EUSTON TOWER

Outline Site Waste Management Plan

December 2023

British Land

EUSTON TOWER

OUTLINE SITE WASTE MANAGEMENT PLAN

PROJECT NO. 22/181 DOC NO. D013

DATE: DECEMBER 2023

VERSION: 1.0

CLIENT: BRITISH LAND PROPERTY MANAGEMENT LIMITED

Velocity Transport Planning Ltd

www.velocity-tp.com

DOCUMENT CONTROL SHEET

Document Reference

Project Title	Euston Tower
Document Title	Outline Site Waste Management Plan
Project Number	22/181
Document Number	D013
Revision No.	1.0
Document Date	DECEMBER 2023

Document Review

	Name	Date completed
Prepared By	Oliver James	December 2023
Reviewed By	Peter Hambling	December 2023
Authorised By	Tom Mabelson	December 2023

Notes

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

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1.1 PROJECT INTRODUCTION

1.1.1 This Outline Site Waste Management Plan (SWMP) has been prepared by Velocity Transport Planning, on behalf of British Land Property Management Limited. (hereafter referred to as 'the Applicant'), to support a planning application for the redevelopment of Euston Tower (hereafter referred to as the 'Proposed Development') The local planning authority is London Borough of Camden (LBC).

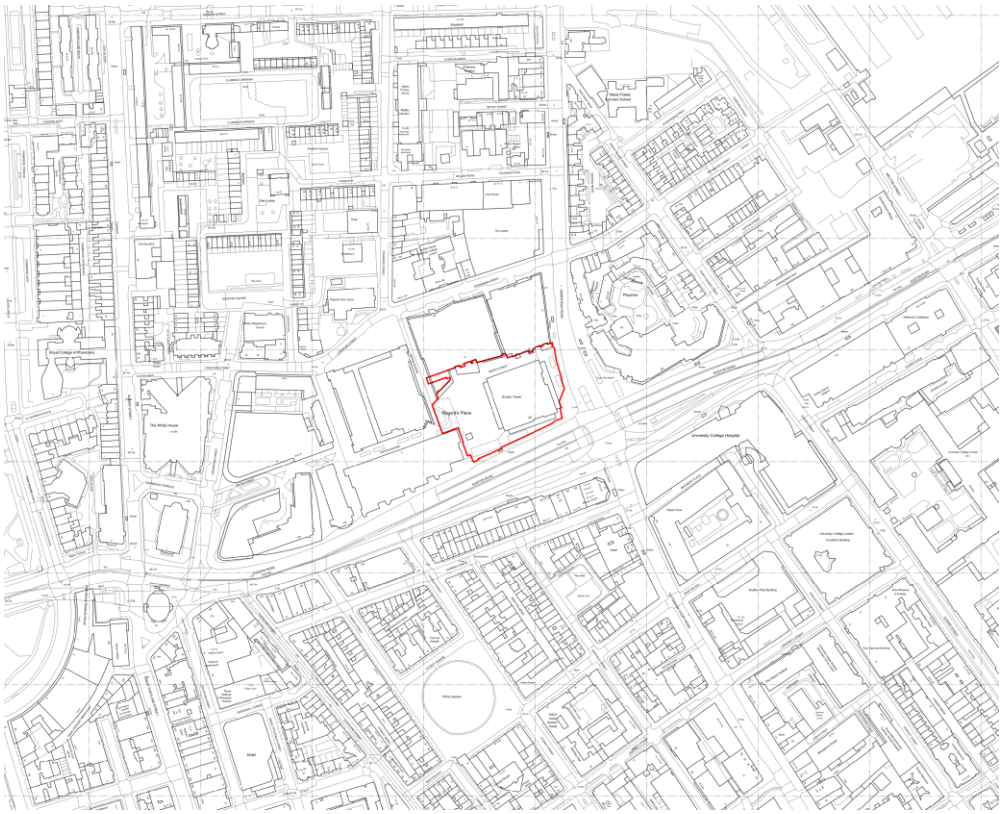
1.1.2 This Outline SWMP details how overarching waste management processes and practices will be undertaken during the demolition, site preparation, and construction phases of the site.

1.2 SITE LOCATION

1.2.1 Euston Tower is bounded to the north by Brock Street, a private pedestrianised area within Regent's Place; to the east, the site is bounded by Hampstead Road (A400) and to the south by Euston Road (A501), both form part of the Transport for London Road Network (TLRN); and west by Regent's Place Plaza, which is also a private pedestrianised area within Regent's Place.

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 Euston Tower is a 36-storey tall building standing on the northern edge of central London, situated in the south-west of the London Borough of Camden.

1.3.2 Located on the corner of Euston and Hampstead Road, at the top of Tottenham Court Road the tower shares a busy intersection with The UCL Hospital campus and is directly opposite Warren Street Station. The current tower has a prominent presence, given its status as the tallest building in the borough aside from the nearby BT Tower, and as such acts as a physical landmark for London Euston, Euston Square and Warren Street stations as well as wayfinding for the wider neighbourhood.

