125 Shaftesbury Avenue

Operational Waste Management Strategy

Prepared by Waterman

Submitted on behalf of VREF Shaftesbury SCS

November 2024

Client Name: VREF Shaftesbury SCS

Document Reference: 20654102-WAT-XX-XX-SY-N-810001_P04_S5

Project Number: WIE20654

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Revision	Status	Date	Prepared by	Checked by	Approved by
P04	S5	November 2024	Sarah Owen	Ankit Singh	Sarah Owen Senior Associate

Comments

Comments

Comments

Revision		Status	
P*nn*	Preliminary (shared; non-contractual)	S1	Coordination
C*nn*	Contractual	S2	Information
		S3	Review & Comment
		S4	Review & Authorise
		S5	Review & Acceptance
		A0, A1, A*n*	Authorised & Accepted (*n*=work stage if applicable)

Disclaimer

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We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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1. Introduction

1.1 The Brief

VREF Shaftesbury SCS (the Applicant) has appointed Waterman Infrastructure & Environment Limited (Waterman) to prepare an operational waste management strategy (OWMS) report to support a planning application for 125 Shaftesbury Avenue, London WC2H 8AD.

125 Shaftesbury Avenue is an existing building within the London Borough of Camden (LB Camden). The proposal aims to retain and extend upon the structural frame (c.75% of the existing the structure is proposed to be retained in situ) and renew the external envelope. On the ground floor, it hosts several retail units including Nisbets and Salsa Bar.

The previous Planning Permission was Consented in 2016 (2016/5202/P) and has since lapsed.

1.2 The Proposed Development

The description of development is as follows:

"Remodelling, refurbishment and extension of the existing building to provide Use Class E commercial and retail space, amenity terraces, a new public route, relocated entrances, cycle parking, servicing and rooftop plant along with associated highway, landscaping and public realm improvements and other associated works"

1.3 The Site

Plans showing the arrangement of the proposed building is included in Appendix A.

The existing and proposed uses and areas schedules are set out below.

Table 1: Existing Uses and Areas Schedule

Existing Use	GIA (sq.m)
Office (Use Class E)	18,113
Retail (Use Class E)	3,189
Restaurant (Use Class E)	1,561
Total	**22,863**

Table 2: Proposed Uses and Areas Schedule [1]

Proposed Use	GIA (sq.m)	NIA (sq.m)
Retail (Class E)	862	464.2
Office* (Class E)	32,435	22,272.2
Total	**33,668**	**23,943**

*includes two affordable workspace units on the ground floor.

1.4 Report Scope

The purpose of this OWMS is to detail how waste will be stored, managed, and collected when the development is operational. It outlines the types and volumes of waste predicted to arise. It sets out anticipated waste storage capacity requirements (bin numbers) for the proposed uses.

[1] SoA issued 25/10/2024

1.5 Exclusions and Limitations

This report was undertaken in accordance with a scope of works agreed between Waterman and the Applicant.

The benefit of this report is made to VREF Shaftesbury SCS.
Waterman has endeavoured to assess all information provided to it during this work but makes no guarantees or warranties as to the accuracy or completeness of this information.

The conclusions resulting from this study are not necessarily indicative of future conditions or operating practices at the site.

2. Policy, Guidance and Standards

The following policy, guidance, and standards were considered in developing this OWMS.

2.1 The Building Regulations 2010 Approved Document H[2]

This Approved Document provides practical guidance. It sets out the requirements of Schedule 1 and Regulation 7 of the Building Regulations 2010 (SI 2010/2214) for England and Wales. Requirement H6, *"Solid Waste Storage"* specifies:

"(1) Adequate provision shall be made for storage of solid waste.

(2) Adequate means of access shall be provided:

(a) for people in the building to the place of storage

(b) from the place of storage to a collection point […]"

Requirement H6 stipulates waste storage should be designed and sited so as not to be prejudicial to health or local amenity.

2.2 British Standard 5906:2005[3]

This British Standard (BS 5906:2005) is a Code of Practice for methods of storage, collection, segregation for recycling and recovery, and on-site treatment of waste. This standard relates to residential and non-residential buildings and healthcare establishments. It is applicable to new buildings, refurbishments and conversions of residential and non-residential buildings, including but not limited to retail and offices. It expands upon the legal requirements set out in The Building Regulations 2010, Approved Document H, requirement H6 as above. BS 5906:2005 advises that:

"Designers should consider:

- *easy and safe access for waste producers, including older persons or persons with disabilities;*
- *easy and safe access for collectors and collection vehicles;*
- *location and space (including avoidance of opportunity to cause nuisance or injury);*
- *protection against animal scavenging of waste;*
- *aesthetics of the development;*
- *noise (e.g. glass handling);*
- *ease of maintenance, including cleaning;*
- *robust construction;*
- *safety from fire risk and smoke;*
- *lighting;*
- *ventilation;*
- *sound insulation; and*
- *special requirements (e.g. separate storage and collection provisions for healthcare waste and bulky waste)."*

The document then goes on to provide specific guidance to enable calculations of storage capacity, issues to consider for different building types or occupiers, and design considerations for waste storage and handling areas. As well as recommending the maximum distances waste collection operatives should have to manoeuvre bins e.g., 10m for four wheeled bins or 15m for two wheeled bins.

