

## LAWNMIST LTD

88 & 100 GRAYS INN ROAD / 127 CLERKENWELL ROAD, LONDON, WCIX.

## SITE WASTE MANAGEMENT PLAN

September 2022

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#### I.0 INTRODUCTION

- 1.1 Lawnmist Ltd is currently seeking planning consent relating to proposed development at 88 &100 Grays Inn Road / 127 Clerkenwell Road, London, WCIX.
- 1.2 The local planning and highways authority is the London Borough of Camden.
- 1.3 The proposed development comprises:
  - 88 Grays Inn Road: Proposed refurbishment of warehouse building to provide high quality affordable housing & affordable workspace
  - 100 Grays Inn Road: Proposed demolition of 1960's office block, proposed new building to provide best in class office and retail space
  - 127 Clerkenwell Road: Proposed demolition of 1980's office block, proposed new building to provide best in class office space
- 1.4 The development at 88 Grays Inn Road and 127 Clerkenwell Road will be supplemented by a service vehicle access from Grays Inn Road with refuse stores provided at ground and basement levels. Relevant proposed site layouts are shown in Appendix A.
- 1.5 The following chapters set out the policy context of Waste Management Plans, the forecast waste arisings from the site and how waste storage and collection arrangements will be managed.

#### 2.0 POLICY ASSESSMENT

2.1 This chapter sets out the requirements of polices relevant to waste management.

Camden Local Plan 2017, London Borough of Camden (2017)

2.2 Policy CC5 Waste sets out that:

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.
- 2.3 The supporting text goes on to set out that:

To make sure that residents and businesses can properly store and sort their waste and to make household recycling as easy as possible, the Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste... Our supplementary planning document Camden Planning Guidance on design contains further information on the Council's expectations for on-site facilities for waste and recycling and on construction waste.

To ensure an integrated approach to waste management and the highest possible reuse and recycling rates, the Council will encourage the submission of a site waste management plan prior to construction. For further details please refer to our supplementary planning document Camden Planning Guidance on sustainability.

Camden Planning Guidance: Transport, London Borough of Camden (January 2021)

2.4 The Council's planning guidance on Transport includes the text extract below;

Developments that have demonstrated a significant movement of goods or materials by road in the Transport Assessment (typically major developments or those where the floor area exceeds the thresholds set out in Appendix A of this guidance) will be expected to accommodate goods and service vehicles on site. This also includes provision for waste collection vehicles should it be demonstrated that they require onsite access (see CPG: Waste for information). Accommodating servicing and delivery vehicles on-site should also take into account the guidance on vehicular access in Section 7 of this CPG.

Camden Planning Guidance: Waste Storage and Arrangements for Residential and Commercial Units, London Borough of Camden (December 2018)

2.5 The key message of the Councils Waste Planning Guidance is that;

Planning for all waste and storage should ensure that;

- adequate space is designed for the containment, storage and transfer of all wastes e.g. recyclables, food waste, general waste and bulky waste;
- allows for reasonable changes to collection services and transferor activities in the future
- safe storage locations and systems for waste transfer are accessible for all users, collectors and minimise nuisance to occupiers and neighbours and their amenity space, e.g. noise, obstruction, odours, pests, etc.;
- access for all waste transfer activities is well designed;
- waste containers should have designated indoor or external storage areas;
- facilities sensitively designed/located, especially in conservation areas/or listed buildings; and
- plans are documented within a waste strategy and design and access statement to meet planning waste conditions for approval

Camden Planning Guidance: Design, London Borough of Camden (January 2021)

2.6 The key message of Chapter 8 of the Councils Design Planning Guidance is that;

Developers should ensure that all waste systems and storage areas in new developments or refurbished developments are:

- designed to provide adequate space for the temporary storage of all types of waste, including internal storage areas with sufficient space for the separation of temporary storage of all recycling, food waste and residual waste;
- sensitively designed and located in relation to the local environment especially in conservation areas and listed buildings;
- safely located and accessible for all users, including waste contractors, and designed to minimise nuisance to occupiers and neighbours and their amenity;
- sufficiently flexible to accommodate future increases in recycling targets;
- designed to include where appropriate, innovative waste management solutions that increase efficiency and help meet and exceed recycling and other waste reduction targets.

