

The South Molton Triangle

June 2020

Waste Management Strategy



GROSVENOR

WSP





Grosvenor Properties

THE SOUTH MOLTON TRIANGLE

Waste Management Strategy

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NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

1 INTRODUCTION

1.1 APPOINTMENT

- 1.1.1. WSP have been appointed by Grosvenor Properties to provide a Waste Management Strategy for South Molton Triangle which is located within The City of Westminster (WCC) (hereafter referred to as the 'Proposed Development').

1.2 SITE DESCRIPTION

- 1.2.1. The existing site is contained within a triangular urban block bounded by Brook Street, Davies Street and South Molton Street, including 42 South Molton Street, but excludes 58 Davies Street.
- 1.2.2. The site comprises 26 buildings in a mix of commercial land uses, which are Class A1 retail, Class A4 public house and Class B1 offices, with Class C3 residential, Class D1 uses and Sui Generis uses.
- 1.2.3. There is a mix of building styles and 19 buildings are statutorily listed.
- 1.2.4. The location of the site is shown in **Figure 1-1**.

Figure 1-1 – Site Location



1.3 DEVELOPMENT DESCRIPTION

- 1.3.1. Part demolition, new buildings and alterations to existing buildings comprising; redevelopment of 60 Brook Street, redevelopment behind retained façade at 48, 50, 56 and 58 Brook Street; redevelopment behind retained and partially reconstructed façade at 52-54 Brook Street; refurbishment with alterations and addition of turret and gables at 40-46 Brook Street and 40 South Molton Lane; redevelopment behind retained street elevations and front roof at 1-8 Davies Mews and 28-30 South Molton Lane; refurbishment and alterations at 50 Davies Street; refurbishment with alterations and partial demolition and redevelopment of upper floors at 52-54 Davies Street; redevelopment behind reconstructed and extended facade at 56 Davies Street and Brookfield House (44-48 Davies Street and 62 and 64 Brook Street); part demolition of ground floor and refurbishment at 10 South Molton Street; refurbishment and alterations at 15 – 25, 27 and 42 South Molton Street; to provide a development of up to 9 storeys including Class B1, Class A1 and A3, Class A4, and Class A4 with sui generis, Class C3, Class D1 and Class C1 uses, improvements to public realm and pedestrian routes, servicing, ancillary plant and storage, cycle parking and other associated works.

1.4 PROPOSED DEVELOPMENT

- 1.4.1. The application consists of a mixed-use development in the heart of Mayfair, and the Central Activities Zone. The scheme proposes 33,273 sqm GIA floorspace, of which:

- i. 18,947 sqm GIA is to be provided as offices (Class B1)
- ii. 3,168 sqm as hotel (Class C1),
- iii. 1,208 sqm GIA as education or training centre (Class D1),
- iv. 2,923 sqm of Residential (Class C3),
- v. 6,272 sqm GIA as Retail (Class A1 and A3);
- vi. 506 sqm GIA as Pub (Class A4); and
- vii. 150 sqm sui generis rooms above Pub.

- 1.4.2. The proposal has been subdivided into four key areas of development:

North Block

- 1.4.3. The North Block proposes:

- viii. redevelopment behind retained street elevations and front roof at 1-8 Davies Mews and 28-30 South Molton Lane;
- ix. refurbishment and alterations at 50 Davies Street;
- x. refurbishment with alterations and partial demolition and redevelopment of upper floors at 52-54 Davies Street
- xi. redevelopment behind reconstructed and extended facade at 56 Davies Street; and
- xii. comprising a new building of ground plus 8 storeys, comprising a mix of use Class A1 and A3 (Retail), Class B1 (Offices), Class D1 (education or training) and Class A4 (Public house with sui generis rooms above) uses.

South Block

1.4.4. The South Block proposes:

- i. redevelopment behind retained façade at 48, 50, 56 and 58 Brook Street;
- ii. redevelopment of 60 Brook Street;
- iii. redevelopment behind retained and partially reconstructed façade at 52-54 Brook Street;
- iv. redevelopment behind reconstructed and extended facade at Brookfield House (44-48 Davies Street and 62 and 64 Brook Street); and
- v. comprising a new build of ground plus 7 storeys, comprising a mix of retail (Class A1 and A3) and offices (Class B1).

40-46 Brook Street

1.4.5. The refurbishment with alterations and addition of turret and gables at 40-46 Brook Street and 40 South Molton Lane, listed Grade II, to deliver a 31-bedroom boutique hotel;

South Molton Street Properties

The refurbishment and alteration of the properties to allow for the provision of retail uses at basement and ground floor, with Class C3 residential floorspace above. No. 10, 15-22 and 42 South Molton Street propose retail (Class A1, & A4) on ground and basement levels, and private residential (Class C3) on the upper floors, whilst No. 23-25 & 27 South Molton Street propose retail (Class A1) on ground and basement levels, and affordable residential (Class C3) on the upper floors. In addition, it is proposed to introduce a ground floor passageway at 10 South Molton Street creating an additional link from South Molton Lane through to South Molton Street.

1.5 STRATEGY AIMS

1.5.1. The aim of this strategy is to consider the key issues associated with sustainable management of waste at the Proposed Development during the operation phase, with particular reference to:

- Identifying procedures and processes that should be adopted that will encourage tenants to maximise the recycling and recovery of waste and thereby minimise disposal, in line with Government policy;
- Identifying opportunities for waste segregation and the transfer of waste to appropriate processing facilities; and
- Producing a flexible waste strategy that can adapt to future recycling markets and developing regulatory control.

1.6 METHODOLOGY

1.6.1. The development of this strategy has involved a number of tasks including:

- A desk-top review to collate information relating to waste generation, collection and disposal options;
- Review of WCC waste management requirements and identification of any forthcoming policy changes for developments in the area;
- A review of available and accessible planning and policy guidance information; and

- Identification of opportunities for reuse and recycling during the operational phase of the Proposed Development.

1.7 REPORT STRUCTURE

1.7.1. Due to the complexities of the site, the multiple uses and in some cases shared waste facilities, the report has been set out in the following format:

- **Section 1: Introduction.**
- **Section 2: Waste Legislation, Policy & Guidance** - details of the national legislation and policies that have relevance to the Proposed Development.
- **Section 3: Management of Operational Waste – North Block and South Block** - details the strategy which will be adopted to manage the operational waste arising from the retail, food and beverage (including public house), education or training facility, and office space within the North Block and South Block.
- **Section 4: Management of Operational Waste – 40-46 Brook Street** - details the strategy which will be adopted to manage the operational waste arising from the hotel including the restaurant and bar located within 40-46 Brook Street.
- **Section 5: Management of Operational Waste – South Molton Street Properties** - details the strategy which will be adopted to manage the operational waste arising from the residential and ground floor retail units within the South Molton Street Properties.
- **Section 6: Summary & Conclusions.**
- **Appendix A: National, London and Local Waste Policy & Guidance.**

2 WASTE LEGISLATION, POLICY AND GUIDANCE

2.1 INTRODUCTION

- 2.1.1. The development and implementation of European Union (EU) waste policy and legislation is delivered by EU Directives such as the Landfill Directive, Waste Electrical and Electronic Equipment Directive etc. Member States must implement the policy drivers and requirements of these Directives through national legislation.
- 2.1.2. The revised Waste Framework Directive (rWFD) is a unique EU Directive because it clarifies the definition of 'waste' and of other concepts such as 'recycling' and 'recovery'. It implements a revised Waste Hierarchy, expands the 'polluter pays' principle by emphasising producer responsibility and applies more stringent waste reduction and management targets for Member States. It also requires Member States to take measures to promote high quality recycling and to set up separate collections of paper, plastic, metal and glass.
- 2.1.3. The UK formally left the EU on 31 January 2020. Under the UK-EU withdrawal agreement, a transition period will end on 31 December 2020 (unless extended), during which time the UK will be treated for most purposes as if it were still an EU Member State, and most EU law (including as amended or supplemented) will continue to apply to the UK. At the end of the transition period, it is likely that legislation will remain in force as part of UK law and be repealed or amended at the will of Parliament or the devolved parliaments / assembly. For the purpose of this report we assume that the effect of the rWFD will continue to be applied in the UK.
- 2.1.4. This section summarises the national legislation that is relevant to the Proposed Development, much of which is influenced by the rWFD. National, London and local waste policy and guidance reviewed during the preparation of this Waste Management Strategy are listed below.

