



OD Camden Hotel Limited

5-17 HAVERSTOCK HILL

Waste Management Strategy





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Waste Management Strategy

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NATIONAL, LONDON AND LOCAL WASTE POLICY & GUIDANCE

APPENDIX B

EMAIL CORRESPONDENCE FROM LINDA HALL-BRUNTON - DATED 14 JULY 2020

APPENDIX C

EMAIL CORRESPONDENCE FROM LINDA HALL-BRUNTON - DATED 4 AUGUST 2020

1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1. WSP has been commissioned by OD Camden Hotel Limited to prepare a Waste Management Strategy for 5-17 Haverstock Hill (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 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 PROPOSED DEVELOPMENT

- 1.2.1. Demolition of existing building and erection of a part six, part seven storey development comprising residential (Use Class C3), Hotel (Use Class C1) and associated commercial, business and service (Class E) use with associated works.

1.3 REPORT STRUCTURE

- 1.3.1. This report is set out in the following format:
- **Section 1: Introduction**
 - **Section 2: Waste Legislation, Policy and Guidance** – details of the national legislation and local waste policies that have relevance to the Proposed Development.
 - **Section 3: Management of Operational Waste – Residential** – provides an estimate of the residential waste arising and outlines the plan which will be adopted to manage the waste once operational.
 - **Section 4: Management of Operational Waste – Commercial** – provides an estimate of commercial waste arising and outlines the plan which will be adopted to manage the waste once operational.
 - **Section 5: Summary & Conclusions**
 - **Appendix A: National, London and Local Waste Policy & Guidance**
 - **Appendix B: Email Correspondence from Linda Hall-Brunton – Dated 14 July 2020**
 - **Appendix C: Email Correspondence from Linda Hall-Brunton – Dated 4 August 2020**

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. Under the UK-EU withdrawal agreement, a transition period will end on 31 December 2020 (unless extended), during which time the UK will be treated for most purposes as if it were still an EU Member State, and most EU law (including as amended or supplemented) will continue to apply to the UK. At the end of the transition period, it is likely that legislation will remain in force as part of UK law and be repealed or amended at the will of Parliament or the devolved parliaments / assembly.
- 2.1.4. This section summarises the national legislation that is relevant to the Proposed Development, much of which is influenced by the rWFD. national, London and local waste policy and guidance reviewed during the preparation of this Waste Management Strategy are listed below.

2.2 NATIONAL LEGISLATION

- 2.2.1. A list of relevant items of national waste legislation is outlines below in reverse chronological order:
- **Waste Management, The Duty of Care Code of Practice (2018 update)** - This code of practice replaces the 1996 Code and is pursuant to Section 34(9) of the Environmental Protection Act 1990. It sets out practical guidance on how to meet waste duty of care requirements and is admissible as evidence in legal proceedings i.e. its rules will be taken into account where relevant in any case based on breach of the duty of care.
 - **The Waste (England and Wales) Regulations 2011 (as amended)** – 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 brought in by the Environmental Protection Act 1990.

2.3 NATIONAL, LONDON & LOCAL WASTE POLICY

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

- Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework* (2019);
- MHCLG, *National Planning Policy for Waste* (2014);
- Department for Environment, Food and Rural Affairs (Defra), *Our Waste, Our Resources: A Strategy for England* (2018);
- HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment* (2018);
- Greater London Authority (GLA), *The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011* (2016);
- GLA, *Intend to Publish London Plan 2019* (2019);
- GLA, *London Environment Strategy* (2018);
- London Waste and Recycling Board (LWARB), *Waste Management Planning Advice for New Flatted Properties* (2014);
- The North London Waste Authority, *Joint Waste Strategy* (2009);
- London Borough of Camden (LBC), *Camden Local Plan* (2017);
- LBC, *Camden Planning Guidance Design* (2018); and
- LBC, *Waste storage and arrangements for residential and commercial units (Supporting document for planning guidance CPG1 DESIGN Storage and collection of recycling and waste)* (undated).

3 MANAGEMENT OF OPERATIONAL WASTE – RESIDENTIAL

3.1 INTRODUCTION

3.1.1. This chapter outlines the waste management strategy that will be adopted to manage the waste arisings from the residential dwellings within the Proposed Development once operational.

3.2 WASTE GENERATION MODEL

3.2.1. Based on email correspondence with LBC’s Waste Officer Linda Hall-Brunton (Principal Environmental Services Officer) at LBC on 14 July 2020, the estimated residential waste generation levels from the Proposed Development have been quantified using weekly waste generation metrics detailed in LBC’s guidance note *Camden Planning Guidance DESIGN dated November 2018*, hereafter referred to as ‘the Guidance’. A copy of the email correspondence is provided in **Appendix B**.

3.2.2. The waste generation metrics are summarised in **Table 3-1**.

Table 3-1 – LBC Weekly Residential Waste Generation Metrics

Waste Stream	Metric	Comment
Refuse	120 Litres per Dwelling	Maximum of Three Bedrooms per Dwelling ¹
Mixed Dry Recycling	140 Litres per Dwelling	
Food Waste	23 Litres per Dwelling	

3.2.3. **Table 3-2** summarises the total number of dwelling within the Proposed Development.

¹ For properties larger than 3 bedrooms, an additional 20 litres of refuse and mixed dry recycling should be added for each additional bedroom.

Table 3-2 – Accommodation Schedule

Use	Tenure Type	Dwellings (No.)
Residential	Social Rent	18
	Private	17
TOTAL		35 *
* Proposed accommodation mix: 12 No. 1 bed; 12 No. 2 beds; and 11 No. 3 beds		

3.2.4. **Table 3-3** summarises the assumed collection frequencies based on the Guidance.

Table 3-3 – Waste Collection Frequency

Waste Stream	Collection Frequency
Refuse	Weekly
Mixed Dry Recycling	
Food Waste	

Table 3-4 details the estimated waste arisings from the residential properties.

Table 3-4 – Estimated Waste Arising

Waste Stream	Estimated Weekly Waste Generation (Litres)		
	Social Rent	Private	Total
Refuse	2,160	2,040	4,200
Mixed Dry Recycling	2,520	2,380	4,900
Food Waste	414	391	805
Total	5,094	4,811	9,905

3.2.5. In addition to the waste streams detailed in **Table 3-4**, space will be provided for the following additional waste streams:

- Textiles;
- Waste Electrical and Electronic Equipment (WEEE); and
- Bulky waste.

3.3 PROPOSED RESIDENTIAL WASTE STRATEGY

- 3.3.1. The waste management strategy for the Proposed Development has been designed to provide a high quality of service to residents whilst also complying with the Guidance.
- 3.3.2. The residential waste management strategy has been split into the following sections:
- Individual Residential Properties (**Section 3.4**);
 - Proposed Waste Management Strategy (**Section 3.5**);
 - Waste Collection Process (**Section 3.6**); and
 - Bulky Waste (**Section 3.7**).

3.4 INDIVIDUAL RESIDENTIAL PROPERTIES

- 3.4.1. Each residential property will be provided with segregated waste containers/bins, typically in the kitchen area to allow residents to segregate their refuse, recyclables and food.
- 3.4.2. An example of a suitable segregated waste bin is shown in **Figure 3-1**.

Figure 3-1 - Example Segregated Bin²



- 3.4.3. The example bin unit provides the following storage capacity.
- Refuse: 35 Litres;
 - Mixed dry recycling: 35 Litres; and
 - Food waste: 21 Litres.

² Source: <https://www.hafele.co.uk/en/product/pull-out-waste-bin-vs-envi-space-xx-pro-bin-515-600mm-iva/50317304/?MasterSKU=0000002f0000ea0f00030023>

