

Future Merton  
Merton Civic Centre  
London Road  
Morden  
SM4 5DX

recycling and recovery UK

Ref: 0001.SUEZ.ES.MLPS3

15 September 2021

Dear Sir or Madam,

**Merton Local Plan  
Stage 2A Consultation**

SUEZ Recycling and Recovery UK Ltd (hereafter referred to as SUEZ) has reviewed the documents associated with Merton Local Plan 2020 Stage 3 Consultation (MLPS3), and our formal comments are provided below.

**Chapter 01b. Good Growth**

**Density and mixed uses**

Page 19, paragraph 2 within this section repeats Morden twice, as follows.

*“We will expect high quality developments with higher densities, where appropriate, that can appropriately be delivered by the efficient use of land, particularly in neighbourhoods with good accessibility to public transport and in Merton’s Opportunity Area. In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, **Morden**, South Wimbledon, **Morden** and Colliers Wood”*

SUEZ assume that one of these references should be Mitcham, to accord with the high residential growth potential classification set out in the London Plan Town Centre Network.

Page 19, paragraph 4 states that taller buildings can be right in some locations, subject to excellent design, good public transport accessibility, impact on existing character, heritage and townscape. However, London Plan Policy D9, ‘ Tall Buildings’ states that Development Plans should define what is considered a tall building

for specific localities (not less than 6 storeys or 18 metres) and determine if there are locations where tall buildings may be an appropriate form of development and identify these on maps in development plans.

The accompanying text at paragraph 3.9.2 of the London Plan states that Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking three steps:

- “1. based on the areas identified for growth as part of Policy D1 London’s form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place*
- 2. in these locations, determine the maximum height that could be acceptable*
- 3. identify these locations and heights on maps in Development Plans.”*

The aim of the policy and accompanying text in the London Plan is to provide some certainty on what would constitute a tall building in different areas of the Borough and where those buildings may be appropriate, in a highly visible and clear way. However, the text on Page 19, paragraph 4 of MLPS3 provides a broader description of the suitability of tall buildings. It is noted that Policy D12.6 of MLPS3 is specific to tall buildings, however, once again, this provides a less specific framework than is required by London Plan Policy D9 and the accompanying text by specifically, identifying appropriate areas, determining maximum heights and identifying those on maps.

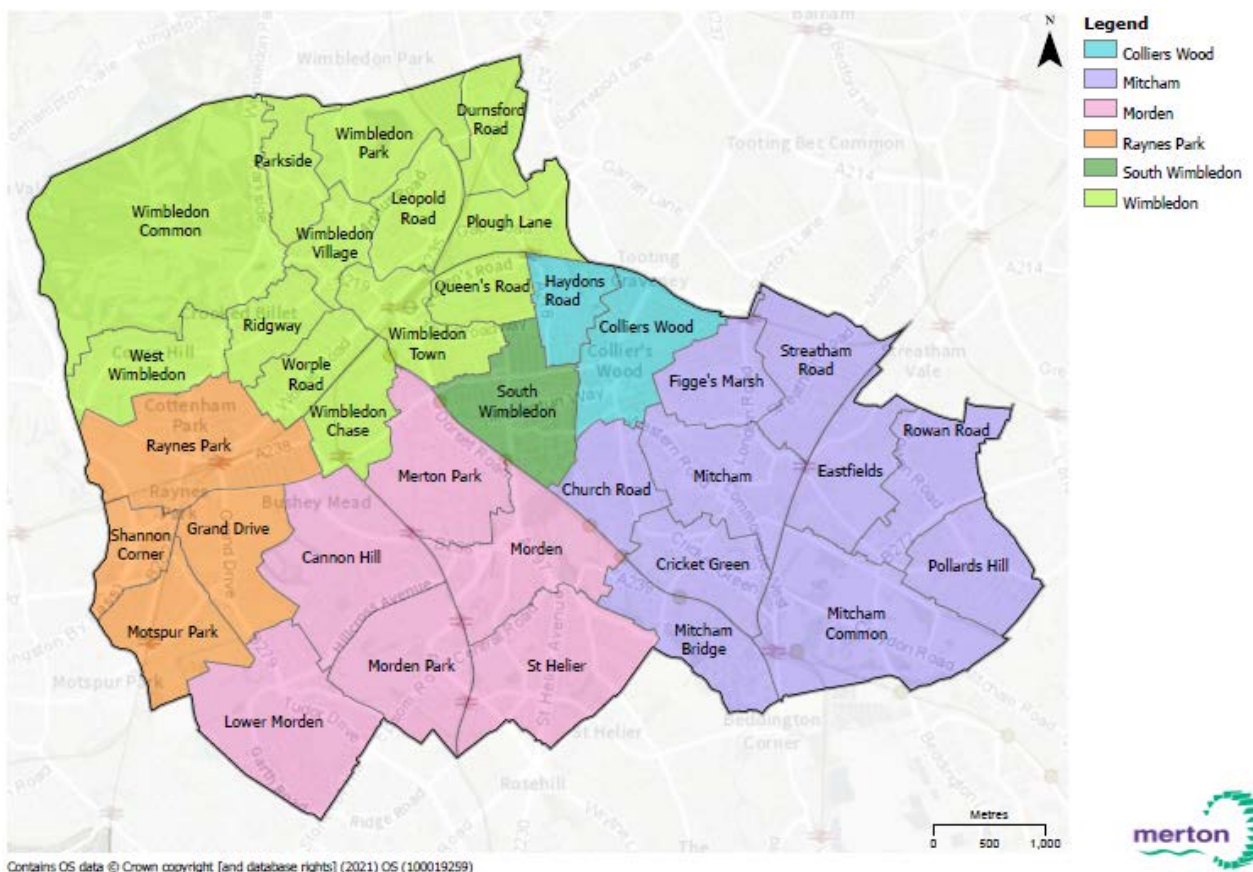
As much of Merton’s growth is to be within the Opportunity Area (OA), it would be useful to understand specifically where the approach to tall buildings could be applied in order to be consistent with the London Plan. The outline planning application for Benedict Wharf which has been approved subject to the completion of a Section 106 agreement, permits the construction of buildings up to 10 storeys.

