

Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell

Kensington Forum Hotel – London

WASTE MANAGEMENT STRATEGY | APRIL 2019

wsp



Queensgate Investments Ltd.

**KENSINGTON FORUM, CROMWELL ROAD
(UPDATE)**

Waste Management Strategy

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Queensgate Investments **Ltd.**

**KENSINGTON FORUM, CROMWELL ROAD
(UPDATE)**

Waste Management Strategy

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NATIONAL, LONDON AND LOCAL WASTE POLICY AND GUIDANCE

1. INTRODUCTION

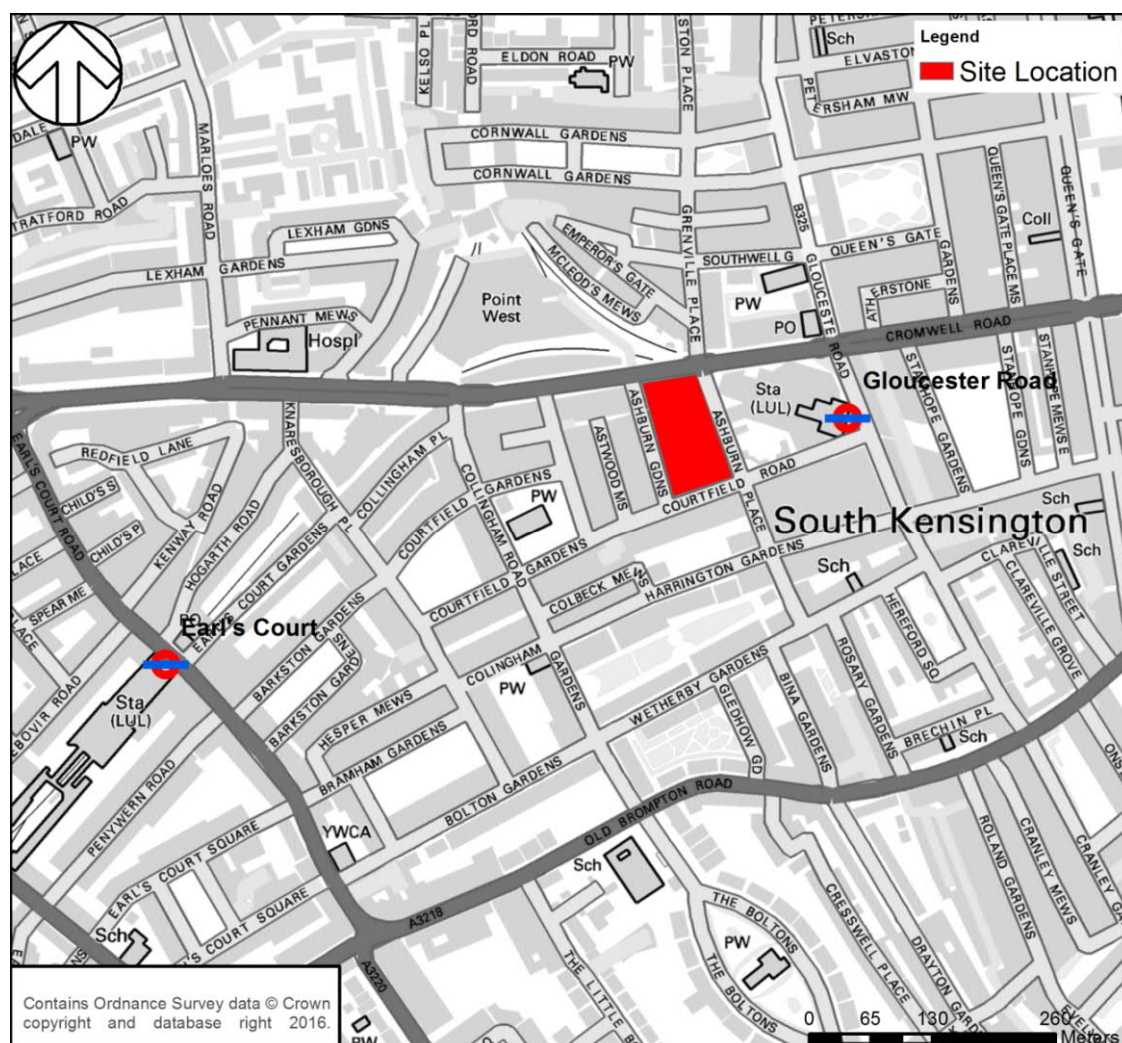
1.1. PROJECT BACKGROUND

- 1.1.1. WSP has been commissioned by Queensgate Investments Ltd. and Rockwell to prepare a Waste Management Strategy as part of a planning application for Kensington Forum, which is located within the Royal Borough of Kensington and Chelsea (RBKC).
- 1.1.2. This Waste Management Strategy considers the potential impacts that may arise from waste generated during the operational phase, 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. The site is bound by Cromwell Road to the north; Ashburn Place to the east; Ashburn Gardens to the west; and Courtfield Road to the south. The site is located near to Gloucester Road Underground Station, and the location of the site is shown in **Figure 1**.

Figure 1 - Site Location Plan



1.3. PROPOSED DEVELOPMENT DESCRIPTION

- 1.3.1. Comprehensive redevelopment and erection of part 30, part 22, and part 7 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities, and back of house areas; and new homes (including affordable homes) (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, and servicing areas; associated highway works; and creation of new publicly accessible open space with associated hard and soft landscaping.

1.4. REPORT STRUCTURE

- 1.4.1. 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 – Hotel & Serviced Apartments** - details the strategy which will be adopted to manage the operational waste arising from the hotel and serviced apartments.
- **Section 4: Management of Operational Waste - Residential** - details the strategy which will be adopted to manage the operational waste arising from the residential units.
- **Section 5: 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 e.g. 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 waste 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. This section contains focusses on the details of 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 outline below in revers chronological order:
- **Waste Management, The Duty of Care Code of Practice (2016 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.
 - **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 that 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 brought in by the Environmental Protection Act 1990.

2.3. NATIONAL & LOCAL WASTE POLICY

- 2.3.1. The relevant national, London and local Waste policy that was reviewed during the preparation of this Waste Management Strategy is outlined below and further detail provided in **Appendix A**:
- Department from Environment, Food and Rural Affairs (Defra), *Our Waste, Our Resources: A Strategy for England* (2018);

- 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) *Waste Management Plan for England* (2013);
- Greater London Authority (GLA), *London's Wasted Resource: The Mayor's Municipal Waste Management Strategy* (2011);
- (GLA), *Making Business Sense of Waste: The Mayor's Business Waste Strategy for London* (2011);
- (GLA), *The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011* (2016);
- RBKC, *Consolidated Local Plan* (2015);
- RBKC, *Transport and Streets SPD* (April 2016);
- RBKC, *Local Plan Partial Review* (2018).

3. MANAGEMENT OF OPERATIONAL WASTE - HOTEL & SERVICED APARTMENTS

3.1. INTRODUCTION

3.1.1. This section outlines the proposed strategy that will be used to manage the waste arising from the hotel and serviced apartments located within the Proposed Development.

3.2. WASTE GENERATION MODEL

Hotel

3.2.1. The Proposed Development consists of a 749 bedroom, 4 star hotel, including a 1,500 seat ballroom, conference facilities, restaurants, bars and a gym.

3.2.2. It has been assumed that the waste generation model for the hotel element will be based on the 4/5 star hotel waste metric sourced from British Standard *BS5906:2005 Waste management in buildings – Code of practice* (BS59056:2005).

