



Future Merton
Merton Civic Centre
London Road
Morden
SM4 5DX

recycling and recovery UK

Ref: 0001.SUEZ.KF.MLPS2

4 January 2019

Dear Sir or Madam,

**Merton Local Plan 2020
Stage 2 Consultation**

SUEZ Recycling and Recovery UK Ltd (hereafter referred to as SUEZ) has reviewed the documents associated with Merton Local Plan 2020 Stage 2 Consultation (MLP2020), and our formal comments are provided below.

Background

SUEZ owns and operates a waste and recycling facility on Benedict Wharf, Hallowfield Way, Mitcham. As you are aware, SUEZ is currently working in collaboration with London Borough of Merton (LBM) to deliver an outline planning application, for the change of use of the site from its Safeguarded Waste (SW) and Strategic Industrial Land (SIL) designations, to residential. The first stage of community engagement has recently been completed and following further stages of consultation in early 2019, the planning application is likely to be submitted in March.

As set out in the Call for Sites submission in January 2018, SUEZ has operated at Benedict Wharf since 2000 when the majority of the site was acquired as part of the acquisition of United Waste. The former Mitchanol Ink works was purchased separately in 2007.

The site currently contains a Waste Transfer Station (WTS) which bulks non-recyclable 'residual materials for transfer and processing elsewhere, a Materials Recycling Facility (MRF) for the sorting and separation of recyclable materials for transfer and processing elsewhere and a range of ancillary infrastructure such as processing equipment, storage and a weighbridge / site offices and parking.



As the facilities have developed in a gradual, 'ad-hoc' manner since around 1989, the site is not as efficient as modern waste management infrastructure. There is only one weighbridge for all activities and this is located within the central area, making vehicle circulation less effective than modern facilities.

During recent years the waste industry has been in a rapid transition and SUEZ has progressed from being a predominantly landfill dominated waste disposal business, to a model which focuses on resource management and the recycling and recovery of secondary raw materials. Operations are now typically more industrial / manufacturing in character and require similar land, facilities and infrastructure. In order for waste management facilities to be viable and sustainable, particularly in London and the South East, it is essential that operations can be undertaken with efficient processing technologies, economies of scale and in a relatively unconstrained environment. Particularly critical is the ability to transport materials 24 hours a day, or certainly having the flexibility to transport during some of the less congested hours.

In 2008, a planning application was submitted to LBM for the development of an 'ecopark' comprising a modern and efficient MRF and an AD facility for the generation of electricity and processing of degradable waste into commercial compost/ soil enhancer, plus ancillary facilities. The proposal included a comprehensive redevelopment of the Benedict Wharf site including landscaping and environmental improvement works.

Planning permission was granted in 2012 following a call in by the Mayor of London and the permission was implemented in 2015. However, it has not proven to be economically viable to fully develop the permission due to a range of constraints associated with both the nature of the direct surroundings of the site and controls/ conditions, which the eco-park permission was subject to, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
- Vehicle movements associated with the development were only permitted between 07:00 and 17:00 Monday – Friday, 07:00 and 12:00 on Saturday and no vehicle movements on Sundays or bank holidays.
- SUEZ to minimise the overall number of bulk haulage vehicle movements to be undertaken during peak school run periods - 08:30 – 09:15 and 14:45 – 15:45.
- SUEZ collection vehicles and bulk haulage vehicles contracted to SUEZ to generally seek to avoid the eastern section of Church Road where practical during all other time periods.
- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

Benedict Wharf continues to operate under the variety of historical planning permissions granted in the 1980's/90's/00's. However, as the site is so constrained, SUEZ took the decision to purchase a new site on Beddington Lane within the London Borough of Sutton (LBS). The site is allocated for waste uses and has an extant planning permission for 350,000 tonnes per annum (TPA) of waste processing and benefits from flexible operating hours, as expected within a SIL.

SUEZ has submitted a planning application for the Beddington Lane Resource Recovery Facility (RRF) to LBS which builds on the principle of the extant consent but delivers significant operational improvements (reference: DM2018/01865). The statutory target determination date for the application is 14 February 2019.

The planning application for Beddington Lane RRF is intrinsically linked to the proposed change of use at Benedict Wharf. SUEZ must deliver continuity of service, without interruption, throughout the relocation process. Therefore, should planning permission be granted at Beddington Lane RRF, SUEZ would commit to funding the construction of this new facility in advance of closing the existing operation at Benedict Wharf. However, the project is a reinvestment strategy so there is a need for certainty that a new, marketable use can be delivered at Benedict Wharf and expenditure can be recouped, prior to any construction work beginning at Beddington Lane RRF. Funds are committed to deliver this project within 2019, subject to planning success at both sites and discussions have been ongoing with developers interested in Benedict Wharf. Therefore, there is certainty about the deliverability of the site for housing, subject to the planning permissions being granted.

Vision and Strategic Objectives

SUEZ, therefore, welcomes the recognition at paragraph 1.24 within the Vision and Strategic Objectives chapter of MLP2020 that within the plan period *“the former Benedict’s Wharf will have provided new homes and business space, complimenting their conservation area settings and supporting greater access to the Wandle Trail, fauna and flora in the surrounding parks for new and existing residents”*.

