EUSTON TOWER

Operational Waste Management Strategy

December 2023

British Land

EUSTON TOWER

OPERATIONAL WASTE MANAGEMENT STRATEGY

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1 INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1 This Operational Waste Management Strategy (OWMS) has been prepared by Velocity Transport Planning, on behalf of British Land Property Management Limited (Thereafter British Land) to support a planning application for the redevelopment of Euston Tower (hereafter referred to as the 'Proposed Development') within the London Borough of Camden (LBC).

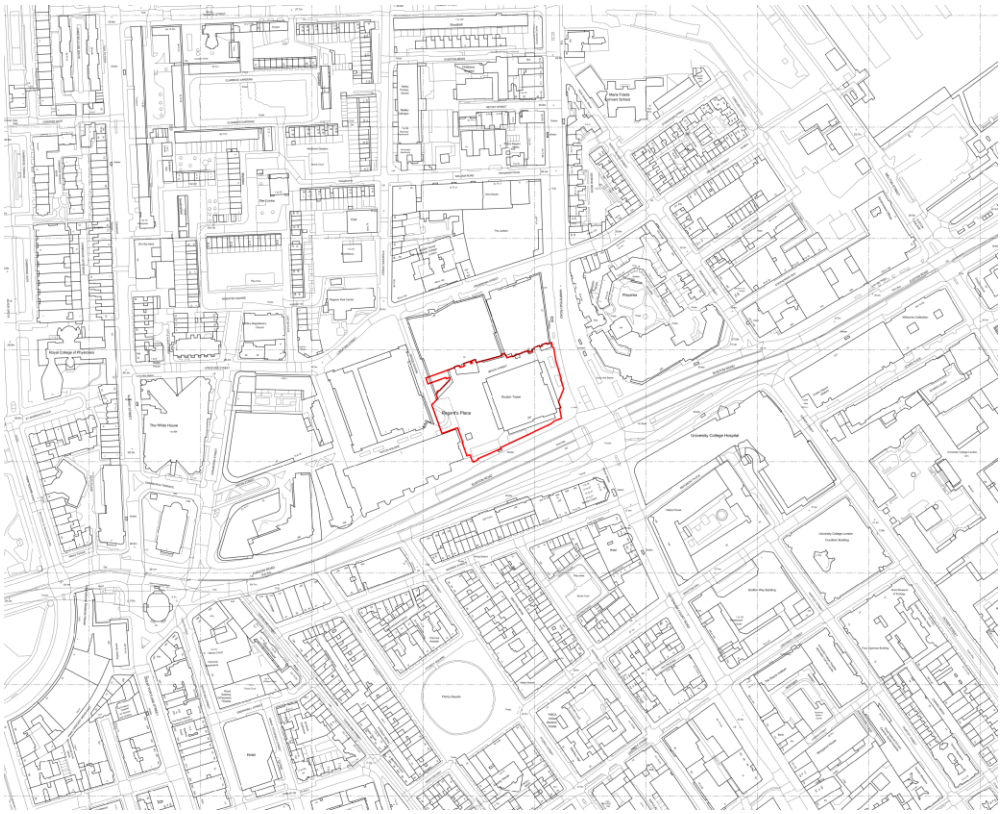
1.1.2 This OWMS considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage, and collection of waste arising.

1.2 SITE LOCATION

1.2.1 Euston Tower is bounded to the north by Brock Street, a private pedestrianised area within Regent's Place; to the east, the site is bounded by Hampstead Road (A400) and to the south by Euston Road (A501), both form part of the Transport for London Road Network (TLRN); and west by Regent's Place Plaza, which is also a private pedestrianised area within Regent's Place.

1.2.2 The site location is shown in **Figure 1-1** below.

Figure 1-1 Site Location



1.3 EXISTING SITE

1.3.1 Euston Tower is a 36-storey tall building standing on the northern edge of central London, situated in the south-west of the London Borough of Camden.

1.3.2 Located on the corner of Euston and Hampstead Road, at the top of Tottenham Court Road the tower shares a busy intersection with The UCL Hospital campus and is directly opposite Warren Street Station. The current tower has a prominent presence, given its status as the tallest building in the borough aside from the nearby BT Tower, and as such acts as a physical landmark for London Euston, Euston Square and Warren Street stations as well as wayfinding for the wider neighbourhood.

