

Statement of case for a new Recycling Centre in Hemel Hempstead

Date: August 2025



(Photo: Ware Recycling Centre, Hertfordshire)



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1 EXECUTIVE SUMMARY

1. This representation is made by Hertfordshire County Council (HCC) as a service provider in its role as the statutory Waste Disposal Authority for Hertfordshire including the area covered by the emerging Local Plan.
2. The emerging Dacorum Local Plan¹ (Reference in Pillar 2 – Integrated Neighbourhoods (F)) and St Albans Local Plan² (Pillar 2 – Integrated neighbourhoods(G)) refer to the “Delivery of Key Projects including a Household Waste Recycling Centre and Local Authorities Depot facilities to meet the needs of new and existing communities...”
3. The need for a new expanded facility of appropriate capacity is recognised in the Local Plan representations made to St Albans City and District Council (SADC) and Dacorum Borough Council (DBC) but is not addressed in terms of allocating a potential site.
4. HCC believe the Local Plans require modifications to provide certainty about the requirement for the delivery of this infrastructure through the identification of a site and recommend to the Inspector the following modifications:

Proposed modifications:

- A. In the SADC Local Plan, Hemel Garden Communities – Broad locations, site references H1, H2, H3 and H4. Add in under “Key development requirements - Integrated neighbourhoods”:
A 1-hectare recycling centre, with suitable contributions to deliver infrastructure that meets the needs of both existing and future communities in either North or East Hemel Hempstead, supported by appropriate road access.
- B. In DBC Local Plan, HM01 - North Hemel Hempstead Growth Area – Add into the “key development and land use requirements”:
A 1-hectare recycling centre, with suitable contributions to deliver infrastructure that meets the needs of both existing and future communities in either North or East Hemel Hempstead, supported by appropriate road access.
- C. In the Proposal maps include reference to an opportunity area for potential redevelopment in Cupid Green for a co-located waste depot and recycling centre.

¹ Dacorum Local Plan to 2041, Pre-Submission version, November 2024

² St Albans City & District Council Draft Local Plan 2041, Regulation 19 Publication, September 2024

Given operational requirements for new updated waste and recycling facilities, the Cupid Green employment area has the potential for redevelopment to provide a location for a new co-located waste depot and recycling centre.

5. These proposed modifications will ensure that it, and any successor statutory waste disposal authority created under local government reform, is able to adequately manage domestic waste arising from expanding growth in both St Albans and Dacorum and in so doing achieve delivery of the waste hierarchy and climate change objectives.
6. Failure to plan positively for such a new expanded facility, will exacerbate the problems and deficiencies with the existing RC site in Eastman Way. The site is owned by HCC until such time as it vacates, where it reverts to DBC. DBC are the major landowner for the majority, if not all the adjoining land. The site would be available for redevelopment/alternative employment use on cessation of the existing waste use.
7. Failure of the plan to assist in delivering an RC would also leave HCC as Waste Disposal Authority (or its successor in title) with little option but to acquire a site on the open market or to put forward very special circumstances to justify provision of a site in the Green Belt. HCC considers that an allocation of an appropriate size and located site needs to be identified in the Local Plans.
8. The Recycling Centre Annex to the Local Authority Collected Waste Spatial Strategy (Updated April 2022)³ (LACW RCA Annex) has concluded that the existing Hemel Hempstead Recycling Centre (HHRC) site is significantly unsuitable for continued use owing to limited size. As such, there is a clear and pressing need to identify and deliver a new HHRC facility to support the existing population and accommodate new growth proposed around Hemel Hempstead.
9. Previous site search exercises were conducted in 2016⁴ and 2019^{5,6}, prompted by the inadequacy of the current site to accommodate the area's projected growth and operational demands. This paper builds upon those earlier studies, updating the evidence base and expanding the scope to include potentially suitable locations within the emerging Local Plans of both Dacorum Borough Council (DBC) and St Albans City and District Council (SADC).

³ Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex, Updated April 2022.

⁴ Hemel Hempstead HWRC Site Search, May 2016, Lambert Smith Hampton

⁵ Land Search Schedule – Developable land (approx. 1 hectare) for a Household Waste Recycling Centre, near Hemel Hempstead, May 2019, Carter Jonas

⁶ Hemel Hempstead HWRC - Review of sites identified by Carter Jonas identified by Carter Jonas Availability Schedule for 1ha of land August 2019

10. Through this high-level assessment, five sites have been identified as potentially suitable for the development of a replacement HHRC. These locations merit further detailed investigation and technical evaluation to determine their viability and alignment with strategic infrastructure objectives.

Table 1: Consolidated short list of potentially suitable sites

Ref	Address	Timescales	Site type
RC20	Cupid Green Depot, Redbourn Road, Hemel Hempstead, HP27BA	Uncertain, no published DBC position	Brownfield
RC140 and RC027	East Hemel Hempstead, HP2 7LF – Referenced H3 in the Local Plan	Within the SADC plan period	Part built
RC138	North Hemel Hempstead, AL3 7AU – Referenced H1 in the Local Plan	Within the SADC plan period.	Greenfield
RC141	East Hemel Hempstead (South), HP2 4PA. Referenced H4 in the Local Plan. RC017 - Land lying to the northeast of The Orchard, Westwick Row, HP2 4TZ is part of this site.	Within the SADC plan period	Greenfield
RC112	North Hemel Hempstead Growth Area.	2032/33.	Greenfield

