



Uchaux Ltd

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# REGENTS PARK ROAD HOTEL

Waste Management Strategy (Update)





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## Waste Management Strategy (Update)

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# 1 INTRODUCTION

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## 1.1 PROJECT BACKGROUND

- 1.1.1. WSP has been commissioned by Uchaux Ltd to prepare a Waste Management Strategy for the Regents Park Road Hotel scheme (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. Redevelopment to provide a part ground plus 6-storey building and part ground plus 3-storey building comprising a hotel with associated works.

## 1.3 SITE DESCRIPTION

- 1.3.1. The existing site comprises a four-storey building on the corner of Regents Park Road and Haverstock Hill. The building fronts Haverstock Hill and is set back from the main road by an area of public realm. The site comprises a mix of uses including retail at ground floor with office accommodation at first and second floor and a single residential unit on the top floor.

## 1.4 REPORT STRUCTURE

- 1.4.1. 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 policy that have relevance to the Proposed Development.
  - **Section 3: Management of Hotel Waste** – provides an estimate of hotel waste arising and outlines the plan which will be adopted to manage the waste arising once operational.
  - **Section 4: Summary & Conclusions**
  - **Appendix A: National, London and Local Waste Policy & Guidance**

## 2 WASTE LEGISLATION, POLICY & GUIDANCE

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### 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 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:
  - **Waste Management, The Duty of Care Code of Practice (2018 update)** - This code of practices 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)** - Waste collection authorities must collect waste paper, metal, plastic and glass separately. It also imposes a duty on waste collection authorities, from the date, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
  - **Environment 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, 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, *London Environment Strategy* (2018);
- GLA, *Publication London Plan* (December 2020);
- London Borough of Camden (LBC), *Camden Local Plan* (2017); and
- LBC, *Camden Planning Guidance | Design |*: CPG1 (2018).

### 3 MANAGEMENT OF HOTEL WASTE

#### 3.1 INTRODUCTION

- 3.1.1. This section details the strategy which will be adopted to manage the hotel waste arising from the Proposed Development once operational.

#### 3.2 WASTE GENERATION MODELLING

- 3.2.1. LBC do not provide specific waste generation metrics for commercial spaces and therefore metrics have been sourced from *British Standard BS5906:2005 Waste management in buildings – Code of practice*. The relevant weekly waste generation metric is summarised below:

- 2/3 Star Hotel – Volume per bedroom [250 litres] x number of bedrooms

- 3.2.2. It should be noted that this metric has been selected to reflect the fact that whilst the proposed hotel will be finished to a 4-star standard, it will only have a small catering provision rather than a full restaurant.

- 3.2.3. **Table 3-1** summarises the estimated weekly waste arising from the hotel.

**Table 3-1: Estimate Weekly Waste Arising**

Source	Rooms (No.)	Waste Metric (Litres / Bedroom)	Estimated Waste Generation (Litres / Week)		
Hotel	59	250	14,750		
			Refuse*	Recycling*	Food Waste
			8,113	5,163	1,475

\* Assumes 55 / 35 / 10 split between refuse, recycling and food waste

#### 3.3 PROPOSED HOTEL WASTE MANAGEMENT STRATEGY

- 3.3.1. It is proposed that a waste storage area will be provided for the hotel at ground floor level. This will be the location that all refuse and recycling generated within the hotel will be stored prior to collection.
- 3.3.2. Based on the estimated waste volumes outlined in **Table 3-1**, **Table 3-2** outlines the number and types of bins that that will be required within the waste storage area, based on a daily collection frequency. Note that two days' waste storage provision has also been applied as a contingency, in case of missed collections.