2.2 NATIONAL LEGISLATION

- 2.2.1. A list of relevant items of national waste legislation is outlined below in reverse chronological order:
 - **Waste Management, The Duty of Care Code of Practice (2016 update)** – This code of practices 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 duty of care requirements and its rules will be taken into account where relevant in any case based on breach of the duty of care.
 - **The Waste (England and Wales) Regulations 2011 (as amended)** - From 1 January 2015, waste collection authorities must collect waste paper, metal, plastic and glass separately. It also imposes a duty on waste collection authorities, from the date, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
 - **Environmental Protection Act 1990** - Part II of the act was originally implemented by the Duty of Care Regulations 1991. The Duty of Care is a legal requirement for those dealing with certain kinds of waste to take all reasonable steps to keep it safe and is set out in Section 34 of the Act. The Waste (England and Wales) Regulations 2011 repealed the Environmental Protection (Duty of Care) Regulations 1991 and apply the Duty of Care requirements by the Environmental Protection Act 1990.

2.3 NATIONAL, LONDON & LOCAL WASTE POLICY

2.3.1. The relevant national, London and local waste policies that were reviewed during the preparation of this Waste Management Strategy are outlined below and further detail provided in **Appendix A**:

- Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework* (2019);
- MHCLG, *National Planning Policy for Waste* (2014);
- Department for Environment, Food and Rural Affairs (Defra), *Our Waste, Our Resources: A Strategy for England* (2018);
- Greater London Authority (GLA) *London Environment Strategy* (2018);
- GLA, *The London Plan: Spatial Development Strategy for Greater London - Consolidated with Alterations since 2011* (2016);
- GLA, *Intend to Publish London Plan 2019* (December 2019);
- London Waste and Recycling Board (LWARB), *Waste Management Planning Advice for New Flatted Properties – Project Report* (2014);
- Westminster City Council (WCC), *Municipal Waste Management Strategy 2016-2031* (2014);
- WCC, *Westminster's City Plan* (2016); and
- WCC, *Waste and Recycling Storage Requirements* (2019).

3 MANAGEMENT OF OPERATIONAL WASTE – THE NORTH BLOCK AND SOUTH BLOCK

3.1 INTRODUCTION

- 3.1.1. This section outlines the plan which will be adopted to successfully manage the retail and office wastes arising from the North Block and South Block development once operational.
- 3.1.2. This section also includes the retail wastes arising from 50-54 Davies Street as these units will use the same waste storage facilities provided to service the North Block and South Block.
- 3.1.3. It is proposed that the North Block and South Block, and 50-54 Davies Street will provide a mixture of commercial space including retail (A1) and restaurant (A3), public house (A4) with rooms above (sui generis), office space (B1) and an education and training centre (D1).

3.2 WASTE GENERATION MODEL

- 3.2.1. The calculation of waste generation levels has been estimated using waste metrics sourced from WCC's planning guidance entitled Recycling and Waste Storage Requirements (2019) (hereafter referred to as '*the Guidance*').
- 3.2.2. The waste generation metrics used in this waste management strategy are detailed in **Table 3-1** below.

Table 3-1 – WCC Waste Generation Metrics

Waste Source	Waste Generation Metric (Weekly)
Retail (A1)	4,000 Litres waste storage per 1,000m ² gross floor space
Retail (A3)	3,500 Litres waste storage per 1,000m ² gross floor space
Retail (A4)*	3,500 Litres waste storage per 1,000m ² gross floor space
Office (B1)	2,000 Litres waste storage per 1,000m ² gross floor space
Educational or Training Centre (D1)	2,000 Litres waste storage per 1,000m ² gross floor space
* Includes rooms above the public house (Sui Generis)	

- 3.2.3. The proposed area schedule is detailed in **Table 3-2**.

Table 3-2 – Proposed Area Schedule

Use Class	North Block and South Block	50-54 Davies Street	TOTAL
	Area (m ²)	Area (m ²)	Area (m ²)
Retail (A1)	2,879	274	3,153
Retail (A3)	1,510	0	1,510
Public House (A4)*	0	451	451
Office (B1)	18,947	0	18,947
Educational or Training Centre (D1)	1,208	0	1,208
TOTAL	24,544	725	25,269
* Includes rooms above the public house (Sui Generis)			

3.2.4. **Table 3-3** outlines the estimated waste arisings based on a weekly collection.

Table 3-3 – Estimated Waste Arising (Weekly)

Use Class	Waste Arising (Litres / Week)
Retail (A1)	12,612
Retail (A3)	5,285
Public House (A4)*	1,579
Office (B1)	37,894
Educational or Training Centre (D1)	2,416
TOTAL (LITRES)	59,786
* Includes rooms above the public house (Sui Generis)	

3.2.5. It is proposed that the waste from the Proposed Development will be collected on a daily basis. **Table 3-4** outlines the estimated daily waste arising.

Table 3-4 – Estimated Waste Arising (Daily)

Use Class	Waste Arising (Litres / Week)	Waste Arising (Litres / Day)*
Retail (A1)	12,612	3,603
Retail (A3)	5,285	1,510
Public House (A4)**	1,579	451
Office (B1)	37,894	10,827
Educational or Training Centre (D1)	2,416	690
TOTAL (Litres)		17,081
<p>* Assumes the provision of two days waste storage capacity.</p> <p>** Includes rooms above the public house (Sui Generis).</p>		

3.2.6. As stated in the Guidance, **Table 3-5** summarises the waste composition for each use class.

Table 3-5 – Waste Proportions

Waste Type	Use Class A1	Use Class A3/A4/Sui Generis	Use Class B1	Use Class D1
Refuse	30%	30%	30%	30%
Paper and Cardboard	50%	10%	50%	50%
Other Dry Recycling	10%	10%	10%	10%
Glass	n/a	10%	n/a	n/a
Food Waste	10%	40%	10%	10%
TOTAL	100%	100%	100%	100%

3.2.7. **Table 3-6** outlines the estimated total daily waste arising per segregated waste stream.

Table 3-6 – Estimate Total Daily Waste Arising per Waste Stream

Use Class	Refuse (Litres / Day)	Paper & Cardboard (Litres / Day)	Other Dry Recyclables (Litres / Day)	Glass (Litres / Day)	Food (Litres / Day)
Retail (A1)	1,081	1,802	360	0	1,083
Retail (A3)	453	151	151	151	604
Public House (A4)*	135	45	45	45	180
Office (B1)	3,248	5,413	1,083	0	1,083
Educational or Training Centre (D1)	207	345	69	0	69
TOTAL (Litres)	5,124	7,756	1,708	196	2,296
* Includes rooms above the public house (Sui Generis)					

3.3 PROPOSED WASTE MANAGEMENT STRATEGY

- 3.3.1. The proposed waste management strategy has been prepared to provide a high-quality service to the tenants whilst also complying with the Guidance.
- 3.3.2. The strategy has been split into the following sections:
- Individual Tenancies; and
 - Proposed Waste Strategy.

3.4 INDIVIDUAL TENANCIES

- 3.4.1. Each occupier of the retail units and offices will be required to provide as part of their fit-out sufficient internal waste storage within their tenanted space to segregate their waste into the following waste streams:
- Refuse;
 - Cardboard and paper;
 - Other dry recyclables;
 - Glass (A3, A4 and Sui Generis only); and
 - Food waste
- 3.4.2. The storage capacity of each tenant's internal waste storage area will be dependent on the following factors:
- The number of employees;
 - The business activities occurring; and

- The frequency that the refuse and recyclables will be transported from their unit to the main waste storage area.