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[2] GOV.UK (2010) *"The Building Regulations 2010, Drainage and Waste Disposal"* H6 Solid Waste Storage, page 53. Available at www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h (accessed 02 January 2024).

[3] British Standard BS 5906:2005: Waste management in buildings – Code of practice, December 2005 Revision, Committee reference B/508/1.

2.3 Greater London Authority

2.3.1 The London Plan 2021[4]

London Plan policy SI 7, reducing waste and supporting the circular economy, promotes the following targets:

- zero biodegradable or recyclable waste to landfill by 2026;
- at least 65% of municipal waste will be recycled by 2030 (requiring at least 75% of business waste to be recycled by 2030);
- designing developments with adequate, flexible, and easily accessible waste storage space; and
- supporting separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

A response to these targets is set out in section 4 below.

Policy SI 7 also requires that applications (that are referred to the Mayor) promote circular economy outcomes. All applications for referable development are required to submit a Circular Economy Statement (CES) which should demonstrate:

- how much waste the proposal is expected to generate;
- how waste will be managed in accordance with the waste hierarchy; and
- how performance will be monitored and reported.

2.3.2 Mayor of London's Circular Economy Statement Guidance 2022[5]

The Mayor of London published its CES guidance in March 2022 which explains how to prepare a CES compliant with London Plan policy SI 7.

The CES guidance encourages applicants to submit a draft operational waste management plan at planning application stage. The plan should demonstrate:

- how much operational waste the proposed development is expected to generate (in tonnes per annum);
- how and where waste will be managed in accordance with the waste hierarchy;
- adequate, flexible, easily accessible space for storing and collecting waste;
- the development supports separate collection of dry recyclables, food, and other waste;
- how operational performance will be monitored and reported;
- consideration of measures such as consolidated smart logistics and community-led waste minimisation schemes; and
- at least 75% of business waste will be recycled by 2030 (in order to achieve the London Plan target of 65% recycling of municipal waste).

[4] GLA London Plan 2021 available from https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021 (accessed 02 January 2024).
[5] GLA Circular Economy Statements Guidance (March 2022) available from https://consult.london.gov.uk/circular-economy-statements (accessed 16 January 2024).

2.4 LB Camden Planning Policy and Guidance

LB Camden has published guidance on waste storage and management arrangements to be taken into account by developers and architects.

2.4.1 Camden Planning Guidance "Design" January 2021 (CPG1)[6]

Section 8 of CPG1 sets out design and location and vehicle access requirements for waste storage areas relevant to commercial developments.

2.4.2 Waste storage and arrangements for residential and commercial units[7]

This is a supporting document for planning guidance CPG1. It includes an outline for a commercial waste strategy.

The published guidance above does not provide metrics for use in sizing waste storage facilities for non-residential uses and applicants are advised to take pre-application advice (see section 2.4.3). The guidance also refers to British Standard BS5906:2005 and therefore Table 1 of that standard has been considered along with the Employment Density Guide[8].

2.4.3 Informal Guidance

LB Camden waste officer was provided with a summary of the proposed OWMS. The officer provided detailed comments to which the Applicant responded. The email discussion is included at Appendix B. The comments have been taken into account in the preparation of this OWMS.

2.5 Other Guidance

The City of Westminster offers comprehensive guidance[9] in relation to waste storage requirements. Including the recommendation that 10% of the waste storage capacity of a development should be allocated to food waste. Whilst this guidance is not formally adopted outside the City of Westminster, it provides useful information considered in the absence of borough specific guidance.

[6] https://www.camden.gov.uk/documents/20142/4823269/Design+CPG+Jan+2021.pdf/086b8201-aa57-c45f-178e-b3e18a576d5e?t=1611580522411 (accessed 26 November 2024)
[7] https://www.camden.gov.uk/documents/20142/0/ES+Technical+Waste+Planning+Guidance+2018final+-+FV+%5BPDF%5D.pdf/4f682792-29fa-89ca-00b1-f2a7fb5a6dc1 (undated - accessed 26 November 2024)
[8] Employment Density Guide, 3rd Edition November 2015 (Homes & Communities Agency)
[9] City of Westminster document titled *"Recycling and Waste Storage Requirements"*, available here https://www.westminster.gov.uk/recycling-and-rubbish/waste-storage-planning-advice (accessed 18 December 2023), dated 2023.

3. Operational Waste Management Strategy

3.1 Overview

The OWMS consists of a bin-based system. Waste storage estimates have been calculated using the methods detailed in section 3.2 below.

There will be a single loading bay at ground level. The loading bay will be used to store the wastes arising from all uses, with all uses sharing bins. There will be additional storage provision at basement level for use in the event of missed collections. Weigh scales will be used to record each tenant's waste arisings.

Daily collection of wastes is proposed (Monday to Friday). There will be sufficient waste storage capacity to hold two-days' worth of waste to provide contingency, in case of missed collection. The contingency bins will be stored at basement level and brought to ground level using the nearby goods lift if required. A wheeled bin press will be used on residual waste and recyclables bins to reduce the number of bins to be serviced each day, a second wheeled bin press will be located in the basement for use in the event of breakdown of the unit in the loading bay.