1.3.3 Completed in 1970, Euston Tower is designed in the 'International Style'. Above a two-storey extruded glazed podium, the tower has a pinwheel plan clad in aluminium curtain walling with green reflective tinted glazing. It was designed as an office building to provide cellular office accommodation typical of the period and formed part of a wider masterplan known as The Euston Centre. It now stands on the eastern edge of the pedestrianised Regent's Place Estate.

1.3.4 Since its completion, it has undergone a small refurbishment to but beyond this its external form and façade remain as originally constructed. These elements of the building are in a generally poor condition, due to a combination of wear in use and the quality of the original detailing. Gradually it has been vacated, and since 2021, with the exception of the retail at grade level, the building is entirely disused.

1.4 PROPOSED DEVELOPMENT

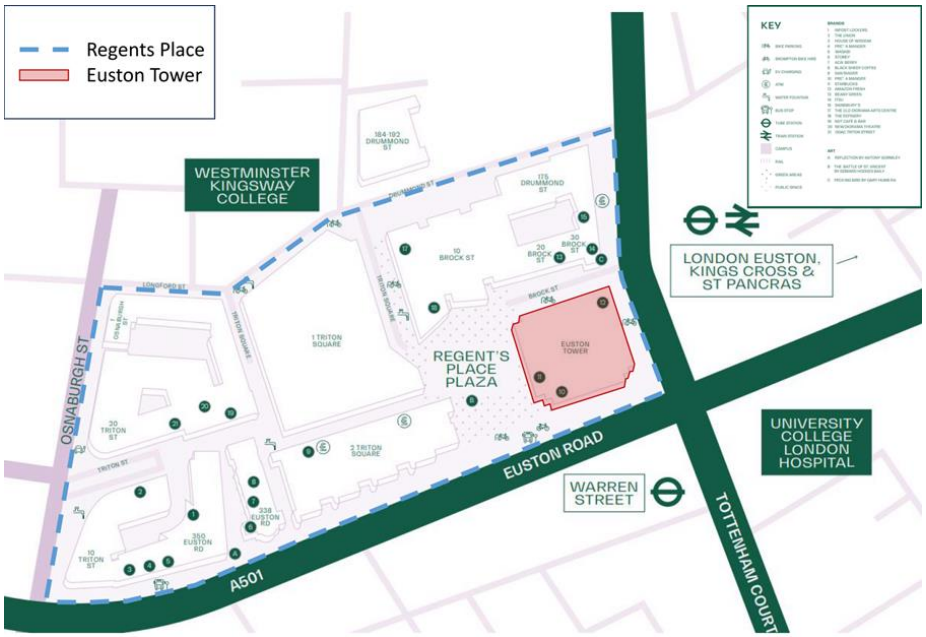
1.4.1 This OWMS has been prepared in support of an application at Euston Tower, 286 Euston Road, London, NW1 3DP.

1.4.2 Full planning permission for the following development:

> *"Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works."*

1.4.3 **Figure 1-2** below shows Regent's Place and the location of the Proposed Development within the plaza.

Figure 1-2 Regent's Place Plaza



1.5 DOCUMENT STRUCTURE

1.5.1 This 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 waste arising from the commercial uses 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 incorporated into UK domestic legislation.

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 AND GUIDANCE

2.2.1 A list of relevant national waste legislation is outlined below in reverse chronological order:

2.2.2 **The Environment Act 2021 –** The UK's new framework of environmental protection covering air quality, water, biodiversity and resource efficiency/waste reduction. Part 3 of the Act introduces measures which ensure all organisations across England, including local authorities, collect food waste separately from general waste.

2.2.3 **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.

2.2.4 **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.

2.2.5 **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.

2.3 ENVIRONMENTAL PROTECTION ACT 1990 – A FUNDAMENTAL STATUTE WHICH ESTABLISHES THE STRUCTURE AND AUTHORITY FOR WASTE COLLECTION. LOCAL AUTHORITIES ARE TASKED WITH THE COLLECTION OF HOUSEHOLD WASTE UNDER SECTION 45, WHILE BUSINESSES HAVE A DUTY OF CARE FOR THE DISPOSAL OF COMMERCIAL WASTE UNDER SECTION 34. PART II OF THE ACT WAS ORIGINALLY IMPLEMENTED BY THE DUTY OF CARE REGULATIONS 1991. 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**.

- Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework* (2023);

- 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);
- 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);
- LBC, Camden Planning Guidance: Design (January 2021);
- LBC, Camden Planning Guidance: Transport (January 2021); and
- LBC, Euston Area Plan (January 2015).

2.4 CIRCULAR ECONOMY CONSIDERATIONS

2.4.1 The following section outlines how the OWMS will address requirements listed Section 4.8.2 of the London Plan Guidance Document on Circular Economy Statements[1].

2.4.2 As this OWMS will be appended to the Circular Economy Statement, it will be required to demonstrate:

- The Quantity of operational and municipal waste the Proposed Development is expected to generate;
- How and were operational waste will be managed in accordance with the *Waste Hierarchy;*
- that the proposed development supports the separate collection of DMR (at least card, paper, mixed plastics, metals and glass), food waste and other waste;
- How operational performance will be monitored and reported; and
- That measures such as consolidated, smart logistics and community-led waste minimisation schemes have been explored.

2.4.3 Additional information related to the *Waste Hierarchy* and other prevailing guidance mentioned in this section can be found in APPENDIX A.

[1] GLA (2022) *London Plan Guidance: Circular Economy Statements*
https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

MANAGEMENT OF MUNICIPAL WASTE

2.4.4 Once operational, waste will be managed in accordance with the *Waste Hierarchy*.

2.4.5 The *London Plan* Policy SI 7 target will be targeted, which involves 65% of any municipal waste to be recycled by 2030.

2.4.6 The target set in the *London Environment Strategy* expects 75% business waste recycling by 2030 will be targeted.

2.4.7 Once operational, waste within the proposed Development will be separated and temporarily stored into the following waste streams:

- Residual waste;
- Dry Mixed Recycling (DMR);
- Food waste; and
- Glass waste

2.4.8 DEFRA's latest announcement for *Simpler Recycling Collections*[2] suggests that a requirement for households and businesses to split DMR into separate waste streams (cardboard, paper, mixed plastics, or metals) remains unlikely for the foreseeable future. In the event that prevailing legislation makes this necessary, as the overall waste storage capacity would not increase (only the number of separate waste streams) the commercial waste store could be configured to accommodate further waste stream segregation.

OPERATIONAL WASTE REPORTING

2.4.9 Estimated annual operational waste will be included in the Recycling Waste and Reporting table of the Circular Economy Statement. As a minimum, a commitment will be made to match municipal waste recycling rates with the London Plan Policy target of 65 per cent recycling by 2030.

2.4.10 The developer and the appointed waste collection contractor will be responsible for all operational waste reporting for the Proposed Development, as per in the Circular Economy Statement Guidance.

2.4.11 The responsibility of reporting on the final destination of waste streams will fall on the waste collection contractor, appointed to service the Proposed Development once operational.

[2] https://www.gov.uk/government/news/simpler-recycling-collections-and-tougher-regulation-to-reform-waste-system

This reporting will be based either on number of container lifts per waste stream, or collection weight data if available. Data requirements and reporting methods will be agreed with the relevant authorities once all elements are occupied.SMART LOGISTICS & WASTE MINIMISATION

2.4.12 As per the requirements set out in the Circular Economy Statements guidance, it is anticipated community-led waste minimising initiatives will be explored, such as a charity partnership for the collection of items such as ink cartridges or unused IT equipment. Additionally, the introduction of food caddies to each tenanted area can help to capture separate food waste. The developer and waste contractor will be encouraged to engage with tenants upon occupation, to ensure they are aware of how to minimise their waste. These measures may include guidance on how to reduce avoidable food waste and minimise the use of single use items.

3 MANAGEMENT OF COMMERCIAL WASTE

3.1 INTRODUCTION

3.1.1 This section outlines the waste management strategy that will be used to manage the operational waste arising from the Proposed Development.

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 BS5906:2005 does not include a dedicated metric for estimating waste generated by life science developments and learning spaces.