3.5 PROPOSED WASTE STRATEGY

- 3.5.1. Based on the estimated daily waste volumes detailed in **Table 3-6**, **Table 3-7** summarises the number and types of waste containers provided within the main waste storage area to service both the North Block and South Block.

Table 3-7 – Main Waste Storage Area – Waste Container Requirements (North Block and South Block)

Waste Stream	Estimated Daily Waste (Litres)	Container Type	Required (No.)
Refuse	5,124	1,100 Litre Eurobin	5
Paper & Cardboard	7,756	Baler*	1
Other Dry Recyclables	1,708	1,100 Litre Eurobin	2
Glass	196	240 Litre Wheeled Bin	1
Food	2,296	140 Litre Wheeled Bin	17
* WCC (Saeed Oluwadipe) requested a baler during the preapplication meeting on 9 th April 2020 and Grosvenor was content to agree its inclusion.			

- 3.5.2. Due to the potential health and safety implications associated with tenants using the baler, it is proposed that three additional 1,100 litre Eurobins with a drop back¹ will be provided in the main waste storage area for the tenants to dispose of their cardboard and paper. At regular intervals the on-site FM team will remove the paper and cardboard from the bins and will compact it using the baler.
- 3.5.3. The dimensions of the proposed bins have been detailed in **Table 3-8**.

¹ Source – Egbert Taylor Limited - <https://egberttaylor.com/assets/uploads/2019/11/dropback.pdf>

Table 3-8 – Waste Bin Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
1,100 Litre Eurobin*	1,260	980	1,370
140 Litre Wheeled Bin	485	550	1,065
240 Litre Wheeled Bin	585	740	1,100
* Includes the proposed drop back bin for paper and cardboard.			

3.5.4. An example of a suitable baler is shown in **Figure 3-1**.

Figure 3-1 – Example Baler²



3.5.5. The dimensions of the baler are provided in **Table 3-9**.

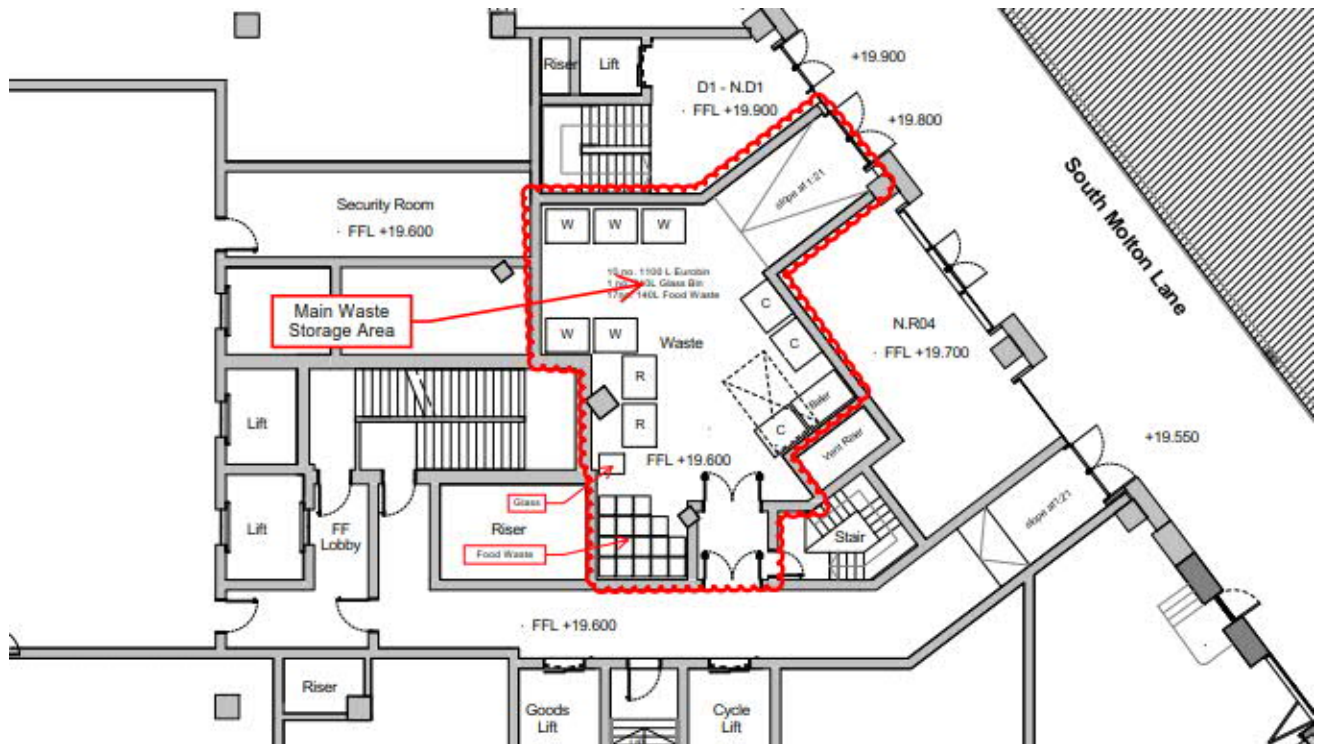
Table 3-9 – Baler Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
Baler	1,560	1,030	2,630

3.5.6. The location and layout of the main waste storage area is shown in **Figure 3-2**.

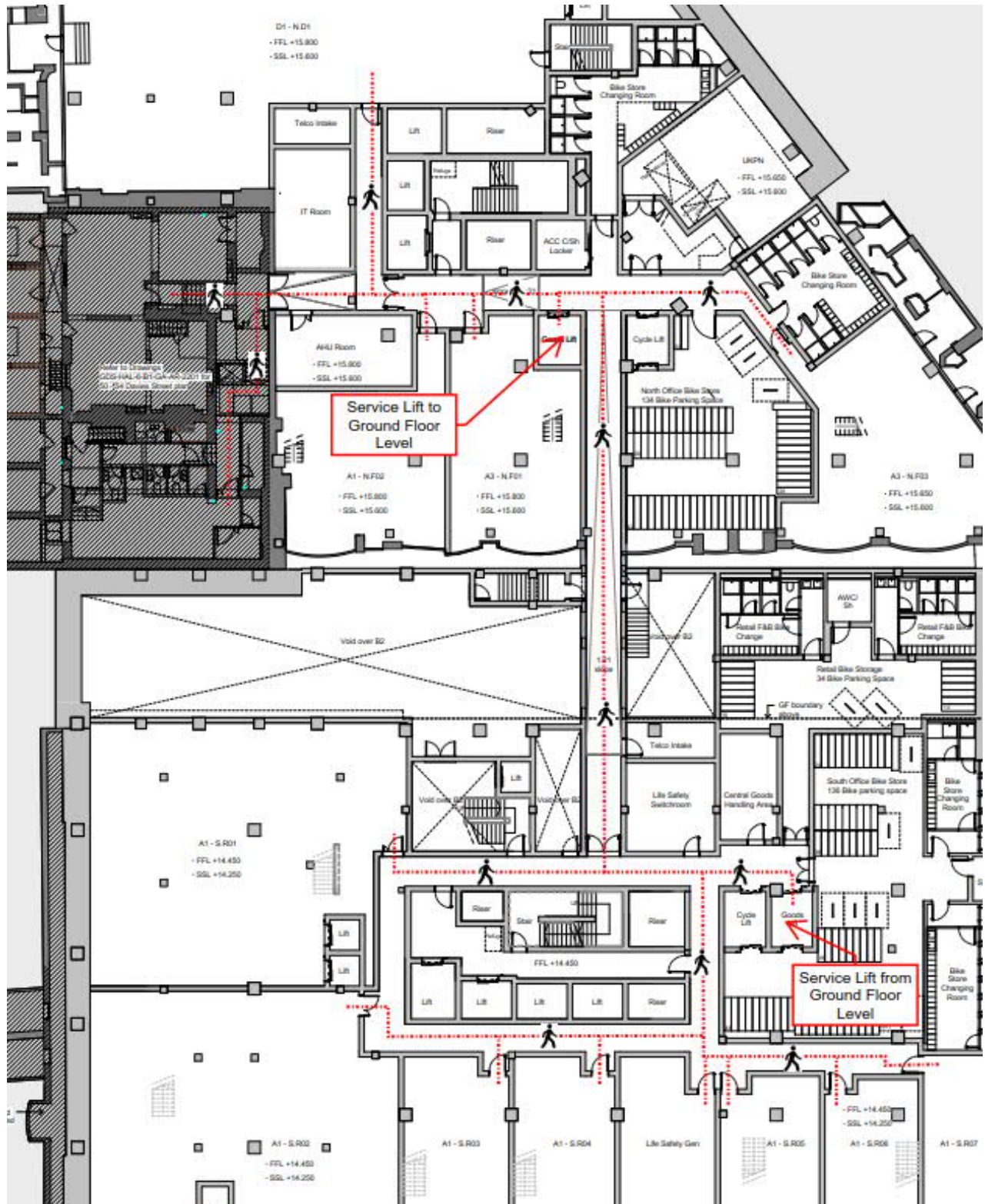
² Source – Pakawaste Limited - <https://www.pakawaste.co.uk/wp-content/uploads/VB100.pdf>