London Plan, The Mayor of London (March 2021)

- 2.7 Policy SI 7 of the London Plan relates to Reducing Waste and Supporting the Circular Economy and includes the following requirements;
  - 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.
- adequate and easily accessible storage space and collection systems to support recycling and re-use
- 2.8 In preparing this Site Waste Management Plan and the waste facilities and arrangements at the development site, the policy and guidance set out above has been taken in to account.

#### 3.0 WASTE CAPACITY ASSESSMENT & DESIGN

3.1 This chapter sets out details of the waste capacity assessment and bin store design for the proposed development based on the proposed development detailed in Table 1.

Table 1. Proposed Development

	No.88 Grays Inn Road	No.100 Grays Inn Road & 127 Clerkenwell Road
Affordable Housing (1 bed 2 person)	2 units	-
Affordable Housing (2 bed 4 person)	2 units	-
Affordable Housing (3 bed 4/5 person)	2 units	-
Affordable Workspace	335sqm	-
Office	-	8,497sqm
Retail	-	262sqm

Source: Piercy & Co 17/08/22

#### Waste Capacity Assessment

#### No.88 Grays Inn Road

- 3.2 For the proposed residential element of the scheme at No. 88 Grays Inn Road, metrics for communal residential properties in Camden Planning Guidance: Waste Storage and Arrangements for Residential and Commercial Units, London Borough of Camden (December 2018) detail that each dwelling (up to 3 bedrooms) could generate;
  - 140L of mixed recycling
  - 23L of food waste
  - 120L of general waste
- 3.3 For the proposed residential element (6 units), the total weekly arisings would be;
  - 840L of mixed recycling
  - 138L of food waste
  - 720L of general waste
- 3.4 The ground floor layout for 88 Grays Inn Road (Appendix A) shows that bin provision for the residential element will be made adjacent to the residential entrance with a single bin for mixed recycling, another for general waste and a food waste bin.
- 3.5 For the proposed affordable workspace element at No.88 Grays Inn Road, the Camden Planning Guidance refers to the Council's Technical Guidance with regards commercial waste. Para 5.16 of the Technical Guidance sets out that "Commercial waste arising's are calculated based on the industry type for each unit and planned assumptions for weekly waste production based on metres or sq. footage." The Technical Guidance does not provide metrics for calculating commercial waste arisings.

- In lieu of this, other sources of metrics for commercial waste arisings have been examined. BS 5906 'Waste Management in Buildings Code of Practice (BSI, 2005) is 15 years old and 'national' and in the 15 years since the BS standards, offices tend to be more 'paper-free'. As such more recent and local standards have been researched. Westminster City Council's 'Recycling and Waste Storage Requirements' (2021) are up to date and specific to central London offices and hence are considered to better would reflect current office waste generation than BS 5906 standards
- 3.7 Based on the waste storage guidance published by Westminster City Council, office developments are forecast to require a weekly capacity for waste arisings of 2,000 litres per I,000sqm (GFA).
- 3.8 On this basis the affordable workspace at No.88 Grays Inn Road (335sqm) could generate 678 litres of waste per week. In line with Westminster City Council guidance, it is proposed that 70% of commercial waste storage is provided for recyclable waste.
- 3.9 An office refuse store room is proposed at basement level at No.88 Grays Inn Road, as shown in Appendix A, which will accommodate waste from the affordable workspace element of the scheme by means of a single general waste and a recycling bin.

