

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

**Representation by Hackbridge and Beddington Corner Neighbourhood Development Group to the
Development Control Committee Meeting of 15th May 2013 regarding the proposed ERF.**

I am speaking as a member of Hackbridge and Beddington Corner Neighbourhood Development Group on behalf of the Group. We are also working closely with Beddington Residents Association and Beddington Bird Group and support their views.

As our Chair Helena told the Committee in April, our Neighbourhood Plan has two jewels, the Wandle Valley Regional Park and becoming a sustainable suburb aspiring to one planet living, a Sutton Council policy.

Taking first the Wandle Valley Regional Park; this planning application, with its mitigating measures; including the two additions made since the 24th April of a Community Liaison Forum and monitoring the Carbon Intensity Floor; are not sufficient on planning grounds to justify this loss of Metropolitan Open Land and the fact that this proposed ERF would completely change the character of this section of the Wandle Valley Regional Park.

Considering sustainability; the new proposed planning condition to monitor the Carbon Intensity Floor and the mitigating measures as proposed do not guarantee that the heat will be used or the Carbon Intensity Floor will be met. It will only be met if the waste heat is actually used, as noted by the Council's Planning Officers. And for a plant of this huge scale, it is a lot of heat, it is broadly equivalent to the electricity that will be produced, at around 20MW, and is enough to serve at least 25,000 homes with heating and hot water, that is, 25% of Sutton residents. Using the waste heat in a heat network to these homes and buildings would save 35,000 tonnes of CO₂, that is, 13% of Sutton's CO₂ emissions as set out in Sutton's one planet living action plan. This sort of heat network is almost unheard of in the UK and would require considerable investment, perhaps £250 million, and the commitment to make it happen.

The proposed ERF being so big, makes full use of that heat more difficult to achieve and we have argued that this ERF is bigger than we need. The council officers say that the four boroughs need is for 160,000 tonnes of residual waste to be dealt with. Commercial waste is easier to recycle, so we do not see the need for 300,000T capacity. Reducing the scale of the ERF could allow more suitable locations to be considered, such as not in the Park, it would reduce air pollution and transport impacts. In fact, why not have one ERF in each borough? We recognise that this would require new planning applications.

The Group continue to object to this application and we think that you and Viridor should work with the community to come up with a better proposal. But, if you are still minded to grant planning permission for this ERF, then we request, Please, that you Must ask for changes and mitigating benefits consistent with the scale and with the impact of the loss of MOL and complete changing of the character of the long awaited Wandle Valley Regional Park. The £2.2 million and other measures offered are not enough and will not deliver the benefits inferred in the Application. We request that changes and mitigating measures should include:

Sufficient funds to actually create the Wandle Valley Regional Park with a visitor centre in a suitable location, which is not at the ERF, and access to the Park over the railway bridges.

An Air Quality Action Plan with sufficient funding to reduce air pollution arising locally to offset the acknowledged 0.8% rise in air pollution noted in the report in an already high air pollution area.

A reduction in the scale of plant. At least, please refuse the extra 10% of operating capacity requested in the application, because this increase came after the public consultation & adds to air pollution, traffic and other impacts.

Finally, we have four points concerning the heat network. Funds of £250,000 should be provided to carry out more detailed technical and business plan studies for a heat network, to include retrofitting to existing local homes, not just to large users and developers. In addition, funds of around £500,000 should be allocated to pay for heat pipes to go to the site boundary in Beddington and over the railway line to Hackbridge. We would like the community to have representation on the proposed CHP working group and a recognition that community involvement and community benefit through low cost heat are essential to making a success of a heat network as people will not necessarily connect to it. Lastly, we would like to see conditions placed on Viridor to ensure the productive use of the heat from 20% in year 1 to 70% by year 5 of operation of any ERF.

If the committee would like us to explain any of these points in more detail we would be happy to. Thank you.