

105 JUDD STREET

OPERATIONAL WASTE MANAGEMENT STRATEGY

PROJECT NO. 2480/2004 DOC NO. D012

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1 INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1 Velocity Transport Planning has been commissioned by 105 Judd Street Limited to prepare an Operational Waste Management Strategy (OWMS) for 105 Judd Street (hereafter referred to as the 'Proposed Development') situated in the London Borough of Camden (LBC) to accompany a detailed planning application for the refurbishment of an existing building to provide office and laboratory enabled workspace, with café area at ground level.

1.1.2 This OWMS considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage and collection of waste arising.

1.2 EXISTING SITE USE AND LOCATION

1.2.1 The site up until recently was used as the offices for the Royal National Institute of Blind People (RNIB). The site is bound by Hastings Street to the north, Judd Street to the east, residential buildings to the south and Thanet Street to the west. The site location is shown in Figure 1-1 below.

Figure 1-1 Site Location



1.3 PROPOSED DEVELOPMENT

1.3.1 The Proposed Development is described as follows:

“Partial demolition and erection of extension at part third floor, fourth floor, fifth floor and rooftop plant in connection with the ongoing use of the building for commercial, business and service uses (Class E); associated external alterations to the elevations, improvements to the public realm and



replacement of the existing ramp; roof terraces at levels three, four and five; provision of cycle parking, waste/recycling storage and other services; associated external alterations.”

1.4 DOCUMENT STRUCTURE

1.4.1 The report is set out in the following format:

- ⦿ Section 2: Waste Legislation, Policy, and Guidance – details of the national legislation and local waste policy that have relevance to the Proposed Development.
- ⦿ Section 3: Management of Commercial Waste – provides an estimate of commercial waste arising and outlines the plan which will be adopted to manage the waste arising from the Proposed Development once operational.
- ⦿ Section 4: Summary & Conclusions
- ⦿ Appendix A: National and Local Waste Policy & Guidance



2 WASTE LEGISLATION, POLICY & GUIDANCE

2.1 INTRODUCTION

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

2.2 NATIONAL LEGISLATION

- 2.2.1 A list of relevant items of national waste legislation is outlined below in reverse chronological order:
- 2.2.2 The Waste (Circular Economy) (Amendment) Regulations 2020 – these regulations came into force on 1 October 2020 and amended a raft of primary and secondary legislation on waste, to introduce a revised legislative framework to support the EU's Circular Economy Package (CEP) identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.
- 2.2.3 Waste Management, The Duty of Care Code of Practice (2020 update) - This code of practice replaces the 1996 Code and is pursuant to Section 34(9) of the Environmental Protection Act 1990. It sets out practical guidance on how to meet waste duty of care requirements and is admissible as evidence in legal proceedings i.e. its rules will be taken into account where relevant in any case based on breach of the duty of care.
- 2.2.4 The Waste (England and Wales) Regulations 2011 - Waste collection authorities must collect waste paper, metal, plastic, and glass separately. This legislation also imposes a duty on waste collection authorities, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
- 2.2.5 Environmental Protection Act 1990 - Part II of the Act was originally implemented by the Duty of Care Regulations 1991.

2.3 NATIONAL, LONDON & LOCAL WASTE POLICY

- 2.3.1 The relevant national, London and local waste policy reviewed during the preparation of this OWMS is outlined below and further detail is provided in APPENDIX A.
- ⊙ Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework* (2021);
 - ⊙ Department for Communities & Local Government (DCLG), *National Planning Policy for Waste* (2014);
 - ⊙ Department for Environment, Food and Rural Affairs (DEFRA), *Our Waste, Our Resources: A Strategy for England* (2018);
 - ⊙ DEFRA, *Waste Management Plan for England* (2021);
 - ⊙ HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment* (2018);
 - ⊙ Greater London Authority (GLA), *The London Plan 2021* (March 2021);
 - ⊙ GLA, *London Environment Strategy* (2018);



- ⊕ NLWA, *North London Waste Plan: Proposed Submission Plan* (January 2019);
- ⊕ LBC, *Local Plan* (2017);
- ⊕ LBC, *Waste Storage and Arrangement for Residential and Commercial Units (Supporting Document for Planning Guidance CGP1 Design Storage and Collection of Recycling and Waste)* (2014).