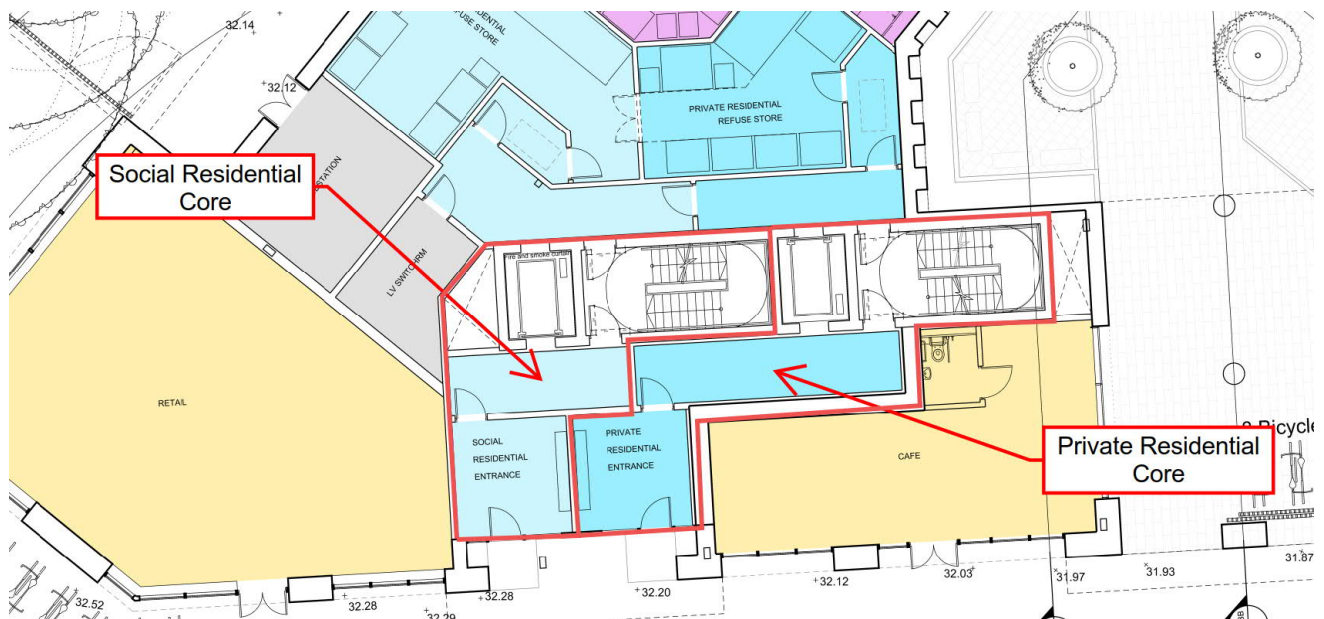
3.4.4. The residents will be responsible for cleaning these bins, and for regularly transporting the waste, dry mixed recyclables and food waste from these bins to their nominated communal waste storage area.

3.5 PROPOSED WASTE MANAGEMENT STRATEGY

3.5.1. The following section outlines the specific waste management strategy for the residential units within the Proposed Development.

3.5.2. The Proposed Development comprises two individual cores. The configuration of the cores is shown in **Figure 3-2** below.

Figure 3-2 - Residential Core Configuration



Source: Sheppard Robson – Drawing No. 6432-20-200

3.5.3. It is proposed that the cores serving the social rent and private properties will each be provided with a dedicated communal waste storage area at ground floor level. The waste storage areas will be the locations that all residential waste will be stored prior to collection.

3.5.4. Based on the estimated waste generation levels outlined in **Table 3-4**, **Table 3-5** details the number and types of bins that will be provided within each of the communal waste storage areas.

Table 3-5 – Bin Requirements

Waste Stream	Container	Number of Bins		
		Social Rent	Private	Total
Refuse	1,100 Litre Eurobin	2	2	4
Mixed Dry Recycling	1,280 Litre Eurobin	2	2	4
Food Waste	240 Litre Wheeled Bin	2	2	4

3.5.5. The dimensions of the proposed bins are summarised in **Table 3-6**.

Table 3-6 – Bin Dimensions

Container	Height (mm)	Width (mm)	Depth (mm)
1,100 Litre Eurobin	1,370	1,275	980
1,280 Litre Eurobin	1,430	1,265	985
240 Litre Wheeled Bin	1,070	580	730

3.5.6. In addition to the bins detailed in **Table 3-5**, **Table 3-7** details the space provided in each of the communal waste storage areas for textiles, WEEE and bulky waste.

Table 3-7 – Additional Waste Streams

Waste Stream	Area (m ²) *
Textiles	2
WEEE	2
Bulky Waste	5

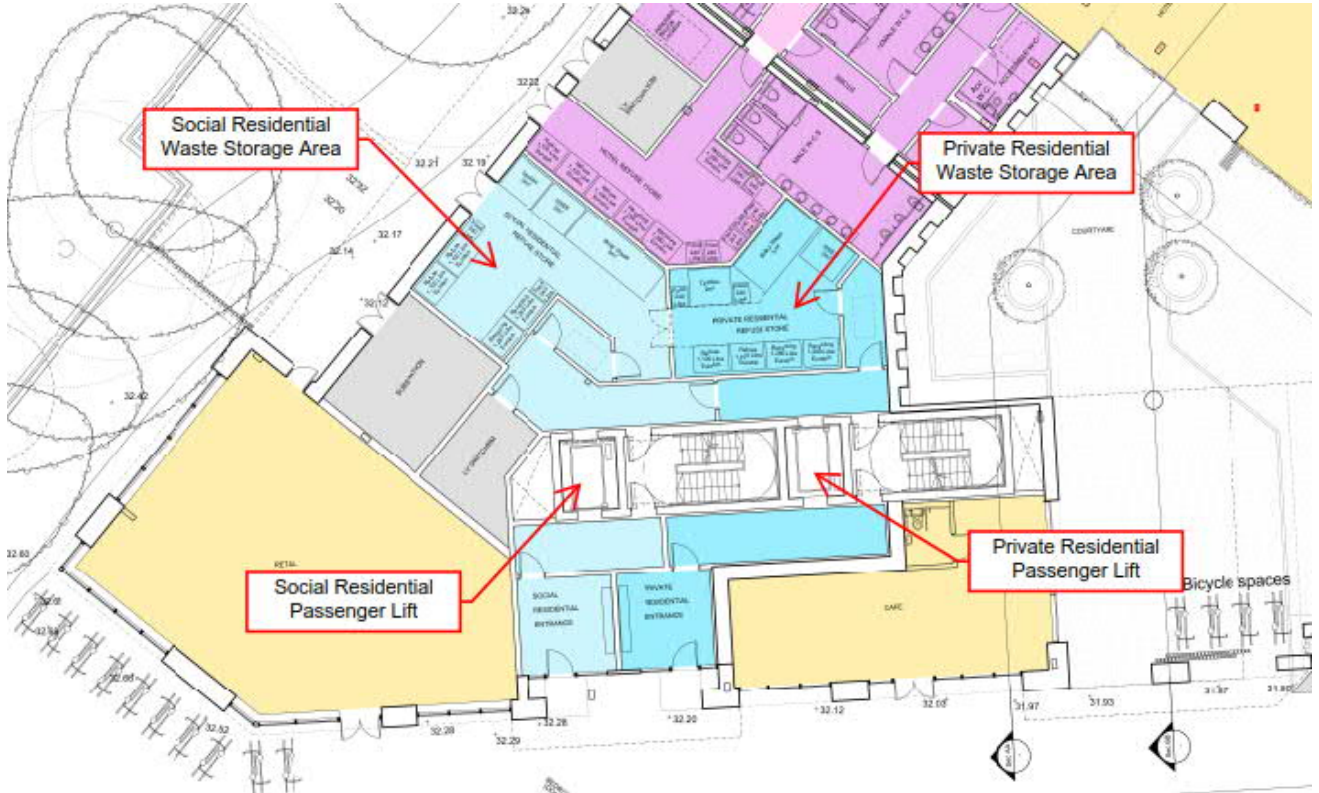
* Each area is assumed to have a nominal height of 1m.

3.5.7. Both of the communal waste storage areas (social rent and private tenure) will have sufficient space to accommodate the number of bins shown in **Table 3-5** and the areas for the storage of additional waste streams shown in **Table 3-7**.

3.5.8. Residents will be required to transport their own waste from their dwelling directly to their nominated communal waste storage area using the residential passenger lifts. Once within the communal waste storage area, the residents will be required to segregate their waste into the appropriately labelled bins.

3.5.9. The locations of the ground floor communal waste storage areas and passenger lifts are shown in **Figure 3-3**.

Figure 3-3 – Locations of the Communal Waste Storage Areas and Lifts



Source: Sheppard Robson – Drawing No. 6432-20-200

3.5.10. The communal waste storage areas will be designed to the specification detailed in BS5906:2005 *Waste management in buildings – Code of practice* (hereafter referred to as BS5906:2005). In summary, the storage areas will include the following:

- A suitable water point in close proximity to allow washing down;
- All surfaces sealed with a suitable wash proof finish (vinyl, tiles etc.);
- All surfaces easy to clean;
- Suitable floor drain connected to the foul sewer; and
- Suitable lighting and ventilation.

