



THE PARISH COUNCIL OF HELLINGLY

The Village Hall, North Street, Hellingly, East Sussex, BN27 4DS

Tel/Fax: 01323 844108
e-mail: assistantclerk@hellinly-pc.org.uk
Website: www.hellingly-pc.org.uk

Transport and Environment
East Sussex County Council
C4 Waste and Minerals Planning Policy (AP)
FREEPOST (LW43)
Lewes BN7 1BR

14th December 2009

Dear Sirs

Waste and Minerals Core Strategy Preferred Options Consultation

Hellingly Parish Council makes the following comments on this document which was considered by the Council's Planning and Environment Committee on 16 November.

1. The Council is concerned about the process followed in this consultation and questions whether this accords with the County Council's adopted Statement of Community Involvement. In particular
 - a. There has been no meaningful notification to, nor consultation with, this Council of the impact of the proposals for Land Disposal or Waste Water treatment facilities to serve Hailsham, although the Council's preferred options for both of these matters will have a serious impact upon this Parish and its residents.
 - b. The flyer that we received advising us of the consultation gave no indication of how the County Council's proposals would affect the Parish and its residents.
 - c. There has been no attempt to hold an exhibition or meeting within, or a reasonable distance of, the Parish at which the County's proposals could be put and residents questions/concerns addressed.
 - d. We are informed that landowners within the area of search have were not consulted/approached prior to the commencement of the consultation resulting in embarrassment to some landowners whose land is within the areas of search
2. The consultation draft repeats proposals for waste disposal that were considered at some length and dismissed as part of the preparatory work for the Council's adopted Waste and Minerals Plan 2006. But no reasoned explanation is provided of any changed circumstances that would justify the inclusion of the so recently rejected earlier proposals.
3. It was confirmed at a recent meeting with Officers that the present proposals derive from little more than a desktop study with the intention that more detailed work will follow after the consultation. I If this is the position then it means that there will have been no robust consideration of options other

than those preferred by the Council raising the distinct possibility that the plan will be found to be unsound at examination

4. **Spatial Objectives.** We support these. However the County's preferred options for Land Disposal conflict with Objectives SO1 (achieving reductions in waste and driving the management of the waste hierarchy), SO4 (protection of the environment), SO5 (management of waste close to the source of generation to minimise transportation), SO7 (land disposal as a last resort), and SO8 (appreciation of climate change).
5. **Waste Recovery and land disposal capacity (Issue W2).** In opting for medium waste growth as opposed to low end growth the Council's preferred option W2b will fail to deliver the Councils Spatial Objectives. In particular
 - a. Disposal to land raise site will not encourage greater emphasis upon the importance of achieving the waste hierarchy (SO1)
 - b. Will not support waste to energy and will not encourage the necessary investment in, and the importance of creating, new energy from waste facilities (SO2)
 - c. Will not protect nor enhance the exceptional countryside in the Low Weald (SO4)
 - d. Will not result in the management of waste close to the source of generation nor encourage communities to take responsibility for the waste they create (SO5)

Of the three options this Council's preference is for option W2c. We agree however with the decision not to accept London waste

6. **Waste Management and the Waste Hierarchy (Issue W3).** We support the option that will divert the minimum to land fill
7. **Distribution of Strategic Facilities (Issue 4).** We support Option W4e but with an amendment to the final sentence to read "Specific identified sites in the AONB/intended SDNP should be allowed where no demonstrable environmental harm would arise and where justified on grounds of sustainability" Similar amendments should be made to the fourth paragraph of Policy CS4
8. **Waste Recovery Sites (Issue 5).** We support Option W5e. We consider that the recovery process should take place within buildings that in view of their likely size would be best located on industrial sites near to the point at which the waste arises as opposed to being located on Greenfield sites some distance away in open countryside
9. **Land Disposal Facilities (Issue 6).** In so far as there is a residual need for Land Disposal Sites we support option W6d. We are totally opposed to the wording of Policy CS6 where this encourages land raise sites within the A22 corridor as a means of land disposal. Land raise is an extremely poor method of dealing with waste disposal and is unsustainable
 - a. It will necessitate the transportation of large quantities of waste over long distances thereby adding to the cost and increasing carbon emissions
 - b. Transportation will necessarily be by Heavy Goods Vehicles. The A22 is already inadequate to carry existing volumes of traffic and any increase in HGV movements will only exacerbate the present delays, jams and driver frustrations
 - c. The Killed and seriously injured on our local roads are already the highest in the area and further traffic is likely to create more accidents with an equal rise in the above figures
 - d. It will encourage vermin
 - e. It will create odours
 - f. It will create gases that are known to adversely affect / destroy plants and shrubs

- g. It is unsightly and obtrusive in a flat landscape creating artificial mounds as much as 25 or more metres in height
- h. It is a poor use of valuable farming land
- i. Ancient woodlands, shaws and hedgerows that characterise the Low Weald countryside will be adversely affected / destroyed

We are of the firm opinion that

- land raise should be the last not the first resort
- greater importance should be given to the reduction of waste and to recycling
- the County Council's proposals fail to encourage the conversion of waste to energy
- there is greater capacity to deal with the waste than is suggested in the background papers and that the County's proposals place insufficient reliance upon the potential for existing sites at Pebsham and Newhaven and for a new site at Ashdown Brick works to cope with the demand which may in itself be over estimated if a stronger policy of "reduce, reuse and recycle" were to be followed
- construction and demolition waste should be dealt with on site as a condition of any approvals for redevelopment
- all new waste sites (recovery and disposal) should be as near as possible to the point at which the waste is generated

We are opposed in particular to any selection of a land raise site within the Broad Farm Area of Search on the grounds that it would

- (a) be close to homes, primary school, village hall, leisure and tourist facilities, listed buildings and a conservation area
- (b) be visually intrusive within the flat open landscape
- (c) worsen growing traffic congestion on the A22, A267, A271, Coldharbour Road and other local roads
- (d) cause environmental damage by reason of airborne pollution, the accumulation of leachate, vermin, smell and disturbance.

We also question the suitability of the geology of the area for land disposal given the existence of a geological fault running east West across the area of search and that almost one third of this area (the northern part) is, according to the British Geological Survey map (1:50,000), made up of Tunbridge Wells Sandstone.

8. **Waste Water (Issue W7)** Insufficient consideration has been given to the problems of the limited capacity of the two sewage works at Hailsham to accommodate the likely increase in demand arising from proposed housing growth. We agree that further examination of all options is required. In principle we are opposed to any option that would result in discharges to the Cuckmere which remains one of the Country's few undeveloped river valleys and where the potential for damage to the environment and the local ecology is at its greatest. At least one of the options would involve the discharge of partially treated sewage to a point above a drinking water abstraction source

Finally Hellingly Parish Council should be a key stakeholder/ consultee on any proposals involving land within the Parish and should be engaged directly in any further consultations affecting the Parish.

Yours faithfully

Clerk to the Council

Cc: Councillor Roy Galley
Wealden District Council
Pine Grove
Crowborough (by e-mail)