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1 - 3 ARKWRIGHT ROAD, CAMDEN

Waste Management Strategy

Alpha Plus Group Ltd.

January 2015

Quality Management

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Prepared by	Christopher Parr	Christopher Parr		
Checked by	Michael Berney	Michael Berney		
Authorised by	Matthew Venn	Matthew Venn		
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Client

Alpha Plus Group Ltd.
50 Queen Anne Street
London
W1G 8HJ

Consultant

WSP UK Ltd.
WSP House
70 Chancery Lane
London
WC2A 1AF

Tel: +44 (0)207 314 5000
Fax: +44 (0)207 314 5111

www.wspgroup.co.uk

Registered Address

WSP UK Limited
01383511
WSP House, 70 Chancery Lane, London, WC2A 1AF

WSP Contacts

Christopher Parr, Consultant

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Appendix 1 - National, London and Local Waste Policy & Guidance

Abbreviations

BS	British Standard
DCLG	Department for Communities and Local Government
Defra	Department for Environment, Food and Rural Affairs
LBC	London Borough of Camden
LWaRB	London Waste and Recycling Board
NPPF	National Planning Policy Framework
PPS	Planning Policy Statement

1 Introduction

1.1 Project Background

- 1.1.1 WSP UK Ltd. has been commissioned by Alpha Plus Group Ltd. to prepare a Waste Management Strategy for a planning application for St. Anthony's Preparatory School, 1 - 3 Arkwright Road (hereafter referred to as the 'Proposed Development').
- 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 arisings.

1.2 Proposed Development & Application Site Description

Proposed Development

- 1.2.1 The Proposed Development is to add a one form entry for girls at the existing St. Anthony's school. It is proposed the additional element to the school will provide space for an additional 140 pupils, taking the total number of pupils up to 389.

Application Site and its Setting

- 1.2.2 The Site, which falls within the Fitzjohns and Netherhall Conservation Area in the London Borough of Camden (LBC), is nearby to the A41 Finchley Road and within walking distance of Hampstead High Street.

1.3 Report Structure

- 1.3.1 This report is set out in the following format:
- **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** - details the strategy which will be adopted to successfully manage the waste arisings from the Proposed Development.
 - **Section 4: Summary & Conclusions.**
 - **Appendix 1: National, London and Local Waste Policy & Guidance.**

2 Waste Legislation, Policy and Guidance

2.1 Introduction

2.1.1 This section contains details of the national legislation that have relevance to the Proposed Development. 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:

- **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.
- **Revised Waste Framework Directive (2008)** - Clarifies the definition of 'waste' and of other concepts such as 'recycling' and 'recovery'. It has applied a new Waste Hierarchy, expanded the 'polluter pays' principle by emphasising producer responsibility, applies more stringent waste reduction and waste management targets for Member States and requires enhanced content in waste management plans.

2.3 National, London and 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 1**:

- National Planning Policy Framework (2012);
- National Planning Policy for Waste (2014);
- Waste Management Plan for England (2013);
- The Mayor's Vision for London's Waste (2010);
- Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2010);
- The London Plan: Spatial Development Strategy for Greater London (2011);
- LBC, Camden Core Strategy 2010-2025 (Adopted November 2010); and
- LBC, Camden Planning Guidance 'Design': CPG1 (2014).

3 Management of Operational Waste

3.1 Introduction

3.1.1 This chapter details the strategy which will be adopted to successfully manage the waste arisings from the Proposed Development once operational.

3.2 Commercial Waste Modelling

3.2.1 Estimated commercial waste generation at the Proposed Development has been quantified based on equations for weekly waste arisings taken from a Supplementary Guidance Document¹ of the London Borough of Tower Hamlets, as LBC could not provide this information. For the purpose of planning, this approach has been deemed acceptable by Althea Marshall, Business Waste Sales Officer at LBC, on 9th January 2015.

3.2.2 **Table 3.1** outlines the estimated weekly commercial waste arisings from the Proposed Development once operational.

Table 3.1: Estimated commercial waste arisings

Description	Equation for weekly waste arisings (LBTH guidance)	Total number of pupils	Total refuse capacity required (litres)	Total recycling capacity required (litres)
Primary School	1.5m ³ of waste storage/100 pupils	389*	5,835	3,890
	1.0m ³ of recycling storage/100 pupils			

* Collective number of pupils; No.1 and No.3 will have 249 and 140 pupils respectively.

