



**BEDDINGTON FARMLANDS – VALENCIA WASTE MANAGEMENT PROPOSALS
REVISED PROPOSALS FOR LAND RESTORATION
Planning application reference - DM2024/00199
March 2024**

1. Wandle Valley Forum is a volunteer-run group that provides support and an independent voice for over 140 community groups, voluntary organisations and some local businesses and for everyone who shares a passion for the Wandle.
2. 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 the open space on both sides of the railway line between and connecting with Beddington Park and Mitcham Common in the heart of the Wandle Valley for public benefit. 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.
3. 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. This enforcement action should continue to be vigorously pursued alongside consideration of these proposals.
4. 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.
5. 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

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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 Christmas break and provide only limited information on the proposals. Even the more detailed information provided to the Conservation Access Management Committee has not been made publicly available. It is unacceptable that the work by Stantec referenced in the initial consultation presentation was not made publicly available during the 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.

6. 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. 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. 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).

7. We believe the revised 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 believe 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.

8. 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.”

9. Local Plan Policy 26 Biodiversity states that:

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

10. 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 are weaker on both counts than the currently agreed plans.

11. We are concerned that Three Corner Field has been excluded from the proposals despite its previous inclusion in the early public consultation. The successful restoration depends on an integrated management approach and this will not be delivered through an inadequate financial bond being available for this site.

12. 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

13. 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. We dispute the biodiversity net gain evidence that has been submitted, including for the choice of baseline. 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.

14. Notwithstanding the selection of the wrong baseline the Biodiversity Net Gain report concludes in paragraph 1.1.6 that the current restoration plans would deliver a biodiversity net gain of 20.72% and the revised restoration plans which are the subject of this planning application would deliver a biodiversity net gain of just 17.47%. We do not believe this reduction is compensated for by additional hedgerows. Claims that the original plans were based on unsustainable habitat creation are not relevant to the need for the revised proposals to avoid reducing biodiversity benefits. It is wholly unacceptable that the proposals will not deliver even the same biodiversity benefits as the original plans.

15. We believe a minimum 10% Biodiversity Net Gain uplift on the original plans for the nature reserve should be expected. This is reasonable considering the changed context since the original application. The restoration to provide wet grassland is less expensive than acid grassland and heath creation which provides funds that can address the consequences of target species (including Yellow Wagtail, Tree Sparrow and Redshank) becoming extinct on the site, overall biodiversity dropping and climate and nature emergencies being declared. Instead the Biodiversity Net Gain calculations show revised plans deliver a 16% reduction for habitats compared to that required in the current plans.

16. 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 offsite net gain in south east corner and 100 acre, to manage the MEC so it is more multifunctional and contributes to Biodiversity Net Gain and to improve management of and access to the site.

Water

17. The site regularly suffers from a chronic shortage of water. While the use of the “*main effluent carrier*” (MEC) and proposed “*storage basin*” 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. It also needs to address evidence in the Water Resources Report (paragraphs 7.1.2-7.1.7) that the demand for water in summer months when there are already regular shortfalls is likely to increase substantially within the period of the 60 year vision as a result of climate change. 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 Habitat Management Plan that “*during extreme conditions of elongated periods of drought, consideration should be given to sustaining smaller areas of wet grassland habitat*” (paragraph 4.7.17). The Water Resources Report shows that such “*extreme conditions*” will become increasing normal as a result of climate change.

18. The MEC is also frequently carrying polluted water that is already causing problems downstream in the Wandle. While there is welcome recognition in the Habitat Management Report that “*abstraction from the MEC should not occur during this time*” 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.

19. 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. These need to be secured via a s106 obligation prior to determination. There should be no negative impact on the Wandle from reduced flows or any direct abstraction from the river to realise the approach. We seek clearer evidence that confirms this and ask that it be the subject of a planning condition. The storage basin should also be multifunctional, supporting wildlife alongside its engineering role in managing water across the site. We also believe the MEC could be adapted to be more multifunctional and note it is excluded from the biodiversity net gain considerations.

Public access

20. We are profoundly disappointed by the lack of ambition for providing public access to and through the site. Public access agreed a decade ago has still not been provided and the plans envisage further long delays. The plans are also 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. 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 plans.

21. 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.

22. 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.

23. 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.

24. We believe there should be immediate public access to both 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

25. The Local Plan's ambitions for Wandle Valley renewal require that the proposals should 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. 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.

26. 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.

Citizen science

27. 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

28. 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

29. 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”. 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.

Delivery

30. The presentation of the plans and the accompanying timetable for their implementation is disappointingly familiar. 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. The fact of the site having missed the final delivery date for the nature reserve of 31 December 2023 and being the focus of welcome 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, 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.

31. The approach should be supported by a refreshed Conservation 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.

32. 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.