HERTFORDSHIRE

WASTE LOCAL PLAN REVIEW

INITIAL CONSULTATION DOCUMENT

FEBRUARY 2018

2016-2031

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1   Chapter 1: Introduction

Overview

1.1   Hertfordshire County Council, as Waste Planning Authority for Hertfordshire, is seeking the views of all interested parties on the way forward for waste planning in the county.

1.2   This initial consultation document is the first consultation that Hertfordshire County Council has published during the process of reviewing the county's existing Waste Local Plan (WLP). The existing Local Plan covers the period 2011-2026 and comprises two documents:

- Waste Core Strategy and Development Management Policies document (adopted November 2012); and
- Waste Site Allocations document (adopted July 2014).

1.3   In addition, a third document, the Employment Land Areas of Search Supplementary Planning Document (adopted November 2015), was published to provide extra guidance for waste-related development.

1.4   This Initial Consultation document sets out the issues and potential options for the matters that will be addressed in the reviewed WLP which, once adopted, will replace the three waste planning documents for Hertfordshire. It will set out the overall approach to waste planning in the county and be used by county council officers when determining planning applications.

1.5   This document has been prepared to give consultees a thorough grounding of each highlighted issue. This is a non-technical document and a series of additional documents have been published to provide the reader with extra details if required. These can be accessed on the county council's online consultation portal http://hertscc-consult.objective.co.uk/portal.

Document Content

1.6   Chapters 2-4 provide details of waste planning policy, the waste management industry and the key issues when planning for waste management in Hertfordshire. The following Chapters, 5-12, focus on individual topic areas in more detail, highlighting the issue/s related to that topic which the county council is seeking views on.

1.7   Chapters 5-12 have a consistent layout. The issue/s related to the topic are highlighted in a box at the start of the chapter. The issues are followed by a section of text containing background information relevant to the issue/s, why

the issue/s have been raised, explanations of the options identified by the county council and, in some cases, the knock-on effect of selecting each option. After the explanatory text, the issue is restated in another box alongside a group of potential options from which consultees are asked to select their preferred choice.

1.8   Where topics have more than one issue, the boxes containing the issues and potential options are included throughout the chapter, after the relevant section of explanatory text.

1.9   Chapter 13 summarises how and when consultees are asked to submit their representations.

How to respond

1.10   The county council would like as wide a response as possible to this initial consultation. This is an important opportunity to tell the council your views on planning for waste management in Hertfordshire and is an opportunity to comment on the suggested policies in preparation for the draft Waste Local Plan.

1.11   The county council would like consultees to respond to all of the issues within this document by selecting their preferred option for each issue. In some cases, it is possible to select more than one option for an issue. There will always be an opportunity to provide reasons for your chosen option/s, alternative options or further comments in a text response section called "any other comments", though there will be a limit to the length of comment.

1.12   Responses can be submitted either through the council's **online consultation portal (Objective)** or by sending completed response forms, available from the consultation portal, to us either by email or letter.

1.13   A full list of options for response submission:

Online Consultation Portal:	http://hertscc-consult.objective.co.uk/portal
Email response forms:	waste.planning@hertfordshire.gov.uk
Address for printed forms:	Minerals and Waste Policy Team, Spatial Planning and Economy, CHN 216, Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN.
Phone no. for queries:	0300 123 4040

1.14   This initial consultation paper is being published for consultation for an eight-week period starting at **9am on 5 February 2018** and ending at **5pm on 30 March 2018**. Please ensure that your responses reach us by the closing date.

2 Chapter 2: Background

The planning system

2.1 The planning system was established to regulate the development and use of land. Its main aim is to balance the demand for development with the protection of the environment and wider surroundings. Planning decisions are made having regard to the planning system and are taken in the wider public interest.

2.2 The Government sits at the highest point of the UK planning system, setting national visions and objectives based on current European policies that local governments must implement.

2.3 In March 2012, the Government introduced the National Planning Policy Framework (NPPF) as the overarching national planning policy for the UK.

2.4 The NPPF includes a presumption in favour of sustainable development, with local planning authorities expected to 'positively seek opportunities to meet the development needs of their area'. The NPPF recognises the importance of sustainable development with the minimisation of waste playing an important environmental role. It states that the provision of infrastructure for waste management should be included in the plan as a strategic priority[1].

2.5 To provide a structure to the planning system, local planning authorities have a statutory responsibility to prepare, implement and review Development Plans for the local area in line with national policy.

2.6 A Development Plan is a series of documents that establish the vision of a Local Planning Authority, setting out policies and proposals for the development and use of land in that area by informing day-to-day decisions as to whether or not planning permissions should be granted.

2.7 The Development Plan for the county is formed of the local plans of the district and borough councils together with the county council plans (Minerals Local Plan and Waste Local Plan) and any adopted Neighbourhood Plans.

2.8 Therefore, in Hertfordshire, the Development Plan comprises:

- 10 district/borough Local Plans,
- the Waste Local Plan,

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[1] NPPF – Para 156

- the Minerals Local Plan[2].
- any adopted Neighbourhood Plans

2.9   The NPPF does not contain specific waste policies. Waste planning policies are set out in the National Planning Policy for Waste (NPPW). The NPPW was published in October 2014 and replaced previous national waste planning policy: Planning Policy Statement 10 (PPS10): Planning for sustainable waste management. As the government's overarching planning policy, the NPPF should be read in conjunction with the NPPW, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste.

2.10   The NPPW states the requirement for Waste Planning Authorities to drive waste up the Waste Hierarchy[3], recognising the need for a mix of types and scale of facilities and to consider the need for additional waste management capacity of more than local significance. It recognises the positive contribution that waste management can bring to the development of sustainable communities.

Hertfordshire County Council Planning Responsibilities

2.11   As Waste Planning Authority (WPA) for Hertfordshire, the county council has a statutory responsibility to plan for future waste requirements and to determine planning applications for waste development. It fulfils this responsibility by preparing the Waste Local Plan (WLP), as part of the Development Plan, which contains appropriate policies against which it can determine individual planning applications.

What is the WLP?

2.12   The WLP combines the requirements set out in national policy with knowledge of the local environment and the high level aims of Hertfordshire County Council.

2.13   The WLP seeks to drive waste up the Waste Hierarchy, reducing the need for landfill as final disposal of waste. The WLP provides details on the amount of waste to be managed and identifies sites and areas for new or enhanced waste management facilities in appropriate locations[4] . The WLP includes policies to protect the environment and wider surroundings whilst balancing the need for the waste management facilities and promoting sustainable development.

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[2] The Minerals Local Plan for Hertfordshire was adopted in March 2007 and is currently being reviewed by the county council.
[3] NPPW – Para 1 (the Waste Hierarchy will be discussed in more detail in Chapter 3)
[4] NPPW – Para 4.

2.14   As stated in the previous chapter, the WLP comprises of two documents. The Waste Core Strategy and Development Management Policies document sets out the strategic, spatial element of the WLP and contains development management policies against which waste planning applications for waste management in the county can be assessed. The Waste Site Allocations document identifies Allocated Sites and Employment Land Areas of Search (ELAS) with potential for delivering waste management facilities to meet the need for additional waste management capacity in the county. In addition, the Employment Land Areas of Search Supplementary Planning Document (adopted 2015) was produced to accompany the WLP by providing further guidance into the suitability of waste-related development on the ELAS identified in the Waste Site Allocations document. All three of these documents will be reviewed.

The need to review the WLP

2.15   The WPA has a statutory duty to keep an up-to-date local plan and national policy states that, to ensure this, frequent reviews of the plan should be undertaken. There is a need to review planning documents for a number of reasons. The planning policy framework must remain up to date to reflect the most recent policy and guidance and to take into account new information and changing circumstances. By keeping an up to date planning policy framework the county council can provide appropriate guidance to waste operators and the general public as to where future waste development should take place. In addition, the county council made a commitment to reviewing its Waste Local Plan within the Waste Site Allocations document, adopted in July 2014. The document states that 'the plan will be reviewed in full every five years and a partial review may be undertaken sooner than that if required'[5].

2.16   The Waste Core Strategy and Development Management Policies document will be five years old in November. This contains the bulk of policies that are used to determine waste applications and an overview of the capacity requirements for the county during the Plan period. The review will produce a single all-encompassing Local Plan rather than separate documents.

2.17   As well as remaining up to date with national policy, the review will ensure that recently published guidance is followed, new information is taken account of and changing circumstances in Hertfordshire are reflected. This provides appropriate guidance to waste operators and the general public as to where future waste management facilities should take place.

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[5] WSA – Para 3.10

The WLP Review Process

2.18   Reviewing an adopted plan is a lengthy, technical process which will take a number of years. This document is the first written consultation provided to the general public following a Stakeholder Event held on 23 August 2017. This event focused on the vision and objectives for the Waste Local Plan and the objectives for the Sustainability Appraisal of the WLP review.

2.19   Following the eight-week consultation period, all responses will be reviewed and where possible incorporated into a draft WLP for publication in 2018. Additionally, a site selection process may be undertaken, which may incorporate a 'call for sites' exercise, if a need for sites is identified. The draft WLP will include policies based on the responses to this initial consultation document and the site selection process (if required). It is intended that the draft WLP will be published for consultation for at least 6 weeks in Autumn 2019.

2.20   Following the feedback from the draft consultation, the WLP will be reviewed with the aim of submission for independent examination in late 2020 and adoption as county council policy in 2021. The timeline of the Waste Local Plan review process is shown in Table 1.