The loading bay will allow for off-street servicing by providing a refuse vehicle bay and a 7.5m box van bay. Access to the loading bay remains on Stacey Street, accessed from New Compton Street. Large vehicles will need to reverse into the proposed vehicle loading bays. Vehicle access for servicing has been separately discussed with LB Camden Highways team.

The current government has confirmed it intends to introduce a deposit return scheme for single use drinks containers, with the scheme to roll out by autumn 2027. Should one or more tenants in the ground floor units be required to, or wish to, host a deposit return point, space will be made available in the loading bay or basement level bin store to separately store returned containers.

3.2 Estimated Waste Storage Requirements

Given issues identified with the use of the British Standard in particular for food and beverage uses and the absence of guidance on apportioning the volume across the different waste streams (see Table 3 below), guidance issued by selected other London boroughs has also been considered.

The London Plan 2021 policy SI 7 requirements also impact the bin complement.

Table 3: Waste Storage Estimation Factors

Use	Estimation method
Office (including affordable workspace)	British Standard 5906:2005 – volume arising per employee [50 L] per week x number of employees No. of employees assumed one per 10m^2 NIA (medium density, based on Employment Density Guide 2015[10]) Assume 15% weekly volume is residual waste stored in 1,100 litre Eurobins Assume 75% weekly volume is recyclable waste stored in 1,280 litre Eurobins Assume 10% weekly volume is food waste stored in 240 litre wheelie bins An 80% employee occupancy rate has been applied.
Retail	British Standard 5906:2005[11] – volume arising per m^2 [10 L] per week x floor space (weekly arisings) (based on shopping centre / department store – the volumes if supermarket use assumed are much greater at 100 – 150 L per week) Assume 25% weekly volume is residual waste stored in the same bins as for office waste

[10] Homes & Communities Agency, *"Employment Density Guide"*, third edition dated November 2015
[11] British Standard BS5906:2005: Waste management in buildings – Code of practice

Use	Estimation method
	Assume 75% weekly volume is recyclable waste stored in the same bins as for office waste
Restaurant[12]	City of Westminster – 3,500 L per 1,000sq.m with capacity split 20% paper / card, 20% other dry recyclables, 30% food waste, 30% residual waste Assumes all waste is stored in the same bins as the office waste, other than separate glass waste if relevant to tenant's business and used cooking oils.

The metrics set out above have been used to allocate sufficient space at ground and basement level for the storage of waste. The Net Internal Area (NIA) is used rather than GIA.

The use of three of the five ground floor units could be either retail or food and beverage. In order to be able to accommodate the wastes arising from both ground floor unit uses an assessment assuming the entire NIA of 464.2sq.m would be used as entirely retail or entirely food and beverage. This assessment is included in Appendix C. It finds that an entirely retail use would generate the greatest quantity of waste overall, whilst the food and beverage use would generate the greatest quantity of food waste. Therefore, a retail use for all three units has been assumed, with the food waste arising from an entirely food and beverage use also included. These calculations are also included in Appendix C.

Key points are:

- daily collection of compacted waste (residual waste 3:1 in 1,100 litre bins, MDR 2:1 in 1,280 litre bins) (Monday – Friday);
- daily collection of food waste (240 litre bins) (Monday to Friday);
- Two- days storage capacity (for missed collection contingency); and
- Two wheeled bin presses (for breakdown contingency).

The table below summarises the number and type of bins and related equipment within the proposed development.

Table 4: Summary of Bins and Equipment

Location	No. of 1,280L mixed dry recyclable (MDR) bins	No. of 1,100L residual waste bins	No. of 240L food waste bins	Equipment
Loading Bay	6	1	16	Wheeled bin press Weighing scales
Basement	5	1	-	Wheeled bin press

The loading bay will also have space to store waste cooking oils (barrels or other containers held in bunded containment) and glass (240 litre bin) if appropriate based on food and beverage tenant business. Should a food and beverage tenant be required to, or wish to, host a deposit return point, space will be available to hold the returned containers.

3.2.1 Collection

Daily collection of waste is proposed. Bins in routine use will all be used and stored in the ground floor loading bay, into which refuse collection vehicles can reverse and service the bins off street. This reduces the distance over which refuse collection operatives will need to move bins of compacted (and so heavier) waste and prevent disruption to traffic on Stacey Street.

RCV swept path analysis is shown on the drawings in Appendix A.

[12] British Standard BS5906:2005 has not been used for restaurants because it equates covers with dining spaces which is incorrect

3.3 Role of the Facilities Management Team

The proposed development will benefit from the presence of a facilities management (FM) team. The FM responsibilities will include:

- preparation of communications plan to ensure tenants understand the waste management procedures in place on moving into the building. Requirements to be regularly reiterated to tenants, including by information displayed in the tenant's units / offices and in the loading bay;
- managing waste reception from all areas of the building (e.g. instructing tenants staff on when to bring wastes to the loading bay and where to place wastes, providing clear signage and instructions);
- weighing wastes from each tenant and recording;
- operating the wheeled bin presses and ensuring space is available in bins in at all times;
- maintaining cleanliness of the loading bay and basement bin store including washing down the bins at least once per quarter (or arranging for a third party to undertake the work);
- arranging waste removal from the loading bay; and
- collating data on waste arisings (types and quantities) and where the various wastes are taken to (duty of care and to enable demonstration of recycling or recovery fates) with data relayed to tenants.