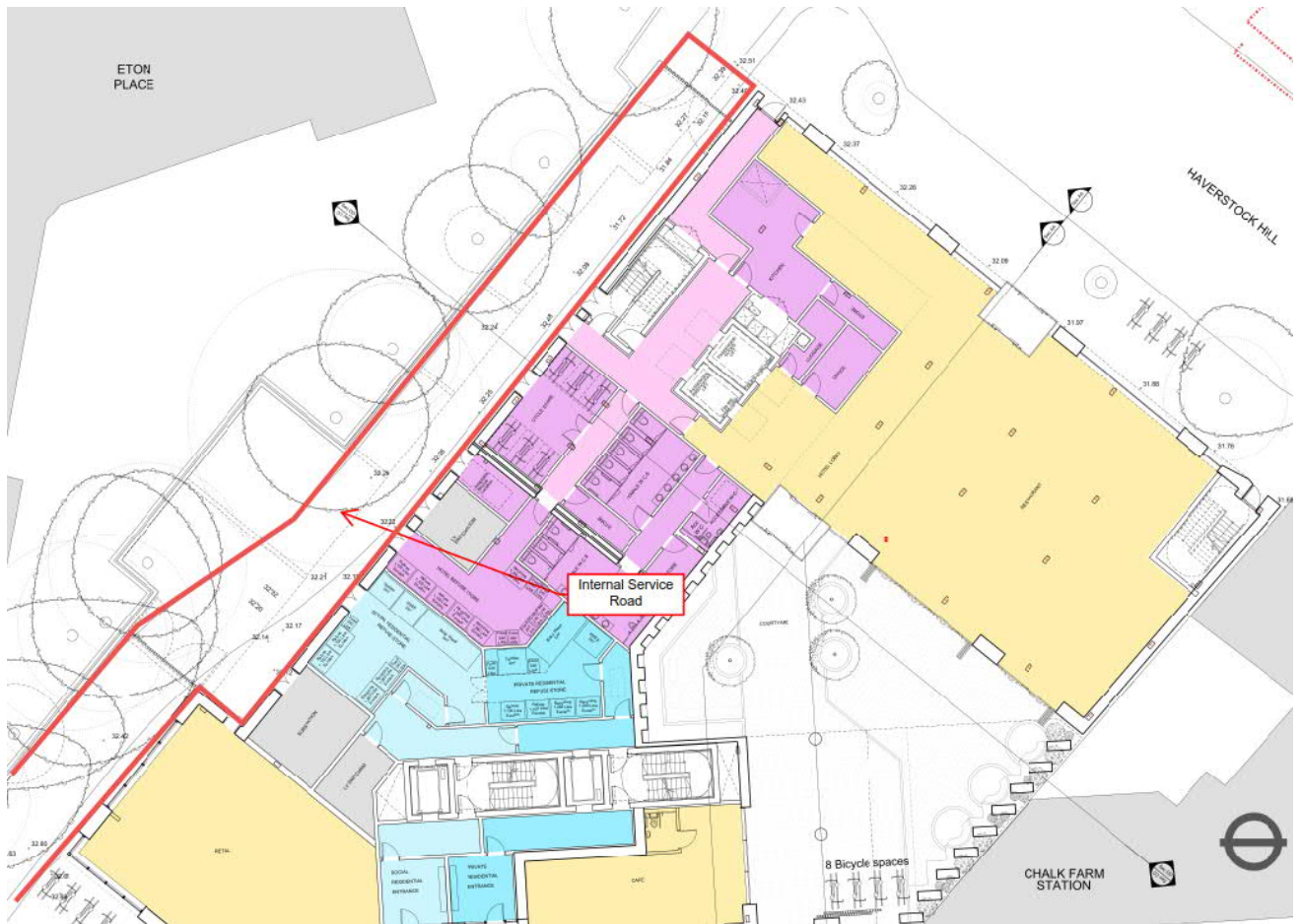
3.5.11. As required by the Guidance, all residential dwellings are located within 30m (excluding vertical distance) from the communal waste storage areas.

3.6 WASTE COLLECTION PROCESS

3.6.1. On the collection days nominated by LBC, the waste management contractor will access the site using the internal service road on the northern boundary of the site and will park their Refuse Collection Vehicle (RCV) adjacent to the external entrance door to the communal waste storage areas.

3.6.2. The location of the internal service road is shown in **Figure 3-4**.

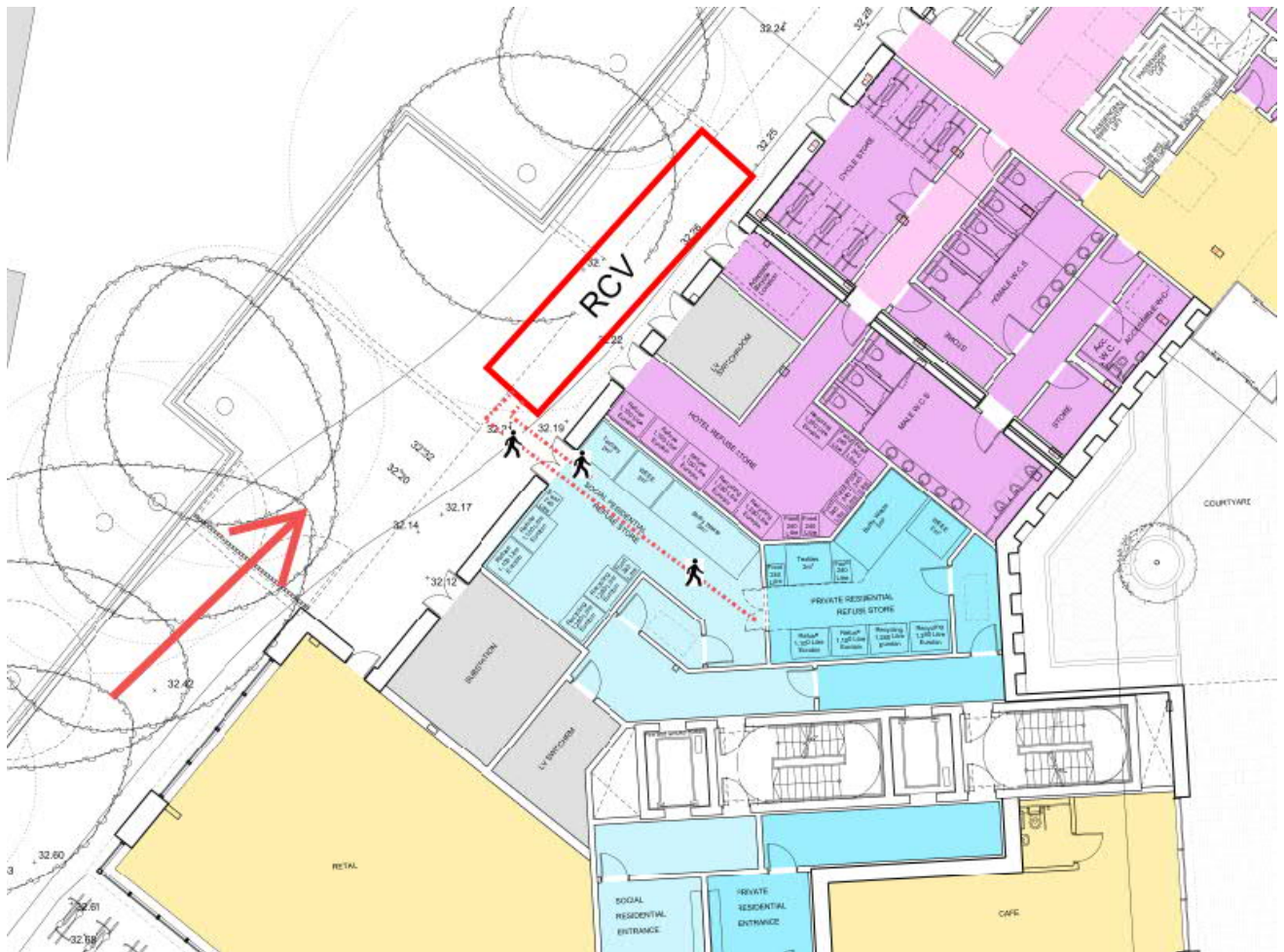
Figure 3-4 – Internal Service Road



Source: Sheppard Robson – Drawing No. 6432-20-200

- 3.6.3. The waste collection operatives will collect bins directly from the two communal waste storage areas and transport them to the RCV, returning them to the store once emptied.
- 3.6.4. Paths between the communal waste storage areas and RCV will be free from kerbs or steps, have a solid foundation and be suitably paved with a smooth and continuous finish.
- 3.6.5. The RCV parking location and collection crew access routes are shown in **Figure 3-5**.

