes:

- Ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to manage waste generated in North London; and
- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

Whilst this document is worthy of inclusion as part of this policy review, there is no direct relevance to operational waste management at the Proposed Development.

LBC, LOCAL PLAN (2017)

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures Council has robust and up-to-date planning policies that responded to developing circumstances and the Borough's unique characteristics. The Local Plan will cover the period from 2016-2031. The following extract is applicable to the Proposed Development:

'Policy CC5 Waste

'The Council will seek to make Camden a low waste borough.

We will:

- a. aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;
- b. deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;
- c. safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and
- d. make sure that developments include facilities for the storage and collection of waste and recycling."

LBC, WASTE STORAGE AND ARRANGEMENTS FOR RESIDENTIAL AND COMMERCIAL UNITS (SUPPORTING DOCUMENT FOR PLANNING GUIDANCE CGP1 DESIGN STORAGE AND COLLECTION FOR RECYCLING AND WASTE) (2014)

Its key aim is to assist those involved in the design and management of buildings to best provide for the temporary storage and transfer of wastes to maximise the type and amounts that can be reused or sent for recycling or repurpose.

APPENDIX B

SWEPT PATH ANALYSIS