**Table 3-2: Bin Requirements (Daily Collection)**

Waste Type	Waste Generation / Day* (Litres)	Proposed Container Type	
		1,100 Litre Eurobins / Day (No.)	240 Litre Wheeled Bin (No.)
Refuse*	2,318	2**	n/a
Recycling*	1,475	2	n/a
Food Waste*	421	n/a	2
<b>TOTAL</b>		<b>4</b>	<b>2</b>

\* Calculated based on providing two days' waste storage capacity  
 \*\* Round down

3.3.3. The dimensions of the proposed bins are shown in **Table 3-3**.

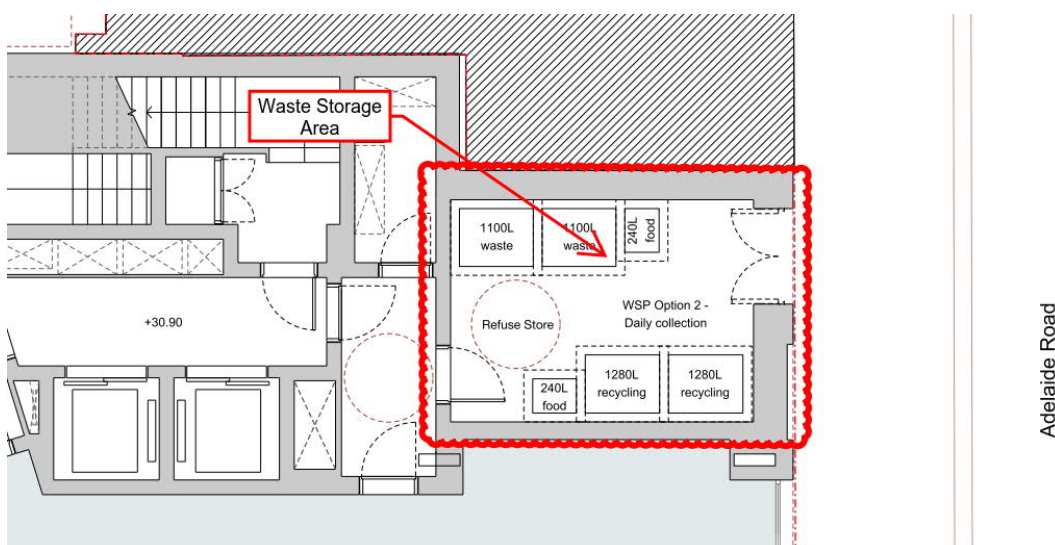
**Table 3-3: Bin Dimensions**

Bin Type	Width (mm)	Depth (mm)	Height (mm)
1,100 litre Eurobin	1,260	990	1,370
240 litre wheeled bin	580	730	1,070

3.3.4. It is proposed that the waste storage area provided for the hotel will have sufficient space to accommodate the number of bins shown in **Table 3-2**.

3.3.5. The location of the proposed waste storage area is shown in **Figure 3-1**.

**Figure 3-1: Waste Storage Area Location - Hotel**



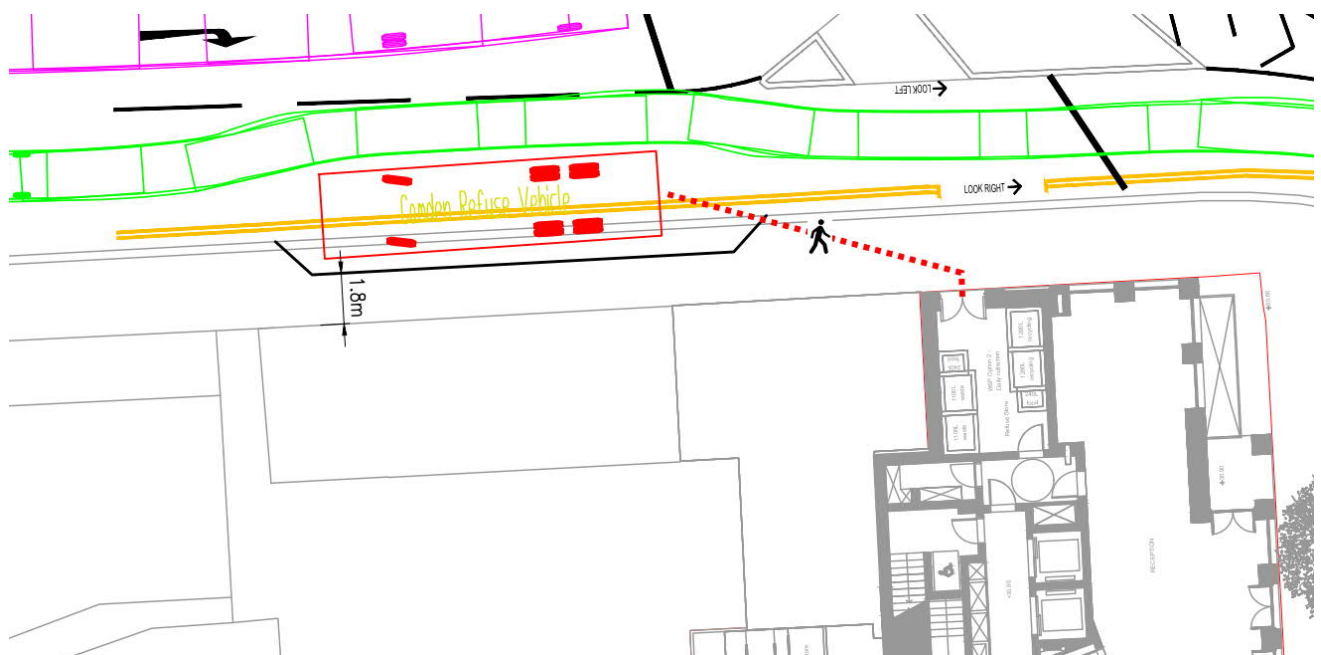
Source: Piercy & Company, Proposed Ground Floor Plan, Drawing No.: 13545-A-00-00-100 Rev B

