

Director of Environment
& Infrastructure: Mark Kemp



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Your ref: 6/2018/3292/MAJ
Date: 23/07/2019

Dear Mrs Sarah Madyausiku

Location: Land adjacent to 45 Broadwater Road Welwyn Garden City
AL7 3AX
Proposal: Erection of four storey development comprising 91 x bed
care home with 13 x care suites
Application Number: 6/2018/3292/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.

Minerals

According to British Geological Data the proposed development site could be underlain with sand and gravel deposits. The county council, as the Minerals Planning Authority, would like to encourage the opportunistic use of these deposits, should they be found in construction of the developments (deposits may be found in the creation of foundations and footings).

Waste

After reviewing the Location Plan submitted with application 6/2018/3292/MAJ, it is clear that the proposed development falls entirely within Employment Land Area of Search (ELAS) 223 Welwyn Garden City Industrial Area. As the Borough Council is aware, ELAS are considered by the Waste Planning Authority as compatible with waste management uses. The Borough Council should be mindful of the potential for a waste management facility to come forward within ELAS 223 throughout the remainder of the life of the adopted Waste Local Plan.

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.

The National Planning Policy for Waste (October 2014) states 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.'*

The county council, as the Waste Planning Authority, would like to refer the Borough Council 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). This aims to reduce the amount of waste produced on site.

Upon reviewing the documents submitted with application 6/2018/3292/MAJ, it is stated that a SWMP has been appended to the Design and Access Statement.

Appendix A (Page 11) contains some information relating to refuse storage and recycling.

A SWMP (more recently in the form of a Circular Economy Statement) is intended to be a live document that is kept on-site and updated regularly throughout the entire duration of a project. It is intended to provide a means to record all waste which arises (waste types and figures) from the project (this includes both demolition and construction waste) and to provide details of where waste was taken to/how waste was managed. The SWMP submitted with application 6/2018/3292/MAJ, should be amended to include the following information.

As a minimum a SWMP should contain the following information:

Project and People

- Identification of the client
- Identification of the Principle Contractor
- Identification of the person who drafted the SWMP
- Location of the site
- An estimated cost of the project
- Declaration that the client and contractor will comply with the requirements of Duty of care that materials will be handled efficiently and waste managed appropriately (Section 34 of Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regs 1991)

Estimating Waste

- A description of the types of waste that are expected to arise on site (recorded through the use of 6-digit European Waste Catalogue codes) and an estimated quantity for each of the types (in tonnes)
- Waste management actions for each of the types of waste (i.e will it be re-used, recycled, recovered or disposed of)

Space for later recordings

The SWMP must include space for the recording of actual figures against those that are estimated at the start, as well as space for the recording of the following information:

- Identification of those responsible for removing the waste from site and details of the sites they will be taking it too
- Explanations for any deviations from what has been set out in the SWMP including explanations for differences in waste arisings compared to those set out in the initial estimations

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 information submitted in the SWMP submitted with application 6/2018/3292/MAJ is not sufficient and the county council, as the Waste Planning Authority, recommends that a pre-commencement condition be attached to the application before development commences. The county council would like to recommend the following wording:

Condition:

The development shall not commence until a SMWP/Circular Economy Statement has been submitted and approved by the county council, as Waste Planning Authority.

Reason: In order to reduce the amount of waste produced on site in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development Policies document.

Yours sincerely,

Emma Chapman



Planning Assistant- Minerals and Waste Policy