3.4 Review of OWMS in Context of LB Camden Guidance

With reference to the CPG1 guidance on design and location of waste storage areas, as set out in a table within paragraph 8.33 of the CPG1. The proposal to locate waste storage and collection in the enclosed private loading bay addresses the guidance requirements as far as is relevant at this stage of the design process. Aspects such as the need for signage and impervious surface finishes are noted and will be further detailed as the design progresses. The pre-application advice provided by the LB Camden has also been considered and addressed in the OWMS.

Vehicle access is addressed in the Transport Assessment and Delivery and Servicing Plan that accompany the planning application.

The proposed OWMS is in line with LB Camden's guidance.

4. Circular Economy Statement Principles

The following sections respond to the London Plan's policy and aspects of the CES expectations listed in section 2.3 above.

4.1 Operational Waste Storage Space

As described in section 3 above, the design includes adequate and easily accessible waste storage space. The proposed bin-based waste management system has been designed with flexibility in mind. The complement (number and type) of bins can be adjusted in response to the development's recycling rate, for instance, and will seek to achieve the 75% recycling target by 2030. No estimate is offered as to annual tonnage of waste given the uncertainties in converting volumes of wastes into tonnages.

The FM team will manage the waste storage space and monitor operational performance (e.g. rate and quality of recycling). It will liaise with the private waste collection contractor(s) if the opportunity to adjust or increase recyclable waste storage provisions arises.

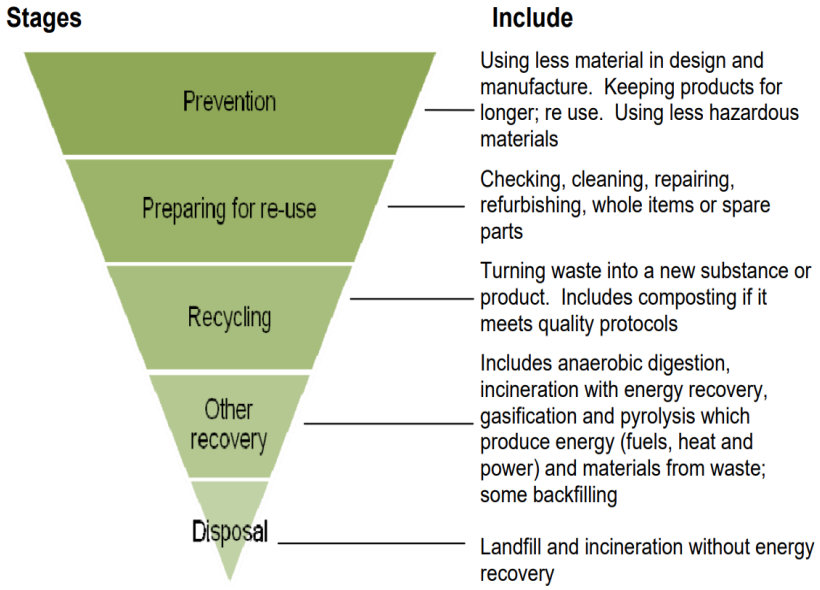
4.2 Operational Waste Collections

As described in section 3, the design supports the separate collection of residual, MDR, and food waste as well as waste cooking oils and glass dependent on the food and beverage tenant's business. MDR may be further segregated into card, paper, plastics and metal for example (depending on the nature of the waste produced by the occupants) for separate collection.

4.3 Implementation of the Waste Hierarchy

Regulation 12 of the Waste (England and Wales) Regulations 2011 requires waste producers or those handling waste to comply with the waste hierarchy (prevention, prepare for reuse, recycling, recovery, disposal) unless it can be justified on environmental or technical grounds that this is not appropriate. The waste hierarchy gives top priority to preventing waste. When waste is created, the hierarchy prioritises preparing it for reuse, then recycling, then recovery (including energy recovery), then last of all disposal (including landfill). In order to comply with London Plan policy SI 7, no recyclable or biodegradable waste should be despatched to landfill.

Figure 1: The waste hierarchy



Source: Guidance on applying the waste hierarchy, Defra, June 2011"

The FM team will be expected to take into account the waste hierarchy when making decisions about off-site waste management solutions for the tenant's waste. Guidance is available on the application of the waste hierarchy[13]. For the waste types to be routinely generated by the development, the following waste options should be preferred (after prevention actions have been taken to minimise the quantities of waste to be despatched from the development, and source segregation has been undertaken to minimise the proportion of residual waste):

Mixed dry recyclable wastes

In the first instance, the FM team should consider sorting the recyclables on-site to separate out paper / cardboard from plastics, metal, and glass. With despatch for further sorting / grading where the sorted recyclates are then despatched again for recycling back into packaging materials or paper products etc. rather than being used as fuel. The FM team should enquire of its waste management contractors as to what happens to the residual waste from sorting the mixed recyclables – it should not go to landfill.

Food waste

Waste producers should despatch food waste for anaerobic digestion rather than composting – which is recognised in the guidance as a deviation from the waste hierarchy supported by evidence.