1.3.3 Completed in 1970, Euston Tower is designed in the 'International Style'. Above a two-storey extruded glazed podium, the tower has a pinwheel plan clad in aluminium curtain walling with green reflective tinted glazing. It was designed as an office building to provide cellular office accommodation typical of the period and formed part of a wider masterplan known as The Euston Centre. It now stands on the eastern edge of the pedestrianised Regent's Place Estate.

1.3.4 Since its completion, it has undergone a small refurbishment to but beyond this its external form and façade remain as originally constructed. These elements of the building are in a generally poor condition, due to a combination of wear in use and the quality of the original detailing. Gradually it has been vacated, and since 2021, with the exception of the retail at grade level, the building is entirely disused.

1.4 PROPOSED DEVELOPMENT

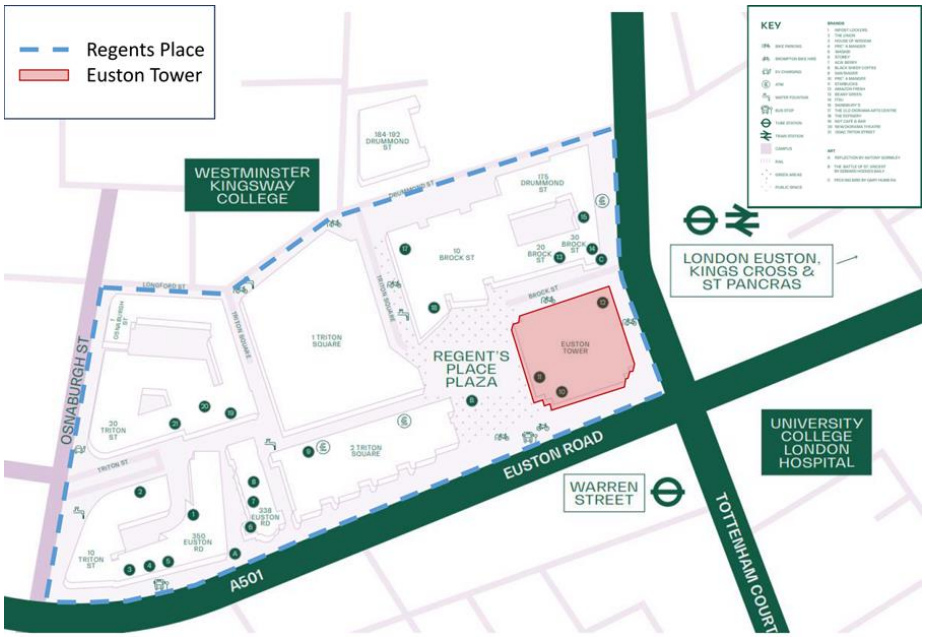
1.4.1 This Outline SWMP has been prepared in support of an application at Euston Tower, 286 Euston Road, London, NW1 3DP.

1.4.2 Full planning permission for the following development:

> *"Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works."*

1.4.3 **Figure 1-2** below shows the extent of the proposed development in relation to the Regent's Place Plaza.

Figure 1-2 Euston Tower - Proposed Development



1.5 CIRCULAR ECONOMY CONSIDERATIONS

1.5.1 This report includes details of the project objectives that have been set based on industry targets informed by prevailing policy.

1.5.2 The targets set out in the London Plan Policy SI 7 will be targeted, which involves 95% reuse/recycling/recovery of construction, demolition, and excavation material streams.

1.5.3 No more than 5% of demolition, excavation or construction waste will be sent to landfill.

1.5.4 The developer will be contractually responsible for all site waste reporting for the Proposed Development. Specific waste quantification and monitoring will assist in determining the success of waste management initiatives employed on site and progress against targets set should be relayed back to the appropriate stakeholders.

1.6 DOCUMENT STRUCTURE

1.6.1 This report is set out in the following sections:

- **Section 2**: Waste Legislation, Policy & Guidance;
- **Section 3:** Demolition and Excavation Waste;
- **Section 4**: Construction Waste; and
- **Section 5**: Summary and Conclusion.

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 SWMP.

2.2 NATIONAL LEGISLATION AND GUIDANCE

2.2.1 A list of relevant national waste legislation is outlined below in reverse chronological order:

2.2.2 **The Environment Act 2021 –** The UK's new framework of environmental protection covering air quality, water, biodiversity and resource efficiency/waste reduction.

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 (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.

2.2.5 **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.

2.2.6 **Environmental Protection Act 1990 –** A fundamental statute which establishes the structure and authority for waste collection. Local authorities are tasked with the collection of household waste under Section 45, while businesses have a duty of care for the disposal of commercial waste under section 34. Part II of the Act was originally implemented by the Duty of Care Regulations 1991.