3.2.3. It is important to note that the 4/5 star hotel waste metric outlined above is assumed to include allowances for all activities within a generic high quality hotel including associated food and beverage activities.

3.2.4. However, following a review of the Proposed Development, it has been concluded that there are a number of waste sources that cannot be reasonably assumed to be included within the proposed waste generation metric. These include:

- The Ballroom: This is deemed to be outside of the scope of a typical 4/5 star hotel, and therefore an extra allowance will be made based on the restaurant waste metric sourced from BS5906:2005, assuming 50% utilisation.
- Food and Beverage: The proposed food and beverage provision will not be for the sole use of the hotel guests, as the general public will be permitted to use them. Therefore, an extra allowance will need to be added to the waste model to reflect the additional waste arising. It is therefore proposed to make an extra allowance equivalent to 50% of the waste generated by the food and beverage provisions based on the restaurant waste metric sourced from BS5906:2005.

3.2.5. **Table 1** summarises the relevant waste generation metrics from BS5906:2005.

Table 1 - BS5906:2005 Waste Metrics

Description	BS5906:2005 Metric / Week
4/5 Star Hotel	Volume per bedroom [350 litre] x number of bedrooms
Ball Room	Volume per number of covers [75 litres]
Restaurant	Volume per number of covers [75 litres]

3.2.6. **Table 2** summarises the proposed commercial provision and the estimated waste arising within the Proposed Development, based on the above weekly waste metrics.

Table 2 - Estimated Waste Arising (Weekly)

Use Classification	Quantum	Waste Generation (Litres/Week)
4/5 Star Hotel (C1)	749 Keys	262,150
Ball Room (A3)	1,500 Covers	56,250**
Extra Waste Allowances – Public Access		
Food and Beverage*	1,783m ²	11,144***
TOTAL (Litres/Week)		329,544
<p>* Assumed worst case scenario of A3 use.</p> <p>** Assumes that the ballroom will be 50% utilised.</p> <p>*** Extra allowance for general public access, equivalent to 50% of the total weekly waste generation level. Assumes 1 cover per 6m².</p>		

3.2.7. The following collection frequencies have been assumed for the commercial waste (**Table 3**).

Table 3 - Commercial Waste Collection Frequencies

Use Classification	Collection Frequency
All Commercial Uses	Daily

Serviced Apartments

3.2.8. The Proposed Development also includes serviced apartments, which will generate commercial waste as the tenants will not pay Council Tax directly to RBKC.

3.2.9. The weekly waste generation levels for the serviced apartments have been based on RBKC's residential waste generation metrics summarised in **Table 4**.

Table 4 - RBKC Residential Waste Generation Metrics (Weekly)

Waste Stream	Waste Generation Metric
Serviced Apartments	One Eurobin (or equivalent) for every 18 residents*
* Based on total occupants	

3.2.10. This waste metric has been used as the serviced apartments have dedicated kitchen areas, and therefore the waste stream is likely to be similar to the composition and volumes of a typical domestic residence, rather than a hotel.

3.2.11. It should be noted that whilst the RBKC residential waste generation metric has been used, the waste stream will be managed and collected through a commercial waste collection contractor.

3.2.12. **Table 5** summarises the accommodation schedule and the assumed occupation levels for the serviced apartments within the Proposed Development.

Table 5 - Serviced Apartments – Accommodation and Occupation Schedule

Use Class	Number of Bedrooms				TOTAL
	Studio	1 Bed	2 Bed	3 Bed	
Occupation Levels (Persons/Flat)	1	2	4	6	
Serviced Apartments	70	201	67	2	340
TOTAL (Persons)	70	402	268	12	752

3.2.13. **Table 6** outlines the estimated weekly waste arising from the serviced apartments.

Table 6 - Estimated Total Waste Arising – Weekly Collection

Use Class	1,100 Litre Eurobins / Week (No.)
Service Apartments	42*
* Rounded	

3.2.14. The collection frequencies that have been assumed for serviced apartments are shown in **Table 3**.

3.3. PROPOSED WASTE MANAGEMENT STRATEGIES

Hotel

- 3.3.1. The proposed waste management strategy for the hotel assumes that the operator will take responsibility for managing all the waste arising from the hotel, and for appointing a suitable commercial waste contractor to collect it.
- 3.3.2. The hotel waste strategy has been broken down into the following stages.
- 3.3.3. **Stage 1:** The hotel operator will be required to provide interim waste storage areas within their premises as part of their fit-out, and these will act as short-term waste storage areas prior to transportation of the waste to the main commercial waste stores.
- 3.3.4. The interim waste stores should have sufficient capacity to allow refuse and recycling to be segregated. The size/capacity of the interim waste store(s) should be sufficient to accommodate the volumes of waste generated in the specific areas, based on the frequency that the waste will be transferred to the main commercial waste stores.
- 3.3.5. **Stage 2:** The hotel operator's Facilities Management (FM) team will regularly collect the waste from the interim waste stores, and will transport it directly to the main commercial waste stores at basement level 2, where they will segregate the waste into the appropriately labelled bins.

3.3.6. **Stage 3:** The main commercial waste stores will be used to store the commercial waste generated by the hotel and the serviced apartments.

3.3.7. The size and location of the main commercial waste stores are detailed in **Section 3.4.**

Serviced Apartments

3.3.8. The proposed waste strategy assumes that the hotel operator will also be responsible for managing the wastes generated within the serviced apartments.

3.3.9. The serviced apartments waste strategy has been broken down into the following stages.

3.3.10. **Stage 1:** Each of the serviced apartment will be provided with a segregated waste bin, which will be fixed into an appropriate kitchen unit.

3.3.11. An example of a suitable segregated waste bin is shown in **Figure 2.**

Figure 2 - Example Segregated Waste Bin1



3.3.12. The segregated waste bin shown in **Figure 2** includes the following bin capacities:

- Recyclables: 30 litres; and
- Refuse: 19 litres.

3.3.13. The proposed segregated waste bin will be fitted into a single kitchen unit with a minimum width of 500mm.

3.3.14. **Stage 2:** The hotel operator's FM team will collect the waste directly from the serviced apartments on a daily basis, and will transport it to the main commercial waste stores at basement level 2, where they will segregate the waste into the appropriately labelled bins.

¹ The Code Store: <http://www.thecodestore.co.uk/shop/details/291/213/waste/was1-storage-of-non-recyclable-waste-and-recyclable-household-waste/built-in-kitchen-bins/easy-cargo-49-litre-waste-bin.html>

3.3.15. The main commercial waste stores will be used to store the commercial waste generated by the hotel and the serviced apartments.

3.3.16. The size and location of the main commercial waste stores are detailed in **Section 3.4**.

3.4. MAIN COMMERCIAL WASTE STORES

3.4.1. The main commercial waste stores will be the location that all waste generated by the hotel and serviced apartments will be stored prior to collection by the commercial waste contractor appointed by the hotel operator.

3.4.2. Based on the estimated waste volumes in **Tables 2** and **6**, **Table 7** summarises the total number of bins to be provided in the main commercial waste stores, based on a daily waste collection.

Table 7 - Bin Provisions

Use Class	Weekly Collection		Daily Collection*	
	Volume (Litres)	1,100 Litre Eurobins / Week (No.)	Volume (Litres)	1,100 Litre Eurobins / Week (No.)
Hotel	329,544	300	47,078	43
Service Apartments	n/a	42	n/a	6
TOTAL	n/a	342	n/a	49

* Assumes the provision of one day's waste storage.

