North Street East

Usage: empty
2nd half: Empty

1st half furnishings; Bakelite roof pannels

2nd half furnishings: bakelite panels on tunnel walls and roof

Item	No.	Sum	Unit	Notes / Assumptions
General				
Floor space area (GIA)		436.8	m2	Total Floor area - approximate based on Matterport surevy. .
Tunnel bore height (including concrete floor)		4.1	m	Measurement from floor to roof of tunnel bore
Length of Tunnel		112.0	m	Length of tunnel
Diameter of Tunnel		5.0	m	Average width assumed constant throughout tunnel
Radius of tunnel		2.5	m	Width halved
Floor width		3.9	m	floor width within bottom 10th of tunnel bore
Total internal surface area of tunnel minus floor space area		1376.5	m2	2x πr2 Plus 2πr2xL
Concrete				
Total concrete floor (in situ quantities pre-processing)		**143.9**	***m3***	Approximate concrete within base of tunnel bore, not accounting for drainage and or service ducting - assumed removal of 50%
Total concrete (in situ quantities pre processing)		**143.9**	***m3***	Based on the above assumptions and calculations - Tonnes conversion factors based on referenced websites and standard guidance (Bulk density of 2300kg/m3)
Processed concrete volume (inc bulking factor)		**244.6**	***m3***	
Concrete tonnes conversation		**331.0**	***Tonnes***	
Floor Tiles (Assumed ceramic tile)				
Tiled floor space per floor		436.8	m2	The assumption that the floor space is ceramic tiling (14kg per m2)
Total Volume of floor Tiles	0.003	***1.3***	***m3***	Thickness assumption based on average thickness of commercial tiles (0.003m)
Tile tonnes	0.0026	***1.1***	***Tonnes***	weight conversion based on referenced websites (2.6kg per m2)
Water pipework				
Water pipework	0.015	***117.0***	***m***	Length of tunnel plus width in m. based on assumptions. 0.015m based on referenced websites.
Steel Pipework	0.96	***1.8***	***Tonnes***	1m steel pipe = 0.0015 tonnes (25mm dia pipe with 2.5mm thick walls)
Electrical				
LV Electrical cables		448.0	m	Assumed 4 lengths off tunnel for distribution
Volume in m3 for LV Electrical cables	0.04	17.9	m3	Assumption based on referenced websites
Volume in tonnes for LV electrical cables	0.015	**0.3**	**Tonnes**	
Fluorescent Lighting per floor		***15.0***	***No.***	Based on assumptions
Total volume Florescent Lighting		***0.0***	***Tonnes***	95g each flourescent tube aprox
Bakerlite pannels (Identified in asbestos management survey)				
Total Bakerlite panneling		344.1	m2	Assumptions from Matterport survey Bakerlite panel weight = 1250kg / m3 (25% coverage, just roof of tunnel)
Bakerlite panneling m3	0.002	0.7	m3	Bakerlite pannel thickness 2mm
Bakerlite panneling tonnes	1.25	***0.9***	***Tonnes***	
Ventilation ducting				

Ductwork for Air handling units		***1.7***	***Tonnes***	Approximately 1 lengths of the tunnel (15kg/m)

South Street East

Usage: empty

2nd half: Empty

1st half furnishings; Bakelite pannels on walls and roof

2nd half furnishings: Bakelite panels on tunnel walls and roof

Item	No.	Sum	Unit	Notes / Assumptions
General				
Floor space area (GIA)		436.8	m2	Total Floor area - approximate based on Matterport surevy. .
Tunnel bore height (including concrete floor)		4.1	m	Measurement from floor to roof of tunnel bore
Length of Tunnel		112.0	m	Length of tunnel
Diameter of Tunnel		5.0	m	Average width assumed constant throughout tunnel
Radius of tunnel		2.5	m	Width halved
Floor width		3.9	m	floor width within bottom 10th of tunnel bore
Total internal surface area of tunnel minus floor space area		1376.5	m2	2x πr2 Plus 2πr2xL
Concrete				
Total volume concrete floor		**143.9**	***m3***	Approximate concrete within base of tunnel bore, not accounting for drainage and or service ducting - assumed removal of 50%
Total concrete (in situ quantities pre processing)		**143.9**	***m3***	Based on the above assumptions and calculations - Tonnes conversion factors based on referenced websites and standard guidance (Bulk density of 2300kg/m3)
Processed concrete volume (inc bulking factor)		**244.6**	***m3***	
Concrete tonnes conversation		**331.0**	***Tonnes***	
Floor Tiles (Assumed ceramic tile)				
Tiled floor space per floor		436.8	m2	The assumption that the floor space is ceramic tiling (14kg per m2)
Total Volume of floor Tiles	0.003	***1.3***	***m3***	Thickness assumption based on average thickness of commercial tiles (0.003m)
Tile tonnes	0.0026	***1.1***	***Tonnes***	weight conversion based on referenced websites (2.6kg per m2)
Water pipework				
Water pipework	0.015	***117.0***	***m***	Length of tunnel plus width in m. based on assumptions. 0.015m based on referenced websites.
Steel Pipework	0.96	***1.8***	***Tonnes***	1m steel pipe = 0.0015 tonnes (25mm dia pipe with 2.5mm thick walls)
Electrical				
LV Electrical cables		448.0	m	Assumed 4 lengths off tunnel for distribution
Volume in m3 for LV Electrical cables	0.04	17.9	m3	Assumption based on referenced websites
Volume in tonnes for LV electrical cables	0.015	**0.3**	**Tonnes**	
Fluorescent Lighting per floor		***15.0***	***No.***	Based on assumptions
Total volume Florescent Lighting		***0.0***	***Tonnes***	95g each flourescent tube aprox
Bakerlite pannels (Identified in asbestos management survey)				
Total Bakerlite panneling		1376.5	m2	Assumptions from Matterport survey Bakerlite panel weight = 1250kg / m3 (Wall and roof coverage)
Bakerlite panneling m3	0.002	7.2	m3	Bakerlite pannel thickness 2mm
Bakerlite panneling tonnes	1.25	***8.9***	***Tonnes***	
Doors				
Doors	16	4.0	No.	Assumption from matterport survey

Weight of doors tonnes	0.04	***0.2***	***Tonnes***	Weight based on referenced website average 40kg per door - 1m3 = 1000kg
Ventilation ducting				
Ductwork for Air handling units		***1.7***	***Tonnes***	Approximately 1 lengths of the tunnel (15kg/m)

Forth Avenue

Usage: empty
2nd half: Empty

1st half furnishings; Bakelite pannels on walls and roof Ceramic floor tiles

2nd half furnishings: Bakelite panels on tunnel walls and roof Ceramic floor tiles