2.3 NATIONAL, LONDON AND LOCAL WASTE POLICY

2.3.1 The relevant national, London and local waste policy reviewed during the preparation of this SWMP 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);
- Greater London Authority (GLA), *The London Plan 2021* (March 2021); and
- GLA, *London Plan Guidance: Circular Economy Statements* (March 2022);
- LBC, *Local Plan* (2017);
- LBC, Guide for Contractors Working in Camden (February 2008); and
- LBC, Euston Area Plan (January 2015).

3 DEMOLITION AND EXCAVATION WASTE

3.1 INTRODUCTION

3.1.1 This section outlines the estimated waste anticipated to be generated by the existing structures on the Site of the Proposed Development during the demolition and excavation phases.

3.1.2 All estimates should be considered indicative and will require updating by the relevant contractors upon appointment.

3.2 ESTIMATION OF DEMOLITION AND EXCAVATION WASTE

DEMOLITION WASTE

3.2.1 The following section has been informed by the Pre-Demolition Audit completed by Reusefully on 20th April 2022.

3.2.2 **Figure 3-1** summarises the itinerary of non-hazardous waste materials expected to be generated from the demolition phase of the Proposed Development.

Figure 3-1 Summary of Demolition Waste Generated

Material	Tonnes	% By Weight
Concrete	36,981.12	91.76
Steel	1,942.39	4.82
Brick	388.50	0.96
Glass	378.37	0.94
Aluminium	305.13	0.76
PVC	120.30	0.30
Gypsum	105.38	0.26
Softwood	34.31	0.09
Ceramic	15.84	0.04
Chipboard	12.22	0.03
Fibreboard	7.18	0.02
Aggregate	6.48	0.02
Insulation	4.47	0.01
Vinyl	1.34	0.00
Total	**40,303.05**	**100.00**

3.2.3 Note that the audit summarised overall demolition waste estimates by volume. These estimates were converted to tonnes using industry standard conversion metrics.

3.2.4 Based on the results found in the Pre-Demolition Audit, two Key Demolition Products (KDPs) were identified, as follows:

- Inert Materials; and
- Metals

3.2.5 The predominant KDP on site has been identified as inert materials, which are a group of materials that are handled and processed in the same manner during demolition and subsequent processing.

3.2.6 The inert materials generated by the demolition process are located within the following elements on site:

- Floor slabs;
- Internal walls; and
- Façades.

3.2.7 Figure 3-2 below summarises the details of the inert materials present on site, including tonnage and reclamation or recycling rate.

Figure 3-2 Inert Demolition Waste

Material	EWC Code	Tonnage	Recommended Processing (%)	
			Reclamation	Recycling
Bricks	17 01 02	388.50	0	100
Ceramic	17 01 03	15.84	0	100
Concrete	17 01 07	36,981.12	0	100
Aggregate	17 01 01	6.48	0	100
	Total	**37,391.94**	**0**	**100**

3.2.8 The second KDP on site has been identified as metals, with use across all structures for a number of purposes.

3.2.9 The metal generated by the demolition process are located within the following elements on site:

- Structural Slabs;
- Doors and windows;
- Walls;
- Stairs; and
- Pipes and ducting.

3.2.10 **Figure 3-3** below summarises the details of the secondary KDP on site, including tonnage and reclamation or recycling rate.

Figure 3-3 Mixed Metals Demolition Waste

Material	EWC Code	Tonnage	Recommended Processing (%)	
			Reclamation	Recycling
Aluminium	17 04 07	305.13	0	100
Steel	17 04 05	1,942.39	0	100
	Total	**2,247.52**	**0**	**100**

EXCAVATION WASTE

3.2.11 Following demolition of the existing structures and the removal of any hard standing, excavation will be required to facilitate the structural requirements of the Proposed Development.

3.2.12 Excavation for the Proposed Development includes works associated with the alterations to the existing substructure, foundations and pile arisings.

3.2.13 Excavation estimates have been sourced from best advice provided by a demolition specialist. It is anticipated that these estimates will be superseded by a full cut and fill evaluation as part of a later design phase.

PILE ARISINGS, FOUNDATIONS AND SUBSTRUCTURE

3.2.14 The proposed high level structural foundations are anticipated to comprise of suspended Reinforced Concrete (RC) slabs supported on pile caps.

3.2.15 Estimated material excavated from the foundations are anticipated to include the following elements:

- Substructural RC walls and slabs;
- Pile arisings; and
- Pile caps;

3.2.16 It is estimated circa 12,670m^3 of excavated material will be produced. Applying an industry standard bulking factor of 1.2 to this volume equates to approximately **15,204m^3** of excavated material.

3.2.17 Assuming a conversion rate of 2 tonnes per 1m^3 material, this equates to **30,408** tonnes of material.

3.2.18 It is anticipated that this volume of material will decrease as the structural proposals are refined during the later design stages.

3.3 MANAGEMENT OF DEMOLITION AND EXCAVATION WASTE

3.3.1 Waste arising from site clearance, primary infrastructure and earthworks is expected to comprise made ground (hardcore, concrete and road planings) and natural materials including gravels and London clay.

