CIIr Barry Lewis

London Borough of Sutton
Chair of the Environment and Sustainable Transport Committee



Sir James Bevan Chief Executive Environment Agency Horizon House Deanery Road Bristol BS1 5AH Leadership Office London Borough of Sutton Civic Offices, St Nicholas Way, Sutton SM1 1EA Tel: 020 8770 5000

Sent by email to james.bevan@environment-agency.gov.uk

14 December 2022

Dear Sir James,

I write with regard to the permit variation submitted by Viridor South London Limited to the Environment Agency on 23 December 2021.

This application seeks to vary Viridor's operations permit EPR/GP3305LN/V003 at the Beddington Lane Energy Recovery Facility 105, Beddington Lane, Croydon, CR0 4TD (ERF) and increase the maximum amount of waste that can be processed at the site from 347,000 tonnes per annum (tpa) to 382,000 tpa.

In accordance with the public consultation process and with reference to the Environment Agency's criteria for consultation, the London Borough of Sutton **strongly opposes** this permit on the grounds set out in our response (attached) for the following reasons:

- This permit increase, together with the one previously approved, would mean the facility processing 26% more waste than it was originally designed for.
- The facility has not been designed to handle the volume of waste Viridor wishes to
 process under this increase. It already operates at times at maximum capacity. The
 facility has also experienced six emissions breaches since May 2022. Whilst
 momentary, it demonstrates Viridor is not able to consistently meet the emissions
 limits and if the permit is approved, there may be an increase in breaches.
- The impact upon the local area and environment that any increase in tonnage could lead to.
- The borough is seeing a fall in the amount of residual waste processed. The Council strongly supports waste minimisation and does not believe the permit increase at the facility is required locally or regionally as residual waste tonnes are falling.

On behalf of the Council, I strongly urge the Environment Agency to refuse the permit variation application.

Yours sincerely,

Councillor Barry Lewis

Chair of the Environment and Sustainable Transport Committee

Encl.