Item	No.	Sum	Unit	Notes / Assumptions
General				
Floor space area (GIA)		560	m2	Total Floor area - approximate based on Matterport surevy. .
Tunnel bore height (including concrete floor)		5.73	m	Measurement from floor to roof of tunnel bore
Length of Tunnel		80	m	Length of tunnel
Diameter of Tunnel		7.2	m	Average width assumed constant throughout tunnel
Radius of tunnel		3.6	m	Width halved
Floor width		7	m	floor width within bottom 10th of tunnel bore
Total internal surface area of tunnel minus floor space area		1330.98745	m2	2x πr2 Plus 2πr2xL
Concrete				
Total volume concrete floor		**238.816645**	***m3***	Approximate concrete within base of tunnel bore, not accounting for drainage and or service ducting - assumed removal of 50%
Total concrete (in situ quantities pre processing)		**238.816645**	***m3***	Based on the above assumptions and calculations - Tonnes conversion factors based on referenced websites and standard guidance (Bulk density of 2300kg/m3)
Processed concrete volume (inc bulking factor)		**405.9882965**	***m3***	
Concrete tonnes conversation		**549.2782835**	***Tonnes***	
Floor Tiles (Assumed ceramic tile)				
Tiled floor space per floor		560	m2	The assumption that the floor space is ceramic tiling (14kg per m2)
Total Volume of floor Tiles	0.003	***1.68***	***m3***	Thickness assumption based on average thickness of commercial tiles (0.003m)
Tile tonnes	0.0026	***1.456***	***Tonnes***	weight conversion based on referenced websites (2.6kg per m2)
Water pipework				
Water pipework	0.015	***87.2***	***m***	Length of tunnel plus width in m. based on assumptions. 0.015m based on referenced websites.
Steel Pipework	0.96	***1.308***	***Tonnes***	1m steel pipe = 0.0015 tonnes (25mm dia pipe with 2.5mm thick walls)
Electrical				
LV Electrical cables		320	m	Assumed 4 lengths off tunnel for distribution
Volume in m3 for LV Electrical cables	0.04	12.8	m3	Assumption based on referenced websites
Volume in tonnes for LV electrical cables	0.015	**0.192**	**Tonnes**	
Fluorescent Lighting per floor		***15***	***No.***	Based on assumptions
Total volume Florescent Lighting		***0.0143***	***Tonnes***	95g each flourescent tube aprox
Bakerlite pannels (Identified in asbestos management survey)				
Total Bakerlite panneling		1330.98745	m2	Assumptions from Matterport survey Bakerlite panel weight = 1250kg / m3 (Wall and roof coverage)
Bakerlite panneling m3	0.002	2.6619749	m3	Bakerlite pannel thickness 2mm
Bakerlite panneling tonnes	1.25	***3.33***	***Tonnes***	
Doors				

Doors	16	8	No.	Assumption from matterport survey
Weight of doors tonnes	0.04	***0.32***	***Tonnes***	Weight based on referenced website average 40kg per door - 1m3 = 1000kg
Ventilation ducting				
Ductwork for Air handling units		***1.20***	***Tonnes***	Approximately 1 lengths of the tunnel (15kg/m)

Third Avenue

Usage: empty
2nd half: Empty

1st half furnishings; Bakelite pannels on walls and roof Ceramic floor tiles

2nd half furnishings: Bakelite panels on tunnel walls and roof Ceramic floor tiles

Item	No.	Sum	Unit	Notes / Assumptions
General				
Floor space area (GIA)		560.0	m2	Total Floor area - approximate based on Matterport surevy. .
Tunnel bore height (including concrete floor)		5.7	m	Measurement from floor to roof of tunnel bore
Length of Tunnel		80.0	m	Length of tunnel
Diameter of Tunnel		7.2	m	Average width assumed constant throughout tunnel
Radius of tunnel		3.6	m	Width halved
Floor width		7.0	m	floor width within bottom 10th of tunnel bore
Total internal surface area of tunnel minus floor space area		1331.0	m2	2x πr2 Plus 2πr2xL
Concrete				
Total volume concrete floor		**238.8**	***m3***	Approximate concrete within base of tunnel bore, not accounting for drainage and or service ducting - assumed removal of 50%
Total concrete (in situ quantities pre processing)		**238.8**	***m3***	Based on the above assumptions and calculations - Tonnes conversion factors based on referenced websites and standard guidance (Bulk density of 2300kg/m3)
Processed concrete volume (inc bulking factor)		**406.0**	***m3***	
Concrete tonnes conversation		**549.3**	***Tonnes***	
Floor Tiles (Assumed ceramic tile)				
Tiled floor space per floor		560.0	m2	The assumption that the floor space is ceramic tiling (14kg per m2)
Total Volume of floor Tiles	0.003	***1.7***	***m3***	Thickness assumption based on average thickness of commercial tiles (0.003m)
Tile tonnes	0.0026	***1.5***	***Tonnes***	weight conversion based on referenced websites (2.6kg per m2)
Water pipework				
Water pipework	0.015	***87.2***	***m***	Length of tunnel plus width in m. based on assumptions. 0.015m based on referenced websites.
Steel Pipework	0.96	***1.3***	***Tonnes***	1m steel pipe = 0.0015 tonnes (25mm dia pipe with 2.5mm thick walls)
Electrical				
LV Electrical cables		320.0	m	Assumed 4 lengths off tunnel for distribution
Volume in m3 for LV Electrical cables	0.04	12.8	m3	Assumption based on referenced websites
Volume in tonnes for LV electrical cables	0.015	**0.2**	**Tonnes**	
Fluorescent Lighting per floor		***15.0***	***No.***	Based on assumptions
Total volume Florescent Lighting		***0.0***	***Tonnes***	95g each flourescent tube aprox
Bakerlite pannels (Identified in asbestos management survey)				
Total Bakerlite panneling		1331.0	m2	Assumptions from Matterport survey Bakerlite panel weight = 1250kg / m3 (Wall and roof coverage)
Bakerlite panneling m3	0.002	2.7	m3	Bakerlite pannel thickness 2mm
Bakerlite panneling tonnes	1.25	***3.3***	***Tonnes***	
Ventilation ducting				
Ductwork for Air handling units		***1.2***	***Tonnes***	Approximately 1 lengths of the tunnel (15kg/m)

Appendix C

WASTE MANAGEMENT STRATEGY

Public

The London Tunnels PLC

THE LONDON TUNNELS

34. Waste Management Plan

TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 70106185

OUR REF. NO. TLT-WSP-XX-XX-RP-WM-000001 REV P02

DATE: NOVEMBER 2023

WSP

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APPENDICES

1. INTRODUCTION

1.1. PROJECT BACKGROUND

1.1.1. WSP has been commissioned by The London Tunnels PLC ('the Applicant') to prepare a Waste Management Strategy to consider waste arisings resulting from the Proposed Development which is located within the boundaries of both the City of London (CoL) and London Borough of Camden (LBC).

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

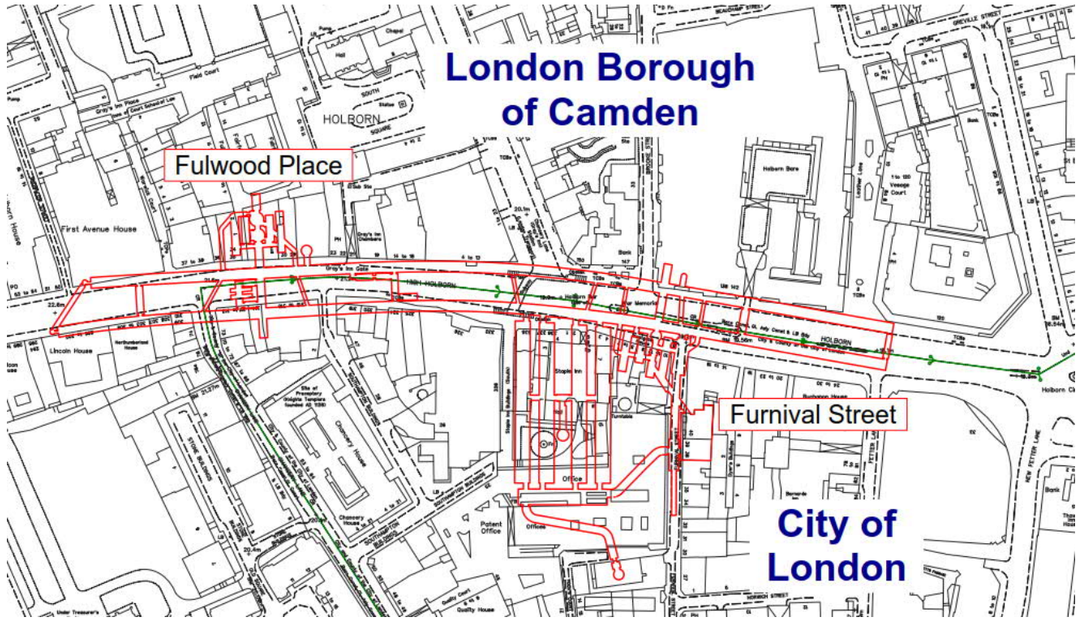
1.2. THE SITE

1.2.1. The sites forming the Proposed Development shall be referred to as the following in this report.

- 38-39 Furnival Street and 40-41 Furnival Street, EC4A 1JQ – *hereafter referred to as "Furnival Street".*
- 31-33 High Holborn, WC1V 6AX - *hereafter referred to as "Fulwood Place".*