- 3.3.6. The waste storage area shall be designed in accordance with *BS5906:2005 – Waste management in buildings: Code of practice*. In summary, the facility shall 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 provided; and
  - Suitable lighting and ventilation provided.
- 3.3.7. The hotel operator will be required to manage their waste within their own premises and will be responsible for transferring their waste to the waste storage area.
- 3.3.8. In addition to the waste storage facilities detailed in the **Table 3-2**, the hotel operator will provide suitably designed storage within their tenanted area for any hazardous wastes that they may generate (such as batteries, fluorescent tubes etc). The hotel operator will be responsible for arranging collection of the wastes as they arise via appropriately licensed waste management contractor(s).

## 3.4 WASTE COLLECTIONS

- 3.4.1. On nominated collection days, the appointed commercial waste collection contractor appointed by the hotel operator will park their Refuse Collection Vehicle (RCV) on Adelaide Road adjacent to the proposed waste storage area. Access to the area will be via the external doors which will be fitted with a digital lock, the code to which will be supplied to the waste management contractor prior to the development being occupied.
- 3.4.2. The waste collection contractor will collect the bins directly from the waste storage area and will transport them to the RCV. The access route provided for the commercial waste collection contractor to transport the bins from the waste storage area to the RCV will be step free.
- 3.4.3. The location of the RCV parking area and access route are shown in **Figure 3-2**.

**Figure 3-2: Proposed RCV Parking Location and Access Route**



Source: WSP, Proposed Refuse Collection Car Passing with Bus Opposite Swept Path Analysis, Drawing No.: 70059971-TP-SK-14 rev C

- 3.4.4. Once the bins have been emptied, the commercial waste collection contractor will return the empty bins to the waste storage area.

## 4 SUMMARY & CONCLUSIONS

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### 4.1 SUMMARY OF THE STRATEGY

#### **Hotel Waste**

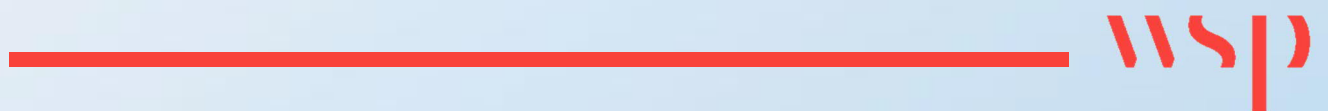
- 4.1.1. The hotel will be provided with a waste storage area at ground floor level which will have sufficient bins to store two days' waste.
- 4.1.2. The hotel operator's staff will be responsible for transferring their waste from the point of generation to the waste storage area.
- 4.1.3. The hotel operator will appoint a licensed waste management contractor who will park on Adelaide Road, and will collect the bins directly from the waste storage area.
- 4.1.4. Once the bins have been emptied, the waste management contractor will return them to the waste storage area.

