

Transition Town Letchworth's response to Consultation on the Hertfordshire Draft Waste Local Plan 2020

Expected Waste Volumes

Para 5.14 states that “over 3.5 million tonnes (t) of waste is projected to arise within Hertfordshire in 2019 and over 4.4 million tonnes is projected to arise within 2033” (a 25.7% increase). According to the ONS (2018 based population projections) Hertfordshire population would be 1,188,458 in 2019, rising to 1,221,551 in 2033 (a 2.7% increase). Nationally a 5.54% population increase is predicted between 2019 to 2033.¹ The national waste strategy includes a number of policies (summarised in paragraph 3.16 of the consultation strategy) to reduce and avoid waste arisings, so why is Hertfordshire County Council planning an increase in waste arisings that is dramatically greater than the expected population growth? TTL has concerns that the waste levels being planned for as arising within Hertfordshire are far too high, contrary to the UK's ‘direction of travel’.

TTL would like to see a county council Waste Local Plan which incorporates waste reduction plans along with plans for waste disposal of genuinely residual waste. To tackle waste in Hertfordshire requires both a strategy to reduce waste as well as a plan to dispose of waste. The WCA/WDA separation of responsibility between Waste Collection processes and Waste Disposal processes (including those passed off as “RI Status” Energy From Waste, *see below*) seems no longer fit for purpose. The Herts. Waste Partnership/WasteAware initiative shows a recognition across councils that joined up working is important for managing waste, we would encourage the County and District Councils to go further and consider bringing these services together, giving responsibility to the most appropriate authority.

Waste Traffic Management

Traffic is a significant issue to be taken onto account when planning waste sites. TTL would have liked this Local Plan to have included new facilities which would reduce visits to the larger waste disposal sites. For example,

- Improved bulky waste collection services. In North Herts residents are allowed up to 6 items, but are restricted as to what these items can be. These restrictions can lead to extra unnecessary runs to local recycling centres during home improvement work.
- Provision of community level composting facilities.
- Provision of more local collection points for smaller items like electrical goods / light bulbs, which contain valuable raw materials but people may just throw in the bin to avoid the necessity of a trip to a Recycling Centre.

Waste Consultation Areas

Para 9.7 identifies a 250m Waste Consultation Area around **strategic sites and HWRCs**. We would suggest that any new development which shares an access road with a waste facility feeder road should be subject to a Waste Consultation. **For example in** Letchworth, 128 new homes are proposed which will be just over 250m from the Waste Facility on Blackhorse Road. The only access road to these homes is Blackhorse Road and all the traffic will pass within a 250m radius of the Waste Facility, even though the housing is just outside this radius.

¹ ONS National population projections: 2018-based, [link](#): chapter 2, Figure 1, UK Population; from 66.8m in 2019 to 70.5m on 2033.

High Temperature Energy From Waste (EFW)

It is now widely recognised that EFW plants using any form of incineration are not delivering 100% renewable energy, in fact they often burn fossil oil & gas based products and are a significant source of carbon emissions. EFW plants require feedstocks; when recyclable materials are accepted into 'residual' waste streams without subsequent sorting and recyclable materials are not processed as such, EFW plants are being fed those recyclables, which is a scandalous waste of valuable materials. Nationally there is already oversupply of EFW sites in operation or in construction so we are asking that this local plan make clear that there will be no **incineration-based** EFW siting within Hertfordshire.

Anaerobic Digestion

TTL would like the plan to identify the potential for more Anaerobic Digestion facilities in Hertfordshire. Diverting waste currently processed in hot composters to Anaerobic Digestion would allow energy as well as compost to be generated from this raw material.

Site Lists

There are a number of facilities whose lease expires during the plan period which are not seen as viable sites going forward. It would be helpful if the plan could provide a year by year summary of waste capacity, both by site and overall.