1.2.2. As shown by Figure 1-1 below, the site lays across the border between COL and LBC.

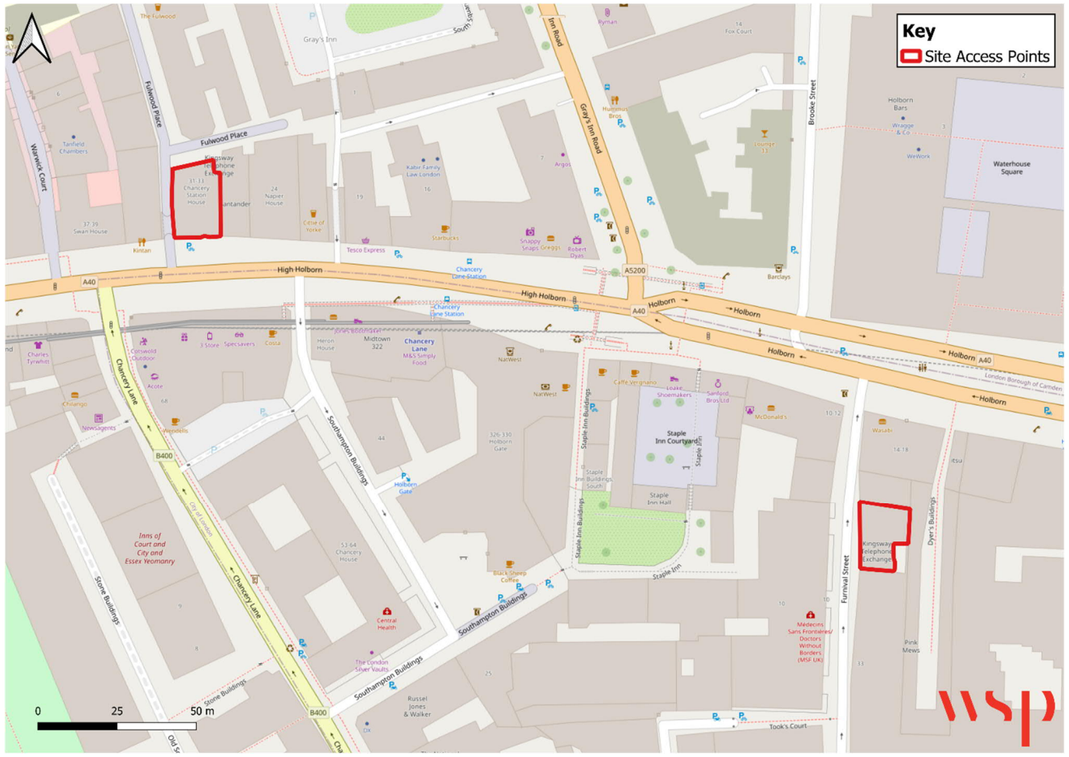
Figure 1-1 - Below Ground Site



Source: WilkinsonEyre drawing 01820-WEA-XX-ST-PD-A-0051

1.2.3. As shown, the Furnival Street access is located within the City of London and the Fulwood Place access is located within London Borough of Camden

Figure 1-2 - Site Access



1.3. PROPOSED DEVELOPMENT

1.3.1. The Proposed Development is described below:

> *Change of use of existing deep level Tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.*

1.4. REPORT STRUCTURE

1.4.1. This report is set out in the following format:

- **Section 1: Introduction**
- **Section 2: Waste Legislation, Policy & Guidance** – details of the national legislation and local waste policy and guidance that have relevance to the Proposed Development.
- **Section 3: Proposed Commercial Waste Strategy – Furnival Street** – provides an estimate of commercial waste arising and outlines the plan which will be adopted to manage the waste that will be collected via the Furnival Street entrance once operational.
- **Section 4: Proposed Commercial Waste Strategy – Fulwood Place** – provides an estimate of commercial waste arising and outlines the plan which will be adopted to manage the waste that will be collected via the Fulwood Place entrance once operational.
- **Section 5: Summary & Conclusions**
- **Appendix A: National, London and Local Waste Policy and Guidance**

2. WASTE LEGISLATION, POLICY & 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 and the subsequent transition period ended on 31 December 2020. During that time, the UK was treated for most purposes as if it were still an EU Member State, and most EU law (including as amended or supplemented) continued to apply to the UK. From 1 January 2021, 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.

2.1.4. This section 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 outlined below in reverse chronological order:

- **Environment Act 2021** – The Act contains several provisions in relation to waste which will affect both collection and disposal authorities. It establishes the Office for Environmental Protection, tighter regulations for shipments of hazardous wastes, introduces the deposit return scheme for drinks containers, charges for single use plastics, greater consistency for recycling collections in England and Extended Producer Responsibility for packaging.
- **Waste Management, The Duty of Care Code of Practice (2018 update)** – This code of practice replaces the 1996 and 2016 Codes 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)** – As of 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 by the Environmental Protection Act 1990.

2.3. NATIONAL AND LONDON 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), now the Department for Levelling Up, Housing and Communities, *National Planning Policy Framework* (updated September 2023);
- 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), *The London Plan (2021)* (March 2021);
- GLA, *London Environment Strategy* (2018); and
- GLA, *London Plan Guidance, Circular Economy Statements* (2022)

2.4. LOCAL WASTE POLICY (CITY OF LONDON)

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

- CoL, *Local Plan* (January 2015); and
- CoL, *Proposed Submission City Plan 2036, now retitled Draft City Plan 2040* (August 2022).

2.5. LOCAL WASTE POLICY (LONDON BOROUGH OF CAMDEN)

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

- London Borough of Camden (LBC), *Camden Local Plan* (2017);
- LBC, *Camden Planning Guidance Design* (2021); and
- LBC, *Waste storage and arrangements for residentials and commercial units (Supporting document for planning guidance CPG1 DESIGN Storage and collection of recycling and waste)* (undated).

3. PROPOSED COMMERCIAL WASTE STRATEGY – FURNIVAL STREET

3.1. INTRODUCTION

3.1.1. This section outlines the strategy which will be adopted to manage the commercial wastes arising from the Proposed Development once operational, and specifically those being managed via the Furnival Street entrance which is located within the planning control of the City of London.

3.1.2. The Furnival Street entrance will be used to dispose of wastes from the Tunnels, and the administration areas including the reception, shop and offices.

3.1.3. It should be noted that the waste generated by the bar area will be managed via the Fulwood Place entrance, and the waste management strategy for this area is detailed in **Section 4**.

3.2. WASTE GENERATION MODEL – FURNIVAL STREET

3.2.1. Estimated commercial waste generation levels have been quantified based on weekly waste generation metrics sourced from British Standard BS5906:2005 Waste Management in Buildings – Code of Practice and WSP experience.

3.2.2. The waste generation metric sourced from BS5906:2005 are summarised in **Table 3-1**.

Table 3-1 - BS5906:2005 Waste Metrics

Waste Source	BS5906:2005 Metric
Retail	10 Litres per m^2
Office	50 Litres per employee

3.2.3. The waste generation metrics sourced from WSP experience are summarised in **Table 3-2**.

Table 3-2 – WSP Waste Metrics

Waste Source	WSP Metric	Basis of Calculation
Staff Changing	10 Litres per m^2	Weekly waste metric, based on Gross Internal Area (GIA)
Reception	100 Litres per Operating Hour	Based on 10 hours a day, 7 days per week.
Tunnels	150 Litres per Operating Hour*	Based on 10 hours a day, 7 days per week.

