

St Pancras Commercial Centre – Waste Strategy Response

This is a supplementary response that has been prepared following comments/questions received from Linda Hall-Brunton (Camden Principal Environmental Services Officer) received via email on 11th October 2019.

Question 01: Please ask the developer to confirm that suitable internal residential space and storage has been designed to accommodate all the waste types produced, to be segregated and if there is a mechanical or operational servicing equipment or systems that these have been checked against access and egress plans and a secondary transfer route is in place i.e. in the event of equipment failure. This should be separately set out for residential and commercial produced wastes.

Response: Both residential waste stores have been designed with space for refuse, recycling, bulky items, WEEE, food waste and textiles. Please see attached sketches (477_CSJ_M1_GF_SK_A_071_S1_C and 477_CSJ_A1_GF_SK_A_081_S1_C) which are each based on LBC guidelines for buildings with up to 20 residential units. Since the affordable block is fourteen units this may be an overprovision. There are no proposals for mechanical equipment in either residential waste store. The office building has its own dedicated ground floor waste store, but the waste produced by the light industrial tenants will vary enormously according to the use and we have assumed that they contain their own waste within their demise and make their own arrangements for collection.

Question 02: Please also consider the requirement for all loading and unloading using heavy equipment such as compactors or RCV's to occur on level ground as there is a change of level within the site.

Response: Landscape Architects JCLA have provided a drawing indicating some revisions to the pavement on Georgiana Street which means there are dropped kerbs of greater than 2.0m width within 10m of both the residential stores (see attached JCLA drawing SP108_02_GM & SP108_11_01_P2 which will show the dropped kerbs).

The commercial waste store can be serviced from Pratt Street, which is within 15m, in which case a dropped kerb will be required, or from the internal street. The slope of the internal street is relatively gentle; however the headroom of 4.0m at the entrance means a commercial refuse collection provider will be selected who can operate within this limitation.

Question 03: I will in due course require clarity on their proposed route, types volumes and frequencies of collection. Please ensure that they have full grasp of the technical waste guidance in place and CPG section 8 and that this is included in the introductory planning and local guidance referencing for the WSP.

Response: This is noted and will be incorporated into a Servicing and Maintenance Scheduling Plan that will be prepared as a condition prior to occupation (see also question 08).

Question 04: If they can confirm if they have researched local commercial EA approved waste collection providers and their actual availability for servicing this site based on their assumed waste outputs?

Response: Ongoing.

Question 05: There are limitations to the availability and siting of mechanical lifting and consolidation equipment for residential, without a commercial charge then applied, otherwise it is a once weekly servicing arrangement without compaction (Contact Veolia for more information). Consider the design of areas that would be required to restrict public access during the compaction, consolidation, sorting or loading and unloading activities and the need to adhere to and reference the EA site licencing terms for the opted activities (shared or bespoke) within a site, including suitable bund or drainage for wash down or leakage capture.

Response: Both residential waste stores are lobbied and can be closed to tenants during loading. The comment about EA licencing is helpful and we will include bunding and washdown facilities in the detailed design as required.

Questions 06 and 07: Please update the tables to represent this, I noted 1 visit proposed per day for residential, but it was not clear what this is related to. Each commercial unit is entitled to individual contracts with their appointed EA approved waste provider and multiple vehicles for types of waste identified. This needs to be either reflected in the servicing trips or clarification on an agreement for a shared waste removal arrangement for the entire site needs to be set out for the commercial units and separately for residential. (This shared waste collection arrangement would be preferred to meet national and local transport target setting)

Response: As per the response to question 05, a Servicing and Maintenance Scheduling Plan will be prepared prior to occupation and will include revised frequencies once end uses are known (see also question 08).

Question 08: Could they include an insert and set out that a standalone Waste Strategy Document will be in the appendices and submitted to me as soon as feasible, and that a Servicing and Maintenance Scheduling Plan will be produced more than 6 weeks in advance of planned occupancy. (I would like a waste condition but if not it needs to be under the s106 clause as an appendix document approval)

Response: As per the response to questions 04 and 06/07, a Servicing and Maintenance Scheduling Plan will be prepared prior to occupation and will include routes, types, volumes and frequencies of collection once end uses are known and confirmed.

Question 09: I noted that there is a loading bay for residential waste that directly conflicts with disabled parking bays. Please determine and set out the times of agreed access on Georgiana street and whether there is suitable drop kerb facilitation for this. Consider any other environmental aspects parking regimes / control and tree cover and any nuisance representations for other neighbouring sites.

Response: Although the disabled bays are close to the bin store, there is sufficient space between the face of the building and the back of the parking bay (2.0m) to manoeuvre bins to a proposed drop kerb east of the parking bays. We have redesigned the layout of drop kerbs, visitor cycle parking and disabled bays in response to this and LBC's comments about tree retention on this street.

Question 10: Please determine how land on the site and fly litter capture for waste and recycling or waste dumping will be managed throughout the site and in areas that are adjacent to public managed highways or spaces.

Response: To be agreed through a public open space management plan

Question 11: Please ensure that there is a suitable indoor or outdoor designed structure / room to contain temporary bulky waste items, this is set out in the technical guidance and applies to both commercial and residential.

Response: In the current proposals, the residential bin stores contain space for bulky items – see response to question 01. Any specific requirements from LBC on physical segregation (e.g. by a low wall, by a high wall or by caging) will help with the detailed design of these spaces.

Question 12: Finally please consider the close proximity of the site to the river water ways, an immediate solution to freight transport congestion would be to adopt the current river recycling and waste transport systems for all waste produced and install a localised system for handling the transfer by segregated types of waste.

Response: Nothing contained in the proposals rules out the transport of waste from the site to the canal in the future if facilities become available.