## No.100 Grays Inn Road & 127 Clerkenwell Road

- 3.10 For the proposed office space at No.100 Grays Inn Road and No.127 Clerkenwell Road, the Westminster City Council office waste arising metric has again been used. Based on the proposed office provision of 8,497sqm across the combined development, the weekly waste arising would be just under 17,000 litres per week. Again, it is proposed that 70% of commercial waste storage is provided for recyclable waste.
- 3.11 For the proposed retail element at No.100 Grays Inn Road and No.127 Clerkenwell Road, the Westminster City Council guidance has again been used as Camden's Technical Guidance does not detail retail waste arising metrics. The Westminster guidance suggests retail generates 4,000 litres of waste per week per 1,000sqm.
- 3.12 Based on the proposed retail provision of 262sqm and the Westminster guidance, the weekly waste arising would be 1,048 litres per week. Again, it is proposed that 70% of commercial waste storage is provided for recyclable waste.
- 3.13 As shown in Appendix A, a service yard will be provided for No.100 Grays Inn Road and No.127 Clerkenwell Road which will accommodate 15 x recycling bins, 2 x general waste bins, 6 x food waste bins, 1 x WEE bin along with a compactor and baler. This level of provision will accommodate the combined arisings from the proposed office and retail elements of the scheme.

## Waste Storage Location, Design & Construction

- 3.14 Proposed site layouts showing the location of bin stores are shown in Appendix A. It is noted that bin store areas are within the curtilage of the site with gated access from Grays Inn Road. As such, bin store areas will be secure.
- 3.15 Bin stores have been designed in accordance with industry standard guidelines, namely BS 5906:2005 Waste Management in Buildings Code of Practice (BSI, 2005) and relevant London Borough of Camden guidance.
- 3.16 Access to bin stores will be via doors with ventilation as required.
- 3.17 Within bin store areas there will be no pipes or services, and as such rubber buffers will not be required. The walls of the bin store will be of metal finish, while the floor will be concrete with a smooth texture which are non-porous, resistant and easy to clean.
- 3.18 The floor of the bin store areas for No.100 Grays Inn Road and No.127 Clerkenwell Road will be provided with dedicated drain points for washing down.
- 3.19 As there will be a level difference between the floor of the bin store for No.100 Grays Inn Road and No.127 Clerkenwell Road and the service yard from where collection will take place, there will be a platform lift to accommodate the level difference.
- 3.20 The bin store areas will be brightly lit, in over-looked positions, close to areas of activity to help avoid fly-tipping and anti-social behaviour, although this is unlikely to be an issue as the bin store areas will be within the secure curtilage of the site.
- 3.21 Storage areas for refuse and recycling bins will be clearly identifiable through the use of appropriate signage on doors or walls. There will be separate signage for recycling and refuse for all bin storage areas. The signage will promote recycling, and outline what goes in each of the bins.
- 3.22 The bin stores will provide adequate space for bins to be suitably housed with the front (long) side of each bin being accessible by staff and will allow each bin to be moved independently.