3.3.2 It is proposed that any concrete or tarmac excavated on site is crushed for reuse as secondary aggregate. It should be noted that any potential reuse of materials should be undertaken under a Materials Management Plan in line with the CL:AIRE Code of Practice.

3.3.3 Any clean excavated material that cannot be reused on-site will be removed by licensed waste carriers and sent for reuse at another local development site, recycled into secondary aggregate or sent for disposal at appropriately licensed facilities (these are expected to be used for infill at quarry restoration sites).

3.3.4 Principle Contractors are expected to keep signed waste transfer notes (WTN) or consignment notes to document all the waste disposed of or transferred from the Site, retained for a period in accordance with all prevailing legislation.

3.3.5 For the purpose of this exercise, it is assumed that all made ground will be unsuitable for reuse on site and will be removed from site. This can be reviewed in more detail once sufficient on-site investigation and associated material testing has been conducted. All loads removed on site would be transferred to appropriately licenced facilities for reuse or recycling.

3.3.6 It is assumed that an investigation into potential contaminated land will take place on-site, followed by a site remediation plan if appropriate. Any contaminated material found that requires removal from the Site will be collected by suitable waste carriers and sent for disposal at appropriately licensed waste facilities.

3.3.7 It is anticipated that a standard condition would be applied to any planning permission that deals with undertaking investigations for contaminated land, site remediation measures, verification, and approval of a remediation plan, as well as informing the LPA of any unexpected contamination discovered.

3.3.8 **Table 3-1** below details the estimated number of vehicles required to remove the material generated during the site clearance and excavation phases.

Table 3-1 Excavation Material Generation and Vehicle Movements

On-Site Activity	Reused On-Site*	Material Removed from Site	Volume of Material (m^3)	Number of Vehicle Loads Required **
Removal of material associated with substructure, foundations Pile arisings	No*	Yes	15,204	1,521

** Until chemical and physical properties are established through appropriate testing methods, it is assumed all excavated material is unsuitable for reuse on site.*

*** Assumes 10m^3 volume HGVs*

4 CONSTRUCTION WASTE

4.1 CONSIDERATE CONSTRUCTORS SCHEME

4.1.1 Once appointed, the Principal Contractor(s) will register their site with the 'Considerate Constructors Scheme'. This is a national initiative, set up by the construction industry. Sites that register with the Scheme sign up and are monitored against a Code of Considerate Practice, designed to encourage best practice beyond statutory requirements.

4.1.2 The Scheme is concerned about any area of construction activity that may have a direct or indirect impact on the image of the industry as a whole. The main areas of concern fall into three categories: the environment, the workforce, and the general public. Waste management is a key area of focus and on-site considerations may include:

- How waste is avoided, reduced, reused, and/or recycled;
- Whether there is a Waste Management Plan/Strategy and how this is monitored; and
- The type of feedback received (if any) as to how much waste on-site is diverted from landfill.

4.1.3 It is expected that registered construction sites work in an environmentally conscious, sustainable manner.

4.2 SITE WASTE MANAGEMENT PLAN

4.2.1 As part of a drive to cut red tape, the Government revoked the requirement for Site Waste Management Plans (SWMPs) for construction projects costing over £300,000 as of 1 December 2013 and they are no longer statutory.

4.2.2 However, SWMPs remain good practice during construction and allow waste credits to be achieved under certification schemes such as BREEAM; one will be prepared by the Principal Contractor(s) once appointed, post planning consent.

4.3 ESTIMATED CONSTRUCTION WASTE

4.3.1 During each stage of the construction process there is the potential to generate waste from a variety of means, including the over-ordering or on-site damage of raw materials and construction process waste, such as material off-cuts, packaging, and chemical residues.

4.3.2 Opportunities for minimising construction waste are discussed in this section, considering issues such as reducing waste through selection of more sustainable raw materials and the implementation of effective on-site waste management practices.

4.3.3 The Building Research Establishment (BRE) have produced benchmarks from which to base performance credit allocation for construction waste arisings. The Site Waste Reduction Performance metric measures tonnes of waste/100m^2 of floor area.

4.3.4 **Table 4-1** shows the relevant construction waste target for the Proposed Development in tonnes.

Table 4-1 Construction Waste Resource Efficiency Target

BREEAM Credits Targeted	Tonnes/100m² GIA
Two Credits	≤6.5
Source: BRE: BREEAM WST 01 Construction Waste Resource Efficiency Targets	

4.3.5 **Table 4-2** shows the estimated construction waste arisings for all elements of the Proposed Development, based on GIA and applicable BRE metric.