3.2.3 To maintain a robust waste strategy the office metric will be applied to the life science areas as it is anticipated that they would generate less waste than a typical office development. Lab spaces typically have lower employee density and additional space for hazardous and specialist waste streams will be provided, supplementary to the storage requirements for municipal waste.

3.2.4 The Office metric has also been applied to the learning and community spaces (Class F1). This class use constitutes a minor portion of the total commercial area which would not justify the application of a bespoke waste metric.The Food and Beverage metric has been applied to all Flexible Class E space as a contingency, as it has the most onerous waste storage requirements.

3.2.5 The weekly commercial waste metrics are summarised in **Table 3-1** below.

Table 3-1 Weekly Waste Metrics

Description	Waste Metric	Waste Composition	Assumptions
Office	Volume per number of employees [50 litres] x number of employees	• Residual Waste 25% • Dry-Mixed Recycling (DMR) 70% • Food Waste 4% • Glass Waste 1%	• 5-day Operations • 1 Employee per 8m²
Food and Beverage (F&B)	Volume per number of covers [75 litres] x number of covers	• Residual Waste 25% • Dry-Mixed Recycling (DMR) 65% • Food Waste 8% • Glass Waste 2%	• 7-day Operations • 1 Cover per 6m²

3.2.6 The waste compositions in Table 3-1 above align with the requirement outlined in London Environment Strategy Policy 7.2.2, which targets a 75% business waste recycling rate by the year 2030.**Table 3-2** summarises the commercial areas that form the Proposed Development.

Table 3-2 Area Schedule

Commercial Use	Waste Metric Applied	Area (m²)	NIA / GIA
Office (Use Class E(g))	Office	31,575	NIA
Life Science (Use Class E(g))		16,487	
Learning (Use Class F1)		1,960	
Commercial, Business and Service Use (Use Class E (Flexible Retail))	F&B	748	GIA

3.2.7 Applying the commercial waste metrics detailed **Table 3-1** to the area schedule summarised in **Table 3-2**, **Table 3-3** provides the estimated weekly waste arisings for the Proposed Development once operational.

Table 3-3 Estimated Weekly Waste Generation

Commercial Use	Litres per Week				
	Residual Waste	DMR	Food Waste	Glass Waste	Total
Office / Life Science / Learning	62,528	175,077	10,004	2,501	**250,110**
Class E Flexible Retail	2,338	6,078	748	187	**9,351**
Total	**64,866**	**181,155**	**10,752**	**2,688**	**259,461**

3.2.8 It is not anticipated that the Proposed Development will generate the volume of waste summarised in **Table 3-3**, as it will be less densely occupied within the lab areas, and the waste metrics do not account for the recent prevalence of hybrid working and paperless offices.

3.3 EXISTING WASTE MANAGEMENT STRATEGY

3.3.1 As the Proposed Development forms part of the Regent's Place Estate, the waste generated will be managed as part of the existing operations on site.

3.3.2 This section will detail the existing Regent's Place Estate waste management strategy employed on-site, summarising all waste streams, storage provisions and collections.

INTERNAL WASTE COLLECTION

3.3.3 Within each tenanted area, commercial tenants temporarily store their waste in segregated containers within communal areas.

3.3.4 An on-site Facilities Management (FM) contractor is currently appointed to collect the segregated waste from these areas as part of standard cleansing operations.

3.3.5 Using the lifts and access corridors, the on-site FM team transfers the segregated bagged waste to nominated tenant waste storage areas within the basement-01 service yard.

COMMERCIAL WASTE STORAGE AND COLLECTIONS

3.3.6 The basement-01 service yard is the location where all segregated waste streams produced in the wider estate are consolidated before collections.

3.3.7 Separate storage provisions are currently provided for a number of waste streams, including:

- Residual waste;
- DMR;