3 MANAGEMENT OF COMMERCIAL WASTE

3.1 INTRODUCTION

- 3.1.1 This section outlines the proposed strategy that will be used to manage the operational waste arising from the Proposed Development, which comprises of multiple levels of office and laboratory enabled space, with a café at ground level.
- 3.1.2 This waste strategy has been developed in accordance with standards detailed in LBC's 'Waste Storage and Arrangement for Residential and Commercial Units' guidance document (hereafter referred to as 'the Guidance') which was updated in 2014.

3.2 WASTE GENERATION MODELLING

- 3.2.1 LBC does not provide metrics for commercial waste generation. Waste generation metrics for the proposed commercial space have been sourced from British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice*.
- 3.2.2 Table 3-1 below details the metrics applied.

Table 3-1 Commercial Waste Metrics

Description	Waste Metric	Waste Composition	Assumptions
Restaurant	Volume per number of covers [75 litres] x number of covers	<ul style="list-style-type: none"> ⊙ 30% Residual Waste ⊙ 50% Dry-Mixed Recycling (DMR) ⊙ 20% Food Waste 	<ul style="list-style-type: none"> ⊙ 7-day Operations ⊙ 1 cover per 4m²
Office	Volume per number of employees [50 litres] x number of employees	<ul style="list-style-type: none"> ⊙ 35% Residual Waste ⊙ 60% DMR ⊙ 5% Food Waste 	<ul style="list-style-type: none"> ⊙ 5-day Operations ⊙ 1 employee per 8m²

Table 3-2 below summarises the commercial areas that form the Proposed Development.

Table 3-2 Commercial Area Schedule

Class Use	Commercial Use	NIA (m ²)
Class E	Office/Laboratory-Enabled Space	6,169
	Café	154
Total		6,323

- 3.2.3 Based on the waste generation metrics detailed in Table 3-1 and the commercial area schedule summarised in Table 3-2, Table 3-3 provides estimated levels of commercial waste arising from the Proposed Development once operational.



Table 3-3 Estimated Weekly Commercial Waste Generation

Commercial Area	Weekly Waste Generation (Litres)			Total
	Residual Waste	DMR	Food Waste	
Office / Laboratory Enabled Space	11,567	25,062	1,928	38,557
Café	578	963	385	1,926
Total	12,145	26,025	2,313	40,483

3.3 PROPOSED WASTE MANAGEMENT STRATEGY

3.3.1 The proposed strategy to manage commercial waste has been devised to provide a high-quality service to commercial tenants whilst also being compliant with the Guidance.

3.4 INTERNAL WASTE STORAGE

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

OFFICE/LABORATORY ENABLED SPACE

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

Figure 3-1 Example Cleaning Trolley¹



3.4.3 Using the goods lift and access corridors, the on-site FM team will transfer the segregated waste to the commercial waste store at ground-floor level.