Figure 3-2 – Main Waste Storage Area Location and Layout



- 3.5.7. As shown, the main waste storage area will be arranged with the bins in a block parked layout. In order to ensure that there are always sufficient bins accessible to allow the tenants to dispose of their waste, the on-site FM team will regularly monitor the main waste storage area and will rotate the bins as required.
- 3.5.8. The individual retail and office tenants will be responsible for transporting their own waste from their internal waste storage areas to the main waste storage area at ground floor level within the North Block.
- 3.5.9. To prevent waste being transported from individual tenanted units through the public realm areas, it is proposed that waste movements will be carried out using back of house access corridors at basement and ground floor level.
- 3.5.10. **Figure 3-3** shows the proposed access routes that shall be used by the retail units and offices at ground floor level.
- 3.5.11. Retail units at ground floor level in the South Block with no basement access will be required to transport their waste to the main waste storage area using the service lifts and basement level back of house corridors.

Figure 3-4 – Basement Level Back of House Access Routes

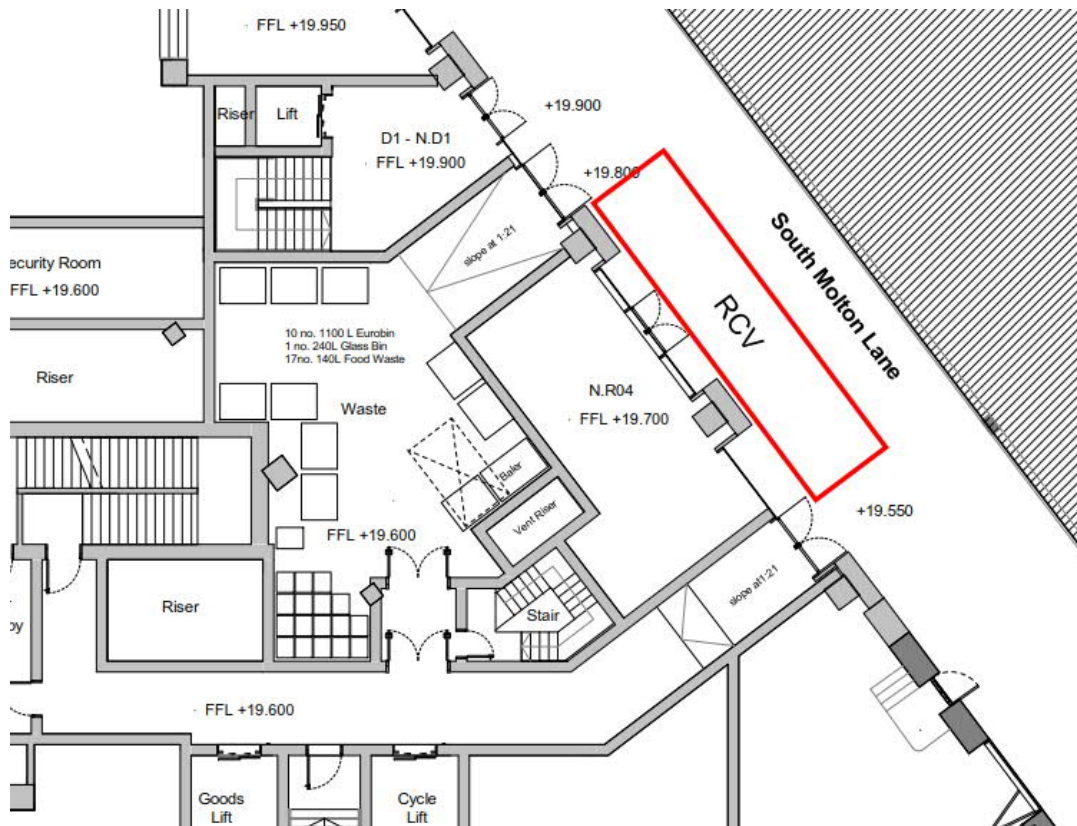


3.5.13. It should be noted that retail units N.R01 and N.R04 do not have direct back of house corridors access to the main waste storage area and will therefore have to transfer their waste a short distance along South Molton Lane to access the main waste storage area. To mitigate negative

impacts on South Molton Lane, pedestrians and other neighbouring businesses, the tenants will be encouraged not to transfer their waste during peak footfall periods.

- 3.5.14. It is proposed that waste collections will take place directly from the main waste storage area within a defined collection window starting at 0700 hours for a period of 4 to 5 hours.
- 3.5.15. The appointed commercial waste contractor will park their refuse collection vehicle (RCV) adjacent to the main waste storage area on South Molton Lane as shown in **Figure 3-5**.

Figure 3-5 – RCV Parking Location



- 3.5.16. **Figure 3-6** show the swept path assessment for the RCV.

Figure 3-6 – RCV Swept Path



4 MANAGEMENT OF OPERATIONAL WASTE – 40 TO 46 BROOK STREET

4.1 INTRODUCTION

- 4.1.1. This section outlines the plan which will be adopted to successfully manage the hotel waste arising from 40 – 46 Brook Street.

It is proposed that 40-46 Brook Street will provide a 31-bedroom boutique hotel with a restaurant and bar.

4.2 WASTE GENERATION MODEL

- 4.2.1. The calculation of waste generation levels has been estimated using waste metrics sourced from the Guidance.
- 4.2.2. The waste generation metrics used in this waste management strategy are detailed in **Table 4-1** below.

Table 4-1 – WCC Waste Generation Metrics

Waste Source	Waste Generation Metric (Weekly)
Hotel, Restaurant/Fast Food Outlets (A3, A4, A5 and C1)	3,500 Litres waste storage per 1,000m ² gross floor space

- 4.2.3. The proposed area schedule is detailed in **Table 4-2**.

Table 4-2 – Proposed Area Schedule

Use Class	Area - GIA (m ²)
C1 – Hotel	3,168
TOTAL	3,168

- 4.2.4. **Table 4-3** outlines the estimated waste arisings based on a weekly collection.

Table 4-3 – Estimated Waste Arising (Weekly)

Use Class	Waste Arising (Litres / Week)
Hotel including Restaurant and Bar	11,088
TOTAL (LITRES)	11,088

- 4.2.5. It is proposed that the waste from the Proposed Development will be collected on a daily basis. **Table 4-4** outlines the estimated daily retail waste arising.

Table 4-4 – Estimated Waste Arising (Daily)

Use Class	Waste Arising (Litres / Day)*
Hotel including Restaurant and Bar	3,168
TOTAL (Litres)	3,168
* Assumes the provision of two days waste storage capacity.	

- 4.2.6. As stated in the Guidance, **Table 4-5** summarises the assumed waste composition.

Table 4-5 – Waste Proportions

Waste Type	Hotel
Refuse	30%
Paper and Cardboard	10%
Other Dry Recycling	10%
Glass	10%
Food Waste	40%
TOTAL	100%

- 4.2.7. **Table 4-6** outlines the estimated total daily waste arising per segregated waste stream.

