Communication and Access Strategy At: Beddington Farmlands

February 2024

Prepared by :INNOV8PLANNING: for:



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Glossary

BNG Biodiversity Net Gain

BFBG Beddington Farmlands Bird Group

CMS Conservation Management Scheme

CSG Conservation Science Group

DfT Department for Transport

DoV Deed of Variation

EA Environment Agency

ERF Energy Recovery Facility

ERMP Extant Restoration Management Plan

FAS Flood Alleviation Scheme

GLA Greater London Authority

HMP Habitat Management Plan

LBS London Borough of Sutton

LEMP Landscape and Ecological Management Plan

LRM Landscape Restoration Masterplan

MEC Main Effluent Carrier

MoL Metropolitan Open Land

NPPF National Planning Policy Framework

NPPG National Planning Practice Guidance

Revised Restoration Management Plan

RRMP Statement of Community Involvement

SCI Site of Importance for Nature Conservation



SINC Site of Special Scientific Interest

SSSI Click or tap here to enter text.



Context

Beddington Farmlands has a long and complex planning history. In recent years the area was exploited for deposits of sand and gravel. The void created by the mineral extraction was subsequently filled with controlled wastes and the site served as a strategic landfill site for South London. Once landfilling was replaced with energy recovery, the infill of wastes ceased and the final landfill cell is current being utilised for an inert material fill – serving as an opportunity for development projects in South and South-West London to dispose inert material.

However throughout this time and the long term vision for the future of the site has remained unaltered.....

'In 60 years it is anticipated that the Beddington Farmlands site will be one of the foremost nature conservation areas in Greater London. The site will comprise a unique assemblage of terrestrial habitats including wet and acid grasslands, heaths, meadowlands and aquatic habitats such as lakes and reedbeds.....

This diverse range of habitats will provide opportunities for many species which are of considerable conservation significance both nationwide and The habitats will also be of intrinsic value in themselves with a diverse flora and structure, They will serve to replace habitats which have seen significant declines across the country and London in particular as well as offset habitat losses at the site as a result of operational activities'.

(extract taken from the extant RMP)

In order to achieve this, previous planning approvals have been secured following approval of a Restoration and Management Plan (RMP). The most recent RMP was predicated on 7 Objectives which were provided in the overarching Conservation Management Scheme ('CMS').

These 7 objectives can be summarised as follows:

Objective 1 To develop and manage key habitats on site for the main target species of Lapwing, Redshank, Tree Sparrow and Yellow Wagtail

Objective 2 To develop and manage key habitats on site for the main target species associated with ecologically immature wetland habitats

Objective 3 To develop and manage the site for passage migrant wildfowl and passerine community by appropriate hydrological management

Objective 4 To develop and manage the site for breeding reedbed species and for wintering species



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Objective 5 To develop and manage the site as a continuing part of a wider Site of Metropolitan Importance for Bats

Objective 6 To increase the biodiversity of the site by restoring sustainable area of habitat

Objective 7 To create an appropriate level of public access to allow enjoyment of the restored landform (Noting that the provision of free roaming access to the Farmlands prior to the successful establishment of the site's habitats would be in direct contradiction with Objective 7 and the RMP).

However, over the last few years it had become apparent that the currently approved RMP may not be achievable/sustainable. For further information on this please refer to the Planning Statement that also accompanies this planning application.

This Communication and Access Strategy has been written in support of a planning application that has been submitted to amend the restoration of the site and, as a result, amend the RMP. As part of this process it was considered prudent to revisit the previous Access Strategy to reconsider options and opportunities that were brought about by Objective 7 above.

Approach to the RRMP was to build upon the success of existing habitat creation and achieve a RMP that serves long term interests:

- Sustainable solutions
- · Works with natural environment
- · Considerate of existing habitats
- Operationally/economically sustainable
- Maximising Biodiversity Net Gain potential
- Use of the Biodiversity Metric to compare recommendations in a consistent way
- Impacts of Climate Change

By the same token the RRMP presents an opportunity to revisit the approved access proposals. To this end, this document is provided in response to the 7th objective which in its totality states:



Objective 7 – considers the development of public access and site use that is sympathetic to the nature conservation interests of the area yet does not detract from the value of the site for amenity use. Generally speaking, secretive or shy bird species are likely to be more vulnerable to noise and visual disturbance. It is thought that wader and wildfowl species may be especially sensitive to disturbance. For example, an analysis of the responses of waders and wildfowl to disturbance found that a passive, low-level and continuous disturbance is likely to lead to habituation and active, high level and continuous disturbance is likely to lead to the displacement of many bird species from the disturbed area, leaving only very tolerant species⁴.

Waterfowl populations, including migratory wintering birds, are sensitive to disturbance in both feeding and roosting areas. Excessive disturbance can result in reduced food intake and/or increased energy expenditure. This disturbance can be especially damaging during winter months when energy expenditure is high and intake is low.

If birds are displaced they may have to fly long distances due to the lack of similarly sized suitable areas of habitat within the London conurbation. It is therefore essential that disturbance of sensitive areas is minimised and some parts of the site are completely free of human access. The landscape restoration plan sets out to provide screening of areas of public access from areas of sensitivity such as the wet grasslands.

Table 2-1 provides a summary of the ground conditions and features that are required to meet these conservation objectives, these being discussed in greater detail in the management prescriptions and implementation schedule.

The presence of a large human population in close proximity to the site necessitates close management of public access to ensure the success of restoration activities on habitats created to retain/maintain/attract key species identified in the first 6 objectives of the CMS.

This is reflected in the LBS Beddington Farmlands Access & Communications Scoping Document ('the Scoping Report') dated October 2022 which states that:

Waterfowl and waders, specifically on the North Lake and Phase 3 Wet Grassland have been frequently recorded making flight responses to disturbance stimuli (people walking) along paths adjacent to those water bodies. Species' disturbance response is highly variable, with wintering waterfowl aggregations, predominantly Shoveler Spatula clypeata and Teal Anas crecca, and resident and migratory waders throughout the year, displaying the most significant disturbance / avoidance response. Repeated disturbance events can result in aggregations or individuals moving to different water bodies where feeding opportunities are not sufficient or vulnerability to predation increases.

However, the urban setting will facilitate opportunities for local people to enjoy and experience wildlife on their doorstep. This document identifies how public access will be provided and managed through the provision of permissive footpaths, permissive footpaths/cycleways and strategically placed bird 'hides'.

The primary aim of this document is to highlight development and management practices that will be adopted to ensure that the key features of the Beddington Farmlands will be accessible to all visitors without disruption of the key ecological features outlined in CMS Objectives 1-6.