Figure 3-5 - RCV Parking Location and Access Routes



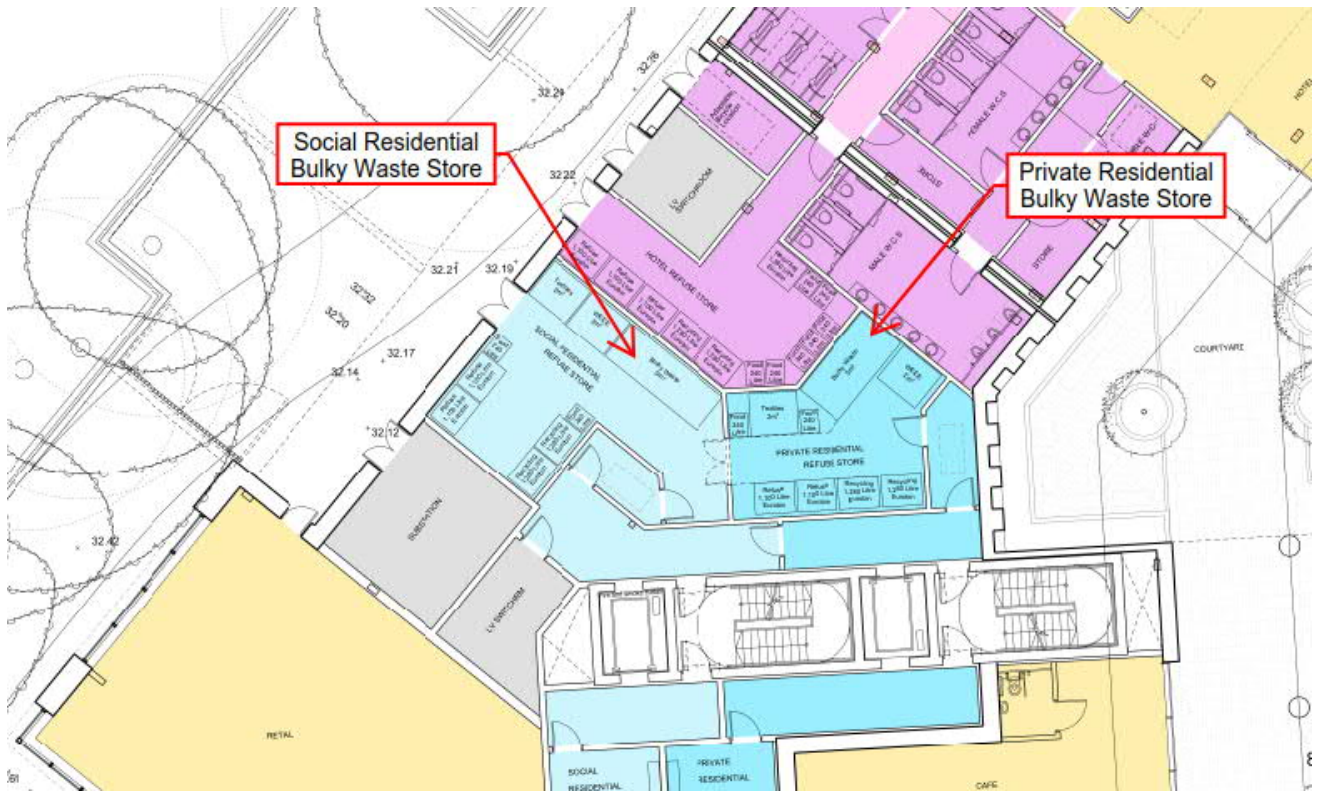
Source: Sheppard Robson – Drawing No. 6432-20-200

- 3.6.6. It should be noted that the RCV will park within the carriageway of the internal access road, temporarily blocking it whilst the bins are emptied.
- 3.6.7. It is anticipated that this will not cause any significant operational issue as the route is a lightly trafficked private service road dedicated to the Proposed Development, with a limited number of bins requiring collection at one time. Any potential delays caused during collection would therefore be minimal and extremely unlikely to impact the surrounding road network.

3.7 BULKY WASTE

- 3.7.1. A bulky waste storage area will be provided in each of the communal waste storage areas to service the residential units within the Proposed Development.
- 3.7.2. The locations of the bulky waste storage areas are shown in **Figure 3-6**.

Figure 3-6 – Bulky Waste Storage Area Location



Source: Sheppard Robson – Drawing No. 6432-20-200

- 3.7.3. When bulky waste arises, the on-site Facilities Management (FM) team will be responsible for managing these items and for ensuring that the storage area is well managed and maintained.
- 3.7.4. Residents will be required to demonstrate to the on-site FM team that they have paid the appropriate fee to LBC, before they are permitted to transport the waste from their property to the bulky waste storage area.
- 3.7.5. Once sufficient bulky waste items have been accumulated, the on-site FM team will arrange collection through LBC, a licensed waste management contractor, or a relevant local reuse charity.
- 3.7.6. The waste collection contractor will collect the bulky waste directly from the bulk waste storage areas.

4 MANAGEMENT OF OPERATIONAL WASTE – HOTEL INCLUDING FOOD & BEVERAGE/LOBBY AREA

4.1 INTRODUCTION

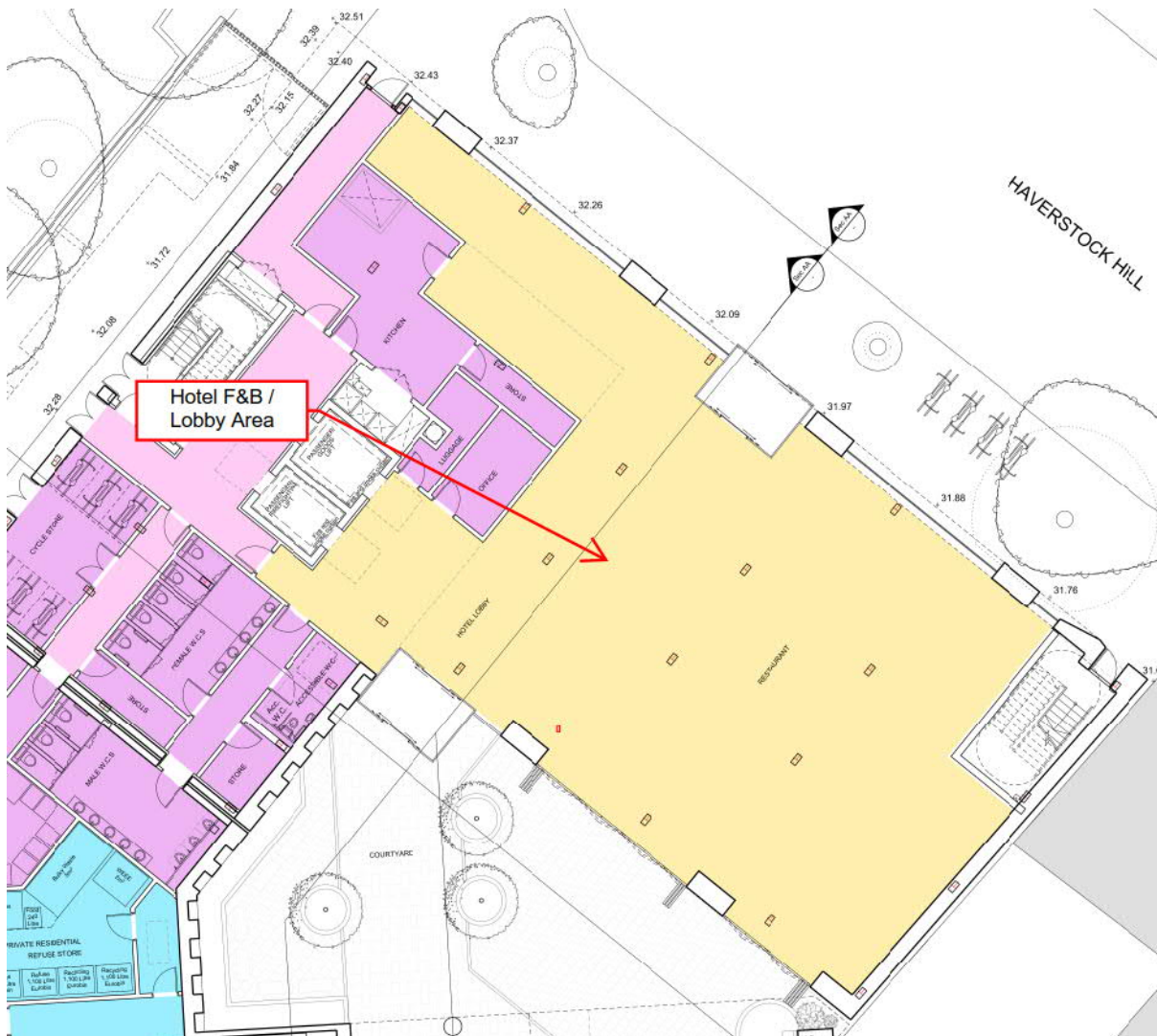
4.1.1. This section details the strategy which will be adopted to successfully manage the commercial waste arising from the hotel including the food and beverage (F&B)/lobby area within the Proposed Development.

4.2 WASTE GENERATION MODEL

4.2.1. The waste model has been prepared to estimate the likely waste generation levels from the hotel (operator not yet appointed), which is assumed to be 3 stars rated establishment and the F&B/lobby area at ground floor level.

4.2.2. **Figure 4-1** shows the location of the hotel and F&B/lobby area within the Proposed Development.

Figure 4-1 – Hotel and F&B/Lobby Locations



Source: Sheppard Robson – Drawing No. 6432-20-200

4.2.3. **Table 4-1** summarises the waste sources and number of hotel rooms (keys) and the area of the F&B/lobby.

Table 4-1 – Proposed Commercial Uses

Waste Source	Keys (No.)	Area (m ²)
Hotel	118	n/a
F&B/Lobby Area	n/a	376

4.2.4. The waste generation calculations for the hotel will be based on metrics provided by Linda Hall-Brunton (Principal Environmental Services Officer) at LBC in email correspondence dated 4 August 2020. A copy of the email correspondence is provided in **Appendix C**.