Table 1- Waste Local Plan Timetable		
	2017	Evidence Gathering
Winter	2018	Initial Consultation
		Call for Sites (if required)
Autumn	2019	Draft Plan
Winter	2020	Submission to Secretary of State
Autumn	2021	Adoption of Minerals Local Plan

3 Chapter 3: Waste Management Principles

The Need to Plan for Waste

3.1   Waste is produced by everybody in everyday life across the entire county. This includes individuals, households, businesses and organisations.

3.2   Waste management refers to the activities required to manage waste from its generation to its final disposal. Historically, this involved the collection of waste and its subsequent transportation for disposal at landfill sites.

3.3   Nowadays, greater focus is placed on the environmental impacts of waste generation and the importance of using resources efficiently. This has had an impact on waste management which has undergone significant changes. It has evolved to become a wide-ranging, high-tech industry encompassing numerous innovations. Aspects include opportunities for residents to separate waste prior to kerbside collections, efficient transportation of materials, use of advanced mechanical recycling facilities and even use of waste as a renewable energy source.

3.4   The substantial generation of waste and the increased focus on the importance of its management means that an appropriate network of waste management facilities should be planned for.

Local Authority Responsibilities

3.5   The local authorities in Hertfordshire have different responsibilities related to the management of waste.

3.6   The 10 district and borough councils have responsibility as Waste Collection Authorities (WCAs). They are obliged to implement waste collection services for households and as part of these services, must facilitate the separation of recyclable materials prior to collection.

3.7   Hertfordshire County Council is the Waste Disposal Authority (WDA). It has responsibility to operate a series of Household Waste Recycling Centres (HWRCs) of which there are 17 located around the county. The HWRCs offer residents another option to separate and dispose of their household waste.

3.8   The WDA has a further responsibility to dispose of the waste collected by the WCAs during kerbside collections and by itself at the HWRCs. This includes arranging contracts with commercial waste operators for the transfer and treatment of different elements of the waste stream.

3.9   The WCAs and the WDA work together as the Hertfordshire Waste
        Partnership to coordinate household waste management services in the
        county.

3.10   Responsibility for the management of waste produced by businesses does not
        fall to local authorities. Private companies collect, transfer and manage this
        waste stream. Waste produced by businesses varies in physical nature and
        includes materials which are similar to household wastes as well as materials
        which many people would not automatically consider as waste. The waste
        stream can be broken down into a wide range of materials including
        packaging, construction material, electrical and electronic equipment,
        vehicles, soils and stones, and hazardous and radioactive material.

3.11   As mentioned in the previous chapter, the county council is the Waste
        Planning Authority (WPA) for Hertfordshire which is a separate role to that of
        the WDA. As WPA, the county council must prepare a Waste Plan to manage
        waste arisings in the county for all waste streams, not just the streams which
        the WCAs and WDAs are responsible for.

European Waste Framework Directive

3.12   As a member of the European Union, the legislative framework for the UK
        waste management industry is derived from the Waste Framework Directive
        (WFD). The directive requires all EU member states to take the necessary
        measures to ensure waste is managed without endangering human health or
        causing harm to the environment.

3.13   Following the decision to leave the European Union, the Government have
        proposed to copy all existing European legislation into UK law so the legal
        requirements of the UK with regards to waste management will retain their
        current form.

3.14   There are a number of key principles in UK law that derive from the WFD and
        are relevant to waste planning. They are briefly discussed in the following
        sections.

Proximity Principle

3.15   The Proximity Principle highlights a need to treat and/or dispose of waste as
        close to where it arises as practicable. This aims to minimise the
        environmental impact and cost of the transportation of waste.

3.16   This principle is established in waste planning by the aim of WPAs to achieve
        net self-sufficiency. This means that individual authorities should plan to
        provide sufficient waste management capacity to manage a quantity of waste

equivalent to their own arisings. This does not prevent the inter-authority transportation of waste and improves the likelihood that the wider region will be able to manage its own waste without having to transport material further afield.

The Waste Hierarchy

3.17   The key requirement of the WFD is that EU member states apply a priority order to the management of waste. This order is known as the Waste Hierarchy and consists of the following management options:

Reduction:

3.18   The highest priority is to avoid the generation of waste in the first place. This will reduce the environmental and economic impacts associated with the extraction of natural resources as well as the treatment and disposal of waste materials generated.

3.19   For this to occur, individuals, businesses and organisations need to become more aware of the issues related to waste generation so that the long term consumption of materials becomes more efficient as *wasteful* behaviours are reduced. Improving the *waste awareness* of residents and businesses is one of the objectives of the Hertfordshire Waste Partnership.

3.20   Waste prevention is achieved through an accumulation of individual activities. For example, construction companies could avoid over-ordering materials for construction projects and individuals could avoid buying more food than they will eat. Both these actions would reduce the amount material which will require disposal when it is not used.

Re-use:

3.21   If it is impossible to prevent the generation of waste, re-use is a simple alternative principle whereby the life of a product is prolonged before it is disposed of. By using a product more than once, or more than it used to be used, the need to manufacture new products is reduced and the amount of material thrown away will decrease.

3.22   A commonly known example is the implementation of the 5p plastic bag charge in shops which has prompted the use of 'bags for life' instead of single-use plastic bags. This is a behavioural change which has been successfully implemented and could be attempted for numerous other products and materials.

Recycling:

3.23   Similar, but not as preferable as re-use, is the recycling of materials. Recycling requires products that have reached the end of their useful life to be processed into a new product, rather than being re-used in their original form.

3.24   For example, paper products have long been processed into a pulp which can be cleaned and dried to be made into new paper products. Many materials can undergo processes to be used as an ingredient in new products. This helps to avoid the disposal of materials and replaces the need to acquire new primary resources for production.

Recovery:

3.25   If waste materials cannot be re-used or recycled, it may be possible to recover energy from the material so that the need to burn fossil fuels for the generation of heat and electricity is reduced.

Disposal:

3.26   The Waste Hierarchy recognises that some types of waste, such as hazardous chemicals or asbestos, cannot be safely recycled and direct treatment or disposal is the most appropriate management option.

Circular Economy

3.27   The overarching aim of 'moving waste up the Waste Hierarchy' is the development of a circular economy. A circular economy seeks maximum resource efficiency and aims to keep products, components, and materials at their highest value at all times. As a replacement for the historic 'linear economy', which *takes, makes and disposes,* a circular economy uses products for as long as possible, before utilising their materials in the generation of new products to reduce the need to use new natural resources. Only when no further benefit can be recovered from a resource should it be disposed of.

3.28   The Waste Local Plan will help fulfil the long term aim of achieving a circular economy by identifying the need for waste management facilities to manage waste in line with the priorities set by the EU Waste Framework Directive.

4 Chapter 4: Challenges Planning for Waste in Hertfordshire

Waste in Hertfordshire

4.1 Different waste arisings are managed in a number of ways and it is the county council's responsibility, as WPA, to plan for the provision of sufficient waste facilities to manage them all.

4.2 The WPA must plan for significant amounts of waste from residents, from businesses and from construction amongst other sources. As a densely populated county and with a strong economy that prospers, in part, due to the proximity of London, Hertfordshire produces a significant amount of waste.

4.3 In addition to planning for Hertfordshire's own waste arisings, the county council receives waste from adjoining authorities and others further afield, adding to the complexity of managing waste in the county. Hertfordshire's location in the East of England and close proximity to London means that cross-boundary transportation of waste is common, which places greater pressures on our waste management facilities. However, the county is also reliant upon neighbouring authorities and exports waste out of county for management.

4.4 The management and movement of waste is undertaken by private companies and is based on commercial reasons out of control of the WPA. The amount of waste arisings that need to be managed and planned for within the Waste Local Plan (WLP) is therefore calculated as being the equivalent of waste arisings in Hertfordshire. By achieving this, the WPA would reduce the need for waste to be transported out of county, without actively limiting its transportation by private companies.

Changes to the waste picture in Hertfordshire

4.5 Since the adoption of the current WLP, there have been a number of changes to the overall picture for waste within the county. New waste facilities have added to the capacity to manage certain waste streams and some facilities have closed down.

4.6 As the economy has recovered out of recession, the government has promoted a growth agenda which is being implemented through the district and borough Local Plans in Hertfordshire. An increase in development means there is an increase in waste production from construction projects and during the subsequent occupation of new developments.

4.7   There are also a number of other changes to the spatial portrait of Hertfordshire which have occurred since the adoption of the WLP which must be taken into account when planning for waste.

Population**:**

4.8   The population of Hertfordshire was estimated to be at 1,176,700 in mid-2016. With no dominant city, Hertfordshire is instead characterised by a network of urban areas and its density of 7.16 people per hectare makes it one of Britain's most densely populated counties[6].

4.9   The population of Hertfordshire is projected to increase by 276,400 (23.93%) over the 25 year period from 2014 to 2039[7], with populations for each individual district sharing the increase. This means that significant quantities of waste are produced in multiple locations rather than just one or two key areas.

Housing:

4.10   Since 2011, there has been a significant increase in housing numbers within the county. Figures have risen from 462,168[8] in 2011 to 482,980[9] in 2017, making an increase of 20,812.

4.11   The 10 district and borough councils plan for housing within their local plans and the majority are in the process of updating their adopted plans. In total, the district and borough councils are planning for a further 91,000 dwellings by 2031[10].

4.12   The Local Plans will set out the spatial distribution of the housing required to meet the projected population numbers and this will need to be factored into the emerging WLP when planning for the waste facilities required to manage projected waste arisings within the county.

Economic Growth:

4.13   Hertfordshire's close proximity to London, strong communication links, highly skilled workforce and good quality of life have attracted a wide range of businesses to the county.

