



BEDDINGTON FARMLANDS – VALENCIA WASTE MANAGEMENT PROPOSALS January 2024

1. Wandle Valley Forum 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. It 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 for transforming the open space between Beddington Park and Mitcham Common on both sides of the railway line in the heart of the Wandle Valley for public benefit. 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 campaign for Beddington Farmlands is a major priority for Wandle Valley Forum. 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. 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.
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 providing public access to and across the site. The slow progress and poor communications since Valencia Waste Management took on responsibility has not been reassuring. It has been defensive and lacked transparency. These problems are now exacerbated by the ludicrous decision to offer a minimal consultation period 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. The work by Stantec referenced in the consultation presentation has not been made publicly available as part of this consultation. Other failing include the detail of the slides provided online being of such low resolution that it cannot 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

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the way the meeting was handled. 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). It would be unacceptable for the next stage to be submission of a planning application as proposed. Effective community engagement prior to submission of a planning applications is needed which meets the standards for effective engagement in national planning policy as a minimum.

5. 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*”. 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.

6. We believe the following issues need to be addressed alongside more effective community engagement before a planning application is considered:

Wildlife - The revised proposals should provide an independently validated increase in the biodiversity of the site – given the changed context we believe a minimum 10% Biodiversity Net Gain on the original plans for the nature reserve should be expected. There is no evidence currently provided that the proposals will deliver even the same biodiversity benefits as the original plans.

Vision – The proposals need to support delivery of a coherent Vision. As presented there are two different visions provided. The Vision in the consultation website is substantially different to that provided in the consultation presentation and neither is well written nor addresses the full potential of the site. The Vision should address the important strategic connections to the opportunity of the entire area of open space between Beddington Park and Mitcham Common on both side of the railway within the Wandle Valley.

Water – The site regularly suffers from a chronic shortage of water. While the proposed “*holding pool*” can help to address this it provides only a partial solution. We remain concerned about the viability of the northern wet grassland without a more convincing approach and a clear plan for managing the water balance is needed across the site. This is likely to require involvement of Thames Water and changes in the management of its adjacent land. There should be no negative impact on the Wandle from abstraction needed to realise the approach. The holding pool should be multifunctional, supporting wildlife alongside its engineering role in managing water across the site

Public access – We are disappointed by the lack of ambition for providing public access to and through the site. This falls well short of the community-led plans developed by Hackbridge and Beddington Corner Neighbourhood Development Group and Beddington North Neighbourhood Forum with support from Wandle Valley Forum. It is also weaker on the east/west route and improvements to the existing north/south permissive path than required under the existing planning agreement. The proposals fail to provide the key Mile Road east/west route in the

current planning agreement. This 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. We are concerned that “*seasonal*” access could be highly restrictive and seek 24/7/365 access to the proposed east/west route(s) given the role in providing an active travel link between Beddington Lane and Hackbridge. The boundary treatment to all the footpaths should be sensitive to the open landscape and opportunities sought which do not involve fencing. The width of routes should be generous and not hem visitors into narrow corridors. The east/west route(s) should not be lit and should be 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. 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.

Access v Wildlife – 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 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 – The proposals should make further provision for securing public access and providing a focus for visitors where they can be introduced to the site. This might initially be based around the proposed equipment shed which could be developed as a welcoming point providing shelter and basic facilities. Appropriate provision for visitor parking will also be needed in both the short and long term and the necessary land take should be addressed as part of wider plans for the area. Effective arrangements require direct access from Hackbridge station, improvements to the route over Mile Road Bridge and facilities for hosting education and learning visits. A key decision is whether future visitor arrangements will be based on access from Hackbridge to the west or Beddington Lane to the east and the plans should be future-proofed. We are supportive of local proposals for visitor arrangements to be based on access from Hackbridge, with the significant advantage of the railway station. The future arrangements should include restoration of lost crossings over the railway.

Citizen Science – Beddington Farmlands has the privilege of an ecological record compiled by dedicated volunteers over decades. It 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, offering substantial support over access, facilities, meetings and communications. All data should be regularly reported to Greenspace Information for Greater London (GIGL) as London’s environmental record centre.

Beddington Farmlands plus – 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 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.

Future management – The plans should 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. We envisage a major conservation organisation or independent trust taking 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.

Delivery – The presentation of the plans and the accompanying timetable for implementation is all too 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 proposals still being in initial consultation after the final delivery date for the nature reserve of 31 December 2023, in the midst of enforcement action and with a stretched timeline for future delivery further undermines trust in the process. Given this recent history and the outstanding Ombudsman report into the failure to enforce delivery it is essential that revised proposals are secured through a much more certain delivery path. This should include tightly managed milestones and significant financial penalties for any delays in delivery. Quarterly updates should be made publicly available, including details on the bond, and these should be independently assessed against the delivery timetable. 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.

7. 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.