

Hackbridge & Beddington Corner
Neighbourhood Development Group
www.hackbridge.net

Environment and Neighbourhoods Directorate
Executive Head of Planning and Transportation
London Borough of Sutton
24, Denmark Road
Carshalton, Surrey
SM5 2JG

Your references: D2012/66220 and 227701/SM

8 April 2013

Dear Mr Cook,

I am writing on behalf of Hackbridge and Beddington Corner Neighbourhood Development Group concerning the revised Planning Application for Beddington Farmlands Waste Management Facility CR0 4TD by Viridor Waste Management Ltd submitted on 25th February 2013 and the proposal by the applicant for mitigation and planning obligations dated 12 March 2013.

This letter is further to our considered and very detailed response to the initial planning application of 8th August 2012 submitted on 4th October 2012 and takes the points raised there into account in this response. As stated before in more detail, the Group recognises that we all need to take responsibility for our waste and that landfill is not a good option. The Group met on 3rd April to discuss this revised application and the mitigation measures proposed and we agreed the Group's response as follows:

Hackbridge and Beddington Corner Neighbourhood Development Group continues to object to this Planning Application despite the revised application and mitigation measures proposed.

Neither the minor revisions to the planning application put forward, nor the mitigation and planning obligation measures proposed by the applicant, address the substantial points which we raised as reasons why the applicant should not be granted planning permission, which are as follows:

- 1) **The status of this land is Metropolitan Open Land and so it should not be built on.**
- 2) **Location in the middle of the long promised Wandle Valley Regional Park which could be a lovely wildlife haven and public park is unsuitable** for an industrial plant with a 95 metre chimney.
- 3) **The site is subject to previous planning conditions on the applicant not yet complied with.**
 - a) The Wandle Valley Regional Park was a promise made in a previous planning condition and should be fulfilled in full at the previously promised dates of either 2015 or 2023 and not with an industrial plant with a tall chimney in it.
 - b) The non-committal references to carrying forward the previous promise about the Regional Park and conservation "where relevant" made in the planning application and letter of March 12th, though welcome, were the main benefit that we have been waiting for in return for the previous grant of planning permission in the 1990's for the landfill site. Therefore this should not be considered as a mitigating benefit for this new planning application as is inferred in the planning application and the associated letter of the 12 March 2013.

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- c) The commitment to the early closure of the landfill (Point 11 12/03/13) does not mention when the Wandle Valley Regional Park will be opened. There is no benefit as the same number of lorries will come and we will just replace the landfill site with an incinerator.

4) **Other locations in the area scored higher in the SLWP assessment.** If we must continue to accept waste arriving in the area from four London boroughs then other sites scored higher in the previous SLWP assessment. Site 14 had a higher score as it reduced habitat fragmentation and the impact on the Regional Park. Thames Water want to sell this site, so there is no reason why this location could not be considered as an alternative.

5) The case for the demand for such a large plant has not been made or addressed in the revised planning application or the mitigation and planning obligations.

A much smaller plant with higher recycling rates in each of the four boroughs would create more jobs and reduce the environmental impact of the proposed plant.

- a) **Fewer jobs** - Recycling has been proven to have a lower environmental impact and create many more jobs than incineration. We saw for ourselves on our visit to the Lakeside incinerator that a handful of workers can operate such a plant contrary to the non-committal point 10 stating that Viridor is “keen” and “will endeavour to create ... jobs” in the mitigating measures letter of 12 March.
- b) **Recycling rates could be doubled in the time the plant is being built negating the need for such a large plant.** The applicant and the four boroughs should be aiming to achieve higher recycling rates of around 70% and more quickly as an alternative which would reduce the size of the plant. This has been shown to be possible in a number of local authorities in the UK and internationally. We fully understand that all residents in the four boroughs share this responsibility to meet such targets with their local authorities. But the applicant and SLWP have not demonstrated that they will work to achieve these recycling rates. Indeed, since this planning application was submitted the London Borough of Sutton has just cancelled its food waste collection.

6) The applicant has not addressed the negative effect on local resident’s health from air pollution

- a) The planning application admits that such an incinerator emits pollutants to air which harm human health.
- b) The applicant has gone some way to addressing that in the revised application by adding chemicals to the fire and increasing the height of the chimney stack by 10 metres. But does this sound like a responsible approach in the 21st century? The solution to pollution is not dilution.
- c) We welcome provision of additional air quality monitoring.
- d) We continue to be concerned about the effect on our health if this plant is built and operated.

7) The applicant has not responded to many requests from residents to investigate other better technological options which could reduce negative health, environmental impacts in the revised application.

- a) Technologies such as Anaerobic Digestion (AD) to produce compost from food waste and Mechanical Biological Treatment (MBT) would both reduce the volume of waste remaining and needing to be burned and so reduce the scale and impact of any energy recovery plant.

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- b) For the remaining reduced amount of waste, 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.
- c) We remain of the opinion that the proposed technological approach is inferior and has only been chosen by Viridor as a simple lower cost approach in order to maximise profits for the company, not because it is the best or safest approach.

8) The applicant is providing no guarantees or plans or proposals to assure that the heat generated in this process will all be used and not wasted.

- a) Whilst the applicant has offered £50,000 towards a CHP working group to promote the use of the waste heat, this money could be used up in a few months on one technical study and is not sufficient to address this issue.
- b) Viridor have not ensured that this waste heat is used in any other of their incinerators . 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 greenhouse effect and dangerous climate change.
- c) Just because legally binding assurances of this sort have not been made before, that does not mean that Sutton should not ask for them. We have the Climate Change Act now. Sutton has set legal precedents of this sort before and could do so again.

9) The Education Centre sited at the proposed ERF plant is not a mitigating benefit. If it is similar to the education centre we visited at the Viridor Lakeside plant then this is a public relations centre for the benefit of the applicant and is not for the benefit of the community. There is a need for an education and visitor centre within the Wandle Valley Regional Park but it should be located near to the public transport arrival points and be designed as part of the implementation of the Park, not as part of an incinerator.

We would like the Applicant and the Planning Authority to acknowledge and respect Government Policy to involve local people in a more meaningful way in making decisions such as this.

We request genuinely impartial advice on waste management and recycling systems and technology options taking into account health, environmental and economic considerations.

We request that the proposals and potential mitigating measures are discussed with local community organisations in the affected area and reflect what the local community want. Whilst we have met with the applicants we have not seen any evidence that any of our concerns or ideas have been properly considered.

Once again, 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 suggestions set out in this letter with Viridor, the London Borough of Sutton and other stakeholders. We are grateful to Councillor John Drage for convening such a meeting to take place on 16th April 2013.

Yours sincerely,

Helena Barrowclough
Chair, Hackbridge and Beddington Corner Neighbourhood Development Group 07982 246 923