* *Advised by architects that minimal wastes will be generated, as members of the public will be limited to what can be taken into the Tunnels. Wastes will be generated from toilets, general litter generated by visitors (not food wastes) and waste generated by staff members working in the Tunnels.*

3.2.4. **Table 3-3** summarises the uses and space provision that will be used to calculate the waste volumes that will be managed via the Furnival Street entrance.

Table 3-3 - Development Area Schedule

Activity	Area (m^2)
Retail (GIA)	181
Office (GIA)	58
Staff Changing	9

3.2.5. **Table 3-4** details the estimated visitors for the reception and Tunnels based on estimated numbers provided by the client and design team.

Table 3-4 –Proposed Number of Visitors

Activity	No. of Visitors per Hour
Reception	130
Tunnels	750

3.2.6. **Table 3-5** outlines the estimated waste arising based on a weekly and daily collections.

Table 3-5 - Estimated Weekly and Daily Waste Arising -Furnival Street

Activity	Weekly Waste Arising (Litres/Week)	*Daily Waste Arising (Litres/Day)
Retail	1,810.0	517.1
Office	483.3**	138.1
Staff Changing	90	25.7
Reception	7,000.0	2,000.0
Tunnels	10,500.0	3,000.0
TOTAL	**19,883.3**	**5,680.9**

* *Based on the provision of two days waste storage capacity.*

** *Based on one employee per 6m^2.*

3.2.7. To achieve the GLA's recycling target of 65% as detailed in the London Environment Strategy and the Circular Economy Statements Guidance, the estimated daily waste arisings outlined in **Table 3-5** will be apportioned as detailed in **Table 3-6**.

Table 3-6 – Waste Apportionment

Refuse	Recycling	Food Waste
35%	65%	0%

* *Food waste is excluded as no food will be served to visitors*

3.2.8. Based on the daily waste volumes detailed in **Table 3-5** and the waste apportionments detailed in **Table 3-6**, **Table 3-7** details the estimated daily refuse, recycling and food waste volumes that will be managed via the Furnival Street entrance.

Table 3-7 – Estimated Waste Volumes – Furnival Street

Activity	Refuse (Litres / Day)	Recycling (Litres / Day)	Food Waste (Litres / Day)
Retail	181.0	336.1	0
Office	48.3	89.8	0
Staff Changing	9.0	16.7	0
Reception	700.0	1,300.0	0
Tunnels	1,050.0	1,950.0	0
TOTAL	**1,988.3**	**3,692.6**	**0**

3.2.9. To comply with The London Plan and the forthcoming guidance detailed in **Appendix A**, each waste storage area will be provided with one 240 litre food waste bin.

3.3. PROPOSED WASTE MANAGEMENT STRATEGY

3.3.1. The proposed waste management strategy has been prepared to provide a high-quality but discreet waste management process that does not interrupt the experience of the paying visitors.

3.3.2. It is proposed to provide two main waste storage areas, one will service the below ground facilities (Tunnels) including the visitor attraction and exhibition spaces and the second will service the above ground facilities including the reception, retail unit, office and staff changing facilities.

3.3.3. Each area (i.e., exhibition spaces, offices, retail etc.) will be provided with sufficient waste storage facilities to segregate refuse, recycling and food waste.

3.3.4. The segregated bins will be selected based on their locations and whether they are in public areas and will be sized based on the likely waste volumes that will require storage and the frequency that the bins will need to be emptied.

3.3.5. The segregated bins will be regularly emptied by the on-site facilities management (FM) team and will be transported directly to the appropriate main waste storage area.

3.3.6. Each of the main waste storage areas will be provided with sufficient bins to hold one day's waste. Based on the waste volumes detailed in **Table 3-7**, **Table 3-8** details the types and numbers of bins required in each main waste storage area.

Table 3-8 - Bin Requirements – Main Waste Storage Areas

Activity	Refuse	Recycling	Food Waste
	1,100 Litre Eurobin	1,100 Litre Eurobin	240 Litre Wheeled Bin
Above Ground Facilities			
Retail	0.16	0.31	n/a
Office	0.04	0.08	n/a
Staff Changing	0.01	0.02	n/a
Reception	0.64	1.1	n/a
TOTAL	**1**	**2**	**1**
Below Ground Facilities			
Tunnels	0.95	1.77	n/a
TOTAL	**1**	**2**	**1**
GRAND TOTAL	**2**	**4**	**2**

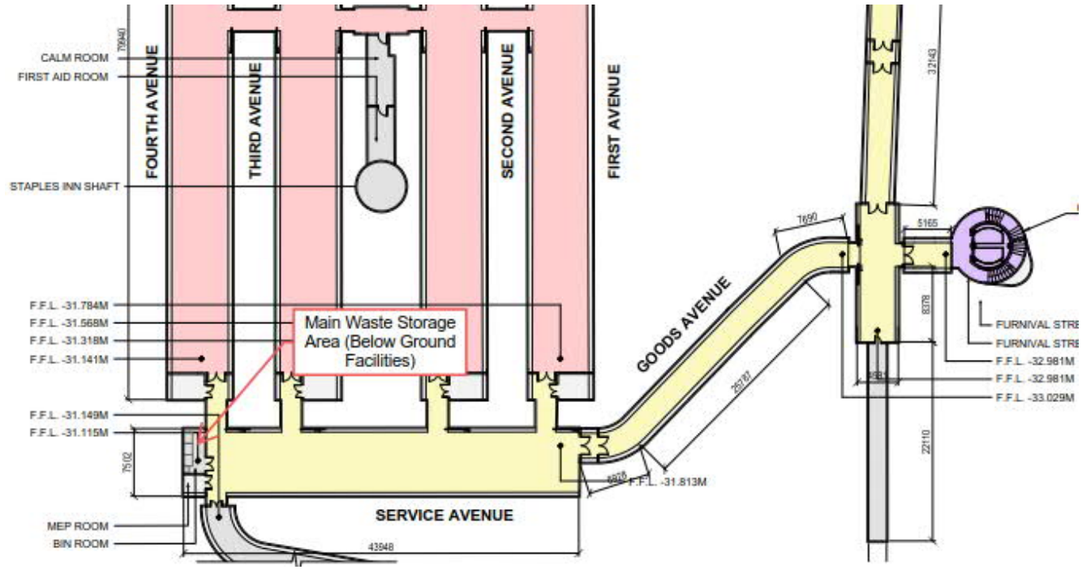
3.3.7. The sizes of the proposed bins are detailed on **Table 3-9**.

Table 3-9 – Bin Dimension

Bin Type	Width (mm)	Depth (mm)	Height (mm)
240 Litre Wheeled Bin	0.59m	0.74m	1.10m
1,100 Litre Wheeled Bin	1.26m	0.98m	1.41m

3.3.8. The main waste storage area provided to service the below ground facilities will be provided within the Tunnels. The location of the main waste storage area is shown in **Figure 3-1**.

