

Shurgard UK Ltd

45-47 Garman Road, Tottenham

OPERATIONAL WASTE MANAGEMENT PLAN

**REPORT REF.
2203251-03**

March 2024

HEAD OFFICE: 3rd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3M 5JE **T** | 020 7680 4088

EDINBURGH: Suite 35 4-5 Lochside Way Edinburgh EH12 9DT **T** | 0131 516 8111

ESSEX: 1 - 2 Crescent Court, Billericay, Essex, CM12 9AQ **T** | 01277 657 677

KENT: Suite 10, Building 40, Churchill Business Centre, Kings Hill, Kent, ME19 4YU **T** | 01732 752 155

MIDLANDS: Office 3, The Garage Studios, 41-43 St Mary's Gate, Nottingham, NG1 1PU **T** | 0115 697 0940

SOUTH WEST: Temple Studios, Bristol, England, BS1 6QA **T** | 0117 456 4994

SUFFOLK: Suffolk Enterprise Centre, 44 Felaw Street, Ipswich, IP2 8SJ **T** | 01473 407 321

Contents	Page
1. Introduction	1
2. Legislation/Planning Policy	2
3. The Proposed Development	5
4. Methodology	6
5. Management Plan	7
6. Waste and Recycling Storage and Collection Provision.....	12
7. Summary.....	16
8. References.....	17

Document Control Sheet

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	Draft	NA/SG	KL/BS	Draft Only	08/02/2024
-	Final	NA/SG	BS <i>BS</i>	DH <i>DA</i>	01/03/2024

Distribution

This report has been prepared for the exclusive use of Shurgard UK Ltd. It should not be re-produced in whole or in part, or relied upon by third parties, without the express written au-thority of Ardent Consulting Engineers

1. Introduction

- 1.1 This Operational Waste Management Plan (hereafter referred to as the 'Plan') has been prepared by Ardent on behalf of Shurgard UK Ltd (hereafter referred to as the 'Client') for the Shurgard Self Storage development at 45-47 Garman Road, Tottenham (hereafter referred to as the 'Proposed Development') located within the administrative boundary of London Borough of Haringey (LBH).
- 1.2 This Plan provides a review of the requirements placed upon the Proposed Development under legislation and implemented policy at all levels of government (i.e., national (England), district (Greater London Authority (GLA)), regional (North London Waste Authority (NLWA)) and local (LBH). Consideration has also been given to the requirements included in local standards, local planning policy and guidance documents to comply with relevant objectives and targets.
- 1.3 The methodology used to identify and estimate volumes of waste generated during operation of the Proposed Development is provided in the Section 4 (Methodology). Following this, the approach taken towards waste management within the Proposed Development is discussed. This includes a breakdown of the waste management process, including waste handling, storage area provision, and collection arrangements. All waste reduction measures are compliant with British Standards 5906:2005 (Ref. 1), the Waste (England and Wales) Regulations, 2011 (as amended) (Ref. 2) and Part H6 of the Building Regulations (2010) (incorporating all amendments) (Ref. 3) Document (hereafter referred to as 'Part H6').
- 1.4 This Plan has been written by Ardent, using information provided by the Client.

2. Legislation/Planning Policy

2.1 A summary list of the legislation relevant to the management of operational waste is provided in this section.

National Waste Legislation

- The Animal By-Products (England) Regulations 2009 (as amended) (Ref. 4),
- Clean Neighbourhoods and Environment Act 2005 (as amended) (Ref. 5),
- Control of Pollution Act (COPA) 1974 (as amended) (Ref. 6),
- The Controlled Waste (England and Wales) Regulations 2012 (as amended) (Ref. 7),
- The Environment Act 1995 (Ref. 8),
- Environmental Protection Act 1990 (EPA) (Ref. 9),
- The Landfill Tax Regulations 1996 (as amended) (Ref. 10),
- The List of Wastes (England) Regulations (as amended) (Ref. 11),
- The Pollution Prevention and Control (Fees) (Miscellaneous Amendments) Regulations 2017 (Ref. 12),
- The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended) (Ref. 13),
- The Hazardous Waste Regulations 2005 (as amended) (Ref. 14),
- The Waste (England and Wales) Regulations, 2011 (as amended),
- The Waste Batteries and Accumulators Regulations 2009 (as amended) (Ref. 15), and
- The Waste Electrical and Electronic Equipment (WEEE) Regulations 2015 (Ref. 16).