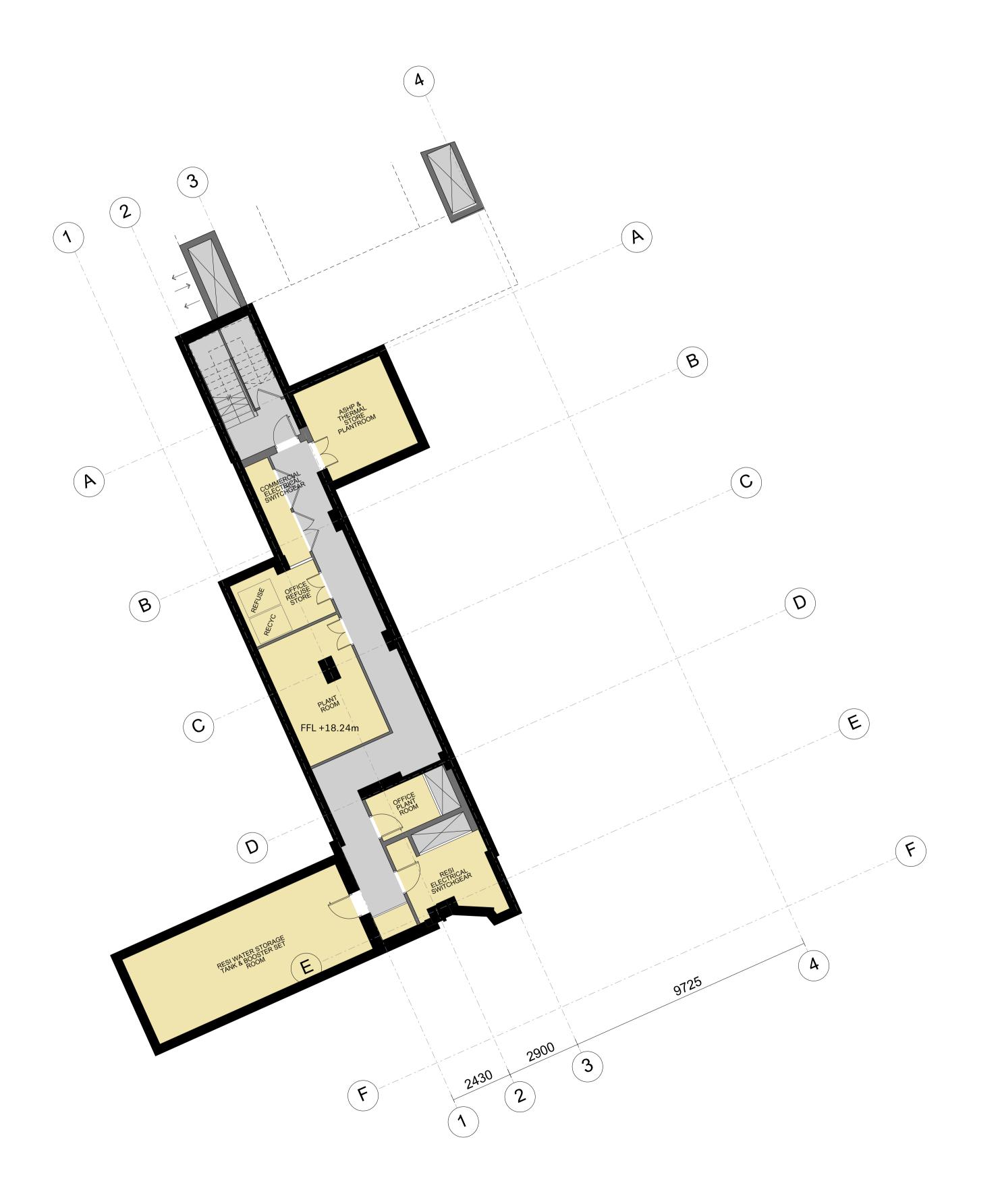
#### 4.0 WASTE COLLECTION ARRANGEMENTS

- 4.1 For No.88 Grays Inn Road, residential waste will be collected by the Council's residential waste contractor in line with current residential waste collections on Grays Inn Road.
- 4.2 Bins will be moved prior to collection to a location from where waste can be collected by Council contractor in line with the 10m maximum distance as set out in the Council's Planning Guidance.
- 4.3 This arrangement is considered acceptable and in line with Para 8.15 of the Council's Planning Guidance sets out that "Kerbside collection is generally appropriate for single-family homes, smaller developments of flatted properties, small cul-de-sacs, flats above and below shops, and live-work properties".
- 4.4 For the affordable workspace element of No.88 Grays Inn Road, sacked waste will be presented at the kerbside prior to collection by existing Council commercial waste collections. An arrangement will be entered in to with the Council to provide this service.
- 4.5 With regards waste collection for No.100 Grays Inn Road / 127 Clerkenwell Road, this will be collected via the on-site service yard accessed from Grays Inn Road and will be carried out by a private refuse contractor.
- 4.6 The service yard will feature an 8.0m diameter turntable which will allow the refuse vehicle (and other suitably sized service vehicles) to enter and leave the site in forward gears.
- 4.7 Under the contract with the private refuse contractor, building management can specify the size of vehicle used to collect refuse, such that it would be no bigger than the largest required vehicle that can access and egress the site's service yard.
- 4.8 Appendix B shows swept path analysis for a small refuse vehicle entering and exiting the site and taking up position on the turntable.