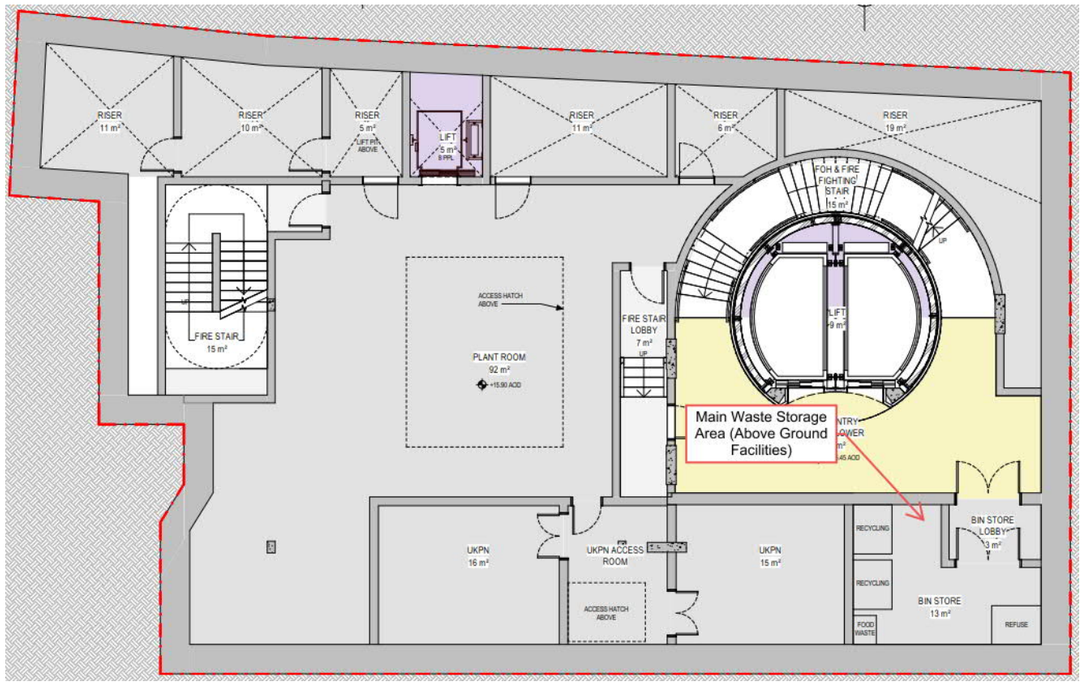
Figure 3-1 - Main Waste Storage Area (Below Ground Facilities)



Source: WilkinsonEyre drawing 01820-WEA-03-ZZ-PD-A-1010

3.3.9. The main waste storage area provided to service the above ground facilities will be provided at level B1. The location of the main waste storage area is shown in **Figure 3-2**.

Figure 3-2 - Main Waste Storage Area (Above Ground Facilities)



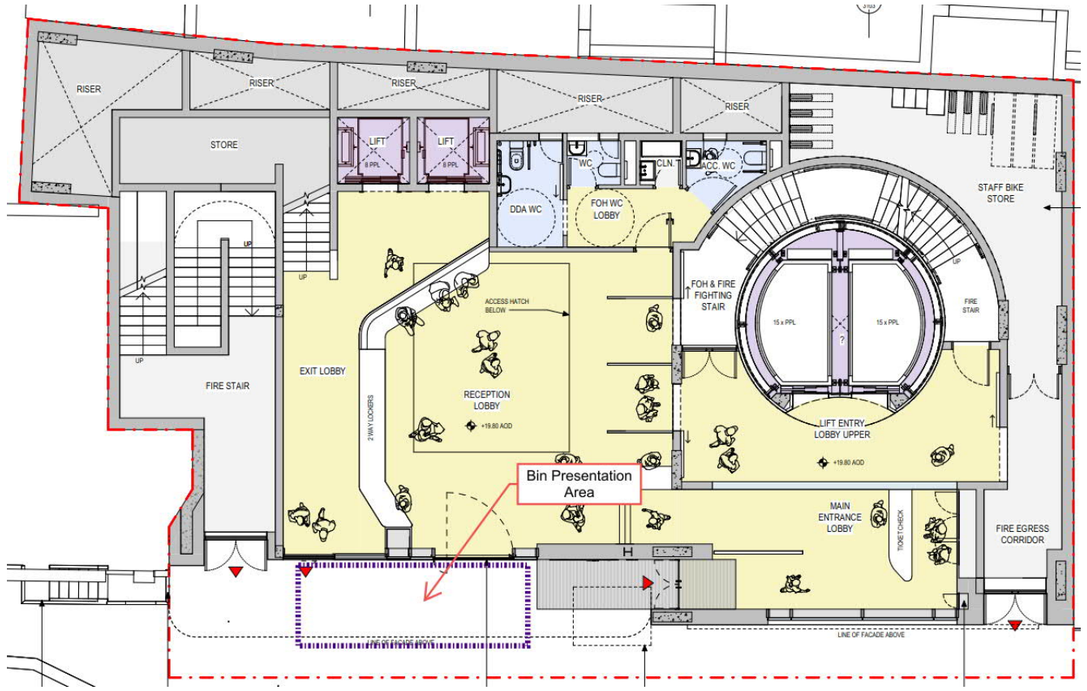
Source: WilkinsonEyre drawing 01820-WEA-01-B1-PD-A-1099

3.3.10. Due to the two main waste storage areas being provide below ground, the bins will have to be transported by the on-site FM team via the passenger/good lifts to an external waste presentation area, which will be the location that they are collected from by the appointed commercial waste contractor. The external waste presentation area will be sized to hold the total number of bins detailed in **Table 3-8**.

3.3.11. In order to avoid any clashes with visitors and other members of the public it is proposed that the waste will be transported to and collected from the waste presentation area outside of the opening hours of the tunnels and exhibition spaces.

3.3.12. The location of the proposed bin presentation area is shown in **Figure 3-3**.

Figure 3-3 – Bin Presentation Area Location



Source: WilkinsonEyre drawing 01820-WEA-01-00-PD-A-1100

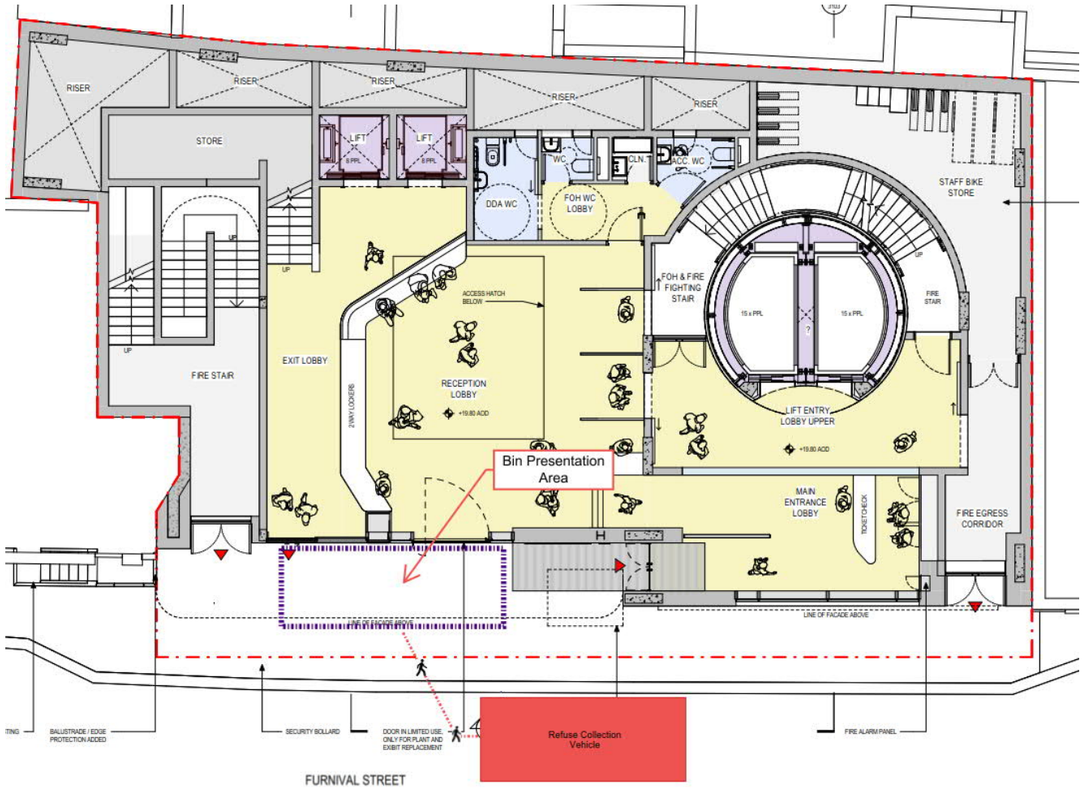
3.3.13. It should be noted that whilst the bin presentation area sits outside the building line, the bins will be within the developments red line boundary (refer to **Figure 3-3**).

