



**BEDDINGTON FARMLANDS – VALENCIA WASTE MANAGEMENT PROPOSALS
FURTHER REVISED PROPOSALS FOR LAND RESTORATION
Planning application reference - DM2024/00199
February 2025**

1. Wandle Valley Forum is a volunteer-run group that provides support and an independent voice for over 150 community groups, voluntary organisations and some local businesses and for everyone who shares a passion for the Wandle. These representations address both the original and revised planning variation submitted by Valencia Waste Management.

2. We object to these further revised proposals for securing the nature reserve and public access required on Beddington Farmlands. The revised proposals have not addressed any of the following key issues where we identified serious shortcomings in the original planning variation:

- Inadequate public access which falls below the requirements already agreed in the original plans and fails to take the opportunity provided by Local Plan Policy 5 to secure funding for a bridge over the railway line
- Inadequate consideration of transport and access to the site and the management of visitors
- A lack of safeguards for continuing the tradition of citizen science
- Inadequate delivery plans, including the need for a clear delivery and reporting framework, a refreshed and more robust Conservation and Access Management Committee and clear enforcement triggers
- Failure to consider the long term future of the site, including as part of the wider vision for Beddington Farmlands plus

3. The further revised proposals provide new evidence for the ecological benefit expected from delivery of the plans and for the approach to water management. This provides some areas of progress but remains inadequate because:

- the improved biodiversity net gain outcome is dependent on:
 - multiple changes in the technical assumptions used from the previous expert report suggesting a strongly precautionary approach should be taken to all the evidence provided in conflicting reports
 - delivery of habitats to the high standards specified when the applicant has a track record that has entirely failed to deliver the habitats required to even a baseline level

- creation of a new “Open Mosaic Habitat” that may bring ecological benefits but not ones that significantly contribute to the distinct ecological outcomes for Beddington Farmlands established in the Conservation Management Scheme
- the supply of water is not adequately climate-proofed and is dependent on inadequate safeguards against the use of polluted water being abstracted from the Main Effluent Carrier
- there is only a 30 year commitment to manage the site compared to the 60 year vision and need to secure the wildlife and public access benefits in perpetuity
- the financial guarantee held by Valencia Waste Management to ensure delivery is recognised as having a value lower than that required to deliver the nature reserve

4. In parallel with considering these amended proposals Sutton Council should also be pursuing vigorous enforcement action in relation to the multiple areas where it is now confirmed there is “*no significant change*” from the original proposals that have missed the deadline of end December 2023. This should draw down on the fund held by Valencia Waste Management to guarantee delivery where necessary

Background

5. The future of Beddington Farmlands is of the highest importance for the Wandle Valley. It offers an unprecedented opportunity to achieve transformational outcomes for people and wildlife both locally and strategically. The site has been identified as one of “Ten New Parks” being promoted across the capital by CPRE London and its significance goes much wider than the Wandle Valley. Beddington Farmlands also forms part of an even more significant opportunity – Beddington Farmlands plus - for transforming for public benefit the open space on both sides of the railway line that lies between and connects Beddington Park and Mitcham Common in the heart of the Wandle Valley. This has strategic significance at a London-scale. We are pleased to be able to contribute to realising this opportunity through our membership of the Conservation and Access Management Committee for Beddington Farmlands.

6. The failure to deliver the wildlife and public access commitments secured as part of planning consent for the major on-site incinerator has been wholly unacceptable. The shocking scale of the shortfall in habitat creation, decline in biodiversity and lack of public access is confirmed by the supporting evidence. It is a cause of widespread public distress. We initiated the first major online petition for delivering these commitments and contributed to the decision by Sutton Council to initiate the current enforcement action given the failure to meet the 2023 deadline for delivery of the new nature reserve. We agree with the view expressed by Sutton Council councillors at the Housing Economy and Business Committee on 26 November 2024 that “*Valencia have categorically failed us*”.

7. The further Revised Restoration Management Plan accompanying the latest amendments confirms that there has been “*no significant change*” in the proposals for many of the habitats (including neutral and modified grassland, wet grassland, woodland, islands and reed bed) which should have been implemented by the end of December 2023. Enforcement action should be vigorously pursued in these areas alongside consideration of these proposals for some changes to be made.

