



BEDDINGTON FARMLANDS – DELIVERING CONSERVATION AND PUBLIC ACCESS
A Wandle Valley Forum note for Sutton Council’s Housing, Economy & Business
Committee
September 2021

1. Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle.
2. We welcome the continuing focus of Sutton Council on ensuring delivery of the planning commitments for Viridor to provide conservation benefits and public access at Beddington Farmlands, including the intention to review the issue every six months with updates from Viridor. We have also welcomed the opportunity to join the Conservation and Access Management Committee (CAMC) as an observer and to tour the site and receive an update on progress. We welcome the progress that has been made.
3. The context remains important. There have been important steps forward but Viridor’s progress continues to be too slow and is well behind schedule. It is failing to meet even its own commitments. There is still virtually no public access to the site and the results of the Beddington Farmlands Bird and Wildlife Report 2020 “*show an overall declining situation*”. There is intense public interest in its future as evidenced by well supported petitions (e.g. Save the Lapwings, >66,000) and the significant increase in the numbers using the “permissive path” and wildlife hides. Beddington Farmlands has been highlighted as one of ten potential new parks for London by CPRE London.
4. Wandle Valley Forum does not agree with the view that enforcement action cannot be taken prior to December 2023. We are unclear as to where this date is stated in the planning permission for the Energy Recovery Facility (D2012/66220). We consider that the conditions and accompanying agreement and restoration scheme to permission D2012/66220 set out a phased scheme of restoration to synchronise with the development stages of the ERF itself. This has not been achieved.
5. In any case, if December 2023 is considered to be the completion date for delivery of the conservation outcomes for Beddington Farmlands within the relevant permission, we believe earlier action can be taken where it is reasonable to conclude that planning conditions will not be delivered by this date and no credible contrary evidence is provided.
6. We are seeking clarification from Sutton Council as to which planning permission it believes has been implemented at the site and governs the scheme of restoration via the conditions and corresponding s106 agreement. This is a source of confusion given conflicting correspondence stating the relevant planning permission is D2012/66220 for an Energy Recovery Facility and also permission D2005/54794 for an Anaerobic Digestion

Facility, along with the later s73 permission D2015/72898. The Committee's support on this would be welcome.

7. The officers' report for the Committee confirms the continuing problems with ensuring Viridor meets its obligations to Beddington Farmlands. Viridor has not provided the "*clear itemised project plan, including available resources, that demonstrates, with clear milestones, how each phase of the remaining work will be completed by 31 December 2023*". Instead we have an update that is already three months old and contains just a Roadmap infographic and a basic Gantt chart. While helpful for public communications this is no substitute for the clear, itemised project plan requested. It exacerbates public concern that Viridor will not deliver on its planning condition commitments if it is unable to provide a clear and sufficiently detailed plan for doing so.

8. The officers' report continues to show serial delays in meeting targets, preparing permits and applying for consents. Not one of Viridor's stated commitments has been fully completed. There is also evidence of a failure to provide appropriate management and aftercare, including new trees dying, twice, along the permissive path.

9. We ask the Committee to seek more timely and effective reports on the progress being made and to require evidence that Viridor's commitments can be met. Where this evidence is not provided then we believe enforcement action can be taken where there can be no reasonable expectation that the relevant planning conditions will be met. On the basis of Viridor's current track record we believe this already to be the case.

10. We have supported efforts to raise the bar on public access to and through the site and await the revised and much delayed planning application for new paths. It will be important that this:

- Is informed by effective pre-application discussions with the community
- Proposes material chosen because it is appropriate to the site and not just because it is already available on site
- Is able to provide full access in all weathers, including to the mobility impaired
- Is accompanied by an independent Equalities Impact Assessment and evidence of effective access to different groups
- Provides guarantees on the quality of access with minimum restrictions and clear commitments to dedicating rights of way – we recognise the benefits of a short period (months not years) of managed access to allow learning for future maintenance and management approaches
- Supports plans for full East/West access between London Road and Beddington Lane, new access points to Beddington Park, and links to improved access across the land between BedZed and Mitcham Common west of the railway line by Hackbridge Primary School

11. Beddington Farmlands has benefitted from an immense citizen science effort providing a sound ecological record that has been validated and used by all relevant organisations. This is now at risk as key volunteers are no longer available and it is important that the record is maintained and published, not least to accurately monitor net biodiversity gain/loss and to cross reference against the records produced by Viridor's ecological consultants.