

Mr Andy Cook
London Borough of Sutton
Development Control, Environment & Leisure
24 Denmark Road
Carshalton
Surrey
SM5 2JG

Our ref: SL/2012/110215/01-L02
Your ref: D2012/66220
Date: 09 November 2012

Dear Mr Cook

Phased demolition of existing buildings and development of an energy recovery facility, buildings ancillary to the energy recovery facility, construction of two CHP pipelines, revisions to the approved restoration plan for the Beddington landfill site, amendments to the existing in-vessel composting operations, removal of the existing access and provision of new access and reconfiguration of access to Thames Water site to north.

Beddington Farmlands Waste Management Facility, Beddington Lane, Beddington CR0 4TD

Further to our letter dated 19 October 2012 which was our preliminary response to your consultation on the above proposal, we are writing to update our comments. This follows the conclusion of our audit of Viridor's *Air Quality and Human Health Risk Assessment*, Beddington Lane ERF, Final Report, RWDI#1200304, July 2012, submitted as part of their Environmental Permit application.

We do not agree with Viridor's choice of a background level for NO₂ of 30 µg m⁻³, derived from diffusion tube monitoring at numerous locations across the boroughs of Sutton and Croydon. It is our view that local background conditions are more likely to be represented by continuous emissions monitoring at Beddington Lane N site (SA5) than those presented by the applicant. We consider there is unlikely to be any headroom for annual mean NO₂ concentrations in the vicinity of the Brookmead Road and Beddington Lane Junction.

The air quality assessment shows that the process contribution from the installation is unlikely to be insignificant. When determining this planning application you will therefore need to consider whether the proposal is likely to result in, or contribute to, a breach of the EU Environmental Quality Standards (EQS) for NO_x within an Air Quality Management Area.

We are currently not satisfied that emissions from the stack at the proposed limit of 200 mg/m³ from a stack height of 85m would ensure a sufficiently high level of protection for human health and the environment.

We have asked Viridor to review both their NO_x abatement proposals and proposed stack height to reduce the contribution of NO₂ from the Incineration process.

We have forwarded you a copy of our audit report with this letter.

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Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk



We hope you find our comments helpful. Please contact me if you have any questions.

Yours sincerely


Planning Liaison Officer