Consultation

8. We welcome the opportunity stemming from Valencia Waste Management assuming ownership of the site to secure the action needed to deliver on the planning obligations it has inherited for creating a new nature reserve and provide public access to and across the site.

9. The slow progress and poor communications since Valencia Waste Management took on responsibility has not been reassuring and the quality of community engagement prior to submitting this application has been wholly inadequate. It has run contrary to national planning policy that *“applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community”* (paragraph 137, NPPF). Instead the approach has been defensive and lacked transparency. These problems were exacerbated by the ludicrous decision to consult over the first variation during the Christmas break in 2023 and provide only limited information on the proposals. Even the more detailed information provided to the Conservation Access Management Committee was not made publicly available. It is unacceptable that the work by Stantec referenced in the initial consultation presentation was not made publicly available during the first consultation. Other failings include the detail of the slides provided online being of such low resolution that they could not be read and newspaper advertisements for the online presentation being published after the event. Members of the public also found they were unable to ask questions during the online consultation because of the way the meeting was handled.

10. It is disappointing that these shortcomings are barely acknowledged in the Statement of Community Involvement. This also confirms that despite detailed submissions from Hackbridge and Beddington Corner Neighbourhood Development Group, Beddington Farmlands Bird Group and Wandle Valley Forum there is no intention of providing more than very basic feedback on the issues raised prior to the first planning variation being submitted. We are simply asked to accept that Valencia Waste Management will give *“due consideration to the feedback ahead of submission of the application”*. This falls woefully short of what should be expected on such a significant proposal and all the evidence is that the *“due consideration”* has been scant.

11. The lack of respect for and failure to engage with local organisations and the local community is further evidenced by the approach to these further amendments. They wilfully only address comments provided by statutory bodies and the neighbouring landowner and no effort is made in the *“response to consultation covering letter”* to address other responses. There has been no additional consultation on the revised proposals and they were not even shared with the CAMC in advance of being submitted. The attitude of the applicant to effective consultation is further evidenced by the failure even to update its own consultation website to provide details of these amendments.

12. We believe the consultation approach offered to date entirely fails to *“demonstrate early, proactive and effective engagement”* and so should not *“be looked on more favourably”* (paragraph 137, NPPF).

Planning policy

13. We believe the proposals should be considered against the current policy and environmental context. This includes declarations of both a climate and biodiversity emergency in the period since consent for the incinerator was given. We do not consider the proposals to be “*minor modifications to the existing scheme*” as has been asserted. They are materially different in terms of the future habitats created and the impact on wildlife is significant. We disagree with the conclusion of Stantec’s screening report that there is evidence that the proposals do not have a significant effect on the environment when compared to the original plans. As a result we remain of the view that the revised proposals should be accompanied by a full Environmental Impact Assessment. Consideration of the application should be paused until this is available and the public consultation period then re-started.

14. We have considered the proposals in the context of the London Plan, Sutton Plan and Hackbridge and Beddington Corner neighbourhood plan which together provide the development plan for the area. Local Plan Policy 5 Wandle Valley Renewal states that:

“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.”

15. Local Plan Policy 26 Biodiversity states that:

“The council....will ensure the restoration of Beddington Farmlands is completed to the agreed quality.”

16. We believe the proposals fall short of these agreed restoration requirements and fail to provide the levels of public access and wildlife habitat Local Plan policies 5 and 26 require. The proposals offer more limited public access than the currently agreed plans and their wildlife benefit remains very uncertain. Planning policy is also clear that the proposals should be guided by the site specific requirements of the Conservation Management Scheme and not just more generic biodiversity net gain.

17. We object to the proposals and, in addition to the need for a full Environmental Impact Assessment, believe the following issues need to be convincingly addressed before the revised approach to land restoration can proceed:

Wildlife

18. The revised proposals need to deliver not only an independently validated increase in the biodiversity of the site of at least 10% but also an increase by comparison with the current plans. It is welcome that a new baseline and condition survey has been undertaken although we believe the baseline for addressing the site’s biodiversity net gain should be its condition prior to landfill operations, in accordance with the requirements of the Environment Act 2021, Schedule 7A Part 1. The use of a baseline which is set only after significant ecological harm has been caused is both flawed and disingenuous.

