REPORT

# 7abc Bayham Street Hotel and Co-Working Office Space

## Waste Strategy Report

Client: Camden Lifestyle (UK) Limited

Reference: I&BPB7760R010DF2

Revision: F1/Draft

Date: 24 July 2018

Royal HaskoningDHV

*Enhancing Society Together*

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Royal HaskoningDHV

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# 1 Introduction

This Waste Assessment Report accompanies a full planning application for the construction of a Hotel and Office Working Space building at 7ABC Bayham Street, London. The application is submitted by Camden Lifestyle (UK) Limited, ('The Applicant').

This Waste Assessment Report has been prepared by Royal HaskoningDHV on behalf of the Applicant.

This report assesses the impacts of the Proposed Development in terms of waste generation during the construction and occupation phases, considering the proposed options for recycling, recovery or disposal of waste, and the capability of the existing local or regional waste management facilities to manage the waste. Service access requirements are provided in the Transport Statement.

This report is structured as follows:

- Section 2 Waste Planning Policy Context.
- Section 3 Methodology Criteria.
- Section 4 Description of Baseline Conditions.
- Section 5 Waste Composition and Quantities.
- Section 6 Occupation Waste Management.
- Section 7 Conclusion.

A Site Waste Management Plan is being prepared to accompany this report.

## 1.1 Background

The detailed planning application seeks planning permission for the following development ('the Proposed Development'):

*"Full Planning Application for the demolition of existing buildings (B1a Use Class) and erection of a part 3, part 4, part 5 storey building (with two basement levels), comprising co-working office floorspace (B1a Use Class), hotel accommodation (C1 Use Class) and an ancillary café/bar and fitness facilities; works to the existing access and associated works"*

The site currently comprises office buildings and a small car park with limited decorative vegetation. The surrounding area is characterised by a mix of commercial and residential uses. The site is within Camden Town Conservation Area. Historically, the site has had works from circa 1962 to the mid 1990s.

# 2 Waste Planning Policy Context

## 2.1 National Planning and Policy

### 2.1.1 National Planning Policy Framework

The National Planning Policy Framework[1] (NPPF), which was published on 27 March 2012, does not contain specific waste policies. Paragraph 5 indicates that waste policy will be set out in the National Waste Management Plan for England (2013). In terms of achieving sustainable development, the NPPF identifies that minimising waste and pollution is a fundamental part of the environmental role of the planning system.

The NPPF encourages Planning Authorities to prepare Local Plans that, so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously. The proposed development should therefore have regard to the requirements of the relevant Local Plan in terms of waste management. This is discussed further below (see section 2.2).

### 2.1.2 National Planning Policy for Waste 2014

The Government has published the National Waste Planning Policy[2] for England as a replacement of Planning Policy Statement 10 (Planning for Sustainable Waste Management – 2011)[3]: The updated policy maintains the core principles of the 'plan led' approach, with a continued focus of moving waste up the waste hierarchy.

It requires local planning authorities to have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management. Increasingly local authorities are working together in partnerships to deliver full and efficient waste services; a requirement of the duty to cooperate in section 110 of the Localism Act 2011. The document sets out detailed waste planning policies to facilitate a more sustainable and efficient approach to resource use and management, for example by ensuring the design and layout of new infrastructure complements sustainable waste management.

When determining planning applications for non-waste development, the Policy requires that local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- The likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;
- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development; and
- The handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal.

[1] *Department for Communities and Local Government (2012) National Planning Policy Framework, DCLG, London*
[2] *DCLG, 2014, National Planning Policy for Waste, The National Archives, London*
[3] *DCLG, 2011, Planning Policy Statement 10: Planning for Sustainable Waste Management, London: TSO*

### 2.1.3 Government Review of Waste Policy in England 2011

Defra conducted a review of the existing national waste policy in 2011 to set a direction towards a 'Zero Waste Economy'[4].

The principle commitments from the policy review that are relevant to this development include:

- Continued assessment of progress against a number of EU targets; focussing action in specific areas, including recovering at least 70% of construction and demolition waste by 2020;
- A greater focus on waste reduction at the earlier, design stages of construction projects as this is where the largest environmental and financial savings can be made. This would be part of a wider, ongoing programme of work with the industry including support for the Sustainable Construction Task Group Action Plan; and
- A review of the SWMP Regulations 2008, examining how effective the regulations have been in reducing costs for businesses, embedding resource efficiency and reducing the fly tipping of construction waste.

Note: The SWMP Regulations 2008 were revoked by the UK Government in December 2013 as part of an initiative to reduce red tape, meaning that SWMPs are no longer a legal requirement in England for all construction projects. However, despite this change SWMPs are considered the standard practice on construction and demolition sites as they facilitate compliance with the Waste Hierarchy and are also required as part of Camden's supplementary planning documents (see section 2.2.1 below).

### 2.1.4 National Waste Management Plan for England 2013

Defra published a National Waste Management Plan[5] England in July 2013. The key aim of the Waste Management Plan for England was to set a direction towards a zero-waste economy as part of the transition to a sustainable economy. In particular, this means using the "waste hierarchy" (waste prevention, re-use, recycling, recovery and finally disposal as a last option) as a guide to sustainable waste management.

The Waste Management Plan for England was a high-level document which is non–site specific. It evaluated how it would support implementation of the objectives and provisions of the revised Waste Framework Directive[6] (rWFD).

The rWFD established the principle of 'proximity'. This is within the context of the requirement on Member States to establish an integrated and adequate network of waste disposal facilities for recovery of mixed municipal waste collected from private households. The requirement included where such collection also covers waste from other producers.

The plan identified the measures to be taken to ensure that by 2020 at least 70% by weight of construction and demolition waste is subjected to material recovery.

Note: The construction, demolition and excavation sector is the largest contributing sector to the total waste generation. The UK generated 202.8 million tonnes of total waste in 2014[7]. More than half of this

[4] Government Review of Waste Policy in England 2011, available at URL: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf
[5] *Defra, 2013, 'National Waste Management Plan for England 2013', Defra: London*
[6] *Waste Framework Directive (2008/98/EC)*
[7] *https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/683051/UK_Statisticson_Waste_statistical_notice_Feb_2018_FINAL.pdf*

(59 per cent) was generated by Construction and Demolition activities. The Government keeps progress towards the 2020 targets under review by monitoring actual recycling rates and by modelling future recycling. The recovery rate from non-hazardous construction and demolition waste in the UK in 2014[8] was 89.9 per cent. This already exceeds the 2020 target of recovering at least 70% by weight, of non-hazardous construction and demolition waste.

### 2.1.5 Waste Prevention Programme for England 2013

The Government developed Waste Prevention Programme[9] for England in 2013 to set out the key roles and actions which should be taken to move towards a more resource efficient economy. As well as describing the actions the government is taking to support this move, it also highlights actions businesses, the wider public sector, the civil society and consumers can take to benefit from preventing waste. Using resources more efficiently, designing and manufacturing products for optimum life and repairing and reusing more items could save money and provide opportunities for economic growth at the same time as improving the environment.

The waste prevention programme is a requirement of the rWFD.

The Waste Prevention Programme sets out detailed actions to:

- Encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services;
- Encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others;
- Help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth; and
- Support action by central and local government, businesses and civil society to capitalise on these opportunities.

To measure progress against the aim of the programme, the government measures changes in overall waste arising, assesses the environmental impacts of this waste and considers how these factors relate to changes in the resource efficiency of the economy.

### 2.1.6 BS 5906:2005 - The British Standard on Waste Management in Buildings

BS 5906[10] is a code of practice for methods of storage, collection, segregation for recycling and recovery, and on-site treatment of waste from residential and non-residential buildings. BS 5906 applies to new buildings, refurbishments and conversions of residential and non-residential buildings, including, but not limited to, retail and offices.

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[8] *https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/683051/UK_Statisticson_Waste_statistical_notice_Feb_2018_FINAL.pdf*

[9] *Defra, December 2013 'Prevention is better than cure - The role of waste prevention in moving to a more resource efficient economy', HM Government, London (https://www.gov.uk/government/publications/waste-prevention-programme-for-england)*

[10] *British Standards Institution, 2005, BS 5906:2005 Waste management in buildings. Code of practice, BSi, London*

## 2.2 Local and Regional Planning Policy

### 2.2.1 Camden Local Plan (2017)

Camden's Local Plan as adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. The Camden Local Plan sets out the Council's planning policies and covers the period from 2016-2031. The Camden Local Plan is in general conformity with the London Plan. One of the strategic objectives of the plan is: "*to reduce, plan for and manage Camden's waste, including by working with our partner boroughs in the North London Waste Authority area, to work towards self-sufficiency in London*".

The Plan highlights resource efficiency and promotes retrofitting or altering buildings before proposing demolition to reduce large quantities of waste and carbon emissions. However, for proposals with substantial demolition and reconstruction, this should be justified in terms of the optimisation of resources and energy use, in comparison to the existing building. Where demolition cannot be avoided, it is expected that at least 85% of waste will be diverted from landfill and with comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their re-use off-site. Construction materials and processes should also have a low embodied carbon content. Resource efficiency should be optimised by:

- reducing waste;
- reducing energy and water use during construction;
- minimising materials required;
- using materials with low embodied carbon content; and
- enabling low energy and water demands once the building is in use.

Policy CC5 on waste aims to make Camden a low waste borough with the following aims:

- 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;
- 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;
- 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
- make sure that developments include facilities for the storage and collection of waste and recycling.

The council supports the objectives of sustainable waste management to move the management of waste up the 'waste hierarchy'.

#### Camden Planning Guidance

Camden has prepared Planning Guidance to support the policies in their Local Plan. These guidance documents form a Supplementary Planning Document (SPD) which are an additional "material consideration" in planning decisions. Two documents are specifically relevant to the management of waste form the proposed development:
CPG1 – Design; and
CPG3 – Sustainability.

The Council originally adopted these guides in April 2011 and they were updated in 2013, 2015 and recently in March 2018.

**CPG1 – Design**

The CPG1 amendment in 2015 is relevant to the proposed development, and this report, because it provided amended guidance for recycling and waste storage.

This guidance supports the following Local Development Framework policies:

- CS18 Dealing with our waste and encouraging recycling;
- DP26 – Managing the impact of development on occupiers and neighbours; and
- DP22 – promoting sustainable design and construction.

It applies to residential developments, and non-residential or commercial dwellings. Guidance on construction and demolition waste is not covered by this guide, which are covered in. CPG1 has a focus on the occupation phase of the development.

This guidance also relates to the British Standard BS5906-2005 – Waste management in buildings – Code of practice.

CPG1 identifies that good design should: incorporate external facilities such as waste storage facilities into the design of the development. The key message is to ensure that in planning for waste recycling and storage developments should accommodate:

- adequate space (designed) for the storage of waste and recyclables and waste;
- containers should have designated storage areas that are in a safe location, which is accessible for all users and collectors and minimise nuisance to occupiers and neighbours (and their amenity space) e.g. noise, obstruction, odours, pests, etc;
- recycling and refuse collection for any waste contractor (and allow for reasonable changes to collection services in the future); and
- sensitively designed/located, especially in conservation areas/or listed buildings.

Special consideration must be given to the location and nature of external storage areas for restaurants and food waste. The waste generally high has a high biodegradable content, therefore can potentially cause nuisance from odour, visual blight, and through attraction of vermin and scavengers.

Applicants must provide details of storage for waste and recyclables in a proposed development as part of their application. These should be shown on the plans or in the application documents, where possible, and will form part of the approval.

Information on the amount of space needed for sorting and storage of waste on-site prior to collection is given in the Waste recycling and storage section of CPG1. The Council does not generally allow waste to be left on the highway for collection on a specified day except in the case of residential development of six dwellings or less.

**CPG3 Sustainability**

This document covers the sustainable use of materials, which will be relevant to the management of waste during the construction of the proposed development. The quantity of any waste that cannot be avoided by retaining the whole or part of a building must be managed in accordance with the waste hierarchy.