#### 5.0 SUMMARY & CONCLUSIONS

- 5.1 Site management is committed to implementing a safe and effective Site Waste Management Plan which seek to minimise refuse service trips relating to the development and adheres to the requirements of the Borough's guidance.
- 5.2 Bin stores will be located as shown in Appendix A.
- 5.3 The design and construction of bin stores will conform with industry standard and local design guidelines.
- 5.4 Swept path analysis demonstrates refuse collection vehicles can access and egress the service yard for No.100 Grays Inn Road / No.127 Clerkenwell Road.
- 5.5 Waste collection for No.88 Grays Inn Road will be carried out by Council residential / commercial waste contractors, with waste collection for No.100 Grays Inn Road / No.127 Clerkenwell Road being carried out by a private contractor under contract from the building management company.

Appendix A Proposed Site Layouts



Notes
This drawing is copyright Piercy&Company.
Do not scale from this drawing.
All dimensions and levels to be checked on site by the contractor

All dimensions and levels to be checked on site by the contracto and such dimensions to be his responsibility.

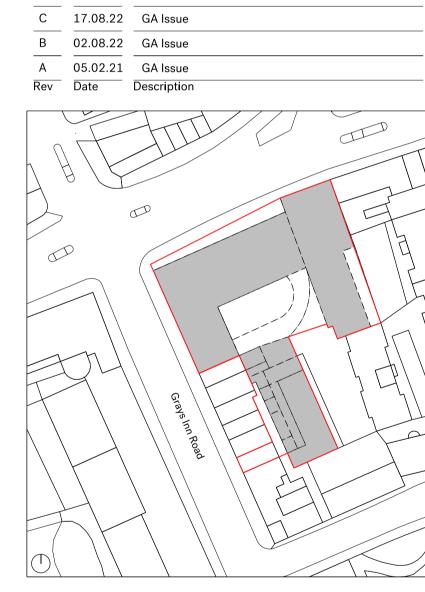
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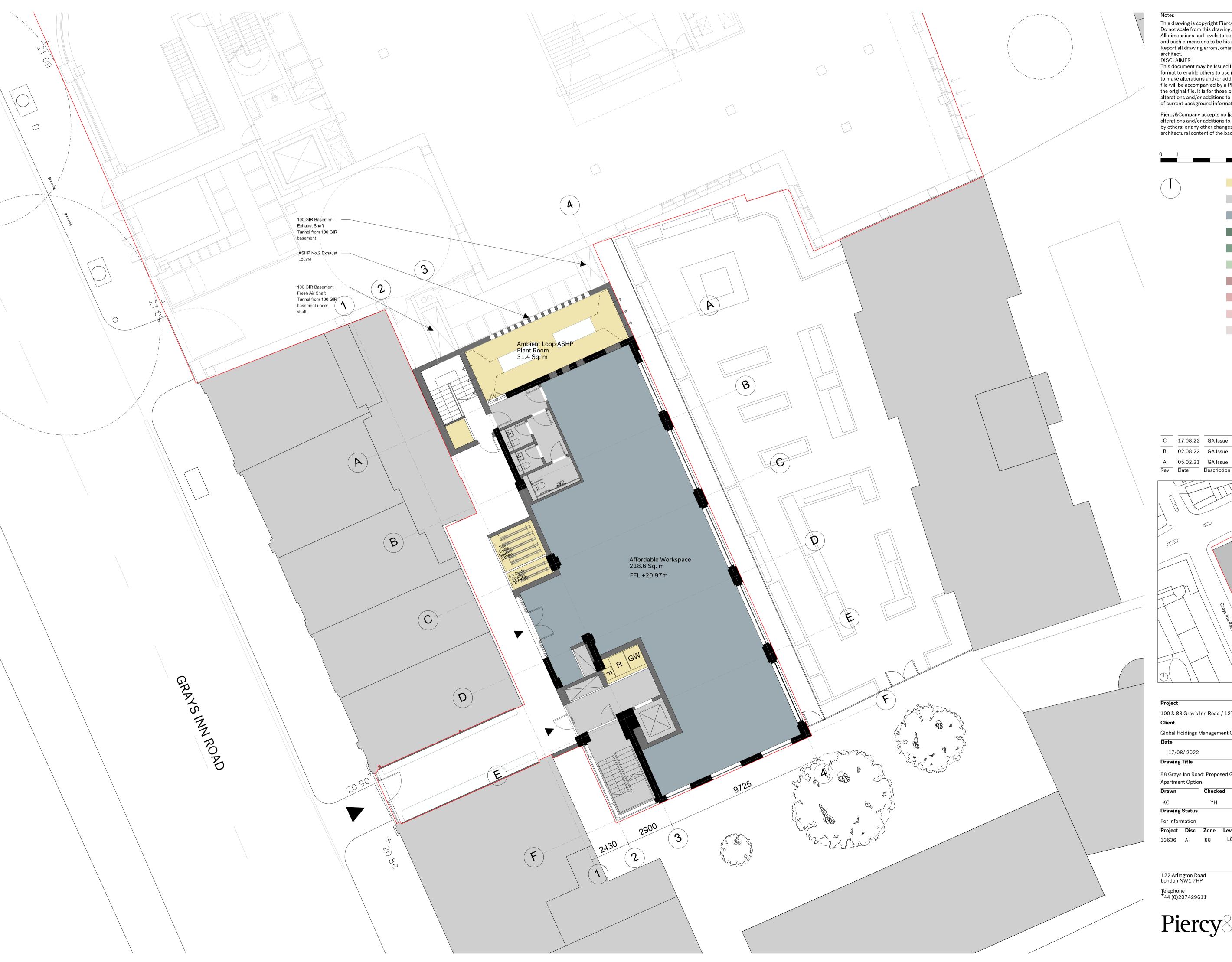