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[6] ONS, Mid-Year population estimates 2016
[7] ONS, 2014 based sub national population projections
[8] Quality of life in Hertfordshire 2010 report
[9] Official figures supplied by the Valuation Office Agency on 26 July 2017
[10] Taken from a combination of adopted and emerging Local Plans

4.14 At 78.6%[11], Hertfordshire has an employment rate which is greater than that of the East of England (77.6%) and UK (74.9%) for the 12 months up to May 2016[12].

4.15 Hertfordshire's Local Enterprise Partnership (LEP), is a business-led partnership between local businesses, academia, voluntary organisations and local government. The LEP secured a Growth Deal of £221.5 million from the Government, which will be used to provide and support infrastructure, business and skills in Hertfordshire.

4.16 The focus of the growth deal (which covers the period of 2015/16-2020/21) provides a series of priorities which include enhancements to housing, employment, transport connectivity and creation of jobs to support the core sector.

4.17 The LEP identified three main Growth Areas which surround the main transport routes. These are the M1/M25 Growth Area, A1 (M) Growth Area and the M11/A10 Growth Area[13]. The railway corridors and road networks in each Growth Area are the focal points to providing economic corridors between London, Hertfordshire and the North.

4.18 Waste arisings are expected to increase as a result of the anticipated economic growth.

Overview

4.19 When updating the WLP, the county council must take into account the changes to the waste picture in Hertfordshire that have occurred since the adoption of the WLP. Projected increases in population, housing, and the identified major growth locations must be incorporated to provide a network of waste facilities sufficient to manage the inevitable increase in waste arisings and work towards achieving net self-sufficiency with regards to the county's waste management.

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[11] Hertfordshire Local Information System, Quality of Life Report 2017
[12] ONS 2017, Summary of Labour Statistics
[13] Hertfordshire's Strategic Economic Plan, Hertfordshire Local Enterprise Partnership, March 2014

5 Chapter 5: Vision

The Need for a Vision

5.1 National policy requires the county council, as Waste Planning Authority (WPA) for Hertfordshire, to include a vision in the Waste Local Plan (WLP).

5.2 The vision, alongside a corresponding set of objectives, will set out the overall approach to waste planning in the county. The vision should cover social, economic and environmental factors. The vision and objectives will be reflected throughout the entire local plan, from which the need for sites/areas and policies to assess applications against will follow.

5.3 The existing WLP (2011-2016) includes a vision statement that will need to be reviewed and must comply with national policy and the corporate vision and priorities of Hertfordshire County Council.

National Policy and Guidance

5.4 National policy refers to planning positively within a local plan, towards a shared vision for future development. The vision should set out a locally-specific strategy for the area which positively and proactively encourages sustainable economic growth, creating a shared vision with communities of the residential environment and facilities they wish to see.

5.5 The vision should set out the character of the county and be clear, concise, realistic, measurable and achievable across the period of the plan whilst providing topics that can be easily translated into policy and deliverable outcomes.

Hertfordshire County Council Corporate Vision and Priorities

5.6 The Corporate Plan 2017 - 2021 for Hertfordshire contains high level policy setting out how the council will deliver its aim for Hertfordshire to be "the County of Opportunity". At the top level of this aim is the county council's vision:

"We want to continue to be a county where people have the opportunity to live healthy, fulfilling lives in thriving, prosperous communities."

5.7   The county council has set out four key priorities that describe the vision in greater detail and, if met, collectively ensure that the vision is achieved. The priorities are to give the people of Hertfordshire:

- an opportunity to thrive,
- an opportunity to prosper,
- an opportunity to be happy and safe, and
- an opportunity to take part.

5.8   To deliver its services and overall vision, the county council recognises that it will need to work with partners from the public sector, business, voluntary and community groups to demonstrate five identified values and behaviours. The work of all partners must demonstrate that we are:

- citizen focussed,
- acting with integrity,
- getting things right,
- continuing to innovate, and that
- every penny counts.

5.9   The vision included in the review of the WLP must reflect the corporate vision and instil the priorities, values and behaviours identified in the corporate plan.

The WLP Draft Vision

5.10   Following the WLP stakeholder event on 23 August 2017, at which Hertfordshire County Council officers presented a preliminary draft vision to obtain initial feedback from attendees, a new vision has been developed for consultation as part of this publication.

5.11   The county council seeks the views of consultees on the aspects of national and Hertfordshire County Council policy that the vision covers adequately and whether there are any other aspects not listed that the vision should cover.

5.12   The vision is shown below:

Draft Vision

Through engagement with the community, and working in partnership with other waste and planning authorities, Hertfordshire will be waste aware and achieve net self-sufficiency by 2031, towards accomplishing zero waste.

Hertfordshire County Council will ensure the implementation of the Waste Hierarchy, promoting waste reduction, reuse and recycling, therefore minimising waste needing final disposal as part of the 'circular economy'.

The Plan will work to resolve the county's capacity gap, and will cooperate with relevant authorities, including London, to manage waste movements, both into and out of the county.

There will be a flexible and supportive plan based approach towards waste management facilities, embracing modern technologies that reduce carbon emissions. Sustainable development will be achieved through the consideration of sustainable transport links, protection of the County's wildlife habitats, and natural, built and historic environments. Through this a healthy community environment in Hertfordshire will be maintained.

Issue 1:

Which aspects of national policy and Hertfordshire County Council priorities does the Vision cover adequately?

Options:
(Select all that apply)

- Planning positively
- Driving towards sustainable development and economic growth
- Locally distinctive to Hertfordshire
- Provides a vision for what the county will be like in 20 years?
- Based on current trends and trajectories
- Clear
- Concise
- Realistic
- Measurable
- Provide points that can be translated into policy
- Shared vision for future development
- Meets the needs of the communities
- Protects against the sterilisation of minerals
- Citizen focussed
- Acting with integrity
- Getting things right
- Innovative
- Every penny counts
- Any other comments

Issue 2:

Are there any other aspects that the Vision should cover?

Options:

a.   Yes

b.   No, please explain

c.   Any other comments

6 Chapter 6: Objectives

The Need for Objectives

6.1 To achieve the vision of the Waste Local Plan (WLP), a series of objectives must be put in place.

6.2 The objectives are vitally important as they will be the guiding principles in the development of robust and comprehensive policies that set out the quality of waste development expected for the county.

6.3 Together, the vision and objectives set out the overall approach to waste planning in Hertfordshire by providing a foundation to the WLP from which the need for sites/areas and policies to assess applications against will follow.

National Policy and Guidance

6.4 National policy is less prescriptive for the requirements of Local Plan objectives than it is for the contents of a vision, merely stating that the policies contained in the Local Plan should be based on a series of stated objectives for the future of the area.

6.5 National guidance provides a range of characteristics that Local Plan objectives must meet. These are to:

- Be of a typical number (10-20)
- Be manageable to guide key areas of the plan development
- Be clear and realistic
- Be locally distinctive and spatial in terms of the wider planning framework
- Identify how national policy influences priorities and objectives
- Include wider corporate priorities and planning objectives of neighbouring areas
- Link with objectives in the Sustainability Appraisal[14] scoping report.

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[14] Local Plans must be assessed against a Sustainability Appraisal. This is discussed in more detail in Chapter 12.

6.6 In accordance with this guidance and feedback from the Stakeholder Event held prior to the publication of this consultation document, the following list of objectives has been developed for the WLP review in line with the WLP draft vision and the Corporate Plan 2017-2021 for Hertfordshire:

Draft Objectives:

Obj 1   Promote the provision of well-designed and efficient facilities, that drive waste management practices up the Waste Hierarchy, and which reduce residual waste disposal;

Obj 2   Promote the location of well-situated waste facilities to ensure minimal harm to human health, and the protection of Hertfordshire's wildlife habitats, and natural, built and historic environments;

Obj 3   Encourage the location of waste facilities as close as practicable to the origin of waste;

Obj 4   Encourage the increased and efficient use of recycled waste materials in Hertfordshire (for example as aggregate) in line with the Waste Hierarchy and the Hertfordshire Waste Partnership;

Obj 5   Support sustainable low-emissions modes of transport, and reduce the dependency on road transport, through the promotion of navigable water and rail as the principal means of waste transportation;

Obj 6   Support the prevention and minimisation of waste generation in line with the Waste Hierarchy, and where waste cannot be avoided, maximise the recovery value from waste;

Obj 7   Cooperate with all partners in the county to encourage integrated county wide waste planning, aligning with other local plans;

Obj 8   Recognise the importance of the waste sector in the local economy as a generator of employment and its provision of infrastructure which supports businesses and communities;

Obj 9   Work with all relevant waste authorities to manage the equivalent of the county's own waste arisings; and

Obj 10   Support the provision of waste facilities that demonstrate the ability to mitigate negative contributions towards, and the resilience to adapt to the potential impacts of climate change.

Issue 3:

Would meeting all of the draft objectives ensure that the vision presented in Chapter 5 is achieved?

Options:

a.   Yes

b.   No, please explain

c.   Any other comments

Issue 4:

Has the county council developed the correct set of objectives?

a.   Yes

b.   No, please explain

c.   Any other comments

7 Chapter 7: Plan Approach & Plan Length

Related Objectives:

Obj 7   Cooperate with all partners in the county to encourage integrated county wide waste planning, aligning with other local plans; and

Obj 9   Work with all relevant waste authorities to manage the equivalent of the county's own waste arisings.

Issues 5-6:

Do you agree with the county council's intention to prepare a single Waste Local Plan document?