4.2.5. The waste generations calculations for the F&B/lobby area will be based on waste generation metrics sourced from BS5906:2005.

4.2.6. The waste generation metrics used to calculate the commercial waste arisings are detailed in **Table 4-2**.

Table 4-2 – Commercial Waste Metrics

Commercial Area	Waste Generation Metric (Weekly)		Source	Assumptions
Hotel	Per Room	40 Litres Refuse	LBC	N / A
		40 Litres Mixed Dry Recycling		
		20 Litres Food Waste		
F&B/Lobby	Volume per number of covers [75 litres]		BS5906:2005	One cover per 3m ² Waste Composition Refuse 40% Mixed Dry Recycling 40% Food Waste 20%

4.2.8. Based on the schedule detailed in **Table 4-1** and the waste generation metrics in **Table 4-2**, **Table 4-3** summarises the estimated waste arisings from the hotel and F&B/lobby area.

Table 4-3 – Estimated Waste Arisings (Weekly)

Commercial Area	Total (Litres / Week)	Refuse (Litres / Week)	Recycling (Litres / Week)	Food Waste (Litres / Week)
Hotel	11,800	4,720	4,720	2,360
F&B/Lobby	9,400	3,760	3,760	1,880
TOTAL	21,200	8,480	8,480	4,240

4.3 PROPOSED WASTE MANAGEMENT STRATEGY

- 4.3.1. A single communal waste storage area will be provided to service the hotel and F&B/lobby area detailed in **Table 4-1** and will be managed by the hotel operator.
- 4.3.2. Based on the estimated waste volumes outlined in **Table 4-3** and an assumed daily waste collection schedule, **Table 4-4** details the types and numbers of bins required in the communal waste storage area.

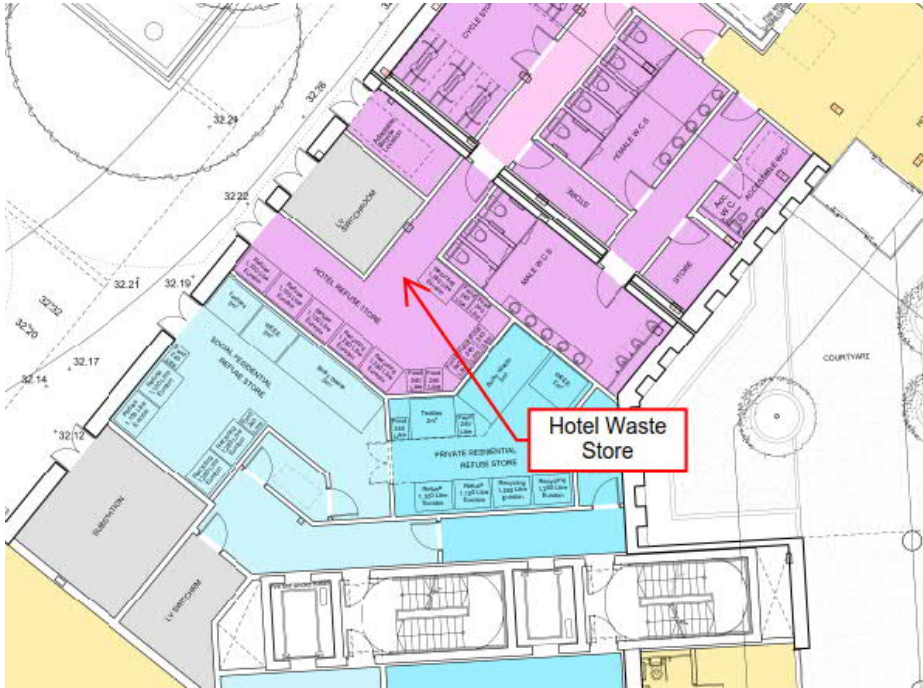
Table 4-4 – Bin Requirements

Waste Type	Collection Frequency	Volume (Litres / Day)	Container	Quantity (No.)
Refuse	Daily *	2,423	1,100 Litre Eurobin	3
Recycling		2,423	1,280 Litre Eurobin	2
Food Waste		1,211	240 Litre Wheeled Bin	5

* Assumes the provision of two days' waste storage capacity

- 4.3.3. Areas within the hotel and F&B/lobby area will be provided with suitable internal waste storage areas as part of the fit-out phase and should be designed to encourage employees to segregate their waste. The materials that are segregated and the method of storage within the internal waste storage areas will need to reflect the types of waste generated and should include food waste if generated in sufficient quantities.
- 4.3.4. At regular intervals the on-site FM team appointed by the hotel operator will transport the waste from the internal waste storage areas to the hotel's waste storage area at ground floor level. Once within the hotel's waste storage area the waste will be segregated into the labelled bin.
- 4.3.5. The location of the hotel's waste storage area is shown in **Figure 4-2**.

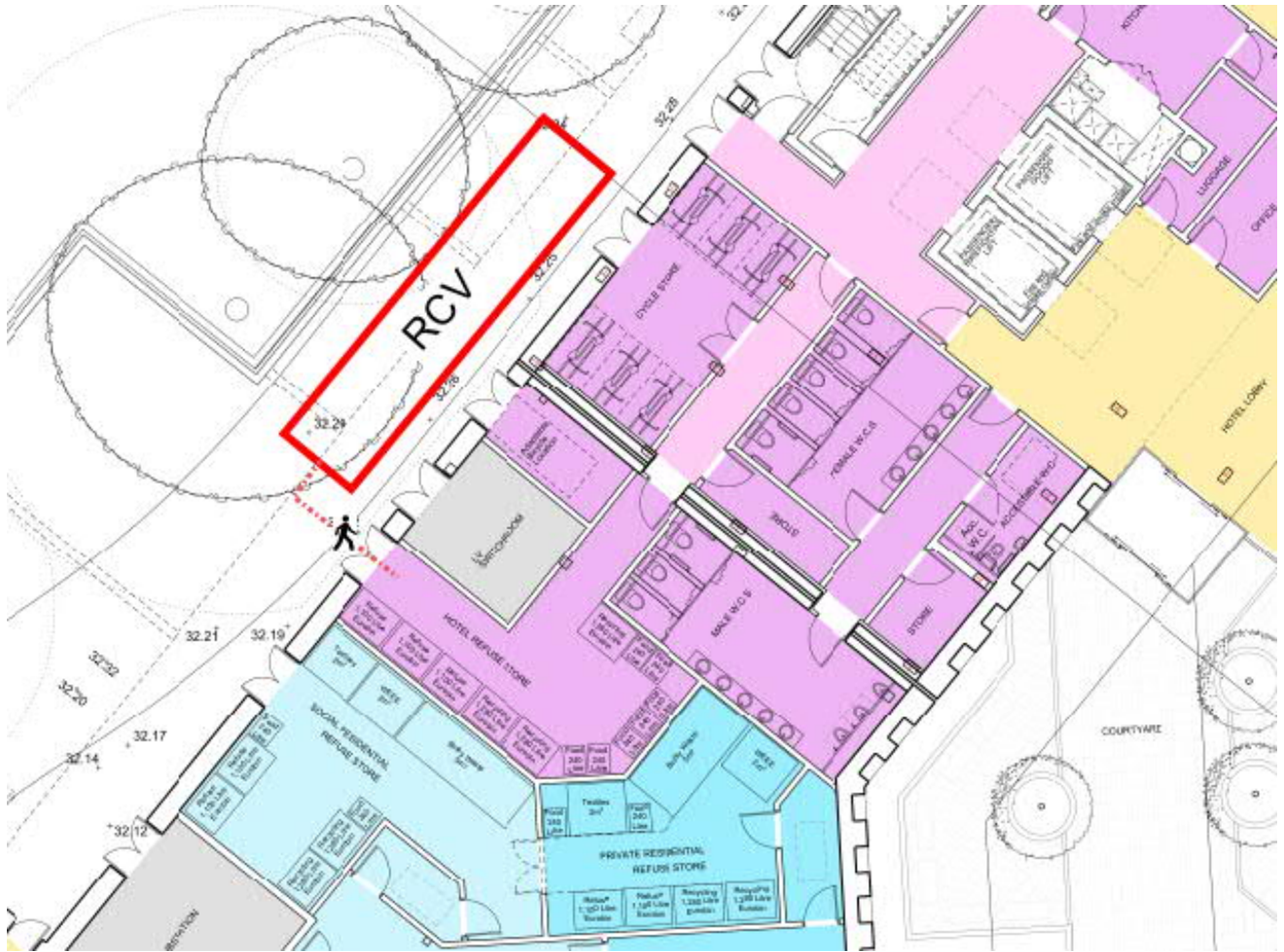
Figure 4-2 – Location of the Hotel’s Waste Storage Area



Source: Sheppard Robson – Drawing No. 6432-20-200

- 4.3.6. The hotel operator, or their FM team, will appoint a suitably licensed commercial waste management contractor to collect the waste.
- 4.3.7. On a daily basis, the appointed commercial waste management contractor will access the site using the internal service road on the northern boundary of the site (refer to **Figure 3-4**) and will park their RCV adjacent to the external entrance doors to the hotel’s waste storage area.
- 4.3.8. The waste collection operatives will collect bins directly from the hotel’s waste storage area and transport them to the RCV, returning them to the store once emptied.
- 4.3.9. Paths between the hotel’s waste storage area and RCV will be free from kerbs or steps, have a solid foundation and be suitably paved with a smooth and continuous finish.
- 4.3.10. The RCV parking location and collection crew access routes are shown in **Figure 4-3**.