3.4.3. The dimensions for the 1,100 litre Eurobins provided are summarised in **Table 8**.

Table 8 - Bin Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
1,100 litre Eurobin	1,260	990	1,380

3.4.4. In order to provide spare additional storage capacity extra over the number of bins shown in **Table 7**, it is proposed to provide a bin compactor that is suitable for a 1,100 litre Eurobin within the larger commercial waste storage area.

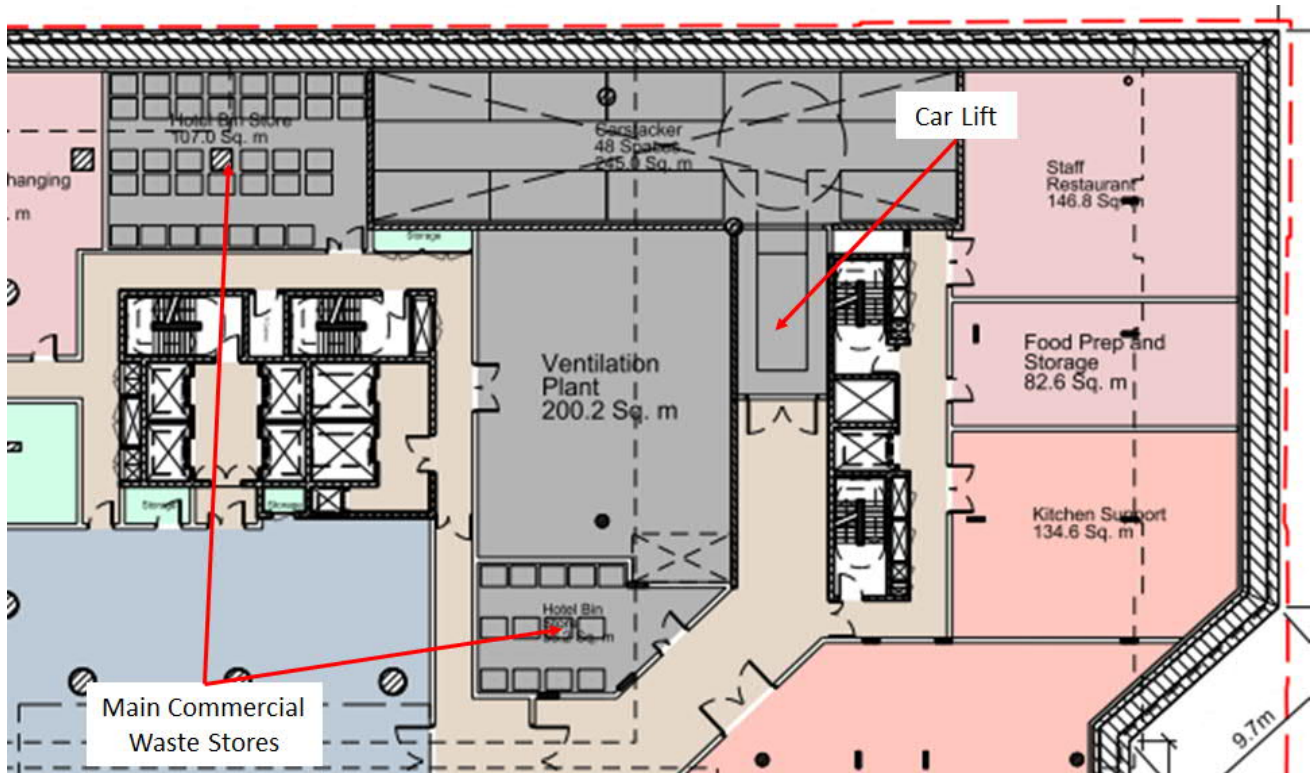
3.4.5. An example of a bin compactor is shown in **Figure 3**.

Figure 3 - Example Bin Compactor²



3.4.6. The main commercial waste stores will be located at basement level 2 as shown in **Figure 4**.

Figure 4 - Main Commercial Waste Stores



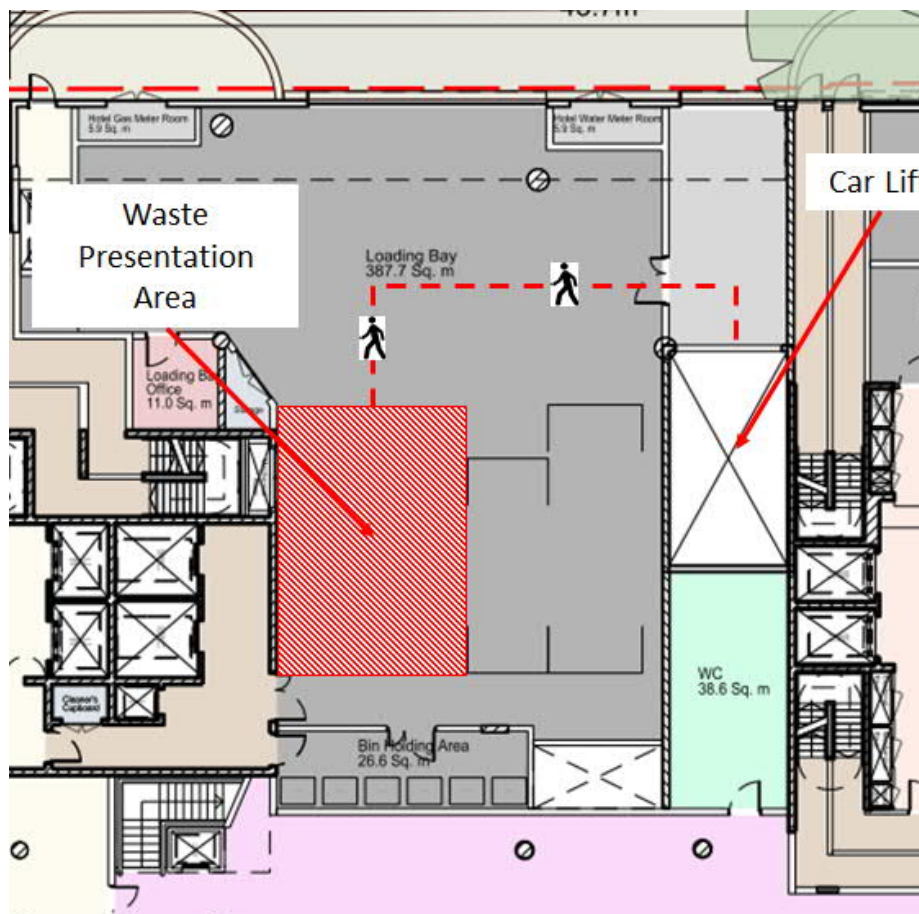
3.4.7. The process to manage waste presentation and collections is detailed in **Section 3.5**.

