



**REPRESENTOR ID: 837689**

**EXAMINATION OF THE ST ALBANS DISTRICT LOCAL PLAN**

**STATEMENT OF HERTFORDSHIRE COUNTY COUNCIL (HCC)  
GROWTH & INFRASTRUCTURE UNIT**

**ON BEHALF OF HCC (excluding HCC Property)**

**IN RELATION TO MATTER 6: THE BROAD LOCATIONS FOR DEVELOPMENT  
(POLICY S6), GENERAL MATTERS (POLICY S6) AND STRATEGIC  
INFRASTRUCTURE (POLICIES L17 AND L18)**

**DECEMBER 2019**

## 1.0 Summary

- 1.1 This statement is in response to the questions that have been raised by the Inspectors under Matter 6: The Broad Locations for Development (Policy S6) and Strategic Infrastructure (Policies L17 and L18) that are contained within Examination Document: *ED26-Stage 1 Matters, Issues and Questions*.
- 1.2 HCC has only sought to address the specific questions that are of relevance to the topic areas covered in the county council's representations to the Regulation 19 Publication Draft St Albans Local Plan (submitted to the district council on 17 October 2018).
- 1.3 This statement follows the format of the questions that are listed under Matter 6 in Examination Document ED26.

## 2.0 Questions

Q9. Have the infrastructure requirements of the broad locations and other strategic infrastructure been adequately identified and costed in an up to date IDP? Including the requirements for:

a) road improvements;

b) public transport systems and sustainable transport networks;

- 2.1 As per HCC's response to Matter 2, the IDP cannot identify what or when transport infrastructure is required, nor can HCC be confident it would enable the delivery of the infrastructure that is mentioned/included within the proposed IDP. It is not clear if costings have taken place.
- 2.2 A main concern is the understanding of when infrastructure will be required for the delivery of the broad locations, although there is an indication in the published housing trajectory, Policies S6 i) to xi) do not explicitly say when any of these broad locations are expected to come forward. Timeframes for delivery have not been set out and doing so would not be possible due to the current level of technical work available. Furthermore, the format of the proposed IDP is not considered suitable by HCC as a template.

f) schools and early years' provision;

- 2.3 Policies S6 i) and iii) to xi) includes provision for schools and early years provision that are supported in principle by the county council. Costs were included within the county council's representation to the Publication Draft St Albans Local Plan, although HCC acknowledges that these are likely to change in the future.

Q10. Are any infrastructure requirements missing?

- 2.4 HCC considers that a 1ha Household Waste Recycling Centre (HWRC) should be allocated within the East Hemel Hempstead (Central) Broad Location, as stated in the county council's soundness objection to this Policy S6 ii) in October 2018.
- 2.5 HWRC provision within Hemel Hempstead is in the form of a constrained site within the Maylands industrial area at Eastman Way, which has little prospect for expansion. The facility is also too small to adequately deal with the high level of demand placed on it and the size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Investigations to expand this centre identified that neighbouring land is contaminated and therefore it is not financially viable to expand this centre.
- 2.6 HCC therefore considers that a replacement facility to meet the needs of an enlarged Hemel Hempstead and surrounding areas is needed. This deficiency has also been communicated to Dacorum Borough Council (DBC) in the form a separate representation to DBC's Issues and Options Local Plan consultation in December 2017, as most of Hemel Hempstead falls within the administrative area of Dacorum Borough.
- 2.7 Since the submission of HCC's soundness objection to Policy S6 ii), the county council updated the Local Authority Waste Spatial Strategy HWRC Annex in April 2019. This update slightly amends the areas of search for new HWRCs that are needed in the county. There are now three areas of search and the east Hemel Hempstead area now falls within Area of Search 3.<sup>1</sup> The service property priority indicator table for the HWRC network<sup>2</sup> within appendix 1 of the updated annex, still continues to highlight the major deficiencies to this facility that are outlined in paragraph 2.5.
- 2.8 The updated HWRC annex was endorsed by Members at the county council's Community Safety and Waste Management Panel on 17 May 2019 and at Cabinet on 10 June 2019. HCC Officers were asked by Members at Cabinet to seek clarification and a Statement of Common Ground (SoCG) between HCC, SADC and DBC with regard to the provision of a suitable site for a new HWRC within the new development at East Hemel Hempstead.
- 2.9 A SoCG, which outlines HCC's reasoning for allocating a new 1ha HWRC within the East Hemel Hempstead (Central) Broad Location has been drafted by HCC and circulated for comment and agreement to DBC and SADC. This is attached to Appendix 1.