19. It is also welcome that the revised Biodiversity Net Gain report concludes there will be a net gain of 30.79% compared to the current restoration plans 20.72%

and the original planning variation's delivery of just 17.47%. This conclusion is dependent, however, on far reaching changes in the analysis and assumptions underpinning the report. The differences extend to both a complete revision in the baseline score that suggests Beddington Farmlands is much more ecologically valuable than had been previously been thought and basic questions of fact such as whether an area of land comprises "*developed land: sealed surface*" or "*open mosaic habitat*". We believe a highly precautionary approach should be taken to accepting either of these conflicting "expert" reports and to the claimed 43% improvement in the net gain score.

20. While there are improvements in the revised Biodiversity Net Gain report it also acknowledges significant shortcomings. By conducting surveys in September many important species will have been missed and there are examples of photos in the report that show a desiccated habitat because most plants weren't flowering. There could also have been closer working with the Beddington Farm Bird Group and Surrey Botanical Society who have a long history of botanical recording on site.

21. We also question the robustness of the assumptions in the new Biodiversity Net Gain report. The enhanced outcome is highly dependent on delivering assumed increases in the condition specified for key habitats. There is no evidence that Valencia Waste Management intends to deliver habitats to this condition and all the evidence to date of implementing conservation obligations on the site indicates there will be a major shortfall. It will be necessary to allow for this optimism bias in the Biodiversity Net Gain report when assessing compliance and to put in place measures that can provide high levels of confidence in the delivery of conservation targets and habitat conditions for the site.

22. Critically, the approach to securing wildlife benefit on Beddington Farmlands is now being driven by the framework of biodiversity net gain. This is inferior to the Conservation Management Scheme (CMS) target species framework and baselines that were set pre-landfill. The subjective nature of the biodiversity net gain framework is illustrated by the different conclusions of the two expert reports. While it is necessary in terms of the national policy framework for biodiversity net gain and it helps to support an approach to revisiting the plans for acid grassland it is not sufficient to meet the requirements of Beddington Farmlands. Among other shortcomings biodiversity net gain does not include birds, bats, butterflies and moths which are the main focus of the conservation effort on Beddington Farmlands. We believe the focus should continue to be on the target species which are set to a baseline before the landfill started. This can be supported by the indicator species surveys for each habitat which have been undertaken by conservation volunteers for years and provide a simple and effective way of measuring progress in the restoration.

23. The Biodiversity Net Gain report also confirms the project's significant reliance on the creation of a new Open Mosaic Habitat on Previously Developed Land to compensate for the weaker biodiversity benefit of the amended plans. While acknowledging the ecological value of this habitat and its value in raising the ambition for much of the grassland habitat we strongly question the merits of this approach. It will make only a limited contribution to achieving the expectations of the Conservation Management Scheme for target species which are distinct to Beddington Farmlands. Providing ecological gain unrelated to the specific needs of

Beddington Farmlands is an inadequate response to the biodiversity net gain shortfall.

24. We recognise the reasons for not progressing with the plans for acid grassland and heath. The alternative proposals are both less expensive to deliver and result in poorer biodiversity outcomes. It is essential therefore to not only enhance the plans to provide a net ecological gain over the original plans but also to mitigate the loss of acid grassland and heath. The available funds should be used to provide ecological benefits in south east corner and 100 acre which are key to delivering for the target species identified in the Conservation Management Scheme; to manage the main effluent carrier and Eastern Storage Pond so they are both more multifunctional and contribute to biodiversity net gain; to address the consequences of target species (including Yellow Wagtail, Tree Sparrow and Redshank) in decline or at extinction; and to improve management of and access by visitors to the site.

Water

25. The site regularly suffers from a chronic shortage of water. While the use of the “*main effluent carrier*” (MEC) and proposed “*storage basin*” (Eastern Storage Pond) can help to address this we are concerned that the approach carries high risks. It is dependent on the continued operation of Thames Water’s sewage works to generate the required volumes of sewage effluent. This needs to be guaranteed well beyond the 60 year vision. The revised Water Resources Report also fails to address the shortcomings in the original in respect of addressing the future impact of climate change on water needs. It states that “*Given future drier summers due to climate change, it is possible that Ph 3 will be prone to lower water depths during summer without additional pumped MEC flows. It is not, however, considered crucial to address this*” (paragraph 1.09). We fail to understand why this isn’t crucial given the long term nature of the proposals which are based on a 60 year Vision, the current experience of shortfalls, and the inevitability of climate stress which must now be addressed as a matter of national, regional and local planning policy

26. No effective solutions are provided to mitigate against this beyond management practices that reduce the ecological value of the grassland. This is evidenced by the statement in the revised Restoration Management Plan that “*During very extreme conditions of elongated periods of drought, it may be necessary to consider prioritising water management to areas which most need it*” (paragraph 4.64).