Table 4-2 Estimated Construction Waste Arisings

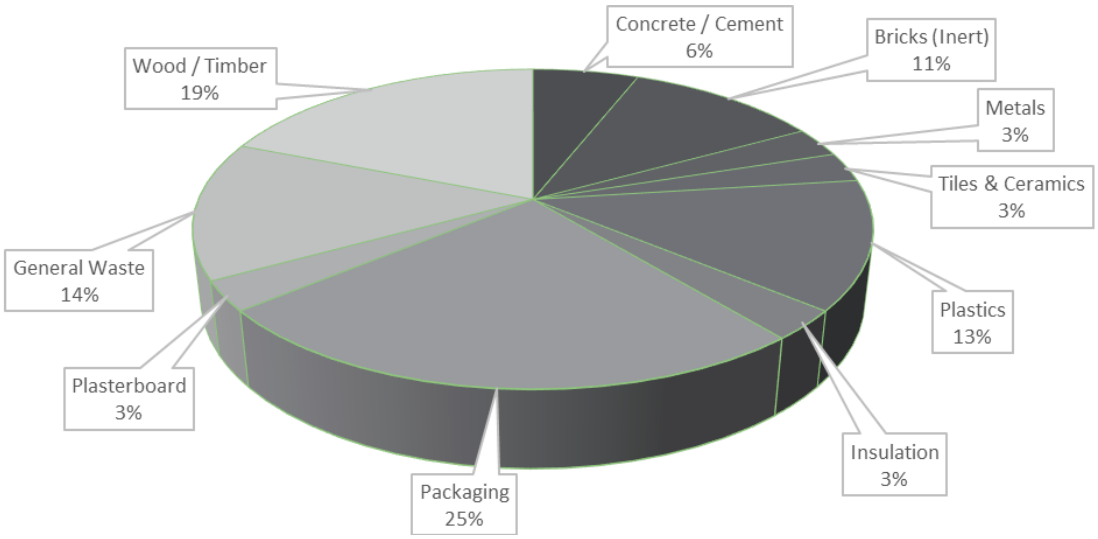
Description	GIA (m²)	Construction Waste Arisings (tonnes per 100m²)	Construction Waste (Tonnes)
Construction Waste	79,769	≤6.5	5,185

4.3.6 It is estimated that approximately 5,185 tonnes of waste may arise from the construction phase of the Proposed Development.

4.3.7 It should be noted that the estimated total figure also does not include waste from infrastructure development, such as utilities and pavements, which will add to the total construction waste volume. This is due to the fact that infrastructure development cannot be easily calculated using benchmarking data; and the GLA have no applicable information on this area of construction.

4.3.8 **Figure 4-1** illustrates the estimated composition of construction waste arisings for the Proposed Development, based on data from UK construction projects of a similar nature.

Figure 4-1 Estimated Construction Waste Composition (Source: SmartWaste)



4.3.9 **Table 4-3** shows the typical recovery rate of construction materials.

Table 4-3 Recovery Rate of Construction Materials

Material	Standard recovery * %	Good practice recovery * %	Best practice recovery ** %
Timber	57	90	95
Metals	95	100	100
Plasterboard	30	90	95
Packaging	60	85	95
Ceramics	75	85	100
Concrete	75	95	100
Inert	75	95	100
Plastics	60	80	95
Miscellaneous	12	50	95
Electrical equipment	Limited information	70 ***	95
Furniture	0-15	25	50
Insulation	12	50	95
Cement	Limited information	75	95
Liquids and oils	100	100	100
Hazardous	50	Limited information ****	Limited information ****

** Proposed waste management actions 'reuse' and 'recycling' are forms of waste recovery.*

*** This is a required recovery target for the type of waste electrical and electronic equipment (WEEE) likely to be produced from construction sites, e.g. Lighting (the WEEE regulations).*

**** This cannot be 100% as most hazardous waste streams (e.g. Asbestos) must be landfilled.*

4.3.10 The Proposed Development will target London Plan Policy of 95% reuse/recycling/recovery of construction and demolition waste, along with 95% beneficial use of excavation waste.

4.3.11 **Table 4-4** shows the type and volume of waste generated during construction based on the percentages provided in **Estimated Construction Waste Composition (Source: SmartWaste)**. The 'Best Practice Recovery (%)' in **Table 4-3** were used to determine the percentage recovered from the construction materials, as per GLA requirements.

Table 4-4 Type and Volume of Waste to be Generated During Construction

Material	Estimated Quantity (Tonnes)		
	Total	Recovered	Disposal
Concrete / Cement	311	311	-
Bricks (Inert)	570	570	-
Metals	156	156	-
Tiles & Ceramics	156	156	-
Plastics	674	640	34
Insulation	156	148	8
Packaging	1,296	1,231	65
Plasterboard	156	148	8
Miscellaneous	726	690	36
Wood/Timber	984	935	49
Total	**5,185**	**4,985**	**200**

4.3.12 Based on the indicative quantities summarised in **Table 4-4**, the recovery rate for construction waste is estimated to be approximately **96.1%**.

4.3.13 Construction waste arising will be investigated to determine its reuse potential on-site.

4.3.14 Where reuse on site is not possible, materials will be sent off-site for recovery as summarised in **Table 4-4**.

4.3.15 It is assumed that where it is not possible to reuse or recycle construction waste, contractors will use disposal routes that divert material from landfill, such as Energy from Waste (EfW), Refuse Derived Fuel (RDF) or Solid Recovered Fuel (SRF).