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122 Arlington Road London NW1 7HP Telephone †44 (0)207429611

www.piercyandco.com

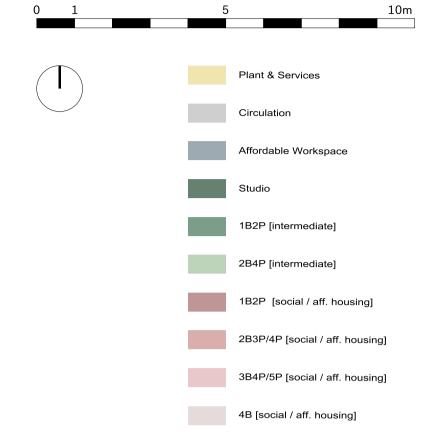
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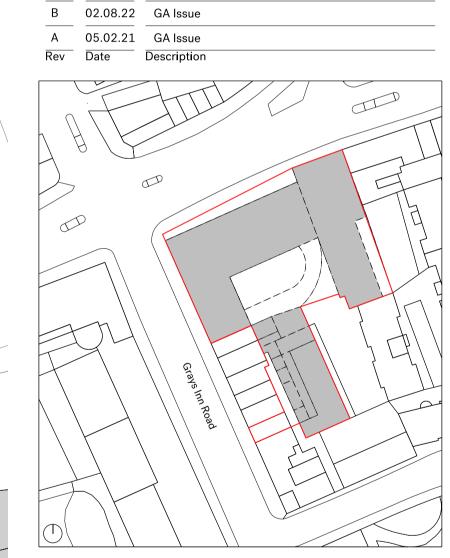