### 4.2 CONCLUSION

- 4.2.1. This Waste Management Strategy has taken into account the need to lessen the overall impact of waste generation through the recycling of materials from the operational phase of the Proposed Development.
- 4.2.2. 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



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

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### National Waste Policy

#### National Planning Policy Framework (2019)<sup>1</sup>

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)<sup>2</sup>

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.'*

### 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.

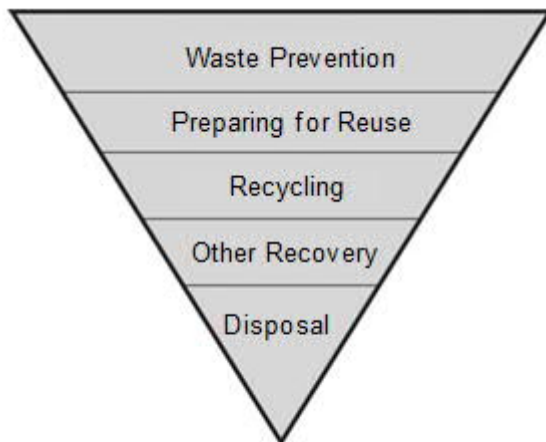
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<sup>1</sup> Ministry of Housing, Communities & Local Government (MHCLG) (2019) *National Planning Policy Framework*  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>2</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

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.

### **Our Waste, Our Resources: A Strategy for England (2018)<sup>3</sup>**

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.

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<sup>3</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

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.

#### **A Green Future: Our 25 Year Plan to Improve the Environment (2018)<sup>4</sup>**

The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. Its aim is to deliver cleaner air and water in cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

With regard to waste management, the plan details aims that include:

- Zero avoidable plastic waste by 2042;
- Reduce food waste; and
- Improving the management of residual waste.

#### **London Waste Policy & Guidance**

##### **The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)<sup>5</sup>**

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;*

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<sup>4</sup> HM Government (2018) *A Green Future: Our 25 Year Plan to Improve the Environment*  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>5</sup> Greater London Authority (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](https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf)

- *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.'*

### **London Environment Strategy (2018)<sup>6</sup>**

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).'*

### **Publication London Plan (December 2020)<sup>7</sup>**

The Mayor has formally approved a new London Plan, the 'Publication London Plan'. It has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 to the Intend to Publish plan.

Once the Mayor has formally received confirmation from the Secretary of State that he is content for the Publication London Plan to be published, the Mayor will proceed with the final steps to publish the final London Plan. On publication it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London

It will be the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

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<sup>6</sup> GLA (2018) *London Environment Strategy* [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

<sup>7</sup> GLA (2020) *Publication London Plan* [https://www.london.gov.uk/sites/default/files/the\\_publication\\_london\\_plan\\_2020\\_-\\_clean\\_version\\_0.pdf](https://www.london.gov.uk/sites/default/files/the_publication_london_plan_2020_-_clean_version_0.pdf)

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

*'Policy D3 Optimising site capacity through the design-led approach*

...

*3.3.18 Shared and easily accessible storage space supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.*

*3.3.19 Buildings and spaces should be designed so that they can adapt to changing uses and demands now and in the future. Their lifespan and potential uses or requirements should be carefully considered, creating buildings and spaces that are easy to maintain, and constructed of materials that are safe, robust and remain attractive over time'*

*'Policy SI7 Reducing waste and supporting the circular economy*

*Resource conservation, waste reduction, increases in material re-use and recycling, and reduction in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:*

*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.'*

## **Local Waste Policy & Guidance**

### **Camden Local Plan (2017)**

The Camden Local Plan sets out LBC's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities. The local plan will cover the period from 2016-2031.

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

*'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.'*



### **Camden Planning Guidance | Design | CPG1 (2018)**

The Camden Planning Guidance has been prepared to support the policies in their Local Plan. The guidance forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.

Section 10 of the Camden Planning Guidance, entitled Recycling and Waste Storage, outlines the appropriate storage for recycling and waste that should be provided in all developments.



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