In line with the waste hierarchy, during the construction phase, The Council's preferred approach is:

- the use of reclaimed materials;
- the use of materials with higher levels of recycled content; and
- the use of new materials.

The Council also expects that at least 10% of the total value of materials used to be derived from recycled and reused sources. Major developments are anticipated to be able to achieve 15-20% of the total value of materials used to be derived from recycled and reused sources.

CPG3 requires that a site waste management plan (SWMP) is prepared and should be submitted to and approved by the Council prior to commencement of works on site. The Construction Management Plan for the proposed development will have to reflect that space will be required to sort, store and perhaps crush/recycle materials as part of the SWMP. Where demolition of a building is to take place a pre-demolition audit of materials should be completed by a qualified professional and submitted with an application, in accordance with the Demolition Protocol (Demolition Protocol (2003), Institute of Civil Engineers (ICE)).

A SWMP is being prepared to accompany this Waste Strategy report.

### 2.2.2 North London Waste Plan

Currently, seven North London boroughs, including Camden, are preparing a joint planning document the North London Waste Plan (NLWP), which will form part of the borough Local Plans. Once adapted, the NLMP will form part of the overarching planning framework and include policies and guidelines used for the determination of planning applications relating to proposed or existing waste facilities in North London until 2032.

The aim of the NLWP is to work towards achieving net self-sufficiency in the management of North London's waste and support a greener London by providing a planning framework that contributes to an integrated approach to management of materials further up the waste hierarchy.

Whilst the NLWP has a focus on waste development, the proposed development will generate waste that will need to be managed by North London's waste facilities, during both construction and operation. Therefore, the aims and objectives of the NLWP are relevant to the proposed development, with a particular focus on contributing to the conservation of resources by improving the efficiency of processing and making better use of the wastes created within North London.

Consultation started on the draft plan in 2015. The programme for the Boroughs to publish the NLWP for further consultation has been delayed. This is to enable the Boroughs to consider the proposed Crossrail 2 scheme whose route down the Lee Valley has potential implications for existing and proposed waste sites.

### 2.2.3 North London Joint Waste Strategy (2009)

The North London Waste Authority (NLWA) and the seven boroughs have prepared a Joint Waste Strategy which plans for managing waste collected by the boroughs until 2020. In order to comply with the waste framework directive (section 2.3.1) the waste hierarchy has been employed in the development of this strategy. The region should be self-sufficient, with waste dealt with in the region where it arises. This has been set in the London Plan at a target of 85% of London's waste managed in London by 2020. The proximity principle should be taken into account where waste is treated as close to the point of generation as possible. The polluter pays principle should be adhered to where the cost of disposing of waste should be borne by the party generating that waste. The aims and objectives of the Strategy are as follows:

Aims:

- To promote and implement sustainable municipal wastes management policies in North London

- To minimise the overall environmental impacts of wastes management
- To engage residents, community groups, local business and any other interested parties in the development and implementation of the above policies
- To provide customer-focused, best value services

Objectives:

- To minimise the amount of municipal wastes arising
- To maximise recycling and composting rates
- To reduce greenhouse gases by disposing of less organic waste in landfill sites
- To co-ordinate and continuously improve municipal wastes minimisation and management policies in North London
- To manage municipal wastes in the most environmentally benign and economically efficient ways possible through the provision and co-ordination of appropriate wastes management facilities and services
- To ensure that services and information are fully accessible to all members of the community.

### 2.2.4 The Mayor's London Plan (2016)

The London Plan is a spatial development strategy in which the borough local development documents should be 'in general conformity'. The plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. However, the plan only sets out policies for waste management developments.

## 2.3 Waste Legislation

### 2.3.1 Waste Framework Directive

The key European legislation is the revised Waste Framework Directive (2008/98/EC) ('rWFD'), which consolidates several separate waste Directives and amendments. It establishes the basis for the management of wastes across the European Union (EU). It defines certain terms, such as "waste", "recovery" and "disposal", to ensure that a uniform approach is taken across the EU.

### 2.3.2 Duty of Care

The waste duty of care is a legal requirement, originally implemented by Section 34 of the Environmental Protection Act 1990, to ensure that producers and holders handle their waste safely and in compliance with the appropriate regulations. One of the fundamental aspects of duty of care requires the holder of waste to make sure that anyone else dealing with their waste has the necessary authorisation to do so. If the holder does not do this and their waste is subsequently found to have been illegally disposed, the holder could be held responsible and may face prosecution.

The provisions for the Waste duty of care are implemented in the Waste (England & Wales) Regulations 2011 SI 2011 (No. 988).

### 2.3.3 The Waste Hierarchy

The waste hierarchy is set out at Article 4 of the rWFD and has been implemented by The Waste (England and Wales) Regulations 2011.

The waste hierarchy is set out at Article 4 of the rWFD. The waste hierarchy requires the producer/holder of a waste to demonstrate that the priorities identified in

**Table *1*** have been considered in the priority order, to determine the most suitable waste management option for all wastes prior to removal from site.

**Table 1: The Waste Hierarchy**

| Waste Hierarchy | Relevant activity |
|---|---|
| Prevention | Using less material in design and manufacture, keeping products for longer, re-use, using less hazardous materials. |
| Preparing for re-use | Checking, cleaning, repairing, refurbishing, whole items or spare parts. |
| Recycling | Turning waste into a new substance or product, includes composting if it meets quality protocols |
| Other recovery | Includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste, some backfilling. |
| Disposal | Landfill and incineration without energy recovery. |

*Table reproduced from Defra website:* https://www.gov.uk/waste-legislation-and-regulations

It is a legal requirement for waste producers/holders to follow the waste hierarchy when making decisions about waste management options. Waste holders must demonstrate the highest possible hierarchical option for their wastes. Lower hierarchical options cannot be justified by cost alone. They require environmental justification over available higher options, for example the location of a site may justify sending waste to a lower hierarchical option (e.g. local landfill), rather than sending it hundreds of miles to the nearest facility that could provide a higher option.

### 2.3.4 Hazardous Waste

The Hazardous Waste Regulations (HWR) provide the rules for assessing if a waste is hazardous or not. As part of the assessment of waste, the HWR refer to the List of Wastes (which is often referred to as the European Waste Catalogue (EWC)) for the relevant thresholds for some of the hazardous properties; and to assign the formal description and code for the waste. The regulatory framework to do this is contained in:

- Hazardous Waste (England and Wales) Regulations 2005 SI 894.
- Hazardous Waste (England and Wales) (Amendment) Regulations 2009 SI 507.
- List of Wastes (England) Regulations 2005 SI 895.
- List of Wastes (England) (Amendment) Regulations 2005 SI 1673.
- The Hazardous Waste (Miscellaneous Amendments) Regulations 2015 SI 1360

Detailed technical guidance on the hazardous waste assessment process is provided by 'Waste Classification and Assessment (Technical Guidance WM3)[11]' issued in July 2015.

This document[12] is jointly approved by all the UK environmental regulators. It provides thresholds and criteria for assessing each of the 15 hazardous properties and Persistent Organic Pollutants (POPs).

### 2.3.5 Separate Collection of Waste

The rWFD (Article 10) requires that "*Member States shall take the necessary measures to ensure that waste undergoes recovery in accordance with Articles 4 and 13 [paragraph 1*]…" and "*Where necessary to*

[11] *https://www.gov.uk/government/publications/waste-classification-technical-guidance*
[12] *Note: WM3 will be updated in July 2018 to accommodate forthcoming changes to the assessment of the 'ecotoxic HP14' hazardous property.*

*comply with paragraph 1 and to facilitate or improve recovery, waste shall be collected separately if technically, environmentally and economically practicable and shall not be mixed with other waste or other material with different properties*".

This has given rise to the term 'TEEP' 'Technically, Environmentally and Economically Practicable' with reference to the separate collection of wastes destined for recovery operations. TEEP applies to all commercial (business) and municipal (household) waste. However, only paper, metal, plastic and glass have been explicitly named in the rWFD as specific waste streams that are required to be collected as separate fractions – and only if this is necessary to improve recycling quality and quantity. This requirement applies from January 2015 and was implemented by the Waste (England and Wales) (Amendment) Regulations 2012.

Municipal solid wastes are collected for recovery, either as source segregated waste streams; or as co-mingled wastes. Waste Collection Authorities have a duty to separately collect the four types of recyclable material, and must apply the "TEEP" tests to determine if this is needed in their circumstances. The requirements of 'TEEP' do not make it mandatory that separate collection has to be introduced; and co-mingled collection is acceptable if the aim of high quality recycling can be achieved just as well with a form of co-mingled collection. Decisions about whether co-mingled collections are justifiable need to be taken locally, based on the particular circumstances in each area. Advice in this regard has been provided by WRAP in the Waste Regulations Route Map[13].

### 2.3.6 Household Waste, Industrial Waste or Commercial Waste

The Controlled Waste Regulations 2012 describes wastes that are to be treated as household waste, industrial waste or commercial waste because of the place where it is produced; or because of its nature or the activity which produces it (notwithstanding the place where it is produced).

### 2.3.7 Animal By-Products Regulations 2005

If food waste or former foodstuffs are of animal origin or contain products of animal origin, the producer must dispose of them in a way that doesn't pose a risk to human or animal health. Where foods of animal origin are no longer intended or are not fit for human consumption, the foodstuff becomes an animal by-product (ABP).

Any waste food (including used cooking oil) that comes from restaurants, catering sites, commercial or household kitchens is defined as catering waste. Catering waste is a category 3 ABP.

The Regulations stipulate how catering waste and former foodstuffs can be disposed; and how catering waste must be kept separate from medium or high risk former foodstuffs (for example, raw meat and fish).

[13] *http://www.wrap.org.uk/content/requirements-waste-regulations*

# 3 Methodology Criteria

## 3.1 Methodology Approach

The report considers the likely quantity and composition of waste materials predicted to be generated during the construction phase and during occupation. On-site re-use and recovery of the waste in the development are explored, along with the capability for existing local and regional waste management infrastructure to manage the arisings according to the principles of the waste hierarchy.

The assessment tools and criteria were derived for this report based on professional judgement and guidelines derived from national and local planning policy relating to waste management and the waste hierarchy.

## 3.2 Assumptions and Limitations

The Site footprint is approximately 0.07 hectares. The total gross internal area covering all six levels is proposed to be 530m$^2$. The total gross external area is 663m$^2$.

At this stage in the application process for the Proposed Development, it is estimated that Proposed Development would be completed between 18-24 months of starting.

Construction costs are anticipated to be approximately £12 million.

Details of demolition and construction methodology not available at the time of writing, however will be provided in a Construction Management Plan.

Site excavation material and inert construction waste will be reused on site where possible.

The overall construction period will be 18-24 months

All three of the current buildings will be demolished. Prior to the site clearance, an asbestos demolition survey will be carried out to check the presence of any notifiable asbestos or hazardous materials.

# 4 Description of Baseline Conditions

## 4.1 Existing Conditions at the Site

### 4.1.1 Site Context

The site is located on Bayham Street in Camden. Bayham Street mainly consists of residential buildings including Georgian terrace with one shop and opposite the site there is a 1960's high rise social housing development, there are also tall buildings adjacent to the site. The street is a one-way street with high traffic density and a bus route. The character of the area is mixed but is categorised as commercial by the Conservation Area Appraisal "Sub Area 1 ('Commercial')".

The surrounding area includes Camden High Street with shops and restaurants and the KOKO music venue and is characterised by a mix of commercial and residential uses. The site is approximately 100m northeast of Mornington Crescent underground station, 400m south of Camden underground station and 900m north of both Euston and King's Cross/St Pancras National Rail stations.

Camden Market is a 10 minute walk away from the site. The development site sits on the boundary of Camden Town Conservation Area. The surrounding streets are very busy with vehicular and pedestrian traffic.