² Pakawaste Limited: https://www.pakawaste.co.uk/files/4113/6733/6457/LF1100_PK1129_2013.pdf

3.5. WASTE PRESENTATION AND COLLECTION

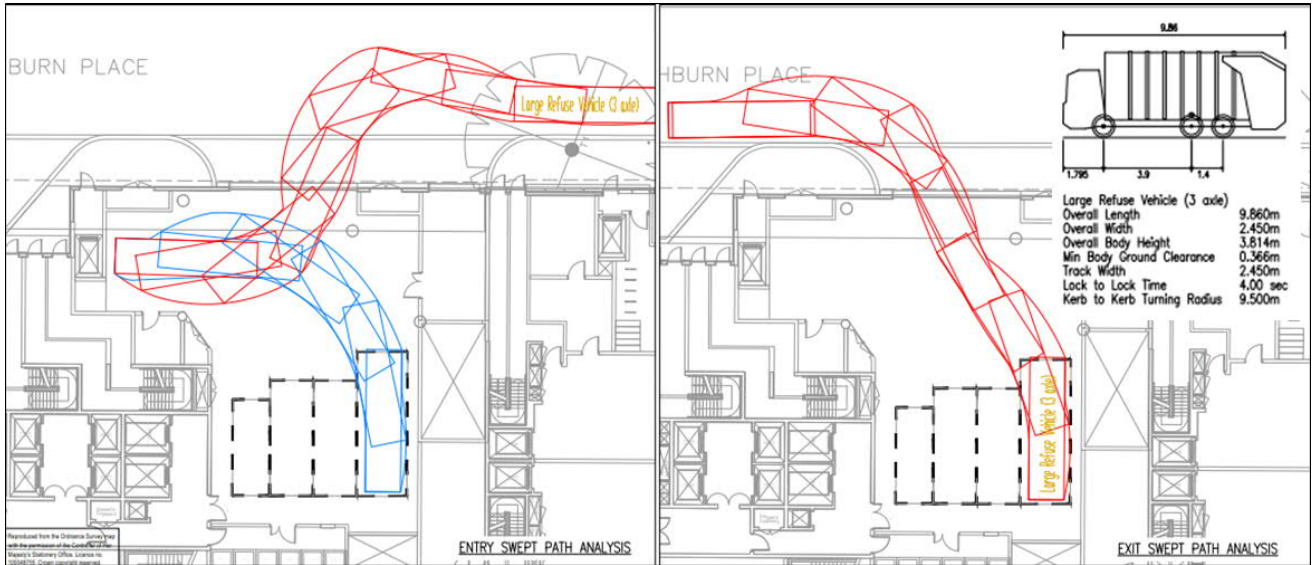
- 3.5.1. On a daily basis, the on-site FM team will move the bins from the main commercial waste stores to the waste presentation area at ground floor level using the car lift.
- 3.5.2. It is proposed that the waste will be presented in the vehicle loading bays within the service yard.
- 3.5.3. **Figure 5** shows the notional location of the waste presentation area within the service yard and the car lift.

Figure 5 - Waste Presentation Area and Car Lift



- 3.5.4. It is proposed that waste collections will occur during quiet periods of the day to avoid disrupting the service yard operation.
- 3.5.5. The swept path assessment for the Refuse Collection Vehicle (RCV) has been based on a 9.9m rigid vehicle. The swept paths are shown in **Figure 6**.

Figure 6 - RCV Swept Paths



3.5.6. The hotel operator will ensure that they procure waste collections from a waste commercial waste collection contractor with compliant vehicles.

4. MANAGEMENT OF OPERATIONAL WASTE - RESIDENTIAL

4.1. INTRODUCTION

4.1.1. This section outlines the plan which will be adopted to successfully manage the residential waste arising from the Proposed Development once operational.

4.2. WASTE GENERATION MODEL

4.2.1. Estimated residential waste generation has been quantified based on weekly waste generation metrics taken from RBKC's Transport and Streets SPD dated April 2016 (hereafter referred to as 'the Guidance').

4.2.2. The RBKC waste generation metric for residential developments (new build flats) is summarised below:

- One Eurobin (or equivalent) for every 18 residents.

4.2.3. **Table 9** summarises the accommodation schedule and the assumed occupation levels for the affordable residential units within the Proposed Development.

Table 9 - Residential – Accommodation and Occupation Schedule

Use Class	Affordable			
	Studio	1 Bed	2 Bed	3 Bed
Occupation Levels (Persons)	1	2	4	6
Residential	6	19	26	11
Sub-Total (Persons)	6	38	104	66
TOTAL (Persons)	214			

4.2.4. **Table 10** outlines the estimated weekly waste storage requirements for the affordable residential units.

Table 10 - Estimated Residential Waste Storage Requirements – Weekly Collection

Use Class	1,100 Litre Eurobins / Week (No.)
Refuse*	5**
Recyclables*	8**
TOTAL	13

* Assumes a 40/60 refuse and recycling split
 ** Rounded up

4.2.5. Based on the Guidance, **Table 11** summarises the collection frequencies that have been assumed for residential waste.

Table 11 - Assumed Residential Waste Collection Frequencies

Waste Type	Collection Frequency
Refuse	Weekly
Recyclables	Weekly

4.3. PROPOSED WASTE MANAGEMENT STRATEGY

4.3.1. The proposed waste management strategy for residential waste has been broken down into the following stages.

4.3.2. **Stage 1:** Each residential property will be provided with a segregated waste bin, which will be fixed into an appropriate kitchen unit.

4.3.3. An example of a suitable segregated waste bin is shown in **Figure 7**.

Figure 7 - Example Segregated Waste Bin³



4.3.4. The segregated waste bin shown in **Figure 7** includes the following bin capacities:

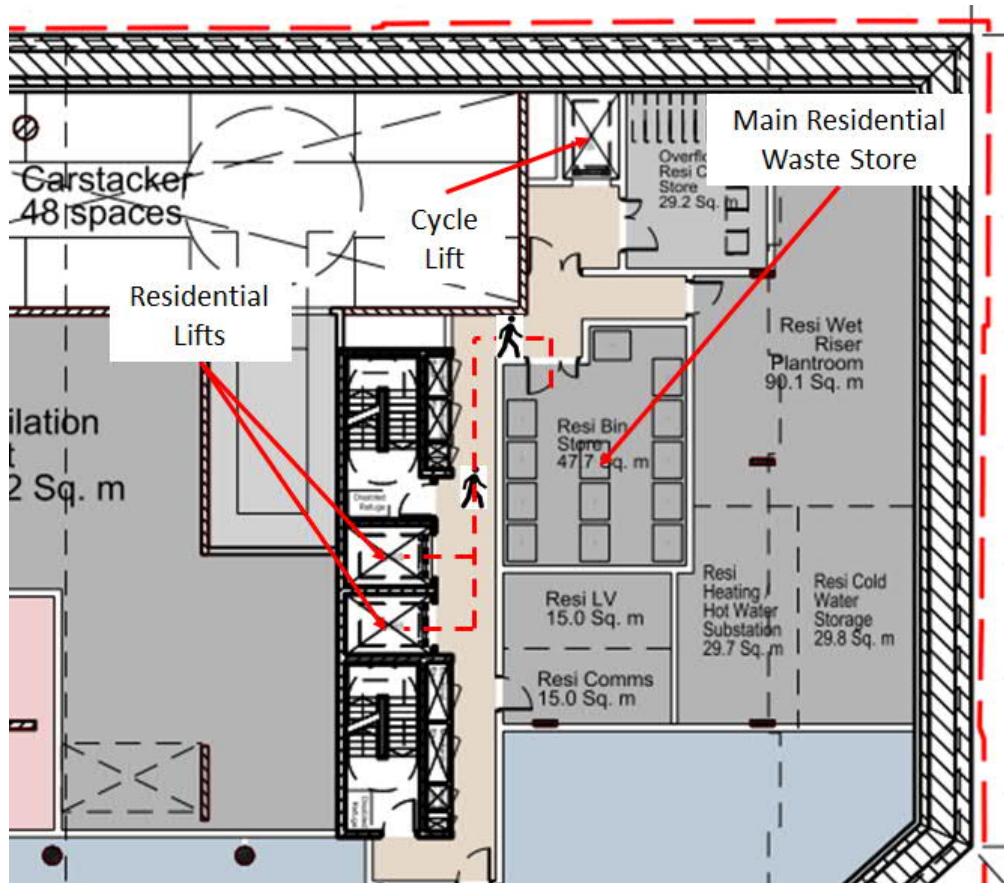
- Recyclables: 30 litres; and
- Refuse: 19 litres.