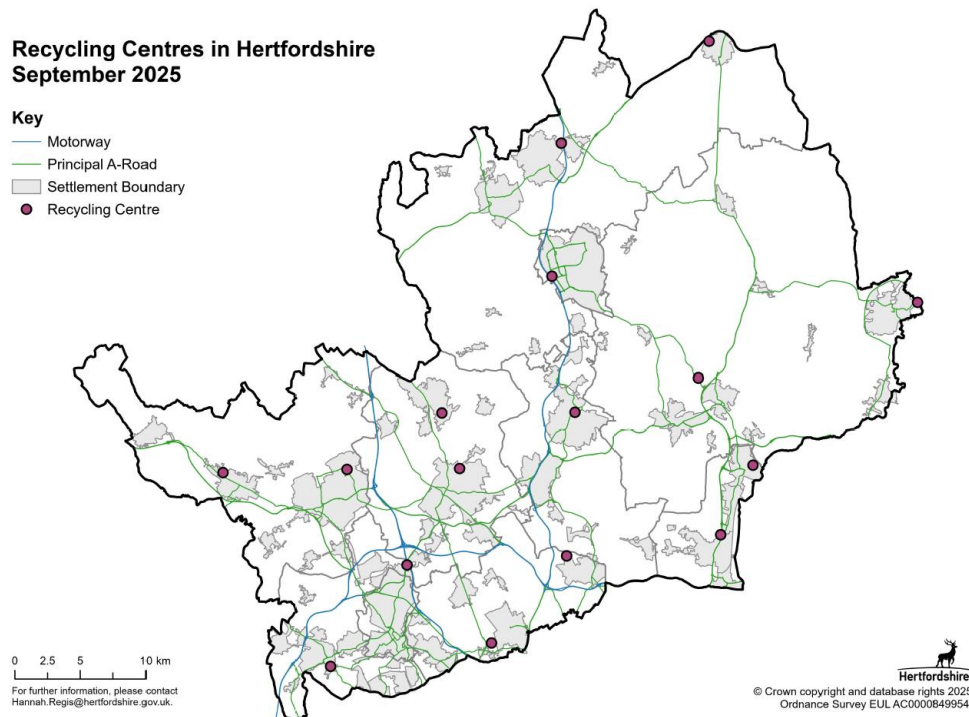
2 INTRODUCTION

Strategic Context

11. With growing global emphasis on sustainable development and resource efficiency, strengthening local recycling capabilities is essential. As the designated Waste Disposal Authority (WDA) for Hertfordshire, Hertfordshire County Council (HCC) holds statutory responsibilities under the Environmental Protection Act 1990 to provide Recycling Centres (RCs) and manage local authority collected waste. A flexible and modern RC network is vital to delivering the Government's Resources and Waste Strategy, which promotes waste minimisation, circular economy principles, and improved material recovery.
12. The RC service plays an important role in moving waste up the waste hierarchy. The service complements the kerbside recycling service provided by the WCAs by enabling residents to deposit additional larger waste types and excess waste for reuse, recycling or disposal.

Current Provision

13. HCC currently operates 16 Recycling Centres across the county, enabling residents to responsibly dispose of household waste. These facilities are governed by Section 51 of the Environmental Protection Act 1990 and form the backbone of the county's waste infrastructure.

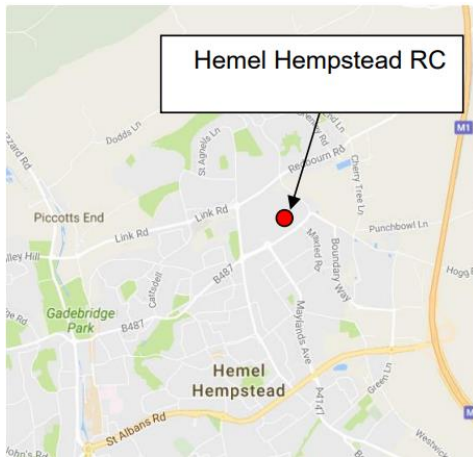


(Figure 1: Hertfordshire's Recycling Centres)

Existing Hemel Hempstead Recycling Centre (HHRC) at Eastman Way

14. The HHRC, located off Eastman Way, is open 5 days a week from 10am to 6pm and is closed on Christmas Day, Boxing Day and New Years Day.





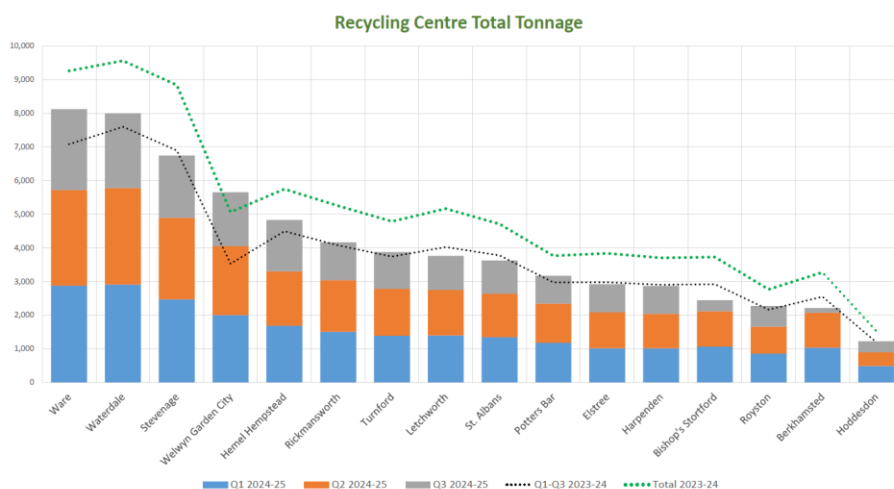
Map: Location of the existing HHRC

Existing site and surrounding uses



(Source: Google map August 2025)

15. The graph below shows for that for the first three quarters of 2024/25 the HHRC received the most tonnage of all the centres that are open 5 days a week. The graph also highlights that waste volumes have increased when compared to the same period in 2023/24. During 2024/25 there were circa 124,000 visits to the centre over the period.



16. The centre is popular with residents who give it a four-star review on google because of the helpful, polite and kind staff who work there. The reviews also highlight the frustration that residents feel with the layout of the site, the number of steps to climb when disposing of waste and the long wait time when the centre must close during opening hours for container exchanges.

- Issues with current provision

17. The LACW RCA Annex sets out an assessment of the current RC network and identifies the Waste Disposal Authority's (WDAs) requirements for a robust service that can fulfil future demand.

18. An assessment of the suitability of HHRC conducted in 2019/20, and reviewed in April 2025, identified the centre as Highly Unsuitable. When determining the suitability of a recycling centre several aspects are considered, including condition of the facility, container capacity, parking capacity and the centres short, medium and long-term viability.