## 4.2 Site Details

The Site comprises of office space including Fulwell73, JFH Law and Casna Group Ltd at 7a, b and c respectively and the lawful planning use of these buildings is Offices (Class B1a). There is a small gated car park at the centre of the offices. There are some decorative plants such as Buddlea spp and palm.

The Site can be accessed directly from Bayham Street at the front, Bayham Street connects to Crowndale Road which then flows onto Camden High Street.

The development proposal comprises:

*"Full Planning Application for the demolition of existing buildings (B1a Use Class) and erection of a part 3, part 4, part 5 storey building (with two basement levels), comprising co-working office floorspace (B1a Use Class), hotel accommodation (C1 Use Class) and an ancillary café/bar and fitness facilities; works to the existing access and associated works"*

The red line boundary for the site is presented in **Figure 1** below:


*Figure 1 Red Line Boundary*

## 4.3 Proposed Development

The Proposed Development is a five-storey building, comprising a lower basement fitness suite and conference and meeting rooms, basement offices and co-working office floorspace, ground floor café/ bar, admin offices and hotel and co-working lounge space and hotel accommodation on the upper four floors. The roof is planned to be a planted roof. There will be a core lift and stair serving all floors for access to the office and hotel facilities. There will be a courtyard with a staircase to the basement office space which will allow circulation and light to the basement.

## 4.4 Waste Management Facilities in the Local Area

Local waste management facilities were identified from the Environment Agency Public Register[14]. The search radius was limited to 10km of the Site (based on postcode NW1 0EY).

The list of facilities on the Public Register includes all waste management facilities that hold an existing permit within a 10km radius. This would include facilities that are not likely to receive waste from the Proposed Development, e.g. vehicle dismantling facilities, Household Waste Recycling Centres (HWRC), etc.

[14] *Environment Agency Public Register, accessed on 06/06/2018*

The waste management facilities that could receive waste from the Proposed Development are shown as a Table in **Appendix 1**. Waste Management facilities on the Public Register that are not likely to receive waste from the construction phase or the completed development were not included in the table.

## 4.5 Regional Waste Management Facilities

The potential regional waste management capacity was assessed. The Environment Agency publishes waste capacity data on the .gov website[15]. This data set was assessed to identify the remaining regional capacity according to waste management options in London. This provides an indication of whether the predicted waste types from the Proposed Development can be managed within the Region in accordance with the proximity principle (i.e. managing wastes as close to the source of production as possible).

The rWFD (Article 16) establishes the principle of proximity for managing waste as close to the source of production. The Proximity Principle recognises that transporting waste has environmental, social and economic costs so, as a general rule, waste should be dealt with as near to the place of production as possible.

The data in **Tables 2** to **7** inclusive provides an indication of the widespread availability of a range of types of waste management facilities within London. Note that the facilities identified in **Appendix 1** would also be included within the summarised data below. There are too many regional sites to list individually.

**Table 2: Number of Waste Management Facilities in London (2016)**

**England: Permitted waste facilities in 2016**

| Site type | | Former Planning Region | | | | | | | | ENGLAND |
|---|---|---|---|---|---|---|---|---|---|---|
| | | North East | North West | Yorkshire & the Humber | East Midlands | West Midlands | East of England | London | South East | South West | |
| Landfill | Number of sites with an environmental permit at end 2016 | 26 | 48 | 71 | 61 | 50 | 90 | 8 | 94 | 59 | **507** |
| | Number of sites that accepted waste in 2016 | 27 | 35 | 48 | 46 | 38 | 52 | 5 | 55 | 34 | **340** |
| Land Disposal | Number of sites with an environmental permit at end 2016 | 8 | 34 | 36 | 26 | 22 | 54 | 10 | 63 | 64 | **317** |
| | Number of sites that accepted waste in 2016 | 5 | 24 | 26 | 11 | 10 | 29 | 9 | 41 | 57 | **212** |
| Incineration | Number of sites with an environmental permit at end 2016 | 10 | 16 | 17 | 16 | 20 | 14 | 11 | 27 | 15 | **146** |
| | Number of sites that accepted waste in 2016 | 4 | 8 | 9 | 7 | 14 | 6 | 7 | 17 | 9 | **81** |
| Transfer | Number of sites with an environmental permit at end 2016 | 181 | 428 | 398 | 279 | 371 | 366 | 211 | 405 | 348 | **2,987** |
| | Number of sites that accepted waste in 2016 | 137 | 321 | 293 | 216 | 279 | 295 | 164 | 334 | 301 | **2,340** |
| Treatment | Number of sites with an environmental permit at end 2016 | 145 | 423 | 364 | 283 | 332 | 361 | 137 | 394 | 343 | **2,782** |
| | Number of sites that accepted waste in 2016 | 103 | 290 | 284 | 225 | 235 | 271 | 103 | 309 | 255 | **2,075** |
| Metal Recovery | Number of sites with an environmental permit at end 2016 | 155 | 389 | 408 | 235 | 375 | 294 | 101 | 202 | 261 | **2,420** |
| | Number of sites that accepted waste in 2016 | 71 | 181 | 210 | 114 | 182 | 164 | 52 | 121 | 149 | **1,244** |
| Use of Waste | Number of sites with an environmental permit at end 2016 | 7 | 24 | 18 | 16 | 19 | 16 | 3 | 18 | 54 | **175** |
| | Number of sites that accepted waste in 2016 | 3 | 15 | 7 | 8 | 7 | 7 | 1 | 6 | 36 | **90** |
| **Total** | **Number of sites with an environmental permit at end 2016** | **532** | **1,362** | **1,312** | **916** | **1,189** | **1,195** | **481** | **1,203** | **1,144** | **9,334** |
| | **Number of sites that accepted waste in 2016** | **350** | **874** | **877** | **627** | **765** | **824** | **341** | **883** | **841** | **6,382** |

**Table Notes:**

The number of sites that accepted waste in 2016 represents those who submitted waste returns.

**Table 3: Remaining Landfill Capacity in London (2016)**

[15] https://www.gov.uk/government/publications/waste-management-for-england-2016 *accessed 06/06/2018*

**London: Landfill capacity 2016**

All figures are provided in 000s cubic metres

| Landfill Type | Sub-Region | | | | | | | LONDON |
|---|---|---|---|---|---|---|---|---|
| | Central London | East London Waste Authority | North London Waste Authority | South East London | South London | West London Waste Authority | Western Riverside Waste Authority | |
| Hazardous Merchant | - | - | - | - | - | - | - | - |
| Hazardous Restricted | - | - | - | - | - | - | - | - |
| Non Hazardous with SNRHW cell* | - | - | - | - | - | - | - | - |
| Non Hazardous | - | 2,703 | - | - | 229 | - | - | **2,931** |
| Non Hazardous Restricted | - | - | - | - | - | - | - | - |
| Inert | - | 128 | - | - | 37 | 354 | - | **518** |
| Total | - | 2,830 | - | - | 266 | 354 | - | 3,450 |

*Some non-hazardous sites can accept some Stable Non Reactive Hazardous Wastes (SNRHW) into a dedicated cell, but this is usually a small part of the overall capacity of the site.

## Table 4: Transfer, Treatment and Metal Recycling Volumes in London (2016)

**London: Transfer, treatment and metal recycling site inputs 2016**
All figures are provided in 000s tonnes

| Site Type | Sub-Region | | | | | | | LONDON |
|---|---|---|---|---|---|---|---|---|
| | Central London | East London Waste Authority | North London Waste Authority | South East London | South London | West London Waste Authority | Western Riverside Waste Authority | |
| Hazardous waste | 0 | 220 | - | 0 | 15 | 214 | 220 | **669** |
| HIC | 165 | 1,089 | 1,538 | 423 | 659 | 1,606 | 379 | **5,860** |
| Clinical | - | 0 | 1 | 2 | 1 | 6 | 0 | **10** |
| Civic amenity site | 4 | 73 | 136 | 63 | 140 | 95 | 2 | **513** |
| Non Biodegradable | 38 | 326 | 235 | 20 | 63 | 667 | 67 | **1,416** |
| **Transfer Total** | **206** | **1,709** | **1,911** | **508** | **877** | **2,588** | **669** | **8,469** |
| Material recovery | 66 | 242 | 21 | 391 | 28 | 494 | 456 | **1,698** |
| Physical | 5 | 859 | 454 | 928 | 373 | 641 | 36 | **3,296** |
| Physico-chemical | - | 159 | - | 271 | - | 85 | - | **515** |
| Chemical | - | - | - | - | - | - | - | - |
| Composting | 4 | - | 34 | 0 | 44 | 53 | - | **135** |
| Biological | - | 538 | - | - | 45 | 100 | - | **683** |
| **Treatment Total** | **75** | **1,798** | **509** | **1,590** | **490** | **1,373** | **492** | **6,327** |
| Vehicle depollution | - | 12 | 47 | 59 | 7 | 17 | 95 | **238** |
| Metal recycling site | - | 315 | 4 | 120 | 64 | 140 | 157 | **800** |
| **Metal Recycling Sector Total** | **-** | **327** | **51** | **180** | **72** | **157** | **251** | **1,038** |

## Table 5: Incineration Capacity in London (2016)

**London: Incineration capacity 2016**
All figures provided in 000s tonnes

| Incineration Type | Sub-Region | | | | | | | LONDON |
|---|---|---|---|---|---|---|---|---|
| | Central London | East London Waste Authority | North London Waste Authority | South East London | South London | West London Waste Authority | Western Riverside Waste Authority | |
| Animal By-Product | - | - | - | - | - | - | - | - |
| Animal Carcasses | - | - | - | - | - | - | - | - |
| Clinical | - | - | 75 | - | - | 8 | - | **83** |
| Co-Incineration of Hazardous Waste | - | - | - | - | - | - | - | - |
| Co-Incineration of Non Hazardous Waste | - | - | - | - | - | - | - | - |
| Hazardous | - | - | - | - | - | - | - | - |
| Municipal and/or Industrial & Commercial | - | - | 675 | 1,273 | - | - | - | **1,948** |
| Sewage Sludge | - | 91 | - | 54 | - | - | - | **144** |
| **Total** | **-** | **91** | **750** | **1,327** | **-** | **8** | **-** | **2,175** |

Note: This data table is for operational incineration facilities that accepted waste from off-site sources. It does not include facilities that burned waste from their own in-house processes or were non/pre-operational.

### Table 6 Deposit on land for recovery inputs (2016)

**London: Deposit in landfill for recovery inputs 2016**
All figures are provided in 000s tonnes

| Site Type | Sub-Region | | | | | | | LONDON |
|---|---|---|---|---|---|---|---|---|
| | Central London | East London Waste Authority | North London Waste Authority | South East London | South London | West London Waste Authority | Western Riverside Waste Authority | |
| Deposit in landfill for recovery | - | 368 | - | - | 14 | 180 | - | 562 |
| Total | - | 368 | - | - | 14 | 180 | - | 562 |

Note: This activity is the deposit of waste in land for benefit and recovery purposes. Landfilling is the deposit in land for the purposes of final disposal.
Both activities require an environmental permit under the Environmental Permitting Regulations.

### Table 7: London - Use of Waste (2016)

**London: Use of waste inputs 2016**
All figures provided in 000s tonnes

| Site Type | Sub Region | | | | | | | LONDON |
|---|---|---|---|---|---|---|---|---|
| | Central London | East London Waste Authority | North London Waste Authority | South East London | South London | West London Waste Authority | Western Riverside Waste Authority | |
| Use of waste in construction | - | - | - | - | - | - | - | - |
| Use of waste in reclamation | - | 9 | - | - | - | - | - | 9 |
| Use of waste for timber manufacturing | - | - | - | - | - | - | - | - |
| Total | - | 9 | - | - | - | - | - | 9 |

Note: These activities are for use of waste permitted under Standard Rules Permits for waste operations.

## 4.6 Availability and capacity of regional facilities

The specific waste streams that are predicted to be generated from the Proposed Development are identified in **Sections 5** and **Section 6** below. These sections provide a discussion on the types of waste that are predicted to be generated; and whether those wastes would be recovered on site; or would be recovered or disposed off-site. Off site management would involve the use of facilities identified in **Appendix 1** and **Tables 2 – 7**.

