

Consultation Questions:

1. Please tell us if you are responding as an individual or on behalf of an organisation or group.

- Individual
- **On behalf of an organisation or group**
- Other (please specify below)
- Name of Individual, Organisation or Group

Other:

2. What is your email address?

If you provide your email address below you will automatically receive an acknowledgement email when you submit your response.

Also, by providing us with your email address you consent for us to keep you updated about the consultation. We will only keep your details until we've notified you of this. We will not share your details with any other third party without your explicit consent unless required to by law. You can withdraw your consent to receive these emails at any time by contacting us at psc@environment-agency.gov.uk

- What is your email address?

3. Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

(Required)

- **Yes**
- No
- If you do not want us to publish your response, you need to tell us why.

4. Please provide your comments on the environmental permit application received from Viridor South London Limited

[\[please see below\]](#)

5. If you have any documents or images to attach to your response, please upload them below

[N/A](#)

6. Please tell us how you found out about this consultation:

- Environment Agency briefing note
- **Through an organisation you're a member of**
- Local Newspaper
- Social media e.g. Facebook, Twitter
- Through a meeting you attended
- Word of mouth
- Other

If other, please specify.

Consultation Response:

In response to an application made by Viridor South London Limited to vary environmental permit EPR/GP3305LN/V003.

Sutton has reviewed Viridor's permit variation application carefully and has reached the view that we **strongly object** to the request made by Viridor to increase the maximum capacity of the Beddington Energy Recovery Facility for the reasons stated below.

If granted by the EA, this permit variation means that the ERF's waste processing capacity is increased by approximately 26% over the 302,500 tonnes per annum (tpa) that was originally permitted in July 2013. This is a material increase going far beyond what was originally agreed and planned for, which impacts the borough and its residents.

Whilst this consultation provides a platform to respond to the proposed permit variation, the selective criteria set by the EA make it extremely difficult to effectively set out the concerns we have and the reasons for opposing this. Many valid points of opposition being raised by concerned parties will be immediately struck out without consideration on the basis they do not fall within these criteria. Sutton maintains that there are relevant matters falling outside the criteria requiring the EA's attention and consideration. Sutton urges the EA to take these matters into account before it awards permission to the permit application as a matter of public interest.

Sufficient waste treatment capacity

The London Mayor's analysis of future waste treatment capacity requirements in London suggests that "if London achieves the Mayor's reduction and recycling targets, it will have sufficient Energy from Waste capacity to manage London's non-recyclable municipal waste" (The London Plan, March 2021). This modelling predates the approval of the very significant second energy from waste facility at Belvedere (with a capacity of 655,000 tpa). In addition Viridor themselves have just acquired the rights to develop the Thameside ERF at Tilbury (with a capacity of 350,000 tpa) and an ERF is currently under construction at Rivenhall in Essex (with a capacity of 595,000 tpa). So regionally, an additional 1.6m tpa of treatment capacity is going to come on stream in the near future.

Notwithstanding the increases in municipal waste tonnages as a result of the COVID-19 pandemic which we are starting to see fall again, Sutton and its partner boroughs have seen a downward trend in residual waste tonnages in recent years and are among the top performing boroughs for recycling rates in London, avoiding the need of sending waste to the ERF. There is already surplus capacity under the existing permit at the ERF. Sutton maintains that the existing permit is more than sufficient to treat the levels of waste coming in and a further permit increase is not required.

Legitimate questions therefore exist as to whether additional energy from waste capacity is required at Beddington.

Emissions

The facility is not consistently operating within the emissions limits of its existing permit, with 39 exceedances recorded in 44 months since the ERF became fully operational. Increasing waste volumes is likely to compound the problem and result in further exceedances. The EA should not grant permission for Viridor to process more waste at the site because the operator has not proved that the facility can consistently operate within its current permitted emissions limits.

In Viridor's application it is proposed to increase the waste throughput (capacity) of the ERF to allow for operation at the 110% Maximum Continuous Rating (MCR), as detailed in the document "Beddington Firing Diagram" submitted as part of the application. Viridor has detailed how this will be achieved in the application and these changes are proposing an increase in the hourly processing capacity of the ERF. It should be considered whether this will improve or deteriorate performance of the ERF and whether there is sufficient capacity on site for this increase in waste and vehicle movements.

With reference to the EA criteria to oppose the permit variation application, Sutton has concerns over whether the correct process is being used to detect waste types that can significantly impact the permitted emission levels. Recent exceedances have been caused by nitrous oxide gas bottles. It is imperative that appropriate technology is incorporated at the ERF to ensure that materials are intercepted to avoid exceedances. Viridor, Sutton and its partner boroughs are working together to educate residents to divert as much of this material away from the ERF as possible. We are concerned that the permit extension will allow the acceptance of more third party waste that is beyond our control to influence, and that with an absence of adequate technology to mitigate the issue, emission breaches will continue and increase.

Operational deliverability

The bunker was not designed to receive 382,286 tonnes of waste and there are already times during the year when the ERF waste receipt areas operate at maximum capacity. There are also times when the waste bunker is full and Viridor is required to use the controlled overspill area in the tipping hall. Sutton opposes the further 10% increase, on the basis that the site is already operating over capacity. Further pressure on the ERF is likely to result in more breaches and exceedances.

Any additional pressure on the ERF's waste receipt areas also has the potential to have knock-on effects for our waste collection crews, which make direct-deliveries of residual waste to the facility. Any disruption or temporary cessation of the receipt of waste at the ERF due to overcapacity issues could in turn disrupt local waste collection services, with potentially serious consequences. We also have concerns about the ability of the local road network to cope with the additional traffic movements. Whilst we note that the EA does not consider the wider issue of increased vehicle movements as a reason for objection, but the council is nonetheless concerned about the impact that an increased amount of waste being received at the site will have on local air quality and increased congestion, with the potential impact on our ability to carry out timely and efficient waste collection operations.

We note that the EA criteria will only consider the noise and odour implications from traffic associated with operations on site. However, this permit application to increase waste processing will result in an increase in vehicles on site and this must be taken into account.

The London Borough of Sutton remains certain that the ERF is an environmentally sustainable, cost-effective and safe way of treating household residual waste under the existing permit. The ERF has delivered significant benefits to the borough in terms of carbon reduction and savings. However, approving this permit variation would see the facility expand significantly in excess of its original scale and purpose to serve local residents.

We have set out our reasons above for objecting to this permit variation application and we call on the Environment Agency to refuse it.

END