Centre	Visitor numbers 2019/20	Condition (*)	Container & Material Capacity	Parking Capacity (**)	Location (***)	<5 yr Suitability	5-10y suitability	>10 yr suitability	Overall Rating	Development potential of the existing centre
Hemel Hempstead	112,902	1	1	1	2	1	1	1	8	1

* Integral infrastructure e.g. welfare facilities, drainage, hardstanding

** Number of spaces for service users

*** Centre catchment area and ease of access

- Condition of site

19. As identified in the above table, the condition of the centre is very poor. While road markings are regularly refreshed, the jointed concrete surface means that

they deteriorate very quickly. The restricted space around containers makes it more difficult and time consuming to clean up split waste and general debris.

20. The site is not split level, meaning that users must carry waste up steps to dispose of it. There is no clear segregation of vehicles from pedestrians and while signage is as clear as it can be it is not always easily visible to the public.

- Waste segregation issues

21. There is insufficient space (Investigations have identified that expansion of the existing facility is not possible as remediation of neighbouring land would be too costly) on the site to separate out some waste streams for recycling or to introduce new waste streams e.g. coffee pod recycling. Not being able to separate out waste streams can mean that the waste type will cost more to dispose of or must be placed with the non-recyclable waste (residual) container which is then sent to energy recovery (incineration) instead of recycled into new materials.

- Existing capacity issues – leading to frequent closures

22. Restricted operational space means it has not been possible to introduce compaction equipment. This equipment would maximise the capacity of containers by ensuring as much material as possible can fit into a container before it is taken off site and replaced with an empty container thereby reducing the number of times the container needs to be exchanged and the number of times the centre needs to close for servicing. The high level of tonnage going through the centre and the lack of compaction equipment means the centre needs to close during its opening times as there is not enough room to safely exchange containers with the public on site. High demand means that this 40 – 60-minute process happens regularly, which causes severe queuing on the local road network, often resulting in vehicles backing up onto the A4147 roundabout.

- Complaints

23. Complaints about the centre mostly focus on the frequency of closures to exchange containers and the lack of capacity to dispose of waste and recycle items at the centre as the containers are always full. Having to carry heavy items such as radiators up steps is also mentioned. The most recent google review identifies that the user could not dispose of non-recyclable waste, cardboard or metal as the containers were full.

- Layout

24. The most efficient and effective layout has been utilised. It is not possible to satisfactorily expand or reconfigure the centre within the existing footprint to accommodate compaction equipment or introduce more car parking spaces. The low number of car parking spaces makes the centre too small to adequately deal with the level of demand from residents at peak times which causes long queues onto the industrial estate.

- Population growth – increased visits

25. Recycling centre catchment areas reflect ease of access for residents and do not consider council boundaries, see image below. This is demonstrated by the catchment area served by HHRC which falls within the area of St Albans Council and Three Rivers Council as well as Dacorum Council. Projected population growth within this catchment area alone has increased by circa 40% since the LACW RCA Annex was published in 2022 from 101,759 to 142,228, an increase of 40,469.

26. This level of population growth will exacerbate the problems experienced by current service users.



- Proposed recycling centre provision

27. The LACW RCA Annex clearly sets out the benefits to residents of providing an improved recycling centre. Purpose built centres incorporate features that would address the issues experienced by residents and aid the council in ensuring that taxpayer's money is well spent.

28. Features include:

- A running lane to enable traffic to be kept off the road network.

- A segregated servicing area to enable compaction of containers and their exchange while keeping the centre open.
- Increased space for more waste items to be segregated.
- A split-level design to reduce carrying materials up steps.
- Clear and large signage to direct site users to the right containers, speeding up their visit.
- Safety features such as the segregation of pedestrians and heavy goods vehicles, clearly marked and carefully designed pedestrian walkways and barriers and bollards to protect residents from vehicles.
- Reuse shops to divert useable items away from the waste stream and provide residents with quality affordable items.

- Future role of the recycling centre

29. There are several factors that will impact the future use of the HHRC. They include, but are not limited to, new waste legislation, changing regulation, housing growth, the sustainability agenda, the economy, the local planning process, planning restrictions and changes to Waste Collection Authority (kerbside, bulky waste and clinical waste collections) and WDA service provision.

- Increased waste segregation requirements

30. Recently the Environment Agency introduced new regulations to segregate items containing Persistent Organic Pollutants (POPs). These so called “forever chemicals” stay in the environment and never breakdown. The WDA is now required to designate a container at each recycling centre for the separate collection of upholstered furniture which may contain POPs. There is potential for the expansion of the regulations that would require the separate collection of other waste items that contain these “forever chemicals”. Where this does come in, smaller sites such as the current Hemel site will have to reduce the number of materials collected there to accommodate any mandated separate collection requirements, adding cost and inconvenience to residents.

- Increased waste recycling targets

31. The government target of recycling 65% of municipal waste (waste generated by households, as well as similar waste from commercial, industrial, and institutional sources that is collected and managed by local authorities) by 2035 was established in the July 2020 Circular Economy Package. Previously the recycling rate target was set at 50% of household waste. The Circular Economy Package aims to reduce waste and move the UK towards a circular economy, where resources are retained in circulation for as long as possible. To achieve this, it will be necessary to collect and store a wide range of materials separately to ensure

they are not contaminated and can be reused and/or recycled.

- Increased financial burden

32. From January 2028 the WDAs contracted Energy Recovery Facilities for residual waste will become subject to the UK's Emission's Trading Scheme, where an additional cost for fossil derived waste sent to the facilities for incineration will be applied. To reduce this financial burden on the taxpayer, the WDA will need to operate recycling centres that have sufficient space to maximise the diversion of recyclable materials and mitigate the financial burden so far as possible.

Planning for Replacement

33. Historic site searches along the A414 corridor have not yielded viable alternatives. However, both SADC and DBC has identified a need for a new HHRC in their respective emerging Local Plans.