How long should the duration of the Waste Local Plan be?

Approach to developing the Waste Local Plan

7.1   The review of the Waste Local Plan (WLP) will need to include a strategic element for waste planning in Hertfordshire, development management policies by which waste planning applications will be judged and a policies map.

7.2   The format of the document could follow that of the existing document or the currently recommended way of plan-making.

Previous approach to producing the Waste Local Plan

7.3   The current adopted WLP is comprised of two documents. The Waste Core Strategy and Development Management Policies document (WCS&DM) (adopted November 2012) sets out the strategic, spatial element of the WLP and contains development management policies against which planning applications for waste management in the county can be assessed. The Waste Site Allocation document (WSA) (adopted July 2014) identifies sites and Employment Land Areas of Search (ELAS) required to meet the need for additional waste management capacity in the county. In addition, the Employment Land Areas of Search Supplementary Planning Document (2015) (ELAS SPD) was produced to accompany the WLP by providing further guidance into the suitability of waste-related development on the ELAS identified within the WSA.

7.4 Whilst it is called a 'Waste Local Plan', the approach taken in its preparation followed the previous national guidance which was known as a 'Waste Development Framework'. The system at the time recommended having more than one document. This has since being updated.

Single Local Plan Approach

7.5 Each part of a Local Plan which contains planning policy must go through an examination with a Planning Inspector. This can result in there being more than one examination, with subsequent documents having to conform with the original strategy, which may have been examined some time beforehand.

7.6 National policy now recommends the preparation of a single Local Plan document. Whilst additional Local Plan documents can be produced, for example a separate site allocations document or Area Action Plan, government policy states that there should be a clear justification for doing so.

7.7 By producing one single Local Plan, the council would include the strategy, policies and policies map in one document. This does have advantages including the ease of understanding by the reader and determination of applications by the decision maker with all the information in the one place.

7.8 It is proposed that the emerging Local Plan will be prepared as a single Waste Local Plan document.

Issue 5:

Do you agree with the county council's intention to prepare a single Waste Local Plan document?

Options:

a.   Yes

b.   No, if so please specify

c.   Any other comments

Why a Plan Length Needs Defining

7.9 The county council should plan for net self-sufficiency in terms of waste management, thereby managing the equivalent of the county's own waste arisings throughout the duration of the WLP. To achieve this, the length of the plan needs to be defined.

7.10   The existing WLP covers a 15 year period 2011-2026 and current national policy states that new plans should be drawn up over an appropriate time scale, preferably covering a 15 year period taking account of longer term requirements.

7.11   A 15 year plan length will ensure that a suitably long term view is taken account of within the WLP in line with national policy.

7.12   As Waste Planning Authority (WPA) for Hertfordshire, the county council can develop an alternative length of plan if it is appropriate for the local area. This allows the county council to take account of the changing waste management contracts in place for LACW and market requirements for the management of the other waste streams and assess whether this affects how waste management facilities should be planned for.

Potential Range of Plan Length

7.13   With national policy advising local plans to take account of longer term requirements, the WLP should be no shorter than the duration of 15 years. The option exists that the length of the plan be longer. The following sections show there are two clear options for setting the length of the WLP.

15 Year Plan

7.14   National policy states that new plans should preferably cover a 15 year period.

7.15   The background evidence that supports the WLP is an analysis of the waste management capacity in the county[15]. This gives information in respect of the existing capacity to manage all waste streams in the county and highlights the need for any new capacity required in the future.

7.16   The data that is collected comes from different sources, some of which are more reliable than others. The turnover of waste facilities can happen rapidly with the closure of sites. Therefore obtaining up to date data is a constant monitoring task for the county council.

7.17   Predicting the waste capacity requirements over a 15 year period can be a challenge with much uncertainty assigned to the prediction of future arisings. Many aspects of the waste predictions are based on housing growth which is being planned for by district and borough Local Plans up to 2031. The difficulty predicting future demand beyond planned growth up to 2031 leads

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[15] A Draft Capacity Gap Report has been published alongside this document and will be discussed in more detail in Chapter 8.

the county council to suggest that the WLP should cover a maximum of 15 years to match the emerging district and borough Local Plans.

An Alternative Time Frame

7.18   As it can be assumed that the WLP should be no shorter than the preferred duration of 15 years, the county council could consider a longer period than that suggested by national policy.

7.19   Any alternative time frame would have to be justified. This would need to rely on a clear capacity gap analysis and proposed calculation of predicting further into the future what the waste management facility requirement would be.

Issue 6:

How long should the duration of the Waste Local Plan be?

Options:

a.   15 years

b.   A longer time frame, if so please specify

c.   Any other comments

8 Chapter 8: Waste Data & Capacity Gap

Related Objectives:

Obj 1   Promote the provision of well-designed and efficient facilities, that drive waste management practices up the Waste Hierarchy, and which reduce residual waste disposal;

Obj 4   Encourage the increased and efficient use of recycled waste materials in Hertfordshire (for example as aggregate) in line with the Waste Hierarchy and the Hertfordshire Waste Partnership;

Obj 6   Support the prevention and minimisation of waste generation in line with the Waste Hierarchy, and where waste cannot be avoided, maximise the recovery value from waste;

Obj 7   Cooperate with all partners in the county to encourage integrated county wide waste planning, aligning with other local plans;

Obj 9   Work with all relevant waste authorities to manage the equivalent of the county's own waste arisings; and

Obj 10   Support the provision of waste facilities that demonstrate the ability to mitigate negative contributions towards, and the resilience to adapt concerning the potential impacts of climate change.

Issues 7-17:

Do you agree with the county council's intention to use figures from the HCC LACW Spatial Strategy as the basis for future Local Authority Collected Waste arisings in the county?

Which recycling and composting scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future Local Authority Collected Waste arisings in the county?

Do you agree with the county council's intention to use figures from the Waste Data Interrogator to determine Commercial and Industrial waste arisings in the county?

Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future Commercial and Industrial waste arisings in the county?

> Do you agree with the county council's intention to use a target to recycle and compost 60% of Commercial and Industrial waste?
>
> Do you agree with the county council's intention to use figures from the Waste Data Interrogator to determine Construction, Demolition and Excavation waste arisings in the county?
>
> Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future Construction, Demolition and Excavation waste arisings in the county?
>
> Do you agree with the county council's intention to use a target to recover 70% of Construction, Demolition and Excavation waste by 2020 and to divert 90% of Construction, Demolition and Excavation waste from landfill by 2031?
>
> Do you agree with the county council's intention to use figures from the Hazardous Waste Data Interrogator to determine hazardous waste arisings in the county?
>
> Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future hazardous waste arisings in the county?
>
> Do you agree with the county council's intention to use a site-by-site analysis of existing waste sites, utilising all available data, to determine the overall waste capacity of Hertfordshire?

Net Self-Sufficiency

8.1   The county council should plan for Hertfordshire to achieve net self-sufficiency with regards to waste management. This requires the provision of enough waste facilities to manage the equivalent quantity of waste that is produced in the county.

8.2   Waste does not always remain within the authority or region where it arises. The level of inter-authority transport can be significant and can change from year to year based on the development of new sites, changes to collection services or commercial decision-making. Significant quantities of waste are exported to Hertfordshire from adjoining authorities, including London.

8.3   The authorities in the East of England all agreed to plan for net self-sufficiency and London is using the current review of the London Plan to achieve this aim. Net self-sufficiency should allow the region as a whole to manage its own waste whilst allowing the cross-boundary transportation of waste for management. The cross-boundary movements complicate the picture of

waste arisings but do not affect the quantity of waste that Hertfordshire should plan for in the emerging WLP.

8.4　The county council must quantify the current and future waste arisings of the key waste streams in Hertfordshire and compare them against the capacity of existing waste management facilities.

8.5　The three main waste types that require analysis during Plan production are:

- Non-Hazardous Waste
- Construction, Demolition and Excavation Waste
- Hazardous Waste.

8.6　The identification of sufficient management capacity, or a lack thereof, will justify the allocation or exclusion of potential waste sites in the emerging WLP and will help to shape policies which will be used to determine individual planning applications throughout the Plan period.

8.7　There are inherent uncertainties associated with waste data which add complexity to this task. Historically, quality of waste data has been poor due to inconsistent data gathering, incomplete coverage of studies and varied interpretations of waste definitions. Data is often incomplete and the confidence in figures varies by waste stream and location.

8.8　Using the best possible available waste data, there is a need to plan for future waste management and a key element of the analysis of capacity requirement is the identification of a quantified capacity gap.

Draft Capacity Gap Report - East of England Methodology

8.9　Hertfordshire County Council is a member of the East of England Waste Technical Advisory Board (EoE WTAB) with the 10 other WPAs in the East of England. To achieve a simplified and more consistent approach to waste planning in the region, the WPAs in the EoE WTAB agreed a joint methodology to calculate waste arisings, capacities and movements.

8.10　Based on this methodology, the county council has produced a Draft Capacity Gap Report (CGR) to be read alongside this Initial Consultation document. The CGR can be found at: http://hertscc-consult.objective.co.uk/portal. The document aims to minimise uncertainty of the calculations used to identify Hertfordshire's potential waste capacity gaps. The CGR describes the assumptions that have been included in the waste calculations and provides two scenarios of growth for each waste stream to cover the expected Plan period from 2016 to 2031.

8.11   The remainder of this chapter offers a chance for the county council to seek the views of consultees on the assumptions used and the growth scenarios to be used in the final CGR.

8.12   The county council will take account of consultee responses and update the CGR to guide the contents of subsequent consultation documents during Plan production.