Table 4-6 – Estimate Total Daily Waste Arising per Waste Stream

Use Class	Refuse (Litres / Day)	Paper & Cardboard (Litres / Day)	Other Dry Recyclables (Litres / Day)	Glass (Litres / Day)	Food (Litres / Day)
Hotel	950	317	317	317	1,267

4.3 PROPOSED WASTE STRATEGY

- 4.3.1. Based on the estimated daily waste volumes detailed in **Table 4-6**, **Table 4-7** summarises the number and types of waste containers provided in the main waste storage area.
- 4.3.2. It should be noted that due to the size of the service lift provided to service the hotel that it is not possible to use large 660 litre or 1,100 litre Eurobins. It is therefore proposed to store all waste in 240 litre or 360 litre wheeled bins.

Table 4-7 – Main Waste Storage Area – Waste Container Requirements

Waste Stream	Estimated Daily Waste (Litres)	Container Type	Required (No.)
Refuse	950	360 Litre Wheeled Bin	3
Paper & Cardboard	317	360 Litre Wheeled Bin	1
Other Dry Recyclables	317	360 Litre Wheeled Bin	1
Glass	317	240 Litre Wheeled Bin	2
Food	1,267	140 Litre Wheeled Bin	9

- 4.3.3. The dimensions of the proposed bins have been detailed in **Table 4-8**.

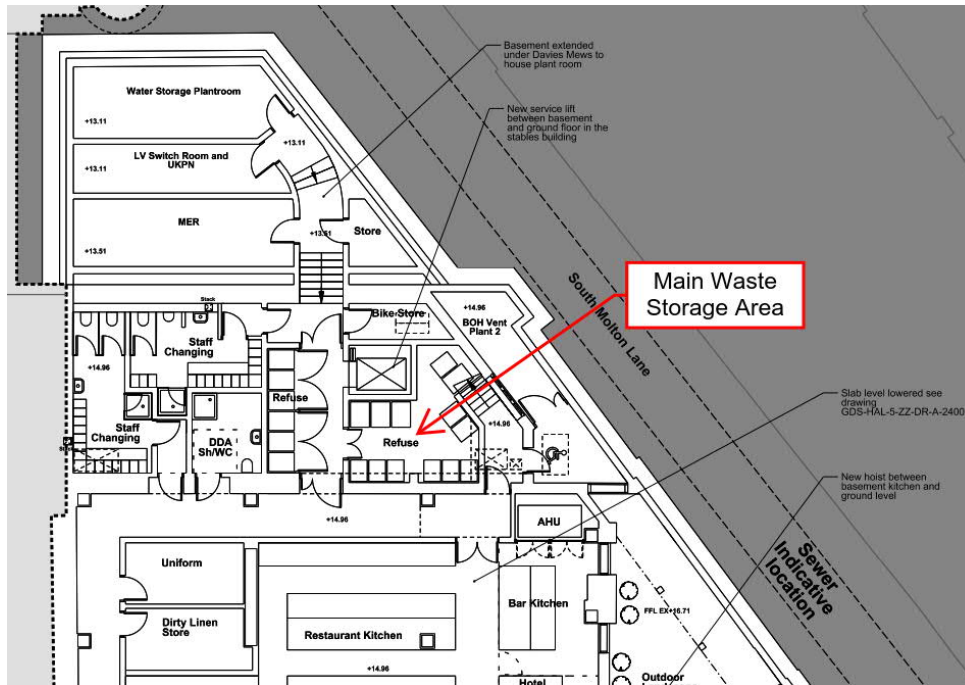
Table 4-8 – Waste Bin Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
360 Litre Wheeled Bin	660	880	1,100
240 Litre Wheeled Bin	585	740	1,100
140 Litre Wheeled Bin	485	550	1,065

- 4.3.4. It should be noted that no compaction or baling of the hotel's wastes has been assumed as the waste volumes are considered to be too small.

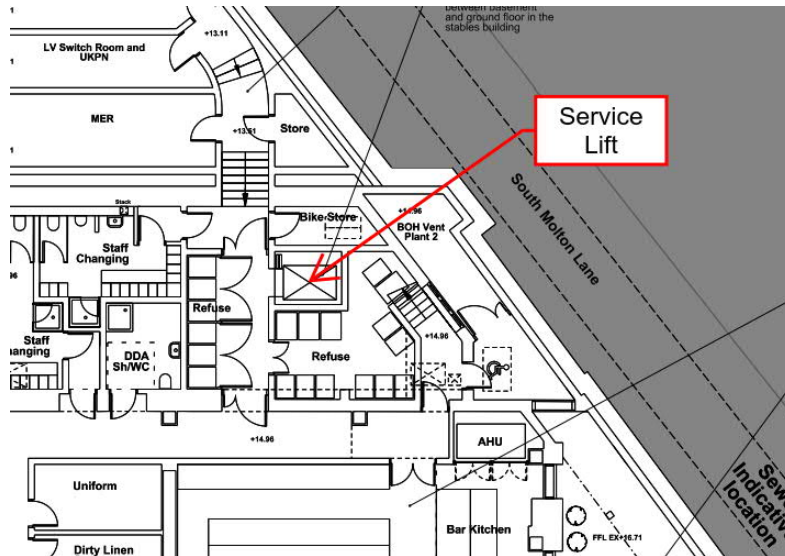
- 4.3.5. The main waste storage area will be provided at lower ground floor level and the location and layout is shown in **Figure 4-1**.

Figure 4-1 – Main Waste Storage Area Location and Layout



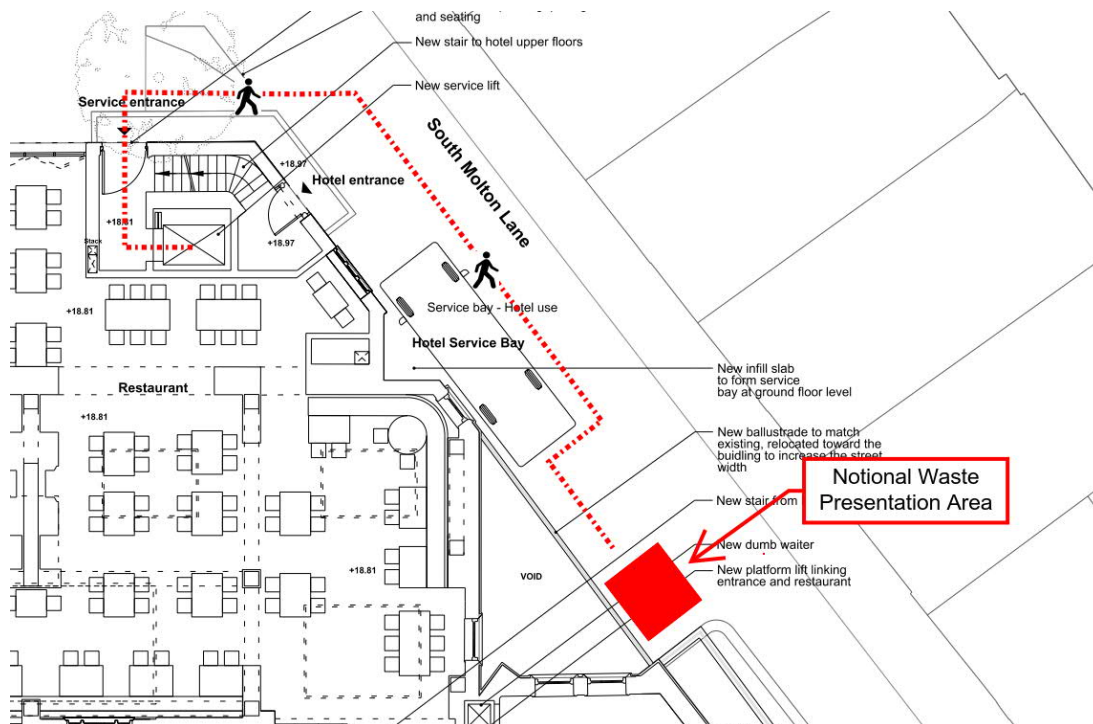
- 4.3.6. The hotel operator will be responsible for managing the wastes generated within the hotel including the restaurant and bar areas and for transporting the waste to the main waste storage area.
- 4.3.7. The hotel operator will be responsible for appointing their own waste collection contractor.
- 4.3.8. On a daily basis and prior to the agree collection time the hotel operator's FM team will transfer the bins from the main waste storage area to the waste presentation area on South Molton Lane via the hotel's service lift.
- 4.3.9. The location of the service lift is shown in **Figure 4-2**.