4.3.16 It should be noted that typical hazardous materials from construction sites that fall within the Hazardous Waste (England and Wales) Regulations 2005 include:

- Treated wood, glass, plastic (alone or in mixture) containing dangerous substances;
- Bituminous mixture containing coal tar and other dangerous substances;
- Metals containing oil, coal tar and other dangerous substances;
- Cables containing oil, coal tar and other dangerous substance;
- Rubble or hardcore containing dangerous substances;
- Soil, stones and dredging spoil containing dangerous substances;
- Gypsum materials such as plasterboard containing hazardous materials;
- Unused or unset cement;
- Paints and varnishes containing organic solvents or other dangerous substances;
- Paint or varnish remover;
- Adhesives and sealants containing organic solvent or other dangerous substances; and
- Empty packaging contaminated with residues of dangerous substances e.g. paint cans.

4.3.17 Hazardous waste materials will be stored in secure bunded compounds in appropriate containers which are clearly labelled to identify their hazardous properties and are accompanied by the appropriate assessment sheets.

4.3.18 Any fuels, oils and chemicals that are used will be stored in appropriate containers within secure bunded compounds in accordance with good site practice and regulatory guidelines and located away from sensitive receptors.

SUSTAINABLE SELECTION OF CONSTRUCTION MATERIALS

4.3.19 A sustainable materials selection strategy will be prepared prior to the construction of the Proposed Development. Measures will be taken, such as face-to-face 'toolbox talks' and provision of clear operational instructions, to ensure that contractors are committed to the operation of good practice measures on-site with emphasis on continual improvement and identifying appropriate opportunities to reduce waste, promote recycling and use recyclable materials. The ordering of appropriate, minimum amounts of building materials will be part of the materials selection strategy. Prefabricated materials will also be used wherever possible, for example Cross Laminated Timber (CLT).

SETTING TARGETS FOR REDUCING CONSTRUCTION WASTE

4.3.20 Appropriate targets and objectives will be set in relation to the minimisation, reuse, and recycling of any waste materials during earth works and construction. This will ensure that a clear action plan is generated for the management of specified types and quantities of materials identified for each of the construction stages. These targets will be agreed at the inaugural meeting between the Principal Contractors, the contractors and LBC.

4.3.21 To ensure that the system of waste prevention, minimisation, reuse and recycling is effective, consideration will be given to the setting of on-site waste targets and a suitable programme of monitoring at regular intervals to focus upon:

- Quantifying raw material wastage;
- Quantifying the generation of each waste stream;
- Any improvements in current working practices;
- Methods by which the waste streams are being handled and stored; and
- The available waste disposal routes used, e.g. landfills, waste transfer stations.

4.3.22 The Principal Contractors will be responsible for the setting and review of waste targets from the outset of the development process to ensure that high standards are maintained with the emphasis being on continual improvement. Specific waste quantification and monitoring will assist in determining the success of waste management initiatives employed on each construction site and progress against these targets should be relayed back to the appropriate stakeholders.

ACHIEVING REDUCTIONS IN CONSTRUCTION WASTE - PROMOTION OF BEST PRACTICE

4.3.23 As part of the encouragement of on-site best practice, there will also be a need to ensure that suppliers of raw materials to the Proposed Development are committed to reducing any surplus packaging associated with the supply of any raw materials. This includes the reduction of plastics (i.e. shrink wrap and bubble wrap), cardboard and wooden pallets. This may involve improved procurement and consultation with selected suppliers regarding commitments to waste minimisation, recycling, and the emphasis on continual improvement in environmental performance.

4.3.24 **Table 4-5** below summarises the most important mitigation measures to minimise the potential waste of on-site materials during construction. It is important to note, however, that not all construction materials will be provided by local suppliers.

Table 4-5 Measures to Reduce Waste of On-Site Construction Materials

Ordering	**Delivery**
Avoid: • Over-ordering (order 'just in time') • Ordering standard lengths rather than lengths required • Ordering for delivery at the wrong time (update programme regularly)	Avoid: • Damage during unloading • Delivery to inappropriate areas of the Site • Accepting incorrect deliveries, specification or quantity
Storage	**Handling**
Avoid: • Damage to materials from incorrect storage • Loss, theft or vandalism through secure storage and on-site security	Avoid: • Damage or spillage through incorrect or repetitive handling

4.3.25 Where practicable, waste streams that have the potential to be reused on-site or transported off-site for recycling will need to be segregated. Although every effort will be made to retain all suitable materials on-site, it is possible that some of these materials cannot be reused or recycled during the construction process. In these situations, the Site Managers will work to identify a nearby Transfer Station or suitably licensed facility in order for material to be redistributed as fill on other suitable sites. This represents the most sustainable alternative to landfill disposal.

CONSTRUCTION MATERIALS AND WASTE STORAGE

4.3.26 Emphasis will be placed on the provision of appropriate storage conditions for raw materials and key waste streams relating to each development. This will include the segregation of material for reuse or recycling on-site. Where this is not practicable, materials will be segregated for off-site recycling.