3.2.3 The number of containers needed to meet the capacity requirements for commercial waste has been provided in **Table 3.2** based on a collection frequency of three times per week and two times per week for refuse and recycling respectively; these storage capacity requirements have been deemed to be sufficient by Althea Marshall on 9th January 2015. at LBC. It has been assumed that 1,100 litre Eurobins will be used in the waste stores servicing both No.1 and No.3 Arkwright Road.

Table 3.2: Waste container requirements - commercial waste

Description	Refuse	Recycling	Total
No.1 (1,100 litre)	1	1	2
No.3 (1,100 litre)	1	1	2

3.2.1 In accordance with BREEAM requirements (specifically *Wst 03 Operational Waste: Criterion 5*), a school recycling policy and an outline of the procedures that are in operation or that will be in place when the building is complete will be produced by the school. As a minimum, the policy will cover:

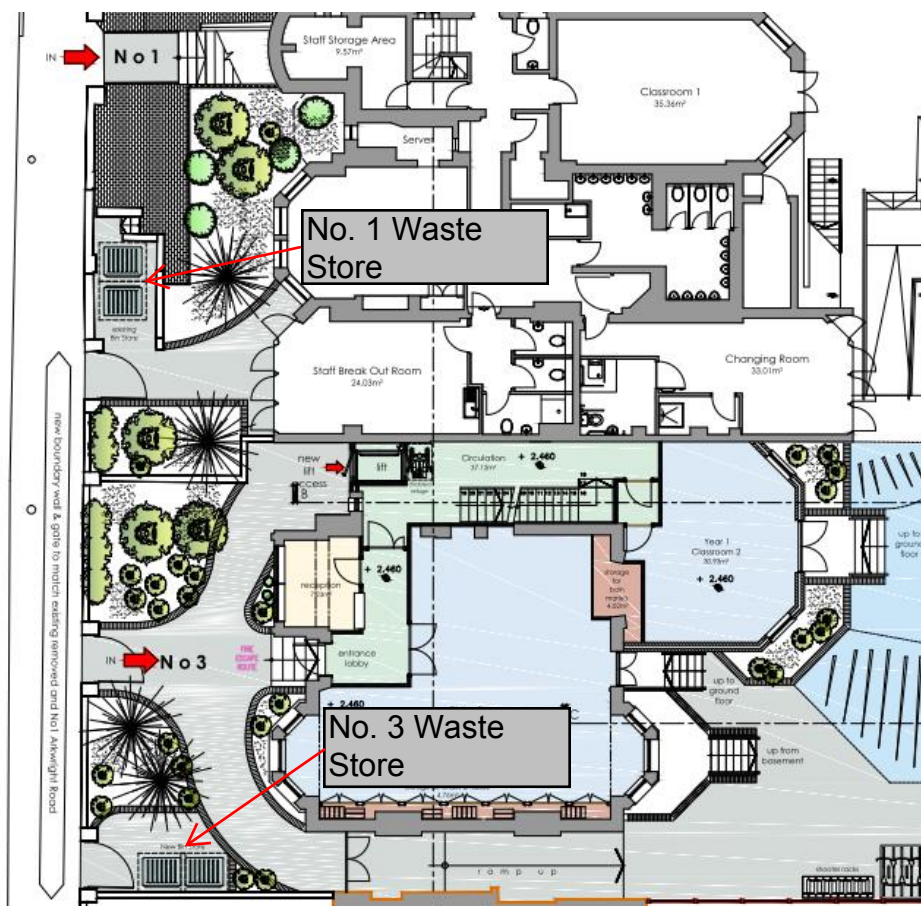
- Paper and magazines, cardboard, plastics, metals, printer and toner cartridges; and
- Where composting facilities are provided, the policy must also cover the collection of the compost unless the compost can be used on-site.

¹ LBTH (2012) *Refuse and Recycling Storage and Collection Supplementary Guidance*

3.3 Storage of Commercial Waste

- 3.3.1 Waste arisings throughout the school will be temporarily stored in domestic-type waste containers/bins prior to being manually transported by Facilities Management (FM) to the permanent waste stores located at the front of both No.1 and No.3. The locations of the respective waste stores servicing No.1 and No.3 are shown below in **Figure 3.1**.
- 3.3.2 In conformance with LBC's guidance, the permanent waste stores will be sized to include a minimum clear space of 150mm between and around containers. When disposing waste into the containers it is possible to access both containers without moving the other due to the waste stores main entrance and also the small stairwell at the opposite end of the waste store.
- 3.3.3 All waste storage areas will be clearly labelled to ensure cross contamination of refuse and recycling is minimised.

