

Mrs Julie Greaves
Minerals and Waste Policy Team
Spatial Planning and Economy
CHN 216
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Dear Mrs Greaves

Hertfordshire Waste Local Plan Initial Consultation Document February 2018

Thank you for your letter in regards to the above consultation. We are grateful to you for agreeing to accept our response shortly after your consultation close date of 30th March 2018, due to the timing of the meeting of its Cabinet Planning and Parking Panel on 12th April 2018. The content of this letter has been agreed by the Executive Member following consideration of the consultation by Cabinet Parking and Planning Panel.

Welwyn Hatfield Borough Council (WHBC) would like to make a number of comments, in relation to the Waste Local Plan Initial Consultation Document 2018 (WLP). These are set out below:

Draft Vision (Issue 2)

Welwyn Hatfield Council considers it appropriate for the WLP Draft Vision to include specific reference to the importance of protecting both the openness and permanence of the Green Belt and human health. This would help ensure these are key considerations during both the plan making and decision making process, in line with the NPPF (Para 14, 79) and NPPW (Para 6).

Whilst in general we support the aspirations of the vision we consider that at next stage the Draft Vision could be enhanced through being more locally distinctive. This should focus on the key issues of what will happen, where, when and how during the life of the WLP. The benefits are: it will ensure a correlation between the challenges it is seeking to address; as well as make it easier to formulate objectives and policies. With regards to self- sufficiency we consider that this should incorporate the concept of offsetting and that there should be specific reference to this in the vision.

This would ensure that strategic cross boundary matters are addressed in the vision and that account is taken of where modern facilities exist and likely investment decisions.

Draft Objectives (Issue 3 & 4)

WHBC supports the proposed objectives, which are considered to be generally in line with the Draft Vision but we suggest they should include reference to the need to protect the Green Belt

Format of the Local Plan (Issue 5)

WHBC supports the production of a single WLP, as this will generally comply with the NPPF (Para153). This will help ensure a comprehensive waste planning framework is adopted, without any unnecessary delay. It will also encourage the sustainable management of waste and enable new development to be managed more effectively.

Timeframes for the Waste Local Plan (Issue 6)

WHBC supports a 15 year time frame for the WLP, as this would generally be consistent with the timeframes of the Hertfordshire District Local Plans. Further, the difficulties associated with forecasting waste will be compounded over a longer period. However regard should be had to the longer term in setting the strategy.

Local Authority Collected Waste (LACW, Issues 7-8)

We recommend that the LACW Spatial Strategy (2016) should be updated to reflect the most up-to date proposals for housing growth included in the Hertfordshire Local Plans rather than the Objectively Assessed Housing Needs (OAHN).

Further, we would like to raise the issue that the LACW Strategy has not set out the assumptions that were used to project future LACW produced. Due to this, it has failed to clarify why it is expecting the level of LACW to increase by 2031, even though this has remained relatively stable, when the population increased by approximately 20%, between 2004/05-2014/15 (Figure 1).

In line with the PPG, it would be useful for the LACW Spatial Strategy to set out a growth profile of waste, the assumed rate that it is produced (as a starting point) for the projections, based upon household/population growth and waste per household/per capita.

WHBC supports the LACW waste projections scenario that assumes 65% of waste will be recycled or composted by 2031, as a 25% increase was achieved between 2004/5 and 2015/16. This will help move waste up the hierarchy, protect the environment and promote sustainable development.

Commercial and Industrial Waste (C&I, Issues 9-11)

WHBC considers it appropriate to use the Waste Integrator Data (WDI) to estimate how much C & I waste was historically produced but we consider that this approach should be used with caution, as it has the potential of overestimating the level of C & I waste produced. We have concerns that the estimates that C & I waste increased by 88% between 2011/12-2015/16 (Table 5, CGR) seem unlikely during a period of low economic growth. Members consider that Hertfordshire should work

with other waste authorities to lobby government for a more rigorous approach to monitoring waste from both this sector and construction demolition and waste.

Whilst WHBC supports the use of the low growth scenario, to project future C & I waste arising to 2031 recommends that the use of a single East of England Forecasting Modelling (EEFM) projections should be treated with caution, as these vary considerably from one run to another and that it would be appropriate to look at an average for a 10 year period. Furthermore, regard should be had to the employment strategies of respective Local Plans and the extent to which there are proposing to meet EEFM forecasts.

