

Secretary of State  
Government Office for the South East  
Surrey & Sussex Planning Team  
Bridge House  
1 Walnut Tree Close  
Guildford GU1 4GA

Friday, 07 July 2006

**Ref Brighton & Hove Planning Application BH2006/00900 – Hollingdean Depot materials recycling facility and waste transfer station, granted June 19, 2006**

Dear Secretary of State

I am writing to ask that this planning decision be called in for a Public Inquiry on the following grounds:

***1. Development fails to pursue sustainable development in an integrated manner***

- 1.1 This development would fail to adequately comply with national policy contained in PPS10 and PPS1 which state that development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles of sustainable development set out in the UK strategy. Local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.
- 1.2 In this case, Waste Local Plan policies were not used to ensure that sustainable development was pursued in an integrated way and the development is likely to undermine efforts towards the environmental, social and economic regeneration of the Neighbourhood Renewal Area in which it is located.
- 1.3 We believe that undue attention was given to the desire of the administration to fulfil the requirements of the waste contract PFI operator, Veolia, to find a convenient site suitable for this purpose whilst running roughshod over community and local councillor concerns about harm to quality of life in this area.

***2. Development fails to comply with PPS10 'Identifying suitable sites and areas'***

***21i) "In deciding which sites and address to identify for waste management facilities, waste authorities should assess their suitability for development against each of the following criteria:***

**(third bullet) the cumulative effect of previous waste disposal facilities on the well-being of the local community, including significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential**

**(fourth bullet) the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport”**

- 2.1 With regard to the third bullet point the main significant impacts on the community's well being can be summarised thus;

*environmental quality:* increase in road traffic, with resultant congestion and higher vehicle pollutant levels which will likely result in an extension of an Air Quality Management Area. Higher dust and airborne pollutant levels, noise pollution and longer operating hours. Significant impact on school and homes adjacent to site.

*social cohesion and inclusion:* the site is located within a Neighbourhood Renewal Area, one of the most deprived wards in the country targeted for special government regeneration. This application has had and continues to have a deeply divisive effect on social cohesion with school staff and governors, local councillors, community groups and residents deeply opposed to it. Over 2000 letters of opposition were received by the local planning authority

*economic potential:* the site could be used for other employment generating enterprises, without the adverse environmental social and environmental effects

- 2.2 The total reliance on road transport is not only counter to advice, but also dismisses any potential use of the railway track which runs alongside the site. The surrounding road network is under strain already, and extra vehicle movements, especially of 44 tonne lorries will exacerbate existing problems. In addition, even after the proposed bridge works are complete in Hollingdean Road, that roadway will be a hostile, intimidating and dangerous place for pedestrians and cyclists to use.

### **3. The development represents a departure from local development plans**

- 3.1 There are several failures to conform to policies within the Local Plan and Waste Local Plan, which I understand our Brighton & Hove City councillors will be drawing to your attention under separate cover.

Finally I note your letter of June 16 addressed to Mr A Breckenridge, which dismisses a request to call in the application for your own determination in advance of the LPA decision being made. I understand the issue being addressed in your letter was whether to call in the project before LPA determination, and not whether

permission itself should or should not be granted. I find it surprising therefore that this decision is being used to justify a refusal to consider calling in the decision itself. At the time of your decision you would neither have been in possession of all the arguments which were presented at the application, nor any representations made following the grant of permission (such as this one).

I am concerned over the lack of a fair hearing in this matter and am waiting for further legal advice, but reserve my right to subsequently return to this issue.

Yours sincerely

Dr Caroline Lucas  
Green Party MEP for South East England