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In addition, to this the Communication and Access Strategy provides a further option which has not been included previously – namely an east-west link across the site. Whilst previous proposals included (and implemented) a north-south permissive path – no east-west link was proposed. It is now considered that if an east-west link is not provided it would represent a wasted opportunity to link the predominantly residential area of Hackbridge (including Hackbridge Station) with a large employment area in Beddington. To this end an east-west link would reduce reliance on cars for, inter alia, residents of Hackbridge who work in Beddington by allowing them to either walk or cycle.

Notwithstanding this, the Communication and Access Strategy is predicated on aim of providing the area with a rare opportunity to connect with nature. The Scoping Report provided an aspiration for the site which was effectively communicated by the following evocative vision:

The public will have access to a panoramic viewpoint at the centre of the site from which they will be able to observe the wheeling display of Lapwings in Spring and hear the atmospheric call of Redshank. In Summer they will be able to watch bats foraging along hedgerows and woodland edges and catch glimpses of Britain's largest bat, the Noctule, hawking high over the lakes in the early evening. In Autumn and Winter visitors will be able to experience flocks of wildfowl on open water or even elusive Bitterns sheltering in the reedbeds.

There is a dichotomy at the heart of the proposal. The urban surroundings and densely populated area of, inter alia, Hackbridge, will present opportunities for local people to enjoy and experience wildlife. However, the presence of a large human population in close proximity to the site necessitates close management of public access to ensure the success of key species.

To this end public access will need to be carefully managed through the provision of strategically placed footpaths, cycleways and hides to ensure that access is provided without disruption of key ecological processes. The Site Warden and RRMP Site Manager need the flexibility to respond to ecological circumstances on Site and use communication tools appropriately to manage access.

How this dichotomy is achieved is addressed in this Communication and Access Strategy document and associated access development proposals.



Description of Site

The Site is an 88.4ha area of a former landfill site, located in Beddington, London, UK (approximate centre grid reference: TQ 290 663).

The site is bound to the east by the Beddington Energy from Waste facility and Beddington Sewage Treatment Works, to the south by Beddington Park and to the west by the residential area of Hackbridge and Hackbridge railway station. The Thames Water land know as '3 corner field' and '100 acre lagoons' lies to the north of the Site.

The land uses further from the Site comprise a mix of commercial, residential and industrial uses, as well as Micham Common and Beddington Park. The Site is of strategic significance and will form part of the Wandle Valley Regional Park upon completion. Land uses further from the site comprise a mix of commercial, residential and industrial uses.

Existing access to the Site is from Coomber Road which services an industrial estate and links to the Site at the northeast boundary. There is a permissive path that runs along the western edge of the Site and construction work to create an accessible route has commenced pursuant to the extant planning permission. There are no Public Rights of Way (PRoW) within the Site. PRoW's are approximately located 0.3km from the northwest of the Site, and 0.2km to the southwest, respectively. The Wandle Trail, a National trail, is situated 0.4km to the south in Beddington Park.

Ecologically there are two habitats within the ERMP that were found to be unviable going forward. These are Acid Grassland and Heathland. Acid Grassland and Heathland were found to be unviable as the underlying soil (and other potentially available restoration soils) is the opposite pH than required. An amendment from Acid Grassland / Heathland to a meadowland habitat is therefore proposed.

Stantec has also comprehensively reviewed the water availability on Site and engaged with the Environment Agency to confirm the potential long-term viability of the wet grassland habitats as part of this Planning Application.

The ERMP included the creation of habitats to support four key target bird species identified within the Conservation Management Strategy (CMS) Report (SLR, July 2012): lapwing, redshank, tree sparrow and yellow wagtail. Other objectives included improving the site for other birds, passage and wintering bird species, bats and other fauna, whilst ensure public access. The RRMP is still focused on creating habitats for target species whilst enabling local residents to have appropriate access to the Site.

The RRMP would deliver a number of additional public benefits in comparison to the ERMP, including:

- Habitats that are viable and sustainable in the long term;
- Permissive east to west linkage route across the Site;
- A dedicated full time onsite RRMP Site Manager;

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- Automated gates at key points across the Site;
- Additional flood storage and reduced flood risk to surrounding areas;
- A Visitor and Agricultural Shed for livestock and the storage of machinery with barn owl boxes and rainwater harvesting integrated into the design;
- An uplift in BNG
- A financial contribution towards off site signage and lighting.

The site falls within the auspices of the Wandle Valley Regional Park.

The vision for the regional park '....is for an innovative, sustainable and high quality Regional Park in the Wandle Valley that is easily accessible, with a rich and thriving biodiversity, offering recreation, landscape, heritage, cultural and resource management benefits in which local people and businesses can take pride and ownership. To promote the park not just as a collection of green spaces, but an interconnected system that can benefit communities, living and working in the Wandle Valley'.

Four local nature reserves are located to the west of the site:

- Wandle Valley Wetlands LNR 950m to the west;
- Spencer Road Wetlands LNR 1km to the west;
- The Spinney, Carshalton LNR 900m to the south east; and
- Wilderness Island LNR 600m to the south east.



Design Evolution and Influence

This section provides a precis of the evolution of the access design which helps illustrate how the proposed access design has evolved to the scheme present with the revised restoration and RRMP as described in full in Section 3.

This section of the report demonstrates how the access strategy has evolved over the last 6 years.

1) Approval of details required by condition 42 of Planning Permission reference D2012/66220/FUL dated 12 February 2018.

This proposal represents the extant scheme approved following the submission of a details pursuant to condition 42 of D2012/66220/FUL. This proposal includes ingress/egress from the existing access points on the western boundary and includes a link to the south-east corner of the site. It includes circular paths around Northern and Southern Lake and various transects over the meadowland to the south of the site.



FIGURE 1 - EXTANT RMP



2) LBS Scoping Report



FIGURE 2 - LBS SCOPING ROUTES

The LBS Scoping Report proposed the north/south permissive path with a year-round path circum-navigating the south lake. The proposal also included a southern circular route across the site (amber) which would be open in between Autumn and the Spring and a central inverted y shaped path (orange) that would be open in the Summer.

This proposal was predicated on ensuring effective habitat management and failed to grasp the opportunity of the provision of linkage opportunities between Hackbridge and Beddington. This proposal failed cognisance to the wider need to reduce reliance on, inter alia, cars and improve opportunities to walk/cycle.

3) RRMP Consultation Access March 2023

Cognisant of the need to limit disturbance of key ecological site a scheme whilst promoting a linkage footpath scheme was tabled in the restoration masterplan workshop. The aim of the scheme was to stimulate debate and precipitate discussion on the holistic requirements of the site's access arrangements. At the workshop the scheme was roundly criticised as having lack of forethought however it achieved its purpose as it helped the project team identify the key aspirations of stakeholders with regard to access.