4.3.27 The location of the waste storage areas will be clearly labelled, identifying the materials that can be received. Provisions that will be made include:

- Temporary offices and work compounds on-site will retain all details relating to the waste strategy for the site, health and safety and monitoring and reporting details;
- Storage areas for raw materials and assembly areas for construction components will be located away from sensitive receptors;
- Clearly identified containers for segregated waste streams for reuse and recycling; and
- Dedicated skips will be provided for any construction waste that requires off-site disposal.

4.3.28 In addition, the provision of effective and secure storage areas for construction materials is important to ensure that potential loss of material from damage, vandalism or theft is avoided. These measures will be supported by ensuring well-timed deliveries to the Site, providing on-site security, and installing temporary site security fencing.

4.3.29 Implementation of good practice measures in terms of on-site storage and security practices will assist in reducing unnecessary wastage of material and ensure that high standards are maintained throughout the development process.

MANAGING TRANSPORT AND TRAFFIC IMPACTS FROM CONSTRUCTION

4.3.30 The logistics associated with construction waste are affected by a wide range of factors. The quantity and types of waste materials generated will fluctuate during the construction phases and the resulting number of waste collections will be dictated by a range of variables, including the amount of storage space for waste, the capacity of waste containers used, the materials segregated for recycling and whether any on-site processes are used for reducing the volume of waste (compactors / balers / shredders etc.).

4.3.31 The Principal Contractors will be expected to provide construction waste logistics forecasts, which will be discussed with waste contractors and LBC following appointment of relevant parties.

4.3.32 The impact of traffic associated with the movement of construction and waste materials on surrounding neighbourhoods and the local road network will be minimised by a combination of factors. These include reducing the need to import / export materials; and minimising off-site removal of waste to landfill. Dedicated haulage routes will be agreed with LBC to minimise disturbance to local communities.

5 SUMMARY & CONCLUSION

5.1 SUMMARY

SITE PREPARATION AND EARTHWORKS

5.1.1 Waste arising from site clearance, primary infrastructure and earthworks is expected to comprise made ground (hardcore, concrete and road planings) and natural materials including gravels and London clay.

5.1.2 Any clean excavated material that cannot be reused on-site will be removed by licensed waste carriers and sent for reuse at another local development site, recycled into secondary aggregate or sent for disposal at appropriately licensed facilities.

5.1.3 Any contaminated material found that requires removal from the Site will be collected by suitable waste carriers and sent for disposal at appropriately licensed waste facilities.

CONSTRUCTION WASTE

5.1.4 During each stage of the construction process there is the potential to generate waste from a variety of means, including the over-ordering or on-site damage of raw materials and construction process waste, such as material off-cuts, packaging, and chemical residues.

5.1.5 Target have been determined from BRE's *BREEAM WST 01: Construction Waste Resource Efficiency Targets* to estimate the tonnage of construction waste produced. The site waste reduction performance target measures tonnes of waste/100m^2 of floor area.

5.1.6 It is estimated that approximately 5,185 tonnes of waste may arise from the construction of the Proposed Development, assuming best practice performance is realised.

5.1.7 It should be noted that the estimated total figure does not include waste from infrastructure development, such as utilities and pavements, which will add to the total construction waste volume. This is due to the fact that infrastructure development cannot be easily calculated using benchmarking data; and the BRE have no applicable information on this area of construction.

5.1.8 Where it is not possible to reuse or recycle construction waste, contractors will be expected to seek disposal routes that divert material from landfill, such as Energy from Waste (EfW), as Refuse Derived Fuel (RDF) or Solid Recovered Fuel (SRF).

5.1.9 Hazardous waste materials will be stored in secure bunded compounds in appropriate containers which are clearly labelled to identify their hazardous properties and are accompanied by the appropriate assessment sheets.

5.1.10 Any fuels, oils and chemicals that are used will be stored in appropriate containers within secure bunded compounds in accordance with good site practice and regulatory guidelines and located away from sensitive receptors.

5.1.11 Appropriate targets and objectives will be set in relation to the minimisation, reuse, and recycling of any waste materials during earth works and construction. This will ensure that a clear action plan is generated for the management of specified types and quantities of materials identified for each of the construction stages. These targets will be agreed at the inaugural meeting between the Principal Contractors, the contractors and LBC.

5.1.12 The Principal Contractors will be responsible for the setting and review of waste targets from the outset of the development process to ensure that high standards are maintained with the emphasis being on continual improvement. Specific waste quantification and monitoring will assist in determining the success of waste management initiatives employed on each construction site and progress against these targets should be relayed back to the appropriate stakeholders.

5.1.13 Emphasis will be placed on the provision of appropriate storage conditions for raw materials and key waste streams relating the Proposed Development. This will include the segregation of material for reuse or recycling on-site. Where this is not practicable, materials will be segregated for off-site recycling.