Non-Hazardous Waste

8.13   Non-hazarous waste is made up of two main waste streams: Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I). The two streams can closely resemble each other physically and often require very similar processing. However, because they originate from different sources, they are subject to different levels of recording and the certainty in the data available for each waste stream varies significantly.

Local Authority Collected Waste:

8.14   Local Authority Collected Waste (LACW) is defined as the waste collected by local authorities. The majority is generated by households and is either collected by Waste Collection Authorities (WCAs) during kerbside collections or at Household Waste Recycling Centres (HWRCs). An element of Commercial and Industrial (C&I) Waste is also collected. Records of LACW are considered reliable due to the systematic processes of measuring waste collected by the WCAs.

8.15   The county council is the Waste Disposal Authority (WDA) for Hertfordshire and a member of the Hertfordshire Waste Partnership with the county's 10 WCAs. The WCAs and WDA have to plan their future services and as part of this responsibility, Hertfordshire County Council updated the HCC LACW Spatial Strategy in October 2016. It included projections of LACW waste arisings up to the year 2031, covering the expected period of the emerging WLP.

8.16   The Spatial Strategy's overall waste forecasts were based on projections of housing growth for each district within the county, totalling a 15% increase in population by 2031. The growth percentages were applied to the entire LACW stream with two scenarios subsequently introduced. The first scenario assumes the county achieves a target to recycle or compost 65% of LACW by 2031, the second scenario assumes a rate of 60% by 2031. Taking this into account, the residual fraction of waste in each scenario was projected to fall in a linear fashion from the recorded 2015 figure. The quantities of recycled and composted waste maintained an exact ratio with one another whilst increasing to balance the fall in residual waste production.

8.17 Due to the reliable LACW data, the county council included the figures from the LACW Spatial Strategy in the CGR and did not consider it necessary to include an additional scenario for total LACW arisings.

Issue 7:

Do you agree with the county council's intention to use figures from the HCC Local Authority Collected Waste Spatial Strategy as the basis for future LACW arisings in the county?

Options:

a.   Yes

b.   No, please provide an alternative option and reasoning

c.   Any other comments

Issue 8:

Which recycling and composting scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future Local Authority Collected Waste arisings in the county?

Options:

a.   65% recycling and composting by 2031

b.   60% recycling and composting by 2031

c.   Another scenario, please provide an alternative option and reasoning

d.   Any other comments

Commercial and Industrial Waste:

8.18 Commercial and Industrial (C&I) waste is produced by commercial businesses and industries. It is collected and managed by private waste companies. Individual companies will have records of the waste they collect. Data for the arisings of this waste stream are not collated and remain unavailable to the WPA.

8.19   There are two alternative sources of data which the CGR could use as a basis for historical arisings: the Waste Data Interrogator (WDI) or survey data.

8.20   The WDI is published annually by the Environment Agency and compiles information from individual waste transfer notes which registered waste carriers must complete when transporting waste under the Duty of Care system. Information for LACW and C&I waste is combined as Household, Industrial and Commercial waste (HIC) in the WDI which means that the C&I portion must be calculated by subtracting the LACW from the total HIC tonnage.

8.21   The alternative option is to use survey data. The most recent national survey was commissioned by Defra and undertaken in 2009. The survey produced data for the East of England region rather than individual WPAs and the division of regional data into local authority data adds further inaccuracy to the already outdated survey.

8.22   Although the C&I waste survey figures and projections were included in the Draft East of England Plan published in 2010, the CGR uses WDI figures for historical C&I waste arisings because the WDI figures are considered more reliable and up to date.

> Issue 9:
>
> Do you agree with the county council's intention to use figures from the Waste Data Interrogator to determine Commercial and Industrial waste arisings in the county?
>
> Options:
>
> a.   Yes
>
> b.   No, please provide an alternative option and reasoning
>
> c.   Any other comments

8.23   The CGR contains two options for forecasting future arisings of C&I waste, both of which are calculated using the East of England Forecast Model (EEFM). The EEFM is an economic forecasting tool maintained by Cambridge Econometrics which was last updated in August 2016. It provides projections of growth for a range of sectors, giving outputs related to land use, employment rates and overall economic performance.

8.24 A Low Growth scenario is presented in the CGR using forecast trends of employment levels for a range of industry sectors as a proxy for the development of waste arisings for different elements of the C&I waste stream. These trends were applied to the recorded 2015 C&I arisings derived from the WDI and extrapolated to 2031.

8.25 A High Growth scenario is presented using the forecast changes to Gross Value Added (GVA) from the EEFM. GVA is a representation of the income of business on a regional scale. Using GVA as a basis for future C&I waste arisings would assume that waste arisings are still directly correlated to overall economy activity.

> Issue 10:
>
> Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future Commercial and Industrial waste arisings in the county?
>
> Options:
>
> a. Low Growth - the EEFM forecasts of employment levels for individual sectors
>
> b. High Growth - the EEFM forecast of GVA
>
> c. Another scenario, please provide an alternative option and reasoning
>
> d. Any other comments

8.26 To forecast the residual portion of the C&I waste stream, the CGR includes a target to achieve 60% treatment for C&I waste by 2031. The Draft Revision of the East of England Spatial Strategy (2010) stated that C&I targets should be comparable to those for LACW. The adopted Hertfordshire WLP contains a target that is 5% less than that for LACW allowing for the fact that LACW undergoes stringent separation prior to collection which C&I waste management is unlikely to match. The targets for LACW recycling and composting included in the HCC LACW Spatial Strategy have been applied to C&I waste with this 5% reduction for each year up to 2031.

Construction, Demolition and Excavation Waste

8.27   Data for Construction, Demolition and Excavation (CD&E) waste is not extensive and is considered unreliable. CD&E waste is often treated under environmental permit exemptions, re-used on site or used in engineering works as a secondary element of a non-waste development (for example when re-profiling land). For these reasons, it often does not get recorded.

8.28   There are two main sources of data which the CGR could use as a basis for historical arisings: The Waste Data Interrogator (WDI) or survey data.

8.29   The WDI compiles Inert/Construction and Demolition waste which is considered a reasonable representation of CD&E waste. Most waste sites are permitted by way of an Environmental Permit, by the Environment Agency and the WDI reports the material managed through permitted facilities. It does not include waste managed at facilities that are exempt from Environment Agency permits. The figure is a representation of CD&E waste *managed* rather than *arisings* but there are limited alternatives to determine the historical arisings.

8.30   The main alternative is to use the national surveys of CD&E waste carried out by central Government most recently in 2005. These surveys are over 10 years old and have been acknowledged to contain a very high margin of error.

8.31   The CGR uses WDI figures to determine historical CD&E waste arisings. Waste managed at transfer stations is omitted from the WDI figures to prevent unnecessary double counting of the waste (ie. where waste is treated at more than one site).

8.32   The CGR presents two options for the future arisings of CD&E waste.

8.33   National planning guidance states that due to the uncertainties with CD&E waste data, WPAs should start from the basis that net arisings of CD&E waste will remain constant. Therefore, as a Low Growth scenario, the CGR forecasts that CD&E arisings will remain at the same level as the 2015 figure outputted by the WDI.

8.34   As a High Growth scenario, a similar methodology to that presented for the High Growth scenario for C&I waste is presented whereby the quantity of CD&E waste matches the change in GVA forecast by the EEFM. This scenario assumes that levels of construction will increase as the economy grows, and waste from construction and demolition will increase as a result.

8.35   The CGR contains targets to recover 70% of CD&E waste by 2020 and divert 90% of CD&E waste from landfill by 2031. The targets are derived from the Waste Management Plan for England and the Draft Revision of the East of England Regional Spatial Strategy 2010 respectively. The targets allow the CGR to differentiate between the capacities required for the recovery and disposal of the waste stream.

Issue 14:

Do you agree with the county council's intention to use a target to recover 70% of Construction, Demolition and Excavation waste by 2020 and to divert 90% of Construction Demolition and Excavation waste from landfill by 2031?

Options:

a.   Yes

b.   No, please provide an alternative option and reasoning

c.   Any other comments

Hazardous Waste

8.36   The Environment Agency monitors hazardous waste management stringently due to the known potential harm to human health and the environment. Hazardous waste management is well recorded and data is considered robust. The EA publishes information about hazardous waste annually in the Hazardous Waste Data Interrogator (HWDI) which is released alongside the WDI.

Issue 15:

Do you agree with the county council's intention to use figures from the Hazardous Waste Data Interrogator to determine hazardous waste arisings in the county?

Options:

a.   Yes

b.   No, please provide an alternative option and reasoning

c.   Any other comments

8.37   The CGR presents two options for the future arisings of radioactive waste.

8.38   A Low Growth scenario is presented assuming that waste arisings will remain at the same level as the 2015 figure outputted by the HWDI.

8.39   National planning guidance states that WPAs should plan for future hazardous waste arisings based on extrapolated time series data. Therefore, as a High Growth scenario, the CGR presents future hazardous waste arisings based on a continuation of the recent trend of arisings from historical HWDI records.

> Issue 16:
>
> Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast future hazardous waste arisings in the county?
>
> Options:
>
> a.   Low Growth – maintain the 2015 arising figure
>
> b.   High Growth – extrapolating the recent trend of arisings
>
> c.   Another scenario, please provide an alternative option and reasoning
>
> d.   Any other comments

Waste Management Capacity

8.40   Waste facilities frequently do not run at full capacity and facilities may even be constructed at a capacity less than that specified in planning permission or in an environmental permit. The capacity of a facility may also be affected by operational or management practises that do not require changes in planning permission or permit.