3.3.14. Due to existing site constraints including road widths etc. the on-site FM team will appoint a commercial waste contractor who operates waste collections using either caged vehicles or small refuse collection vehicles.

3.3.15. The appointed commercial waste contractor will park on Furnival Street and will collect the bins directly from the waste presentation area.

3.3.16. The notional parking location for the refuse collection vehicle (RCV) is shown in **Figure 3-4**.

Figure 3-4 – RCV Parking Location



Source: WilkinsonEyre drawing 01820-WEA-01-00-PD-A-1100

3.3.17. Once the bins have been emptied, the appointed commercial waste contractor will return them to the bin presentation area and then the on-site FM team will return them to the main waste storage areas.

4. PROPOSED COMMERCIAL WASTE STRATEGY – FULWOOD PLACE

4.1. INTRODUCTION

4.1.1. This section outlines the strategy which will be adopted to manage the commercial wastes arising from the Proposed Development once operational, and specifically those being managed via the Fulwood Place entrance which is located within the planning control of the London Borough of Camden.

4.1.2. The Fulwood Place entrance will be used to dispose of wastes from the bar area that will be provided within the Tunnels.

4.1.3. It should be noted that the wastes generated from the Tunnels, and administration areas including the reception, shop and offices will be managed via the Furnival Street entrance, and the waste management strategy for these areas is detailed in **Section 3**.

4.2. WASTE GENERATION MODEL – FULWOOD PLACE

4.2.1. Estimated commercial waste generation levels have been quantified based on weekly waste generation metrics sourced from British Standard BS5906:2005 Waste Management in Buildings – Code of Practice and WSP previous experience.

4.2.2. The waste generation metric sourced from BS5906:2005 is summarised in **Table 4-1.**

Table 4-1 – BS5906:2005 Waste Metric

Waste Source	BS5906:2005 Metric
Restaurant	75 Litres per cover

4.2.3. The above waste metric is applicable to a restaurant that prepares and serves food to customers as well as providing refreshments etc. whilst the proposed bar area will only serve drinks and will not serve meals but may sell light snacks.

4.2.4. Based on the above understanding it is proposed to reduce the above waste generation metrics by one third to better reflect the likely waste volumes that will be generated. **Table 4-2** details the revised waste generation metric that will be used for the bar area.

Table 4-2 – BS5906:2005 Waste Metric (Revised)

Waste Source	BS5906:2005 Metric
Restaurant	50 Litres per cover

4.2.5. **Table 4-3** summarises the use class and the maximum capacity of the bar area.

Table 4-3 – Maximum Capacity of Bar Area

Activity	Maximum Capacity (No.)
Bar Area	160

4.2.6. **Table 4-4** outlines the estimated waste arising based on a weekly and daily collection.

Table 4-4 – Estimated Weekly and Daily Waste Arisings – Fulwood Place

Activity	Weekly Waste Arising (Litres/Week)	*Daily Waste Arising (Litres/Day)
Bar Area	8,000	2,286

* *Based on the provision of two days waste storage capacity.*

4.2.7. To achieve the GLA's recycling target of 65% detailed in the London Environment Strategy and the Circular Economy Statement Guidance, the daily waste volumes detailed in **Table 4-4** have been apportioned as detailed in **Table 3-6**. **Table 4-5** details the estimated daily refuse, recycling and food waste volumes that will be managed via the Fulwood Place entrance.

Table 4-5 – Estimated Waste Volumes – Fulwood Place

Activity	Refuse (Litres/Day)	Recycling (Litres/Day)	Food (Litres/Day)
Bar Area	800	1,486	0

4.2.8. To comply with The London Plan and forthcoming guidance detailed in **Appendix A,** one 240 litre food waste bin will be provided**.**

4.3. PROPOSED WASTE MANAGEMENT STRATEGY

4.3.1. The proposed waste management strategy has been prepared to provide a high-quality but discreet waste management process that does not interrupt the experience of the paying visitors.

4.3.2. It is proposed to provide a main waste storage area that will be used to store the wastes generated within the bar area.

4.3.3. The tenant will be required to provide sufficient temporary waste storage areas within their tenanted space to segregate refuse, recycling and food waste. The volume of storage capacity will be dependent on the following factors:

- The number of staff;
- The business activities occurring; and
- The frequency that the refuse and recyclables will be transported from their unit to the main waste storage area.

4.3.4. At regular intervals the tenant's staff or their appointed FM contractor will transport the wastes from the temporary waste storage areas to the main waste storage area where they will place the wastes into the appropriately labelled bins.

4.3.5. The main waste storage area will be provided with sufficient bins to hold one day's waste. Due to the size of the lifts servicing the bar area it is not possible to use 1,100 litre Eurobins to store refuse and recycling, and it is therefore proposed to store and present these wastes in 360 litre wheeled bins.

4.3.6. Based on the waste volumes detailed in **Table 4-5**, **Table 4-6** details the types and numbers of bins required in the main waste storage area.

Table 4-6 – Bin Requirements – Main Waste Stores

Activity	Refuse (360 Litre Wheeled Bin)	Recycling (360 Litre Wheeled Bin)	Food Waste (240 Litre Wheeled Bin)
Bar Area	3	5	1

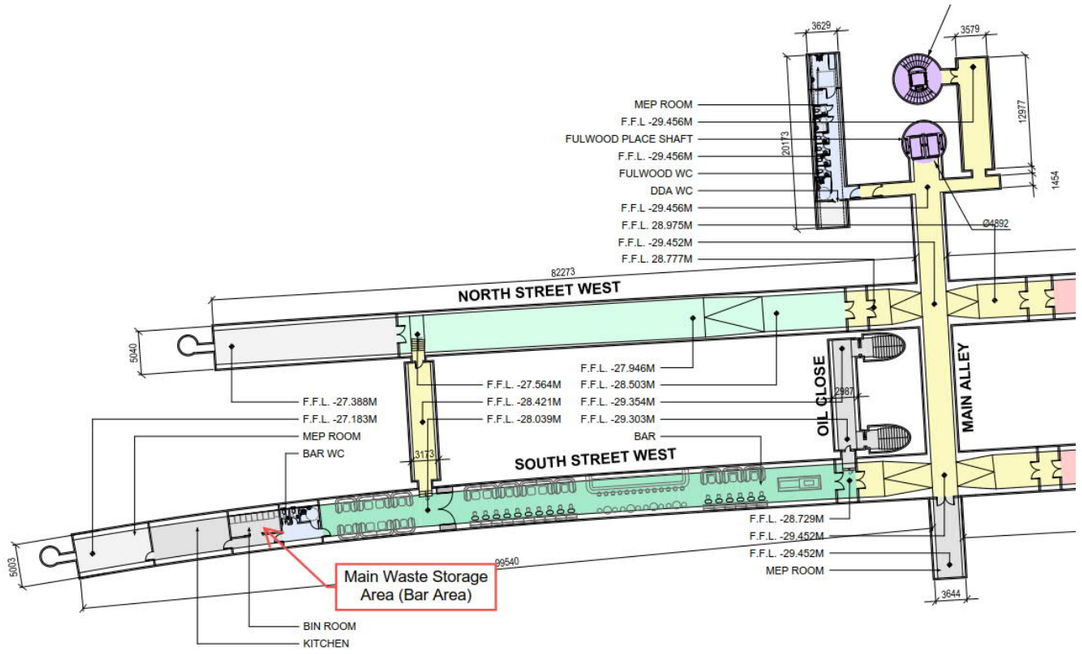
4.3.7. The sizes of the proposed bins are detailed on **Table 4-7**.