Residual waste

It is this waste stream that requires most detailed discussion with waste management contractor to understand the fate of the waste and the energy efficiency of the solution. Ideally, waste producers will despatch for processing to produce refuse derived fuel (processing plants are able to recover some fractions of the mixed waste for recycling) where the fuel displaces coal or other fossil fuel. As a minimum the FM team should not despatch for landfill disposal.

4.4 Performance Monitoring and Reporting

The FM team will be responsible for managing the waste storage arrangements, as well as monitoring and reporting operational performance, including:

- liaising with waste management contractors, entering into contracts and complying with the waste producers duty of care requirements[14] (see below).;
- receipt of waste from tenants for weighing and placing in the correct bin;
- creating a waste collection schedule;
- reporting missed collections;
- ensuring waste is presented for collection at the appropriate time;
- fielding feedback from occupants and neighbours;
- responding to any incidents or problems with servicing activity; and
- regularly reviewing the development's performance and feeding back waste data to tenants.

The waste duty of care applies to anyone who produces commercial waste. It expects waste holders to *"…take all reasonable steps to ensure that when you transfer waste to another waste holder that the waste is* managed *correctly throughout its complete journey to disposal or recovery"*[15]. This can be done by carrying out detailed checks and requesting evidence to confirm waste has reached its final destination. The duty of care also requires waste producers to provide information including a written description of waste when it is transferred to another person (sometimes referred to as a waste transfer

[13] E.g. Defra, Guidance on applying the waste hierarchy, June 2011 https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy (accessed 16 January 2024)
[14] See Defra and Environment Agency guidance available from https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice (accessed 22 January 2024).
[15] Page 4 of the guidance referenced in footnote above.

note). The duty of care obligations therefore provide a mechanism through which the FM team can accurately check and record their waste collection activities by engaging in more detailed discussions with their waste management contractor(s).

4.5 Consideration of Consolidated Smart Logistics

All wastes arising from the proposed development will be collected in a single complement of bins, with arrangements for removal by private waste collection contractors made by the FM team. It is reasonable to assume the private waste collection operators will seek to optimise their routings. When it comes to appointing contractor(s), the following will be considered where possible to consolidate waste collections:

- specifying the use of split body RCVs that can collect more than one waste type at a time;
- ensuring waste collections take place on specific days at specific times; and
- requesting RCV data from contractor(s) such as routes and emissions which could be as part of duty of care audits or similar.

4.6 Consideration of Community-Led Waste Minimisation Schemes

Schemes will be considered where appropriate to the needs of future occupants, such as sharing and reuse networks for items like books or unsold food items[16].

[16] E.g. Olio Olio - Your Local Sharing App (olioapp.com)

Appendices

A. Site Plans

Proposed Level 00 GA Plan – Planning 125SA-DSD-ZZ-00-DR-A-20120 rev. P01.05 (DSDHA)

Note bins in loading bay ("08") labelled "W" for residual waste bins, "R" for mixed dry recyclables and "F" for food waste. Wheeled bin press also shown.

Proposed Level B1 GA Plan – Planning 125SA-DSD-ZZ-B1-DR-A-20118 rev. P01.4 (DSDHA)

Note bins in allocated space in west of basement labelled "W" for residual waste bins and "R" for mixed dry recyclables. Wheeled bin press also shown.

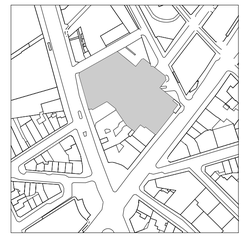
Proposed Ground Floor Plan

1 : 200

N

0 5 10 20M

NOTES



GENERAL NOTES:

Detail drawings show layouts and design intent and should be read in accordance with Architectural General Arrangement drawings, Architectural Outline Specification, and any Schedules.
Drawings may indicate elements to be designed and specified by other Consultants for coordination purposes. Please also refer to these drawings, schedules and specifications. Please report any discrepancies to the Architect for confirmation.
Full fabrication drawings to be provided for approval of all elements, details and interfaces.
All details and interfaces within Contractor Design Portion to be developed with Contractor and key Subcontractors. Sealant and weathertightness joints may be omitted for clarity.
All insulation thicknesses, levels and calculations to be confirmed as part of Stage 5 design.
All materials shown may be subject to change during Stage 5 design.
All drawings to be read in conjunction with other consultants' information (drawings, reports, specification)
Existing structure based on survey.
Structure shown is indicative. Please refer to structural engineer's information.
Areas are approximate and subject to change throughout design development of the proposals. Any areas measured from these plans relate to the areas of the building at the current stage of the design. Any decisions to be made on the basis of these predictions, whether as to forecast viability, pre-letting, lease agreements or the like should include due allowance for the increases and decreases inherent in the design development and construction processes.
Do not scale off drawing. Use figured dimensions only.
All dimensions to be verified on site before proceeding.
All discrepancies to be notified in writing to architect

DRAWING NUMBERING

10.000	Existing Drawings
20.000	Proposed Plans
30.000	Proposed Elevatons
40.000	Proposed Sections
50.000	Details (External)
60.000	Details (Internal)
70.000	Internal Spaces
90.000	Schedules

NOTES:

1. Drawings based on survey received by Plowman Craven recieved 10.07.2024. Structural drawings from AKT II
2. Columns are to be verified on site and via survey.
3. The above will be replaced by more accurate AKT II model and then, by post strip out survey information.

