

HOUSE OF COMMONS

LONDON SWIA OAA

Jim Kehoe Chief Planning Officer London Borough of Bromley Civic Centre Stockwell Close Bromley BR1 3UH

23rd March 2015

In Mi Kehoe

14/04870/FULL1 - Use of land as a waste transfer station and recycling facility on Old Maidstone Road, Sidcup

I write to place on record my objection to application 14/04870/FULL1 to erect a facilitative building and recycling plant on land opposite Econ House on Old Maidstone Road.

Not only would the above proposal be contrary to UDP Policy G1 (Green Belt), it also conflicts with the Government's updated and strengthened guidance on National Planning Policy for Waste, dated 16 October 2014. In it, the Secretary of State clarifies government policy on this matter, stating that companies and councils have an obligation to first look for suitable sites outside the Green Belt, preferably on brownfield land (paragraph 6). Additionally, councils can no longer give consideration to locational needs, or wider economic benefits the site could bring, over other considerations, as justification for building waste facilities on Green Belt land.

Green Belt status is assigned to certain sites to offer a strong defence against urban sprawl in our towns and cities, and on that basis, the applicant's suggestion that the land is developable because it is 'unkempt and completely inaccessible' (Planning Statement, p.12) is both irrelevant and misguided. As you know, 'very special circumstances that clearly outweigh harm' must be demonstrated to validate planning permission on the Green Belt, however no such circumstances exist in this case. This is a point that has been made well by the CRA20ten Residents' Association.

The proposed waste transfer station would be accessible only by a very narrow road, and is in close proximity to a large number of residential properties, as well as a residential caravan park immediately adjacent the site. It would undoubtedly create unpleasant odour, dust, litter and noise, all of which would have a severely adverse impact on the amenities of the residential area, contrary to Policy ER2 (parts iii and iv). In addition to the latter, I would also highlight Policy 5.17 of the London Plan, which similarly states that applications of this nature should be evaluated against their proximity to the source of the waste. The catchment area for the proposed site includes all areas within the confines of the M25 circumference, which, I would suggest, goes well beyond what can reasonably be attributed to serving the local need.



Finally, I have very serious concerns about the hazardous nature of the waste that will be sorted on site, which includes, amongst others, batteries and accumulator wastes and asbestos. Given the history, and ongoing legal action being taken by the Environment Agency against the directors of Waste 4 Fuel on Cornwall Drive, which, on the surface, is a very similar company, and less than one mile west of the proposed site, residents' concerns are clearly well justified and this should also count against the application.

I would be most grateful if you could circulate this letter to Members in advance of the Committee.

Bob Neill MP