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



CAFÉ

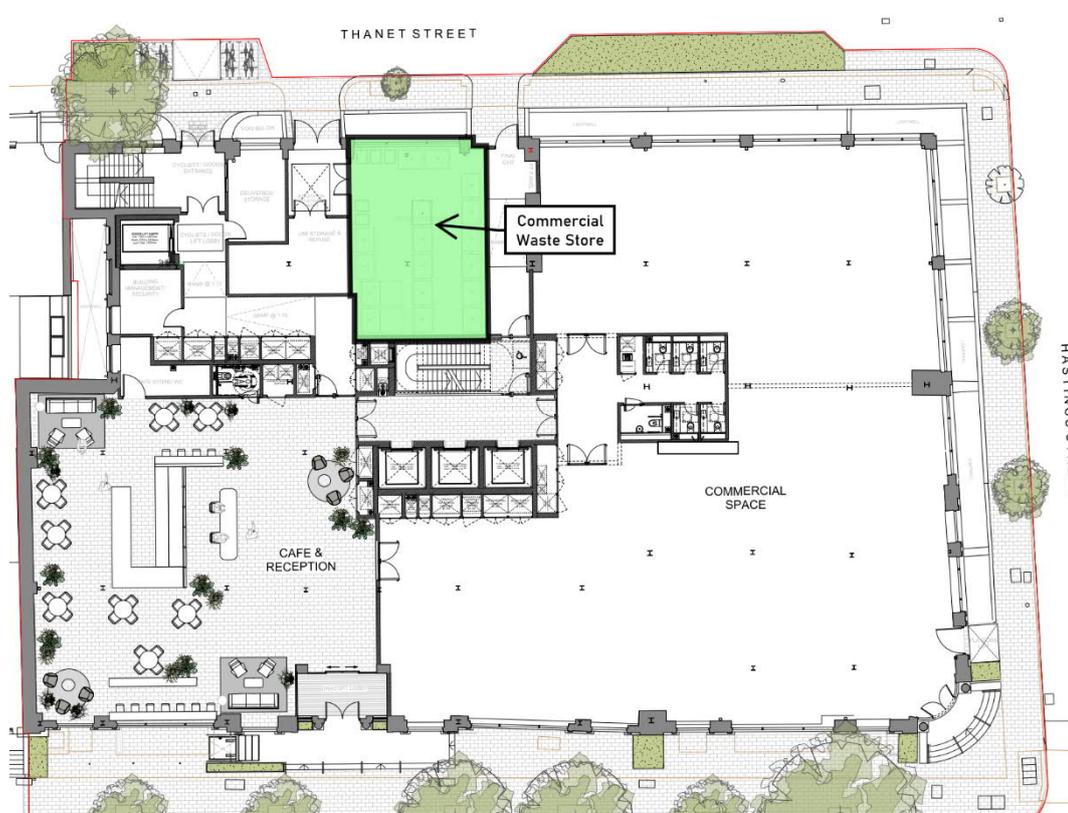
- 3.4.4 The tenants in the ground floor level café will transfer their segregated waste to the shared commercial waste store using the internal access corridors within the Proposed Development.

3.5 COMMERCIAL WASTE STORAGE

- 3.5.1 A shared commercial waste store has been provided at ground-floor level. This is the location that all residual waste, DMR and food waste generated within the Proposed Development will be stored prior to collection.

- 3.5.2 The location of the commercial waste store is shown in Figure 3-2 below.

Figure 3-2 Commercial Waste Store



- 3.5.3 Based on the estimated waste volumes outlined in Table 3-3, Table 3-4 summarises the number of bins required to provide sufficient waste storage capacity for the Proposed Development, assuming daily collections.

Table 3-4 Waste Container Provision (Daily Collections)

	Number of Containers		
	1,100-Litre Eurobins	DMR	240-Litre Wheeled Bins
Residual Waste			Food Waste
	5	10	4

- 3.5.4 As per the Guidance, a minimum of two days' waste storage has been provided as contingency, to account for operational issues.