4.3.5. The proposed segregated waste bin will be fitted into a single kitchen unit with a minimum width of 500mm.

³ The Code Store: <http://www.thecodestore.co.uk/shop/details/291/213/waste/was1-storage-of-non-recyclable-waste-and-recyclable-household-waste/built-in-kitchen-bins/easy-cargo-49-litre-waste-bin.html>

- 4.3.6. **Stage 2:** In order to provide a waste storage area for the residential tenants that is within 30m horizontal walking distance of each dwelling, the main residential waste store will be provided at basement level 1, in close proximity to the residential service core.
- 4.3.7. The residents will be required to transport their own waste from their apartments directly to their nominated main residential waste store via the passenger lifts and common areas.
- 4.3.8. The location of the main residential waste store, passenger lifts and residential walking route are shown in **Figure 8**.

Figure 8 - Residential Waste Store Location, Passenger Lift and Walking Route



- 4.3.9. The total number of bins required in the main residential waste store will be as summarised in **Table 10**.
- 4.3.10. The dimensions for the 1,100 litre Eurobins are summarised in **Table 12**.

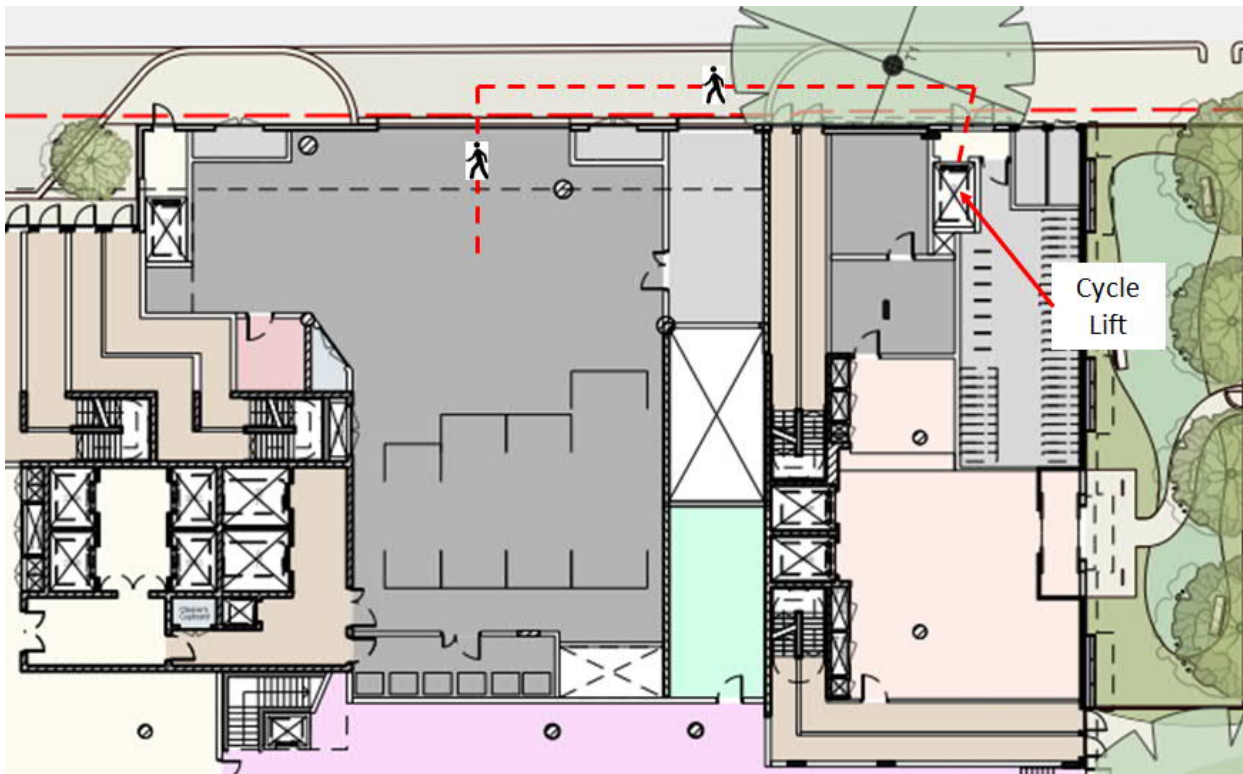
Table 12 - Bin Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
1,100 litre Eurobin	1,260	990	1,380

- 4.3.11. All bins will be fully labelled to maximise segregation of wastes.

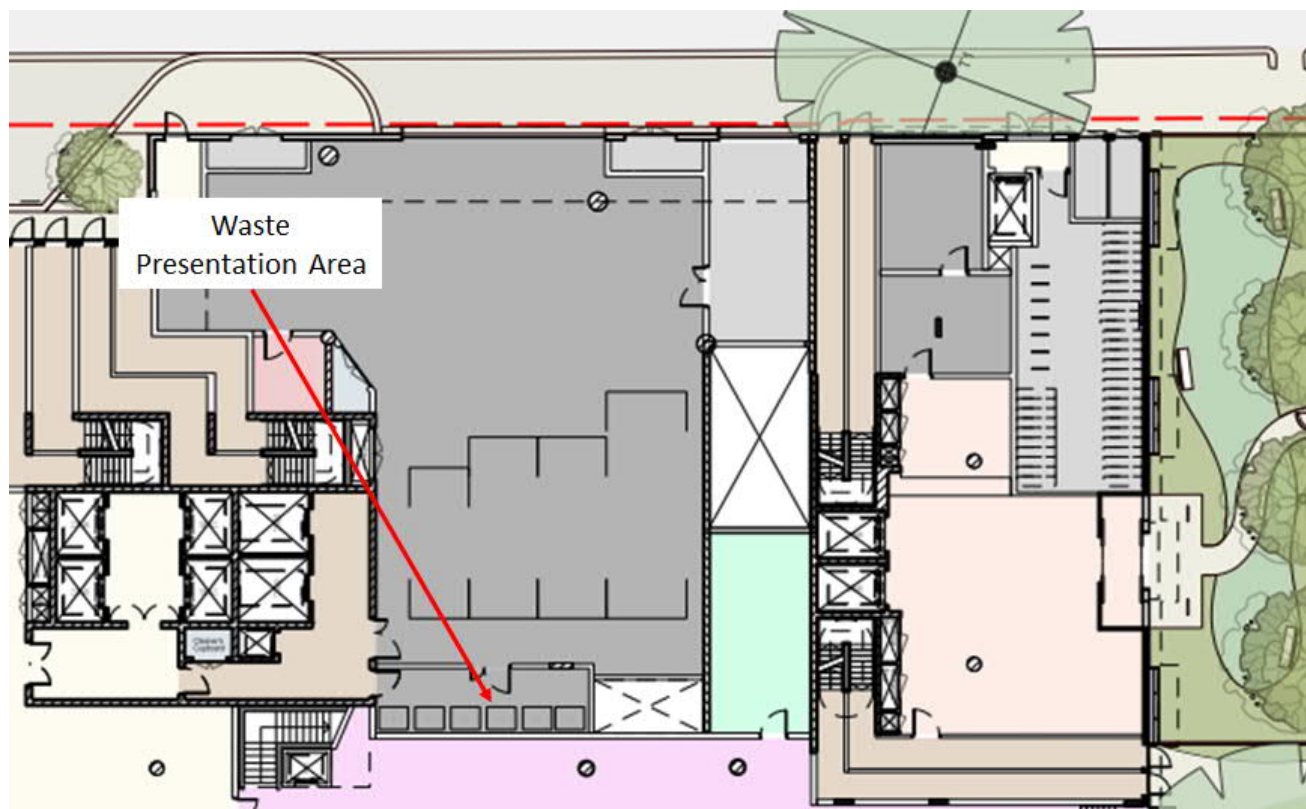
- 4.3.12. The main waste storage area will be designed in accordance with BS5906:2005 standards. In summary, the facility should include the following:
- A suitable water point in close proximity to allow washing down;
 - All surfaces sealed with a suitable wash proof finish (vinyl, tiles etc.);
 - All surfaces easy to clean;
 - Suitable floor drain; and
 - Suitable lighting and ventilation.
- 4.3.13. **Stage 3:** The main residential waste store will be managed by the on-site FM team who will be responsible for:
- Regularly monitoring the main residential waste store;
 - The cleanliness of the main residential waste store; and
 - Transporting the full bins to the waste presentation area for collection by RBKC.
- 4.3.14. **Stage 4:** Due to the location of the main residential waste store, RBKC will not collect the waste directly from this area, and therefore a waste presentation area will be provided at ground floor level.
- 4.3.15. On the nominated collection days, the on-site FM team will relocate the bins from the main residential waste store via the cycle lift to the waste presentation area located to the rear of the loading bays within the service yard at ground floor level.
- 4.3.16. The access route from the cycle lift to the presentation area within the service yard at ground floor level is shown in **Figure 9**.