8.41   Whilst the theoretical capacity of an individual site may be known, the maximum quantity of waste that a facility will manage may not be. This adds further uncertainty when attempting to calculate the capacity of the waste management industry at the county-scale.

8.42   The CGR uses a methodology that looks at each waste site individually in order to gain a realistic capacity based on all the available information including historical WDI responses, replies to the WPA's annual waste surveys, planning permissions and environmental permit data. This was considered an appropriate way of preventing unrealistic capacity from being included in the calculations.

Issue 17:   36

Do you agree with the county council's intention to use a site-by-site analysis of existing waste sites, utilising all available data, to determine the overall waste capacity of Hertfordshire?

Options:

a.   Yes

b.   No, please provide an alternative option and reasoning

c.   Any other comments

9   Chapter 9: Waste Sites & Areas

Related Objectives:

Obj 1   Promote the provision of well-designed and efficient facilities, that drive waste management practices up the Waste Hierarchy, and which reduce residual waste disposal;

Obj 2   Promote the location of well-situated waste facilities to ensure minimal harm to human health, and the protection of Hertfordshire's wildlife habitats, and natural, built and historic environments;

Obj 3   Encourage the development/location of waste facilities as close as practicable to the origin of waste;

Obj 5   Support sustainable low-emissions modes of transport, and reduce the dependency on road transport, through the promotion of navigable water and rail as the principal means of waste transportation;

Obj 7   Cooperate with all partners in the county to encourage integrated county wide waste planning, aligning with other local plans; and

Obj 9   Work with all relevant waste authorities to manage the equivalent of the county's own waste arisings.

Obj 10   Support the provision of waste facilities that demonstrate the ability to mitigate negative contributions towards, and the resilience to adapt concerning the potential impacts of climate change.

Issue 18-21:

Should the Waste Local Plan identify Allocated Sites?

Should the Waste Local Plan identify Areas of Search?

Should the Waste Local Plan continue to identify Employment Land Areas of Search to help guide future waste management?

Should the County Council use criteria-based policies in the Waste Local Plan to determine whether a site is suitable for waste development?

The Existing Approach to Identifying Sites and/or Areas

9.1   The adopted Waste Local Plan (WLP) identifies Allocated Sites, Areas of Search and Employment Land Areas of Search (ELAS). These are shown in the Waste Site Allocations document (adopted July 2014) and further information on the ELAS is given within the ELAS Supplementary Planning Document (adopted November 2015).

9.2   The purpose of identifying sites and areas was to find suitable locations to accommodate facilities for sustainable waste management to meet the identified requirements for management capacity during the Plan period. The selection of these locations was based on a process of site assessment.

9.3   From this process, eight Allocated Sites, five Areas of Search and 60 ELAS were identified. A combination of sites and areas would ensure flexibility for operators to develop sufficient facilities in appropriate locations; not all of them would be needed.

9.4   Five existing strategic sites were also identified due to their importance to the current and future waste management of local authority collected waste in the county.

National Policy Requirements

9.5   Since the adoption of the WLP, national policy requirements for waste planning have changed, including changes to the requirements for the allocation of sites and areas.

9.6   In October 2014, the National Planning Policy for Waste (NPPW) was introduced. The NPPW sets out detailed waste planning policies which all local planning authorities should have regard to. It is intended to be read in conjunction with the National Planning Policy Framework (NPPF), the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents.

9.7   In relation to identifying sites and areas in Local Plans, the NPPW states that WPAs should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. in preparing their plans, and should:

- Identify sites and/or areas for new or enhanced waste management facilities in appropriate locations,
- Consider a broad range of locations including industrial sites,

- Give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages[16]

9.8   The county council must determine how to fulfil the requirement of national policy to identify sufficient opportunities to meet the waste needs of Hertfordshire. This could involve the identification of locations for future waste development or the strengthening of criteria-based policies which individual planning applications would be determined against in any location across the county. A range of options exist for the type of location to be identified and included in the WLP. The county council seeks the views of consultees on the use of these options in the remainder of this chapter.

Allocated Sites

9.9   Allocated Sites were considered to be the most suitable locations to manage the county's existing and future waste arising during the period of the adopted WLP. The county council has found through its monitoring responsibilities, as reported within its Authority Monitoring Reports, that the identified Allocated Sites have not been chosen by developers to deliver waste management facilities. Instead, the general criteria based policy has been used to determine applications on land outside of Allocated Sites and ELAS.

9.10   The county council must determine whether to identify Allocated Sites within the emerging WLP as the most suitable locations to manage the county's waste arisings during the Plan period.

> Issue 18:
>
> Should the Waste Local Plan identify Allocated Sites?
>
> Options:
>
> a.   Yes
>
> b.   No, please explain
>
> c.   Any other comments

Areas of Search

9.11   Areas of Search offer broader guidance than the Allocated Sites for the location of future waste management capacity. They are based on distances

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[16] NPPW – Paragraph 4

from the major population centres within the county and attempt to guide waste development to the locations where the majority of waste arises.

9.12 The Areas of Search can be used for specific waste streams or for specific facility types for the transfer or treatment of waste.

9.13 The county must determine whether to identify Areas of Search to help guide waste management for certain towards the areas of greatest population within the county to minimise the mileage that waste will be transported for management once it has been generated.

Issue 19:

Should the Waste Local Plan identify Areas of Search?

Options:

a. Yes

b. No, please explain

c. Any other comments

Employment Land Areas of Search (ELAS)

9.14 National policy provides support for the use of sites identified for employment uses for waste management[17]. ELAS were identified in the adopted WLP to guide future waste development and to provide a mechanism whereby a variety of waste management uses could come forward for development.

9.15 The ELAS are based on Employment Areas identified in district and borough Local Plans. They predominantly contain land designated for general industry (B2) and storage and distribution (B8) uses. These land uses are considered compatible with waste management. The ELAS offer flexibility to support different waste management facility types and sizes, based on the variety and compatible nature of the Employment Areas.

9.16 Since the adoption of the WLP, changes have been made to the planning system which the county council must take account of when determining how to guide the location of future waste development.

9.17 The General Permitted Development Order 2015 allows for the conversion of certain types of employment land into residential use without the need to

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[17] NPPW – Para 4

apply for planning permission. These 'Permitted Development Rights' allow development to occur which could make ELAS less appropriate for waste development than when the WLP was adopted.

9.18   A number of conversions from office and business space to residential space have been carried out under Permitted Development Rights. Eight out of the 60 ELAS have seen office-to-residential conversions take place. This includes 14 completed conversions and current approval for a further 13 conversions.

9.19   Additionally, the county council needs to take into consideration that many of the emerging district and borough Local Plans will contain revisions to existing, or new Employment Areas.

9.20   The combination of Permitted Development Right conversions and the potential for re-allocation of land use in the emerging district and borough Local Plans mean that many of the existing ELAS may not remain suitable as a location for future waste development during the Plan period.

9.21   The county council must determine whether to identify ELAS to help guide development of different waste facility types and sizes towards areas that are compatible with waste management.

> Issue 20:
>
> Should the Waste Local Plan continue to identify Employment Land Areas of Search to help guide future waste management?
>
> a. Yes
>
> b. No, please explain
>
> c. Any other comments

9.22   Responses to this consultation will inform how best to plan for the provision of waste capacity taking into account the findings of the final Capacity Gap Report (as discussed in Chapter 8).

9.23   Should sites and/or areas be required in the WLP, a methodology will need to be developed to identify the most appropriate locations in the county. This may also require a Call for Sites exercise where landowners and waste operators are asked to put forward land which they would like to be included in the WLP.

9.24   Once potential sites and/or areas have been assessed through a site selection process, consideration will be given as to whether each of them should be identified as an Allocated Site or Area of Search. This will depend on the level of information and known degree of deliverability of the area/sites in question, as indicated by national planning guidance.

Criteria-Based Policies

9.25   An alternative or additional way to identify locations for waste management would be to strengthen the criteria based policies, against which individual applications for waste development will be determined.

9.26   The county council must determine whether strengthening the criteria-based policies in the emerging WLP could be used as an alternative to identifying locations for waste management or whether criteria-based policies should continue to be used in combination with identified locations.

> Issue 21:
>
> Should the County Council use criteria-based policies in the Waste Local Plan to determine whether a site is suitable for waste development?
>
> a.   Yes, instead of identifying sites and/or areas
>
> b.   Yes, in combination with identified sites and/or areas
>
> c.   No,
>
> d.   Any other comments

10   Chapter 10: Safeguarding

Related Objectives:

Obj 1   Promote the provision of well-designed and efficient facilities, that drive waste management practices up the Waste Hierarchy, and which reduce residual waste disposal;

Obj 2   Promote the location of well-situated waste facilities to ensure minimal harm to human health, and the protection of Hertfordshire's wildlife habitats, and natural, built and historic environments;

Obj 7   Cooperate with all partners in the county to encourage integrated county wide waste planning, aligning with other local plans;

Obj 8   Recognise the importance of the waste sector in the local economy as a generator of employment and its provision of infrastructure which supports businesses and communities; and

Obj 9   Work with all relevant waste authorities to manage the equivalent of the county's own waste arisings.

Issues 22-23:

What sites should be safeguarded in the Waste Local Plan?

Should the Waste Local Plan include consultation areas around safeguarded waste sites?

The Existing Approach to Safeguarding Waste Sites

10.1   The adopted Waste Local Plan (WLP) includes a policy on the safeguarding of sites. The policy safeguards sites where waste management facilities existed at the time of the WLP's adoption, where unimplemented planning permission existed for waste facilities, and where new facilities have been permitted since the adoption of the WLP.

