



Hackbridge & Beddington Corner
Neighbourhood Development Group
hackbridgeandbc@gmail.com
www.hackbridgendg.com

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Environment Agency

**Ref: CR0 4TD, Viridor South London Limited,
EPR/GP3305LN/V0003: environmental permit consultation**

Hackbridge and Beddington Corner Neighbourhood Development Group (NDG) was established under the Localism Act 2011; formally constituted in September 2012, renewed in 2018 and more recently in October 2022. The group is made up of volunteers who wrote a Neighbourhood Plan, including planning objectives, policies, and improvements for our local area, which was formally adopted by Sutton Council in November 2018.

We write to formally OBJECT to the expansion of the Beddington ERF waste burning permit.

1. Neighbourhood Plan

- 1.1) Objective 5.3 of our Neighbourhood Plan is to ensure the air quality and the impact of this on the health of residents is improved to (as was at the time) EU standards. (See [Appendix 10](#) for the EU ambient air quality directive standards.)
- 1.2) Air quality monitoring in an area of high air pollution will allow the council and residents to make informed decisions to reduce air pollution and reduce the impact of it on residents. The Incinerator (ERF) is the single biggest source of air pollution in the borough.
- 1.3) Policy MP3 - Air Quality states: "Air quality needs to be monitored in Hackbridge for the reassurance of future and existing residents. Air quality reports will be required for all major development proposals.
- 1.4) In the event that an adverse impact on air quality is identified, proposals will only be supported if appropriate mitigation can be provided.

- 1.5) As well as monitoring air quality on the busy roads, it also needs to be monitored in respect of the ERF and the additional traffic associated with this. The NDG endeavoured to have air quality monitoring put in place before the ERF was commissioned.”
- 1.6) The whole of the London Borough of Sutton is included as an air quality management area. However, the Council’s air quality action plan 2019 is not clear about how Hackbridge is monitored and action on any mitigation taken as it does not include the ERF in its air quality action plan.

We believe that the impact of burning 35,000 tonnes more waste has not considered monitored or benchmarked the acute impact of the emissions from a topographical or climatic perspective. The EA should refuse the application as intensifying industry without any form of monitoring being mandated or a method to explicitly prove emissions are not adding to pollutants within the vicinity.

Below we set out our reasons alongside proposed mitigation should it proceed.

2. Local impact, noise, and odour:

- 2.1) The Beddington ERF site is served predominantly by two major roads, London Road and Beddington Lane. The London Road route is situated in Hackbridge and is already a major source of congestion with Council pollution monitoring showing NO₂ readings of 140ug/L as recorded by local councillor Dave Tchil. As a result, steps are now being considered to slow down this route and implement traffic calming measures. The addition of up to 10% more HGV movements in the locale, building on top of pre-existing increases, will only seek to exacerbate issues and create further issues for the local community and Council highways budgets.
- 2.2) Roads routinely used by this site show increased signs of wear and tear with Beddington Lane requiring repeat remedial works which we fear will also affect London Road if not mitigated, pushing unreasonable costs onto the local authority.
- 2.3) Large scale development has occurred in recent years in Hackbridge with the delivery of over 1,000 new dwellings, c.180 of these facing onto London Road, alongside an assisted living development and new primary school. Both the traffic and pollution from these HGVs will pose a health and safety risk to families, children, residents, and the elderly, exacerbating health concerns and serving to increase traffic on an already busy route.
- 2.4) The population is set to increase by several thousand and has adjusted the characterisation of the surrounding area to a district zone. The population increases, amenities and other factors are therefore considerably different now to when the Beddington ERF was first proposed and the impacts therefore considerably higher.

- 2.5) Local police under Sgt James Carvey have made approaches to residents and Councillors to implement GATSO cameras amongst other measures to monitor traffic and unsafe use of traffic lights along the London Road site which will be made even more unsafe with the increased traffic levels proposed.
- 2.6) Residents routinely report odour issues and general nuisance from both HGVs and the ERF site with frequent concern about venting and breach scenarios at the site contributing to loss of amenity and damage to mental health.

We therefore propose that if any increase is permitted that the following measures are adhered to:

- A. That the ERF operator funds roadside pollution monitors along London Road, Hackbridge Road and Beddington Lane.
- B. That the ERF operator provides a supplement for road damage to the Local Authority to cover any remedial work that may be required.
- C. That the ERF operator establishes a planting and maintenance program in the locale to offset pollution including roadside trees, general shrubs and plants and green spaces in the vicinity for the lifespan of the site.
- D. That deliveries to the site are made outside of peak hours and no HGVs are routed along London Rd.
- E. That all fleet associated to the permit be EV

3. Technical and Operational standards:

- 3.1) The Beddington ERF has suffered numerous breaches, approaching 1 breach per month in recent years, however, the operator has not been able to update local Councillors or constituted bodies, some of whom sit on relative committees, despite requests. Viridor claim that 'members of the Beddington Community Liaison Group [are informed] with a short update – elected representatives and community members sit on this distribution list'. There is no system to update either elected officials or the public when erroneous site activity occurs, and information is always requested. The operator Viridor does not undertake outreach to the public to explain exceedances or the outcome of investigations.
- 3.2) Recorded breaches include heightened levels of HCL indicating inadequate combustion of chlorine containing compounds such as polyvinyl-chloride. The Beddington ERF is not currently routinely monitored for several compounds, including dioxins which gives reasonable concern of the abundance of polychlorinated compounds during these frequent breach events.