Figure 3.1: Main waste store locations (extracted from drawing number A400)



3.4 Collection of Commercial Waste

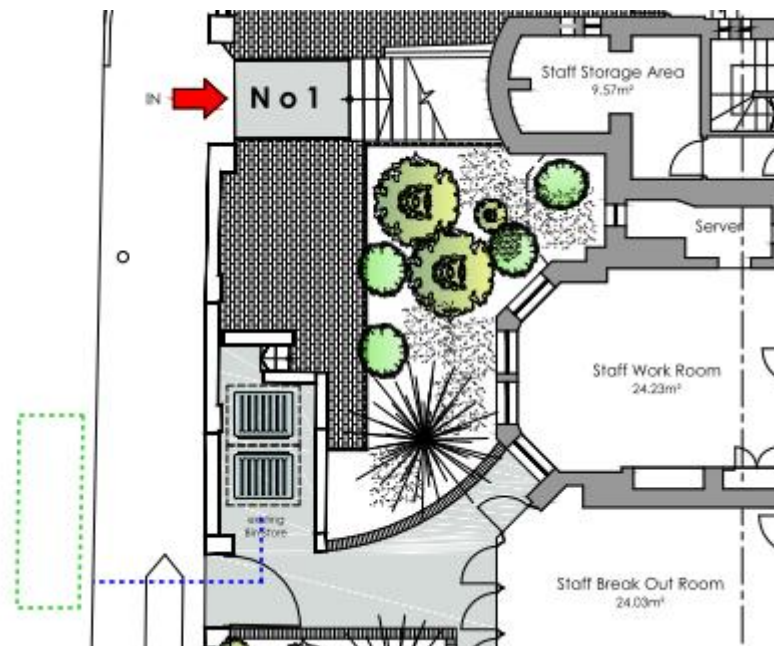
No.1 Arkwright Road

- 3.4.1 It will be the school's responsibility to arrange the collection of refuse and recycling from No.1 with a commercial waste collection contractor, who would be asked to tender for the collection of refuse and recycling from this element of the school.
- 3.4.2 Collection crews will be responsible for accessing the waste store (No.1) and transporting containers out to the refuse collection vehicle to be emptied; before promptly returning the containers to the

waste store. The proposed layout of the waste store will require collection crews to remove one container so as to access the other. Given that the worst case scenario would require only one bin to be removed so as to access the other, this approach and the layout of this waste store has been deemed acceptable by Althea Marshall at LBC on 9th January 2015.

3.4.3 **Figure 3.2** below shows the waste store and refuse collection point associated with No.1.

Figure 3.2: No.1 waste store and associated refuse collection point (extracted from drawing number A400)



* Blue dotted line: transport route of containers to and from refuse collection point

* Green dotted line: refuse collection point

3.4.4 Paths between the waste store and refuse collection point will be a minimum width of 1.5 metres, free from kerbs or steps, have a solid foundation and be suitably paved with a smooth and continuous finish.