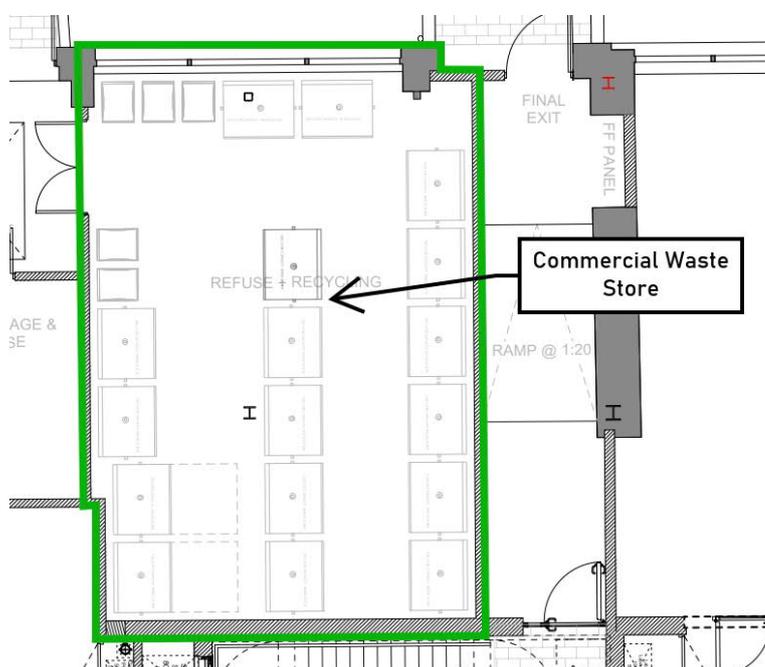
3.5.5 The commercial waste store will be sufficiently sized to accommodate the number and types of bins detailed in Table 3-4 above. Table 3-5 below summarises the dimensions of these bins.

Table 3-5 Container Dimensions

Container	Dimensions (mm)			Source
	Height	Width	Depth	
240-Litre Wheeled Bin	1,140	570	740	The Guidance
1,100-Litre Eurobin	1,300	1,340	1,000	

3.5.6 Figure 3-3 below shows the configuration of the ground-floor level commercial waste store.

Figure 3-3 Commercial Waste Store Configuration



3.5.1 The commercial waste store will be designed in accordance with British Standard BS5906:2005 *Waste Management in Buildings - Code of Practice*. In summary, the facilities should include the following:

- ⊙ A suitable waste point in close proximity to allow washing down;
- ⊙ All surfaces sealed with a suitable waterproof finish (vinyl, tiles etc.);
- ⊙ All surfaces easy to clean;
- ⊙ A suitable floor drain; and
- ⊙ Suitable lighting and ventilation.

3.6 WASTE COLLECTION

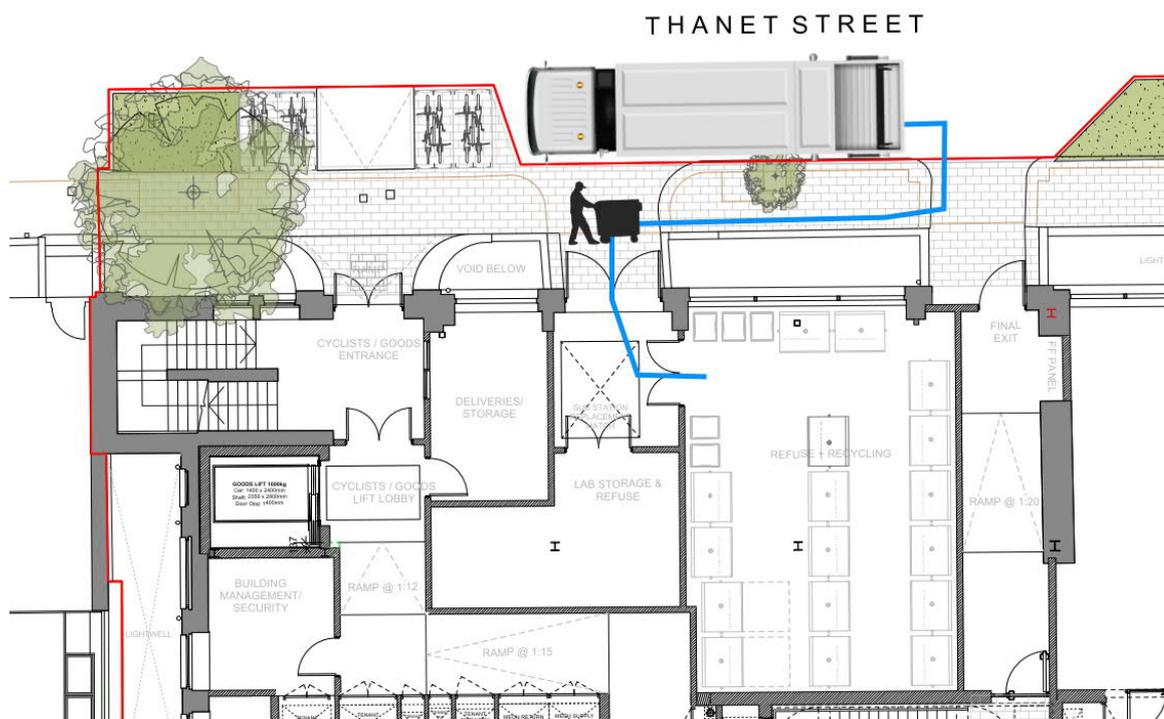
3.6.1 A commercial waste contractor will be appointed to collect the residual waste, DMR and food waste from the Proposed Development multiple times per week.

