

Hertfordshire Minerals and Waste Development Framework
Waste Core Strategy & Waste Development Policies
Issues and Preferred Options 2 – November 2009

Response by CPRE – The Hertfordshire Society

CPRE support the Objectives for Waste Management outlined on page 4 of the document and welcome the Council's statement in its Vision for Waste Management that it will: "*lead the country in its adoption, promotion and implementation of the waste hierarchy*" and the emphasis in the vision on waste reduction, re-use and recycling to minimise waste disposal to landfill. Similarly we welcome the statement that waste management facilities: "*will be located sensibly so that they reduce the environmental and social impacts ... and seek enhancement of the locality.*"

However, we find it difficult to reconcile the latter statement with the fact that 48% of the sites identified in the Waste Sites Allocations document are located within the Metropolitan Green Belt.

Similarly, it is difficult to reconcile such extensive potential use of Green Belt sites with the proposal in the Issues and Options table on page 5 that in order to reduce impact on the Green Belt the Council will "*encourage the use of brownfield land.*" It is clear that the Council, in its approach to the Green Belt, has adopted Option 2 in table A2 of the Sustainability Appraisal Report, namely: "*if a site is within the Green Belt, it will be permitted if its location is close to the source of the waste needing to be managed.*" In paragraph 42 of that report the Council justifies this by saying that this option "*reduces development pressure on sites outside the Green Belt*". These two positions contradict each other.

Policy 2: Strategy for Overall Provision of Waste Management Capacity (page 14)

We fully appreciate the implications of the pressure for growth arising from the East of England RSS and the potential impact of the resulting infrastructure deficit on the Waste Strategy. Inevitably the resulting increase in household and commercial waste arisings will reduce the pace at which the targets for reduction, re-use and recycling within the County can be met. It therefore surprises us that the Waste Core Strategy does not go into any detail on the siting of further MRFs or proposals to develop small local facilities for mechanical biological treatment and anaerobic digestion. Such facilities reinforce the principles of the Hertfordshire Waste Hierarchy, improve sustainability and reduce the requirement for major facilities across the County. Whilst this is implied in strategic objective 2, and the vision in paragraph 3.28, we are concerned that there is no reference in Policy 2 (Strategy for Overall Provision of Waste Management Capacity) of the development of initiatives and facilities at a local level, or that this aspect is not fully covered in Policies 5 (Land outside the Identified Areas) or 6 (Waste Parks / Combined Facilities).

We support the proposal in Policy 2 that "*the treatment of waste arising outside of Hertfordshire will only be considered where it can be demonstrated that compensatory provision of landfill capacity for residual waste is available*", particularly as considerably more waste appears to be coming into the county than is exported by it. In fact, we would like to see that paragraph amplified to include all alternative waste disposal options. The fact that there is no clear "cross-boundary" policies on all waste reduction and disposal technologies is an omission from the Core Strategy.

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Monitoring Indicators and Targets:

Policies 1 & 2 (page 19), Policy 5 (page 33) and Policy 12 (page 52)

All these references state: “*Number of planning permissions resulting in: b) enhancement of biodiversity; c) enhancement of the historic environment*”. We do not understand how waste management facilities can be said to “enhance” biodiversity and the historic environment, nor is this explained in paragraphs 4.98 – 4.105. We would urge the Council to clarify what they mean by these indicators and the justification of the targets proposed.

Policy 4 :Green Belt

We welcome this specific policy which states a presumption against development in the Green Belt and note the criteria used to define “very special circumstances” which might override that presumption. Given the intent of this policy to protect the Green Belt, it is again difficult to see how almost half of the identified sites in the Waste Sites Allocations document are then located in the Green Belt. We comment on the specific sites more fully in our response to the Waste Sites Allocations document.

In the section on Policies 1 & 2 Monitoring Indicators and Targets: Implementation (pages 18/19) and again on page 29 on Green Belt policy, CPRE is described as a “partner” in the identification of suitable sites for future waste uses and for development control determination of applications. The inference may be that CPRE therefore approve of the Green Belt sites included as ‘preferred options’. We do not. There has been no consultation with us about this, and it is not clear how we could actually operate as a ‘partner’ in the identification and determination processes. We expect to continue commenting on proposed site allocations and submitted applications as part of the normal consultation process, but that is not the same as being recognised as a ‘partner’.

(Incidentally: we are the **Campaign to Protect Rural England**, not “*for the Protection of Rural England*”)

Appendix A: Strategic Areas of Search and Constraints and Waste Core Strategy Key Diagram

We assume that both these diagrams are intended supplement the text in Chapter 3 Spatial Strategy (specifically paragraphs 3.15 – 3.17 and 3.29 – 3.39) Unfortunately, while the Site Allocations Development Plan Document may well “*make an informed decision in order to deliver a sustainable distribution of waste management facilities*”, it is not clear from this Core Strategy document why particular decisions have been made, and hence why the specific areas of search are where they are. While the justifications may have been clear to the authors of the document, they have not been clearly communicated to the ‘uninformed’ reader.