Waste and Planning Policy

2.2 The national, regional, and local waste and recycling management planning policies in **Table 2.1** contain information applicable to the Proposed Development.

Table 2.1 Waste and Recycling Management Policies

Waste/Planning Policy Document	Date	Policy	Detail
A Green Future: Our 25 Year Plan to Improve the Environment (Ref. 17)	2018	Chapter 4: Increasing resource efficiency and reducing pollution and waste	- Make sure that resources are used more efficiently and kept in use for longer to minimise waste and reduce its environmental impacts by promoting reuse, remanufacturing, and recycling. - Work towards eliminating all avoidable waste by 2050 and all avoidable plastic waste by end of 2025.
Our Waste, Our Resources: A Strategy for England (Ref. 18)	2018	1.1.1	Extended Producer Responsibility - The Extended Producer Responsibility (EPR) is “a policy approach through which a producer’s responsibility for a product is extended to the post-use stage. This incentivises producers to design their products to make it easier for them to be reused, dismantled and/or recycled at end of life”, this also applies to certain materials within the construction and demolition section.
		1.1.4	Deposit Return Scheme - In a Deposit Return Scheme (DRS), a small deposit will be added to the price of a drink container brought to a store. Once the container has been used, the consumer will dispose of it in a reverse vending machine and the deposit will be returned to the consumer.
		1.3.2	Consistent Collections - Subject to consultation, legislation enforcing the government to “specify a core set of materials to be collected by all local authorities and waste operators” will be introduced. It is envisioned that specifying a consistent set of dry recyclable materials to be collected from all households and businesses will improve England’s recycling rate, (subject to consultation) it will include mandatory separate food waste collections.
Regional			
The London Plan (Ref. 19)	2021	The London Plan Policy SI 7 Reducing Waste and Supporting the Circular Economy	- This policy states that waste reduction and reduction in the quantity of waste going for disposal from London can be achieved by promoting circular economy i.e. - By encouraging the reuse of material and by using fewer resources in the production and distribution of products, - By ensuring that zero biodegradable or recyclable waste is sent to landfill by 2026, - By meeting the set recycling targets (i.e. 65% for municipal waste by 2030), - By designing developments that would provide adequate, flexible, and easily accessible storage space to support collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
		The London Plan Policy T7 Deliveries, Servicing and Construction	- This policy states that development proposals must consider the use of rail/water for the transportation of material with increased levels of direct vision on waste. - Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road. - At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.
The London Environment Strategy (Ref. 20)	2018	Policy 7.2.2	Targets a 65% recycling rate for municipal waste (this is broken down into a 50% recycling target for household waste and a 75% target for business waste by 2030) and specifies that no biodegradable or recyclable waste will be sent to landfill by 2026.
Local			
North London Joint Waste Strategy (Ref. 21)	2009	Objectives	- To minimise the amount of municipal wastes arising, - To maximise recycling and composting rates, - To reduce greenhouse gases by disposing of less organic waste in landfill sites,

			- To co-ordinate and continuously improve municipal wastes minimisation and management policies in North London, - To manage municipal wastes in the most environmentally benign and economically efficient ways possible through the provision and co-ordination of appropriate wastes management facilities and services, - To ensure that services and information are fully accessible to all members of the Community, - To maximise all opportunities for local regeneration, - To ensure an equitable distribution of costs, so that those who produce or manage the waste pay for it.
North London Waste Plan Proposed Submission (Ref. 22)	2019	S01	States “to support the movement of North London’s waste as far up the waste hierarchy as practicable, to ensure environmental and economic benefits are maximised by utilising waste as a resource”.
		S02	States “to support the use of sustainable forms of transport and minimise the impacts of waste movements including on climate change”.
London Borough of Haringey Development Management DPD (Ref. 23)	2017	Policy DM4: Provision and design of waste management facilities	- This Policy States that all proposals must consider how to sustainably manage waste arising from the development during the design, construction, and occupation phases of new developments. - All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic matter for composting.
London Borough of Haringey, Sustainable Design and Construction Supplementary Planning Document (Ref. 24)	2013	Planning Document and Appendices	- Waste minimisation and sustainable waste management should be promoted through encouraging reduction, reuse, recycling materials and treating the remaining waste as a resource. - Planning for a development should give consideration to storage and collection of household and commercial waste based on weekly collections (for high-rise residential properties). - Low impact and responsible building materials should be used during construction, this includes re-use and recycled materials.
London Borough of Haringey Unitary Development Plan Saved Policies (Post Local Plan Adoption) (Ref. 25)	2013	Policy UD7 – Waste Storage	- New developments must provide enough space to store waste until it can be collected - Adequate recycling storage must also be provided to help meet the Government’s recycling targets