The information shows that there are numerous waste management facilities providing a wide variety of waste management options within the local area (**Appendix 1**) and region (**Tables 2 to 7** inclusive).

The overall capacity data means that these facilities can manage most of the wastes requiring off-site management that are predicted to be generated by the Proposed Development during construction. However, if there are any hazardous wastes produced that require landfill disposal, there is no capacity available in London, so these will have to be exported out of the region.

# 5 Waste Composition and Quantities

## 5.1 Construction Waste Arisings

Waste material will be generated at all stages of the construction process. The type of development, ground conditions and on-site waste management practices will influence the composition of the waste.

The BRE (Building Research Establishment) SMART Waste data report (2013)[16] was used to estimate volumes of waste arisings from the construction phase of the proposed development. BRE produced the SMART Waste data report by assessing actual data from approximately 10,000 completed new build, refurbishment and civil engineering projects.

A detailed breakdown of the predicted composition of construction waste for the entire Proposed Development is set out in **Table 8** below. This represents waste inclusive of the estimated earthworks quantity.

The predicted waste types and volumes are derived from BRE's SMART Waste Data Report for Commercial Office Space projects according to the approximate tonnes of waste per £100,000 project value, based upon a maximum proposed project cost (£12 million). This was identified as the most relevant data set to derive the predicted arisings for the Proposed Development.

The anticipated construction programme, based on estimates at this stage of the application process, is likely to be over the course of approximately 18 to 24 months. For the purposes of assessment, the average monthly quantities were calculated to provide a general assumption about the potential maximum amount of any particular type of waste likely to be present on site at one particular time, which is based upon the shortest construction period because this represents the most conservative case. These are presented in **Table 8** below.

The data has been colour coded to identify the generic waste type: green = inert waste; yellow = non-hazardous waste; and orange = hazardous waste.

[16] *Building Research Establishment (2013) SMART Waste Data Report 2013.*

**Table 8: - Estimated Quantity of Construction Waste**

| **Waste Product (**European waste catalogue number**)** | **Average tonnes/£100K** | Proposed arisings | Proposed arisings per month |
|---|---|---|---|
| | | Tonnes | Tonnes |
| Asphalt (17 03 02) | 0.032 | 3.86 | 0.2 |
| Binders (17 01 01) | 0.011 | 1.30 | 0.1 |
| Bricks (17 01 02) | 0.643 | 77.19 | 4.3 |
| Canteen/office/adhoc waste (20 03 01) | 0.088 | 10.55 | 0.6 |
| Concrete (17 01 01) | 1.860 | 223.19 | 12.4 |
| Electrical and electronic equipment (20 01 36) | 0.004 | 0.46 | 0.0 |
| Floor coverings - soft (20 01 11) | 0.089 | 10.71 | 0.6 |
| Furniture ( 20 03 07) | 0.060 | 7.25 | 0.4 |
| Gypsum (17 08 02) | 0.374 | 44.91 | 2.5 |
| Hazardous (17 09 03*) | 0.043 | 5.14 | 0.3 |
| Inert (17 01 07) | 26.306 | 3156.76 | 175.4 |
| Insulation (17 06 04) | 0.118 | 14.12 | 0.8 |
| Liquids (16 10 02) | 0.003 | 0.33 | 0.0 |
| Metals (17 04 07) | 0.469 | 56.33 | 3.1 |
| Mixed (17 09 04) | 1.915 | 229.78 | 12.8 |
| Other | 0.387 | 46.45 | 2.6 |
| Packaging (15 01 06) | 0.217 | 26.00 | 1.4 |
| Plastics (17 02 03) | 0.127 | 15.19 | 0.8 |
| Soils (17 05 04) | 13.858 | 1662.97 | 92.4 |
| Tiles and Ceramics (17 01 03) | 0.044 | 5.32 | 0.3 |
| Timber (17 02 01) | 0.468 | 56.15 | 3.1 |
| **Total** | **47.206** | 5664.69 | 314.7 |

The estimated quantity according to the generic category of waste is summarised in **Table 9**.

**Table 9: - Summary of the Estimated Total Quantity by Waste Category**

| **Waste category** | Proposed arisings | Proposed arisings per month |
|---|---|---|
| | Tonnes | Tonnes |
| Inert | 3463.76 | 192.4 |
| Non-hazardous | 2195.79 | 122.0 |
| Hazardous | 5.14 | 0.3 |

## 5.2 Construction Waste Management Measures

### 5.2.1 Construction Phase

This section describes the measures that can be implemented to eliminate or reduce the anticipated quantity of waste sent to landfill by implementing the waste hierarchy. These measures would increase reuse; recycling or recovery opportunities, thereby reducing the effect of significant environmental impacts. The waste management measures for the construction phase are split in the section below, into those that can generally be applied to one or more waste type; and those that are applied to specific waste streams. These measures apply to the construction of the car deck, as well as the site-wide scheme.

### 5.2.2 General Waste Management Measures

There are certain principles of waste management that can be applied to most of the wastes that would be created during the construction phase. These are:

- Adhere to waste legislation for storage and handling on-site; and also ensure that the relevant regulatory controls have been applied to the reuse, recycling or recovery of waste on-site.
- No waste from the Proposed Development shall be deposited outside the boundary of the Site, unless it is at a facility that holds a valid environmental permit or suitable authorised exemption. Off-site waste management facilities are legally obliged to operate under an environmental permit (or an authorised exemption), which is in place to ensure that the site is operated in a manner to prevent emissions causing harm to human health or the environment.
- Ensure that those who remove waste from site have the appropriate authorisation (i.e. are registered waste carriers); and those facilities that receive waste from the site hold a valid environmental permit or authorised exemption.
- Allocate space on site for the storage of waste materials and ensure that storage areas and containers are clearly labelled so site workers know which wastes should be put there.
- Hazardous waste must be stored separately from non-hazardous wastes to avoid contamination. The Hazardous Waste Regulations make it illegal to mix hazardous waste with non-hazardous waste.
- Provide separate containers for dry recyclables, such as paper & cardboard, plastic, glass, wood and metal. This would encourage recycling and increase the potential value of the recyclable items by avoiding contamination.
- Monitor the actual quantities of wastes produced during construction, and update the Site Waste Management Plan to allow comparison with waste arisings estimated prior to construction. Record the proposed waste management option (e.g. reuse on site, recycle off-site, or dispose off-site) for each waste produced.
- All wastes that are removed off site would be described on a waste transfer note or hazardous waste consignment note (as appropriate) that tracks the movement of the waste to the specified disposal or recycling facility.
- The appointed contractors should identify appropriate staff that are responsible for waste management; and ensure that all contractor staff are aware of the appropriate reuse, recycling or disposal routes for each waste.
- Order construction materials at the right time for delivery; and the right amount that is needed at the time. Avoid ordering in bulk. This will minimise the amount of space required for storing building materials and minimise the amount of wastage from excess or spoiled materials.
- Re-using materials (either onsite/off-site) is a means of putting materials to an alternative use so that they are not wasted. This can be done during the construction phases of a

development by identifying and segregating materials already on site for re-use in the new development, such as: − bricks, concrete − internal features – historic fireplaces, timber floorboards, doors − metal frames, plastics, granite − sub-soil, top soil.

- Making materials not reused on site available for reuse elsewhere. This can be achieved using the exchange/sale/donation of construction site materials to waste recovery businesses, such as: BRE Materials Information Exchange (www.bre.co.uk); Waste Alert North London's Waste Exchange service (www.wastewatch.org.uk , etc). These specialists can sort the waste materials into various types and then find businesses that can reuse/recycle them.
- Implementing take-back' schemes with suppliers for materials and packaging. This where suppliers take back any materials not used as well as any packaging the materials are delivered in.

These measures would promote sustainable waste management practices by maximising waste prevention, re-use and recycling for material destined for offsite waste management. This would actively discourage sending waste to landfill and would promote the waste hierarchy, which is a legal requirement. It is recommended that these measures are incorporated into the Construction Management Plan (CMP) for the proposed development.

### 5.2.3 Waste-Specific Management Measures

**Inert Waste:**

Inert waste materials (for example concrete, bricks, rubble) from the demolition of the buildings should be crushed and processed in accordance with the Waste & Resources Action Programme (WRAP) Aggregates Quality Protocol[17]. This would allow for on-site reuse as engineering material complying with an appropriate engineering standard (for example the Manual of Contract Documents for Highway Works Volume 1 - Specification for Highway Works[18]).

Aggregate will normally be regarded as having ceased to be waste, and therefore no longer subject to waste management controls, provided:

- it conforms to the requirements of the European standard appropriate to the use it is destined for;
- the aggregate is produced under Factory Production Control;
- inputs are limited and controlled within Factory Production Control;
- it requires no further processing, including size reduction, for the use it is destined for;
- it is destined for a use within designated market sectors; and
- it conforms with CE conformity marking requirements contained in the Construction Products Regulations, which applies to all aggregates placed on the market to harmonised European Aggregates Standards from July 2013.

Control procedures must be in place to ensure that only the appropriate types of inert materials are received (these are listed in Appendix C of the Quality Protocol); therefore, waste acceptance criteria and procedures are required.

The acceptance criteria must include:

*17 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296499/LIT_8709_c60600.pdf*

*[18] Department for Transport (DfT), 2009, 'Manual Of Contract Documents For Highway Works Volume 1 Specification For Highway Works, DfT: London http://www.standardsforhighways.co.uk/ha/standards/mchw/vol1/index.htm*

- a list of the types of waste that are accepted (including waste codes);
- source/place of origin of the waste;
- supplier and transporting agent; and
- method of acceptance.

Every load must be inspected visually, both on initial receipt and after tipping, to ensure compliance with the acceptance criteria. A procedure for dealing with non-conforming incoming waste must be set up, for example, rejection of loads, quarantine or disposal. Records must be kept of how the procedure has been implemented.

The facility that receives the inert waste for processing into the aggregate must have an environmental permit, which can include a mobile plant where appropriate site-specific information has been provided to the Environment Agency and agreed. The processing of the inert waste must be carried out in accordance with the environmental permit and under Factory Control Procedures.

A rigorous sampling and testing regime is required to ensure that the processed material meets the required market specification according to the type of product produced.

To be able to demonstrate compliance with the Quality Protocol, producers must maintain delivery documentation for every load of recycled aggregate despatched.

Delivery documentation must include:

- date of supply;
- customer's name and contact details;
- product description to aggregates standard and customer specification;
- the name and contact details of the producer, including the address of the site of production;
- quantity supplied by weight/volume; and
- a statement that the product was produced in compliance with the Quality Protocol.

Where requested by the purchaser further documentation should also include:

- test results and procedures in accordance with the relevant aggregate industry standard or specification and for any further tests required to assess suitability for a particular end use;
- outline details of the Factory Production Control manual; and
- information on good practice relating to the storage, transportation and handling of aggregate.

For the purposes of the Quality Protocol the producer must keep and retain specified records for a minimum of two years; and make them available for inspection by the regulator (if requested).

It is important to note that even if the Quality Protocol is complied with, the material will become waste again and subject to waste management controls at any stage if it is discarded or there is an intention or requirement to discard. For example, if it is:

- disposed; or
- stored indefinitely with little prospect of being used.

These measures would reduce the amount of waste sent off-site; and promote on-site recycling into engineering-standard product, therefore, reducing the amount of material classed as waste on-site. The remaining surplus inert material would be sent off-site to a local recycling facility for processing into aggregate. This is a waste recycling measure in accordance with the waste hierarchy.

## Non-Hazardous Wastes

### Excavated Material – non-hazardous

Excavated material would comprise concrete hardstanding, bitumen, made ground and subsoil according to the specific parts of the Site. The inert concrete hardstanding would be dealt with as inert waste (see above).

