

Hackbridge & Beddington Corner  
Neighbourhood Development Group  
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Environment and Neighbourhoods Directorate  
Executive Head of Planning and Transportation  
London Borough of Sutton  
24, Denmark Road  
Carshalton, Surrey  
SM5 2JG

Your reference D2012/66220/FUL

9 October 2012

Dear Mr Cook,

I am writing on behalf of Hackbridge and Beddington Corner Neighbourhood Development Group concerning the Planning Application for Beddington Farmlands Waste Management Facility CRO 4TD by Viridor Waste Management Ltd submitted on 8<sup>th</sup> August 2012.

Hackbridge and Beddington Corner Neighbourhood Development Group (HBCNDG) is a Neighbourhood Forum comprising sixty local residents and businesses which is formally constituted and approved in accordance with the Neighbourhood Planning Regulations 2012 Part 3.

Our Neighbourhood Area was approved and designated on 18 September 2012. Our Area does not include the facilities proposed in this planning application, however, this area features heavily in our Neighbourhood Development Plan. The long awaited Wandle Valley Regional Park and the commercial activities which take place on Beddington Farmlands are of critical importance and relevance to the success of our Plan and therefore include the area which is the subject of the planning application as a "study area".

HBCNDG is currently consulting with the local community on the core principles of our local Neighbourhood Plan. These core principles include aspects which are relevant to the subject of this planning application including the Regional Park and a district heating network. These have received a high level of support at the events we have held this summer attended by over 100 local people and during our on-going consultation and engagement with both local residents and businesses.

The Group meets monthly and works in sub-groups in between meetings. However, HBCNDG did not call a meeting in August as it is the holiday season. HBCNDG therefore considered and discussed the Viridor Planning Application at the earliest opportunity. This was at our meeting of 25 September 2012 where we agreed the Group's response as follows.

#### **A. Objections to the Planning Application**

Hackbridge and Beddington Corner Neighbourhood Development Group objects to this Planning Application on the following grounds:

- 1. Local blight and the failure to meet previous promises of compensatory benefits related to Beddington Farmlands by the Applicants and the Local Authority partners behind this application**

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a) **Local blight on the area.** Local residents have had to put up with the blight of living near to a waste management site for many years and if this proposed application for an ERF is successful, this will blight the area for another thirty years. When considering this planning application, none of our Group said they would choose to live near an incinerator or accept all the waste from not just our own Borough but three other Boroughs as well. And we would like to ask you as you read this letter to consider whether you would like to.

b) **Previous promises of benefits for local residents in return for accepting waste management made by the applicant and the local authority have not yet been delivered**  
Viridor and Sutton Council are suggesting that there will be benefits to local residents in return for accepting this plant. But promises made to local residents about benefits at the time of previous planning applications concerning waste management at Beddington Farmlands have not been kept or delivered. In the 1990s local residents were told that in return for granting permission for a landfill site until 2015 we would get a wonderful nature and country park which we could all use and which would be a haven for wildlife. This nature and country park together with Beddington Park and the Mitcham Common would represent the largest green open space in South London forming the heart of the Wandle Valley Regional Park. Since then the deadline for the landfill site was extended to 2023 and the restoration is now nine years overdue. Local residents have not been happy about this but have felt powerless to do anything about it. Still in 2023 we expected that there would be an end to this local blight and we have been told that we will soon see some of the benefits we had been promised.

Now, however, despite the fact that we still have not received the promised benefits, Sutton Council, together with the other three boroughs which form the South London Waste Partnership and Viridor are proposing to inflict this new blight on our local area for a further twenty five years and introduce a new worry for us of concerns for our health due to air pollution and a further negative impact on the value of our homes.

c) **Not a suitable location being within a Public and Nature Park**  
The design of the plant is quite attractive, but the chimney is very tall and the whole plant is not something you want to see from your window or within our promised new Regional Park. There will be a negative impact on public enjoyment of the nature and country park due to the large scale industrial feature dominating the landscape. This proposal would compromise the ethos of the Wandle Valley Regional Park and Nature and Country Park potentially presenting a disincentive for the public to visit the site (being blighted by an incinerator) which would have direct negative economic impacts for environmental businesses operating within the area and related to the park.