3. The Consented Development

- 3.1 Once complete, the Development will comprise of a single block levelling up to 3 floors providing 6,254 m² of Gross Internal Area (GIA) of storage space and other uses. Table 3.1 provides information on the floor level breakdown.
- 3.2 The Development will provide storage space for the waste and recycling material arising from all the FOH areas that total up to 43 m² Gross Internal Area (GIA).

Table 3.1 Floor Level Breakdown

Floor	GEA (M²)	GIA (m2)
Ground Floor	1,109	1,082
First Floor	1,751	1,724
Second Floor	1,751	1,724
Third Floor	1,751	1,724
Total	6,362	6,254

4. Methodology

- 4.1 LBH does not currently provide guidance or requirements for the commercial waste arisings within developments therefore, commercial waste and recycling material arisings from the Proposed Development have been calculated based on the methodology set out in BS 5906:2005, which is set out in Table 4.1.

Table 4.1 Methodology for Commercial Waste and Recycling Materials

Floor	Methodology	Storage Requirements	Stream Ratios
Front of House Areas	BS 5906:2005	5 L per m ² of Gross Internal Area (GIA) / Floor Area	MDR : Residual 75:25

5. Management Plan

Waste and Recycling Arisings

5.1 Based on the methodology provided in Table 4.1, the estimated weekly waste and recycling material arising from the FOH areas of the Proposed Development is provided in Table .

Table 5.1 Weekly Commercial Waste and Recycling Arisings

Land Use	GIA (M ²)	MDR (li-tre/week)	Residual (Li-tre/week)	Total (Li-tre/week)
Front of House Areas	43	161	54	215

Storage Containers

5.2 Table 2 provides the example dimensions of storage containers ('bins') that are proposed to be used. Please note that bin dimensions may vary between different manufactures, therefore, these dimensions provided should be used as reference only.

Table 2.2 Standard Bin Dimensions

Bin	Dimensions
	Capacity (L): 240
	Height (mm): 1,100*
	Length (mm): 880*
	Width (mm): 665*
*Bin dimensions might vary between manufacturers	

