

**Director of Environment
& Infrastructure: Mark Kemp**



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**Spatial Planning Unit
Minerals and Waste Policy Team
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Tel: 01992 556275
Email: Minerals.planning@hertfordshire.gov.uk
Your ref: 6/2019/3024/MAJ
Date: 03/01/2020

Dear Mr Michael Robinson

Location: 29 Broadwater Road Welwyn Garden City AL7 3BQ
Proposal: Demolition of office building and erection of 128 flats with associated car parking, landscaping, amenity space, bin and cycle storage, with alterations to existing and formation of new access on Broadwater Road and alterations to the existing access on Broad Court.
Application Number: 6/2019/3024/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 Survey Data the site could potentially 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

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 NPPF recognises waste as a strategic issue and specific national policy is set out in the *National Planning Policy for Waste (October 2014)* which 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.'*

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). This aims to reduce the amount of waste produced on site and should contain information including types of waste removed 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>

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.

The proposed development is located within Employment Land Area of Search (ELAS) 223 Welwyn Garden City Industrial Area. As the Borough Council is aware, ELAS are based upon employment areas and are considered compatible with waste uses because they contain B2 and B8 uses.

The Borough Council should consider the potential for waste management facilities to come forward in this area throughout the remainder of the life of the currently adopted Waste Local Plan.

Yours sincerely,

Emma Chapman

A handwritten signature in black ink, appearing to read 'Emma Chapman', written in a cursive style.

Planning Assistant- Minerals and Waste Policy