3.6.2 The Refuse Collection Vehicle (RCV) will stop on Thanet Street and the collection operatives access the bins directly from the commercial waste store.



3.6.3 An indicative loading position for the RCV and collection operative access route are shown in Figure 3-4 below.

Figure 3-4 RCV Loading and Collection Access



3.6.4 APPENDIX B includes swept path analysis for this manoeuvre.

3.6.5 As per BS5906:2005 the path to the collection vehicle will be:

- ⊙ Minimum width 2 metres;
- ⊙ Free from kerbs or steps;
- ⊙ Solid foundation; and
- ⊙ Suitably paved with a smooth continuous finish.

3.6.6 Once the bins have been emptied the collection operatives will return them to the commercial waste store.

3.7 CLINICAL WASTE

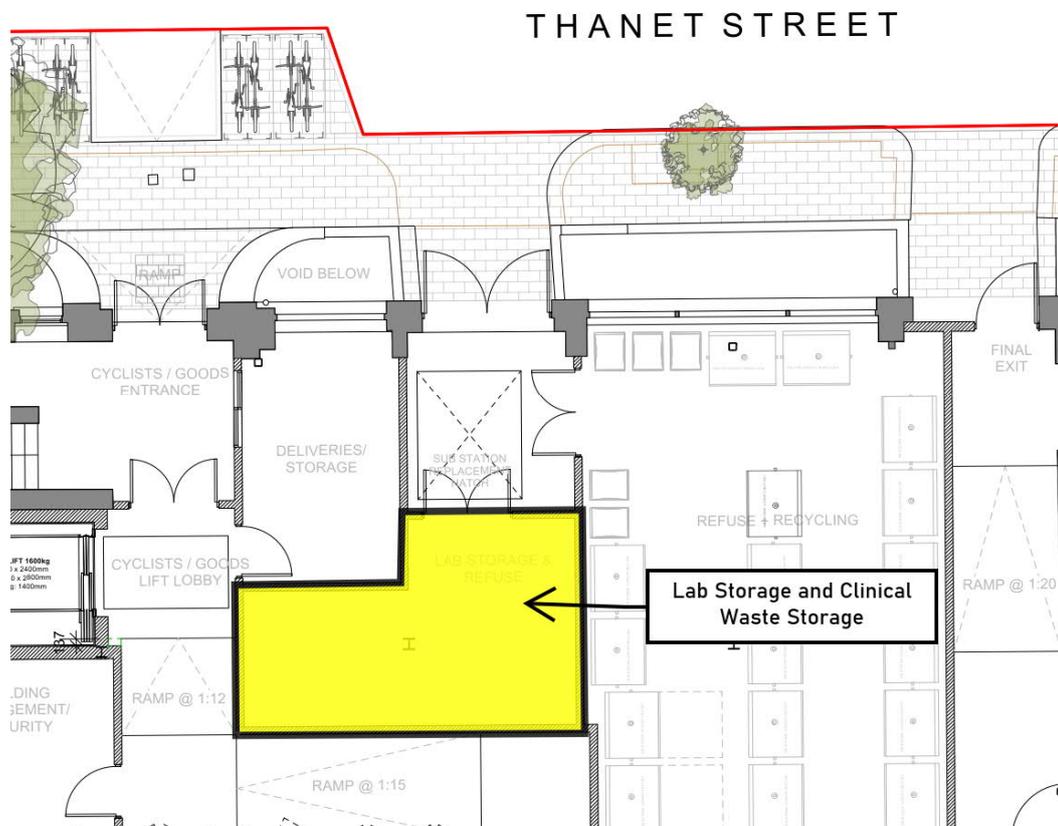
3.7.1 Should the Proposed Development operate as a laboratory, it would be expected that small volumes of clinical waste will be generated. It is not possible to provide an estimate for clinical waste, as the exact nature of the business practice will determine the volume and types generated.