## 2. **Loss of Metropolitan Open Land**

Planning permission should not be granted because the site proposed is on Metropolitan Open Land which is designated for the Nature and Country Park and the Wandle Valley Regional Park.

The ERF would represent a permanent loss of 3.35% of Beddington Farmlands SMI and a blight on the landscape of the Wandle Valley Regional Park.

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The recent successful challenge to the use of MOL for housing north of the BedZED development sets a strong precedent for the retention of MOL lands — a limited and finite resource — and the resistance to any change of use.

**3. Negative impact on wildlife and biodiversity**

Planning permission should not be granted at this location as it is a haven for migrating birds and rare wildlife such as tree sparrows.

The ERF development would result in 6.27ha loss of wet grassland- a critical habitat in the restoration plan which addresses the requirements of the main conservation target species- Lapwing, Redshank and Yellow Wagtail. Yellow Wagtail was rendered extinct as a breeding species due to landfill commencing at Beddington Farmlands and the wet grassland habitat was implemented in the restoration plan to reverse those negative impacts.

**4. Negative Health, Environmental and Economic Impacts**

Group members visited the Viridor Lakeside ERF plant near to Heathrow in a trip kindly organised by Viridor, but were not reassured, but rather further alarmed by this visit. We could smell the localised air pollution, it seemed wasteful to burn recyclable waste and not to use the heat generated by this plant. We could see that very few jobs were needed to operate the plant.

HBCNDG consider that this application should be rejected because the approach will lead to negative health and environmental impacts and provide a lower economic benefit than recycling. These objections are set out below as follows:

- a) **Recycling has a lower environmental impact and creates a higher economic benefit** - The four Boroughs should be aiming to achieve higher recycling rates of around 70% more quickly as an alternative. This has been shown to be possible in a number of local authorities in the UK and internationally. Recycling has been proven to have a lower environmental impact and create many more jobs than incineration. We fully understand that all residents in the four Boroughs share this responsibility to meet such targets with their local authorities, and that not every resident participates in recycling as much as they should do.
- b) **Negative effect on local resident's health from air pollution.** The planning application admits that even modern incinerators emit pollutants to air. We are concerned about the effect on our health if this plant is built and operated.
- c) **There are better technological options** such as Anaerobic Digestion (AD) to produce compost from food waste and Mechanical Biological Treatment (MBT) both of which would reduce the volume of waste which might remain and need to be burned. This would reduce the scale of any energy recovery plant. For this reduced fraction, there are also other technology options such as pyrolysis or gasification which is used commercially in the UK and which we understand has a lower environmental impact and lower and safer emissions to air. We have had to carry out this research ourselves and are not technology experts, but we are of the opinion that the proposed technological approach is inferior and has only been chosen by Viridor as a simple lower cost approach, not because it is the best or safest approach.

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- d) **Wasted energy through not using the waste heat** – the amount of waste heat generated from this large plant would require an extensive heat network extending miles into the surrounding neighbourhood to make sure it was used. Viridor have not ensured that this waste heat is used in any other of their energy recovery plants. Even if permission is granted with one or two connections such as to the Felnax project as proposed in the planning application, we believe that it is likely that the vast majority of the heat will be wasted. This is not acceptable in a time when we are all working to save energy at home and at work in order to mitigate the green house effect and dangerous climate change.
- e) **The approach proposed will not bring the optimum Carbon balance** – considering these factors we do not think that the approach taken will deliver the optimum carbon balance, or meet the emissions performance standard set out in the London Mayor’s Municipal Waste Strategy.

**B. Proposals for Actions before planning permission is granted and mitigating benefits if planning permission is later granted**

We do object to the planning application and would prefer that planning permission is not granted and that an alternative proposal is developed.

