

Hertfordshire County Council
Waste Development Framework
Consultation on Waste Development Plan Documents
Response by CPRE – The Hertfordshire Society

CPRE – The Hertfordshire Society welcomes the development of a Hertfordshire Waste Disposal Development Framework and supports the overarching vision, objectives and strategic policies within the Waste Core Strategy, which we believe meet the tests of soundness outlined in the consultation documents.

Similarly we support the broad policy options set out in the Waste Development Policies Preferred Options, while recognizing that these policies are not yet finalised.

CPRE believes that waste policy should be governed by a waste hierarchy (as outlined in Annex C of PPS10 – Planning for sustainable waste management) and expect HCC to fully exploit waste minimization, re-use and recycling of waste, and composting before going on to consider disposal by incineration and landfill. We welcome the fact that the Waste Core Strategy is based on that principle.

In addressing the issue of Waste Site Allocations, we are mindful of paragraph 18 of PPS10 which requires the Waste Authority to "identify the type or types of waste management facility that would be appropriately located on the allocated site". Despite the detailed analyses of the 253 potential sites listed, there is no indication of the nature of the facilities which could be located at those sites. This makes it very difficult to assess and comment on the appropriateness of each site and whether or not it meets the requirements of PPS10.

This is particularly relevant in the case of the 16 sites which are located in the Green Belt.

Paragraph 3.20 of the Waste Site Allocations Preferred Options paper states that "When considering proposals for waste management in the Green Belt more weight should be given to the need for the facility and the proximity than to Green Belt policy *provided there is a clearly identified need that cannot be met elsewhere*" (our emphasis). That point cannot be addressed without knowing the use to which the site is to be put. Paragraph 3 of PPS10 makes it clear that the particular locational needs of some types of waste management facilities are material considerations in determining precedence over Green Belt policies, but those types of facilities need to be specified and Waste Core Strategy Preferred Option 5 should be amended to clarify this.

It should also reflect the point made in paragraph 27 of PPS10 that the planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land. In that context a balance needs to be struck between the requirements of PPS2 and PPS10. As currently drafted, Preferred Option 5 does not reflect that balance.

Of the 16 sites within the Green Belt, eleven have previously been used, mainly for landfill. Of the five new sites, we would vigorously oppose proposals for the following as inappropriate development:

- Presdales Pit (East Herts)
- Smug Oak Lane (St. Albans)
- A1(M) Junction 8 (Stevenage)
- Travellers Lane (Welwyn Hatfield)

We accept, however, that there may be a case for Roehyde (St Albans/Welwyn Hatfield) because of exceptional location aspects and previous uses on the site.

Paragraph 21(ii) of PPS10 places a responsibility on the Waste Authority to give priority to the re-use of previously developed land. Consequently, we expect HCC to give precedence to the use of existing employment land and expansion of existing waste management sites before the location of waste management facilities within the Green Belt is even considered.