3.7.2 Clinical waste will be stored separately in a secure storage area in accordance with all prevailing legislation.

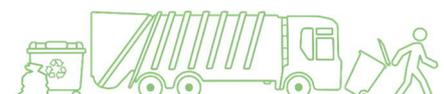
3.7.3 Figure 3-5 shows the location of the clinical waste storage facilities at the Proposed Development.



Figure 3-5 Clinical Waste Storage Area



- 3.7.4 The commercial tenant will be responsible for arranging a suitably licenced waste contractor to collect the clinical waste from the Proposed Development on an appropriate schedule.



4 SUMMARY AND CONCLUSION

4.1 SUMMARY

COMMERCIAL WASTE

- 4.1.1 Estimated waste generation for the Proposed Development once operational has been calculated using appropriate metrics extracted from British Standard BS5906:2005.
- 4.1.2 Waste will be segregated by the commercial tenants and stored temporarily within their tenanted areas.
- 4.1.3 All waste generated during the operational phase of the Proposed Development will be collected internally and transferred to a shared commercial waste store at ground floor level by the tenants or on-site FM team.
- 4.1.4 Residual waste and DMR will be stored in 1,100-litre Eurobins; food waste will be stored in 240-litre wheeled bins.
- 4.1.5 The commercial waste store will be designed to BS5906:2005 standards.
- 4.1.6 A commercial waste contractor will be appointed to collect each waste stream multiple times per week on an agreed schedule.
- 4.1.7 On collection days the commercial waste contractor will position their RCV on Thanet Street and collect the bins directly from the commercial waste store, returning them once emptied.

CLINICAL WASTE

- 4.1.8 Clinical waste will be stored separately in a secure storage facility in accordance with all prevailing legislation.
- 4.1.9 The commercial tenant will be responsible for arranging a suitably licenced waste contractor to collect the clinical waste from the Proposed Development on an appropriate schedule.

4.2 CONCLUSION

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



APPENDIX A

NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

NATIONAL WASTE POLICY

MHCLG, NATIONAL PLANNING POLICY FRAMEWORK (2021)²

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

DCLG, NATIONAL PLANNING POLICY FOR WASTE (2014)³

The National Planning Policy for Waste replaces 'Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS 10)' and is to be considered alongside other national planning policy for England - such as in the NPPF and the Waste Management Plan for England. As the primary focus is on planning for waste management facilities, it is not considered relevant to the Proposed Development.

DEFRA, OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND (2018)⁴

The strategy sets out how England will preserve the stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. At the same time, the country will minimise the damage caused to the natural environment by reducing and managing waste safely and carefully, and by tackling waste crime.

It combines actions the country will take now, with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. This is the blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity, and eliminating avoidable waste of all kinds by 2050.