KEY

01. Entrance Lobby
02. Core
03. Commercial Provision
04. Plant Provision
05. Cycle Store
06. Substation
07. Retail Provision
08. Loading Bay
09. WC Provision & Cleaners Cupboard
10. Firefighting Core
11. Goods Lifts
12. Atrium Opening
13. Lift Overrun
14a. Accessible Landscaped Terrace
14b. Inaccessible Landscaped Terrace
15. Balcony
16. Loggia
17. Affordable Work Space
18. Potential Breakout Space
19. Changing Room
20. Third Party Escape

Planning Boundary
Site Ownership Boundary

P01.5	OCT 24	Planning Draft For Comment
P01.4	OCT 24	Planning Draft
P01.3	SEP 24	Issued to Property Agents
P01.2	AUG 24	WIP
P01.1	JUL 24	WIP

PLANNING

rev	date	author / check	comments

DSDHA
357 Kennington Lane London SE11 5QY
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project

125 Shaftesbury Avenue
London
WC2H 8HR
Edge and Mitsubishi

drawing title

Proposed Level 00 GA Plan - Planning

drawn	date	size	scale
JS	OCT 24	A1	As indicated

DSDHA project ref	revision	
	Suitability Code	Revision
361	S4	P01.5

drawing number

125SA-DSD-ZZ-00-DR-A-20120

Proposed Basement Plan

1 : 200

N

0 5 10 20M

NOTES

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07. Retail Provision
08. Loading Bay
09. WC Provision & Cleaners Cupboard
10. Firefighting Core
11. Goods Lifts
12. Atrium Opening
13. Lift Overrun
14a. Accessible Landscaped Terrace
14b. Inaccessible Landscaped Terrace
15. Balcony
16. Loggia
17. Affordable Work Space
18. Potential Breakout Space
19. Changing Room
20. Third Party Escape

Planning Boundary
Site Ownership Boundary

P01.4	OCT 24	Planning Draft For Comment
P01.3	OCT 24	Planning Draft
P01.2	SEP 24	Issued to Property Agents
P01.1	AUG 24	WIP

PLANNING

rev	date	author / check	comments

DSDHA
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project

125 Shaftesbury Avenue
London
WC2H 8HR
Edge and Mitsubishi

drawing title

Proposed Level B1 GA Plan - Planning

drawn	date	size	scale
JS	OCT 24	A1	As indicated

DSDHA project ref	revision	
	Suitability Code	Revision
361	S4	P01.4

drawing number

125SA-DSD-ZZ-B1-DR-A-20118

B. Pre-application Liaison

Email exchange between LB Camden waste officer and Waterman

Sarah Owen

From: Sarah Owen
Sent: 07 November 2024 10:08
To: 'Linda Hall-Brunton'
Cc: Shahida Sanessie; 'David Fowler'; 'Aga Szedzianis'; 'Natalie Davies'; Barry Cho; 'Zivile Volbikaite'; KFong@geraldeve.com; 'Anna Gargan'; Vincent Lasseaux; Seb Brettell
Subject: RE: 125 Shaftsbury Avenue - request for waste management pre-app consultation

Hi Linda

Thank you for your feedback. I apologise for the length of time it has taken us to come back to you. The details of the scheme are still settling which has made it tricky to answer all of your questions in full. We do provide responses to the majority of your advice and comments below – in italics throughout your email. We would also like to take up your offer to meet online, please could you let us have a few times you are available in the next week or so.

Kind regards

Sarah

Sarah Owen
Senior Associate
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From: Linda Hall-Brunton <Linda.Hall-Brunton@camden.gov.uk>
Sent: 09 October 2024 11:41
To: Sarah Owen <sarah.owen@watermangroup.com>
Cc: Shahida Sanessie <Shahida.Sanessie@camden.gov.uk>
Subject: RE: 125 Shaftsbury Avenue - request for waste management pre-app consultation

Hi Sarah

Thank you for the attached note. It is very helpful. I would be happy to meet online to discuss further.

How many individual units will be created between the office use and retail uses is it 6 in total or more? Legally each business can set up their own arrangements for their EA Waste Collection Providers. However you can include a clause within the tenancy agreement to suggest that a shared waste arrangement is complied with to save space.

Waterman comment: *The proposed development is a deep retrofit rather than a new build. The applicant is seeking to make best use of the existing structure to provide high quality office accommodation, an active ground floor with improved public realm. The building benefits from an existing loading bay and the proposed waste management strategy seeks to provide an efficient service where all waste collections can be undertaken off road.*

There are 5 no. ground floor units. In which we anticipate a minimum of 3 no. retail tenants including a potential affordable workspace to Stacey Street. The office tenancy arrangement is to be confirmed based upon market feedback and will either be a single anchor tenant or two or more tenants. Tenancy agreements will be used as you suggest to enable efficient waste storage and collection in the loading bay.

For the purpose of the design and build planning we need to plan for all options.