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Proposed Footpaths



FIGURE 3 - CONSULTATION DRAFT VERSION

4) Hackbridge & Beddington Corner Neighbourhood Development Group Report

Dated 6 April 2023 provided a 'response' to the above scheme tabled at the * March Workshop whereby:

- 1. The community would like to propose 3 internal high quality 'made' paths highlighted in yellow on the map below:
 - North/south to Beddington Park, following a majority of the original Sustrans route, with the inclusion of a culvert crossing and the southern end
 - Mile Road bridge to Wandle Vista panoptic viewpoint, at the highest point of the landfill
 - East/west, from Beddington Lane, linked to Hackbridge via part of the north/south and viewpoint routes



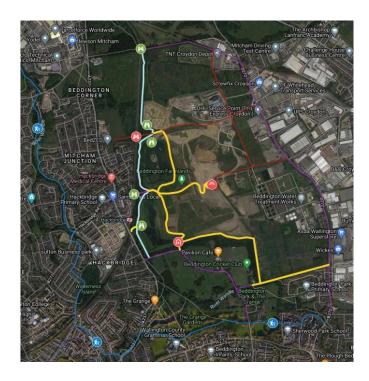


FIGURE 4 - HRA SUGGESTED ROUTES

This proposal proffered several ingress/egress points to dramitically improve connectivity across the site. Whilst increased connectivity reduces reliance on cars and encourages walking and cycling, the scheme as proposed relied on the use of third partY land which could not be guranteed. Moreover the number of ingress/egress points would increase habitation disturbance which would have contravened CMS objectives and would be proved very diffcult to manage on a day to day basis.

5) LBS Pre-app Meeting No 1

At the first meeting held between London Borough of Sutton and representatives of/consultants for Valencia Waste Management presented the following access scheme. This included an additional route across the meadlowland. However, this still didn't address the east/west deficiencies.





FIGURE 5 - VALENCIA 2ND DRAFT

6) LBS Pre-app Meeting No 2

The following plan was the presented at the second pre-app meeting

Red - North-South Link and Amenity Route

Blue -West Link Pedestrian Route

Yellow - July to September Amenity Route

Green - October to June Amenity Route



FIGURE 6 - VALENCIA DISCUSSION DRAFT

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Prior to the second pre-application meeting this rudimentary scheme was tabled to LBS Officers responsible for bio-diversity on the Farmlands and the authors of the LBS Scoping Report with the primary aim of the securing support for the east/west link. Tacit agreement was secured for a link running from the ingress point to the north of northern lake and egress close to the ERF and Beddington Way.

7) LBS Pre-app Meeting no 3

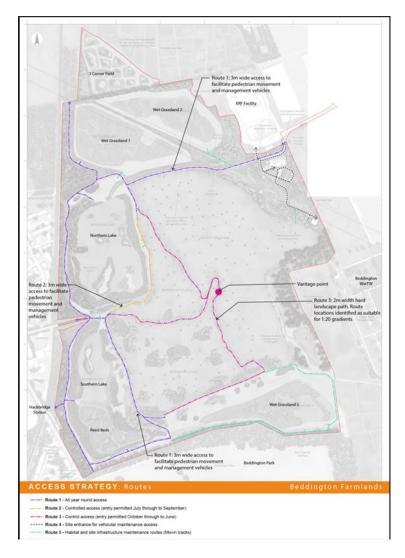


FIGURE 7 - VALENCIA PRE-APP DRAFT

The proposed access scheme promotes five route types:

• Route 1 (Blue) – Provides a year-round permissive link accesses

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- Route 2 (Yellow) Provides controlled amenity access permitted between July and September
- Route 3 (Pink) Provides controlled amenity access permitted between October and June
- Route 4 (Grey) Vehicular access for maintenance
- Route 5 (Green) Maintenance Route

On the pre-app call is was advised the blue route around the easter part of the southern lake is likely to require seasonal constraint. It was also suggested that temporary, interim footpaths should be provided – however this would not help secure the other 6no. CMS objectives which seek to develop and maintain species with the maturing habitats and therefore the footpaths will be constructed and maintained but will not be opened until an agreemnt has been made with Valencia, LBS and the site Warden.



1 Introduction

1.1 Introduction

This statement supports a planning application for the revised Restoration Management Plan (RRMP) of Beddington Farmlands.

The Site comprises a former landfill site, identified for closure in 2023 in the Development Plan and which is now in its restoration phase. The restoration involves, inter alia, the importation of soils to achieve a suitable landform, provision of public access routes and habitat creation to form a nature conservation site.

The Applicant has reviewed the long-term viability of the habitats approved within the Extant Restoration Management Plan (ERMP) and is proposing amendments as part of this planning application to ensure they are ecologically sustainable. Details on target species that habitats could support, as well as habitat restoration, controlled public access routes, fencing, amenity, wetland /grassland creation boundary treatments and access points across the Site, as well as management plans for each habitat are included within the Application. A draft Deed of Variation to the s106 Legal Agreement is also included within the Application to assist with the determination process.

The Proposed Development comprises:

"Proposed revised restoration and revised restoration management plan for the Beddington Landfill Site and implementation of the restoration works ("the development")".

1.2 Planning History

There have been a number of planning applications relating to the wider Energy Recovery Facility site and Beddington Farmlands. The most relevant applications are set out below.

The main planning history of the site comprises:

2005 Planning Permission (D2005/54792/FUL)

The following planning permission was granted on the 5/9/2005:

"Extension of an existing waste management Centre comprising the construction of a plant for AD of household waste and 2 additional gas engines, the lateral extension of landfill activity to encompass a lagoon, the export of clay from the base of the existing LF phases and formation of a temporary clay stockpile, revisions to the landfill phasing plan and extension of the duration of waste management activities at the site to 2023."

Condition 40 required the submission and approval of a scheme for restoration and landscaping (a 'RAMP') within 6 months of the permission being granted.

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2013 Planning Permission (D2005/54794/FUL)

Planning permission (D2005/54794/FUL) was granted on the 13.06.13 for the following:

"Extension of an existing waste management centre comprising the construction of a plant for the anaerobic digestion of household waste and two additional gas engines, the lateral extension of landfill activity to encompass a lagoon, the export of clay from the base of the existing landfill phases and formation of a temporary clay stockpile, revisions to the landfill phasing plan and extension of the duration of waste management activities at the site to 2023."

Part C of Condition 41 on the decision notice for application D2005/54794/FUL states the following:

"Final restoration of the site is to be completed on or before 31st December 2023."

2014 Planning Permission (2012/66220/FUL)

Planning permission was granted in 2014 (ref: D2012/66220FUL) for the following:

"Phased demolition of existing buildings and development of an energy recovery facility (ERF) and buildings ancillary to the ERF, construction of two combined heat and power (CHP) pipelines, revisions to the approved restoration plan for the Beddington landfill site, amendments to the existing in-vessel composting operations, removal of existing access and provision of new access road and reconfiguration of access to Thames Water site to north."