Figure 4-2 – Hotel Service Lift



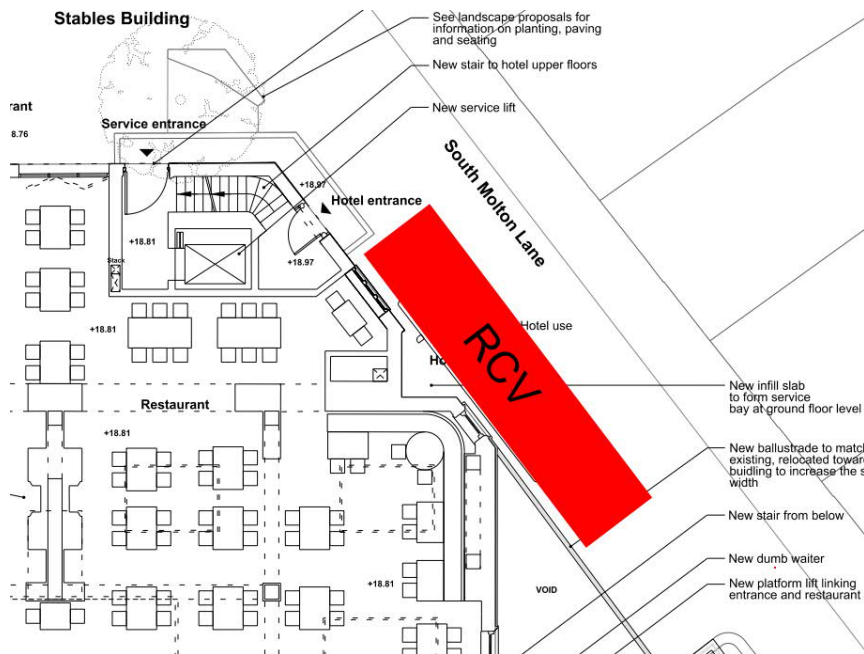
4.3.10. The location of the waste presentation area and the FM access route are shown in **Figure 4-3**.

Figure 4-3 – Waste Presentation Area and Access Route



4.3.11. The hotel operator's appointed commercial waste contractor will park their RCV adjacent to the waste presentation area on South Molton Lane as shown in **Figure 4-4**.

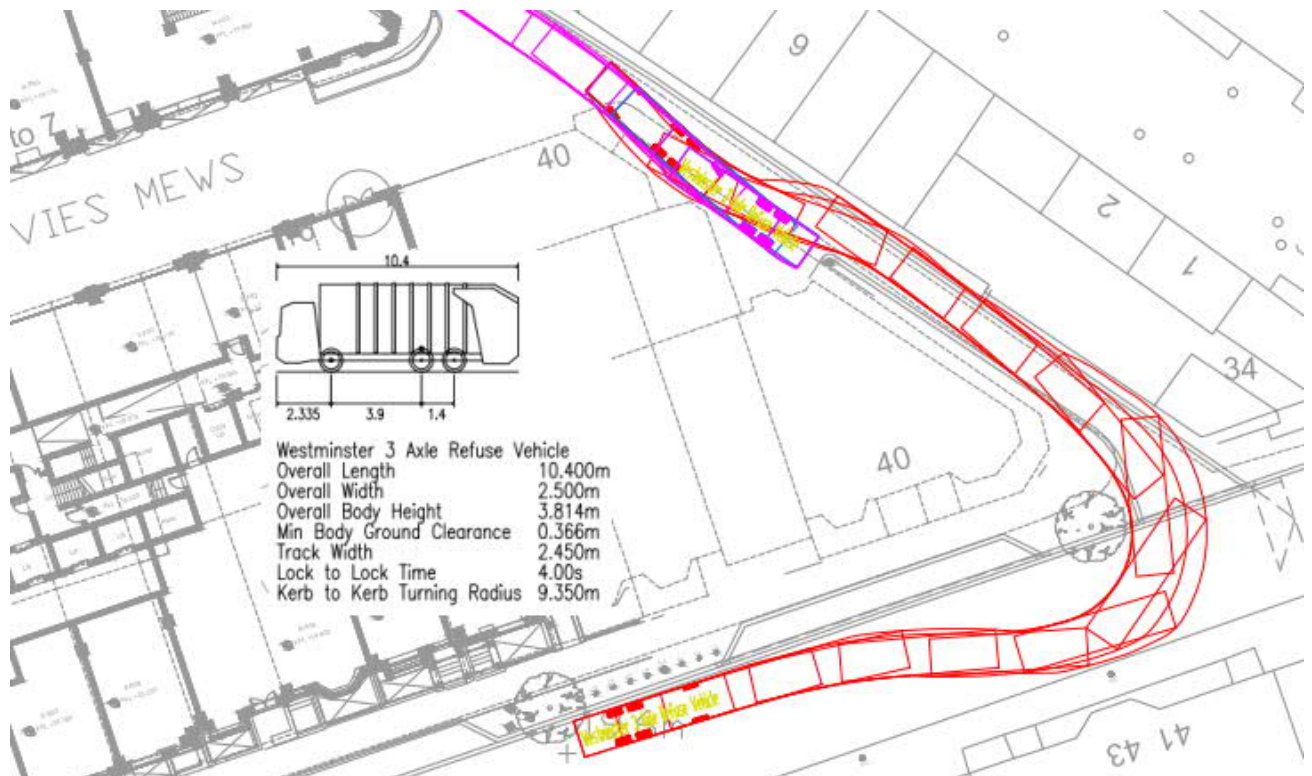
Figure 4-4 – RCV Parking Location



4.3.12. Once the bins have been emptied, the FM team will return them to the main waste storage area at lower ground floor level.

4.3.13. **Figure 4-5** show the swept path assessment for the RCV.

Figure 4-5 – RCV Swept Path



5 SOUTH MOLTON STREET PROPERTIES

5.1 INTRODUCTION

- 5.1.1. This section outlines the plan which will be adopted to successfully manage the residential and retail wastes arising from 10, 15 to 22, 23 to 25, 27 and 42 South Molton Street.
- 5.1.2. It is proposed that the South Molton Street Properties will provide the following:
No. 10, 15 to 22 and 42
- 5.1.3. It is proposed that retail (Classes A1 and A4) will be provided at ground and basement levels, and private residential (Class C3) on the upper floors.
No. 23 to 25 and 27
- 5.1.4. It is proposed that retail (Class A1) will be provided at ground and basement levels, and affordable residential (Class C3) on the upper floors.

5.2 PROPOSED WASTE STRATEGY

Residential - Private and Affordable

- 5.2.1. Further to pre-application discussions with WCC, it has been agreed that providing centralised waste storage areas for the residential properties would negatively impact the ground floor retail units that would have to be reduced in size to provide these stores.
- 5.2.2. It is therefore been agreed that the individual occupiers of the residential units will store their wastes within their property and present their wastes on South Molton Street for collection by WCC through their existing Bags off Street (BOS)³ collection service.
- 5.2.3. Based on the Collections and Cleaning Street/Schedule Search on WCC's website, **Table 5-1** summarises the frequencies and times that residential refuse is collected from South Molton Street and **Table 5-2** summarises the frequencies and times that residential recycling is collected.