10.2   The reason for safeguarding waste sites is to reduce the need for new sites to ensure that there is a strategic network of waste management provision within the county. The policy states that the county council as Waste Planning Authority (WPA) will oppose development proposals that would significantly

impact on the waste facilities operating under planning permission unless alternatives can be provided, or there is no longer any need for those facilities.

National Policy Requirements

10.3   The NPPF states the Local Planning Authorities should include strategic policies in their Local Plans to deliver the provision of waste management. The quality and capacity of waste infrastructure is mentioned within national policy as something that Local Planning Authorities should be working with other authorities and providers to assess.

10.4   In identifying sufficient opportunities to meet the identified needs of their area for the management of waste streams, the NPPW states that WPAs should work collaboratively and through the statutory Duty to Cooperate to provide a suitable network of facilities to deliver sustainable waste management[18]. In addition they need to consider the extent to which the capacity of existing operational facilities would satisfy the identified need when determining proposals for new or enhanced waste facilities.

10.5   The capacity of existing waste sites is monitored in the Authority's Monitoring Report on an annual basis. Waste sites can close quickly, either being located elsewhere or where businesses are no longer deemed to be viable. It is important that sites are not lost to other forms of development and are assessed on a frequent basis.

10.6   Other developments can impact upon the operation of existing waste facilities. This is particularly important to consider as the government's growth agenda is promoting a significant increase in house building, some of which may be proposed near to waste facilities. The NPPW recognises the positive contribution that waste management can make to the development of sustainable communities.

10.7   The NPPW seeks to ensure that the impact of non-waste related development on existing waste management facilities and on sites and areas allocated for waste management is acceptable and does not interfere with the efficient operation of waste facilities. It also states the need to ensure the design and layout of new residential and commercial development complements sustainable waste management[19].

10.8   The county council must determine the best approach to safeguard sites in the WLP to support the provision of a strategic network of waste management.

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[18] NPPW – Paragraph 3
[19] NPPW – Paragraph 1

Existing Approach

10.9   The count council could continue to implement a similar policy to the existing WLP whereby all operational and permitted waste sites are safeguarded. This would help to ensure that no waste management facilities are lost to other forms of development unnecessarily, and would seek to reduce the need for new sites to provide a strategic network of waste management across the county. With this option, the WLP would continue to safeguard all waste sites, including those that gain permission after the adoption of the WLP. These would be recorded annually in the Authority's Monitoring Report.

Safeguard with Exceptions

10.10 The locations and facility-types of existing waste sites were approved in line with the planning policies adopted at the time of each individual application. It is possible that because of changing circumstances in the county since permission was granted, or because of changes to policy and regulations, that not all existing operational waste facilities remain appropriate or in suitable locations.

10.11 Some waste sites may have a temporary planning permission and were not envisaged for long-term use. There are also waste sites that were never granted planning permission but have obtained Lawful Development Certificates to permit their ongoing operation due to the established nature of the land use.

10.12 If the emerging WLP does continue to safeguard waste sites, the policy could exclude certain waste sites from safeguarding. The exact exceptions would need to be confirmed at a later stage of Plan-production but could include sites with temporary permission, sites without formal planning permission and/or sites for waste streams which the county has sufficient capacity to manage the county's arisings.

Safeguard Strategic Sites

10.13 The WLP could be more specific about the waste sites it safeguards, and only safeguard the sites considered to be of strategic importance. This would require a clear definition for what constitutes 'strategic' and this definition could be based on a number of elements.

10.14 'Strategic' could refer to the size of a facility, for example facilities with an ability to manage a particular quantity of material each year. It could be based on the waste stream that a facility manages, for example a facility contributing to a shortfall of management capacity. Alternatively, a definition could be

based on the location of a facility (how close it is to the waste arisings) or a combination of a number of elements.

10.15 This would ensure that a more targeted approach to safeguarding was implemented in the WLP. The policy would focus on the key facilities in the county, without which the delivery of a strategic network of waste management facilities would not be possible.

No Safeguarding

10.16 A final option would be for the WLP not to safeguard waste sites. This option would follow the assumption that industry is willing to replace a waste site with another land use because it doesn't consider the existing site as necessary or the most viable use of the land.

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Issue 22:

What sites should be safeguarded in the Waste Local Plan?

Options:

a.   All waste sites, continuing the approach of the adopted safeguarding policy,

b.   All waste sites with certain exceptions, , please give details of potential exceptions,

c.   Strategic waste sites, please give details of what should be considered a strategic waste site,

e.   No waste sites,

f.   Any other comments

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Consultation Areas

10.17 If the WLP does contain a safeguarding policy, a series of waste consultation areas could also be included to offer additional protection to the waste sites included in the safeguarding policy.

10.18 As well as protecting waste sites directly from non-waste development at the same site, consultation areas would promote consultation between the district/borough councils and the county council, as WPA, for nearby non-waste developments that could indirectly impact the existing operational waste use. This could be where a proposed land-use is incompatible with the

established waste use and could prevent the continued use of land for waste management. The size of consultation areas would need to be determined at a later stage of Plan production. The size of the consultation area could depend on the type, size or location of the waste facility.

Issue 23:

Should the Waste Local Plan include consultation areas around safeguarded waste sites?

Options:

a.   Yes,

b.   No,

c.   Any other comments

11 Chapter 11: Policies Used to Determine Applications

Related Objectives:

Objs 1-10

Issues 24-27:

Does the list of strategic policy headings cover all the topics that should be included in the Waste Local Plan?

Does the list of development management policy headings cover all the topics that should be included in the Waste Local Plan?

Are the policy headings in Table 2 sufficient to meet any gaps in the policy areas identified?

Referring back to Chapter 5: Objectives, does the draft list of policy headings meet the objectives which will be included in the Waste Local Plan?

Strategic Policies

11.1 The Waste Local Plan (WLP) will contain a collection of strategic policies to aid the delivery or overall strategy of the plan, as defined by the vision and objectives. These policies cover the types of applications which could be received by the county council with the purpose of these policies to maintain Hertfordshire characteristics whilst balancing the need for local, waste management facilities.

11.2 Taking account of the findings of the policy audit in line with national policy and the need to provide a robust foundation to the WLP in order for Hertfordshire to achieve its vision and objectives, the list of strategic policy headings in Table 2 has been developed for review. The objectives (proposed in Chapter 6) that each policy relates to are shown in the right hand column.

Table 2 – Strategic Policy Headings	
Proposed Policy Heading	**Objectives Linked to**
Policy 1: Strategy for the Provision of Waste Management Facilities	1, 2, 3, 7, 8, 9
Policy 1A: Presumption in Favour of Sustainable Development	1, 2, 3, 5, 8, 10
Policy 2: Waste Prevention and Reduction	1, 4, 6, 7, 9
Policy 9: Sustainable Transport	3, 5, 10

Issue 24:

Does the list of strategic policy headings cover all the topics that should be included in the Waste Local Plan?

Options:

a.   Yes

b.   The list is too extensive and could be streamlined

c.   No - The list misses certain topics relevant to Hertfordshire – please specify

d.   Any other comments

Development Management Policies

11.3   Development management policies are included in the WLP to provide a framework that ensures waste facilities in Hertfordshire are delivered in an environmentally acceptable way.

11.4   These policies, along with the strategic policies, will be taken into account by county council planning officers when determining planning applications and will promote the planning system's presumption in favour of sustainable development. They will maintain a balance between the need for local, waste management facilities with the associated impacts on a wide spectrum of environment matters affecting people, the natural environment, transport and climate change.

People

11.5   Waste Management facilities can cause a number of general amenity issues, such as higher noise levels, dust and diminished air quality to local residents

and can have unavoidable negative impacts to heritage sites with archaeological interest.

11.6   The WLP will support applications looking to mitigate these impacts through the use of modern, efficient techniques, for example with quieter machinery and well-designed acoustic plans or management practices to reduce the amounts of dust being released into the air or onto nearby roads.

11.7   The WLP will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation prior to granting planning permission to the relevant authority.

Natural Environment

11.8   The natural environment may be the recipient of harm from waste management facilities with a wide range of potential impacts to biodiversity, landscape, watercourses and soils.

11.9   Planning applications will be assessed to ensure that any permitted operations will not be susceptible to flooding and will not increase the risk of flooding. The WLP will require that individual site specific Flood Risk Assessments are submitted for all proposals with an Environmental Statement which assesses significant adverse impacts on water quality and a river management plan, should the proposal affect a relevant water body. Sustainable Drainage Plans must also be produced for the approval of new drainage systems in new developments or redevelopments.

11.10   The WLP will ensure proposals consider the habitat and species that may be affected within the planned area of development and should contribute to the natural and local environment by minimising the impact on biodiversity and providing net gains where possible.

11.11   The WLP will contain a criteria-based approach against which proposals for developments on or affecting protected wildlife, geodiversity sites or protected landscapes will be judged. Plans should highlight the importance of valued landscapes and the special characteristics of protected landscapes including Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, Ancient Woodlands and National Parks.

Transport

11.12   The WLP will encourage proposals to consider sustainable transportation of waste in order to reduce the impacts of transport on local infrastructure and climate change.

Climate Change

11.13 The WLP will encourage a low carbon future by enforcing all proposals to demonstrate how effective measures to minimise and be resilient to the future impacts of climate change have been incorporated into the design and location of developments.

11.14 This will ensure that developments will not promote climate change through their operations and also that the developments will not be susceptible to the environmental alterations that climate change may cause.