34. The LACW RC Annex, prepared by HCC as WDA, provides a detailed assessment of the RC network and outlines future infrastructure needs. Originally issued in 2017 and updated in April 2022, the LACW RCA Annex incorporates 2019/20 data to avoid anomalies caused by the COVID-19 pandemic. Following the transfer of RC operations to HCC in October 2020, the facilities were rebranded to emphasize recycling over waste disposal.

35. In 2019/20, Hertfordshire's RC network handled approximately 76,700 tonnes of waste and received over 1.6 million visits. To meet anticipated reuse and recycling targets and accommodate housing growth, strategic investment in the RC network is essential. The most recent data shows that the centres are under significant pressure and now manage 85,000 tonnes of waste and receive approximately 2 million visits per annum.

Future Needs and Growth Corridors

36. The Hertfordshire Infrastructure and Funding Prospectus (2018-2031)⁷ identifies three major economic growth corridors aligned with the A10/M11, A1(M), and M1 routes, with key east-west links via the A41, A414, and A120. A significant proportion of planned housing growth lies within 3 miles of these corridors, placing increased demand on RCs in Ware, St Albans, Hoddesdon, and Hemel Hempstead.

37. Given the limitations of the existing HHRC and the scale of projected growth, a new, fit-for-purpose facility is urgently required. Investment in modern RC infrastructure aligned with strategic transport corridors and local development

⁷ Hertfordshire Infrastructure & Funding Prospectus, 2018-2031, Aecom.

plans will ensure Hertfordshire remains resilient, sustainable, and well-equipped to meet future waste management challenges. A new RC is sought early in the plan period to mitigate the impacts of growth in HH.

Specification for New Recycling Centre

38. To meet future demand and align with strategic infrastructure goals, the Council has outlined the following requirements for the new HHRC:

- **Size:** A minimum of 1 hectare for the recycling 'super site' is required. This scale enables efficient site layout, increased throughput, and enhanced separation of recyclable materials. It also allows for safe segregation of pedestrian and vehicle movements and avoids operational disruptions during servicing and container exchange. A shared site with DBC at Cupid Green could require a slightly smaller area.
- **Form:** The site should feature a concreted surface with gentle gradients and protective canopies. A split-level design is preferred to facilitate easy waste disposal without the need for steps, although final design will depend on site topography and access arrangements.
- **Location:** The site should be adjacent to a main road to ensure efficient access and reduce HGV traffic through residential areas. Proximity to shops and services is desirable to encourage trip chaining and support sustainability. Where necessary, a transport assessment will be required.
- **Compliance:** The site must meet all relevant environmental and regulatory standards.
- **Suitability:** Recycling centres are considered compatible with a wide range of land uses and are generally regarded as 'good neighbours⁸.'
- **Co-location:** Co-location with other waste-related facilities such as Waste Transfer Stations, Waste Collection Authority depots, and other local authority services is preferred. This approach offers operational efficiencies and environmental benefits, including reduced vehicle mileage. Additional space for a reuse facility and repair workshop with dedicated parking would further support sustainability goals.
- **Access and Traffic:** The site should support pedestrian access and be well-connected to sustainable transport modes. It must accommodate expected traffic volumes, with on-site queuing capacity to prevent congestion on surrounding roads. Secure, covered cycle parking should be provided to promote active travel.
- **Drainage:** Connection to the foul sewerage system is essential.
- **Services:** The site must be equipped with telephone, electricity, and potable water supplies to support office and welfare facilities.
- **Sustainability:** Incorporation of sustainability features such as photovoltaic panels is encouraged.
- **Acoustics:** Noise mitigation measures, including vegetation buffers or acoustic fencing, should be considered.
- **Design:** High-quality design features such as soft landscaping, timber cladding, green walls, and green roofs should be included particularly if the

⁸ Appendix 2: Providing Service for Residents; Recycling Centres in the Local Authority Collected Waste Spatial Strategy Recycling Centre Annex, Updated April 2022, sets out examples of where recycling centres have been successfully designed and integrated into the local setting.

site is within the Green Belt. Structures should be designed to remain below the surrounding tree line where possible, as exemplified by the Witchford Recycling Centre.

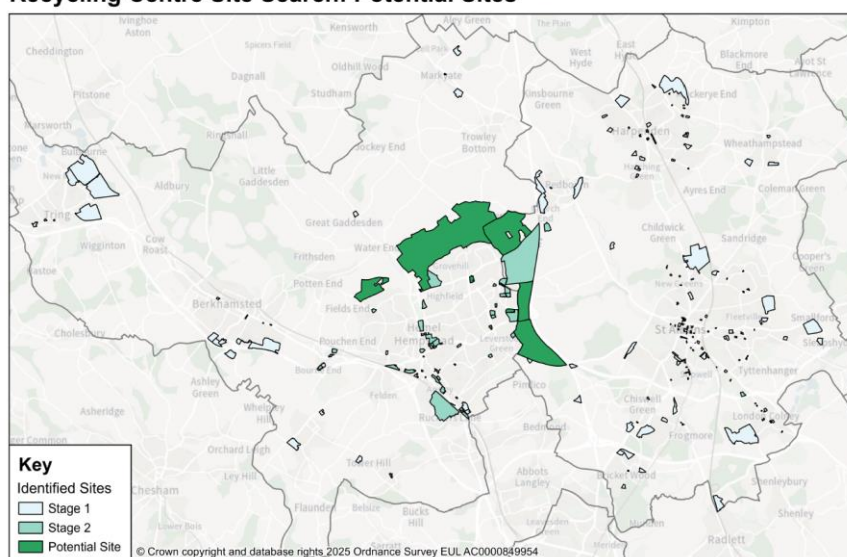
39. Further information regarding relating to the design of HCC's services are set out in the HCC Service Provision and Place-Making Guide⁹ The guide offers a combination of specification requirements, locational criteria and design principles to ensure that facilities being provided alongside growth are fit-for-purpose and have a positive impact on the places being created.