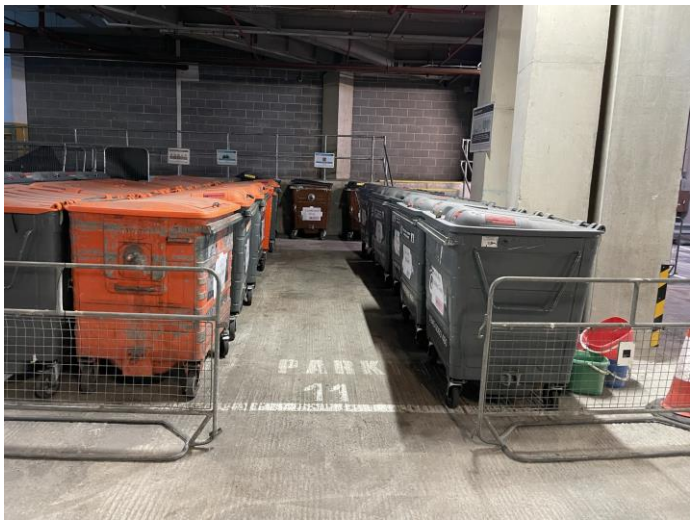
- Glass waste; and
- Food waste.

WASTE STORAGE AREA

3.3.8 Each tenant is allocated a waste storage area, located in the basement-01 service yard, where each waste stream can be deposited prior to consolidation or collection.

3.3.9 An example of a typical tenant waste storage area within the existing estate is shown in **Figure 3-1** below.

Figure 3-1 Typical Service Yard Waste Storage Area



3.3.10 Both residual waste and DMR are stored in 1,100-litre Eurobins, an example of which his shown in **Figure 3-2** below.

Figure 3-2 Example 1,100-Litre Eurobin

3.3.11 Food waste and glass waste are stored separately in a 240-litre wheeled bins, an example of which is shown in **Figure 3-3** below.

Figure 3-3 Example 240-Litre Wheeled Bin

RESIDUAL WASTE AND DMR COMPACTION

3.3.12 As necessary, the on-site FM team transfer the Eurobins containing residual waste and DMR for consolidation within two portable waste compactors, located within the basement-01 service yard.

3.3.13 The portable waste compactors are shown in **Figure 3-4** below.

Figure 3-4 Portable Waste Compactors

3.3.14 Once emptied into the compactors, the on-site FM team return the containers to the respective waste storage areas.

WASTE COLLECTIONS

3.3.15 A commercial waste contractor is currently appointed to collect each waste separately on an agreed schedule.

3.3.16 **Table 3-4** below summarises the waste management storage provisions for existing operations, including collection frequency per waste stream, provided by the current appointed waste contractor.

Table 3-4 Regent's Place Estate Waste Management Services - Existing Operations

Waste Stream	Storage Method	Collection Frequency
Residual Waste	1no. 18m³ Portable Hook-Lift Waste Compactor	Twice Weekly
DMR	1no. 18m³ Portable Hook-Lift Waste Compactor	Weekly
Glass Waste	240-litre Wheeled Bins	Twice Weekly
Food Waste	240-litre Wheeled Bins	Three Times Weekly

3.3.17 On collection days, the commercial waste collection contractor accesses the basement-01 service yard to attend the individual waste streams.

3.3.18 The food waste and glass waste bins are collected directly from each tenant waste area.

3.4 PROPOSED WASTE MANAGEMENT STRATEGY

3.4.1 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.

3.4.2 The existing waste management operations are currently segregating materials effectively, consolidating all waste streams from the wider Regent's Place Estate.

3.4.3 The waste strategy for the Proposed Development will continue to employ the same principles of consolidation and fit within the existing site-wide waste strategy for the Regent's Place Estate.

3.4.4 All facilities for the storage and presentation of commercial waste within the Proposed Development will be designed to British Standard BS5906:2005 *Waste Management in Buildings – Code of Practice standards*. In summary, the commercial waste store will include the following:

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

3.4.5 In line with the existing operation of the Regent's Place Estate, the commercial tenants will provide temporary internal waste storage within their communal areas for segregation of waste at source.

3.4.6 An on-site FM contractor will be appointed to collect the internally segregated waste from as part of standard cleansing operations.

3.4.7 The on-site FM team will collect the waste in suitable trolleys as separate waste streams. An example cleaning trolley is shown in below.

Figur-3-5 Example Cleaning Trolley[3]

3.4.8 Using the service lifts and access corridors, the on-site FM team will transfer the segregated waste to a basement-01 commercial waste store within the Proposed Development.