It is anticipated that where possible, some of the excavated material would be retained on site for reuse as general fill as part of the construction process. Any excavated material that is surplus to requirements would be sent to an off-site facility for recovery. Landfill would be avoided in accordance with the waste hierarchy, unless no viable recovery options were available.

There are no report issues of contamination at the site. The quantity of excavated material is likely to be low. In addition, the entire Site will be occupied by the footprint of the building, so it is unlikely that construction workers or occupiers of the completed development would be at significant risk from contaminated soils.

Effective stockpile management would be essential given the constraints in size associated with the development; and location in central London. It would maximise the amount of material that can be beneficially reused on site.

Where excavated material is proposed to be used on-site, the appropriate regulatory mechanism must be followed prior to use to demonstrate that it will not cause unacceptable harm to the environment when used. The Contaminated Land: Applications In Real Environments (CL:AIRE) Definition of Waste: Development Industry Code of Practice[19] (the CoP) is anticipated to provide the framework for the reuse of the excavated material and provides principles that allows the excavated to cease to be waste when used. This would also apply to contaminated material (including excavated material classified as hazardous waste – see below), where the risk assessment demonstrated that there was no unacceptable level of risk to human health or the environment.

The CoP is supported by the Environment Agency and is subject to self-regulation, via the use of an independent assessment by a Qualified Person, who is a person that fulfils the required experience, qualifications and professional membership criteria set by CL:AIRE. The CoP sets out the principles for achieving a non-waste status by setting a risk-based approach when excavated material is used within a development. The principles are:

**The proposed use of the material must not cause any harm to human health or the environment.**

A risk assessment for the specific end use would be required following the principles defined in Environment Agency Contaminated Land Report 11[20], ('CLR11'). This would find out whether any contaminants from anthropogenic and/or natural sources present an unacceptable level of risk to human health, controlled waters, ecosystems and/or the built environment, based on the available pathways and receptors. If the level of risk is unacceptable after treatment, the CoP cannot apply to the material, therefore, it would be a waste and an environmental permit would be required to allow the reuse of the material.

[19] *Contaminated Land: Applications In Real Environments (CL:AIRE), 2011, 'The Definition of Waste: Development Industry Code of Practice' (Version 2), CL:AIRE: London*

[20] *Environment Agency, 2004 'Model Procedures for the Management of Land Contamination - Contaminated land report 11', Environment Agency, Bristol.*

**The excavated material is suitable for its proposed use.**

This would take into account the chemical and geotechnical requirements of the material in relation to a specification defined for their end use.

**The excavated material must not require further treatment prior to use.**

The material must be suitable for use in all respects without treatment. If it requires treatment, it is waste.

**The use of the excavated material is certain.**

The holder must be able to demonstrate that all of the material would be used and that use is a certainty, not a probability. The use of the excavated material must form part of the final design, so it can be clearly identified where in the scheme the material would be used; and how much would be used. This requires a Materials Management Plan to be prepared to show how and where all materials on the ground are to be dealt with; and a tracking system to monitor any waste/material movements; and also contingency measures must be defined, i.e. who takes responsibility and what happens in the event that the material is not suitable for use.

**Only a sufficient quantity of material would be used.**

The material must be destined for a defined purpose, which is defined in the scheme design. The quantity of material required for that purpose must be known prior to construction. If excess material is deposited to undertake that purpose this is an indication that it is being discarded and it would be waste.

The benefit of the CoP is that an environmental permit is not required where the principles can be met; and therefore, this promotes waste reduction, because the material ceases to be waste when it is used.

These measures would promote on-site recovery and reduce the amount of waste on-site.

A proportion of the excavated material may not be suitable for reuse due to the presence of large rocks/stones or fibrous material. This material would be stockpiled separately for off-site management in accordance with the waste hierarchy.

**Surface planings**

It is anticipated that any surface planings would be treated by crushing, grinding and screening, then used again on site in the construction of paving structures or low-grade fill, in accordance with a U1[21] Waste Exemption (Use of Waste for Construction).

**Dry Recyclables from Site Workers**

Site workers will create waste produced by themselves, by taking refreshment and from site office activities.

The most effective waste management solution for waste generated by site workers taking refreshment on site is to introduce a policy to require them to take their own waste home. This is likely to reduce the amount of waste produced.

In terms of the waste that would be produced on site, this is similar in composition to mixed municipal waste and is therefore, considered to be non-hazardous. Space should be made available to provide receptacles to collect different waste streams and allow the separate collection of dry recyclables from

[21] *https://www.gov.uk/guidance/waste-exemptions-using-waste*

residual waste. Segregation of the different streams of plastic waste (e.g. Polyethylene terephthalate (PET), High-density polyethylene (HDPE) and mixed plastics) would maximise opportunities for recycling. Some source segregated plastics, particularly PET and HDPE, can generate income. Card and paper should be separately collected as should aluminium and steel cans. Glass should be separated into different receptacles where possible. These measures would ensure that the maximum amount of waste is diverted for reuse, recycling and recovery. The food waste should also be separately collected and sent for anaerobic digestion. All receptacles for contractor waste should be clearly labelled and have lids to prevent wind-blown litter.

Frequent collections of waste should be arranged to ensure that quantities on site are within the capacity of one skip and waste is not retained on site for long periods to reduce scavengers and vermin.

The remaining residual waste should be sent to an off-site materials recycling facility.

**Excess Construction Materials**

Timely procurement and buying the required amount of material should ensure that the right amount of material is delivered at the time when it is needed. This would prevent waste from unused items because of bulk purchasing.

Ensure that perishable materials are stored so that they are protected from the local climate.

All damaged or off-specification material should be returned to the supplier where possible, which would reduce the amount of wastage.

These measures are anticipated to reduce the amount of this type of waste on site at any one time.

**Imported Materials**

Local and sustainable products would be used to minimise the effects on the environment by reducing carbon emissions from transport, promoting local businesses and saving natural resources.

**Packaging**

To minimise the effects of packaging, suppliers should be required to take back any packaging associated with their products. This would assist the suppliers in fulfilling their own producer responsibility obligations under Packaging Waste Regulations 2007[22] as amended.

Packaging materials that cannot be returned should be kept for on-site use (e.g. use of pallets for storage).

Any residual packing that cannot be used on site should be segregated into distinct dry recyclable waste streams and sent for recycling off-site. No waste packaging would be landfilled.

**Wood**

Waste timber will arise from the demolition process and waste packaging e.g. pallets. The condition of any timber waste would determine whether they can be recycled at a wood processing facility; or whether they

[22] *HMSO, SI 2007 No. 871, The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended), HMSO, London*

would have to be chipped or treated and prepared for recovery at a biological treatment facility, such as composting; or prepared for use as a fuel in an energy from waste facility.

### Hazardous Wastes

Empty fuel or oil drums should be retained for reuse on site for storing waste oil where possible. Those that cannot be retained should be sent to a drum reconditioning facility to enable the container to be prepared for re-use. Damaged drums should be sent for recycling.

These measures are anticipated to maximise waste managed at the highest waste hierarchical option and reduce the amount of waste sent off site.

The use of an active maintenance regime on plant and equipment should reduce the potential for machinery to cause leaks. Valves, stopcocks and pipes should be regularly checked for leakages. Fuelling activities should be carried out in bunded areas, or off-site.

The storage of fuels and liquids should be in accordance with the Oil Storage Regulations 2001[23] and the appropriate pollution prevention control guidelines to protect the environment from both storage and spillages of hazardous substances, which can be obtained from the government archive website[24]:

- PPG 2 - Choosing and using oil storage tanks;
- PPG 7 – Operating Refuelling facilities;
- PPG 8 - Safe storage and disposal of used oils;
- PPG 22 - Dealing with spills; and
- PPG 26 – Storage and handling drums and intermediate bulk containers.

Although these guidelines are no longer supported by the Environment Agency, they represent good practice. Using these guidelines as good waste management practice against leaks would reduce the potential for leakages, therefore reducing the volume of absorbent required to clean up spillages.

Hazardous materials should be stored securely, away from non-hazardous or incompatible materials. Small items of hazardous waste should be prevented from being disposed of in general waste skips to avoid contamination. Hazardous material should be collected frequently to minimise the total volume on site at any one time.

### Contaminated excavated material

A watching brief would be maintained during construction, and any excavated material that is suspected of contamination (e.g. because of staining or odour) would be stockpiled separately and samples taken for analysis.

Any excavated material that is found to be contaminated (including material classified as hazardous) would be assessed against the principles of the CL:AIRE CoP and reused where there is a need for the material; and it is demonstrated to be suitable for use. This would reduce the amount of material on site that is waste.

Any material found to be hazardous and unsuitable for reuse on site would be sent off-site for treatment and/or disposal as appropriate, to a facility holding a valid environmental permit that authorises treatment

[23] *HMSO, SI 2001 No. 2954, Control of Pollution (Oil Storage) (England) Regulations 2001, HMSO, London*
[24] *http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx (accessed 21 September 2016)*

or disposal of such waste. Surplus hazardous material should be sent to a treatment facility, where it can be treated to remove or reduce the levels of contamination to a level acceptable for recovery of the material. This would reduce the amount of hazardous waste from the facility going to landfill (which would have to be exported out of the region), and promotes the waste hierarchy and proximity principle.

If any excavated material is classified as hazardous and is required to be landfilled because it cannot be treated at a soil recycling facility, further testing would be carried out to ensure that it meets the Hazardous Waste Acceptance Criteria (WAC)[25] prior to landfill disposal outside of the region.

[25] *Council Decision (2003/33/EC of 19 December 2002 'establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC', European Council: Official Journal of the European Communities*

# 6 Occupation Waste Management

The Proposed Development comprises the construction of a hotel and office space and includes catering facilities.

The wastes generated will predominantly comprise Municipal Solid Wastes (MSW) from occupation of the rooms; food waste from the restaurant; and similar wastes from the office facilities, all of which are non-hazardous wastes. A small quantity of separately-collected hazardous wastes will also be produced by the hotel and offices, mainly in the form of redundant waste electrical and electronic equipment (WEEE), fridges, fluorescent tubes, flat-screen televisions; and hazardous chemicals (e.g. used oils and waste cleaning chemicals).

The most significant wastes streams from the hotel, would be waste from guest rooms and food waste from the kitchen and cafe (assuming that one is provided). Information[26] suggests that a hotel guest generates approximately 1kg MSW waste per night.

In addition, the hotel will generate food waste from the kitchen and customer plate waste. A case study[27] for 10 London restaurants surveyed in 2010 identified an average wastage of 0.48kg per diner, comprising:

- 65% of food waste comes from preparation – peelings, off cuts and anything ruined while cooking;
- 30% of food waste comes back from customers' plates; and
- 5% of food waste is classified as 'spoilage' – out-of-date or unusable items.

The assessment identifies that there are many facilities in the London region that are capable of dealing with wastes (**Appendix 1**). This includes three facilities that can take food waste to generate energy using a process called anaerobic digestion[28].

Spent cooking oil can be collected and refined for use in the production of biofuels.

There are numerous recycling companies that offer a glass waste collection service.

General municipal wastes from back-room office environments are likely to comprise mixed dry recyclables, IT equipment and miscellaneous electronics and packaging. Some items can be reused, for example cardboard boxes and rigid plastic packaging; or returned to the manufacturer to help them achieve their packaging obligations.

Separate containers should be provided on site to enable the segregation of dry waste recyclable material, particularly glass and metal cans. Ensure that these containers are clearly labelled so workers know what must go in the containers. Send the segregated recyclables to authorised recycling facilities. There will also be small quantities of non-hazardous healthcare wastes; feminine hygiene wastes and clinical wastes produced from on-site first aid. These should be managed by a specialist contractor.

There are general principles that would need to be followed to ensure effective management of operational waste arisings. These are provided below.