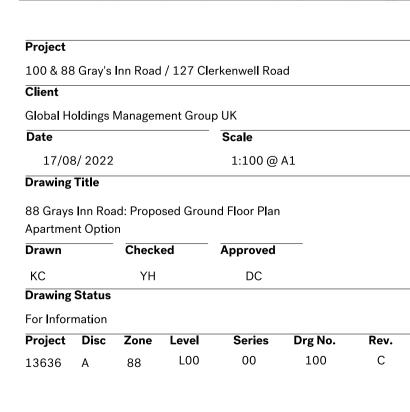
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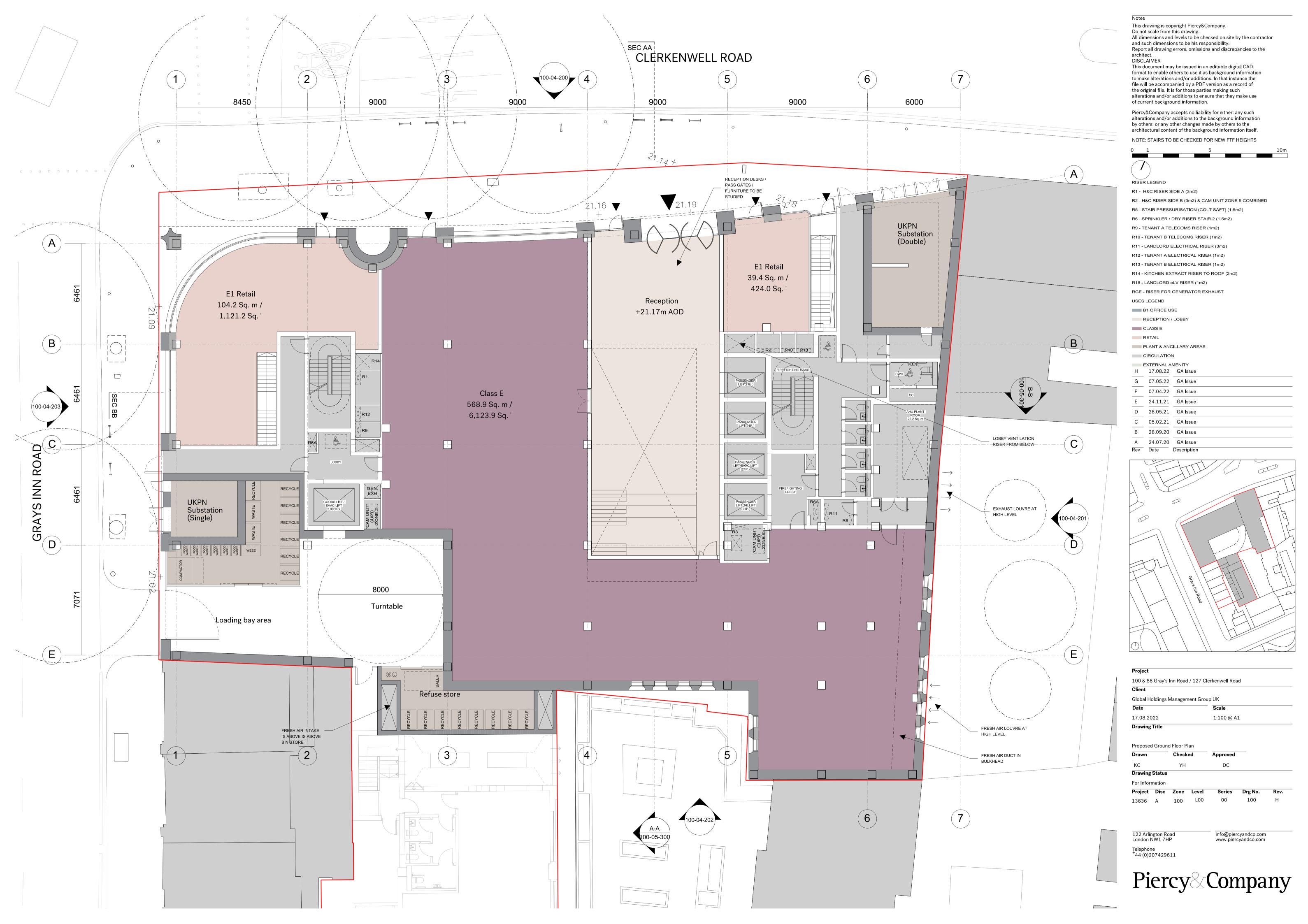