Figure 9 - Access Route from Cycle Lift to Service Yard



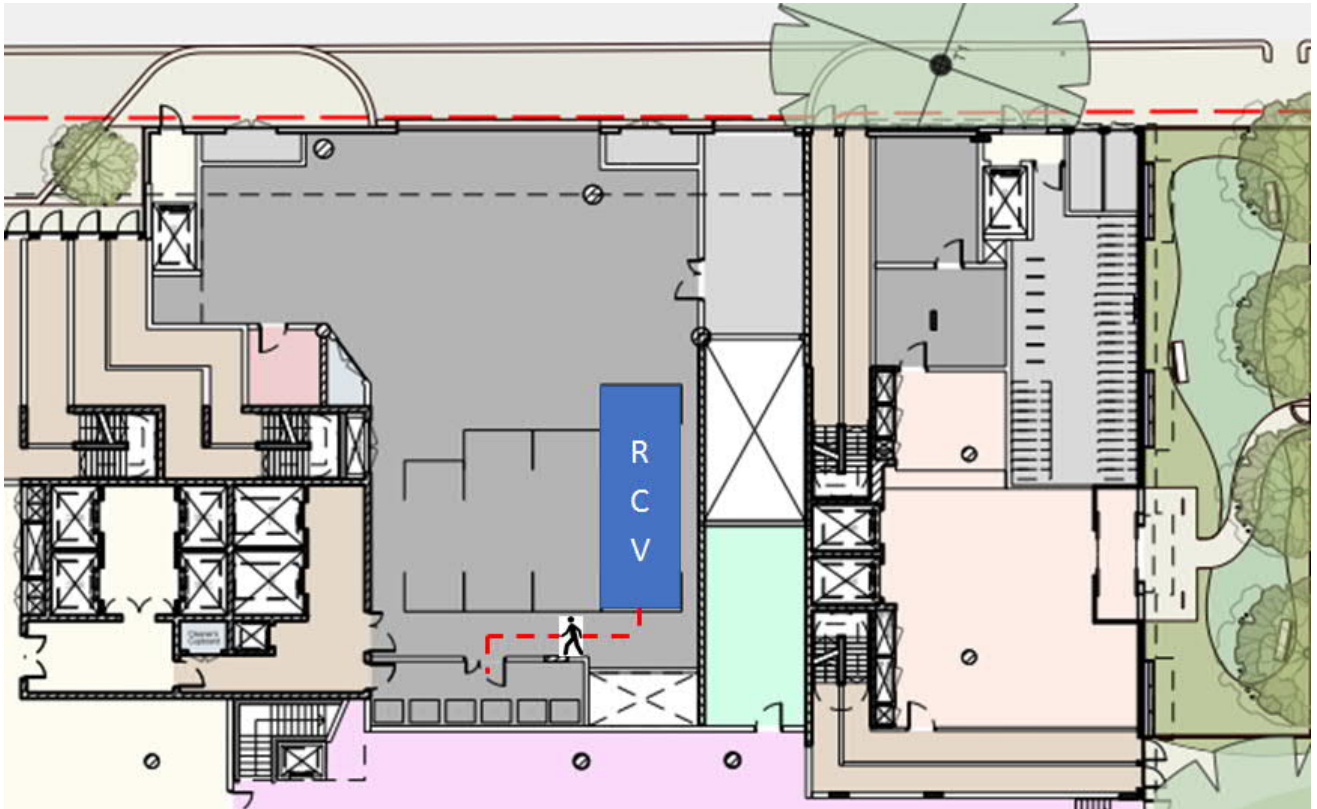
- 4.3.17. Based on the bin requirements summarised in **Table 10**, and on the assumption, that only the bins containing refuse or recyclables will be presented for collection at a given time, the waste presentation area will be required to have the capacity to store 8 No. Eurobins.
- 4.3.18. The on-site FM team will be responsible for managing the presentation of the bins within the designated area prior to the RBKC waste contractor arriving on-site.
- 4.3.19. The indicative location of the waste presentation area is shown in **Figure 10**.