[26] *http://www.greenhotelier.org/our-themes/waste-management/*
[27] *http://www.thesra.org/wp-content/uploads/2012/01/SRA002-SRA-Food-Waste-Survey-Full-Report.pdf*
[28] *http://www.biogas-info.co.uk/resources/biogas-map/*

## 6.1 General Waste Management Measures

### 6.1.1 Duty of Care

The commercial occupiers of the proposed development would be under a legal obligation to comply with the waste duty of care to ensure that they handle waste safely and in compliance with the appropriate regulations.

The duty of care involves making sure that the waste has been described properly and that all of the properties associated with the waste are known; and to ensure that persons involved in the transfer of waste hold the necessary authorisation to do so.

The basic responsibilities that the commercial occupiers would be expected to follow are:

- Know whether waste is hazardous or non-hazardous.
- Store waste in suitable containers at a secure location, in a manner that prevents releases of the waste.
- Label the waste containers so that it is clear what is in them.
- Check that the waste is subsequently handled by those who hold an appropriate environmental authorisation. This means checking that the waste carrier is registered (or is exempt from having to be a registered waste carrier). It is also good practice to check that the facility that will receive the waste holds a suitable environmental permit that allows the waste to be handled on their site.
- Provide documentation with any waste transfer that accurately describes the waste and contains the relevant code for the waste.
- Keep records of all waste transfers in a register.

### 6.1.2 Hazardous waste

It is a fundamental requirement of the Waste Duty of Care to know the difference between hazardous waste and non-hazardous waste (see **Section 2.3)**. The controls that are applied to hazardous waste are stricter. All hazardous waste must be segregated from non-hazardous wastes or other non-waste materials. All hazardous wastes must be accompanied by a hazardous waste consignment note when shipped form site.

### 6.1.3 Producer Responsibility

Producer responsibility requires businesses to:

- minimise waste arising and promote their re-use;
- ensure the waste products are treated and meet recovery and recycling targets for the waste materials; and
- design products by reducing material use and enhancing reusability and recyclability.

The key requirements for commercial occupiers of the proposed development in terms of producer responsibility would be to ensure Waste Electrical and Electronic Equipment (WEEE), batteries and packaging are managed appropriately.

### 6.1.4 WEEE and Batteries

WEEE and waste batteries must be collected separately from other wastes and sent to the appropriate recycling facilities. If a business does have WEEE or batteries to recycle, it has a Duty of Care to act

responsibly and ensure that the contractor it appoints to collect it is legitimate and has the appropriate licences and permits.

A business should ensure that the waste is taken to a suitable facility to be treated and recycled. The site must have a permit or licence that allows them to accept trade waste. For WEEE waste, it must obtain and keep proof that WEEE was given or sold to a waste management (or asset management) business, and was treated and recycled in an environmentally sound way.

All WEEE from a business should go through an AATF or ATF AATF (Approved/Authorised Treatment Facilities) for treatment and recycling. The waste batteries must go to an Approved Battery Treatment Operator (ABTO) or an Approved Battery Exporter (ABE) for treatment and recycling.

### 6.1.5 Packaging

The Packaging Waste Regulations require businesses or organisations to:

- reduce packaging;
- reduce how much waste packaging goes to landfill; and
- increase the amount of packaging waste that is recycled and recovered.

Compliance is facilitated by the segregation of packaging from other waste; and the segregation of different types of packaging from each other (e.g. separating plastic packaging from paper and cardboard packaging; and segregation of glass).

The amount of packaging waste held by a business or organisation can be reduced by returning as much packaging back to the supplier as possible. This in turn will help suppliers achieve their obligations under the Packaging Waste regulations.

### 6.1.6 Landfill disposal

Before any waste can be sent to landfill, the waste producer/holder must ensure that the option for landfill has been justified in accordance with the waste hierarchy.

It is a legal requirement that all wastes going for landfill must be pre-treated, unless treatment is not technically possible (note, this applies to inert wastes only); or if treatment would not reduce the quantity or the hazards that it poses to human health or the environment. The proposed pre-treatment option must comply with the definition of ‘treatment’. This involves a ‘three-point test’:

- It must be a physical, thermal, chemical or biological process including sorting.
- It must change the characteristics of the waste. and
- It must do so in order to:
  - reduce its volume; or
  - reduce its hazardous nature; or
  - facilitate its handling; or
  - enhance its recovery.

## 6.2 Storage

Occupiers of commercial premises are legally obliged to make an arrangement with either the Council or a licensed waste carrier for the collection of the waste produced from the premises.

Provision for ground floor storage is identified in 'HOTEL & OFFICE WORKING SPACES' document (ambigram architects, June 2018). The design of waste storage areas would be confirmed at detailed design stage.

Consideration would be given to vehicle access and egress to ensure the facilities can be easily serviced by waste collection vehicles. Service access arrangements are identified in the Transport Assessment.

A dedicated layout reporting the location of all waste storage areas should be prepared and made available to all concerned personnel. The layout shall be reviewed on an annual basis and immediately after any significant changes.

Special consideration must be given to the location and nature of external storage areas for food waste. This waste has a high biodegradable content, therefore can potentially cause nuisance from odour, visual blight, and through attraction of vermin and scavengers. Storage of such waste should be in solid receptacles which prevent negative environmental impacts

Developments that generate food waste must comply with the requirements of the Animal By-Products Regulations 2005. The Regulations place controls on the collection, handling, transport, storage and disposal of animal by-products, which includes catering waste. This may have implications for the design of the building and the waste containers required.

Any waste food (including used cooking oil) that comes from restaurants, catering sites, commercial or household kitchens is defined as catering waste. Catering waste is a category 3 ABP.

The Regulations stipulate how catering waste and former foodstuffs can be disposed; and how catering waste must be kept separate from medium or high risk former foodstuffs (for example, raw meat and fish). This waste cannot be sent for use in animal feed.

General storage requirements should adhere to the following principles:

- The space would be adequate to store the predicted accumulation of waste between waste collections;
- The bin storage would be easily accessible to users of the facility;
- Waste collected from the bins would be accumulated in a waste compound for temporary storage prior to collection;
- The waste compound storage would be easily accessible to waste collectors; and
- The storage would be adequate to accommodate all of the different types of storage containers to meet current and proposed residual waste and waste recycling regimes by waste management companies collecting the waste.

All wastes shall be stored in dedicated areas which should be:

- Identified by appropriate signage;
- Paved or protected from direct contact with the ground; and
- Protected from bad weather conditions (rain, wind, extreme temperatures).

## CPG1

The Council's specific requirements for the storage of waste, design of waste storage facilities; and the location of such facilities, is provided in CPG1.

The volume of waste generated and thus the number and type of containers that a commercial development requires is ultimately dependent on the use of the building. As a general guide, approximately one cubic metre storage space is required for every 300-500m$^2$ of commercial space (includes both recyclable and non-recyclable waste).

Storage space must be designed to accommodate the minimum number of containers or bins to hold the amount of waste, which is appropriately separated or segregated in accordance with the legal requirements and the requirements of the waste collection contract. Even if a recyclables collection program is not proposed, space must be allocated to locate bins for storage of likely recyclable waste.

CPG1 makes specific requirements for commercial establishments with regards to waste storage:

- Storage should not be located near ground storey windows. They should be located within 10 metres of an external access.
- External storage areas and collection points must be as close as possible to, and preferably within 10 metres of, a place suitable for a collection vehicle to stop.
- Storage facilities must be at or near street level, and should be accessible via appropriately sized and graded ramps to allow bins to be wheeled to and from the collection point easily.
- Must be safe for users by being well lit and visible from public vantage points and nearby dwellings / tenancies.
- Should be unroofed, unless they are fully enclosed and secured (ideally inaccessible to animals).
- Should be accessible for collection purposes and not impede pedestrian or vehicular access on public thoroughfares or to and from buildings.
- Should be in an enclosed chamber that can be accessed from outside the building.

External storage space for large waste containers is generally sought for most non-residential development. The external storage space should be at or near street level, and within 10 metres of a place suitable for a collection vehicle to stop. If appropriate external storage space for waste cannot be provided within 10 metres of the public highway, it will generally be necessary for the collection vehicle to access the development site. In this case, circulation spaces will need to be considered in the same way as those for service vehicles. Service Access requirements are provided in the Transport Assessment.

Consideration would be given to vehicle access and egress to ensure the facilities can be easily serviced; and that waste compound areas are secure and can be accessed by waste collection vehicles.

# 7 Conclusion

## 7.1 Construction Phase

The total additional waste arisings from the construction phase of the Proposed Development were predicted to be:

| Waste category | Proposed arisings | Proposed arisings per month |
|---|---|---|
| | Tonnes | Tonnes |
| Inert | 3463.76 | 192.4 |
| Non-hazardous | 2195.79 | 122.0 |
| Hazardous | 5.14 | 0.3 |

### Inert Wastes

The waste management measures identified above would reduce the amount of inert wastes from demolition by ensuring that the maximum amount of this material is processed on-site to enable it to be recycled into an engineering standard product in accordance with the Aggregates Quality Protocol. Where this cannot be achieved, other on-site uses such as recovery as backfill would be prioritised over any off-site options. Therefore, the measures would reduce the amount of material requiring off-site management to a minimum; and there are sufficient facilities within the region to recycle this material.

### Non-Hazardous Wastes

The waste management measures proposed for excavated material would promote the reuse of this material in accordance with the CoP, where possible. The proposed use on site would be considered a justifiable option under the waste hierarchy, because the retention of the material on site would prevent emissions associated with removal from the Site. Furthermore, the proposal to use the material on-site achieves the status of non- waste, where the CoP is followed; and has the further benefit of embracing the proximity principle by being used at the site where it came from. Therefore, the use of the CoP would reduce the quantity waste being managed, because if the principles of the CoP are followed, the excavated material ceases to be waste when used.

Any excavated material that is not suitable for use on site or is surplus to requirements for use for construction purposes would be sent off-site in accordance with the waste hierarchy. Options for reuse or recovery would be prioritised to ensure that the amount of waste excavated material being disposed to landfill is reduced to an absolute minimum.

The return of packaging and excess / out-of-specification material to suppliers; and the reuse of such wastes would also reduce the amount of waste. Any residual packaging would be sent to an off-site recycling facility and there are sufficient facilities within the region to recycle this material.

### Hazardous Wastes

The waste management measures proposed would effectively reduce the amount of hazardous excavation waste on site as a consequence of the material ceasing to be waste when reused under the CL:AIRE CoP; and also reduce the amount that requires off-site disposal.

Off-site options for surplus material or material that was not suitable for use would be prioritised towards soil treatment to reduce or remove contaminants to a level that would facilitate the reuse or recovery of the treated material; thereby promoting the waste hierarchy. There is no hazardous waste landfill capacity in

the region, therefore, any hazardous waste excavated material requiring disposal could have to be exported out of the region. The use of local or regional treatment facilities to treat the contaminated material as an alternative to landfill would promote the proximity principle by avoiding the need to export the material out of the region.

There are sufficient facilities within the region to recycle or treat ad hoc hazardous wastes (such as waste oils etc.).

## 7.2 Completed Development

Any wastes produced during operation would be managed in accordance with the general principles of the waste duty of care and producer responsibility to ensure effective waste management should they arise.

Separate receptacles should be provided for dry recyclables, such as paper & cardboard, plastic, glass, wood and metal. This would facilitate the most appropriate reuse, recycling or recovery option in accordance with the waste hierarchy.

The required storage provision for the Proposed Development would ensure that:

- The space would be adequate to store the predicted accumulation of waste between waste collections;
- The storage would be accessible to occupants and collectors; and
- The storage would be adequate to accommodate all of the different types of storage containers to meet current and proposed residual waste and waste recycling regimes by waste management companies collecting the waste.

This waste has a high biodegradable content, therefore can potentially cause nuisance from odour, visual blight, and through attraction of vermin and scavengers. Such waste can be sent for recovery (for example at anaerobic digestion plants) to generate energy. Catering waste must be kept separate from medium or high risk former foodstuffs (for example, raw meat and fish).

There is a wide range of facilities in the local area that has the capacity to deal with all of the wastes that are likely to be produced during operation.