Waste and Recycling Storage Requirements

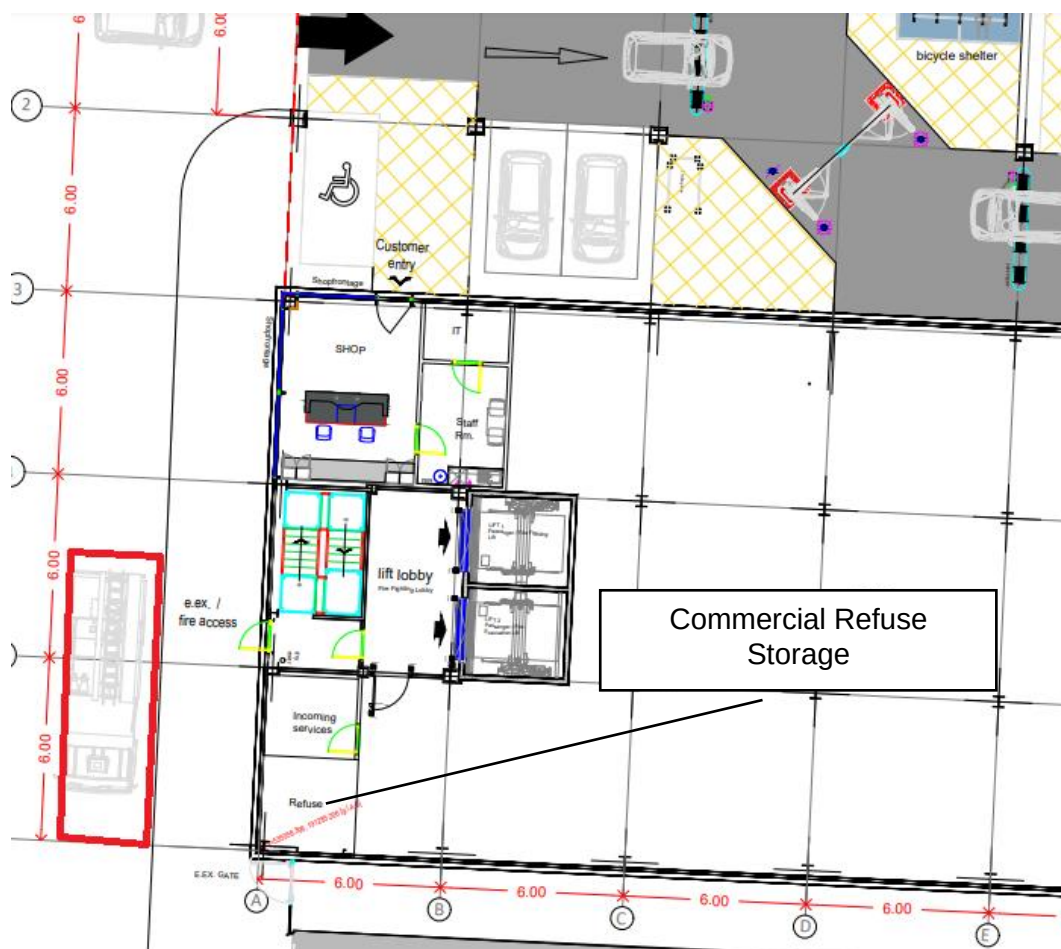
5.3 Based on the weekly commercial waste and recycling arisings as provided in Table , the subsequent storage requirements are provided in Table .

Table 5.3 Commercial Waste and Recycling Storage Requirements based on Weekly Collection

Block	MDR	Residual
Overall	1 × 240L	1 × 240L

- 5.4 Sufficient space has been provided on the ground floor level of the Proposed Development for a commercial bin store (as shown in Figure 5.1). This bin store is located within 30 m distance of the FOH area. At the end of the working day, the building management team will transfer the waste from the FOH areas to the bin store, where the waste will be segregated and deposited into the correct bins.
- 5.5 It should be noted that this bin store will not serve the customers of the individual storage units, as will be responsible for managing and disposing the waste generated from their storage units. In case of non-compliance, then they will be fined. The money received from the fine, will be used to dispose their waste.