Figure 10 - Waste Presentation Area Location



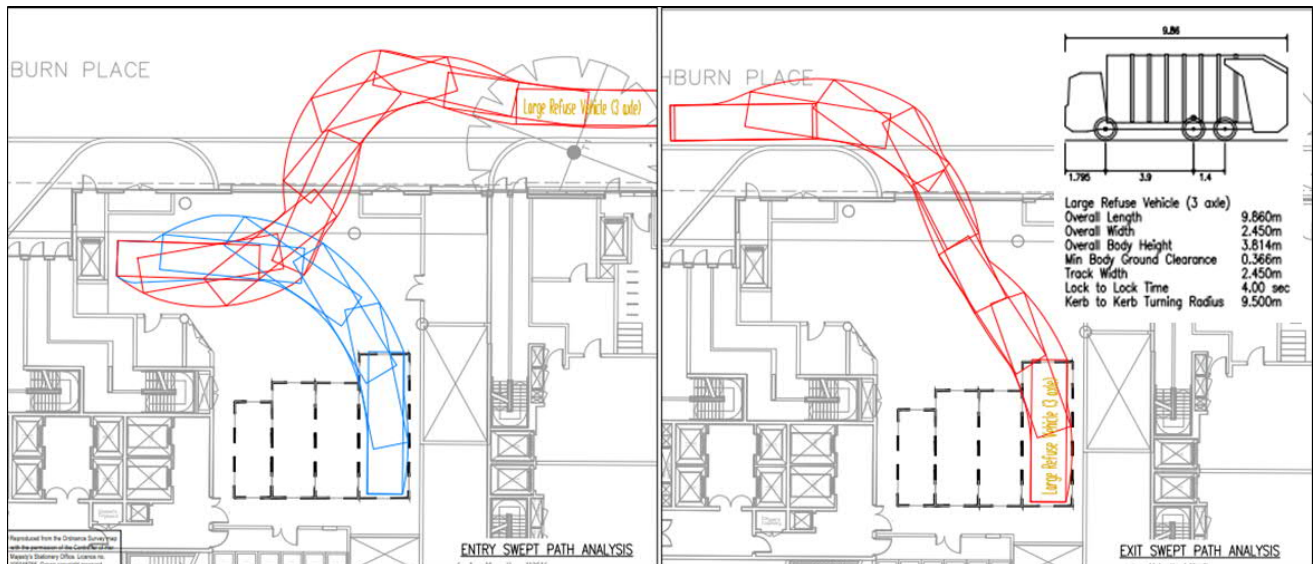
- 4.3.20. **Stage 5:** RBKC's waste collection contractor will park their RCV in the service yard adjacent to the waste presentation area. The access route provided for the RBKC waste collection contractor to transport the bins from the waste presentation area to the RCV is step free.
- 4.3.21. **Figure 11** shows the RCV parking location.

Figure 11 - RCV Parking Location



4.3.22. The swept path assessment for the RCV has been based on an 9.9m rigid vehicle. The swept paths are shown in **Figure 12**.

Figure 12 - RCV Swept Path



4.3.23. Once the bins have been emptied, the on-site FM team will return the bins to the main residential waste storage area via the cycle lift.

5. SUMMARY AND CONCLUSIONS

5.1. COMMERCIAL WASTE

5.1.1. The operator of the hotel will manage the waste arising from both the hotel and serviced apartments.

Hotel

5.1.2. Within the hotel, interim waste storage areas will be provided which are suitable for the specific business activities being undertaken, and encourage the segregation of refuse and recycling.

5.1.3. On a regular basis, the on-site FM team will remove the waste from the hotel interim waste storage areas and transport it directly to the main commercial waste stores at basement level 2, where they will segregate it into the appropriate containers.

Serviced Apartments

5.1.4. The serviced apartments will each incorporate sufficient internal waste storage containers to promote the separation of recyclable materials at source.

5.1.5. On a daily basis, the on-site FM team will collect the waste from each serviced apartment and will transport it to the main commercial waste stores at basement level 2, where they will segregate it into the appropriate containers.

Waste Presentation and Collection

5.1.6. The commercial waste stores will be the location that all waste generated within the hotel and serviced apartments is stored prior to collection. The commercial waste stores will have sufficient storage capacity to hold the equivalent of one day's waste generation.

5.1.7. To provide additional waste storage capacity, a bin compactor suitable for 1,100 litre Eurobins will be provided within the larger commercial store.

5.1.8. Prior to collection, the on-site FM team will transport the waste from the commercial waste stores to the waste presentation area within the service yard.

5.1.9. The waste management contractor appointed by the hotel operator will park their RCV in the service yard and will collect each waste stream from the waste presentation area.

5.1.10. Once the bins have been emptied, the on-site FM team will return them to the main commercial waste stores at basement level 2.

5.2. RESIDENTIAL WASTE

5.2.1. Each residential unit will incorporate segregated internal waste storage containers to promote the separation of recyclable materials at source.

5.2.2. Residents will be responsible for transporting the waste from their apartments to their nominated main residential waste store area at basement level 1, and for separating their recyclables into the appropriate containers.

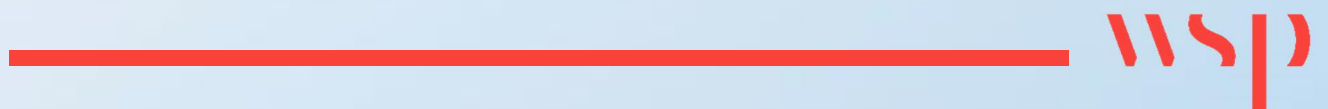
- 5.2.3. On collection days the on-site FM team will transport the bins containing either refuse or recyclables to the waste presentation area which is located to the rear of the vehicle loading bays within the service yard at ground floor level. RBKC's waste collection contractor will park their RCV adjacent to the waste presentation area and will collect the bins directly from the waste presentation area.
- 5.2.4. Once the bins have been emptied, the on-site FM team will return the bins to the basement level 1 residential waste storage areas.

5.3. CONCLUSION

- 5.3.1. This Waste Management Strategy has taken into account the need to lessen the overall impact of waste generation through reuse and recycling of materials from the operational phase of the Proposed Development.

Appendix A

NATIONAL, LONDON AND LOCAL
WASTE POLICY AND GUIDANCE



NATIONAL WASTE POLICY

Our Waste, Our Resources: A Strategy for England (2018)⁴

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

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

National Planning Policy Framework (2019)⁵

The revised National Planning Policy Framework was updated on 19 February 2019 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.

National Planning Policy for Waste (2014)⁶

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

Waste Management Plan for England (2013)⁷

The Waste Management Plan for England, published in December 2013, provides an analysis of the current waste management situation in England and fulfils the mandatory requirements of Article 28 of the revised Waste Framework Directive (WFD). The WFD required that Member States ensure

⁴ Department for Environment, Food and Rural Affairs (DEFRA) (2018) *Our Waste, Our Resources: A Strategy for England*

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

⁵ Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁶ DCLG (2014) *National Planning Policy for Waste*

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

⁷ Department for Environment, Food and Rural Affairs (DEFRA) (2013) *Waste Management Plan for England*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

that their competent authorities, in this instance Defra, establish one or more waste management plans covering all of their territory.

The Plan does not introduce new policies or change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan. It supersedes the previous waste management plan, the Waste Strategy for England 2007.

The mandatory requirements of Article 28 of the revised WFD specify that waste management plans must contain the following information:

- *'An analysis of the current waste management situation in the geographical entity concerned, as well as the measures to be taken to improve environmentally sound preparing for re-use, recycling, recovery and disposal of waste and an evaluation of how the plan will support the implementation of the objectives and provisions of the revised WFD.*
- *The type, quantity and source of waste generated within the territory, the waste likely to be shipped from or to the national territory, and an evaluation of the development of waste streams in the future;*
- *Existing waste collection schemes and major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste or waste streams addressed by specific Community legislation;*
- *An assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure in accordance with Article 16 (on the proximity principle), and, if necessary, the investments related thereto;*
- *Sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations, if necessary; and*
- *General waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems.*

In addition, Schedule 1 to the Waste (England and Wales) Regulations 2011 sets out other obligations for the Plan which have been transposed from the revised WFD. These other obligations include:

- *In pursuance of the objectives and measures in Directive 94/62/EC (on packaging and packaging waste), a chapter on the management of packaging and packaging waste, including measures taken pursuant to Articles 4 and 5 of that Directive.*
- *Measures to promote high quality recycling including the setting up of separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors.*
- *As appropriate, measures to encourage the separate collection of bio-waste with a view to the composting and digestion of bio-waste.*
- *As appropriate, measures to be taken to promote the reuse of products and preparing for reuse activities, in particular -*
 - (a) measures to encourage the establishment and support of reuse and repair networks;*