Table 4-7 – Bin Dimensions

Bin Type	Width (mm)	Depth (mm)	Height (mm)
240 Litre Wheeled Bin	0.59m	0.74m	1.10m
360 Litre Wheeled Bin	0.66m	0.88m	1.10m

4.3.8. The main waste storage area provided to service the bar area will be provided within the Tunnels. The location of the main waste storage area is shown in **Figure 4-1**.

Figure 4-1 - Main Waste Storage Area (Bar Area)



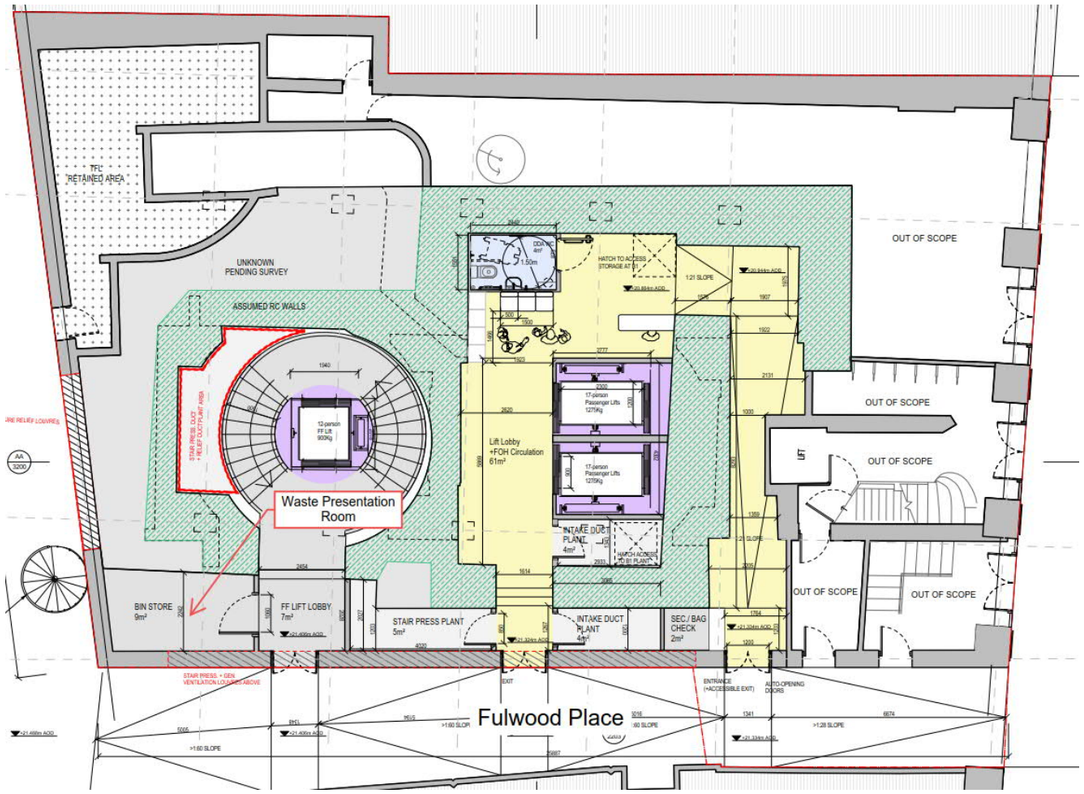
Source: WilkinsonEyre drawing 01820-WEA-03-ZZ-PD-A-1011

4.3.9. As the main waste storage area is provided below ground, the bins will have to be transported by the on-site FM team via the passenger/good lift to the waste presentation room at ground floor level, which will be the location that they are collected from by the appointed commercial waste contractor. The waste presentation room has been sized to hold the total number of bins detailed in **Table 4-6**.

4.3.10. In order to avoid any clashes with visitors and other members of the public it is proposed that the waste will be transported to and collected from the waste presentation room outside of the opening hours of the bar area.

4.3.11. The location of the proposed waste presentation room is shown in **Figure 4-2**.

Figure 4-2 – Waste Presentation Room Location



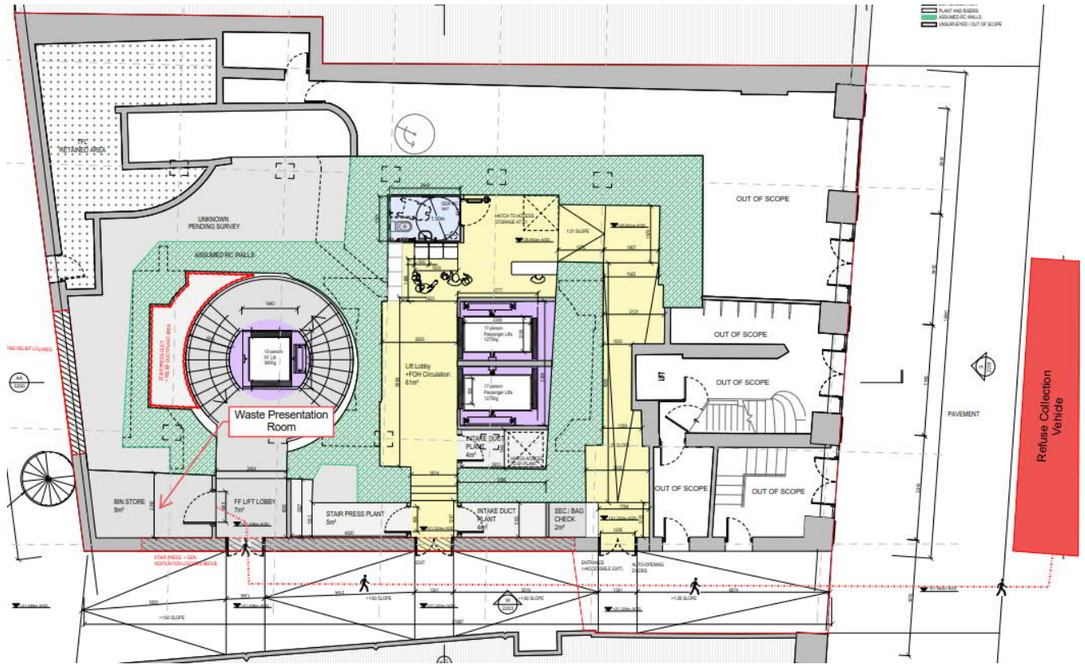
Source: WilkinsonEyre drawing 01820-WEA-02-00-DR-A-1200

4.3.12. Due to the bar area's entrance being located on a pedestrian only route (Fulwood Place) with no direct vehicle access, it is not possible to provide a parking location for the RCV in close proximity to the waste presentation room.

4.3.13. The appointed commercial waste contractor will therefore park on High Holborn and will collect the bins directly from the waste presentation room.

4.3.14. The notional parking location for the refuse collection vehicle (RCV) is shown in **Figure 4-3**.

Figure 4-3 – RCV Parking Location



Source: WilkinsonEyre drawing 01820-WEA-02-00-DR-A-1200

4.3.15. Once the bins have been emptied, the appointed commercial waste contractor will return them to the waste presentation room and then the on-site FM team will return them to the main waste storage area.

5. SUMMARY AND CONCLUSIONS

5.1. WASTE MANAGEMENT STRATEGY SUMMARY

5.1.1. The wastes generated within the Proposed Development will be managed via the entrances in Furnival Street which is located within the administrative boundaries of City of London and in Fulwood Place which is located within the London Borough of Camden.

Furnival Street

5.1.2. The Furnival Street entrance will be used to manage the wastes generated within the Tunnels, and the administration areas including the reception, shop and offices.