11.15 Measures could include, but are not be limited to, renewable energy, minimising greenhouse gas emissions, on-site water efficiency, reducing flood risks, restoration of site and after-uses and secondary aggregates.

Policy Headings

11.16 Based on the requirements of national policy to cover the issues described above, the list in Table 3 of development management policies to be included in the WLP has been developed for review with the objectives that each policy relates to shown in the right hand column.

Table 3 - Development Management Policy Headings	
Proposed Policy Heading	**Objectives Linked to**
Policy 3: Energy and Heat Recovery	1, 6
Policy 4: Landfill and Landraise	1, 2
Policy 5: Safeguarding of Sites	7, 8
Policy 6: Green Belt	2,
Policy 7: General criteria for assessing planning applications outside of identified locations	1, 2, 3, 9
Policy 8: Waste Parks/Combined Facilities	1, 2, 5, 9
Policy 9: Sustainable Transport	2, 5
Policy 10: Climate Change	1, 4, 6, 10
Policy 11: General criteria for assessing Waste Planning Applications	1, 2, 3, 9, 10
Policy 12: Sustainable Design, Construction and Demolition	1, 2, 3, 4, 5, 6, 8, 10
Policy 13: Road Transport and Traffic	2, 3, 5
Policy 14: Buffer Zones	2
Policy 15: Rights of Way	2

Policy 16:Soil, Air and Water	2
Policy 17: Protection of Sites of International and National Importance	2
Policy 18: Protection of Regional and Local Designated sites and areas	2, 7
Policy 19: Protection and mitigation	2, 7, 10
Policy 20: Monitoring and enforcement	7

Issue 25:

Does the list of development management policy headings cover all the topics that should be included in the Waste Local Plan?

Options:

a. Yes

b. The list is too extensive and could be streamlined

c. No - The list misses certain topics relevant to Hertfordshire – please specify

d. Any other comments

Policies Review

11.17 The WLP will contain a collection of policies to ensure that the requirements of national policy, the vision and objectives of the WLP, and thereby the higher-level corporate vision for Hertfordshire County Council, are met whilst providing planning officers with a framework against which they can assess submitted planning applications.

11.18 An audit of the policies contained in the existing WLP recognised that a number of current policies would require moderate rewording and that brand new policy topics were required in a couple of instances for the WLP to be considered fully up to date and compliant with national policy.

11.19 A brief overview of the required amendments and additions to the existing WLP's policy from the audit is provided in Table 4:

Table 4 – Required Amendments to Existing Policy	
Amendment	**Details**
Waste Consultation Areas	It is difficult to find suitable sites for waste management facilities so once they have been developed, it is important to safeguard them and ensure that non-waste development doesn't have an impact on their operation. All planning authorities should bear this in mind. In order to implement this, a new policy is proposed to trigger consultation with the county council for new built development in areas near to existing waste facilities.
Landfill exploitation	Traditional forms of waste disposal meant that all waste was mixed together and deposited in a hole in the ground. This practice of 'landfill' is now seen as a last resort for waste management. The disposal of waste in this way may mean that there are valuable resources in old landfill sites in the county. There may need to be a policy to deal with any proposals which may come forward.
Secondary and Recycled Aggregate facilities/sites	The production of secondary and recycled aggregate involves the processing of construction, demolition and excavation waste into a useable product. This has implications for both the minerals and waste planning functions of the county council. In order to further encourage the reuse of inert material as a resource, a policy may be needed to deal with any proposals which may come forward.
Golf courses, leisure facilities and inert waste recovery	Hertfordshire has received a number of planning applications for the development of golf courses and other outdoor leisure activities. These often include the importation of a significant amount of inert waste material for landscaping and engineering works. A policy may be needed to deal with future proposals which may come forward.
Land remediation	Inert waste operations could be used for the remediation of areas of derelict land (including poorly restored mineral sites). It may be beneficial to include a policy to promote this activity.
Capacity Requirement	The adopted MLP lays out the identified capacity and capacity gaps of the county's waste management facilities. It could be

	beneficial to include a policy to promote the development of waste sites to meet shortfalls in capacity for specific waste streams.
Enclosed and open facilities	Most modern waste facilities can be enclosed within a building. The exceptions to this are composting sites which are in the open. Similar issues would need to be taken into account for either open or enclosed facilities; however, it may be necessary to develop specific policies to further guide waste management facilities.
Extension of Time	The county council has received a number of planning applications for the extension of time of existing waste operations. A policy may be required to deal with any proposals that come forward for extensions rather than new facilities.

11.20 At this stage of the WLP review process, the county council does not need to finalise the content and wording of policies and wishes to confirm the topic headings for policy areas to ensure that it includes all the issues relevant to Hertfordshire in the subsequent stages of consultation prior to the adoption of the new local plan.

> Issue 26:
>
> Are the policy headings in Table 2 sufficient to meet any gaps in the policy areas identified?
>
> Options:
>
> a.   Yes
>
> b.   The list is too extensive and could be streamlined
>
> c.   The list misses certain topics relevant to Hertfordshire
>
> d.   Any other comments

Waste Site Allocations Policy

11.21 As part of the review, the county council will review the need for adopted policy WSA 2: Applications for Waste Management Development on Allocated Sites and Employment Land Areas of Search. The need will be determined

based on the identification of sites and/or areas taking account of the responses to the issues in Chapter 9: Waste Sites and Areas.

Objectives

11.22 The policies of the WLP should be guided by the overall approach to waste planning set out by the vision and objectives of the Plan. The policies should ensure that the objectives of the Plan are met which should ensure that the vision of the Plan is achieved.

Issue 27:

Referring back to Chapter 5: Objectives, does the draft list of policy headings meet the objectives which will be included in the Waste Local Plan?

Options:

a.   Yes

b.   No

c.   Any other comments

12   Chapter 12: Sustainability Appraisal

Related Objectives:

    Objs 1-10

Issue 28:

Are the Objectives of the Sustainability Appraisal appropriate as a framework to determine the sustainability of the Waste Local Plan?

Sustainability Appraisal

12.1   Under national policy, it is mandatory for a Waste Local Plan (WLP) to undergo a Sustainability Appraisal to systematically appraise the social, environmental and economic effects of the plan. The Sustainability Appraisal ensures that decisions are made that accord with the planning system's presumption in favour of sustainable development.

12.2   At this early stage of the plan preparation process, the county council must determine the objectives of the Sustainability Appraisal that the WLP will be subject to throughout the preparation process.

12.3   The objectives form a key component of the Sustainability Appraisal as they set out the framework that the effects of proposed options, policies and sites will be assessed against during each stage of the preparation of the WLP.

Land Use Consultants – Sustainability Appraisal Scoping Document

12.4   Land Use Consultants (LUC), an external consultancy firm, has been instructed to undertake the Sustainability Appraisal for the WLP review on behalf of the county council.

12.5   Following feedback at a Stakeholder Event on 23 August 2017, LUC developed the Sustainability Appraisal of the Hertfordshire Waste Local Plan Scoping Report (2017) which has been published as a supporting document for the Initial Consultation.

12.6   The report contains baseline information specific to Hertfordshire and the objectives of the Sustainability Appraisal that are proposed for the Plan-appraisal process. The objectives are presented as a series of headline

objectives covering particular themes with sub-objectives providing further detail on each issue.

12.7   As part of this consultation, the report has been provided to the three statutory consultees, Natural England, Historic England and the Environment Agency, to seek their views in relation to the scope and level of detail to be included in the Sustainability Appraisal.

12.8   In order to receive a wider collection of representations than those from the statutory consultees, the proposed headline objectives are included below for readers to provide feedback regarding the proposed focus of the appraisal.

Draft Sustainability Appraisal Objectives

Economy and Employment
1. Support, maintain or enhance the development of the economy

Communities
2. Protect and improve the health of the people of Hertfordshire
3. Reduce the incidence of crime and anti-social behaviour associated with waste

Transport
4. Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the County

Resource Consumption and Climate change
5. Move treatment of waste up the Waste Hierarchy
6. Reduce Hertfordshire's contribution to climate change through appropriate mitigation measures
7. Promote effective restoration and appropriate after use of sites

Historic Environment
8. Protect and enhance the historic environment

Natural Environment
9. Restore, enhance and expand county biodiversity and geodiversity
10. Protect, enhance and restore the landscapes and townscapes of Hertfordshire, including its rural areas and open spaces
11. Protect and enhance the quality and quantity of watercourses and water bodies, and maximise the efficient use of water
12. Reduce the vulnerability of Hertfordshire to the effects of climate change including risk of flooding
13. Minimise noise, light, and air pollution
14. Protect and enhance soil and mineral resources

Issue 28:

Are the Objectives of the Sustainability Appraisal appropriate as a framework to determine the sustainability of the Waste Local Plan?

Options:

a.   Yes

b.   No

c.   Any other comments

13   Chapter 13: Summary

13.1   Responses can be submitted either through the council's **online consultation portal (Objective)** or by sending completed response forms, available from the consultation portal, to us either by email or letter.

13.2   A full list of options for response submission:

Online Consultation Portal: http://hertscc-consult.objective.co.uk/portal
Email response forms: waste.planning@hertfordshire.gov.uk
Address for printed forms: Minerals and Waste Policy Team, Spatial Planning and Economy, CHN 216, Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN.
Phone no. for queries: 0300 123 4040

13.3   This initial consultation paper is being published for consultation for an eight-week period starting at **9am on 5 February 2018** and ending at **5pm on 30 March 2018**. Please ensure that your responses reach us by the closing date.