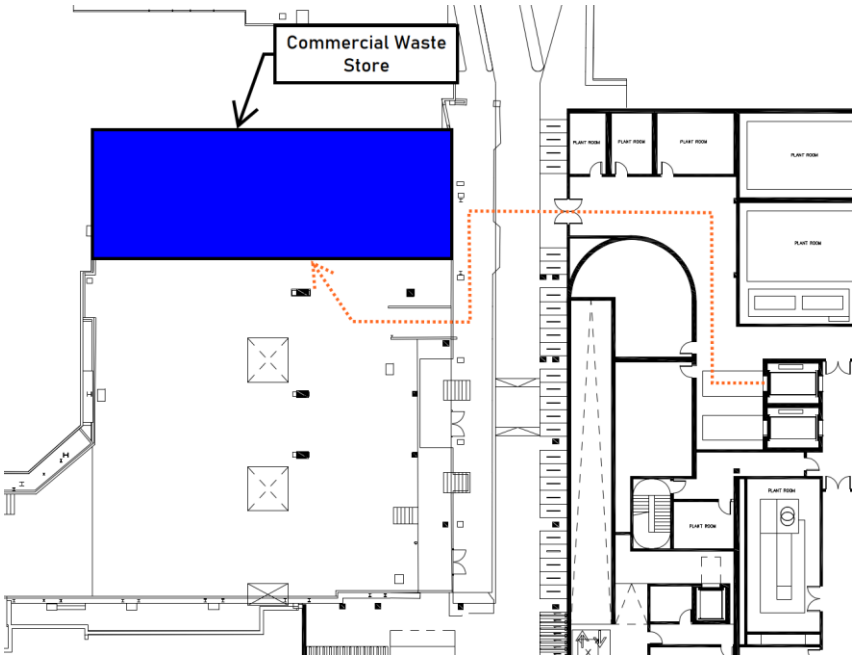
[3] https://storagenstuff.co.uk/product/rubbermaid-triple-capacity-cleaning-cart

COMMERCIAL WASTE STORE

3.4.9 A commercial waste store will be provided in the basement-01 service yard, where all bagged waste streams will be deposited by the on-site FM team.

3.4.10 The location of the tenant commercial waste store, as well as the route from the service lifts is shown in **Figure 3-6** below.

Figure 3-6 Tenant Commercial Waste Store – Basement-01



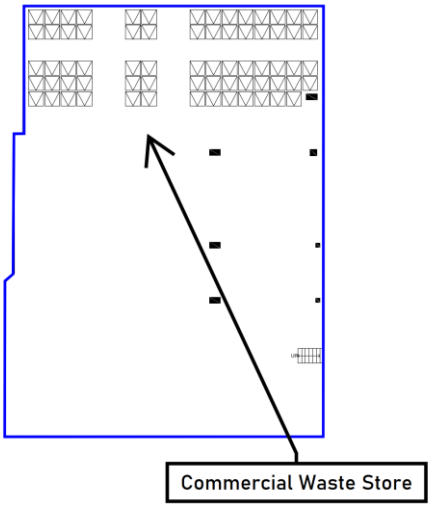
3.4.11 Based on the estimated weekly waste generation detailed in **Table 3-3**, **Table 3-5** below summarises the proposed waste storage provision within in the commercial waste store, assuming daily collections for food waste and glass waste and daily consolidation into the compactors for residual waste and DMR.

Table 3-5 Waste Storage Provisions

Waste Stream	Container Type	No. of Containers	No. of Days' Storage
Residual Waste	1,100-Litre Eurobins	12	1
DMR		33	
Food Waste	240-Litre Wheeled Bins	9	
Glass Waste		3	

3.4.12 **Figure 3-7** below shows the configuration of the tenant commercial waste store, accommodating the containers detailed in **Table 3-5**.

Figure 3-7 Tenant Commercial Waste Store Configuration



3.5 WASTE CONSOLIDATION AND COLLECTION

RESIDUAL WASTE AND DMR

3.5.1 In line with the existing strategy, all residual waste and DMR will be temporarily stored in the tenant commercial waste store before being consolidated into the portable compactors as necessary by the on-site FM team.

3.5.2 The portable waste compactors will continue to be collected as per the existing arrangements by the commercial waste contractor from the basement level 01 service yard.

FOOD WASTE AND GLASS WASTE

3.5.3 In line with the existing strategy, food waste and glass waste bins will be collected directly from the tenant commercial waste store.