2015 Planning Permission (D2015/72898/FUL)

A subsequent planning permission (ref: *D2015/72898/FUL*) was granted on the 25/01/2016 and as set out in the description of development, is an amendment to the 2013 Planning Permission.

"Variation of Condition 13 of previously approved application D2005/54794/FUL, to permit the disposal of Local Authority waste between 13.00 and 16.30 for six Saturday afternoons in any one calendar year."



Condition 41 and 43 on the decision notice state the following:

"The development shall be constructed in accordance with the approved RAMP as detailed in Version 5 (13-1595 3204 D18 v5, dated 23/06/14) submitted under condition 40 of planning permission D2005/54794.



2 Summary of Development Proposals

Public access will be managed through the provision of footpaths, cycleways and strategically placed hides to ensure that the best features of Beddington has to offer will be visible for all visitors without disruption of key ecological processes. Electronic gates, signage, Beddington Farmlands website and education regarding appropriate behaviour will help to manage access as well.

The Access Strategy has therefore been designed to balance the competing demands of nature conservation and public access for recreation. As illustrated by the Figure below, year round access would be possible along the existing permissive path along the western boundary of the Site and around the Southern Lake (Route 1). Access from the permissive path into the Site would be controlled via automatic gates.

Across the northern part of the masterplan a route from east to west, is proposed thereby linking the industrial and residential areas, and has been sensitively located to minimise impact on the proposed habitats. The east to west path (Route 2) would be open for the public to use during daylight hours but closed at night to help mitigate against potential anti-social use of the path. Automatic gates are proposed at either end of this route to help manage access.

Access along the eastern edge of the Northern Lake would be permitted during the summer and access to this path would be managed by the Site Warden to take account of seasonal variations on site each year (Route 3). Route 4 would provide access up to the Vantage Point and provides three paths across the Meadowland Habitat.

As shown within Figure 10 below, access is seasonally controlled, to limit disturbance to important habitats during bird breeding times in the calendar year. This control will be achieved by lockable and automatic gates along the public routes to prevent access during sensitive periods and reduce disturbance for adjacent habitats. This disturbance will be further mitigated though the boundary treatments along public routes within these zones, which are as follows:

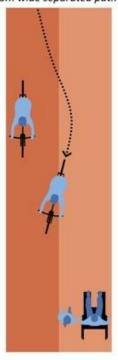
Public access routes to be 3m in width;

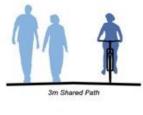


3m wide separated path

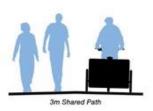


3m wide separated path









- 2m mown grass margins either side of path;
- Native hedgerow (proposed at 1.2-1.5m in height and 2.5m in width); and
- Post & wire stockproof fence (in areas where grazing cattle will be present).

The proposed access scheme promotes six route types:

- Route 1 (Purple) Permissive path and southern lake loop
- Route 2 (Green) East/West link shared path
- Route 3 (Yellow) Northern Lake connection
- Route 4 (Magenta) Former landfill routes
- Route 5 (Grey) Vehicular access
- Route (Turquoise) Habitat and site infrastructure



FIGURE 8 - PROPOSED ROUTES



2.1 Route 1 – Purple

This includes the already operational Permissive Path that runs north/south along the western border of the site will remain accessible up to 364 days of the year and will not be subject to pathway use restrictions that will be required for the Amenity Paths.

This route provides a link between Mitcham Common to the north and Beddington Park to the south. This route is already accessible. The route also benefits from existing bird hides – one of the hides provides views of the Southern Lake and the remaining two hides provide views of the Northern Lake.

Route 1 will also be augmented by a circular link around the southern lake and an access point into the site from Hackbridge Station. This element of Route ...

2.2 Route 2

Route 2 provides an east/west permissive path across the site. The path links Beddington with Hackbridge via the extant north/south permissive path. It will be accessible during daylight hours but closed at night to help guard against anti-social behaviour.



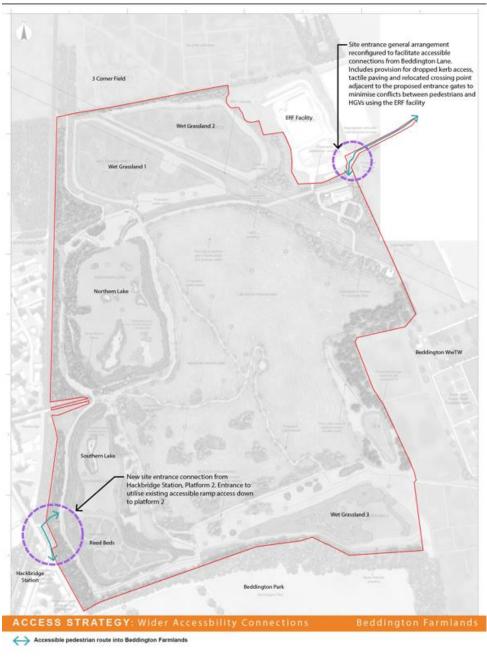


FIGURE 9 - CONNECTIVITY

This route will not be seasonally constrained and will be suitable for both pedestrians and cyclists.

It will be accessible during daylight hours but closed at night to help guard against antisocial behaviour.

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2.3 Route 3

Route 3 provides a seasonal route around the eastern edge of the northern lake and will, in conjunction with the extant north/south permissive path provides a circular walk around northern lake.

The route will be seasonally constrained and opening will only be allowed on the instruction of the site warden.

Bicycles will not be permitted.

2.4 Route 4

Route 4 provides seasonal routes across the landfill linking Route 2 with the site vantage point and Route 1.

The route will be seasonally constrained and opening will only be allowed on the instruction of the site warden.

Bicycles will not be permitted.

2.5 Route 5

Route 5 provides vehicular access to the visitor building/agricultural shed via Beddington Lane. This route will not be used by the general public.

2.6 Route 6

Route 6 provides habitat and site infrastructure maintenance routes – particularly around West Grassland 3. This route will not be used by the general public.

To ensure that visitor presence does not adversely affect the bird assemblages during key periods, seasonal amenity routes will be established across the site. Routes will be designed to maximise variability ensuring that each visit offers an ecologically immersive experience. The Beddington Farmlands Website and onsite signage will be important tools to helps communicate access across the Site throughout the year.

Those visiting the site once every couple of months will see different habitats from alternating perspectives, whilst those visiting daily will witness the progress of the seasons and the changes in flora and fauna that brings. Changing routes will be controlled by steel gates, wide enough to permit operational vehicles and be locked with coded padlocks when the route is closed.