Option 1- Allow each unit to prepare and hold their waste 2 days + within a small storage room on their floors bs5906 by design. They would be responsible for bringing down all of their segregated wastes to the Holding bay (Loading area) for timed collections and returning the empty bins to their units. No deposit bins in corridors, stairwells. A second operators lift for transfer is preferred.
Option 2- Agree a layout for deposit bins within each business unit, these can be transferred to a centralised bin store when full and empty bins returned to position. The centralised waste is compacted and then presented in bulk for collection with an EA approved collection provider. The centralised bin store must have separate containment and labelling for hazardous wastes deposit.
Any rejected wastes (contaminated batches of recyclables) are returned to the centralised bin store and need to be sorted or wrong items removed before the next collection.
Option 3- to minimise unnecessary wastes and eliminate refuse, would be to apply resources to segregate wastes within an EA licensed sorting activity or room. (some major retailers opt for this to meet CSR targets and CE ambitions). Here compaction, bailing, reuse and recycling is optimally managed lowering costs overall) this requires a strategic plan to reach net zero or to achieve 75% of your weight ratio as either recycled or repurposed.

Waterman response: *We are not clear from your response whether LBC is expecting all 3 of the options you outline to be enabled. We can confirm the proposed strategy most closely aligns with "option 2" which is discussed in more detail below. It is not feasible to enable all 3 of the options.*

It is not the intention to have bulk waste containers (Eurobins or wheelie bins) or bin stores in each or any of the units at ground floor or up on the office floors. The proposed strategy includes the use of wheeled bin press in the loading bay – which will require bagged waste or loose waste (residual or recyclable, not food waste) to be placed in the bins, compacted, further waste added etc. There will be no facility to tip waste from one bulk bin to another. Each tenant will have waste receptacles in their unit / office space relevant to their activities with bagged waste transferred to the loading bay by cleaning or other tenant staff for weighing and deposit in bulk bins / wheelie bins. An exception to this may be for food & beverage tenants who if they wish could hold wheelie bins for food waste in their units for exchange with empties in the loading bay given the nature of that waste stream not lending itself to movement by bags. They could also choose to use 23 litre caddies or other lidded containers for transport.

All options require a communications plan or advisory, poster holds and shared digital information and packs for tenants and public use.

Waterman comment: *this is understood and will be the responsibility of the building operator to develop, implement, monitor and continuously encourage adherence to.*

All bins will need to be washed down quarterly, this usually occurs within the bin store by FM or via an external hire company, space will need to be designated for this activity.

Waterman comment: *this is understood. The loading bay will have the relevant water supplies and drainage should the building operator elect to maintain the bins itself, or if a contractor attends.*

There is no exact science to the actual volumes created, generally those with mixed plastics waste have more volume . You will also need to look at the facilitation for reusable items, bulky waste items. Where possible repair or fix items within the and demise 'repair it temporary spaces. We can work on the premise of 2 or more types of segregated recycling will be generated per unit, however these may differ. Confidential paper waste, mixed recyclables and food apply to office environments.

I need a list of all identified waste types and assumed volumes in total litre converted to bins. You can decide the preferred frequency of collection based on this assumption, weekly is preferred, however you can have twice a day if required. The guidance is to minimise the total number of trips ideally.

Waterman comment: *there are no specific named tenants at this time from which to establish the waste types and quantities they anticipate from their preferred modes of operation e.g. paper free office. Therefore*

we have used generic parameters to calculate the storage capacity proposed. On that basis we have allowed for two-days worth of storage for all uses (office on upper floors and a worst case approach to waste volumes from the range of ground floor uses being considered – affordable workspace, retail and food & beverage) with the weekly waste volumes assumed to arise over five days. Therefore the storage proposed is 40% of estimated weekly waste arisings. Daily collection is assumed Monday – Friday and with the building operator managing the waste removal contracts, vehicle trips will be minimised (i.e. only one collector of each waste stream). The additional storage capacity is to provide contingency primarily for missed collections. At this time, the floor areas are to be confirmed and therefore we are not in a position to provide the calculations requested. They will be included in the operational waste management strategy that will accompany the planning application. Bulky waste may arise during fit out or refurbishment activities as part of tenant change over and it will the responsibility of the contractor doing the works to apply the waste hierarchy when making decisions on what happens with the waste it will be responsible for despatching from the site. Bulky wastes are not expected to arise routinely.

The strategy proposed is a traditional bin based approach which is inherently flexible. The allocation for mixed dry recyclable waste can be distributed across mixed recyclables, and / or paper / card, and / or confidential paper, and so on. Food waste from the office accommodation has been anticipated. As well as from any food & beverage use on ground floor. When the deposit return scheme is implemented and should a food & beverage tenant be required to, or wish to, host a deposit location, they would be expected to make space for it in their unit, and would be able to store the returns in a designated bin or other container in the loading bay if the returned packaging needs to be managed separately from other recyclable wastes.

Regarding front loading arrangements, I did not attend or receive notes on this meeting. We would not advise that vehicles for waste reverse further than 15M for public road safety. We can review the final arrangement together in more detail if there are specific constraints. Your servicing arrangements would offer greater choice if accessed by a RCV vehicle above 7.5 tonnes. If this is not possible 7.5T vehicles will be sufficient but trips will increase.