Welwyn Hatfield Council supports a 60% target for recycling and composting C & I waste by 2031.

Construction, Demolition and Excavation Waste (CDE, Issues 12-14)

Welwyn Hatfield Council anticipates that the level of CDE waste produced is likely to increase during the life of the WLP due to the significant level of housing growth and regeneration that is proposed within the Hertfordshire Authorities' Local Plans. However, we consider that a different measure for high growth should be used.

Welwyn Hatfield Council supports the targets to recover 70% of CDE waste by 2020 and divert 90% of it from landfill by 2031.

Waste Management Capacity (Issue 17)

WHBC support the intention to use a site by site approach, to assess the capacity of existing waste facilities for managing future waste arising. However, the assumptions of this assessment should be published.

Allocated Sites (Issue 18)

A strategy that allocates sites for waste uses provides greater certainty and therefore is preferable to one solely dependent on Areas of Search. However the current Waste Site Allocations Plan (2014) allocates eight sites, all of which either failed to come forward for development or deliver the type of waste facilities that led to their allocation. Whilst, new waste facilities have been largely delivered on windfall sites, through criteria based development management facilities.

Welwyn Hatfield Council considers that as part of this review the County Council needs to carry out an analysis of why the existing waste allocations have failed to deliver and whether it would be appropriate to release these sites. In addition, this should explore the factors that developers consider to determine suitability and deliverability of sites (or locations) for new or enhanced waste management facilities.

Areas of Search (Issue 19)

The Waste Core Strategy identified five Area of Search (AOS) for Local Authority Collected Waste. Sites have failed to come to meet the need identified in the Core Strategy. The Draft

Capacity Gap Report would indicate that there is still a need for such facilities. As part of the review the County Council needs to understand why this Policy approach has failed to deliver to date; whether it is the areas in question which are not appropriate; the 'Areas of Search' policy approach being ineffective; or whether the assessment of the need for such facilities is incorrect; or if there is another factor at play.

Safeguarding Sites (Issue 22)

Welwyn Hatfield Council supports the option of "safeguarding waste sites with certain exceptions". The exceptional circumstances should allow for instances where an existing use is causing an environmental nuisance that cannot be controlled via enforcement action. Additionally, this should apply for waste sites with permission that have failed to be implemented (after an appropriate period), as they may no longer be suitable to meet the needs of the industry.

Consultation Areas (Issue 23)

Welwyn Hatfield Council supports the principle of identifying waste consultation areas, providing they are clearly defined on a GIS layer and are related to the extent of the likely impact. This will help ensure non-waste uses are compatible with and do not adversely impact the operations of existing waste management facilities, as well as ensure non-waste uses are well designed and mitigated.

Employment Land Areas of Search (ELAS, Issue 20)

The principle of identifying employment areas as being suitable for waste management facilities is supported, as this will encourage the re-use of previously developed sites, ensure waste management facilities are located within proximity to where waste is produced, to promote sustainable development. However some employment areas are too small with sensitive receptors in close proximity and are therefore likely to be unsuitable for waste management uses. The County Council should undertake a review of the suitability of the ELAS identified in the Site Allocation Plan Alternatively, a criteria based approach could be formulated, to remove the need to identify specific ELAS and would provide the County Council with more flexibility.

List of Policies (Issues 24-27)

WHBC considers it appropriate for the WLP to include strategic and site specific policies for different waste streams. This would help provide a higher level of certainty for how much waste and the types that need to be managed, the locations, as well as encourage right types of facilities in the most appropriate locations and sustainable waste management, as well as minimise any potential impacts and deliver the supporting infrastructure.

Programme for producing the Plan

It is considered that following the call for sites there should be a further Regulation 18 stage of consultation prior to the publication of the regulation 19 proposed submission document. This will

help ensure any soundness and legal compliance issues in relation to the WLP are resolved at an early stage of the plan making process, hence, avoiding any unnecessary delay in its final adoption.

We hope you find the above comments useful for taking WLP forward to the next stage and promoting the sustainable waste management of the Hertfordshire wide area. Please do not hesitate to contact the Planning Policy team, if you have any further queries in relation to this.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sue Tiley', with a stylized flourish at the end.

Sue Tiley

Planning Policy and Implementation Manager