- 3.3) There is no current benchmark as to pollution levels in the locale and it is therefore impossible to ascertain the impact any increase would have or what impacts have already occurred.
- 3.4) The ERF operator has also had several periods where they report performance data late, they are unable to report on emissions but has not communicated why or proposed any investment to improve this.
- 3.5) There is no current waste sorting, waste processing or magnetic apparatus at the site which has routinely suffered from combustion of pressurised containers indicating a problem with handling current waste load and the operator has not indicated it is willing to implement these.
- 3.6) The operator has expressed an inability to handle its current site and has sold some of its planning obligations and landfill site to a separate limited company where it was the majority shareholder one day before the sale.
- 3.7) Despite an expressed inability to handle its current site and the delivery of associated works stipulated in planning obligations. The operator has found time to apply for planning changes to set aside conditions which would have resulted in an extra cost for the operator, to store further diesel and furnace flame at the site yet has otherwise failed to hit planning obligations and has indicated it will breach the terms of the site in 2023 meaning that the site may be returned to its original standing, as per the resolutions available to the local authority.
- 3.8) During the period of time where it was responsible for project managing and delivering works associated with planning obligations to develop the Beddington Farmlands. It failed to meet these obligations to agreed timelines and has disposed of its responsibility to another limited company. It has shown that despite the ERF being granted on the proviso that planning obligations are met, they haven't been.

We therefore propose that if any increase is permitted that the following measures are adhered to:

- F. The operator sets up an alert model which any member of the public can subscribe to on their website which updates within 60 minutes any erroneous activity and within 24 hours states the cause of this. This system should automatically include local councillors, schools and constituted bodies.
- G. The site should be required to commit to more frequent dioxin, heavy metal and other emissions like PM 2.5 and PCBs monitoring and set up monitoring around the widest area that is capable of functioning in breach events given the routine nature of them at the site.
- H. Soil samples from a variety of locations up to 10km from the site should be taken before any increase over a 12-month period and then again routinely after to compare any changes in ground pollutants. Similar analysis should be done of water quality and at any farms or agriculture centres up to 20km away to monitor for any

pollutants entering the food chain and to what degree, correlated with the increased volume of waste managed at the site.

- I. Investment should be made into the monitoring systems to ensure that uptime is equivalent to 99.9999% and that per month there should be no period in excess of 120 minutes not monitored or the operator will be required to commit to further investment and revamp of its monitoring systems with a presentation made to the local authority on the cause of the failure or shut down the site, undertaking a full review of its monitoring system until uptime can be guaranteed.
- J. That the site be invested in to have suitable measures to handle the waste load including magnetic sorting, a specific waste sorting site and AI camera-conveyor belt systems commonly seen at other sites.
- K. That any increase to the permit is conditional on the fulfilment of the planning obligations tied to the site and not provided before this time.
- L. That any increase is conditional on the site being breach free for a 12-month period indicating that the current capacity is handled adequately.

4. Pollution on site not otherwise covered by the permit

- 4.1) The original site has now seen a significant increase in the volume of waste delivered and proportionally, the on-site plant movement. The operator has been forced to apply for larger onsite fuel stores to supply the plant activity but also the increased demands of the Incineration process. Despite this, the site has not invested in electric plant or on-site transportation and will therefore not be in alignment with the push towards net zero carbon.
- 4.2) With current performance as an indicator, the increase in waste volume will result in an increase in breaches and therefore downtime requiring larger amounts of fuel to restart the process causing excess pollution as demonstrated in recent applications for larger fuel stores.

We therefore propose that if any increase is permitted that the following measures are adhered to:

- M. The site operator be required to upgrade all onsite plant machinery to full electric to mitigate emissions.
- N. That the amount of diesel or furnace flame used at the site is regulated and the emissions from these vehicles be calculated and shared as part of monthly reporting.

5. No evidenced need

- 5.1) The Beddington ERF is no longer set to run off locally sourced waste with any future waste being imported. This increases transport emissions but also encourages a culture of incineration which sits at the bottom of the waste hierarchy.
- 5.2) Viridor proposes the need for the permit is to safeguard the efficiency of the ERF due to future calorific value of waste being sent to be incinerated. This is a wholly inaccurate supposition because the calorific value of waste currently and projected will not fall to levels where the ERF is operated 'inefficiently'. Viridor cannot provide evidence that there is a precedent or evidence that calorific value of waste has decreased or will decrease immediately or in the near future. They are not able to provide evidence of this claim or show how either recycling rates, removal or recyclables or sorting of waste onsite (not currently available anyway) will diminish calorific value. This is a pre-emptive permit to allow them to process more waste now, before any change to composition has even occurred.
- 5.3) Recycling rates in the South London Waste Partnership (SLWP) have decreased throughout the same period that the ERF has been in operation. There is no evidence that further incineration helps the SLWP meet its objective to increase recycling rates nor is capacity needed to meet any increases in waste generated in the SLWP.

We therefore propose that if any increase is permitted that the following measures are adhered to:

- O. That alternative methods of waste handling are employed by the operator at the site that do not include incineration to be in compliance with the waste hierarchy.
- P. That any future permits require the SLWP to hit recycling thresholds [to be agreed] and any waste taken into the site does not include recyclable material.

6. Combined Heat and Power

- 6.1) The site has been unable to make a CHP connection and the original business plan around this has been shown to be inadequate and inaccurate by CIPFA rendering this justification moot.

In summary the justification for this permit gives no security to measuring pollution. The operator has not got a proven track record for managing exceedances and does not reflect the current requirements, nor is proportionate to meet the needs of the South London Waste Partnership.