Seasonal access routes will be illustrated on maps integrated into site signage but also available through the various communications outlets as described in this Communications Strategy.

Please note that the Access Strategy omits the linkage footpaths proposed by Hackbridge Residents Association to provide ingress/egress to the south-east corner of the Farmlands site was discounted for a number of reasons, namely:

- It was considered the ecological disturbance may not be adequately mitigated and by their very nature the linkage paths need to be open up to 364 days of the year to achieve the necessary accessibility
- The introduction of a footpath in this location could cause residential dis-amenity for residents of Crispin Terrace
- Alternative footpaths that transect Beddington Park (to the south) are considered almost equally commodious
- The additional ingress/egress points would be difficult to manage, maintain and control

2.7 Built Form

The alignments of all routes have been considered for accessibility use; therefore, all pedestrian access paths are compliant with DfT (Inclusive Mobility Guidance) and maintain gradients which do not exceed 1 in 20.

Pedestrian only routes will be 2m in width, whilst shared maintenance/pedestrian routes will be 3m width. All routes will feature verges of 2m minimum either side which will be routinely maintained to ensure the routes are clear from vegetation and accessible.

A crushed aggregate surface dressing will be applied to all routes, the aggregate fines will be suitably rolled and of a size to accommodate wheelchair access. Cambers will be designed into all routes to facilitate drainage run off whilst the permeable nature of the crushed aggregate surface dressing will also provide a secondary drainage measure.

2.8 Fencing

Landfilling of Beddington Farmlands ceased in 2019 but the site still remains an active landfill and will continue to 2028. This classification of 'active landfill' is due to the ongoing decomposition of contained waste and the production of methane gas which is extracted and used to generate electricity.

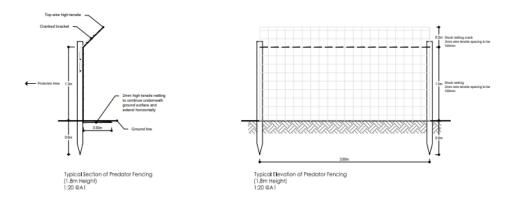
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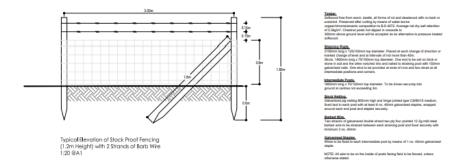
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In order to manage the gas and leachate there abstraction/monitoring wells located across the landform. These represent a significant risk as any damage to those wells could be expensive and potentially cause a hazard. To this end public access will be confined to the proposed footpaths only and agricultural style boundary fencing will be required to keep members of the public away from this infrastructure as well has the sensitive habitats. Native hedgerows will also be planted up against the boundary fencing, initially to soften the hard materiality but in time the hedgerows with appropriate management will form a dense secure line. Once hedgerows are fully established, particularly around the former landfill part of the site, the boundary fencing will be incrementally removed.

Many of the wells will be enclosed into the grazing paddocks by stock fencing with at least two lines of barbed wire and hedgerows.

To this end there will be various types of fences required to perform different functions.







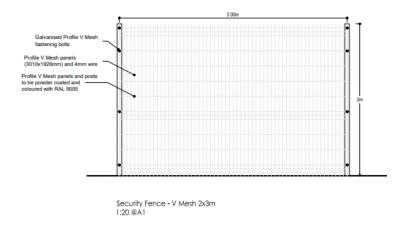


FIGURE 10 - FENCE DETAILS



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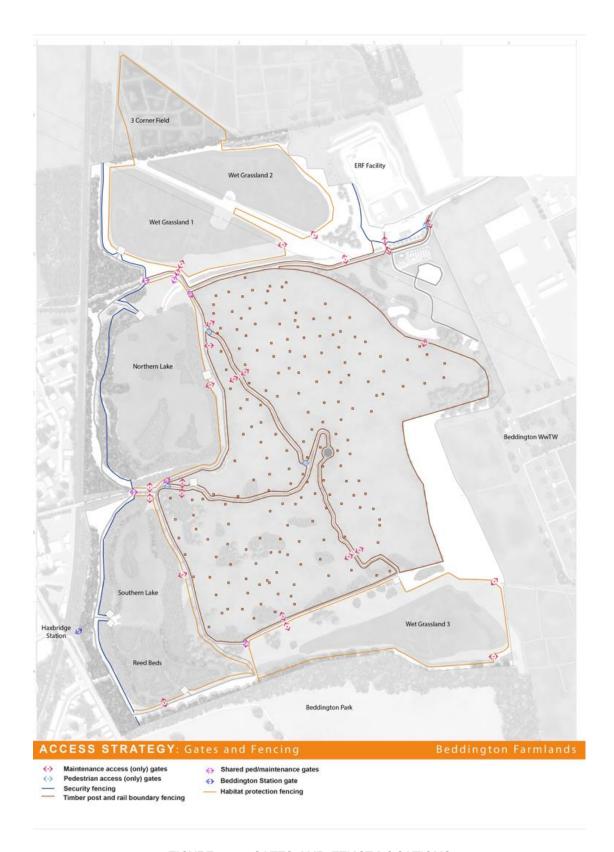


FIGURE 11 - GATES AND FENCE LOCATIONS

2.9 Gates

Gates on the site play an important role for permitting/restricting public access to the various routes which can independently be locked at times of the year to ensure the various habitats on site are protected. Additionally, providing access to some of the fenced off habitats for routine maintenance activities and restricting public access to some of the waste management infrastructure dotted around the site.

The gate types documented within the proposed restoration plan are as follows:

• Existing Vehicular Maintenance Gates:

There are locations where gates have been installed, these will be retained in the restoration plan and their locations are shown in Figure 10.

• Proposed Vehicular Maintenance Gates:

Proposed vehicular maintenance gates are mainly located at locations where predatory fencing controls sensitive habitats. Access to these areas will only be permitted to management operatives taking care of the site.

• Shared Pedestrian/Vehicular Maintenance Gates:

Vehicular maintenance vehicles will make use of the proposed walking routes to access the wider site. To facilitate this movement, shared pedestrian/vehicular gates are proposed at various location shown in Figure 10.

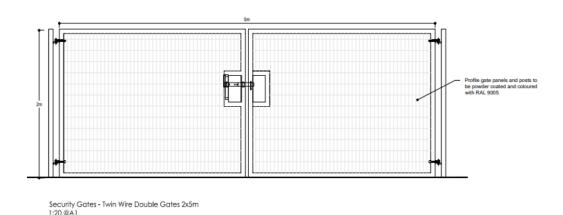


FIGURE 12- GATE DETAILS



Proposed Pedestrian Gates:

Where access isn't required by maintenance vehicles (mainly the former landfill walking routes), single swing pedestrian gates are proposed. The locations of these are shown in Figure 10.

