

**Hertfordshire Minerals and Waste Development Framework**  
**Waste Site Allocations Issues and Preferred Options 2 – November 2009**

**Response by CPRE – The Hertfordshire Society**

**Section 5: Sites identified as Preferred Waste Areas**

**Land in the Green Belt**

Twelve of the 25 Preferred Waste Areas (48%) are located in the Metropolitan Green Belt. Of the 253 potential sites included in the March 2008 Waste Site Allocations Preferred Options consultation, 16 (only 6.3%) were in the Green Belt. One third of the Preferred Areas now proposed have no existing waste uses. Consequently, the chances of waste management development in the Green Belt have increased significantly over the course of a year. Rather than protect it, the site selection process adopted has put the Green Belt at higher risk.

PPS10 *Planning for Sustainable Waste Management* states (in paragraph 3) that all planning authorities should deliver planning strategies that:

*“protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission”.*

The emphasis is therefore on identifying and giving appropriate weight to the locational needs of every site-specific proposal, and then deciding whether those needs, together with other material factors, are sufficient to outweigh green belt policy considerations. We do not believe that this has been achieved in every case in this Site Allocations consultation document, as we demonstrate below.

This issue is covered in the Waste Core Strategy & Waste Development Policies consultation document on which we comment separately. Paragraph 3.28 of that document confirms that the siting of waste management facilities within the Green Belt requires very special justification, and explains that this could be met by locating the facilities as close as practicable to the source of the waste and the availability of sustainable transport links. Paragraph 3.29 goes on to say that, in order to protect Hertfordshire’s Green Belt land, non-green belt sites will be given priority, but the County Council recognises that some waste development may be appropriate in the Green Belt.

Policy 4 of the draft Core Strategy states that waste management facilities within the Green Belt will not be permitted unless there are very special circumstances which make a location in the Green Belt appropriate, and goes on to set out the criteria to be taken into account. It seems to us that these criteria have not been followed consistently in the site selection process, and that too much weight has been given to the sources of waste and too little weight to the availability of sustainable transport links in the case of some of the Preferred Areas. Furthermore, we consider that in some cases insufficient weight has been given to the extent to which the land in question meets the purposes and objectives of including land in the Green Belt, as set out in PPG2 *Green Belts*.

**Hertfordshire Minerals and Waste Development Framework**  
**Waste Site Allocations Issues and Preferred Options 2 – November 2009**

**Response by CPRE – The Hertfordshire Society**

Previously developed land

Throughout the consultation documents, land that has been used for mineral extraction, whether fully restored or not, is described as ‘previously developed’, and this has been taken into consideration as a factor in identifying sites for various kinds of waste management facilities. Whether by accident or design, the term ‘previously developed’ is omitted from the definitions in the Appendix D – Glossary. Annex B of PPS3 defines previously-developed land as that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. The definition specifically excludes “*land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures*”. The County Council have therefore misdirected themselves on this point. This alters the balance of factors taken into account in the selection process in the case of some of the proposed Preferred Areas.

**Comments on specific Preferred Waste Areas**

We have the following comments on specific Preferred Waste Areas located in the Green Belt:

Presdales Pit, Ware (East Herts District)

This former sand and gravel quarry has not been restored to previous levels, and should not be regarded as previously-developed land. It is stated that waste developments on this site are considered to meet Core Strategy objectives 1, 2 and 6 (which we assume refers to the seven objectives listed in paragraph 2.3 of the Core Strategy document). We regard this justification as being extremely tenuous.

The site is relatively open countryside adjacent to the A10. Its development for the suggested waste facilities would not safeguard the countryside from encroachment and would add to the sprawl of Ware towards the A10. The site is close to two schools and recreation areas, for which waste management facilities would not be good neighbours.

The site is also proposed as a Re-Restoration Site, and we think that this would be a much more appropriate use for it.

Westmill Quarry, Ware (East Herts District)

This area comprises an existing quarry and a landfill site, and both sites are subject to an agreed scheme of restoration once landfilling has been completed. The land is on the opposite side of the A10 from the built-up area of Ware, in what is effectively open countryside, and its development for some of the waste facilities suggested would conflict with the purposes and appropriate uses of land in the Green Belt. There are 370 households located within 250 metres of the site.

Biffa are reported to be about to submit a proposal for a waste incinerator on the site. This would not be an appropriate development, in our view, and the site should not be designated as a Preferred Area for waste management facilities.

**Hertfordshire Minerals and Waste Development Framework**  
**Waste Site Allocations Issues and Preferred Options 2 – November 2009**

**Response by CPRE – The Hertfordshire Society**

Tyttenhanger Quarry, south of Courser's Road (Hertsmere Borough)

This is an existing sand and gravel quarry whose restoration is not due to be completed until 2032. As such, it is not previously-developed land. As stated in the consultation document, the site is visually exposed, being relatively flat and overlooked from Shenley Ridge and from the M25 motorway. The site lies in the Watling Chase Community Forest area.

Tyttenhanger Quarry North (St Albans District)

There is an anomaly in the consultation document in that Tyttenhanger Quarry North is listed (correctly) under St Albans District in appendix E, but is discussed jointly with Tyttenhanger Quarry South under Hertsmere Borough in Section 5 (pages 29-30 of the document). The two sites are quite distinct from each other, different planning considerations apply to them, and they should be considered separately.

Tyttenhanger Quarry North is situated in the Upper Colne Valley and is therefore subject to Policy 143 in the St Albans District Local Plan. The quarry forms part of area UCV.10 which is intended to be restored to agriculture and recreation use. The site is also in the Watling Chase Community Forest area. None of these considerations appear to have been taken into account in assessing the site's suitability for waste management development.

Roehyde, Hatfield (St Albans/ Welwyn Hatfield Districts)

This site occupies a prime location at the junction of the A1(M) with the A414 North Orbital Road. The site is identified in the St Albans Emerging Core Strategy (July 2009) as a possible strategic employment site, comprising a high quality, well landscaped business park and possibly an hotel. The kind of waste management facilities being proposed for the site would not be compatible with this type of employment development.

North of Stevenage A1(M) Junction 8 (Stevenage Borough)

This greenfield site has no history of having been used for minerals or waste related activities. Although 'landlocked' by the A602, A1(M) and East Coast Mainline railway, it forms part of the Green Belt separating the built-up area of Stevenage from Little Wymondley. The southern part of the site forms part of the Margaret's Wood, Todd Green Wildlife Site, which is intended to be protected from adverse development within or adjacent to it, according to the Stevenage District Plan Second Review.

Great Westwood Quarry, south of M25 (Three Rivers District)

This Green Belt site is located in open countryside, adjacent to the M25. As a former quarry which is now being restored, it does not qualify as previously-developed land. The site is bounded by three designated Wildlife Sites. Although adjacent to the motorway, access to the primary road network is difficult.

There is no particular reason for, and considerable obstacles to, using this site for waste management development.