27. We welcome evidence of closer collaboration with Thames Water over use of the MEC as a source of water and agree that extraction from the Wandle or groundwater is not an option. It is also welcome that the fact of the MEC frequently carrying polluted water that is already causing problems downstream in the Wandle is accepted. While there is welcome recognition in the revised Restoration Management Plan that “*abstraction from the MEC should not occur during this time*” (paragraph 4.72) we have limited trust in the means to prevent it. Thames Water regularly denies responsibility for major pollution incidents arising from the MEC when reported by citizens to the Environment Agency. The intention to provide a remote ammonia monitoring system is welcome but this will neither address all sources of pollution nor automatically prevent polluted water being abstracted.

28. The future viability of the wet grassland is dependent on the success of the approach to water management. We believe there is a need for more convincing

proposals and a clearer plan for managing the water balance needed across the site. This is likely to require involvement of Thames Water and changes in the management of the adjacent land in addition to use of the MEC. The water from the MEC needs also to be used to secure wildlife outcomes in south east corner and 100 acre consistent with the CMS. These measures all need to be secured via a s106 obligation with heads of terms agreed prior to determination. There should be no negative impact on the Wandle from reduced flows or any direct abstraction from the river or groundwater to realise the approach. We seek clearer evidence that confirms this and ask that it be the subject of a planning condition.

29. It is also important that both the MEC and Eastern Storage Pond are multifunctional, supporting wildlife alongside their engineering role in managing water across the site. We also believe the MEC could be adapted to be more multifunctional and this would enable it to be included in the biodiversity net gain calculations.

Public access

30. We are profoundly disappointed by the lack of ambition for providing public access to and through the site. No changes have been made to the original planning variation. Public access agreed a decade ago has still not been provided and the plans envisage further long delays. The plans remain inadequate and the level of access to be provided is too limited. The proposals are weaker on the key east/west route and improvements to the existing north/south permissive path than the existing planning agreement. This should provide a baseline. Specifically, the proposals fail to provide the key Mile Road east/west route in the current planning agreement. This option provides direct access to Hackbridge over the last remaining bridge across the railway and is a major omission. The east/west route which is proposed is welcome but far less convenient in providing access to Hackbridge. Unlike Mile Road it also raises concerns over clashes at its eastern end between pedestrians and cyclists and the heavy goods vehicles servicing the Beddington incinerator off Beddington Lane. We can see no adequate mitigation for this in the Transport Addendum.

31. We are also concerned that “*seasonal*” access could be highly restrictive and seek 24/7/365 access to the proposed east/west route(s) given its role in providing an active travel link between Beddington Lane and Hackbridge. It will rapidly become an indispensable link in the local transport infrastructure. The proposed opening hours to the main area of the site are much too restrictive and the suggestion of a 2.30pm closure is ludicrous. As a minimum access should be from dawn till dusk during the winter months and include summer evenings. There should also be greater access in the spring and early summer to the Northern Lake.

32. The Transport Addendum demonstrates how little attention has been paid to public access to and through the site. Instead of anticipating the future use of Beddington Farmlands as a popular, publicly accessible nature reserve, visitors are only being considered as an afterthought. The scheme has retrofitted minimal cycle parking provision, failed to provide a minimum of car parking and failed to integrate with the wider investment in cycling infrastructure in the area, including Beddington North. It appears no consideration has been given to access from Hackbridge station which provides the most appropriate entry point for visitors to the area.