# A1 Appendix 1 - List of waste management facilities within 10km from the proposed development

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Industrial Installation Permits | | | | |
| European Metal Recycling Limited | WP3632WD | 106, Scrubs Lane, NW10 6QY | 6.8 | Temporary storage of haz waste not under s 5.2 pending activities listed in s 5.1, 5.2, 5.3 and paragraph (b) of this section with a total capacity > 50 tonnes, excl temp storage where generated\| disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment\| recovery or a mix of recovery and disposal of > 50 t/d non-hazardous waste (> 100 t/d if only ad) involving treatment in shredders of metal waste, including WEEE and ELV and their components |
| Powerday plc | YP3338FF | Old Oak Sidings, Off Scrubs Lane, NW10 6RJ | 7.5 | Disposal or recovery of haz waste with capacity exceeding 10 tonnes per day involving repackaging prior to submission to any of the other activities listed in this section or in section 5.1 |
| Veolia ES Southwark Ltd | PP3737GT | Southwark Integrated Waste management Facility, 43 Devon Street, London, Southwark, SE15 1AL | 8.1 | The incineration of hazardous waste in an incineration or co-incineration plant with a capacity exceeding 10 tonnes per day \| disposal of > 50 t/d non-hazardous waste (> 100 t/d if only ad) involving biological treatment |
| South East London Combined Heat and Power Limited | NP3738SY | The Kennels Site, Landmann Way, Lewisham, SE14 5RS | 8.5 | The incineration of non-hazardous waste in an incineration or co-incineration plant with a capacity exceeding 3 tonnes per hour \| associated process |
| Regional Waste Recycling (Commercial) Ltd | TP3637WL | 12, Barbers Road, Stratford, E15 2PH | 8.6 | Recovery or a mix of recovery and disposal of > 50 t/d non-hazardous waste (> 100 t/d if only ad) involving biological treatment |
| Seneca | MP3930WC | Unit 2, Hannah | 8.8 | Recovery or a mix of recovery and |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Environmental Solutions Ltd | | Close, Neasden, London, NW10 0UX | | disposal of > 50 t/d non-hazardous waste (> 100 t/d if only ad) involving pre-treatment of waste for incineration or co-incineration |
| Brent Oil Contractors Limited | YP3732MN | Unit 28, Fourth Way, Middlesex, HA9 0LH | 9.4 | Temporary storage of haz waste not under s 5.2 pending activities listed in s 5.1, 5.2, 5.3 and paragraph (b) of this section with a total capacity > 50 tonnes, excl temp storage where generated |
| Waste Operation Permits | | | | |
| Arbuckle William David | EP3491NW/A001 | 7, St Pancras Way, London, NW1 0PB | 0.4 | A20 – Metal Recycling Site (mixed MRS's) |
| Hall Ronald Herbert Charles | AP3691NW/A001 | St Pancras Metals, 86, Pancras Road, London, NW1 1WJ | 0.6 | A20 – Metal Recycling Site (mixed MRS's) |
| Veolia Water Organics Recycling Ltd | FB3433RV/V002 | Kings Place 5th Floor, 90, York Way, London, N1 9AG | 1.1 | SR/05 - Mobile plant for reclamation, restoration |
| Veolia E S Landfill Ltd | LB3333AL/A001 | 8th Floor, 210, Pentonville Road, London, N1 9JY | 1.4 | SR/05 - Mobile plant for reclamation, restoration |
| Veolia E S Landfill Ltd | DB3606XL/A001 | Mobile Plant | 1.4 | S0827- Mobile Plant for remediation of land |
| The Royal Parks | CB3106XV/A001 | Regents Park Office, The Store Yard, Inner Circle, Regents Park, London, NW1 4NR | 1.7 | A22 - Composting Facility |
| Londonenergy Ltd | GB3230DW/V002 | Recycling Centre, Regis Road, Kentish Town, London, NW5 3EW | 1.8 | A13 - Household Waste Amenity Site |
| Hague Construction Limited | GB3102XC/A001 | Mobile Plant | 1.9 | SR/11 - Mobile plant treatment for soil <75,000 tpd |
| Hague Construction Limited | GB3103CW/A001 | Mobile Plant | 1.9 | S0827 - Mobile Plant for remediation of land |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Recycled In Ardleigh Limited | EB3603UR/A001 | Mobile Plant | 2.1 | SR/11 - Mobile plant treatment for soil <75,000 tpd |
| Londonenergy Ltd | CP3497NL/V002 | 40, Hornsey Street, Islington, London, N7 8HU | 2.2 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Londonenergy Ltd | HB3132RH/V002 | 40, Hornsey Street, Islington, London, N7 8HU | 2.2 | A13 - Household Waste Amenity Site |
| Brownfield Remediation Solutions Limited | DB3036RC/A001 | 12, Tanfield Close, Cheshunt, Herefordshire, EN7 6BH | 2.8 | S0827 - Mobile Plant for remediation of land |
| E P R Thetford Limited | BB3408KC/V002 | Mobile Plant | 2.9 | SR/04 - Mobile plant for land spreading |
| Edward James Buckley | RP3291NS/A001 | Land/ Premises At, Clare Lane, Islington, London, N1 3DB | 3.3 | A20 – Metal Recycling Site (mixed MRS's) |
| Ronald Sidney Stewart & Alfred Dennis Stewart | RP3891NN/A001 | 504a, Hornsey Road, London, N19 3QW | 3.8 | A20 – Metal Recycling Site (mixed MRS's) |
| Royal Household Property Section | GB3236AS/A001 | Buckingham Palace, London, SW1A 1AA | 3.8 | A22 – Composting Facility |
| Ecovert F M Ltd | MP3293EV/A001 | Mobile Plant | 3.9 | A24 - Mobile Plant |
| The Royal Parks - Kensington Park | CB3106TC/A001 | Kensington Gardens Office, The Magazine Store Yard, Kensington Gardens, London, W2 2UH | 4.0 | A22 – Composting Facility |
| Tetron Point L P | BB3235DJ/A001 | Fredrick Mews, 2, Kinnerton Street, Knightsbridge, London, SW1X 8EQ | 4.0 | SR/11 - Mobile plant treatment for soil <75,000 tpd |
| Cory Environmental Ltd | DP3691ND/V002 | Walbrook Wharf Transfer Station, Upper Thames Street, London, EC4R 3TD | 4.3 | A11 - Household, Commercial & Industrial Waste Transfer Station |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Cory Environmental Ltd | GP3790EN/T008 | Cringle Dock S W T S, Cringle Street, Battersea, London, SW11 8BX | 5.9 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| P B Donoghue (Haulage & Plant Hire) Ltd | NP3691NX/V002 | 3, Shannon Close, Cricklewood, London, NW2 1RR | 6.0 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Laing O Rourke Infrastructure Limited | DB3804MV/A001 | Battersea Station Project Offices, Battersea Park Road, London, SW8 4BZ | 6.2 | S0905 - Inert & Excavation WTS |
| Day Group Ltd | CB3631AD/A001 | Stewarts Lane Depot, 100, Silverthorne Road, Battersea, London, SW8 3EG | 6.8 | A16 - Physical Treatment Facility |
| Londonenergy Ltd | CB3403FJ/V004 | Hendon Transfer Station, Brent Terrace, Tilling Road, Hendon, London, NW2 1LN | 6.9 | A1 - Household, Commercial & Industrial Waste Transfer Station |
| Londonenergy Ltd | CB3403GQ/V002 | Hendon H W R C, Brent Terrace, London, NW2 1LN | 6.9 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Kensington & Chelsea Royal Borough | VP3496ND/A001 | Cremorne Wharf, 27, Lots Road, London, SW10 1QH | 6.9 | A13 - Household Waste Amenity Site |
| Cory Environmental Ltd | BP3799EL/A001 | Wandsworth Road Goods Yard, Wandsworth Road, Pensbury Place, London, SW8 4TP | 7.0 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| European Metal Recycling Ltd | RP3890EL/V003 | Private Sidings, Pensbury Place, Wandsworth, London, SW8 4TR | 7.0 | A19 - Metal Recycling Site (Vehicle Dismantler) |
| P H S Group Plc | NP3990EB/A001 | Phs Camberwell, 66, Wells Way, Camberwell, London, SE5 7UA | 7.1 | A12 - Clinical Waste Transfer Station |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| J Simpson Waste Management Ltd | FB3203UC/T001 | 108, Scrubs Lane, Willesden, London, NW10 6QY | 7.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Mc Govern Haulage Ltd | JB3531RA/T001 | 26-27, Claremont Ind Est, Hendon, London, NW2 1BG | 7.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Suez Recycling & Recovery South East Ltd | AB3700GY/V006 | British Rail Goods Yard, Pensbury Place, Wandsworth Road, London, SW8 4TR | 7.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Mc Govern Haulage Ltd | JB3532AL/T001 | Claremont Way Ind Est, Brent Terrace, London, NW2 1BG | 7.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Ground Waste Recycling Limited | SP3593EM/V | Nightingale Works, Brent Terrace, Claremont Way Ind Est, London, NW2 1LR | 7.2 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| G B Railfreight Limited | AB3200KE/V003 | Upside Railway Yard, Brent Terrace, Cricklewood, London, NW2 1LN | 7.2 | A14 - Transfer Station taking Non-Biodegradable Wastes |
| European Metal Recycling Limited | FB3205MK/V002 | 106, Scrubs Lane, Willesden, London, NW10 6QY | 7.2 | A20 – Metal Recycling Site (mixed MRS's) |
| The Mayor And Burgesses Of The London Borough Of Hackney | AP3599LU/V004 | Millfields Recycling Facility, Millfields Road, Hackney, London, E5 0AR | 7.3 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| G B Railfreight Limited | FB3202CV/A001 | Brent Terrace, Cricklewood, London, NW2 1LL | 7.4 | S0905 - Inert & Excavation WTS |
| O' Donovan ( Waste Disposal ) Ltd | WP3391NT/A001 | 82, Markfield Road, Tottenham, London, N15 4QF | 7.4 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| O' Donovan ( Waste Disposal ) Ltd | AP3695SX/A001 | 100a, Markfield Road, Tottenham, London, N15 4QF | 7.5 | A16 - Physical Treatment Facility |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Powerday Plc | PP3093EE/V006 | Old Oak Sidings, Off Scrubs Lane, Willesden, London, NW10 6RJ | 7.5 | A15 - Material Recycling Treatment Facility |
| Tipmaster Limited | VP3791EG/A001 | 15 Rigg Approach, Lea Bridge Road, Leyton, London, E10 7QN | 7.6 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Sadler David | BP3391NC/A001 | Arch 433, Burdett Road, Bow, London, E3 4JS | 7.7 | A20 – Metal Recycling Site (mixed MRS's) |
| McGrath Bros ( Waste Control ) Ltd | EP3697NT/V002 | Mcgrath House, Hepscott Road, Hackney, London, E9 5HH | 7.8 | A15 - Material Recycling Treatment Facility |
| Westminster Waste Ltd | EB3338AX/V002 | 38-40, Verney Road, Bermondsey, London, SE16 3DH | 7.8 | S0803 - HCI Waste TS + treatment |
| Argall Metal Recycling Ltd | EP3193MN/V002 | Unit 1, 5 Staffa Road, Leyton, London, E10 7PY | 7.8 | A20 - Metal Recycling Site (mixed MRS's) |
| Dem'cy Contractors Ltd | SP3391NU/V004 | 5, Staffa Road, Leyton, London, E10 7PY | 7.8 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| L Lynch ( Plant Hire & Haulage ) Ltd | BB3304UC/T001 | Willesden Freight Terminal, Off Channel Gate Road, Willesden, London, NW10 6UQ | 7.8 | A14 - Transfer Station taking Non-Biodegradable Wastes |