Table 5-1 – South Molton Street Refuse Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Street BOS*	Mon - Fri	06:30 – 08:30	Sat, Sun	06:30 – 08:30
		19:00 – 21:00		19:00 – 21:00
* BOS = Bags off Street				

³ Source: <http://transact.westminster.gov.uk/env/streetreport.aspx?Street=South%20Molton%20Street&USRN=8401034>

Table 5-2 – South Molton Street Recycling Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Street	Tues	07:00 – 12:00		

- 5.2.4. To comply with the operational requirements of the BOS collection service, the individual residents will need to present their bagged refuse and recyclable on-street immediately adjacent to their street facing door up to 30 minutes before the start of the collection periods detailed in **Tables 5-1** and **5-2**.
- 5.2.5. Any waste not presented by the start of the relevant collection period may not be collected and could be the subject to enforcement action by WCC.

Commercial - Retail

- 5.2.6. The commercial retail units will face onto South Molton Street and South Molton Lane and will be classified as use classes A1 and A3.
- 5.2.7. In line with the current retail waste collection strategy for the existing retailers on South Molton Street and the surrounding area, it is proposed that the individual retail tenants will provide waste storage facilities as part of their fit-out process which will be sized to accommodate the actual volumes of waste that they will generate.
- 5.2.8. The individual tenant's will be responsible for managing their own waste storage areas including the collection and segregation of their wastes and will appoint a suitably licenced commercial waste management contractor to collect the waste.
- 5.2.9. The individual tenant's will ensure that their appointed waste management contractor complies with WCC's BOS policy that provides prescribed time windows when waste collections can take place and will only present their waste on-street for collection no more than 30 minutes prior to the start of the collection period.
- 5.2.10. Based on the Collections and Cleaning Street/Schedule Search on WCC's website, **Table 5-3** summarises the frequencies and times that commercial refuse is collected from South Molton Street and **Table 5-4** summarises the frequencies and times that commercial recycling is collected.

Table 5-3 – South Molton Street Refuse Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Street BOS*	Mon - Fri	06:30 – 08:30	Sat, Sun	06:30 – 08:30
		19:00 – 21:00		19:00 – 21:00

* BOS = Bags off Street

Table 5-4 – South Molton Street Recycling Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Street	Mon - Fri	18:00 – 20:00	Sat, Sun	18:00 – 20:00

- 5.2.11. Based on the Collections and Cleaning Street/Schedule Search on WCC's website, **Table 5-5** summarises the frequencies and times that commercial refuse is collected from South Molton Lane and **Table 5-6** summarises the frequencies and times that commercial recycling is collected.

Table 5-5 – South Molton Lane Refuse Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Lane BOS*	Mon - Fri	06:30 – 08:30	Sat, Sun	06:30 – 08:30
		16:00 – 18:00		
* BOS = Bags off Street				

Table 5-6 – South Molton Lane Recycling Collection Schedule

Location	Week Days	Week Times	Weekend Days	Weekend Times
South Molton Lane	Mon - Fri	18:00 – 20:00	Sat, Sun	18:00 – 20:00

6 SUMMARY AND CONCLUSIONS

6.1 SUMMARY

THE NORTH BLOCK AND SOUTH BLOCK

- 6.1.1. The Proposed Development is a commercial scheme consisting of retail, food and beverage, pub (with rooms), education or training centre, and office uses.
- 6.1.2. The proposed waste management strategy will provide a central main storage area at ground floor level within the North Block. This waste storage area will be used to store all the retail and office wastes generation within the development.
- 6.1.3. All tenants will be required to provide waste storage areas within the tenanted area that have sufficient space to segregate their waste.
- 6.1.4. At regular intervals the tenants will transport their waste to the main waste storage area, where they will place it into the labelled bins.
- 6.1.5. Wherever possible, waste will be transported to the main waste storage area using back of house corridors.
- 6.1.6. Retail units at ground floor level without basement access in the South Block will be required to transport their waste via the basement using the service lifts to transition between levels.
- 6.1.7. Retail units N.R01 and N.R04 do not have access to back of house service corridors, and therefore the tenants will transport their waste to the main waste storage area via the shortest route through the public realm.
- 6.1.8. The on-site FM team will manage the main waste storage area including rotating bins and baling the paper and cardboard.
- 6.1.9. On a daily basis the appointed commercial waste contractor will park their RCV on South Molton Lane and will collect the waste directly from the main waste storage area.

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- 6.1.10. The Proposed Development is a boutique hotel with a restaurant and bar.
- 6.1.11. The hotel will be provided with a main waste storage area at basement level that has sufficient waste storage based on a daily waste collection. In line with the Guidance, the store has been sized to store the equivalent of two days waste.
- 6.1.12. Due to the size of the service lift provided to service the hotel are refuse and recyclables materials will be stored in 360 litre wheeled bins and food waste will be stored in 240 litre wheeled bins.
- 6.1.13. The hotel operator will be responsible for managing the main waste storage area including segregating their waste into the appropriately labelled bins, and for appointing a suitably licenced waste management contractor.
- 6.1.14. Prior to the agreed collection times the hotel operator's staff or their appointed FM team will transfer the bins from the main waste storage area to the waste presentation area which is located adjacent to South Molton Lane.

- 6.1.15. The appointed waste management contractor will park their RCV in the loading bay on South Molton Lane and will collect the bins from the waste presentation area.
- 6.1.16. Once the bins have been emptied, the hotel operator's staff or their appointed FM team will return the bins to the main waste storage area at basement level.

SOUTH MOLTON STREET PROPERTIES

- 6.1.17. The proposed South Molton Street Properties will provide retail space at ground floor level and basement level and residential properties (both private and affordable) on the upper levels.

Residential Waste

- 6.1.18. The individual residents will store their waste within their own properties until it is presented for on street collection.
- 6.1.19. It has been agreed with the planning officers at WCC that the proposed residential properties will be able to participate in the existing BOS service operated by WCC on South Molton Street, which provides a twice daily collection of refuse and a weekly collection of recyclables.
- 6.1.20. Each resident will be required to present their waste directly on South Molton Street no more than 30 minutes prior to the start of the stated collection period.

Commercial - Retail Waste

- 6.1.21. The individual retailers will be required to provide a suitably sized waste storage area within their tenanted area as part of their fit out and for appointing a suitable licenced waste management contractor.
- 6.1.22. The individual tenant's will ensure that their appointed waste management contractor complies with WCC's BOS policy that provides prescribed time windows when waste collections can take place and will only present their waste on-street for collection no more than 30 minutes prior to the start of the collection period.

6.2 CONCLUSIONS

- 6.2.1. This Waste Management Strategy has taken into account the need to lessen the overall impact of waste generation through minimisation, reuse and recycling of materials from the operational phase.
- 6.2.2. The Proposed Development meets the requirements of relevant waste policy and follows applicable guidance.

Appendix A

NATIONAL, LONDON AND LOCAL
WASTE POLICY & GUIDANCE



National Waste Policy

National Planning Policy Framework (2019)⁴

The National Planning Policy Framework, published in 2012 and updated in February 2019, sets out the government's planning policies for England and how these are expected to be applied.

The following extracts are of relevance to the Proposed Development:

"2. Achieving sustainable development

...

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

...

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

National Planning Policy for Waste (2014)⁵

The National Planning Policy for Waste replaced *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 *Our Waste, Our Resources: A Strategy for England*.

The Policy includes the following which is of relevance to the Proposed Development:

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

- *new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape.'*

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.

⁴ Ministry of Housing, Communities and Local Government (MHCLG) (2019) *National Planning Policy Framework* [\[Link\]](#)

⁵ MHCLG (2014) *National Planning Policy for Waste* [\[Link\]](#)

⁶ Department for Environment, Food and Rural Affairs (Defra) (2018) *Our Waste, Our Resources: A Strategy for England* [\[Link\]](#)

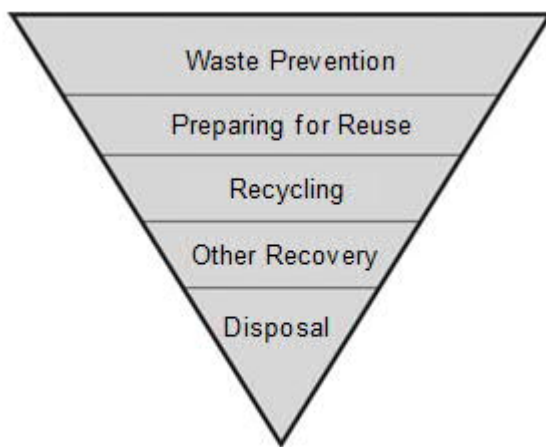
It combines actions the country will take now, with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. This is the blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity,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

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**.