3 SITE SEARCH

40. A comprehensive site search was undertaken by HCC officers using a range of sources:

- Lambert Smith Hampton site search (May 2016)
- Carter Jonas site searches (May and August 2019)
- Existing waste sites at Eastman Way and Cupid Green, Hemel Hempstead
- Maylands Masterplan sites
- DBC and SADC Brownfield Land Registers
- DBC and SADC Regulation 19 Local Plan allocations
- HCC land assets in Hemel Hempstead

Recycling Centre Site Search: Potential Sites



(Source: HCC GIS mapping of potential sites)

41. Stage 1 Assessment (See Appendix 1 for further details)

- 256 sites were reviewed
- Sites under 1 hectare were excluded
- Sites not located within or on the edge of Hemel Hempstead were rejected

⁹ Service Provision and Place-Making Guide (Adopted February 2024)

42. Stage 2 Assessment (See Appendix 1 for further details)

- 59 sites were assessed against key constraints using 250m buffers, including:
 - Green Belt (GB)
 - Conservation Areas (CA)
 - Areas of Outstanding Natural Beauty (AONB)
 - Local Nature Reserves (LNR)
 - Scheduled Ancient Monuments (SAM)
 - Flood Zones (FZ)
 - Public Rights of Way (PROW)
 - Proximity to road access
- Green Belt sites were considered viable and were justified by infrastructure need particularly in support of Hemel Garden Communities (HGC) growth. The SADC Green Belt Review¹⁰ proposes removal of LEHH, supporting this rationale.
- Sites within CA, AONB, LNR, and SAM were rejected based on sensitivity.
- Annex 3: Flood risk vulnerability classification of the Framework states that Waste treatment (except landfill* and hazardous waste facilities) and buildings used for offices are a 'less vulnerable' classification.
- Impacts on PROW can be mitigated through redirection strategies.
- A simple test of whether the site was adjacent to a road was applied to determine access.

43. Following the tranche 2 assessment (Applying a 250m buffer around key constraints and subsequent site visits), a total of 13 sites were shortlisted for further consideration in the following table:

¹⁰ St Albans Stage 2 Green Belt Review, Final Report June 21023, Arup

Table 2: Short list of sites

Ref	Source & reference	Site address	Size (Ha)	Current use of site	Constraints	Adjacent to road?	Comments	RAG
RC20	Existing waste site	Cupid Green Depot, Redbourn Road, Hemel Hempstead, HP27BA	1.15	Waste disposal.	No	Yes	Limited site size and constrained by uses surrounding it, but there is the potential to redevelop this site, Eastman Way, car wreckers' yard and the wider area.	Potential
RC106	DBC Brownfield Land Register BLR 035	Kier site, Maylands Avenue	1.1	Scrubland.	No	Yes	RC106 and RC004 are the same site. Road access has been provided through the middle of the site which constrains the developable area.	No potential
RC112	DBC LP allocation HM01	North Hemel Hempstead Growth Area	455.28	Greenfield or agricultural land.	Yes – GB, CA, AONB, LNR, FZ, PROW.	Yes	Large site so possible to avoid constraints. Large site so possible to avoid constraints. Located on outskirts of HH away from M1. This parcel is expected to come forward from 2032/33.	Potential
RC123	DBC LP allocation HM12	Plots 2/3 Kier Park, Maylands Avenue	1	Brownfield	No	Yes	Limited site size. Located in Maylands/central HH. Road access provided through the middle of the site for the hotel and hot food uses likely under size requirements. This parcel is expected to come forward from 2026/27.	No potential
RC124	DBC LP allocation HM13	Polehanger Lane	51.94	Greenfield	Yes – GB, PROW.	Yes	Located on outskirts of HH away from M1. Large site so possible to avoid constraints. This parcel is expected to come forward from 2031/32. Outline application now received for this site.	No potential
RC138	SADC LP allocation H1	North Hemel Hempstead, AL3 7AU	154.07	Greenfield	Yes – GB, SAM, PROW.	Yes	Located on outskirts of HH away from M1. Large site so possible to avoid constraints. This parcel is expected to come forward within the SADC plan period.	Potential
RC140	SADC LP allocation H3	East Hemel Hempstead (Central), HP2 7LF	53.42	Greenfield	Yes – GB, PROW	Yes	RC140 and RC027 are the same site. Large site so possible to avoid constraints. Located on outskirts of HH. But access to J8/M1. This parcel is expected to come forward within the SADC plan period.	Potential
RC141	SADC LP allocation H4	East Hemel Hempstead (South), HP2 4PA	142	Greenfield	Yes – GB, PROW	Yes	Large site so possible to avoid constraints. This parcel is expected to come forward within the SADC plan period.	Potential
RC017	Carter Jonas site search CJ-H	Land lying to the northeast of The Orchard, Westwick Row, HP2 4TZ	29.75	Greenfield	Yes – GB, PROW.	Yes	Part of RC141. Large site so possible to avoid constraints. Located on outskirts of HH. But access to J8/M1.	Potential
RC027	Maylands Masterplan MM-7	East Hemel Hempstead	60	Greenfield/sm all part built on	Yes – GB, PROW.	Yes	RC140 and RC027 are the same site. Large site so possible to avoid constraints. Located on outskirts of HH. But access to J8/M1. This parcel is expected to come forward within the SADC plan period.	Potential
RC028	Maylands Masterplan MM-8	Boundary Way Caravan Site	4	Caravan site & storage	No	Yes	Located in Maylands/central HH. Possible redevelopment opportunity but currently used as a caravan site. Not suitable as site is almost wholly within the Buncefield blast zone.	No potential
RC004	LSH-4	Car Park and Meadow, Nash Mills Meadows, Apsley, HP3 9XF	1.841	Part built out	No	Yes	RC106 and RC004 are the same site. Part built out site reducing the potentially developable area. Located on outskirts of HH away from M1.	No potential