SUEZ also supports Strategic Objective 3: Housing, as set out below, which recognises the need to provide new homes by delivering higher density new homes. However would suggest some amendments to this text to further qualify the statement *‘in places with good public transport access’* and reflect the identification of the Wimbledon-Croydon Tramlink as part of the Trams Triangle, a growth corridor for the delivery of homes and jobs, within the Draft London Plan.

Strategic Objective 3: Housing

To provide new homes and infrastructure within Merton’s town centres and residential areas, through physical regeneration and effective use of space.

We will achieve this by:

- a. *Delivering higher density new homes and associated infrastructure and social facilities that respect and enhance the local character of the area, in places with good public transport access;*
- b. *Delivering community services and infrastructure to support new homes through new development and the effective use of space.*

SUEZ also supports Strategic Objective 4: Environment, which reflects the need to apply the waste hierarchy where waste is minimised, re-used and recycled and residual waste is disposed of sustainably in the right location, using the most appropriate means.

Policy N3.2, Mitcham

Benedict Wharf is identified as site Mi1 within Policy N3.2, 'Mitcham'. SUEZ supports the Council's suggested site allocation of *"Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable."* As aforementioned, in 2012 SUEZ was granted planning permission for a redevelopment of Benedict Wharf to an 'eco-park' development. This permission was implemented but it has never proven viable to develop due to the significant controls on operational hours and vehicle movements which would render it impossible to import, export and process enough material.

The forthcoming masterplan for Benedict Wharf proposes a residential led development which has been influenced by engagement with the community, residential developers and registered social landlords. As evidenced by the implemented eco-park permission, traffic movements associated with industrial uses were strictly controlled. It is, therefore, sensible that any other uses on site are complementary to the residential development and not a continuation of conflict with surrounding land uses.

Paragraph 6.5.1 of the draft London Plan highlights that SIL's *"are given strategic protection because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses and particularly residential development."* Furthermore, Policy E5E 'Strategic Industrial Locations', highlights that *"Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis"*, thus highlighting that SILs should be capable of operating on a 24-hour basis.

The eco-park development is not dissimilar in nature to most industrial developments. The main impacts were related to highways movements and noise from both vehicles on site activities within the buildings. The permission proved to not be deliverable and any future consent for industrial development at the site is likely to be subject to the same controls. A change of use to residential would be compatible with surrounding land uses and will facilitate the development of sustainable waste management facilities at Beddington Lane RRF.

The draft London Plan also identifies the Wimbledon-Croydon Tramlink as part of the Trams Triangle and part of a growth corridor for the delivery of homes and jobs. The location of Benedict Wharf immediately adjacent to the Tramlink provides an opportunity to deliver a significant number of homes in accordance with Strategic Objective 3 of MLP2020.

The draft London Plan includes a provision to release SIL land via policy E7 'Industrial Intensification, co-location and substitution'. Part B is the relevant section which states that SIL can be considered for intensification in order to release land for other uses:

"Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications." (including minor suggested changes)

Furthermore, part F, indicates that there is also the potential for LPA's to substitute industrial capacity elsewhere, both within and outside of London where there is mutual benefit to collaboration partners inside or outside of London, full regard is given to the implications and there is a clearly defined strategy to be delivered by a Plan Led process.



The reallocation of the site and the relocation strategy complies with the principle of policy E7 as the waste capacity will be retained and increased and industrial floorspace and employment will be transferred to a currently vacant site within a SIL in an adjoining Borough. In addition, the release of Benedict Wharf to residential use will provide a significant number of homes directly adjacent to the Tramlink.

The site allocation text within site Mi1 of Policy N3.2 also notes that *“Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area. The council will only support reallocation where the waste management capacity and function is moved within the South London Waste Plan area.”* The Beddington Lane RRF is located within the South London Waste Plan area and the relocation strategy therefore complies with the proposed site allocation. The current planning application for Beddington Lane RRF is due to be determined in early 2019 and if planning permission is granted, SUEZ would fully construct the site prior to leaving Benedict Wharf. However, because this is a reinvestment project, SUEZ also needs to ensure that a new use can be identified for Benedict Wharf in order that it can be successfully marketed to fund the relocation.

Housing

SUEZ supports the allocation of the Benedict Wharf site for residential use. SUEZ supports Policy H4.3 in that it seeks to encourage a mix of housing sizes that will meet the needs of different households. However, with regard to the Borough wide housing mix targets, draft London Plan Policy H12 states that *“Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes”*. Furthermore, it does not appear that the proposed housing mix set out in MLP2020 Policy H4.3 accords with mix set out in the 2017 London Strategic Housing Market Assessment which suggests a need for 55% 1Beds, 16% 2Beds and 29% 3+Beds. As such we consider that the housing mix for market and intermediate homes should be market led.

Infrastructure

SUEZ supports Strategic Policy W6.3 relating to waste management, specifically the continued work as a South London Waste Plan grouping, pooling apportionments rather than seeking to deal with need as individual Boroughs. In SUEZ experience this kind of partnership working provides additional flexibility to the market in identifying and delivering sustainable strategic waste facilities, such as the current example at Benedict Wharf and Beddington Lane RRF.



Economy

SUEZ supports the amended boundary for the Hallowfield Way and Benedict Wharf SIL as outlined within paragraph 7.2.14 of the Economy section of MLP2020. This confirms that Benedict Wharf is proposed for reallocation, as follows: *“Area with single access off Hallowfield Way proposed for reallocation”*.

Please do not hesitate to contact me on the details below if you require any further information or have any queries.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Kris Furness".

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