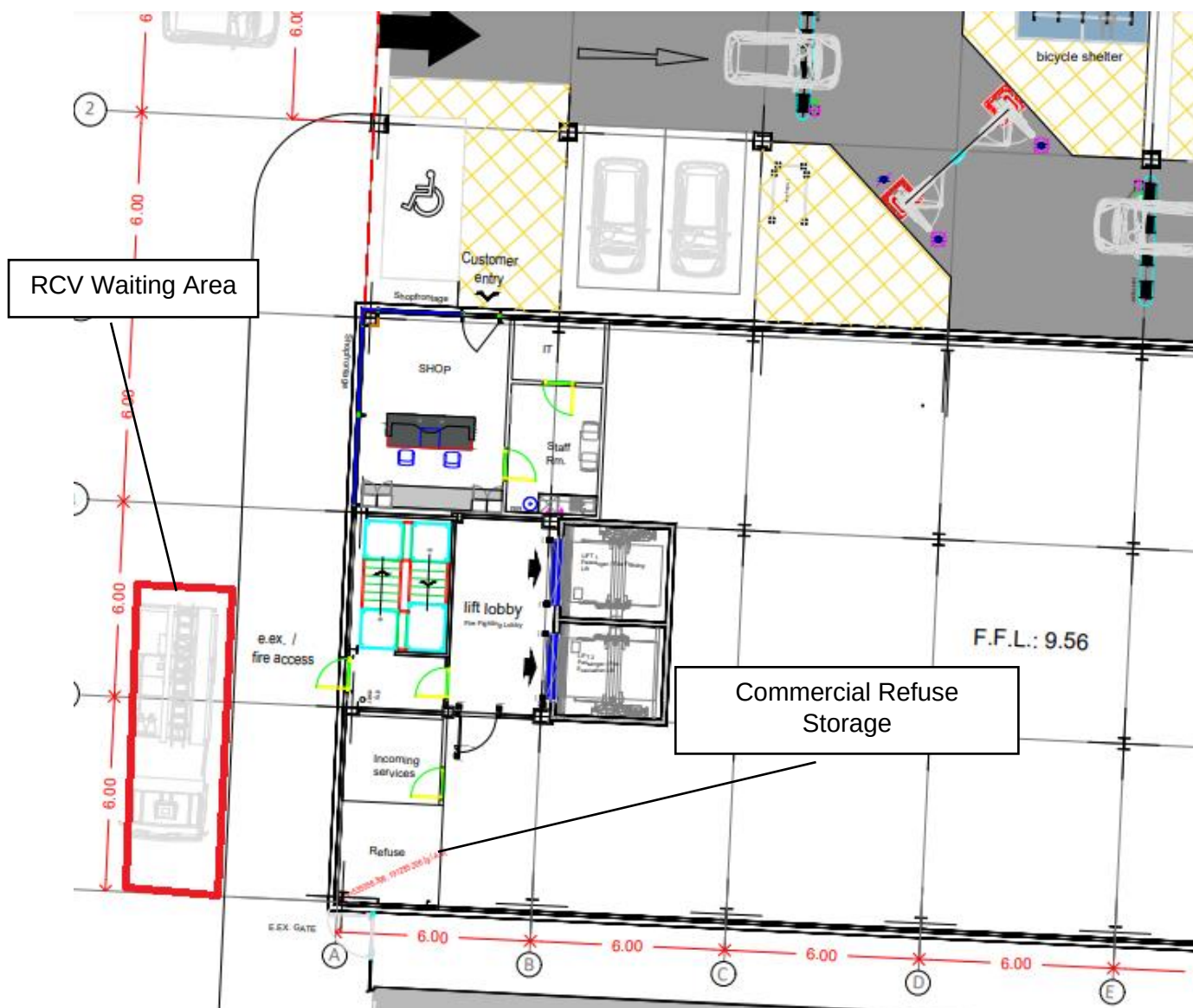
Figure 5.1 Commercial Bin Store



Please note that this Figure is not drawn to scale

- 5.6 The bin store will provide bins for all waste and recycling streams including MDR and Residual waste. In addition, space has also been provided to place a Food waste bin as well (if required).
- 5.7 At this stage, it is assumed that this waste and recycling material will be collected by a private waste collection contractor on a weekly basis. On the day of collection, the refuse collection operatives will enter the bin store and transport the bins (to be collected on that day) to the RCV for emptying purpose. Once emptied, the collection operatives will return the empty bins back to the bin store. The estate management team will also be available if any help is required.
- 5.8 Figure 5.2 provides the parking location for the RCV.

Figure 5.2 RCV Parking Location



Please note that this Figure is not drawn to scale.

Unique Waste

- 5.9 There is likely to be a small component of the overall waste arisings from the Proposed Development that will comprise other waste streams, such as waste electrical and electronic equipment (WEEE), printer and toner cartridges and fluorescent light tubes. Building maintenance will also give rise to materials such as paints and waste lubricating oils that will require separate storage in dedicated sealed containers.

5.10 This type of waste is termed “unique” as it will not be produced on a regular basis and therefore its management will be on special arrangement with a registered waste handler for the specific waste that is produced. Hazardous waste is required to be kept separate from general and bulky waste. There is space for this within the bin store for these types of waste. Separate arrangements will be made by the building management team for the safe disposal of these waste streams, as covered by the Hazardous Waste (Amendment) Regulations 2016 and WEEE Regulations 2015. All waste management will have to comply with Environmental Protection Act 1990 and The Waste (England and Wales) (Amendment) Regulations 2014.

6. Waste and Recycling Storage and Collection Provision

- 6.1 In accordance with BS EN 840, as set out in BS 5906:2005, all waste containers within the Proposed Development will be stored under cover in specially designed waste storage room, which will be built to the same general standard for commercial premises. The walls and roofs of this store will be formed of non-combustible, robust, secure and impervious material, and have a fire resistance of one hour when tested in accordance with BS 476-21 - Fire tests on building materials and structures: Part 21 (Ref. 26), whilst the door of the store will be made of steel, and will have a fire resistance of 30 minutes when tested in accordance with BS 476-22 - Fire tests on building materials and structure: Part 22 (Ref. 27).
- 6.2 Further to these requirements, the Proposed Development will also comply with the guidance set out in BS 5906:2005 and Part H6 as provided below:

Location

- Bin stores will be away from the main entrance to the building.
- Waste and recycling material containers will be sited so that the containers can be taken for collection without being taken through a building unless it is a porch, garage, bike store, car port or other open space.