Timeline for site search work

44. The timeline for the site search work for a new recycling centre is set out below in the following table.

	Action	Timescale
1	In 2015 the option of using adjacent land to expand the recycling centre was investigated. This land was found to be heavily contaminated by its current occupiers over an extended time, making expansion prohibitively expensive.	2015
2	Lambert Smith Hampton site search undertaken.	May 2016
3	Carter Jonas site search of the wider area was conducted which identified one area on Breakspear Way as suitable. A multi-disciplinary team concluded the following: A new HWRC on this site can be developed from the outset and master planned into the overall broad location. There are unlikely to be contamination issues within the site, as it is currently agricultural land. Based on there being no fundamental highway concerns and flooding issues, this remains the best site for a new HWRC when compared to the other sites within this assessment.	May/August 2019
4	Continued to state the need for a new recycling centre in HH at HGC partnership meetings for a location within the HGC Framework Plan. Also, in planning performance agreement discussions for Land East Hemel Hempstead (In SADC, Local plan references H1-H4).	Throughout 2024-2025
5	HCC met with DBC and SADC officers to present high level RC site search work.	22/07/2025
6	HCC shared site search work with DBC, SADC and HGC for comment.	23/07/2025
7	HCC is aware that DBC is considering the redevelopment of Cupid Green and sites around it to meet their waste depot requirements and that there is a potential opportunity for a co-located waste depot and recycling centre within this site. However, there is currently no certainty that this will be delivered.	September 2025
8	HCC submitted written representation to SADC and DBC examinations in public	October 2025

4 PLANNING POLICY CONTEXT

National Planning Policy Framework

45. The National Planning Policy Framework ('the Framework')¹¹ places sustainable development at the heart of national planning policy. It promotes the delivery of homes, commercial development, and supporting infrastructure in a way that

¹¹ Ministry of Housing, Communities & Local Government, National Planning Policy Framework, 2023.

balances economic, social, and environmental objectives.

46. Paragraph 8 of the Framework outlines three overarching goals of sustainable development:

- Economic: Supporting growth and innovation
- Social: Fostering strong, vibrant, and healthy communities
- Environmental: "...to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

47. The provision of a modern, larger recycling facility directly supports these objectives particularly the environmental goal by enabling increased material recovery, reducing reliance on landfill, and contributing to a circular economy.

48. In respect of cooperation, paragraph 27 of the Framework indicates that "once matters which require collaboration have been identified, strategic policy making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matter, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. Their plans should ensure that.

- a) a consistent approach is taken to planning the delivery of major infrastructure such as major transport services/projects, utilities, waste" ... "and other social infrastructure"

49. Confirming that it is reasonable to expect policy acknowledgment of the need in the plan and for that need to be addressed.

National Planning Policy for Waste (October 2014)¹²

50. This policy framework seeks to advance sustainable waste management across England. It encourages movement up the waste hierarchy, supports a diverse mix of facility types and scales, and emphasizes the importance of adequate waste disposal provision. A new recycling centre aligns with these aims by improving recycling rates and reducing residual waste.

Minerals and Waste Planning Policy – Hertfordshire Waste Development Framework¹³

51. The Adopted Hertfordshire Waste Development Framework sets out the strategic objectives and policies for minerals and waste management across the county.

¹² Department for Communities and Local Government, National Planning Policy for Waste, October 2014

¹³ Hertfordshire Waste Development Framework, Waste Core Strategy & Development Management Policies, Development Plan Document 2011-2026, Adopted November 2012.

Several policies are directly relevant to the development of a replacement recycling facility:

Policy	Title
Policy 2	Waste Prevention and Reduction
Policy 3	Energy & Heat Recovery
Policy 4	Landfill and Land Raise
Policy 5	Safeguarding of Sites
Policy 6	Green Belt
Policy 7	Criteria for Planning Applications Outside Identified Locations
Policy 8	Waste Parks / Combined Facilities
Policy 9	Sustainable Transport
Policy 10	Climate Change
Policy 11	General Criteria for Waste Planning Applications
Policy 12	Sustainable Design, Construction and Demolition
Policy 13	Road Transport and Traffic
Policy 14	Buffer Zones
Policy 15	Rights of Way
Policy 16	Soil, Air and Water Protection
Policy 17	Protection of Sites of International and National Importance
Policy 18	Protection of Regional and Local Designated Sites
Policy 19	Protection and Mitigation
Policy 20	Monitoring and Enforcement

52. These policies collectively support the development of well-designed, strategically located, and environmentally responsible waste infrastructure. A new HHRC would contribute meaningfully to these policy goals, particularly in the context of population growth and increased demand for sustainable waste services.

Assessment against Planning Policy context

53. The need for enhanced recycling infrastructure, including the relocation of the Hemel HHRC, is supported by existing adopted planning policies in both DBC and SADC.

54. Dacorum Core Strategy 2006–2031¹⁴

- **Paragraph 18.35** acknowledges that waste recycling and management facilities are appropriate within General Employment Areas and explicitly supports the potential relocation of the existing HHRC and Waste Disposal Centre in East Hemel Hempstead to better serve the area's needs.
- **Paragraph 11.14** outlines the vision of the Maylands Masterplan, which promotes the concept of 'Greening Maylands' through improved green spaces, sustainable development, and green business practices. It proposes the creation of a Green Energy Centre linked to district heating opportunities

¹⁴ Core Strategy 2006-2031, Dacorum Borough Council, Adopted 25 September 2013, Dacorum's Local Planning Framework

in Maylands Business Park and highlights potential synergies with in-vessel composting facilities and a relocated HHRC, reinforcing the area's role in advancing environmental infrastructure.

55. St Albans District Local Plan Review 1994¹⁵

- **Policy Intention 29: Re-use and Recycling of Waste**

The Council supports initiatives that promote the re-use and recycling of waste, including the use of biodegradable materials, reflecting a longstanding commitment to sustainable waste management practices.

5 ALIGNMENT WITH EMERGING LOCAL PLANS

56. Both the emerging Regulation 19 Local Plans of DBC and SADC acknowledge the strategic requirement for a new HHRC to support the planned growth within the Hemel Hempstead catchment area. This infrastructure is considered essential to meet the needs of expanding communities and to ensure sustainable development.

57. Dacorum Borough Council – Emerging Local Plan to 2041 (Pre-Submission Version, November 2024)

Strategic Policy HGC2 – Hemel Garden Communities Place Principles

Pillar 2: Integrated Neighbourhoods

- (f) Delivery of key projects, including Household Waste Recycling and Local Authority Depot facilities, to serve both new and existing communities.