3.5.4 Each waste stream will continue to be collected separately by the commercial waste contractor on an agreed schedule.

3.5.5 The commercial waste collection contractor has confirmed that additional collections could be accommodated as necessary to reflect the increased waste generated by the Proposed Development.

3.5.6 As per BS5906:2005 the path between the waste storage areas and the Refuse Collection Vehicle (RCV) will be:

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

4 MANAGEMENT OF LABORATORY WASTE

4.1 INTRODUCTION

4.1.1 This section outlines the waste management strategy that will be used to manage the specialist waste arising from laboratory areas of the Proposed Development.

4.2 INTERNAL TEMPORARY WASTE STORAGE

4.2.1 Space within laboratory areas on each tenant floor will be provided for the temporary storage of specialist waste materials that meet all requirements in accordance with prevailing guidance and legislation.

4.2.2 Due to the range of potential tenants for the laboratory areas, the exact requirements for the temporary waste storage areas will be determined during the fit-out phase as they will be informed by the specific activities of the tenants.

4.3 SPECIALIST AND HAZARDOUS WASTE

4.3.1 It is anticipated that a level of specialist waste will be generated by the Proposed Development once operational, which is anticipated to potentially include flammable, chemical and biohazard waste.

4.3.2 A specialist waste storage area will be provided at basement level 01.

4.3.3 This facility will be designed in accordance with requirements determined by their physical and chemical properties and all prevailing legislation.

4.3.4 The exact design of the storage facilities will also be dictated by the specific requirements of the commercial tenants and their business activities.

4.3.5 As necessary the on-site FM team will transfer the specialist waste from each tenant floor to the specialist waste store at basement level 01.

4.3.6 It is anticipated that tenants may also store small volumes of specialist waste types with specific properties within their tenanted areas.

4.3.7 On an agreed schedule appropriately licensed specialist waste contractors will be appointed to collect directly from the specialist waste store and tenanted areas.

4.4 CLINICAL WASTE

4.4.1 It is expected that a level of clinical waste will be generated by the lab areas within the Proposed Development which will be stored in 770-litre clinical waste bins.

4.4.2 An example clinical waste bin is shown in **Figure 4-1** below.

Figure 4-1 Example 770-Litre Clinical Waste Bin

4.4.3 It is anticipated that the clinical waste bins will be stored within a nominated area within the commercial waste store at basement level 01.

4.4.4 As necessary, the on-site FM team will transfer clinical waste bins collect hazardous waste from tenanted areas and transfer it to the commercial waste store.

4.4.5 The number of clinical waste bins required to service the Proposed Development will vary based on the precise business activities of the tenants.

4.4.6 Based on experience from similar operational developments, it is anticipated that approximately 4-6no. 770-litre Eurobins may be required to service the Proposed Development.

4.4.7 A suitably licenced clinical waste contractor will be appointed to collect the clinical waste bins directly from the commercial waste store on an agreed schedule.

5 SUMMARY AND CONCLUSION

5.1 SUMMARY

5.1.1 Estimated daily waste generation has been calculated using waste metrics provided in British Standard BS5906:2005.

COMMERCIAL WASTE

EXISTING WASTE MANAGEMENT STRATEGY

5.1.2 The site is currently providing separate storage provisions for the following waste streams:

- Residual waste;
- DMR;
- Food waste; and
- Glass waste.

5.1.3 All waste streams are transferred around the estate to the basement-01 service yard by the on-site FM team for consolidation into respective tenanted waste storage areas.

5.1.4 Residual waste and DMR is temporarily stored within the waste storage areas before being consolidated into two portable waste compactors, located in the service yard, by the on-site FM team.

5.1.5 Each waste stream is collected multiple times a week in accordance with the LBC approved servicing hours.

PROPOSED WASTE MANAGEMENT STRATEGY

5.1.6 The existing waste management operations are currently segregating material effectively, and the proposed waste strategy will therefore maintain the same principles of consolidation and collection for each waste stream.

5.1.7 Commercial occupiers will temporarily store segregated waste within their tenanted areas.

5.1.8 All waste generated during the operational phase of Proposed Development will be collected internally and transferred to the tenant commercial waste store by the on-site FM team.