5.1.14 The Principal Contractors will be expected to provide construction waste logistics forecasts, which will be discussed with waste contractors and LBC following appointment of relevant parties.

5.1.15 The impact of traffic associated with the movement of construction and waste materials on surrounding neighbourhoods and the local road network will be minimised by a combination of factors. These include reducing the need to import / export materials; and minimising off-site removal of waste to landfill. Dedicated haulage routes will be agreed with LBC to minimise disturbance to local communities.

5.2 CONCLUSION

5.2.1 This Outline SWMP has considered the need to lessen the overall impact of waste generation through recycling of materials from the construction 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 AND LOCAL WASTE POLICY & GUIDANCE

NATIONAL WASTE POLICY

DLUHC, NATIONAL PLANNING POLICY FRAMEWORK (2023)[1]

The revised National Planning Policy Framework was updated in September 2023 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)[2]

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)[3]

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)[4]

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**.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf

[2] https://www.gov.uk/government/publications/national-planning-policy-for-waste

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

[4] 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)[5]

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.

[5] 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)[6]

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 SI 7 Reducing waste and supporting the circular economy*
>
> *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*
>
> *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*
>
> *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*
>
> *Policy SI 10 Aggregates*
>
> *An adequate supply of aggregates to support construction in London will be achieved by:*
>
> *1) encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site*

LONDON PLAN GUIDANCE: CIRCULAR ECONOMY STATEMENTS (MARCH 2022)[7]

The guidance document explains how to prepare a Circular Economy Statement to accompany planning applications that are referable to the Mayor as required by the Intend to Publish London Plan (London Plan) Policy SI7, or where boroughs have specified a lower threshold. It can also be used to inform non-referable schemes.

Circular Economy Statements are intended to demonstrate how a development, including any public realm and supporting infrastructure, will incorporate Circular Economy measures into all aspects of the design, construction and operation process. This will help to ensure that applicants seeking planning permission for relevant schemes:

- consider strategies to facilitate the transition towards a circular built environment;
- report against numerical targets that will facilitate monitoring of waste and recycling; and

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

[7] GLA (2022), *London Plan Guidance: Circular Economy Statements*
https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

- recognise opportunities to benefit from greater efficiencies that can help to save resources, materials and money.

With regard to site waste management, the guidance states the following estimates should align with the Site Waste or Resource Management Plan(s):

- *total waste arising for key streams (tonnes) (for demolition/strip-out, it should be the quantities of waste arising during the replacement and repair of parts of the building);*
- *percentage reuse on-site;*
- *percentage recycled or composted on-site*
- *percentage reuse off-site;*
- *percentage recycled or composted off-site;*
- *percentage to landfill;*
- *percentage to recovery; and*
- *for demolition/strip-out and construction, description of design measures to reduce the likely waste arising (to be submitted in supporting document).*

LOCAL WASTE POLICY & GUIDANCE

LBC, LOCAL PLAN (2017)[8]

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.*
>
> *Waste Management Plan:*
>
> *To ensure an integrated approach to waste management and the highest possible reuse and recycling rates, the Council will encourage the submission of a site waste management plan prior to construction.'*

[8] LBC (2017) *Local Plan*

https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6

LBC, GUIDE FOR CONTRACTORS WORKING IN CAMDEN (FEBRUARY 2008)[9]

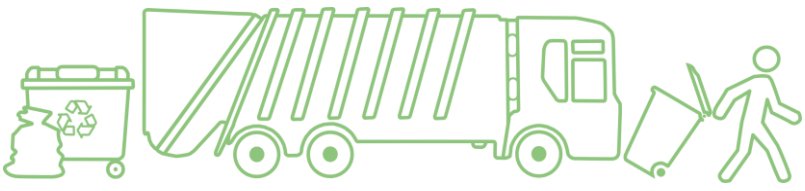
This guide aims to minimise disruptions caused by noise, vibration, dust, and smoke during construction and demolition in the borough. It provides essential information on environmental best practices for all parties involved, including developers, architects, contractors, site managers, workers, and the community. The goal is to maintain an acceptable level of disturbance without unnecessary constraints on contractors while fostering responsible construction, demolition, and refurbishment practices, with consideration for managing waste in an appropriate manner.

LBC, EUSTON AREA PLAN (JANUARY 2015)[10]

The Euston Area Plan (EAP) is underway to establish a comprehensive planning framework aimed at steering changes in the area. The primary focus is on the revitalization of Euston Station, with the overarching goal of extending the scope of regeneration to positively impact both the local community and the broader London area.

[9] LBC (2008) *Guide for Contractors Working in Camden*
https://www.camden.gov.uk/documents/20142/1269042/Guide+for+Contractors+in+Camden.pdf/18b7bb06-119e-9957-7037-fdb633f17ae6

[10] LBC (2015) *Euston Area Plan*
https://www.eustonareaplan.info/wp-content/uploads/2012/09/EAP-Adopted-January-2015-complete.pdf



VELOCITY