Convenience

- All waste (student accommodation and commercial) will be collected by commercial waste contractors for the life of the development.

Screening or covering

- All waste holdings will be high enough for lids to open and close where lidded containers are installed.
- Bins will be fitted with close fitting lids to prevent vermin access.
- Internal built storage areas will conform to BS 5906:2005.

Signage

- Waste and recycling material storage areas will be marked, and signs should be provided.
- Estate Management Team and the employees will be made aware of the fire risk from waste and recycling material storage. This will be done using signage and displaying the danger when waste and recycling material materials are stored carelessly.

- All roads will be clearly marked and controlled to prevent unauthorised parking.

Accessibility

- Waste and recycling material storage areas will be located in a position that provides easy and safe access for both waste and recycling material producers and collectors. Ease of use for older persons, persons short of stature and people with disabilities.

Access paths and roads

- All doors and pathways will be 200 mm wider than any bins that are required to pass through or over them.
- Routes from bin storage areas to collection points will be as straight as possible with no kerbs or steps. Gradients will be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible.
- There will not be steps and projections at the entrance of a bin store.

Vehicle Access

- Adequate waste and recycling material storage arrangements will be made so that waste and recycling material does not need to be placed on the public highway.
- Vehicles will not need to reverse.
- Loading areas will have headroom appropriate to the method of waste collection.

Materials and finishing

- The walls and roofs of the bin store will be formed of non-combustible robust and secure materials with a smooth finish suitable of washing down. The door of the bin store will be made of steel.
- The floor of the bin store will be no less than 100 mm thick.

Safety and anti-social behaviour

- Location will be taken regarding minimise environmental impacts and nuisance from anti-social behaviour.
- The door will be capable of being opened from the inside as well as the outside for reasons of safety.
- Unsightly bins can damage the visual amenity and contribute to increased level of anti-social nuisance such as odour and litter. Therefore, bins will be planned carefully and should not be stored in a publicly accessible area.

Fire safety

- Stored waste and recycling material will be identified as a potential hazard in any fire risk assessment.
- Fire safety guidance states that all wheeled bins will be 6 meters or further from a building, unless the bins are in a purpose-built brick bin store which has a roof and fire doors. See BS 9999:2008 Code of practice for fire safety in the design, management and use of buildings including DDA compliance (Ref. 28).
- Tenants will be made aware of the fire risk using signage and of the dangers when waste and recycling material materials are stored carelessly.
- Internal bin stores will be constructed within a fire compartment structure which is designed to contain a fire.
- Any internal storage areas adjacent to a fire escape route will be fitted with fire doors, automatic fire detection and a sprinkler system and comply with the Regulatory Reform (Fire Safety) Order 2005 (Ref. 29).
- In multi-storey buildings where fire is a greater risk, suitably sized manual fire extinguishers will be deployed. For larger risks, a dedicated automatic fire sprinkler or water mist system will be considered.
- The walls and roofs of the bin store will have a fire resistance of one hour when tested in accordance with BS 476-21. The door of the bin store will be made of steel or have a fire resistance of 30 minutes when tested in accordance with BS 476-22.

Ventilation and Lighting

- Bin stores will be lit to be safe for residents and collection operatives to use and service during darkness hours.
- Permanent ventilators will be provided giving a total ventilation area of not less than 0.2 m². Passive ventilators will be fly and vermin proof and located near to the ceiling and floor of the bin store as possible but away from windows and dwellings.
- Electrical lighting will consist of sealed bulkhead fittings with houses related to IP65 in BS EN 60529:1992 (Ref. 30) for the purpose of cleaning down with hoses and inevitable splashing.
- Luminaires will be low energy light fittings or low energy lamp bulbs, controlled by a proximity detection or time delay button to prevent lights being left on.