58. St Albans City and District Council – Draft Local Plan 2041 (Regulation 19 Publication, September 2024)

Policy LG3 – Hemel Garden Communities Growth Areas Place Principles

Pillar 2: Integrated Neighbourhoods

- (g) Delivery of key projects, including a Household Waste Recycling Centre and Local Authority Depot facilities, to meet the needs of new and existing communities.

¹⁵ City and District of St Albans District Local Plan Review 1994 (Adopted 30 November 1994), Saved and Deleted Policies version (July 2020)

Climate Change Commitments

59. Both councils recognise the climate emergency. DBC declared a climate and ecological emergency in 2019¹⁶ and made this a corporate priority. SADC published their Sustainability and Climate Crisis Strategy (2020-2023)¹⁷.
- *SADC Strategic Policy SP2 – Responding to the Climate Emergency*¹⁸
60. Recognises the urgent need to address climate change through robust mitigation and adaptation strategies.
- *DBC Strategic Policy CC1 – Climate Change Mitigation and Adaptation*¹⁹
61. Requires all development to actively contribute to climate change mitigation and adaptation, with a focus on reducing carbon dioxide emissions.
62. The RC would play a role in advancing sustainability by actively recycling waste rather than generated on-site. This not only reduces landfill dependency but also aligns with broader climate change commitments by lowering carbon emissions and promoting circular resource use. Through its integrated waste management strategy, the RC demonstrates environmental responsibility and contributes meaningfully to national and international climate goals.

6 PRINCIPLE OF DEVELOPMENT

63. The Government's Resources and Waste Strategy 2018 (RWS)²⁰ supports the waste hierarchy and promotes the use of RCs to achieve this. The RC service plays an important role in moving waste up the waste hierarchy and is in line with the Waste Hierarchy that priorities Reuse over Recycling and Recovery.
64. The Hertfordshire RC network has evolved over time with facilities traditionally developed to serve sizable settlements and the location and size of each centre principally determined by the availability of suitable land.
65. To enable the RC network to actively support the RWS and implement the waste hierarchy, larger centres capable of segregating further waste streams and able to accommodate better reuse facilities will be required.
66. HGC Framework Plan documents have been published as evidence for both the SADC and DBC Local Plan examinations. As part of this, both Districts have published the HGC Framework Plan Evidence Base Report²¹ which sets out

¹⁶ <https://www.dacorum.gov.uk/home/environment-street-care/climate-change/tackling-climate-change>

¹⁷ <https://www.stalbans.gov.uk/sustainability-and-climate-crisis-strategy>

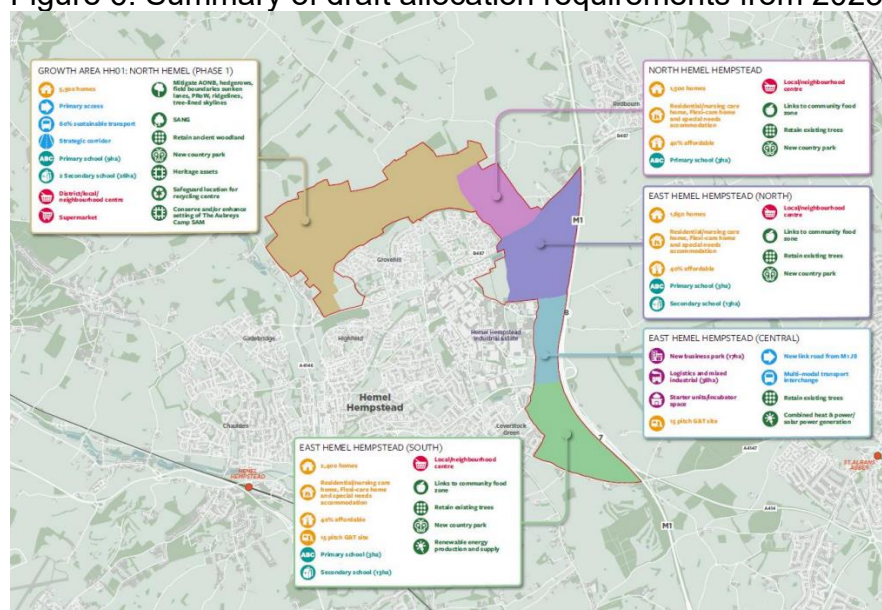
¹⁸ St Albans City and District Council, Draft Local Plan 2041, Regulation 19 Publication, September 2024

¹⁹ Dacorum Local Plan to 2041, Pre-Submission Version, November 2024

²⁰ HM Government, Our waste, our resources: A strategy for England

²¹ Framework Plan, Evidence Base Report, September 2024, Hemel Garden Communities

Figure 6 that summarises the wider policy requirements:



(Source: HGC Framework Plan Evidence Base Report (September 2024))

67. As indicated in the above diagram (Paragraph 4.13, page 25) in the HGC Framework Plan Evidence Base Report (September 2024), Growth area HH01: North Hemel (Phase 1) has a requirement for “Safeguarded location for recycling centre”.
68. St Albans and Dacorum District Council Local Plans also published the HGC Framework Plan Evidence Base Report Appendices (September 2024) which refer to:
- Para 3.27 “The draft Dacorum Local Plan (2020) included a requirement under allocation HH01 to safeguard land for a waste recycling centre. A site of 1ha is needed.”
 - Table 1: HH01 Policy requirement: DBC 2020 Regulation 18 requires “Safeguarded land for a council depot and household waste recycling centre”. However, DBC 2023 Regulation 18 does not require a new RC.
69. This evidence refers to the need for safeguarded land for a council depot and household waste recycling centre, however, the emerging Local Plan policies do not allocate or safeguard land for this use. A site search has been undertaken to identify a site allocation.
70. This recent site search study for a replacement recycling centre in the Hemel Hempstead area has undertaken a comprehensive assessment of potential locations, with a clear policy preference for brownfield land over greenfield alternatives. The study also prioritises sites that are capable of being delivered within the early in the plan period, in alignment with sustainable development objectives and land-use planning principles.