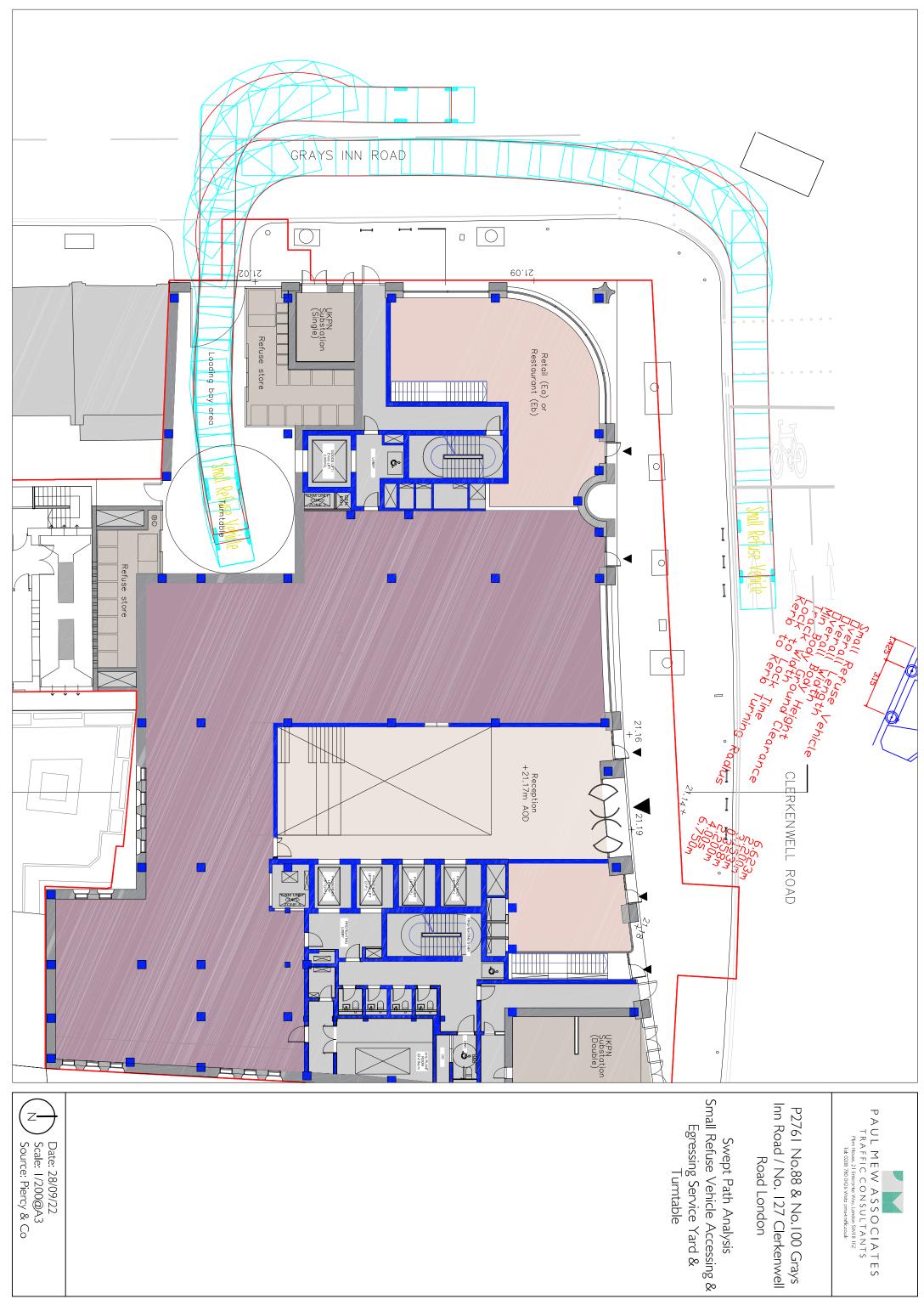


info@piercyandco.com www.piercyandco.com

Piercy Company



Appendix B Swept Path Analysis



Date: 28/09/22 Scale: 1/200@A3 Source: Piercy & Co

PAUL MEW ASSOCIATES

TRAFFIC CONSULTANTS

Plym House, 21 Enterprise Way, London SW18 IFZ

Tet 0208 780 0426 Weets pma-trafficzoak

Road London