33. We commend the community-led plans for access developed by Hackbridge and Beddington Corner Neighbourhood Development Group and Beddington North Neighbourhood Forum with support from Wandle Valley Forum. These provide a proportionate approach. As part of the development plan the Hackbridge and Beddington Corner neighbourhood plan Policy EP1 states that “*all development proposals shall be required to contribute to the provision of easy access to green spaces where justified, including.....retention, development and provision of public access to Beddington Farmlands.*” The community plans also include reinstating the bridge over the railway in accordance with Local Plan Policy 5 that “*the council will.....support the Wandle Valley Forum to lead on securing external funding for a replacement pedestrian bridge*”. Valencia Waste Management’s revised proposal for the restoration of Beddington Farmlands is the obvious opportunity to secure the external funding required. We stand ready to work with Sutton Council and Valencia Waste Management to achieve this.

34. The boundary treatment to all the footpaths should be sensitive to the open landscape and every opportunity should be taken to avoid fencing. Hedgerows can play an important role but there also need to be views across the landscape. The width of routes should be more generous and not hem visitors into narrow corridors. The east/west route(s) should be conditioned so that it will not be lit and is designed to manage conflicts between pedestrians and cyclists, including use of a noise-generating surface to provide an aural warning of cyclists for pedestrians. The east/west route(s) and the route along the current north/south permissive path should be dedicated as public rights of way, have pedestrian priority, and be opened within the first year of the programme. They should not be “permissive routes”. All of these measures are necessary to meet the expectations of Sutton’s Local Plan for improved access as part of the renewal of the Wandle Valley.

35. We believe there should be immediate public access to both the southern lake path and the northern lake path with appropriate screening, such as mature hedgerows. We acknowledge the primary importance of managing Beddington Farmlands for wildlife and believe this can be achieved without major conflicts over public access. It is important that further public access is provided in parallel with the evolution of the habitats and is not delayed until they reach maturity. Conflicts can be managed and access to the site as it evolves is critical to ensuring public understanding of the site and its wildlife value. This will have long term benefits in managing public attitudes to the site which respect its wildlife.

Visitor management

36. The Local Plan’s ambitions for Wandle Valley renewal require that the proposals do more to provide a focus for visitors where they can be introduced to the site. This might initially be based around the proposed shelter/shed and this could be developed as a welcoming point providing basic facilities and a place to gather. Its current identification as a “Visitor and Agricultural Shed” is a misnomer as there are no visitor facilities, such as toilets. The shelter/shed needs to become public facing. Appropriate provision for visitor parking will also be needed in both the short and long term and this necessary land take should be addressed as part of wider plans for the area. Effective arrangements also require direct access from Hackbridge station, improvements to the route over Mile Road Bridge, a new footbridge (which also links to the school) and facilities for hosting education and learning visits. An effective public facing ranger service should be provided in addition to a site manager. We are supportive of local proposals for visitor

arrangements to be based on access from Hackbridge, with the significant advantage of the railway station. Direct access from the station as proposed should be a requirement of any planning consent and delivered in the first year. The current plans should demonstrate that they are consistent with these future arrangements.

37. The intention to provide further hides is welcome. There is limited detail on their design which needs to be a substantial improvement on those which have been installed. They should appeal to the public of all ages, heights and levels of mobility and include appropriate interpretation. They should discourage anti-social behaviour. The existing hides should be replaced with an improved design as well as new hides installed. Further clarity on public access routes to all the hides is needed.

Citizen science

38. Beddington Farmlands has the privilege of an ecological record compiled by dedicated volunteers over decades. The volunteer ornithological record goes back more than a century. This record is a remarkable resource that has been poorly handled in recent years. The future management of the site should embrace and celebrate the citizen scientists who record its health by providing substantial support over access, facilities, meetings and communications. This should be an integral part of the monitoring arrangements, including providing financial and other support. All data should be regularly reported to Greenspace Information for Greater London (GIGL) as London's environmental record centre. This should be addressed through planning conditions securing the value of the site as an ecological record and appropriate s106 obligations.

Beddington Farmlands plus

39. The site forms part of a much wider network of open space between Beddington Park and Mitcham Common constituting the largest environmental opportunity for wildlife and increased public access to nature in London. The proposals should be future proofed to form part of a coherent whole and this should be embraced by the Vision. The approach should include more access routes from Beddington Park and active travel routes from the north end of the permissive path to Carshalton Road and Beddington Lane tram stop. This can be achieved without harm to Mitcham Common. There should be circular routes across the land west of the railway and new access from Hackbridge Primary School on London Road, including across a replacement bridge over the railway.