DEFRA, WASTE MANAGEMENT PLAN FOR ENGLAND (2021)⁵

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

WASTE HIERARCHY

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

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

² DLUHC (2021) *National Planning Policy Framework*

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

³ MHCLG (2014) *National Planning Policy for Waste*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

⁵ <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

Figure A1.1: The Waste Hierarchy



The main principles of the Waste Hierarchy are:

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

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

HM GOVERNMENT, A GREEN FUTURE: OUR 25 YEAR PLAN TO IMPROVE THE ENVIRONMENT (2018)⁶

The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. Its aim is to deliver cleaner air and water in cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

With regard to waste management, the plan details aims which include:

- ⦿ Zero avoidable plastic waste by 2042;
- ⦿ Reduce food waste; and
- ⦿ Improving the management of residual waste.

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

LONDON WASTE POLICY & GUIDANCE

GLA, THE LONDON PLAN (MARCH 2021)⁷

The London Plan is the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The strategy includes the following waste management policy that has influenced the development of more specific business waste guidance:

'Policy D3 Optimising site capacity through the design-led approach

3.1B.18 Shared and easily accessible storage space supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.'

'Policy SI7 Reducing waste and supporting the circular economy

Resource conservation, waste reduction, increases in material re-use and recycling, and reduction in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

5) design developments with adequate, flexible and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.'

GLA, LONDON ENVIRONMENT STRATEGY (2018)⁸

The Mayor, with the new London Environment Strategy, aims to make London a zero-waste city. By 2026, no biodegradable or recyclable waste will be sent to landfill and by 2030, 65% of London's municipal waste will be recycled.

With regards to waste management within the Proposed Development, the following extracts are of relevance:

'To help them achieve the recycling targets, waste authorities should deliver the following minimum level of service for household recycling:

- ⦿ all properties with kerbside recycling collections to receive a separate weekly food waste collection
- ⦿ all properties to receive a collection of, at a minimum, the six main dry recycling materials, i.e. glass, cans, paper, card, plastic bottles and mixed rigid plastics (tubs, pots and trays)

Proposal 7.2.1.c The Mayor will support efforts to increase recycling rates in flats

The Mayor will encourage Resource London to provide more support and funding to those waste authorities that are working towards achieving higher recycling performance in flats. Through LWARB, the Mayor will seek additional funding to tackle recycling performance in flats. The London Plan requires that all new developments referred to the Mayor include adequate recycling storage for at least the six main dry recyclable materials and food.

⁷ GLA (2021) *The London Plan*

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

⁸ GLA (2018) *London Environment Strategy*

https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

Waste authorities, through the planning application process, should apply the waste management planning advice for flats, including the domestic rented sector, developed by LWARB in partnership with the London Environment Directors Network (LEDNET).'

LOCAL WASTE POLICY & GUIDANCE

NLWA, RESIDUAL WASTE REDUCTION PLAN (2020)

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

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

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

The NLWP has two main purposes:

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

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

LBC, LOCAL PLAN (2017)

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

'Policy CC5 Waste

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

We will:

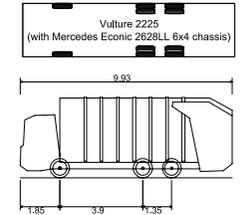
- a. aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;*
- b. deal with North London's waste by working with our partner boroughs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