5.1.3. Two main waste storage areas will be provided to service the waste managed via the Furnival Street entrance. The Tunnels will be serviced via a main waste storage area provided within the tunnels, and the administration areas will be serviced via a main waste storage area provided at level B1.

5.1.4. The waste generated within each area within the development will be temporarily stored in segregated waste bins before being transported to the main waste storage areas by the on-site FM team where it will be placed into labelled segregated bins.

5.1.5. On a daily basis, and outside of the opening hours for the Tunnels and exhibition spaces the on-site FM team will transfer the bins from the main waste storage areas to a waste presentation area on Furnival Street.

5.1.6. The waste management contractor appointed by the on-site FM team will collect the bins from the waste presentation area.

5.1.7. Once the bins have been emptied, the appointed commercial waste contractor will return them to the bin presentation area and then the on-site FM team will return them to the main waste storage areas.

Fulwood Place

5.1.8. The Fulwood Place entrance will be used to manage the wastes generated within the bar area which will be located within the Tunnels.

5.1.9. A main waste storage area will be provided within the Tunnels to store the segregated wastes prior to collection.

5.1.10. On a daily basis, and outside of the opening hours for the bar area the on-site FM team will transfer the bins from the main waste storage areas to the ground floor waste presentation room.

5.1.11. The appointed waste contractor will collect the bins directly from the waste presentation room and will transport them to the refuse collection vehicle parked on High Holborn.

5.1.12. Once the bins have been emptied, the appointed commercial waste contractor will return them to the waste presentation room and then the on-site FM team will return them to the main waste storage area.

5.2. CONCLUSION

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

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

APPENDIX A: NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

NATIONAL WASTE POLICY

National Planning Policy Framework (Updated 2023)[1]

The National Planning Policy Framework, published in 2012 and last updated in September 2023, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving 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)[2]

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)[3]

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.

Waste Management Plan for England (2021)[4]

The Waste Management Plan for England fulfils the requirements of the Waste (England and Wales) Regulations 2011 for waste management plans to be reviewed every six years.

While the Resources and Waste Strategy sets out a vision and a number of policies to move to a more circular economy, such as waste prevention through policies to support reuse, repair and remanufacture activities, the Waste Management Plan for England focuses on waste arisings and their management. It is a high-level, non-site specific document. It provides an analysis of the current waste management situation in England and evaluates how the Plan will support implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.

LONDON WASTE POLICY & GUIDANCE

The London Plan **(March 2021)**[5]

The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan.

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[1] Ministry of Housing, Communities and Local Government (MHCLG) (2023) *National Planning Policy Framework* National Planning Policy Framework (publishing.service.gov.uk)

[2] MHCLG (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

[3] 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

[4] Defra (2021) *Waste Management Plan for England* https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

[5] GLA (2021) *The London Plan* https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

***London Environment Strategy* (2018)[6]**

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).'

***London Plan Guidance, Circular Economy Statements (2022)*[7]**

The London Plan Guidance Circular Economy Statements puts circular economy principles at the heart of designing new buildings, requiring buildings that can be more easily dismantled and adapted over their lifetime. It treats building materials as resources rather than waste, and puts in place a clear hierarchy prioritising the retention of existing structures above demolition, where this is the more sustainable and appropriate approach.

The guidance applies to the largest developments in London that are referable to the Mayor, as required by London Plan Policy 2021 SI 7,however boroughs are encouraged to apply the policies for smaller developments.

LOCAL WASTE POLICY & GUIDANCE (CITY OF LONDON)

City of London Local Plan (Adopted January 2015)[8]

The Local Plan sets out the City Corporation's vision, strategy, objectives and policies for planning. It provides a spatial framework that brings together and co-ordinates a range of strategies prepared by the City Corporation, its partners and other agencies and authorities. It includes policies for deciding development proposals. It takes account of projected changes in the economy, employment, housing need, transport demand, and seeks to maintain the quality of the City's environment and its historic environment. It provides the strategy and policies for shaping the City until 2026 and beyond.

With regards to waste management, the following Local Plan policies are of relevance:

'Core Strategic Policy CS17: Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW) by:

1. Enabling waste minimisation and adherence to the waste hierarchy:

(i) requiring the provision of facilities for waste segregation, handling and management within new developments;

(ii) increasing the proportion of municipal solid waste recycled to at least 45% by 2015 in line with the City of London Waste Strategy;

(iii) promoting improved waste management choices for businesses and residents.'

'Policy DM 17.1 Provision for waste in development schemes

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.'

Proposed Submission Draft City Plan 2036 (March 2021)[9]

The current CoL Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look.

Local Plans are required to look ahead over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

[6] GLA (2018) *London Environment Strategy* https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

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

[8] CoL (2015) *Local Plan* https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf

[9] CoL (2021) *Proposed Submission Draft City Plan 2036* https://www.cityoflondon.gov.uk/assets/Services-Environment/cityplan-2036-march-2021.pdf

However, they must also be reviewed at least every five years to take account of changing circumstances affecting the area, or any relevant changes in national policy.

Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system through its planning reform agenda, with notable changes being made to permitted development rights and the Use Classes Order during 2020. As a result, a number of policies need updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London has reviewed the London Plan which provides a strategic planning framework for London for the period up to 2041.

Following consultation on the Proposed Submission Plan, it will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan, which is expected to be adopted in 2022.

With regards to waste management, the following City Plan policies are of relevance:

'Strategic Policy S16: Circular Economy and Waste

1. *The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.'*

'Policy CE1 Zero Waste City

…

2. *All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.'*

Due to issues raised by The Mayor of London in relation to tall buildings and to a range of other factors, including the ongoing impacts of the Covid-19 pandemic, the Draft City Plan process will be paused. This will allow time to undertake more evidence gathering and ensure that the Draft City Plan will provide a robust framework for a post Covid City. The Draft City Plan's end date has been changed to 2040 to align with the commitment in the City Corporation's Climate Action Strategy to support the achievement of net zero for the Square Mile by 2040.

LOCAL WASTE POLICY & GUIDANCE (LONDON BOROUGH OF CAMDEN)

Camden Local Plan (2017)[10]

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted 2010). The plan is intended to ensure that Camden provides robust, effective and up-to-date planning policies. The Local Plan will cover the period 2016 to 2031.

The following policies are of relevance to waste management:

Policy CC5 Waste

The council will seek to make Camden a low waste borough:

We will:

a. aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 20131;

b. deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;

c. safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and

d. make sure that developments include facilities for the storage and collection of waste and recycling.

Camden Planning Guidance Design (2021)[11]

This guidance supports the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional "material consideration" in planning decisions.

The Camden Planning Guidance covers a range of topics (such as housing, sustainability, amenity and planning obligations) and should be read in conjunction with each other, and within the context of Camden's local plan.

[10] London Borough of Camden (2017) *Camden Local Plan* *https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6*

[11] London Borough of Camden (2021) *Camden Planning Guidance Design* https://www.camden.gov.uk/documents/20142/4823269/Design+CPG+Jan+2021.pdf/086b8201-aa57-c45f-178e-b3e18a576d5e?t=1611580522411

Waste storage and arrangements for residentials and commercial units (Supporting document for planning guidance CPG1 DESIGN Storage and collection of recycling and waste) (undated)12

The guidance seeks assist those involved in the design and management of buildings to best provide for the temporary storage and transfer of wastes to maximise the type and amounts that can be reused or sent for recycling or repurposing.

Planning for all waste and storage should ensure that;

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

[12] London Borough of Camden (Undated) *Waste storage and arrangements for residential and commercial units (Supporting document for planning guidance CPG1 DESIGN Storage and collection of recycling and waste)* https://www.camden.gov.uk/documents/20142/0/ES+Technical+Waste+Planning+Guidance+2018final+-+FV+%5BPDF%5D.pdf/4f682792-29fa-89ca-00b1-f2a7fb5a6

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