Figure 4-3 - RCV Parking Location and Access Routes



Source: Sheppard Robson – Drawing No. 6432-20-200

- 4.3.11. It should be noted that the RCV will park within the carriageway of the internal access road temporarily blocking it whilst the bins are emptied.
- 4.3.12. It is anticipated that this will not cause any significant operational issue as the route is a lightly trafficked private service road dedicated to the Proposed Development, with a limited number of bins requiring collection at one time. Any potential delays caused during collection would therefore be minimal and extremely unlikely to impact the surrounding road network.
- 4.3.13. In addition to the waste storage facilities detailed in **Table 4-4** the hotel operator will provide suitably designed storage within their tenanted area for any hazardous waste that they may generate. The hotel operator will be responsible for arranging disposal of these hazardous wastes as they arise.

5 MANAGEMENT OF OPERATIONAL WASTE – RETAIL UNITS

5.1 INTRODUCTION

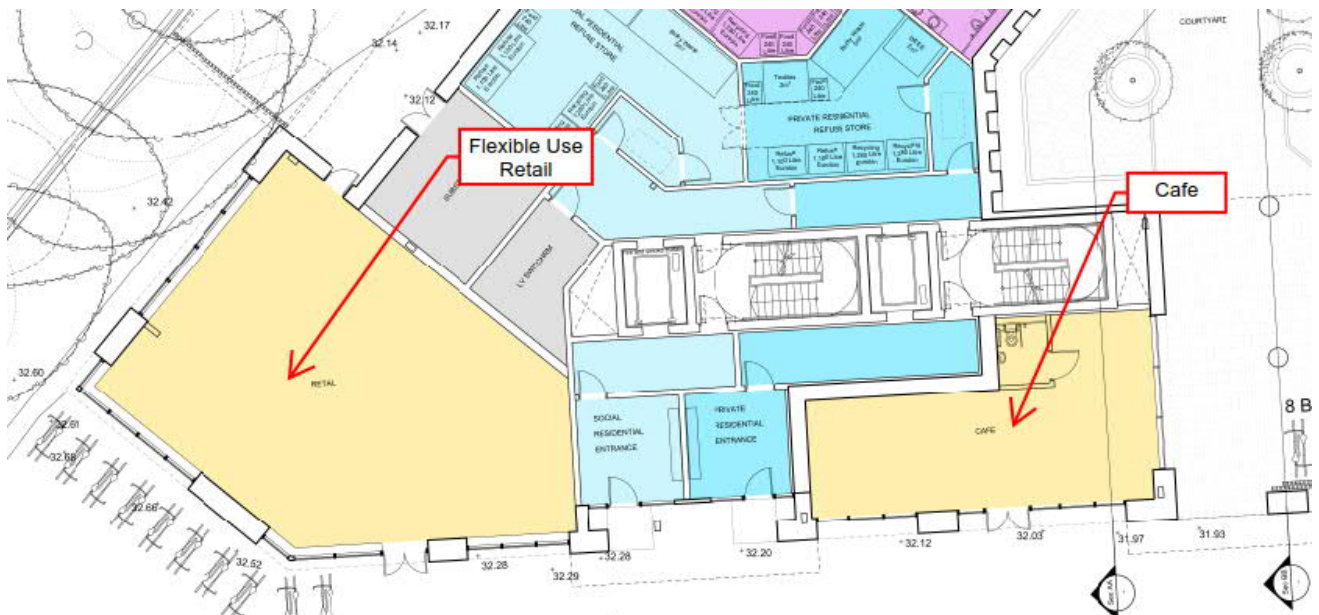
5.1.1. This section outlines the strategy which will be adopted to successfully manage waste arising from the retail units within the Proposed Development once operational.

5.2 WASTE GENERATION MODEL

5.2.1. The Proposed Development includes two retail units at ground floor level, with the café unit also having space at upper ground floor level.

5.2.2. **Figure 5-1** shows the location of the retail units at ground floor level.

Figure 5-1 - Retail Unit Locations



Source: Sheppard Robson – Drawing No. 6432-20-200

5.2.3. **Table 5-1** summarises the proposed use classes and space provision.

Table 5-1 – Retail Use Classes and Space Provision

Unit	Commercial Use Classification	Area (GIA) (m ²)
1	Flexible Use (Class A1-A3)	134
2	Café (Class E)	137
TOTAL		271

5.3 PROPOSED WASTE MANAGEMENT STRATEGY

- 5.3.1. It is proposed that each of the individual retail tenants will, as part of their fit-out, provide a suitably sized waste storage area within their tenanted areas for the storage of refuse, recyclables and if appropriate food waste.
- 5.3.2. The size of the waste storage areas will be based on the likely waste generation levels from each of the retail units taking consideration of the business activities taking place and the assumed waste collection frequency.
- 5.3.3. The size and location of the waste store will have to comply with the applicable guidance, as well as all the usual statutory obligations.
- 5.3.4. To ensure that adequate waste facilities are provided, specific contractual provisions will be made within the tenancy agreements for the retail units.
- 5.3.5. The individual tenants will be responsible for appointing a suitably licenced commercial waste management contractor, who will be required to collect the waste directly from the waste store within each tenants' premises. Tenants will not be permitted to present waste for collection outside of their premises.

6 SUMMARY AND CONCLUSIONS

6.1 SUMMARY

RESIDENTIAL WASTE

- 6.1.1. Each residential dwelling will incorporate a segregated under counter waste bin to allow refuse, recyclables to food to be sorted and store prior to disposal.
- 6.1.2. At regular intervals, residents will transport their waste from their property directly to their nominated communal waste storage area at ground floor level, where they will segregate refuse, dry mixed recyclables and food waste into the labelled bins.
- 6.1.3. The communal waste storage areas will be the location that all residential waste is stored prior to collection.
- 6.1.4. As required by the Guidance, the residential waste will be collected on a weekly basis by LBC's appointed waste management contractor.
- 6.1.5. The LBC waste collection contractor will park their RCV in the service road adjacent to the communal waste storage areas and will collect the bins directly from the stores. Once the bins have been emptied the waste collection contractor will return them to the stores.

BULKY WASTE

- 6.1.6. A bulky waste store will be provided in both communal waste storage areas at ground floor level.
- 6.1.7. Residents will be required to demonstrate to the on-site FM team that they have paid the appropriate fee to LBC prior to permitted to place the bulky into the storage area.
- 6.1.8. Once sufficient bulky waste has been collected, the on-site FM team will arrange a suitable collection time with LBC, a commercial waste contractor or a local reuse charity.
- 6.1.9. Bulky waste will be collected directly from the bulky waste store.

HOTEL AND F&B/LOBBY WASTES

- 6.1.10. A single waste storage area will be provided to service the hotel and F&B/lobby area.
- 6.1.11. At regular intervals, the staff or the appointed FM team will transport the waste generated by the hotel and the F&B/lobby area to the waste storage area, where they will segregate refuse, dry mixed recyclables and food waste into the labelled bins.
- 6.1.12. The hotel and F&B/lobby wastes will be collected on a daily basis by a commercial waste management contractor appointed by the hotel operator's FM team.
- 6.1.13. The commercial waste management contractor will park their RCV in the service road adjacent to the commercial waste store and will collect the bins directly from the store. Once the bins have been emptied the waste collection contractor will return them the store.

RETAIL UNITS

- 6.1.14. Waste generated within the two retail units will be managed by the individual tenants who will be required to provide a suitable waste storage within their demise.



- 6.1.15. The individual waste stores should be adequately sized to allow refuse, recyclables and if appropriate food waste to be segregated and should have sufficient capacity to store waste based on the collection frequencies agreed with their commercial waste contractors.
- 6.1.16. The individual tenants will be responsible for appointing a licenced commercial waste management contractor, who will be required to collect the waste directly from the waste store within the tenants' premises. Tenants will not be permitted to present waste outside of their premises.

6.2 CONCLUSION

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

Appendix A

NATIONAL, LONDON AND LOCAL
WASTE POLICY & GUIDANCE





NATIONAL WASTE POLICY

National Planning Policy Framework (2019)³

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

The following extracts are of relevance to the Proposed Development:

"2. Achieving sustainable development

...

