

**Chief Executive and Director of  
Environment: John Wood**



Mrs J Pagdin  
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Contact : Gemma Nicholson  
My ref : SPEU/GN  
Your ref : 6/2015/1997/MAJ

Date : 10 November 2015

Dear Mrs Pagdin

**Location:** Comet Hotel, St Albans Road West, Hatfield, AL10 9RH

**Proposal:** Extension and refurbishment of the Grade II listed hotel (Use Class C1) following demolition of poor quality additions. Erection of student accommodation (Sui Generis) comprising of 361 beds, landscaping and associated works

**Application No:** 6/2015/1997/MAJ

I am writing in response to the above planning application insofar as it raises issues in connection with minerals or waste matters. Should the Borough Council be minded to permit this application, a number of detailed matters should be given careful consideration.

Government policy seeks to ensure that all planning authorities take responsibility for waste management. This is reflected in the County Council's adopted waste planning documents. In particular, the waste planning documents seek to promote the sustainable management of waste in the county and encourage Districts and Boroughs to have regard to the potential for minimising waste generated by development.

Most recently, the Department for Communities and Local Government published its *National Planning Policy for Waste (October 2014)* which sets out the following:

*'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

- *the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*

- *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. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;*
- *the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular, you are referred to the following policies of the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan. The policies that relate to this proposal are set out below:

Policy 1: Strategy for the Provision for Waste Management Facilities. This is in regards to the penultimate paragraph of the policy;

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

In determining the planning application the borough council is urged to pay due regard to these policies and ensure their objectives are met. Many of the policy requirements can be met through the imposition of planning conditions.

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). SWMPs are used to improve materials resource efficiency by identifying methods (including re-use, recycle or recovery) to minimise the amount of waste on site.

It is noted from the Design and Access Statement that the existing extension to the Comet Hotel will be demolition as shown in the Demolition Site Plan. The county council would expect detailed information to be provided within a SWMP covering both waste arisings during the demolition and construction phases. The waste arising from construction will be of a different composition to that arising from the demolition. As a minimum the waste types should be defined as inert, non-hazardous and hazardous and information should be contained within the SWMP regarding its removal from the site and where that waste is being taken to. Good practice templates for producing SWMPs can be found at: <http://www.smartwaste.co.uk/> or <http://www.wrap.org.uk/category/sector/waste-management>.

The SWMP should be set out as early as possible so that decisions can be made relating to the management of waste arisings during demolition, construction and so that building materials made from recycled and secondary sources can be used within the development. This will help in terms of estimating what types of containers/skips are required for the stages of the project and when segregation would be best implemented for various waste streams. It will also help in determining the costs of removing waste for a project. The total volumes of waste during enabling works (including demolition) and construction works should also be summarised.


The county council would encourage the reuse of demolition material on site for example in the footings, foundations or construction roads. However, in the case that demolition material will require off-site disposal, the county council would expect that the developer would have identified sites that are suitable to take such waste.

The SWMP should become a 'living' document that describes the current state of progress with actual waste arisings against the waste management forecasts contained in the SWMP. The SWMP should, therefore, be updated regularly and referred to throughout the construction period.

Completed SWMPs should be passed onto the Waste Planning Authority to collate the data. The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted as part of this development either at this stage or as a requirement by condition, and provide comment to the Borough Council.

I hope the above comments are useful. Should you require any further information, please do not hesitate to contact me on the details above.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Gemma Nicholson', with a long horizontal line extending to the right.

Gemma Nicholson

Planning Officer – Minerals and Waste Policy