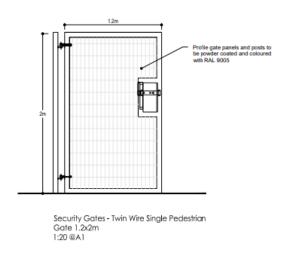


FIGURE 13 - GATE DETAIL

2.10 Hides

There are 3 existing bird hide locations which are accessed via the permissive footpath all year round, the locations of these are retained in the revised restoration plan. The Beddington Farmlands Bird Group BFBG have been a key stakeholder to identify appropriate locations where new bird hides will be installed. The proposed locations are demonstrated in Figure 13 and a description of these is set out below:





FIGURE 14 - HIDE LOCATIONS

Proposed Hide 1 - Visual Migration hide

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The hide is positioned to sit south of the North Lake facing north at the crest of this portion of the mound. It is a popular sky watching location during the migration seasons.

Proposed Hide 2 - Phase 3 Wet Grassland Hide

Hide to sit at the northernmost tip of Phase 3 outside of the fence line facing roughly southwest. The hide is placed atop embankment so that the viewing slots are not obscured by the P3 fence and is set back sufficiently so that foxes cannot exploit it to gain access to Phase 3 Wet Grassland.

Proposed Hide 3 - Reedbed Hide

Hide to sit on the southern bank of reedbed lake facing north west. The hide will look down this channel offering a deep view into the proposed reedbed.

Proposed Hide 4 - North Lake

Hide to sit on the west side of the pathway at the same level facing west. It is placed to give good views of the gap between to two large central islands and towards Elands Island.



2.11 Interpretation

The location of the proposed signage and interpretation boards is shown on Fig XX below.

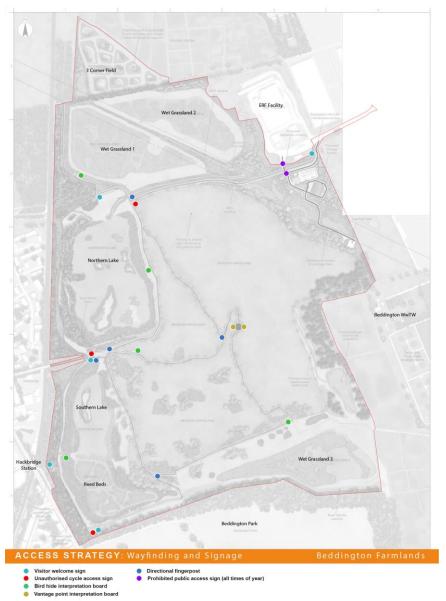


FIGURE 15 - INTERPRETATION BOARD LOCATION

Visitor welcome signs are to be erected at all ingress points into the site. Signs prohibiting cyclists and scooters will be erected at the entrance to all Seasonally Controlled Amenity Footpaths.

The aim of the interpretation boards is to provide visitors with knowledge, interest and appreciation of the site. The boards create an interaction between visitors and the fauna and flora they can see. They provide real-time educational opportunities.

The precise wording of the boards will be formulation in conjunction with the CSG and can be approved by LBS as a condition on any forthcoming planning approval.

2.12 Off-site Provision

The site will require off-site sign posting in order to inform visitors how to access the site. It is not within the gift of Valencia to develop signage outside of its ownership. Therefore off-site signage will be delivered by way of a Planning Obligation which will provide funds for off-site signage provision.

2.13 Visitor Accommodation

The ongoing maintenance of the site will require storage for plant and machinery and therefore an agricultural shed has been proposed. This will also include a site office to provide welfare facilities for the restoration manager. Within this there will be an opportunity to provide a meeting point for the CSG as well as providing welfare facilities for, inter alios, the site warden and the ecological monitoring consultants.

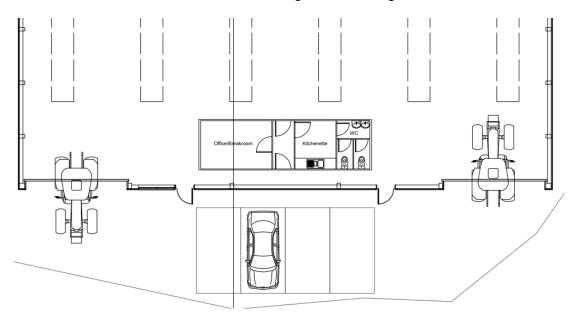


FIGURE 15 - OFFICE CONFIGURATION

This building will be located close to the site entrance – providing easy of access for visitors. Please note that this will be secure on an appointment basis only and will not be open to the public.



FIGURE 17 - SHED LOCATION

2.14 Post Restoration Access Phasing

The extant RMP states that 'public access will only be implemented once the restoration areas are fully functioning and the ecosystems have been established and monitored'.

Following the creation of each habitat, establishment will take years of careful conservation management, starting with the initial five-year aftercare period which is designed to ensure that it is both appropriate and effective. During the aftercare period, access will gradually increase as habitats establish and the sensitivities of the species that both live on and visit the site settles.

The previous 2019 Restoration Management Plan v9.1 (Point 21) confirmed that 'public access will only be implemented once the restoration areas are fully functioning and the ecosystems have been established and monitored'. This will remain and be determined by the Site Warden in conjunction with the CSG.

In the short term phased access to the site could be delivered through a programme of tours, events and open days with increasing regularity during the Aftercare Period years. There are three key aims of this phased access approach;

- 1. Increase low level disturbance to build species resilience and habitualisation to visitor presence
- 2. Provide periods of increased disturbance to monitor and capture species responses to disturbance stimuli
- 3. Provide sufficient time for critical vegetative screening of the most sensitive of habitats as different avian species will respond differently to increased visitor presence.

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It is therefore essential that, while a contradiction, both habitualisation and vegetative screening are developed concurrently to meet the sensitivities of different species.

Once the landfill becomes inactive and the landfill gas well heads are removed areas beyond the public access routes may become available to roam and fencing removed accordingly - however fencing to maintain the ecological integrity of the created habitats will be retained.

2.15 Post-restoration Management

Based on advice provided in the Scoping Document the following opening hours for the seasonal routes will be adopted and restricted to.

Spring (March - June) 0730hrs - 1430hrs

Summer (June - September) 0730hrs - 1430hrs

0730hrs - 1430hrs Autumn (September – December

0830hrs - 1430hrs Winter (December - March)

Seasonal closures will be habitat and species based and determined by the Site Warden.

2.16 **Temporary Access Strategy**

In the short term Phased Access to the Farmlands could be delivered through a programme of tours, events and open days with increasing regularity during the Aftercare Period years.