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

...

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

National Planning Policy for Waste (2014)⁴

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)⁵

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.

³ Ministry of Housing, Communities and Local Government (MHCLG) (2019) *National Planning Policy Framework* [\[Link\]](#)

⁴ MHCLG (2014) *National Planning Policy for Waste* [\[Link\]](#)

⁵ Department for Environment, Food and Rural Affairs (Defra) (2018) *Our Waste, Our Resources: A Strategy for England* [\[Link\]](#)

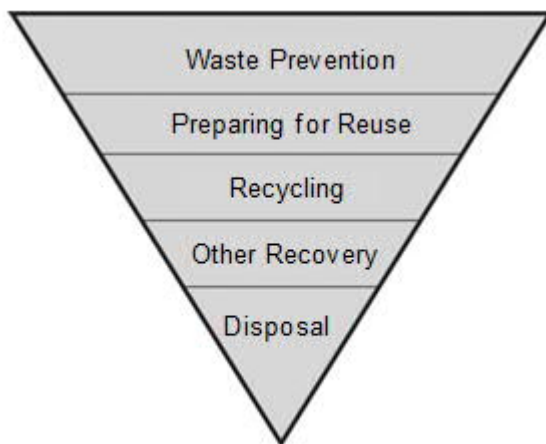
It combines actions the country will take now, with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. This is the blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity,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

Waste Hierarchy

The Waste Hierarchy requires avoidance of waste in the first instance followed by reducing the volume that requires disposal after it has been generated.

It gives an order of preference for waste management options to minimise the volume for disposal, as shown in **Figure A1.1**.

Figure A1.1: The Waste Hierarchy



Source: Waste Framework Directive

The main principles of the Waste Hierarchy are:

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

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

LONDON WASTE POLICY & GUIDANCE

The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)⁶

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

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

Policy 5.16 Waste net self-sufficiency

- A. *The Mayor will work with London boroughs and waste authorities, the London Waste and Recycling Board (LWaRB), the Environment Agency, the private sector, voluntary and community sector groups, and neighbouring regions and authorities to:*
 - a. *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;*
 - b. *create positive environmental and economic impacts from waste processing, and*
 - c. *work towards zero biodegradable or recyclable waste to landfill by 2031.*
- B. *This will be achieved by:*
 - a. *minimising waste;*
 - b. *encouraging the reuse of and reduction in the use of materials;*
 - c. *exceeding recycling/composting levels in local authority collection waste (LACW) of 45 per cent by 2015, 50 per cent by 2020 and aspiring to achieve 60 per cent by 2013;*
 - d. *exceeding recycling/composting levels in commercial and industrial waste of 70% by 2020;*
 - e. *exceeding recycling and reuse levels in construction, excavation and demolition (CE&D) waste of 95 per cent by 2020;*
 - f. *improving London's net self-sufficiency through reducing the proportion of waste exported from the capital over time, and*
 - g. *working with neighbouring regional and district authorities to co-ordinate strategic waste management across the greater south-east of England.'*

Intend to Publish London Plan 2019 (December 2019)⁷

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

⁶ GLA (2016) *The London Plan The Spatial Development Strategy for London Consolidated with Alterations Since 2011* https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf

⁷ GLA (2019) *Draft London Plan – Consolidated Changes Version* [\[Link\]](#)

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

'Policy D6: Housing quality and standards

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

...

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

...

Usability and ongoing maintenance

The development should ensure that:

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

'Policy SI 7 Reducing waste and supporting the circular economy

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

- 4) *adequate and easily accessible storage space and collection systems to support recycling and reuse*
- 5) *how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy*
- 6) *how performance will be monitored and reported.'*

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

...

D. Development proposals for materials and waste management sites are encouraged where they:

- 1) *deliver a range of complementary waste management and secondary material processing facilities on a single site*
- 2) *support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets*
- 3) *contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste'*

London Environment Strategy⁸

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.

⁸ Greater London Authority (GLA) (2018) *London Environment Strategy* [\[Link\]](#)



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).'

LWARB, Waste Management Planning Advice for New Flatted Properties – Project Report⁹

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

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

'6.3 Implementation

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

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

LOCAL WASTE POLICY AND GUIDANCE

The North London Joint Waste Strategy (2009)¹⁰

The North London Joint Waste Strategy is a 16 year strategy for managing the waste which is produced in North London and collected by seven local councils, including Camden.

The strategy outlines how the seven councils plan to manage approximately one million tonnes of waste generated residents and some, mainly small businesses.

The strategy sets out why a 16 year strategy is needed for waste management, the legal requirements relating to waste, the options available for managing waste, how to deal with 'other' wastes not included within the plan and how the best option for managing waste in North London can be determined and implemented.

The strategy aims to:

- *To promote and implement sustainable municipal wastes management policies in North London*
- *To minimise the overall environmental impacts of waste management*
- *To engage residents, community groups, local businesses and other interested parties in the development and implementation of the above policies*
- *To provide customer focused, best value services*

The strategies objectives are:

⁹ London Waste and Recycling Board (LWARB) (2014) *Waste Management Planning Advice for New Flatted Properties – Project Report* [\[Link\]](#)

¹⁰ London Borough of Camden (2009) *The North London Joint Waste Strategy* [\[Link\]](#)

- *To minimise the amount of municipal waste 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 ensure an equitable distribution of costs, so that those who produce or manage the waste pay for it*

Camden Local Plan (2017)¹¹

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 2031;*
- 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.*

¹¹ London Borough of Camden (2017) *Camden Local Plan* [\[Link\]](#)



Camden Planning Guidance Design (2019)

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.

Waste storage and arrangements for residential 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.

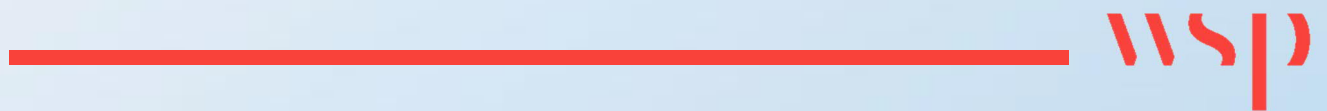
Planning for all waste and storage should ensure that;

- *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)* [\[Link\]](#)

Appendix B

EMAIL CORRESPONDENCE FROM
LINDA HALL-BRUNTON - DATED 14
JULY 2020



Venn, Matthew

From: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>
Sent: 14 July 2020 16:35
To: Venn, Matthew
Cc: Smith, Ben; Fletcher2, Richard; Cardno, Steve
Subject: RE: Technical guidance 2018
Attachments: Camden RCV Tech Drawings - March 2018.pdf

Hi Matthew

We have also picked up on the discrepancies in the truck information. I emailed Veolia some time ago and now have the technical specification updated which you can work to, I was unable to open their recently sent links, but I believe they will reply with an updated PDF tomorrow, attached is an older version from 2018 as an example only. The newer 2020 specification will all be updated into the newer guidance to be republished shortly.

We already advise that the following is adequately designed in, road surfacing suitably laden for weight of vehicle and drainage in place, street lighting, overhang trees maintained and away from the loading point, winter maintenance in place, key holder / reception reporting for access shared, level area of hard standing for loading activity. No overhead structures, cabling or height barriers. Any change in level needs to be addressed, we require a drop kerb or ramp installed if there is any requirement to move bins down a one riser step or more (or equivalent).

For residential units follow 2018 guidance and describe the method for internal storage and transfer. There is a 30M horizontal distance for the public to carry their own waste to a central store.

Regarding the hotel /café areas please, set out the method of transfer from the rooms to the bin storage area and include the internal layout for bins. For the hotel / café spaces, please base this on the user's / visitors /covers expected weekly and not BS 5906 or other older guidance. If there is no food consumption or minibar's allowed in the rooms we do not require food to be segregated out from these so mixed recycling and general waste is fine.

Each room is assumed to have 10-20L of general and 10-20L of recyclables per week, you can apply an expected occupancy ratio i.e. 80% . A sack is 65 litres, this equates into the size in litres of the bins in your storage area. Some hotels are fine with separating glass/ cardboard from other dry comingled, but check your providers schematic. All flimsy plastic aside from plastic bags is not accepted only rigid plastic types in accordance with our published acceptance criteria, this and contaminated items is general waste. If you do use tugs or powered equipment for internal transfer indicate schematic, storage and charging points for these.

Most similar schemes have site staff collect the two streams in sacks(recycling / general waste) and take these to a bin store for bulking separately. If you choose to segregate the waste types in the bin store and not the rooms, you will need to adhere to Environment Agency published guidance for this operational activity for staff sorting and bulking under issued licencing. We welcome any modifications to help deliver high quality recycling to reduce the volume of presented waste and lower the total number of final servicing trips (options listed in the tech guidance).

Please ensure you have considered wash-down cleansing, litter capture and wind transported fly litter for any outdoor or communal spaces that exist between adjacent private and public land designated for commercial café/ leisure use.