Table 3: Consolidated short list of potentially suitable sites:

Ref	Address	Timescales	Site type
RC20	Cupid Green Depot, Redbourn Road, Hemel Hempstead, HP27BA	Uncertain, no published DBC position	Brownfield
RC140 and RC027	East Hemel Hempstead (Central), HP2 7LF	Within the SADC plan period	Part built
RC138	North Hemel Hempstead, AL3 7AU	Within the SADC plan period.	Greenfield
RC141 (RC017 is part of this site)	East Hemel Hempstead (South), HP2 4PA	Within the SADC plan period	Greenfield
RC112	North Hemel Hempstead Growth Area.	2032/33.	Greenfield

Perceptions of Waste Facilities

71. Waste management sites are often perceived as undesirable neighbours, which can present challenges in site location. To help address these concerns, Appendix 2: Providing Service for Residents – Recycling Centres of the Local Authority Collected Waste Spatial Strategy²² was prepared. This document highlights the essential role recycling centres play in serving local communities and provides illustrative examples of how such infrastructure can be thoughtfully and successfully integrated into the surrounding environment.

Location in the Green Belt

72. The emerging Local Plans for both SADC and DBC propose the release of Green Belt land to accommodate substantial residential development. These allocations include:

- HM01 (DBC): Approximately 5,000 new homes
- H1, H2, H4 (SADC): Approximately 5,500 new homes

73. The scale of growth identified in both Local Plans triggers the requirement for enhanced waste infrastructure, positioning the HHRC as essential supporting infrastructure for the Hemel Hempstead catchment area.

²² Providing Services for Residents: Recycling Centres, December 2020, Hertfordshire County Council

74. The potential re-designation of Green Belt and greenfield sites presents a strategic opportunity to relocate recycling centres to more accessible and operationally effective locations. Should the release of Green Belt land be justified for housing, it follows that associated infrastructure such as the HHRC should also be considered appropriate for development within these areas.

75. A precedent exists within Hertfordshire, where the Ware Recycling Centre was successfully and sensitively integrated into a Green Belt location. This example demonstrates that, with careful planning and design, such facilities can be delivered in a manner that respects and complements the surrounding environment.

7 CONCLUSION

76. This report demonstrates a clear and compelling need for a new Hemel Hempstead Recycling Centre (HHRC), underpinned by significant growth within the Hemel Hempstead catchment. The proposal represents a strategic and forward-looking response to rising demand and is fully aligned with both adopted and emerging Local Plans.

77. The principle of development is supported by national and local planning policy, including the National Planning Policy Framework ('the Framework'), which provides justification for the release of land from the Green Belt under exceptional circumstances. As critical supporting infrastructure, the HHRC is essential to meeting the evolving needs of the community and enabling sustainable development.

78. The HHRC will act as a "good neighbour" by integrating sensitively into its surroundings, minimising environmental and amenity impacts, and fostering positive relationships with nearby communities. Its design and operation will reflect best practice in site management, accessibility, and landscape integration.

79. Importantly, the HHRC will contribute directly to addressing the climate emergency by promoting high levels of recycling, reducing waste to landfill, and supporting circular economy principles. Through its role in sustainable resource management, the HHRC will help reduce carbon emissions and support local and national climate change commitments.

80. A high-level, broad and flexible approach to site selection has been maintained, ensuring that all locations meeting the technical and operational requirements are considered. This allowed for the identification of the most suitable and sustainable site, while remaining compliant with planning policy and delivering long-term benefits to the region.

81. To ensure coordinated infrastructure delivery and support the area's growth strategy, it is vital that a site for the HHRC is formally designated within the DBC or the SADC Local Plans. Consequently, not only is the need for the facility evidenced in this report, the ask for it is not unduly onerous. Positive policy acknowledgment of the land use need and certainty provided by a policy allocation reference would be consistent with policy guidance and advice.

8 REFERENCES

1	Dacorum Local Plan to 2041, Pre-Submission version, November 2024
2	St Albans City & District Council Draft Local Plan 2041, Regulation 19 Publication, September 2024
3	Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex, Updated April 2022
4	Hemel Hempstead HWRC Site Search, May 2016, Lambert Smith Hampton
5	Land Search Schedule – Developable land (approx. 1 hectare) for a Household Waste Recycling Centre, near Hemel Hempstead, May 2019, Carter Jonas
6	Hemel Hempstead HWRC - Review of sites identified by Carter Jonas identified by Carter Jonas Availability Schedule for 1ha of land August 2019
7	Hertfordshire Infrastructure & Funding Prospectus, 2018-2031, Aecom.
8	Appendix 2: Providing Service for Residents; Recycling Centres in the Local Authority Collected Waste Spatial Strategy Recycling Centre Annex, Updated April 2022, sets out examples of where recycling centres have been successfully designed and integrated into the local setting.
9	Service Provision and Place-Making Guide (Adopted February 2024)
10	St Albans Stage 2 Green Belt Review, Final Report June 21023, Arup
11	Ministry of Housing, Communities & Local Government, National Planning Policy Framework, December 2024.
12	Department for Communities and Local Government, National Planning Policy for Waste, October 2014
13	Hertfordshire Waste Development Framework, Waste Core Strategy & Development Management Policies, Development Plan Document 2011-2026, Adopted November 2012.
14	Core Strategy 2006-2031, Dacorum Borough Council, Adopted 25 September 2013, Dacorum's Local Planning Framework
15	City and District of St Albans District Local Plan Review 1994 (Adopted 30 November 1994), Saved and Deleted Policies version (July 2020)
16	https://www.dacorum.gov.uk/home/environment-street-care/climate-change/tackling-climate-change
17	https://www.stalbans.gov.uk/sustainability-and-climate-crisis-strategy
18	St Albans City and District Council, Draft Local Plan 2041, Regulation 19 Publication, September 2024
19	Dacorum Local Plan to 2041, Pre-Submission Version, November 2024
20	HM Government, Our waste, our resources: A strategy for England
21	Framework Plan, Evidence Base Report, September 2024, Hemel Garden Communities
22	Appendix 2: Providing Service for Residents – Recycling Centres of the Local Authority Collected Waste Spatial Strategy

9 APPENDICES

Appendix 1	New HHRC site search spreadsheet, July 2025
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