

Little Berkhamsted Parish Council

www.littleberkhamsted.org.uk

Chairman:
Christopher Nunn
Trewinnard House
Little Berkhamsted
Hertford
SG13 8LS
Tel: 01707 874299
Email: cnunn@btopenworld.com

Clerk:
Graham Irwin
26 Fanshaws Lane
Brickendon
Hertford
SG13 8PF
Tel: 01992 511697 Fax: 0870 116 3398
Email: graham@compassion-in-business.co.uk

20 September 2007

Mr Iain Leech
County Development Unit
Hertfordshire County Council
County Hall
Hertford
SG13 8DN

Dear Mr Leech

Application for a variation of Conditions 17 and 23 of Planning Permission 3/1439-97 to extend the life of an existing materials recycling facility at Waterhall Quarry Complex, Lower Hatfield Road, Hertford

Thank you for your letter of 21 August inviting comments on the above planning application and for your subsequent agreement to extend the deadline for submissions so that the Parish Council could consider its response at its meeting on 19 September 2007.

The application to extend the permitted life of the recycling facility by four years to 31 August 2014 is based on the argument that, although infilling of Southfield Wood will have been completed during 2007, there are still significant void spaces at Bunkers that will not be filled until 2014 at the projected rate of input of about 155,000 tonnes p.a. (comprising about 80,000 tonnes of waste processed by the recycling facility and 75,000 tonnes going directly to Bunkers).

The Parish Council believes that this argument is fundamentally flawed because it relies on what appears to be an incorrect assertion in paragraph 4.01 of the application that the same types of waste are permitted to be deposited at Bunkers as have been used to fill Southfield Wood. Paragraph 4.01 states that "Waste categories licensed to be deposited at Southfield Wood and Bunkers are Categories A and B. Limited amounts of Category D waste (such as rubber tyres, wood, paper, incinerator ash) are permitted under later modifications to the site licence". In fact the Parish Council's understanding (which has been confirmed regularly by County Council officers at meetings of the Waterhall Liaison Group) is that the planning conditions for Bunkers permit only Category A (inert) waste to be used for infill in order to prevent water pollution.

The real purpose of the application (and in particular the amendment sought to Condition 23 which would place Bunkers on the same footing as Southfield Wood with regard to linkage to the operation of the recycling facility and the types of waste which can be used for infilling) therefore appears to be to seek a significant relaxation of the infilling restrictions presently attaching to Bunkers by bringing it within the scope of Condition 48, which hitherto has applied only to Southfield Wood and confines the deposit of Category B and D waste to just that site.

For this reason, in the view of the Parish Council, the application has implications which go far beyond its stated purpose of extending the life of the recycling facility and raises significant environmental and pollution concerns about the infilling of Bunkers. The Parish Council therefore strongly opposes the application.

Additionally, the Parish Council has concerns about the following matters which would cause it to object to the application even in the absence of the overriding Bunkers infilling issue described above:

1. The stated reason in Permission 3/1439-97 for Condition 17 being imposed was "To ensure that the operation of the recycling facility is limited to that of infill at Southfield Wood and to ensure that a permanent use does not become established". In this context, the extension of the life of recycling operations would be totally inappropriate and conflict with reasonable hopes and expectations that recycling would cease at some time between 2007 and 2010. The primary reason why these hopes and expectations are widely held in the local community is the unsuitability of the road access to the site and the danger and congestion which is caused along the B158 from Holwell Lane to Hertford by the very large lorries transporting recycling waste to the site. The application deals simplistically with the traffic issue in paragraph 3.02 by stating that "... the site is well located in terms of the primary road network" but not addressing the inadequacies of the B158 for heavy goods vehicles. It is relevant in this respect to refer to the comments made by the Minerals Local Plan Inspector in para 3.4.167 of her 2005 report about the B158 being an "old rural road of variable width with roadside hedges and banks making it appear narrower" and understanding "the environmental concerns about its continued use for lorry traffic".
2. The discussion of Likely Traffic Movements in section 6 of the application is deficient in that it ignores movements across the B158 (between the recycling facility and Bunkers) in asserting that the limit of 400 vehicle movements a day attaching to the Waterhall complex will not be exceeded if the variation of conditions is allowed. The Parish Council understands that the County Council's position (as summarised in a note given to the Waterhall Liaison Group in February 2001) is that all movements of vehicles, including movements between the discrete areas of the complex, Bunkers, Pollards and Waterhall, should be counted against the 400 daily limit. The traffic movement analysis in Section 6 of the application is therefore not presented on an acceptable basis.

Yours sincerely

Graham Irwin
Clerk to the Parish Council