I look forward to reviewing your waste strategy document or equivalent soon. Book in on a Tuesday 11-1pm.

Kind Regards

Linda Hall-Brunton
Principal Environmental Services Officer

Telephone: +442079742292



The majority of Council staff are now working at home through remote, secure access to our systems.

Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: Venn, Matthew <Matthew.Venn@wsp.com>
Sent: 14 July 2020 11:59
To: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>
Cc: Smith, Ben <Ben.J.Smith@wsp.com>
Subject: RE: Technical guidance 2018

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Hello Linda,

Sorry to chase but could you please respond to the questions in my email?

Thanks,

Matthew Venn BSc (Hons)
Waste and Resource Management
Associate Director



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wsp.com

Appendix C

EMAIL CORRESPONDENCE FROM
LINDA HALL-BRUNTON - DATED 4
AUGUST 2020



Venn, Matthew

From: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>
Sent: 04 August 2020 10:12
To: Venn, Matthew
Subject: RE: Technical guidance 2018

Hi Matthew

I am happy with your figures, you may not require the extra 10L for recycling given your below suggested, but it can do no harm to include it. Please consider any requirement to adapt to extra capacity if needed and set this out within your strategy document.

Kind Regards

Linda Hall-Brunton
Principal Environmental Services Officer

Telephone: +442079742292



The majority of Council staff are now working at home through remote, secure access to our systems.

Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: Venn, Matthew <Matthew.Venn@wsp.com>
Sent: 04 August 2020 09:07
To: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>
Subject: RE: Technical guidance 2018

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Morning Linda, thanks for the additional information.

We currently do not have a hotel operator appointed for the scheme so we don't know how the site will be operated. However, the expectation is that it will be a 3 star rated hotel so all food will be served on reusable crockery and cutlery.

I am also working on the assumption that food waste will be separated as legislation mandates that businesses separate this waste stream. Also I believe that the bins required for separate food waste will require more space than placing the food waste into the general waste stream.

I have worked through your suggested metrics and I think you are suggesting a weekly hotel metric of 40 litres of general waste; 40 litres of recycling; and 20 litres of food waste – please see the table below.

Waste Metric per Hotel Room per Week

General Waste	Recycling	Food	Description
40			General Waste from Rooms
	30		Recycling from Rooms
20			Additional allowance for food waste
	10		Additional allowance for recycling for dry comingled or packaging
-20		20	Separation of food waste
40	40	20	TOTAL

Could you please confirm that this is correct?

With regards to macerators, we are not proposing to provide them, as from discussions with Water UK and the water companies they are very opposed to them due to the additional load and the increased incidence of blockages. They are looking for the them to be banned in England to align with Scotland and who have already banned them, and with Wales who are currently also reviewing the policies.

Many thanks,

Matthew Venn *BSc (Hons)*
Waste and Resource Management
Associate Director



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6 Devonshire Square, London, EC2M 4YE

wsp.com

Mob: +44(0) 7920 250599

Fax: +44(0) 207 337 1701

From: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>

Sent: 03 August 2020 17:12

To: Venn, Matthew <Matthew.Venn@wsp.com>

Subject: RE: Technical guidance 2018

Hi Matthew

Reponses inline. Thanks for pointing out the differences in the metrics, further clarification provided below.

Kind Regards

Linda Hall-Brunton
Principal Environmental Services Officer

Telephone: +442079742292



The majority of Council staff are now working at home through remote, secure access to our systems.

Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: Venn, Matthew <Matthew.Venn@wsp.com>
Sent: 03 August 2020 15:58
To: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>
Cc: Smith, Ben <Ben.J.Smith@wsp.com>; Fletcher2, Richard <richard.fletcher2@veolia.com>; Cardno, Steve <Steve.Cardno@camden.gov.uk>; Matthew Allen <Matthew.Allen@sheppardrobson.com>
Subject: RE: Technical guidance 2018

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Hi Linda, I am just following up on my email below.

It would be great to receive your confirmation/comments as they are quite key to us progressing the scheme.

Many thanks,

Matthew Venn *BSc (Hons)*
Waste and Resource Management
Associate Director



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6 Devonshire Square, London, EC2M 4YE

wsp.com

Mob: +44(0) 7920 250599
Fax: +44(0) 207 337 1701

From: Venn, Matthew
Sent: 20 July 2020 11:52

To: Hall-Brunton, Linda <Linda.Hall-Brunton@camden.gov.uk>

Cc: Smith, Ben <Ben.J.Smith@wsp.com>; Fletcher2, Richard <richard.fletcher2@veolia.com>; Cardno, Steve <Steve.Cardno@camden.gov.uk>

Subject: RE: Technical guidance 2018

Good morning Linda, thanks for your detailed response.

Vehicles Specification

With regards to the vehicle I note that the 2018 example is 3.69m high which would imply that a clear head clearance of 4.5m would be sufficient to allow the vehicle to enter the site and to pick up the bins. Please note that one of the waste stores will require the bins to be collected from beneath an undercroft/building overhang. – You will need to set out the distances and if the head height requires foot transfer further than 10M to the vehicle, on site resource will need to present these bins to the vehicle. You may wish to deploy loading equipment to support any transfer arrangement that exceed 10 metres to meet current guidance for operational bin transfer.

Is this approach acceptable to LBC? If it meets the supplementary technical specification information provided it will be acceptable. We will send your proposal to review to Veolia to approve as a final draft.

Also could you please send me the 2020 specification when you receive it so that we can validate the above assumptions. – the guidance will not be ready promptly please use the 2018 guidance and further technical specification from Veolia.

Waste Model

I have also prepared waste models for both the residential and commercial areas. I have attached the waste models and I would appreciate your confirmation that I have interpreted your requirements correctly.

The residential waste model is based on the metrics provided in your 2018 guidance (as instructed in your email), plus additional space for textiles and WEEE wastes.

I have calculated the commercial waste model based on two scenarios:

- Scenario 1 (BS5906 metrics)
 - Hotel – 250 litre per bedroom per week (BS5906:2005 for a 2/3 star hotel which includes food)
 - As the restaurant and bar will also allow public access, an extra over allowance of 50% of the BS5906 restaurant metric has been added to allow for the additional footfall.
- Scenario 2 (Camden metrics)
 - Hotel – 20 litre of refuse and 20 litres of recycling (LHB email dated 14th July 2020) This excluded any food and drink element within the rooms. Please consider the arrangement for food, mini-bar or full service 3 meals per day + mini bar, no mini-bar? The food waste produced would be added to the 'refuse' unless you have an opportunity to segregate it into recycling using internal caddy collections (unlikely but feasible)?
 - My own calculations would assume a mean 40L general waste and 30L recycling. I would add 20L to the 'general waste' for food residues and 10L to the 'recycling' for dry comingled or packaging. I am happy to reinterpret the system your occupant tenancy will deliver, i.e. is it silver service with reusable ceramics or single use disposable packaging presented with food? With a food caddy in situ it is the reverse as the food presented would become recycling volume. 20L general and 50L recycling split out as 20L food and 30L mixed recycling . We assume you have no intention to supply a sink macerator.
 - Restaurant and bar – 75 litres per cover (source BS5906:2005)

In both scenarios, to make allowance for food waste from the hotel, it has been assumed that the total waste generated will be split 50%/50% between refuse and recycling, plus an additional 20% for food waste – equates to 120%. Waste from the restaurant and bar has been split refuse – 40%; recycling – 30%; and food waste 30%.

It is important to note that the two scenarios generate very different results with the Camden volumes being approximately half of the waste volumes calculated using BS5906 metrics. Could you please confirm your preference?

Camden's metrics supersede that of BS5906, but we require under the CPG S8 that the systems of operation for generated waste are calculated as set out under your tenancy arrangements where the tenant is known if not by the activities permitted under the business class. There must be a built design and space allocated to meet any future changes, this future proofing includes any future business change activity that could operate under the business class licence issued. This means you are required to consider any future adaptations that might require additional waste storage at this point.

I look forward to hearing from you soon.

Best regards,

Matthew

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Sent: 14 July 2020 16:35

To: Venn, Matthew <Matthew.Venn@wsp.com>

Cc: Smith, Ben <Ben.J.Smith@wsp.com>; Fletcher2, Richard <richard.fletcher2@veolia.com>; Cardno, Steve <Steve.Cardno@camden.gov.uk>

Subject: RE: Technical guidance 2018

Hi Matthew

We have also picked up on the discrepancies in the truck information. I emailed Veolia some time ago and now have the technical specification updated which you can work to, I was unable to open their recently sent links, but I believe they will reply with an updated PDF tomorrow, attached is an older version from 2018 as an example only. The newer 2020 specification will all be updated into the newer guidance to be republished shortly.

We already advise that the following is adequately designed in, road surfacing suitably laden for weight of vehicle and drainage in place, street lighting, overhang trees maintained and away from the loading point, winter maintenance in place, key holder / reception reporting for access shared,



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