However, if the planning authorities are minded to grant planning permission then we strongly request;

- a) the following information and reassurances provided through engagement with local residents ahead of planning permission being granted and;
- b) legally binding mitigation measures and local community benefits if planning permission is subsequently granted.

Considering each objection in turn as follows:

**1. Local blight and failure to meet previous promises related to Beddington Farmlands made to residents by the Applicants and the Local Authority partners behind this application**

- a) The applicants have already promised to deliver Wandle Valley Regional Park and this should therefore still be delivered in full at the earliest opportunity.
- b) The new promise about the Regional Park made in this planning application, though welcome, is the main benefit that we have been waiting for in return for the previous grant of planning permission in the 1990s for the landfill site and so this should not be considered as a mitigating benefit for this new planning application as is inferred in the current planning application.
- c) We are greatly disappointed that the Applicant has so far failed to deliver on the previous mitigating benefit offered of a Regional Park. We consider that **any further benefits offered should be made legally binding as a condition of planning permission being granted.**
- d) In line with the Government’s Waste Strategy we propose that the community be offered significant new and additional benefits proportionate to the blight of an Energy from Waste plant in the neighbourhood for twenty five years and the likely profits to be made by the Applicant.

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**Wandle Valley Regional Park and Nature Park**

We propose that the benefit of the Regional Park is to be delivered at the earliest opportunity working with HBCNDG and other relevant stakeholders and that some additional measures offered to supplement this, as part of a package of mitigating measures described in the following points 2-4. New measures related to the Regional Park could include:

- a) The full integration of the restored area into the Wandle Valley Regional Park and the Hackbridge Project to ensure the optimum connection of communities with the nature and country park
- b) To provide visitor and information facilities adjacent to Hackbridge and to public transport to make Hackbridge into a main gateway to the heart of the Wandle Valley Regional Park. This will contribute significantly to realising the vision of Hackbridge becoming the UK's most sustainable suburb by investing in facilities that will bring visitors and commerce to Hackbridge, creating local employment and educational resources and providing an on-going legacy for a sustainable future for the community.
- c) To improve the area in the field North of Bedzed to create an area of interest.
- d) Improvements to include ecological and environmental activities, consistent with the ethos of the Nature and Country Park specifically for the benefits of people- e.g. arts and crafts, nature activities, eco-hub attractions, outdoor learning facilities etc
- e) To secure access to Beddington Farmlands via Irrigation Bridge to create a central linkway between the River Wandle and the restored area through Hackbridge (identified as the central Wildlife Corridor in the Neighbourhood Plan)
- f) The commissioning of a large conservation body e.g. The Wildfowl and Wetlands Trust (the founders of the London Wetland Center) to ensure the effective and successful implementation of the restoration plan and the management of public access

**2. Loss of Metropolitan Open Land**

As MOL is a limited and finite resource there is unlikely to be any mitigation of the loss in quantity of open space, however we urge that mitigation be required to improve the quality of open space provided, for example in the following terms:

- a) Improvement in its amenity value through investment in community, sports, and research facilities in the MOL area;
- b) Improvement in its habitat value through investment in conservation projects in the MOL area
- c) The location of the ERF to be moved to the extreme margin of the MOL- along side Beddington Lane to minimise the loss of habitat and reduce the negative impact on the landscape of the Wandle Valley Regional Park to a minimum
- d) The enhancement of other areas of Beddington Farmlands MOL which are currently outside the restoration plan- i.e. the field North of Bedzed, 100 acre and the South East Corner

**3. Negative impact on wildlife and biodiversity**

Suggested mitigation measures would include:

- a) The location of the ERF alongside Beddington Lane so that there is no loss of wet grassland
- b) The extension of wet grassland/ wet land habitat to include 100 acre

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- c) The construction of wildlife habitat in the field North of BedZED. There are mineral deposits in the field North of BedZED which could be exploited and restored to lakes to form an attractive setting.
- d) The inclusion of the South East corner in to the restoration plan and ecological management of the habitat

4. **Negative Health, Environmental and Economic Impacts**

Members of the HBCNDG have approached this proposal in a professional and serious manner. We have attended all the meetings organised to discuss these proposals and also carried out our own research. We invited Viridor to meet with us, and were grateful that they did. The meeting was informative and somewhat reassuring.