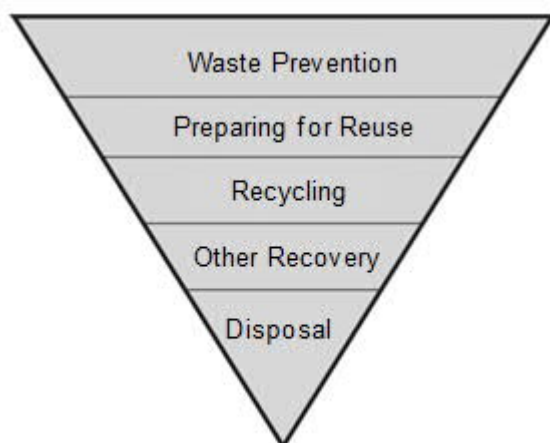
- (b) the use of economic instruments;
- (c) the use of procurement criteria; and
- (d) the setting of quantitative objectives.
- Measures to be taken to ensure that by 2020
 - (a) at least 50% by weight of waste from households is prepared for reuse or recycled.
 - (b) at least 70% by weight of construction and demolition waste⁷ is subjected to material recovery.’

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**.

Figure A1: 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.

WASTE POLICY & GUIDANCE FOR LONDON

The Mayor's vision for London's waste (2010)⁸

In 2010 the Mayor unveiled London's first dedicated draft document aimed at tackling the 16 million tonnes of waste from sources such as the commercial & industrial (C&I) and construction, excavation & demolition (CE&D) sectors.

The strategy, which is non-statutory, particularly focuses on waste reduction and highlights the economic benefits of businesses improving their waste management practices.

When the document was published, London recycled 57% of its waste; the Mayor specified a target of 80% of all London's waste to be recycled or composted by 2031, setting the following recycling targets for London:

- To reuse and recycle 95% of CE&D waste by 2020, maintaining this performance to 2031.

In November 2011, Making Business Sense of Waste was published.

Making Business Sense of Waste: The Mayor's Business Waste Strategy for London⁹

Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.

The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)¹⁰

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 net self-sufficiency

⁸ Greater London Authority (GLA) (2010) *The Mayor's vision for London's waste*
<http://legacy.london.gov.uk/mayor/environment/waste/docs/vision-jan2010.pdf>

⁹ GLA (2011) *Making Business Sense of Waste: The Mayor's Business Waste Strategy for London*
<http://www.london.gov.uk/publication/londons-wasted-resource-mayors-municipal-waste-management-strategy>

¹⁰ GLA (2016) *The London Plan The Spatial Development Strategy for London Consolidated with Alterations Since 2011*
https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf

A *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;*
- *Create positive environmental and economic impacts from waste processing, and*
- *Work towards zero biodegradable or recyclable waste to landfill by 2031.*

B *This will be achieved by:*

- *Minimising waste;*
- *Encouraging the reuse of and reduction in the use of materials;*
- *Exceeding recycling/composting levels in local authority collection waste (LACW) of 45 per cent by 2015, 50 per cent by 2020 and aspiring to achieve 60 per cent by 2030;*
- *Exceeding recycling/composting levels in commercial and industrial waste of 70% by 2020;*
- *Exceeding recycling and reuse levels in construction, excavation and demolition (CE&D) waste of 95 per cent 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.’*

Draft New London Plan Showing Minor Suggested Changes (2018)¹¹

The Draft New London Plan showing Minor Suggested Changes, which includes clarifications, corrections and factual updates to the Consultation Draft Plan that will help inform the Examination in Public, was published on 13 August 2018.

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

‘Policy D1 London’s form and characteristics

3.1.8 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.’

¹¹ GLA (2018) *Draft New London Plan Showing Minor Suggested Changes*

https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf



'Policy D4 Housing quality and standards

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.'

'Policy S17 Reducing waste and supporting the circular economy

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:

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

London's Wasted Resource: The Mayor's Municipal Waste Management Strategy (2011)¹²

The Municipal Waste Management Strategy is part of a series of strategies that together set out actions and policies to make London the best big city in the world, by improving the quality of life of Londoners and making the city more sustainable.

By reducing the amount of waste produced and reusing waste that cannot be prevented presents the greatest economic and environmental benefits for London. It is not feasible to continue managing waste by investing in expensive waste collection and treatment infrastructure without implementing an active strategy of reduction and reuse. The Mayor therefore sets out in the Municipal Waste Management Strategy what actions London's households and businesses can take to reduce waste and also calls on the government and industry to play a role.

Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011)¹³

Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.

¹² GLA (2011) *London's Wasted Resource – The Mayor's Municipal Waste Management Strategy*

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

¹³ GLA (2011) *Making Business Sense of Waste: The Mayor's Business Waste Strategy for London*

<http://www.london.gov.uk/publication/londons-wasted-resource-mayors-municipal-waste-management-strategy>

LOCAL WASTE POLICY

RBKC: Consolidated Local Plan (July 2015)¹⁴

The existing Local Plan sets out the vision, objectives and detailed spatial strategy for future development in the Royal Borough up to 2028 along with specific strategic policies and targets, development management policies and site allocations.

At the time of preparing this report, RBKC was undertaking a Partial Review of the existing Local Plan. The third stage in this Partial Review is a 'Publication Policies' consultation which RBKC is consulting on from 2 February until 16 March 2017 (six weeks).

The Consolidated Local Plan (July 2015) combines alterations since the Core Strategy adoption (December 2010) incorporating the Pubs & Local Character Review (October 2013), the Miscellaneous Matters Review (December 2014), the Conservation & Design Review (December 2014) and the Basements Review (January 2015).

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

'Policy CE 3: Waste

The council will meet the waste apportionment figure as set out in the London Plan and will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse and recycle waste as close as possible to where it is produced.

To deliver this the council will:

c. require provision of adequate refuse and recycling storage space which allows for ease of collection in all developments;'

RBKC: Transport and Streets SPD (April 2016)¹⁵

RBKC adopted the Transport and Streets SPD on 20 April 2016 which provides more detailed guidance and advice on the adopted Local Plan Policies CT1 (Improving Alternatives to Car Use), CR1 (Street Network), CR3 (Street and Outdoor Life), CR4 (Streetscape) and CR7 (Servicing).

RBKC: Local Plan Partial Review¹⁶

RBKC is undertaking a Partial Review of the existing Local Plan in accordance with the timetable set out in the Council's Local Development Scheme (LDS):

¹⁴ RBKC (2015) *Consolidated Local Plan (July 2015)*

<https://planningconsult.rbkc.gov.uk/gf2.ti/f/277378/16678437.1/PDF/-/CLP2015.pdf>

¹⁵ RBKC (2016) *Transport and Streets SPD*

<https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/supplementary-planning/transport-and-streets-spd-april>

¹⁶ RBKC (2018) *Local Plan Partial Review*



- Issues and Options consultation: (Pre-Regulation 18) Tuesday 15 December 2015 to Tuesday 9 February 2016;
- Draft Policies consultation (Regulation 18) Friday 28 October to Sunday 11 December 2016.
- Publication Policies consultation (Regulation 19) Thursday 2 February to Thursday 19 March 2017
- Submission and examination (Regulations 22-25) May to October 2017. Examination hearings will commence on 27 February 2018.
- Adoption (Regulation 26) Expected Late Summer/ Autumn 2018

<https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan>



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