There are three key aims of this phased access approach;

- 1. Increase low level disturbance to build species resilience and habitualisation to visitor presence
- 2. Provide periods of increased disturbance to monitor and capture species responses to disturbance stimuli
- 3. Provide sufficient time for critical vegetative screening of the most sensitive of habitats

Different avian species will respond differently to increased visitor presence. It is therefore essential that, while a contradiction, both habitualisation and vegetative screening are developed concurrently to meet the sensitivities of different species.

To deliver effectively on Objective 7, the site Warden and CSG will need to be able to determine whether or not increased public access has an impact on the nature conservation value of the site. To do so will require a robust Bird Disturbance Monitoring Programme that collects pre-access, phased access and full access data to determine if

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Access Strategy

there are responsive changes in species distribution, abundance and community composition.

Open Days will only be promoted locally and will be managed by staff and volunteers on gates. This will present an opportunity to help spread the word about the site, its purpose, future and site rules. The site will be open for several hours and key habitats and species will be monitored for disturbance.

Once habitats have been created and inherent species have established the Warden will consider opening the seasonal routes. However, these routes will only be open for periods when the Site Warden considers that any incumbent species are not likely to be unduly disturbed – especially during breeding season.

As breeding seasons vary for different species it is imperative that residents are cognisant to the rules of the site to avoid any undue confusion or false expectation. Therefore a clear communication strategy is required.



3 Communication

There is a clear requirement for the project to develop a communications strategy that will produce and provide information for its potential visitors. As the site develops and access is increased, visitor expectations will need to be managed through effective communication. Communication will be at the heart of a positive experience for local residents and visitors who have travelled to the site

Communication with the wider community will therefore form a core part of the promotion and interpretation of Beddington Farmlands.

The CSG have suggested that either Valencia develop a Communication Strategy or that they and the CAMC take a collaborative approach to creating and funding this element of the project.

Communication will be provided in three forms:

1) Physical

The main form of physical communication will be the provision of interpretation boards. Strategically placed interpretation boards will help users gain knowledge of the ecological features they are experiencing at any particular location. Working in conjunction with the London Wildlife Trust interpretation boards will allow users identify particular types of fauna and flora thus improving visitor experiences. Valencia will also work with the CMAC to identify the most suitable location for each board.

2) Digital

The interpretation boards will be provided in digital form for local interest groups to include on their websites. These will include:

- London Wildlife Trust
- London Borough of Sutton
- Beddington Farmlands Bird Group

3) Personal

Communication on the progress of restoration and aftercare will be provided by the formation of an information dissemination protocol. This will build on existing diarised meetings such as CSG, CAMC and HEB committee meetings.



The CSG are suggesting that either Valencia develop a Communication Strategy or that the owners and CAMC take a collaborative approach to creating this element of the project.

A set of 'brand' guidelines will need to be developed, so that all communication interfaces conform to present a consistent style. The design of a logo should also fit in with a chosen style i.e. font and palette to provide a baseline and structure to all communication interfaces. All signage (excluding health & safety), interpretation, signposts, way-posts, websites, social media etc should follow the 'brand guidelines'. This matter should be dealt with via a suitably worded planning conditions, as suggested within the submitted Planning Statement.



4 Policy Assessment

4.1 The Development Plan

This section sets out the local and national planning policies as well as material considerations which are relevant, both to the application site, and the type of development proposed. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.

The development plan for the application, the site and surrounding area comprises:

- The Sutton Local Plan 2018
- South London Waste Plan DPD 2022
- The London Plan 2021

The following table provides an appraisal of the development plan policies relevant to the site and the communication/access related development proposals (only):

Policy	Commentary	Residual Impacts
Sutton Local Plan		
Objective 5: To use the Green Belt, Metropolitan Open Land, the parks and other open spaces to protect the open feel of the borough and its biodiversity.	Once opened the amenity routes will open up Beddington Farmlands for residents and visitors to the area.	None
Objective16: To enhance cycle routes.	The north-south and east- west linkage paths will increase cycle network provision for the area linking into other established cycle paths such as Beddington Lane	None
Objective 17: To improve footpaths and encourage walking	The north-south and east-west linkage paths will encourage commuting by foot – particularly between the predominantly residential area of Hackbridge and the	None



	employment area in Beddington. The amenity paths will encourage residents and visitors to walking and utilise a valuable open space.	
Policy 5: Wandle Valley Renewal. The council will ensure that Beddington Farmlands is restored according to the Conservation Management Scheme, Section 106 Agreements and Restoration Management Plan to become the significant new element of Wandle Valley Regional Park. The council will also ensure that Beddington Farmlands provides high- quality green space, progressively becoming open to the public, and high-quality habitats for common and protected species	The footpath infrastructure will help transform site into the high-quality greenspace proposed within the policy.	None
Policy 5 The River Wandle: expand the network of walking and cycling routes, including the Wandle Trail	The proposed development will expand walking and cycling provisions.	None
Policy 22: Social and Community Infrastructure The council will grant planning permission for the development of social and community infrastructure (as defined in the glossary) where it: (i) is accessible by a range of transport modes, in particular by	The proposed development will improve social and infrastructure provision of the area. It will make walking and cycling available to local commuters and help reduce emissions associated with transportborne commuter emissions.	None



walking, cycling and public transport. (v) would not have any adverse environmental effects		
Policy 24: Green Belt and Metropolitan Open Land The council will not grant planning permission for inappropriate development in the Green Belt or Metropolitan Open Land unless other material considerations clearly outweigh the harm to the Green Belt or Metropolitan Open Land and constitute very special circumstances.	The proposed development is not considered to be inappropriate development when consider against the policy provisions of MOL.	None
Policy 25: Open Spaces The council will seek to retain the existing level of open space in the borough by: supporting improvements, enhancements, and management that improve both quality and access to existing green spaces and	The proposed development improve the quantity and quality of green space provision in the Borough.	None
working with partners and stakeholders to support and promote measures to help deliver the vision of the Wandle Valley Regional Park as a network of high quality, accessible and interconnected open spaces based around the River Wandle		
Policy 26: Biodiversity a The council will protect and enhance Sites of	The footpaths will be carefully managed to ensure that disturbance of	None



Importance for Nature Conservation, Green Corridors and biodiversity. It will ensure the restoration of Beddington Farmlands is completed to the agreed quality and implement its Biodiversity Action Plan and agri- environment schemes. Major new development should result in no net loss in biodiversity value, as assessed against the DEFRA biodiversity offsetting metric, the Environment Bank Biodiversity Impact Calculator or any metric which the council subsequently adopts formally.	the wildlife is minimised offering the best opportunity	
South London Waste Plan		
WP5 Protecting and Enhancing Amenity (c) Particular regard will be paid to the impact of the development in terms of: (i) The Green Belt, Metropolitan Open Land, recreation land or similar; (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected The London Plan	The proposed development fully conforms to this Policy.	None



