

REP169 00997/1



**Chief Executive and Director of
Environment: John Wood**

Elstree Way Corridor
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My ref : SLUPMW/EWCAAP
Your ref :

Date : 26 March 2014

Dear Sir/Madam,

Response to the Submission Elstree Way Corridor Area Action Plan, February 2014

I am writing in response to the above submission draft of the Area Action Plan, insofar as it raises issues in connection with waste planning matters.

The Waste Planning Authority (WPA) is pleased to see that waste and recycling matters have been considered in paragraph 6.40, especially the need to consider purpose built waste and recycling bin storage facilities early on in the design process rather than an add-on at a later stage. As the borough council's adopted Core Strategy considers matters concerning waste generation in section 5, which is in accordance with the EU Waste Framework Directive, the WPA considers it to be unnecessary for the AAP to elaborate further on waste recycling matters. However, to ensure continuity with the Core Strategy, paragraph 6.40 could be expanded further to include a statement that refers to the borough council's approach to waste generation. This could state:

"Paragraphs 5.50 to 5.53 of the adopted Hertsmere Core Strategy, outline the borough council's strategy towards waste generation, which should be taken into consideration at the planning application stage for developments submitted within the Area Action Plan (AAP) boundary. Policies CP1 and CS16 of the borough council's Core Strategy should also be considered, as these require developers to make provision for waste minimisation and recycling during the construction phase and subsequent occupation. The vision and strategic objectives outlined in the county council's adopted Waste Core Strategy and Development Management Policies document, along with its relevant policies for all types of development, should also be considered."

It should be noted that the AAP boundary in the submission document, adjoins and partially includes an employment land area of search (ELAS191 Elstree Way Employment Area) identified in the Waste Site Allocations Proposed Submission document, November 2012. This document was submitted for its examination in June 2013 and the hearing sessions took place in September and November 2013. The county council is currently awaiting the Inspector's final report. The boundary of ELAS191 was amended by way of a main modification (MM7) to exclude land that fell within the AAP boundary, as shown in the consultation draft published by the borough council in January 2013. The main modifications to the Waste Site Allocations document, including MM7, were discussed at the close of the hearing sessions in November 2013. However, the AAP boundary appears to have been subsequently amended in the submission draft, published in January 2014 and now includes part of ELAS191.

It is considered important therefore that as paragraph 4.32 in the adopted Hertsmere Core Strategy acknowledges that waste management facilities will be considered within the borough's employment areas, this is reflected in the AAP, along with the acknowledgement that the AAP adjoins and partially includes land designated as ELAS191. It is the county council's intention to write an ELAS Supplementary Planning Document, which will contain site specific key planning issues for each ELAS and will elaborate on the general ELAS waste brief contained in the Waste Site Allocations document.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Wells', with a stylized flourish at the end.

Martin Wells
Planning Officer – Minerals and Waste Policy