Whilst we appreciate that a process has been followed and expert advice has been sought by both Viridor and the SLWP, we are not satisfied that the best or safest waste management or technological approach has been offered by the tenders received by SLWP and subsequently chosen by SLWP as set out in point 4 previously. We are the people who will have to live next to the plant, not the applicant or the SLWP. We request that the Planning Authority acknowledge and respect Government Policy to involve local people in a more meaningful way in making decisions such as this.

**a) Request for impartial expert advice paid for by the applicants and SLWP before Planning Permission is granted.**

We request genuinely impartial advice on waste management and recycling systems and technology options taking into account health, environmental and economic considerations. We suggest that advice be sought from respected experts in the field and based on proven experience not experimental technology. We would like to seek this advice out ourselves, taking counsel from the Applicant and SLWP as to whether these experts are reputable. We propose that the cost of this be paid for jointly by the Applicant and the South London Waste Partnership.

**b) Request for a genuine participatory approach with the community to develop a workable solution which is agreeable to the local community before Planning Permission is granted.**

We request that the Applicant and the Local Authorities discuss the options and expert advice received with local residents perhaps using a mediation service. This participatory approach could lead to a much more robust and better solution and result in genuine community support for the resulting solution. HBCNDG propose that we could administer and manage this process given our local representative status and that we would work with the Applicants and SLWP to keep costs down and genuinely use the process to come to a workable solution.

**c) Review of potential for higher recycling rates before permission is granted.**

We request that the four local authorities of the SLWP set out their plans to recycle waste and discuss expert advice on what recycling rates might be achievable in discussion with the community before making their final decisions on scale of plant and before planning permission is granted.

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**d) More stringent Air Pollution mitigation and monitoring to be sought and contractually obliged if planning permission is to be granted**

Subject to the advice received from experts, we would like to see sorting of waste before it goes in to remove the most dangerous pollutants such as those contained in batteries and more stringent air quality monitoring than that proposed in the Planning Application. We would like to see monitoring of PM 2.5 and any other pollutants associated with the ERF involving the local neighbourhood development group in partnership with the Environmental Agency to ensure that the ERF effect on local air quality is negligible as stated in the planning application. Also we propose immediate mitigation or shut down of the ERF if pollution is discovered in Hackbridge.

**e) Legally binding contractual obligation that 100% of the heat generated to be used if planning permission is to be granted**

We propose that the implementation of a heat network and the use of all the waste heat be a legally binding condition attached to planning permission.

**f) Legally binding community benefit of low cost heat if planning permission is to be granted**

We request that if Planning permission is granted that the community benefits offered include a contractual obligation to provide low cost heat and a community stake in any heat supply company.

We understand that you will not reply to our points raised, but hope that nevertheless you will take them into account.

We will therefore follow up on the issues raised and suggestions set out in this letter with Viridor, the London Borough of Sutton and other stakeholders.

Yours sincerely,

Helena Barrowclough  
Chair  
Hackbridge and Beddington Corner Neighbourhood Development Group  
07982246923

cc

Tom Brake MP  
Chief Executive, London Borough of Sutton  
Chief Executive, London Borough of Kingston  
Chief Executive, London Borough of Merton  
Chief Executive, London Borough of Croydon  
Chair, South London Waste Partnership  
Chief Executive, Viridor  
Nicky Gavron, Chair, London Assembly Planning Committee,  
Stewart Murray, Asst Director, Planning, Greater London Authority  
Samantha Wells, Case Officer, GLA