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<sup>1</sup> Plan 7, Areas of Search for HWRC Provision, Hertfordshire County Council Collected Waste Spatial Strategy, HWRC Annex, updated April 2019. <https://www.hertfordshire.gov.uk/media-library/documents/waste/spatial-strategy/hwrc-annex-to-the-lacw-spatial-strategy-2017.pdf>

<sup>2</sup> Appendix 1, Household Waste Recycling Centre Network, service property indicator table, Hertfordshire County Council Collected Waste Spatial Strategy, HWRC Annex, updated April 2019. <https://www.hertfordshire.gov.uk/media-library/documents/waste/spatial-strategy/hwrc-annex-to-the-lacw-spatial-strategy-2017.pdf>

- 2.10 Work to review the adjacent Dacorum Local Plan has been progressing. However, the borough council has yet to finalise its final site allocations for their pre-submission draft local plan, which is not expected to be published for consultation until the spring/summer 2020.<sup>3</sup> It is therefore unclear at the present time whether any potential site allocations within Hemel Hempstead will be suitable for a new HWRC.
- 2.11 Whilst most of the existing Maylands and Buncefield industrial areas on the eastern side of Hemel Hempstead are designated as an Employment Land Areas of Search (ELAS) within the county council's Waste Site Allocations DPD (adopted in July 2014)<sup>4</sup>, suitable plots of land within these ELAS will need to become vacant for a new HWRC to be considered. It is also likely that ground contamination issues may exist from previous uses within these ELAS, particularly within the Buncefield industrial area. This may considerably increase the cost of developing a new HWRC within this area.
- 2.12 In the light of the above, HCC (in conjunction with Carter Jonas) undertook a site search for a replacement HWRC for Hemel Hempstead earlier this year, which looked at possible sites within Hemel Hempstead, along with sites in the western part of St Albans City & District. This took into account the Publication Draft St Albans Local Plan and sites that may be deliverable in the short to medium term.
- 2.13 HCC's assessment of this site search is that a 1ha site within the proposed Hemel Hempstead (Central) Broad Location, still remains the most viable option for a new HWRC. This is on the basis of the site being promoted by SADC for employment generating uses, along with its proposed removal from the Green Belt. There are also unlikely to be any underlying ground contamination issues that will need remediating, due to its current agricultural land use.
- 2.14 In the light of the above, HCC continues to seek a new 1ha HWRC within the East Hemel Hempstead (Central) Broad Location in the form of a modification to criterion 5 in Policy S6 ii), as outlined in HCC's soundness objection.
- 2.15 The Local Plan Policies Map should also be amended to include a 1ha HWRC allocation within the East Hemel Hempstead (Central) Broad Location that reflects the policy wording under criterion 5.

<sup>3</sup> Chart A: Programme of Development Plan Document production, Dacorum Borough Council Local Development Scheme, 2018-2021 (June 2019). <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-development-scheme-2018-2021-june-2019.pdf?sfvrsn=4>

<sup>4</sup> Inset Map 003, Hertfordshire County Council Waste Site Allocations Development Plan Document, 2011-2026 (July 2014). <https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/planning-in-hertfordshire/waste-local-plan/the-waste-site-allocations-document-compressed.pdf>

## **Appendix 1**

### **DRAFT STATEMENT OF COMMON GROUND**

#### **Between**

**Hertfordshire County Council, Dacorum Borough Council and St Albans City & District Council in relation to a**

**New Household Waste Recycling Centre (HWRC) at the East Hemel Hempstead (Central) Broad Location**

**June 2019**

#### **1.0 Scope of this Statement**

- 1.1 This Statement of Common Ground (SoCG) has been prepared in relation to an identified need for a new Household Waste Recycling Centre (HWRC) at the East Hemel Hempstead (Central) Broad Location, as stated in representations made by HCC to St Albans City & District Council's (SADC's) Proposed Submission Local Plan in October 2018.
- 1.2 In addition to this, HCC has also stipulated in this representation that the existing HWRC at Eastman Way in Hemel Hempstead lacks the capacity for expansion and therefore a replacement facility to meet the needs of an enlarged Hemel Hempstead and surrounding areas is needed. This was previously stated in a separate representation to Dacorum Borough Council's (DBC's) Issues and Options Local Plan consultation in December 2017, as Hemel Hempstead falls within the administrative area of Dacorum Borough.
- 1.3 This statement sets out the matters agreed between the parties, as well as those which are not agreed.

#### **2.0 Detailed Statement**

- 2.1 The National Planning Policy for Waste (NPPW) adopted in October 2014, regards employment land as a compatible land use for waste management facilities (which includes HWRCs) and priority should be given to employment land when allocating sites for such facilities.<sup>5</sup> The proposed 55ha of new employment land at East Hemel Hempstead (Central); specifically the 38ha of new logistics and mixed industrial within the employment area, is regarded as suitable and capable of being masterplanned to include a modern HWRC.
- 2.2 Paragraph 20 of the National Planning Policy Framework (February 2019) also stipulates that strategic policies contained in Local Plans should make sufficient

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<sup>5</sup> Paragraph 4, National Planning Policy for Waste, October 2014.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

provision for infrastructure, which includes the allocation of waste management facilities.