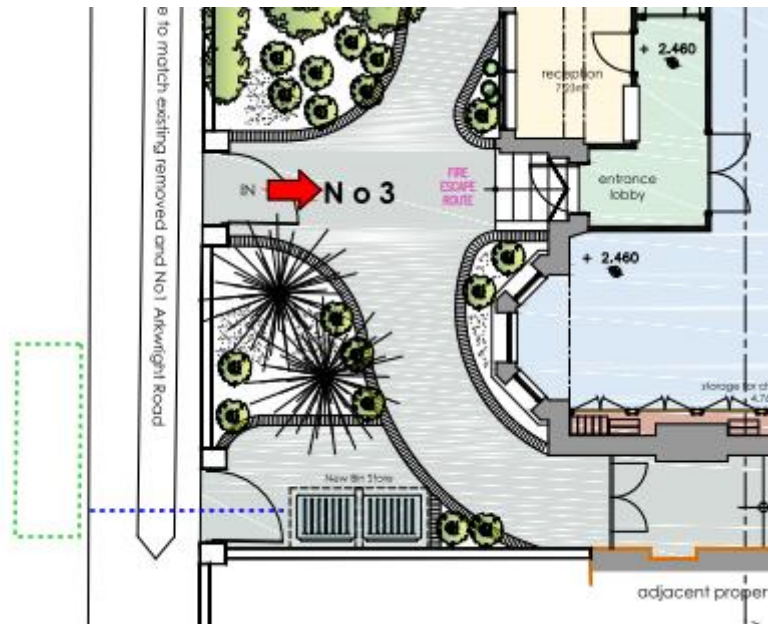
No.3 Arkwright Road

3.4.5 It will be the school's responsibility to arrange the collection of refuse and recycling from No.3 with a commercial waste collection contractor, who would be asked to tender for the collection of refuse and recycling from this element of the school.

3.4.6 Collection crews will be responsible for accessing the waste store (No.3) and transporting containers out to the refuse collection vehicle to be emptied; before promptly returning the containers to the waste store. The waste store has been sized to enable each container to be accessed without having to move the other.

3.4.7 **Figure 3.3** below shows the waste store and refuse collection point associated with No.3.

Figure 3.3: No.3 waste store and associated refuse collection point (extracted from drawing number A400)



* Blue dotted line: transport route of containers to and from refuse collection point

* Green dotted line: refuse collection point

3.4.8 Paths between the waste store and refuse collection point will be a minimum width of 1.5 metres, free from kerbs or steps, have a solid foundation and be suitably paved with a smooth and continuous finish.

4 Summary and Conclusion

4.1 Summary of the Strategy

Waste from the Operational Phase

- 4.1.1 It has been assumed that 1,100 litre Eurobins will be used in the waste stores servicing both No.1 and No.3 Arkwright Road and that there will be a collection frequency of three times per week and two times per week for refuse and recycling respectively.
- 4.1.2 Based on the aforementioned collection frequency, two 1,000 litre Eurobins would be required in the waste stores servicing both No.1 and No.3 to meet the capacity requirements of commercial waste generated at the school as shown in **Table 3.1**.
- 4.1.3 Waste arisings throughout the school will be temporarily stored in domestic-type waste containers/bins prior to being manually transported by FM to the main waste stores located at the front of both No.1 and No.3.
- 4.1.4 The collection crew will remove the bins from the bin stores areas, empty them into the collection vehicle and then return the bins back to their respective waste stores.

4.2 Conclusion

- 4.2.1 This Waste Management Strategy has taken into account the need to lessen the overall impact of waste generation from the Proposed Development.
- 4.2.2 The proposals set out in this Strategy meet the requirements of relevant waste policy and follow applicable guidance.
- 4.2.3 Means by which to further reduce the waste arisings and increase recycling rates from the Proposed Development have been identified, to ensure that the Proposed Development can contribute to improved waste management performance.

Appendix 1 - National, London and Local Waste Policy & Guidance

National Waste Policy

National Planning Policy Framework (2012)²

The National Planning Policy Framework ('the Framework') sets out the Government's economic, environmental and social planning policies for England and provides a framework within which local people and councils can produce local and neighbourhood plans. Most of the existing Planning Policy Statements (PPSs) have been abolished and replaced by 12 'core' planning principles.

Unfortunately, the Framework does not provide much clarity on planning policy for the development of waste infrastructure and states that:

'This Framework does not contain specific waste policies, since national waste planning policy will be published as part of the National Waste Prevention Plan for England. However, local authorities preparing waste plans and taking decisions on waste applications should have regard to policies in this Framework so far as relevant.'

Further policy and guidance is expected to be included in the Waste Management Plan for England which will replace Waste Strategy for England 2007 for these purposes. This may not be published until the end of 2013³.

National Planning Policy for Waste (2014)⁴

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)

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 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.'*

² Department for Communities and Local Government (DCLG) (2012) *National Planning Policy Framework*
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2115939.pdf>

³ Department for Environment, Food and Rural Affairs (Defra) (2012) *Progress with delivery of commitments from the Government's Review of Waste Policy in England (2011)*
<http://www.defra.gov.uk/publications/files/pb13738-waste-review-progress.pdf>

⁴ 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

- *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:

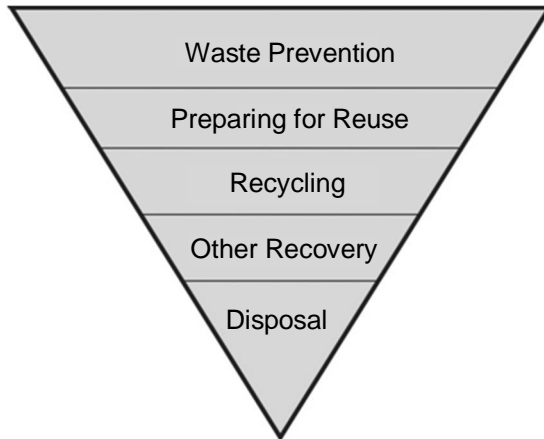
- *In pursuance of the objectives and measures in Directive 94/62/EC (on packaging and packaging waste), a chapter on the management of packaging and packaging waste, including measures taken pursuant to Articles 4 and 5 of that Directive.*
- *Measures to promote high quality recycling including the 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.'*

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 1**.

Figure 1: The Waste Hierarchy



Source: Waste Framework Directive

The main principles of the Waste Hierarchy are:

- Waste should be prevented or reduced at source as far as possible;
- Where waste cannot be prevented, waste materials or products should be reused directly or refurbished and then reused;
- Waste materials should be recycled or reprocessed into a form that allows them to be reclaimed as a secondary raw material;
- Where useful secondary materials cannot be reclaimed, the energy content of the waste should be recovered and used as a substitute for non-renewable energy resources; and
- Only if waste cannot be prevented, reclaimed or recovered, should it be disposed of into the environment and this should only be undertaken in a controlled manner.

The Waste Hierarchy has been implemented in England and Wales by the *Waste (England and Wales) Regulations 2011*. These regulations require that an establishment or undertaking that imports, produces, collects, transports, recovers or disposes of waste must take reasonable steps to apply the Waste Hierarchy when waste is transferred or disposed of.

Waste Policy & Guidance for London

The Mayor's vision for London's waste (2010)⁵

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 recycle or compost 70% of C&I waste by 2020, maintaining this performance to 2031.

⁵ Greater London Authority (2010) *The Mayor's vision for London's waste*
<http://legacy.london.gov.uk/mayor/environment/waste/docs/vision-jan2010.pdf>

-
- 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 London⁶

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 Greater London (2011)⁷

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

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

Policy 5.16 Waste self-sufficiency

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

- *manage as much of London's waste within London as practicable, working towards managing the equivalent of 100% of London's waste within London by 2031;*
- *create positive environmental and economic impacts from waste processing, and*
- *work towards zero biodegradable or recyclable waste to landfill by 2031.*

This will be achieved by targeting the following:

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

Local Waste Policy

LBC, Camden Core Strategy 2010-2025 (Adopted November 2010)⁸

Camden's Core Strategy sets out the key elements of the Council's planning vision and strategy for the borough. It is the central part of our Local Development Framework (LDF), a group of documents setting out Camden's planning strategy and policies.

⁶ Greater London Authority (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>

⁷ Greater London Authority (2011) *The London Plan*
<http://www.london.gov.uk/sites/default/files/The%20London%20Plan%202011.pdf>

⁸ LBC (2010) *Camden Core Strategy 2010-2025*
<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-core-strategy/>

The Core Strategy will, along with other Local Development Framework documents, replace Camden's current Unitary Development Plan (2006).

The following policies are of relevance to waste management:

CS18 – Dealing with our waste and encouraging recycling

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 re-use of materials to meet our targets of 40% of household waste recycled by 2010, 45% by 2015 and 50% by 2020;*
- b) make sure that developments include facilities for the storage and collection of waste and recycling;*
- c) deal with North London's waste by working with our partner boroughs in the North London Waste Authority to produce a North London Waste Plan, which will ensure that facilities are provided to meet the amount of waste allocated to the area in the London Plan;*
- d) safeguard Camden's existing waste site at Regis Road.*

LBC, Camden Planning Guidance 'Design': CPG1 (2014)⁹

This guidance document supports a range of both Core Strategy and Development policies. The purpose of this guidance is to promote design excellence and to outline the ways in which high quality design within developments can be achieved.

⁹ LBC (2014) Camden Planning Guidance 'Design': CPG1
http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=3235609

WSP UK
WSP House
70 Chancery Lane
London
WC2A 1AF

Tel: +44 (0)207 314 5000
Fax: +44 (0)207 314 5111
www.wspgroup.co.uk

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