Future management

40. The restoration plans need to be accompanied by a clear vision and route map to how it will be managed for the long term as a major wildlife site with significant public access and learning opportunities. This is not provided by the relatively narrowly conceived "*60 year vision*" and is fundamentally undermined by the intention to provide management resources for only 30 years. It is essential to establish the route map at this stage to ensure the sustainability of the proposals, especially given the poor record of delivery. We envisage a major conservation organisation or independent trust taking long term responsibility, consequent on receiving a significant endowment. This should embrace all the land between Mitcham Common and Beddington Park, including land west of the railway and adjacent sites along Beddington Lane, including those released or managed by Thames Water. There should be a phased plan for the integration of these sites into the wider ambition for "Beddington Farmlands plus", including its contribution to the

local nature recovery strategy in London. There should be public facing rangers to maximise public benefit from increased access and enhanced biodiversity from the beginning of the plan.

41. This approach should draw on the collaboration opportunities that already exist in the area with Valencia taking a much more pro-active approach. Beddington Farm Bird Group is a major community asset that can undertake monitoring and support improved public engagement. Previous collaborations with local groups and organisations, including Bioregional and Hackbridge and Beddington Corner Neighbourhood Development Group has brought in hundreds of thousands of pounds creating the pocket park and the Mile Road entrance, erecting village signs, undertaking wildlife corridor planting, and producing pre-feasibility studies for a visitors centre and community solar farm. There is interest from significant nature conservation ngos and multiple and growing green finance opportunities available.

Delivery

42. The presentation of the plans and the accompanying timetable for their implementation is disappointingly familiar. The opportunity to strengthen the approach has not been taken in the revised plans. It mirrors Viridor's approach which has entirely failed to deliver. The lack of accountability for delivery has continued into Valencia Waste Management's ownership even in the year since the first planning variation was submitted. The fact of the site having missed the final delivery date for the nature reserve of 31 December 2023 and active consideration of enforcement action confirms the need for much more robust delivery requirements that provide a much more certain delivery path. Planning conditions should establish tightly managed milestones and impose significant financial penalties for any delays in delivery. Quarterly updates should be required to be made publicly available, including details on the bond/financial reserve, and these should be independently assessed against the delivery timetable. The planning conditions should recognise that enforcement action may be taken to secure delivery well before the deadlines and end dates.

43. The approach should be supported by a refreshed Conservation and Access Management Committee with an independent secretariat and the resources needed to hold Valencia Waste Management to account. The benefits from the arrival of the warden employed by Sutton Council are manifest and this capability should be expanded as part of the delivery plans. It should include a stronger public facing role and improved communications. It is also essential that the enforcement action currently underway to secure delivery of the original planning consent is continued. This is a key mechanism to secure delivery of the combined ambitions for Beddington Farmlands in both the original and revised proposals.

44. It is helpful to have a summary "*High Level Budget For Delivery Of Revised Restoration Management Plan*" which indicates a requirement for £2.354m (including contingency) to deliver the proposals. This compares to just £2.185m held by Valencia Waste Management as a cash deposit in escrow (as an alternative to the bond required by the original s106 agreement). The Budget includes provision for £0.751m maintenance and aftercare costs and £0.17m consultancy costs. There is no evident provision for inflation. It would be helpful to have further clarity as to whether it covers the full costs of delivery and aftercare including those elements which are not the subject of the planning variation. We can see no provision for visitor management and rangers.

45. The security provided by the original restoration bond is critical to confidence in the delivery of the proposals. We can see no reason why Sutton Council has not already exercised its rights to access the funds to deliver time critical work that protects critical species now at risk of extinction, including the lapwing. This cannot wait for the process of the planning variation to play out.

46. In the longer term the approach needs to:

- Independently validate the Budget to confirm the robustness of the costs, including for long term maintenance & aftercare and visitor management and a ranger service
- Increase the level of funding held as a cash deposit in escrow to match the Budget (currently a c£0.2m shortfall)
- Make provision to index link the funding held as a cash deposit in escrow to ensure it acts as an effective delivery guarantor into the future
- Make provision for maintenance and aftercare well beyond the 30 year monitoring period and for visitor management and a ranger service

47. We look forward to working with Valencia Waste Management and Sutton Council in the development of improved plans for this remarkable site and for realising the unprecedented opportunities it offers.