5.1.9 A tenant commercial waste store will be provided in basement level 01 with separate residual waste, DMR, glass waste and food waste storage, constructed to BS5906:2005 standards.

5.1.10 On a regular basis, the on-site FM team will transfer all waste streams to the tenant commercial waste store.

5.1.11 Residual waste and DMR will be consolidated at basement level 01 as a continuation of the existing waste strategy.

5.1.12 Each waste stream will continue to be collected multiple times a week in accordance with the LBC approved servicing hours for the Proposed Development.

5.1.13 Additional waste collections could be implemented as necessary to accommodate the waste generated by the Proposed Development.

LABORATORY WASTE

CLINICAL WASTE

5.1.14 Clinical waste will be stored in 770-litre Eurobins in the loading bay.

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

SPECIALIST WASTE

5.1.16 Specialist waste will be stored in a separate waste store, designed in accordance with prevailing legislation for the physical and chemical properties for each material type.

5.1.17 It is anticipated that tenants may also store small volumes of specialist waste types with specific properties within their tenanted areas rather than the communal waste stores at basement-01.

5.1.18 The design of the storage facilities will also be dictated by the specific requirements of the commercial tenants and their business activities.

5.2 CONCLUSION

5.2.1 This waste management strategy 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.

5.2.2 The proposals set out in this OWMS meet the requirements of relevant waste policy and follow applicable guidance.

APPENDIX A

NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

NATIONAL WASTE POLICY

DLUHC, NATIONAL PLANNING POLICY FRAMEWORK (2023)[4]

The revised National Planning Policy Framework was updated in September 2023 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 be applicable to the Proposed Development.

DCLG, NATIONAL PLANNING POLICY FOR WASTE (2014)[5]

The National Planning Policy for Waste 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.

DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS (DEFRA), OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND (2018)[6]

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)[7]

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**.

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf

[5] https://www.gov.uk/government/publications/national-planning-policy-for-waste

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

[7] 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)[8]

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.

[8] 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)[9]

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)[10]

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.*

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[9] GLA (2021) *The London Plan*
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

[10] 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

LBC, LOCAL PLAN (2017)[11]

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.'

[11] LBC (2017) *Local Plan*

https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6

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)[12]

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.LBC, CAMDEN PLANNING GUIDANCE: DESIGN (JANUARY 2021)[13]

This document supports the development design policies in the Camden Local Plan, 2017. The document covers a range of topics including housing, waste, sustainability, amenity and planning obligations. It is supplementary to the technical guidance, which details the design of waste storage facilities in new developments.

LBC, CAMDEN PLANNING GUIDANCE: TRANSPORT (JANUARY 2021)[14]

This document supports the transport policies in the Camden Local Plan, 2017. The document supplements the technical guidance, which details the servicing requirements for waste storage facilities in new developments.

LBC, EUSTON AREA PLAN (JANUARY 2015)[15]

The Euston Area Plan (EAP) is underway to establish a comprehensive planning framework aimed at steering changes in the area. The primary focus is on the revitalization of Euston Station, with the overarching goal of extending the scope of regeneration to positively impact both the local community and the broader London area.

[12] LBC (2014) *Waste Storage and Arrangements for Residential and Commercial Units (Supporting Document for Planning Guidance Cgp1 Design Storage and Collection for Recycling and Waste)*

https://www.camden.gov.uk/documents/20142/0/ES+Technical+Waste+Planning+Guidance+2018final+-+FV+%5BPDF%5D.pdf/4f682792-29fa-89ca-00b1-f2a7fb5a6dc1

[13] LBC (2021) *Camden Planning Guidance: Design*

https://www.camden.gov.uk/documents/20142/4823269/Design+CPG+Jan+2021.pdf/086b8201-aa57-c45f-178e-b3e18a576d5e?t=1611580522411

[14] LBC (2021) *Camden Planning Guidance: Transport*

https://www.camden.gov.uk/documents/20142/4823269/Transport+CPG+Jan+2021.pdf/ac4da461-7642-d092-d989-6c876be75414?t=1611758999226

[15] LBC (2015) *Euston Area Plan*

https://www.eustonareaplan.info/wp-content/uploads/2012/09/EAP-Adopted-January-2015-complete.pdf

VELOCITY