Policy G1 in the London Plan seeks to ensure that London's network of green and open spaces, and green features in the built environment, are protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network	The proposed development will enhance london's green network.	None
GG1 Building strong and inclusive communities Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: (inter alia) provide access to good	The linkage routes will make the areas around Hackbridge and Beddington more accessible for non-car users	None
quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation		
GG2 Making the best use of land	The proposed development will provide a commuter route between Hackbridge and	None



To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must: (inter alia)	Beddington thus improve non-motorised transport connections and promoting sustainable travel.	
plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth		
GG3 Creating a healthy city To improve Londoners' health and reduce health inequalities, those involved in planning and development must: (inter alia) plan for improved access to and quality of green spaces	The proposed development improves access to green space and therefore supports the aims and aspirations of this policy.	None

TABLE 1 - DEVELOPMENT PLAN ASSESSMENT

South London Waste Plan

The London Boroughs of Croydon, Kingston, Merton and Sutton have jointly prepared a new South London Waste Plan (SLWP). The SLWP was adopted in 2022 and sets out the partner boroughs' long-term vision, spatial strategy and planning policies for the sustainable management of waste over the next 15 year period.

The SLWP states that the Beddington Landfill Site is due to close in 2023 and then become part of the Wandle Valley Regional Park (Appendix 3 (Ref: BF) and Paragraph 3.27).

Part E of Policy WP2 highlights that improvements / enhancements to the environment around the Beddington Sewage Treatment Works will be supported, subject to the other policies in the SLWP and the relevant borough's Development Plan.

Policy WP5 highlights that Waste Developments should contribute positively to the character and quality of the area and ensure that any potential adverse impacts of the development are appropriately mitigated.

The table and commentary above demonstrates that the proposed development in this location conforms to the development plan. The proposed development of linkage routes, amenity routes and maintenance routes lies at the heart of the various policies that look to enhance and improve recreational opportunities, opportunities to walk/cycle and increase bio-diversity.

Assessment of Compliance

The provision of access onto Beddington Farmlands complies to development plan policy which seeks to improve access to greenspaces, reduce reliance on motorised vehicles and promote London's' Green Network.



5 Material Consideration Assessment

Planning law requires that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

In the first instance the National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions.

5.1 National Planning Policy

National Planning Policy Framework

The latest version of the National Planning Policy Framework (NPPF) was last updated on December 2023.

The National Planning Policy Framework sets out the government's planning policies for England and how these should be applied. The National Planning Policy Framework is a material consideration in planning decisions. The Framework should be read in conjunction with the government's planning policy for waste (see below).

Key to the NPPF is paragraph 8 which states that:

'Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- an economic objective to help build a strong, responsive and competitive
 economy, by ensuring that sufficient land of the right types is available in the
 right places and at the right time to support growth, innovation and improved
 productivity; and by identifying and coordinating the provision of infrastructure
- a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

Paragraph 108 states

'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

(c) opportunities to promote walking, cycling and public transport use are identified and pursued;

(e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places'.

Planning Practice Guidance

Planning Practice Guidance (PPG) is an extensive online resource of detailed policy guidance provided by the Ministry of Housing, Communities and Local Government¹. It sets out how the government envisages the day to day working of the planning system in England to operate, along with the National Planning Policy Framework (NPPF).

How can positive planning contribute to healthier communities?

The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles,

How should open space be taken into account in planning?

Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure.

The proposed linkage and amenity routes will improve access to green infrastructure, provide much valued health opportunities and reduce reliance on motorised transport and therefore fully conforms to relevant policies of the NPPF and PPG series.



6 Recommendations

Access to the east/west Route 2 footpath should be prioritised as it will reduce reliance on cars and encourage walking and cycling. However, this linkage path should not result in disturbance of wildlife habitation.

As the habitats develop and hedgerows establish to provide sufficient screening, and with the aim that species will become habitualised to increased human presence, it is recommended that the amenity access routes will be reviewed by the CSG over time, with the goal of expanding access. However, the reverse may be the case and further restrictions may be required if there is evidence that routes are not protecting the nature conservation value of the site. The CSG will report their findings to the CAMC to evidence any access restrictions or changes.

There are three key aims of this phased access approach;

- 1. Increase low level disturbance to build species resilience and habitualisation to visitor presence
- 2. Provide periods of increased disturbance to monitor and capture species responses to disturbance stimuli
- 3. Provide sufficient time for critical vegetative screening of the most sensitive of habitats

Different avian species will respond differently to increased visitor presence. It is therefore essential that, while a contradiction, both habitualisation and vegetative screening are developed concurrently to meet the sensitivities of different species.

To deliver effectively on Objective 7, the CSG need to be able to determine whether or not increased public access has an impact on the nature conservation value of the site. To do so requires a robust Bird Disturbance Monitoring Programme that collects preaccess, phased access and full access data to determine if there are responsive changes in species distribution, abundance and community composition.

It is recommended that the submission and approval of a Bird Disturbance Monitoring Programme is dealt with by condition.

The Phasing and Construction programme identifies that the footpaths will be completed by Q4 2025. This will help reduce disturbance on the maturing wildlife habitats in later years.

The footpaths will then be maintained until an agreement is made with the site Warden that they can be opened to the public. It is suggested that this is secured by way of a



condition – thus ensuring opening of the site to the general public does not impinge of the other 6no. CMS objectives.

1) Access Management Strategy

Securing the site correctly and investing in suitable infrastructure to control access, primarily from the linkage paths, will be critical in the success of prompting acceptable site behaviours. In particular, proposals will need to ensure that motorised forms of transport cannot access the site in its entirety and cyclists cannot access the amenity routes.

It is suggested that full details of security measures including signage, details of closure notices and provision of CCTV is dealt with by condition.

Within 6 months of the date of this decision notice full details of footpath signage, closure notices and details of any proposed CCTV shall be submitted for approval by the local planning authority.

2) Signage

A condition is required to ensure that the site is appropriately signed to ensure that visitors expectations and behaviours are managed.

Signage will be required for:

- Opening hours
- Opening restrictions
- Prohibitive actions and behaviours

Full details of wording and location of signs can be dealt with by way of suitably worded conditions.

3) Interpretation

It is recommended that the precise wording for the interpretation boards shall be dealt with by condition.

Within 6 months of the date of this decision notice full details of wording, graphics and photographs showing the proposed content of the interpretation boards shall be submitted for approval by the local planning authority.

3) Other suggested conditions



All planting and habitat creation required in connection with the approved access scheme which, within a period of five (5) years from the completion of the scheme, are removed, fail or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority.