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

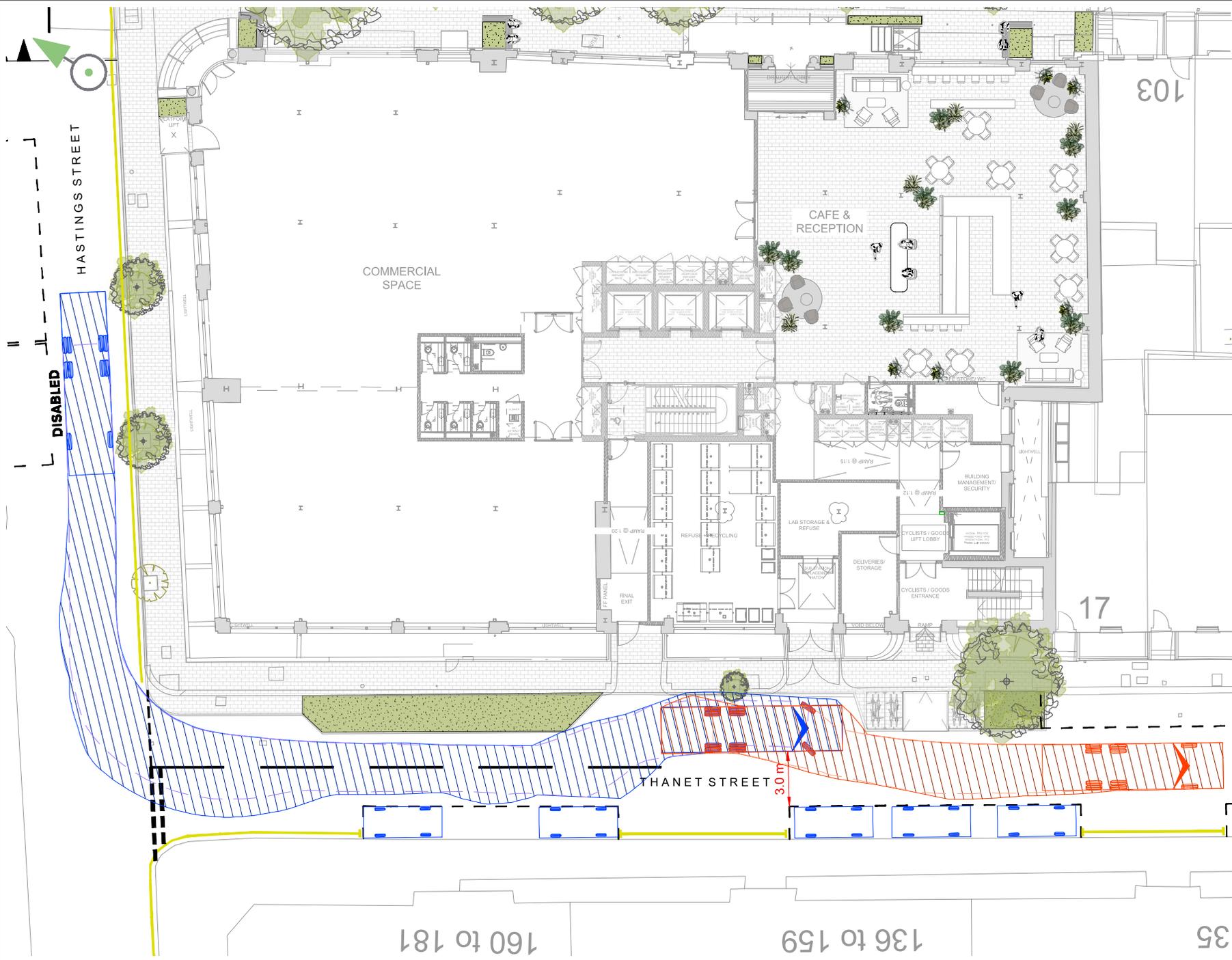
Its key aim is to assist those involved in the design and management of buildings to best provide for the temporary storage and transfer of wastes to maximise the type and amounts that can be reused or sent for recycling or repurpose.

APPENDIX B

SWEPT PATH ANALYSIS



Vulture 2225
(with Mercedes Econic 2628LL 6x4 chassis)
Overall Length 9,930m
Overall Width 2,490m
Overall Body Height 3,749m
Min Body Ground Clearance 0,302m
Track Width 2,490m
Lock to lock time 4,00s
Wall to Wall Turning Radius 9,100m



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PROJECT
105 JUDD STREET

DRAWING TITLE
**PROPOSED HIGHWAY WORKS
SWEPT PATH ANALYSIS - REFUSE VEHICLE**