| Space Rubbish Limited | CB3407XP/T001 | Atlas Wharf, Atlas Road, Park Royal, London, NW10 6DN | 7.9 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Cappagh Public Works Ltd | DB3407MN/A001 | Willesden Freight Terminal, Channel Gate Road, Willesden, London, NW10 6VQ | 7.9 | S0905 - Inert & Excavation WTS |
| X - Bert Haulage Limited | ZP3497NS/V002 | Unit 6 Neasden Goods Yard, Neasden Lane, London, NW10 2UG | 7.9 | A11 - Household, Commercial & Industrial Waste Transfer Station |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| Bates Henry Frederick | PP3491NM/V002 | 94, Fairfield Road, Bow, London, E3 2QP | 8.0 | A20 – Metal Recycling Site (mixed MRS's) |
| Ace Waste Haulage Ltd | YP3095EM/V002 | Neasden Goods Yard, Neasden Lane, Wembley, London, NW10 2UG | 8.0 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Barnet London Borough Council | WP3291NG/V002 | C A Site, Summers Lane, London, N12 0ED | 8.1 | A13 - Household Waste Amenity Site |
| Londonenergy Ltd | DB3302UH/V002 | Land/premises At, Summers Lane, London, N12 0RF | 8.1 | A13 - Household Waste Amenity Site |
| Londonenergy Ltd | JB3432AB/V003 | 42a, South Access Road, Walthamstow, London, E17 8AX | 8.1 | S0813 - Non-hazardous & hazardous HWA Site |
| Mr Nicholas Ashley | AP3590EM/A001 | 140, Ilderton Road, London, SE15 1NT | 8.2 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Quattro (UK) Ltd | NP3097NX/A001 | Regency Street, Victoria Road, Park Royal, London, NW10 6NG | 8.2 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| J B Riney & Co Ltd | BP3091NX/V003 | 455, Wick Lane, Bow, London, E3 2TB | 8.2 | A14 - - Transfer Station taking Non-Biodegradable Wastes |
| Powerday Plc | JB3637RK/T001 | 4-16 & 1-3, Belinda Road, Brixton, London, SW9 7DT | 8.2 | S0803 - HCI Waste TS + treatment |
| R T S Waste Management Limited | HB3332AY/V003 | Unit 1, Stockholm Road, Deptford, London, SE16 3LP | 8.3 | S0803 - HCI Waste TS + treatment |
| Lambeth London Borough Council | UP3190EV/A001 | Public Health & Pest Control, 26, Wanless Road, London, SE24 0HW | 8.3 | A12 - Clinical Waste Transfer Station |
| Veolia E S Southwark Ltd | CP3198VG/V007 | 43, Devon Street, London, SE15 1AL | 8.3 | A09 - Special Waste Transfer Station |
| D B Cargo ( U K) Limited | BP3698EQ/V006 | Marshgate Sidings, Pudding Mill Lane, Bow, London, E15 | 8.4 | A14 - - Transfer Station taking Non-Biodegradable Wastes |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| | | 2PJ | | |
| New Southgate Metal Co Ltd | VP3691NN/V002 | BR Goods Yard, Station Road, London, N11 1QH | 8.4 | A20 – Metal Recycling Site (mixed MRS's) |
| South East London Combined Heat And Power Limited | NP3738SY/V005 | The Kennels Site, Landmann Way, London, SE14 5RS | 8.5 | S0801 - HCI Waste Transfer Station |
| S. Walsh & Son Limited | DB3808UK/V002 | Marshgate Sidings, Pudding Mill Lane, Bow, London, E15 2PJ | 8.5 | A14 - - Transfer Station taking Non-Biodegradable Wastes |
| S S S I Limited | FB3805UM/T001 | Deptford Recycling Centre, Landman Way, Deptford, London, SE14 5RS | 8.5 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| London Borough of Lewisham | ZP3290EQ/V002 | Lewisham Recycling & Waste Reception Centre, Landmann Way, New Cross, London, SE14 5RS | 8.5 | A13 - Household Waste Amenity Site |
| Ferns Surfacing Limited | EB3402KL/A001 | Drury Way, Wembley, London, NW10 0JJ | 8.6 | A16 - Physical Treatment Facility |
| Regional Waste Recycling (Commercial) Ltd | JP3596NH/V010 | Barbers Road Facility, 12, Barbers Road, Stratford, London, E15 2PH | 8.6 | A17 - Physico-Chemical Treatment Facility |
| G B N Services Ltd | YP3797NG/V003 | Estate Way, Church Road, Leyton, London, E10 7JN | 8.6 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| G B N Services Ltd | YP3391NF/V002 | Estate Way, Church Road, Leyton, London, E10 7JN | 8.6 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Pulse Environmental Limited | PB3037AT/V002 | Unit 7 A & B, 210, Church Road, Leyton, London, E10 7JQ | 8.6 | S0814 - Materials Recycling Facility |
| City Oils Limited | SP3330NY/V003 | Vulcan Wharf, Cooks Road, | 8.6 | A17 - Physico-Chemical Treatment |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| | | London, E15 2PW | | Facility |
| Economic Skips Ltd | XP3990EF/V004 | Economic Skips Ltd, 3, Mercury Way, London, SE14 5RR | 8.7 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| C & G Demolition & Site Clearance Ltd | XP3090EW/V002 | C & G Demolition & Site Clearance Ltd, 7, Mercury Way, New Cross, London, SE14 5RR | 8.8 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| First Mile Limited | EB3803HH/A001 | 32-38a, Minerva Road, Park Royal, London, NW10 6HJ | 8.8 | S1506 - 75kte HCI Waste TS + treatment |
| Pauncefort Guy | WP3096NZ/V002 | Grange House, Unit 39, Steele Road, London, NW10 7AR | 8.8 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Seneca Environmental Solutions Ltd | PP3496EU/V006 | Unit 2 Hannah Close, Great Central Way, Neasden, London, NW10 0UX | 8.8 | A09 - Special Waste Transfer Station |
| Clifford Devlin Ltd | PP3191NJ/A001 | Clifford House, Towcester Road, Bow, London, E3 3ND | 8.8 | A09 - Special Waste Transfer Station |
| Cory Environmental Ltd | FP3598VA/A001 | Smugglers Way, Wandsworth, London, SW18 1EG | 8.9 | A15 - Material Recycling Treatment Facility |
| Personnel Hygiene Services Ltd | CB3908XC/A001 | Osier Way, Leyton, London, E10 5SB | 8.9 | A12 - Clinical Waste Transfer Station |
| Bywaters (1986) Limited | SP3091NQ/V010 | Bywaters (1986) Limited, Gateway Road, London, E10 5BY | 8.9 | A13 - Household Waste Amenity Site |
| Waltham Forest London Borough Council | PP3493EQ/A001 | Land/premises At, Gateway Road, Leyton, London, E10 5BY | 9.0 | A13 - Household Waste Amenity Site |
| Deme Environmental Contractors | FP3895HM/V003 | Dec Uk Branch, Greenstede House, Wood Street, East Grinstead, West | 9.0 | A24 – Mobile Plant |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| | | Sussex, RH19 1UZ | | |
| Dredging, Environment And Marine Engineering ( D E M E) N V | VP3598VH/A001 | Mobile Plant | 9.0 | A24 – Mobile Plant |
| Cory Environmental Ltd | KP3690EV/T005 | Western Riverside S W T S, Smugglers Way, Wandsworth, London, SW18 3JU | 9.0 | A09 - Special Waste Transfer Station |
| Western Riverside Waste Authority | FB3307KC/T001 | Feathers Wharf, Smugglers Way, Wandsworth, London, SW18 1FW | 9.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Quattro ( U K ) Limited | DB3705LE/T001 | Horn Lane W T S, 307, Horn Lane, Acton, London, W3 0BP | 9.1 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Quick Skips London Recycling Ltd | FB3907UH/T001 | Quick Skips London, Unit 3, Ailsa Street, London, E14 0NE | 9.2 | S0803 - HCI Waste TS + treatment |
| Seneca Environmental Solutions Ltd | UP3790VY/A001 | Carey House, Great Central Way, Wembley, London, HA9 0HR | 9.2 | SR/11 - Mobile plant treatment for soil <75,000 tpd |
| Wandsworth London Borough Council | KP3990EJ/V002 | Frogmore Depot, Dormay Street, Wandsworth, London, SW18 1HA | 9.3 | A09 - Special Waste Transfer Station |
| L & B Haulage & Civil Engineering Contractors Ltd | DP3791NJ/V003 | Hannah Close, Great Central Way, Neasden, London, NW10 0UX | 9.3 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Bywaters ( Leyton ) Ltd | SP3093EA/V004 | Unit J Prologis Park, Twelvetrees Crescent, Bow, London, E3 3JG | 9.3 | A09 - Special Waste Transfer Station |
| London Borough Of Barnet | FB3303HB/A001 | Oakleigh Road South Depot, Oakleigh Road South, London, N11 | 9.3 | S1504 - 75kte HCI Waste TS |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| | | 1HJ | | |
| Seneca Environmental Solutions Ltd | UP3698VF/A001 | Mobile Plant | 9.4 | S0827 Mobile Plant for remediation of land |
| G B N Services Ltd | SP3793EK/V004 | G B N Services Ltd, Oakleigh Road South, Friern Barnet, London, N11 1HJ | 9.5 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Cannon Hygiene Limited | FB3906FW/T001 | Unit 2 Sovereign Park, Coronation Road, Park Royal, London, NW10 7QP | 9.5 | A12 - Clinical Waste Transfer Station |
| Cannon Hygiene Limited | FB3807GA/T001 | Unit 2 & Yard, Sovereign Park, Coronation Road, Park Royal, London, NW10 7QP | 9.5 | A12 - Clinical Waste Transfer Station |
| Cannon Hygiene Limited | FB3906GA/T001 | The Service Yard To Unit 2, Sovereign Park, Coronation Roa, Park Royal, London, NW10 7QP | 9.5 | A12 - Clinical Waste Transfer Station |
| The Remet Company Ltd | QP3396NZ/V003 | 9a Cody Business Centre, South Crescent, London, E16 4TL | 9.5 | A20 – Metal Recycling Site (mixed MRS's) |
| Hunt Christopher Joseph Thomas | MP3593EJ/A001 | Rear Of 160 Bridport Road, Commercial Road, Edmonton, London, N18 1SY | 9.5 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Brent Oil Contractors Ltd | RP3796NJ/V003 | Wembey Stadium Ind.Estate, Fourth Way, Wembley, Middlesex, HA9 0EP | 9.5 | A09 - Special Waste Transfer Station |
| Bridgemarts Limited | AB3701MU/V002 | Bridgemart, 100, Twyford Abbey Rd, Park Royal, London, NW10 7XE | 9.6 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| H A W K Rubbish Clearance Limited | DB3005CV/A001 | Unit 4, Second Way, Wembley, Middlesex, HA9 0YJ | 9.7 | S0803 - HCI Waste TS + treatment |

| Name | Permit No. | Address | Distance from Site (km) | Facility type |
|---|---|---|---|---|
| X- Bert Haulage Ltd | MB3431AS/T001 | Glyn Skips, Fifth Way, Wembley, Middlesex, HA9 0YJ | 9.7 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Mcfen Plant Limited | CB3704CL/A001 | 7c, South Crescent, London, E16 4TL | 9.7 | S0803 - HCI Waste TS + treatment |
| Orion Support Services Limited | BB3400MJ/V003 | 11a, Cody Road Business Centre, Sou, Canning Town, London, E16 4SR | 9.7 | A16 - Physical Treatment Facility |
| Cory Environmental Ltd | GB3332AD/T001 | Northumberland Wharf, Yabsley Street, Poplar, London, E14 9RG | 9.8 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| West London Waste Authority | RP3296NC/V007 | Twyford Waste Transfer Station, Abbey Road, Stonebridge, London, NW10 7TJ | 9.8 | A11 - Household, Commercial & Industrial Waste Transfer Station |
| Aggregate Industries U K Ltd | CB3006LS/T001 | Stone Terminal, Horn Lane, Acton, London, W3 9EH | 9.8 | A16 - Physical Treatment Facility |