Figure A1.1: The Waste Hierarchy



Source: Waste Framework Directive

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.

London Waste Policy & Guidance

London Environment Strategy⁷

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.

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).'

The London Plan: Spatial Development Strategy for Greater London - Consolidated with Alterations since 2011 (2016)⁸

The London Plan is the 'strategic plan setting out an integrated social, economic and environmental framework for the future development of London'.

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

Policy 5.16 Waste self-sufficiency

The Mayor will work with London boroughs and waste authorities, the London Waste and Recycling Board (LWARB), the Environment Agency, the private sector, voluntary and community sector groups, and neighbouring regions and authorities to:

- *manage as much of London's waste within London as practicable, working towards managing the equivalent of 100% of London's waste within London by 2031;*

⁷ Greater London Authority (GLA) (2018) *London Environment Strategy* [\[Link\]](#)

⁸ GLA (2016) *The London Plan: Spatial Development Strategy for Greater London - Consolidated with Alterations since 2011* [\[Link\]](#)

- *create positive environmental and economic impacts from waste processing, and*
- *work towards zero biodegradable or recyclable waste to landfill by 2031.*

This will be achieved by targeting the following:

- *minimising waste;*
- *encouraging the reuse of and reduction in the use of materials;*
- *exceeding recycling/composting levels in commercial and industrial waste of 70% by 2020;*
- *improving London's net self-sufficiency through reducing the proportion of waste exported from the capital over time, and*
- *working with neighbouring regional and district authorities to co-ordinate strategic waste management across the greater south-east of England.'*

Intend to Publish London Plan 2019 (December 2019)⁹

The 'Intend to Publish' version of the London Plan shows all of the Mayor's suggested changes following the Examination in Public of the draft Plan.

The following extracts are of relevance to waste management at the Proposed Development:

'Policy D6: Housing quality and standards

...E. Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.'

...

'Table 3.2 Qualitative design aspects to be addressed in housing developments

...

Usability and ongoing maintenance

The development should ensure that:

- recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services.'

'Policy SI 7 Reducing waste and supporting the circular economy

⁹ GLA (2019) *Intend to Publish London Plan 2019* - <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

- A. *Resource conservation, waste reduction, increases in material reuse and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:*
- 1) *promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible*
 - 2) *encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products*
 - 3) *ensure that there is zero biodegradable or recyclable waste to landfill by 2026*
 - 4) *meet or exceed the municipal waste recycling target of 65 per cent by 2030*
 - 5) *meet or exceed the targets for each of the following waste and material streams:*
 - a) *construction and demolition – 95 per cent reuse/recycling/recovery*
 - b) *excavation – 95 per cent beneficial use*
 - 6) *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.*
- B. *Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:*
- 1) *how all materials arising from demolition and remediation works will be reused and/or recycled*
 - 2) *how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and reused at the end of their useful life*
 - 3) *opportunities for managing as much waste as possible on site*
 - 4) *adequate and easily accessible storage space and collection systems to support recycling and reuse*
 - 5) *how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy*
 - 6) *how performance will be monitored and reported.'*

'Policy SI 8 Waste capacity and net waste self-sufficiency

...

- D *Development proposals for materials and waste management sites are encouraged where they:*
- 1) *deliver a range of complementary waste management and secondary material processing facilities on a single site*
 - 2) *support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets*

- 3) *contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste'*

LWARB, Waste Management Planning Advice for New Flatted Properties – Project Report¹⁰

This report provides guidance as well as template policies on planning for waste and recycling storage and collection in new build flatted properties.

The following extract is relevant to the Proposed Development with regards to waste management:

'6.3 Implementation

Systems that encourage management methods at or near the top of the waste hierarchy form a key part of a sustainable development e.g. CHP, onsite food digestion and vacuum systems are all part of the mix. Plans/systems for the separate collection of food waste are essential to meet high recycling targets.

Planning and design needs to ensure that facilities are convenient for residents, easy to use and attractive, to allow a 'recycling culture' to exist in new, flatted developments.'

Local Waste Policy & Guidance

Westminster's City Plan (2016)¹¹

Westminster's Local Development Framework is a 'portfolio' of documents which together provide a comprehensive local policy framework for the city. The main document is the local plan, Westminster's City Plan. This will include both strategic and more detailed policies to manage the city and deliver Westminster's future sustainable development.

The following policy extract is considered to be of relevance to the management of waste at the Proposed Development:

'Policy S44 Sustainable Waste Management

The council will require the minimisation of waste, the increase in the re-use, recycling and composting of waste, and the reduction in the amount of waste disposed at landfill in order to contribute towards the waste reduction targets set out in the London Plan.

In order to ensure sufficient opportunities for the provision of waste management facilities in appropriate locations, in accordance with the London Plan waste apportionment, the council will;

¹⁰ London Waste and Recycling Board (LWARB) (2014) *Waste Management Planning Advice for New Flatted Properties – Project Report* [\[Link\]](#)

¹¹ WCC (2016) *Westminster's City Plan*

<https://www.westminster.gov.uk/westminsters-city-plan-strategic-policies>

- *Protect existing waste and recycling management sites, protect any new street cleansing depots, micro-recycling centres and in-vessel composters which are secured during the lifetime of the plan, and require the equivalent or increased capacity as part of any development that would result in the loss of any or all of a designated waste site.*
- *Require major new development to provide on-site recycling and composting waste management facilities, except where the council considers that it is inappropriate or unfeasible to do so. In such cases, new facilities will be provided off-site and may include shared provision with another development or an existing waste facility in the vicinity that has capacity, except where the council considers that it is inappropriate or unfeasible to do so. Where it is not possible to provide either on-site, off-site or shared waste facilities, a payment in lieu will be required to a Waste Management Fund to allow the council to provide suitable facilities in the vicinity.*
- *Identify potential new locations suitable for waste management facilities during the lifetime of Westminster's City Plan using the following criteria:*
 - *Proximity to source of the waste;*
 - *The nature and scale of the facility;*
 - *Any potential impact on the surrounding area including noise, emissions, odour and visual impact;*
 - *The full transport impact of all collection, transfer and disposal movements, including maximising opportunities for transport by rail or water; and*
 - *The need to use sites that are currently in industrial use or are existing waste management sites.*
- *Secure any new waste sites identified during the lifetime of the plan, other than street cleansing depots, micro-recycling centres and in-vessel composters, within a Waste Development Plan Document.*
- *Work in partnership with the objective of securing joint working arrangements with other London Boroughs in order to pool waste apportionment, and set out these arrangements within a Waste Development Plan Document.'*

WCC, Waste and Recycling Storage Requirements (Development Division 2018-2019)¹²

WCC's Guidance Waste & Recycling Storage Requirements provides detail on the required storage facilities for waste and recycling from the Proposed Development and has been referred to in the development of this waste strategy.

¹² WCC (2019) *Waste and Recycling Storage Requirements (Development Division 2018-2019)*
https://www.westminster.gov.uk/sites/default/files/waste_storage_requirements.pdf

The Guidance states:

'When a new development, extension of change of use is submitted for approval the scheme will be assessed to ensure that adequate storage facilities are provided for waste and recyclable material. This requirement should therefore be considered at the earliest stages of the design process and details included on drawings submitted to the Council when applying for planning permission.'

WCC, Waste Enforcement Policy (2016)¹³

This policy sets out how WCC will use the powers available to them ensure an effective, consistent and clear approach to enforcement. It outlines the requirements for businesses regarding waste management including timed collections and identifies the applicable legislation.

¹³ WCC Waste Enforcement Policy

http://transact.westminster.gov.uk/docstores/publications_store/Waste/waste_enforcement_policy.pdf



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