- 2.3 The allocation within SADC's Proposed Submission Local Plan of 55ha of new employment land at the East Hemel Hempstead (Central) Broad Location presents an opportunity to locate a 1ha modern HWRC Super Site<sup>6</sup> within it, due to its location within an Area of Search for a new HWRC that covers the east of Hemel Hempstead.<sup>7</sup> The county council considers that a new HWRC is required within this location to serve the wider waste management needs of the proposed housing developments to the East of Hemel Hempstead and the wider Hemel Garden Community that is currently being planned for. These areas of growth fall into the catchment area of the existing HWRC at Eastman Way and a replacement for this facility is required as identified in the Local Authority Collected Waste Spatial Strategy HWRC Annex (endorsed in June 2019).
- 2.4 The Growth & Infrastructure Unit's representation to SADC's Publication Draft Local Plan in October 2018, stated the need to identify 1ha of land for a new HWRC within the East Hemel Hempstead (Central) Broad Location, which was in the form of an objection to the applicable policy (Policy S6 ii: East Hemel Hempstead (Central) Broad Location) in the Local Plan.
- 2.5 HCC notes with some concern that the March 2019 consultation into the Environmental Impact Assessment (EIA) Scoping Opinion on land at East Hemel Hempstead (SADC ref: 5/2019/0537 and DBC ref: 4/00207/19/SCO) did not mention the need to include provision for a new 1ha HWRC within the 55ha of new employment land at East Hemel Hempstead (Central). This omission was mentioned in HCC's response to the EIA Scoping Opinion that was sent to both SADC and DBC.
- 2.6 The existing Hemel Hempstead HWRC in Eastman Way could be re-provided in the form of an expanded facility within the East Hemel Hempstead (Central) Broad Location. This HWRC is currently considered deficient in a number of areas, as the county council's Local Authority Collected Waste Spatial Strategy HWRC Annex (endorsed in June 2019) identifies the site as being too small to adequately deal with the high level of demand placed on it and it is also not possible to satisfactorily expand or reconfigure this centre.<sup>8</sup>

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<sup>6</sup> The definition of the Ware HWRC Super Site is outlined on p.27 of the HCC Local Authority Collected Waste Recycling Centre Annex, Update April 2019.  
<https://democracy.hertfordshire.gov.uk/documents/s8599/06%20Item%205%20HWRC%20Annex%20to%20the%20LACW%20Spatial%20Strategy.pdf>

<sup>7</sup> Plan 7: Areas of Search for HWRC Provision, HCC Local Authority Collected Waste Recycling Centre Annex, April 2019.  
<https://democracy.hertfordshire.gov.uk/documents/s8599/06%20Item%205%20HWRC%20Annex%20to%20the%20LACW%20Spatial%20Strategy.pdf>

<sup>8</sup> Page 33, HCC Local Authority Collected Waste Recycling Centre Annex, April 2019.  
<https://democracy.hertfordshire.gov.uk/documents/s8599/06%20Item%205%20HWRC%20Annex%20to%20the%20LACW%20Spatial%20Strategy.pdf>

- 2.7 It is possible to develop a modern HWRC that is sympathetic to the landscape in which it sits. Across the country there are examples of HWRCs provided in enclosed buildings and the feasibility of providing a HWRC within an enclosed space will be considered as part of the business planning process.
- 2.8 Concern has been expressed that the re-provided Hemel Hempstead HWRC could lead to the de-commissioning of the existing St Albans HWRC at Ronsons Way. Such concerns are a potential barrier to the allocation of a new facility to serve Hemel Hempstead. While the Local Authority Collected Waste Spatial Strategy and the accompanying HWRC annex indicates that the St Albans HWRC at Ronsons Way is unsuitable, the annex states that all existing centres will continue to operate and only once new and planned/proposed centres are developed will configuration of the HWRC network be considered.<sup>9</sup>

### **3.0 Changes to the Proposed Submission St Albans Local Plan**

- 3.1 Policy S6 (ii) in SADC's Proposed Submission Local Plan covers the East Hemel Hempstead (Central) Broad Location. As stated in paragraph 2.4, the Growth & Infrastructure Unit in its representation to this plan objected to the current wording within this policy and suggested modifications to it, in order to incorporate a new HWRC within this location in the form of the following amendment:

*"5. A significant new logistics and mixed industrial area on the northern approximately 38 Hectares of the site, including the provision of a new 1 Hectare Household Waste Recycling Centre"*

### **4.0 Matters Agreed between the parties**

- 4.1 HCC and DBC agree that the wording of Policy S6 (ii) in the Proposed Submission Local Plan should be amended in order to anticipate and acknowledge the potential need to deliver a HWRC within this area and to meet the needs of the existing and new communities.
- 4.2 Failure to provide an opportunity to meet the needs of the proposed housing developments within the wider Hemel Garden Community runs the risk that delivery of new HWRC capacity would be less certain in the medium and long-term.

### **5.0 Matters not agreed**

- 5.1 SADC do not agree that the East Hemel Hempstead (Central) Broad Location is an appropriate area for a HWRC.

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<sup>9</sup> Pages 31 and 32, HCC Local Authority Collected Waste Recycling Centre Annex, April 2019.  
<https://democracy.hertfordshire.gov.uk/documents/s8599/06%20Item%205%20HWRC%20Annex%20to%20the%20LACW%20Spatial%20Strategy.pdf>