‘’Access to the loading bay remains on Stacey Street, accessed from New Compton Street. Large vehicles will need to reverse into the proposed vehicle loading bays. Vehicle access for servicing has been separately discussed with LBC Highways team and whilst it is understood that team prefer entry into the loading bay using a forward gear, no objections were raised during the preapplication discussions held Friday 17 May 2024.’’

Waterman comment: *vehicles will reverse approximately one vehicle length to access the loading bay in reverse gear. Waste collection vehicles are anticipated to be crewed by more than just a driver and therefore it is expected that one of the crew will act as banksperson. This expectation will be clearly communicated by the building operator to the waste collection provider(s).*

For the retail units that are food and drink producing you will need to accommodate the Deposit Return Scheme which is being introduced nationally.

Waterman comment: *addressed above.*

Please update if there are any public private entrances expected to have higher footfall. If so you need to install litter management to include cleansing. If there are any planned outdoor spaces, roof top or open spaces, if so a fly litter capture arrangement is required.

Waterman comment: *Your comment has been relayed to the team and will be addressed in the planning application.*

Kind Regards

Linda Hall-Brunton
Principal Environmental Services Officer

Telephone: +442079742292

From: Linda Hall-Brunton <Linda.Hall-Brunton@camden.gov.uk>
Sent: Tuesday, October 8, 2024 11:59 AM
To: Shahida Sanessie <Shahida.Sanessie@camden.gov.uk>; Linda Hall-Brunton <Linda.Hall-Brunton@camden.gov.uk>
Subject: FW: 125 Shaftsbury Avenue - request for waste management pre-app consultation

Linda Hall-Brunton
Principal Environmental Services Officer

Telephone: +442079742292

From: Sarah Owen <sarah.owen@watermangroup.com>
Sent: Thursday, September 26, 2024 12:46 PM
To: Linda Hall-Brunton <Linda.Hall-Brunton@camden.gov.uk>
Cc: Vincent Lasseaux <vincent.lasseaux@watermangroup.com>; David Fowler <David.Fowler@camden.gov.uk>; Aga Szedzianis <ASzedzianis@dsdha.co.uk>; Natalie Davies <ndavies@geraldeve.com>; barry.cho@veretec.co.uk; Zivile Volbikaite <Zivile.Volbikaite@camden.gov.uk>; KFong@geraldeve.com; Anna Gargan <AGargan@geraldeve.com>
Subject: 125 Shaftsbury Avenue - request for waste management pre-app consultation

Dear Linda

Please find attached a short note on the operational waste management strategy for the proposed scheme. The key difference (and benefit) over the existing situation is that off-street collection of waste is proposed.

I look forward to any questions or comments you may have.

Kind regards

Sarah

Sarah Owen
Senior Associate
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C. Waste Storage Capacity Calculations

Table B1: Assessment of waste arisings from flexible ground floor unit uses (three units)
(Note: uncompacted wastes)

NIA (sq m)	Calculation method	No. of staff	Weekly waste arisings (litres)	Residual waste (litres per week)	1,100 litre bins daily collection		Recyclable waste (litres per week)	1,280 litre bins daily collection		Food waste (litres per week)	240 litre bins daily collection	
					No.	round up		No.	round up		No.	round up
Retail				**25% of total**			**75% of total**			**N/A**		
464.20	volume arising per sq.m [10 l] x floor space (British Standard)	N/A	**4,642.00**	1,160.50	0.42	1.00	3,481.50	1.09	2.00			
Food & Beverage				**30% of total**			**40% of total**			**30% of total**		
464.20	3,500 l per 1,000sqm (City of Westminster)	N/A	**1,624.70**	487.41	0.18	1.00	649.88	0.20	1.00	487.41	0.81	1.00

Table B2: Waste storage capacity requirements

Assumes wastes from all uses stored in shared bins

Daily collection (Monday to Friday)

Capacity for two-days worth of compacted wastes (residual and recyclable waste)

Two wheeled bin presses available – residual waste compacted 3:1, recyclable waste compacted 2:1

NIA (sq m)	Calculation method	No. of staff	Weekly waste arisings (litres)	Residual waste (litres per week)	1,100 litre bins daily collection		Recyclable waste (litres per week)	1,280 litre bins daily collection		Food waste (litres per week)	240 litre bins daily collection	
					No.	rounded		No.	rounded		No.	rounded
Office use				**15% of total**			**75% of total**			**10% of total**		
22,272	volume arising per employee [50 l] x number of employees (British Standard)	1781.78	89,088.80	13,363.32	4.86	5	66,816.60	20.88	21	8908.88	14.85	15
Retail use (worst case waste for GF units)				**25% of total**			**75% of total**			**N/A**		
464	volume arising per sq.m [10 l] x floor space (British Standard)	N/A	4,642.00	1,160.50	0.42	1	3,481.50	1.09	2			
F&B allowance for food waste										**30% of total**		
464	3,500 l per 1,000 sqm. Of which 30% food waste. City of Westminster.	N/A	1,624.70							487.41	0.81	1
Two-days worth uncompacted wastes, held in shared bins				14,523.82	5.28	6	70,298.10	21.97	22	9,396.29	15.66	16
Compacted wastes, held in shared bins					1.76	2		10.98	11			
Hold days-worth of compacted bins in loading bay					0.88	1		5.49	6			
Balance of compacted bins in the basement						1			5			
All food waste bins in loading bay												16

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