Maintenance

- Arrangements will be made for the cleaning of the bin store with water. A hose union tap should be provided in agreement with the local water authority and the Environment Agency.
- The floor of the bin store will have a suitable fall towards the drainage point. Gullies will be positioned not to be in the track of container wheels and should incorporate a trap which maintains a seal, even during prolonged periods of disuse

7. Summary

- 7.1 In keeping with national, regional (London) and local (NLWA and LBH) policy, this Plan demonstrates how the Proposed Development will continue to promote sustainable waste and recycling management methods.
- 7.2 In following the Waste Hierarchy, the Proposed Development will promote resource efficiency to help reduce potential environmental impacts as a result. This Plan has firstly looked to prevent waste, reuse resources where possible and recycle materials, minimising the generation of waste.
- 7.3 The Proposed Development includes sufficient space to enable best practice recycling methods and flexibility in the future. This Plan shows how the Proposed Development has segregated and provided space for Recycling and Residual streams.
- 7.4 Alongside striving towards local policy objectives, this Plan can help achieve wider district goals such as reaching recycling targets (65% of municipal waste) alongside providing adequate, flexible, and easily accessible bin store to support recyclables and food waste as set by the London Plan – 2021.

8. References

- Ref. 1 British Standards Institute (BSI), (2005); BS 5906:2005, Waste Management in Buildings – Code of Practice
- Ref. 2 Her Majesty Statutory Office (HMSO), (2011); The Waste (England and Wales) Regulations (as amended)
- Ref. 3 Department for Communities and Local Governments (DCLG), (2013); Building Regulations – Approved Document H: Drainage and Waste Disposal (Incorporating 2010, 2013, and 2015 amendments)
- Ref. 4 HMSO, (2011); The Animal By-Products (Enforcement) Regulations 2011.
- Ref. 5 HMSO, (2015); Clean Neighbourhoods and Environment Act 2015.
- Ref. 6 HMSO, (1989); Control of Pollution Act 1989.
- Ref. 7 HMSO, (2012); The Controlled Waste (England and Wales) Regulations 2012.
- Ref. 8 HMSO, (1995); Environment Act 1995.
- Ref. 9 HMSO, (1990); Environmental Protection Act 1990.
- Ref. 10 HMSO, (1996); The Landfill Tax Regulations 1996.
- Ref. 11 HMSO, (2005); The List of Wastes (England) Regulations 2005.
- Ref. 12 HMSO, (2017); The Pollution Prevention and Control (Fees) (Miscellaneous Amendments) Regulations.
- Ref. 13 HMSO, (2007); The Producer Responsibility Obligations (Packaging Waste) Regulations 2007.
- Ref. 14 HMSO, (2005); The Hazardous Waste Regulations 2005 (as amended)
- Ref. 15 HMSO, (2009); The Waste Batteries and Accumulators Regulations 2009.
- Ref. 16 HMSO, (2013); The Waste Electrical and Electronic Equipment (WEEE) (as amended)
- Ref. 17 HMSO, (2018); A Green Future: Our 25 Year Plan to Improve the Environment.
- Ref. 18 HMSO, (2018); Our Waste, Our Resources: A Strategy for England.
- Ref. 19 GLA (2021); London Plan, Spatial Development Strategy for Greater London.
- Ref. 20 GLA (2018); London Environment Strategy.
- Ref. 21 NLWA, (2009); Joint Waste Strategy.
- Ref. 22 North London Waste Authority (NLWA), (2019); North London Waste Plan Proposed Submission (Regulation 19).
- Ref. 23 London Borough of Haringey (LBH), (2017); LBH Development Management DPD
- Ref. 24 LBH, (2013); LBH Sustainable Design and Construction Supplementary Planning Document
- Ref. 25 LBH, (2013); LBH Unitary Development Plan Saved Policies (Post Local Plan Adoption)
- Ref. 26 BSI, (1987); BS 476-21, Fire tests on building materials and structures: Part 21.
- Ref. 27 BSI, (1987); BS 476-22, Fire tests on building materials and structures: Part 22.

- Ref. 28 BSI 9999:2008; Code of practices for fire safety in the design, management and use of buildings
- Ref. 29 BSI, (2005); Regulatory Reform (Fire Safety) Order, (2005).
- Ref. 30 BSI, (1992); BS EN 60529:1992, Specification for degrees of protection provided by enclosures (IP code).