### **Identifying Merton’s Growth areas**

Figure 1 within this section shows Merton’s Spatial Strategy, however, the visibility of key development sites overlays other designation data, for example, the figure suggests that site Mi1, ‘Benedict Wharf’ is outside of the OA, whereas Figure 2 and the OA Policies Map demonstrate that the site falls within the OA. A simple amendment overlaying the OA hatching above the site allocation could rectify this and ensure consistency with maps and figures throughout the Local Plan.

As with the Merton Local Plan Stage 2A consultation, there remains some inconsistency between the description of the OA and the location of the neighbourhoods on the policies map. For example, Mitcham is identified as an area 'Outside the Opportunity Area', however, the policies map clearly demonstrates that the OA falls within Cricket Green, Church Road and Mitcham Bridge. SUEZ would recommend a simple amendment to the text to reflect that the OA does fall within some of the neighbourhoods within Mitcham and those areas will be targeted for higher growth.

Figure 1 – Merton's spatial strategy



## **Chapter 01C. Urban Development Objectives & Vision**

SUEZ support the overarching aims of the urban development objectives and vision. Tackling climate change and ensuring resource efficiency are key priorities of SUEZ.

We also support the target to deliver more homes and prioritise walking, cycling and public transport and to ensure that development makes the most efficient use of land and that development is designed at the optimum density. This is consistent with London Plan policy D3 and National Planning Policy Framework (NPPF) Chapter 11.

## **Chapter 2 Climate Change**

SUEZ welcome policy CC2.5 requiring a circular approach and encouraging the use of recycled materials. This is consistent with paragraph 3.3.10 of London Plan to “minimise the use of new materials” and Policy SI 7 ‘Reducing waste and supporting the circular economy’.

## **Chapter 04 – Mitcham**

### **Site Mi1 – Benedict Wharf**

SUEZ are the owner of Benedict Wharf and support the allocation of the site for housing.

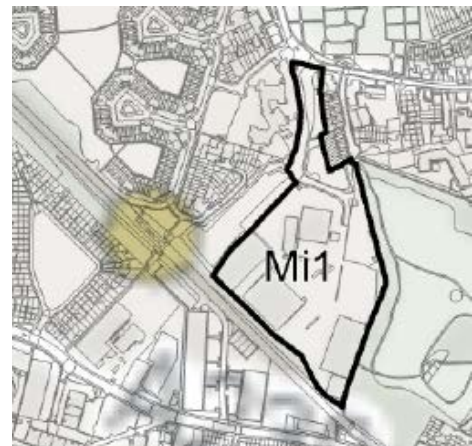
The outline planning application for the residential redevelopment of Benedict Wharf was determined by the Deputy Mayor of London following a public hearing on 8 December 2020. The Deputy Mayor resolved to grant conditional planning permission subject to the prior completion of a Section 106 agreement.

A Holding Direction was issued by the Secretary of State on 7 December 2020. This Holding Direction prevented planning permission being issued until the Secretary of State considered the application and reached a conclusion on whether the application should be called in for his own determination. This Holding Direction was lifted on 18 May 2021 and the Secretary of State has confirmed that he is content for the application to be determined by the Local Planning Authority (the Mayor of London).

The Section 106 agreement is at an advanced stage and is likely to be completed in September 2021. The planning permission can then be issued, which would enable the sale of Benedict Wharf for residential development, and the construction of our new site (S12 within the South London Waste Plan - Beddington Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH) could then commence. The Section 106 Agreement for Benedict Wharf is subject to a restriction preventing the redevelopment of Benedict Wharf from commencing, until the compensatory capacity at Beddington Resource Recovery Facility is operational.

The redevelopment of Benedict Wharf aligns with the emerging South London Waste Plan, which has just progressed through examination and allocates Beddington Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH as a safeguarded waste site and no longer safeguards Benedict Wharf.

There is an inconsistency between the site allocation figure shown under site Mi1, which includes the adjacent car pound site which is in third party ownership, and the site allocations map as part of the Local Plan, which only includes the SUEZ owned land, as follows:



It is notable that the approach to tall buildings section of the site allocation text states: *“The size of the site allows for a masterplanned approach which could contain taller buildings.”* While this is a true statement, the outline planning application which has been approved subject to completion of the section 106 agreement includes buildings up to 10 storeys. SUEZ, therefore, consider that this level of detail could be included within the text.

## Chapter 12 Places & Spaces in A Growing Borough

### Policy D12.6 Tall buildings

As aforementioned, the London Plan Policy D9, ‘ Tall Buildings’ states that Development Plans should define what is considered a tall building for specific localities (not less than 6 storeys or 18 metres) and determine if there are locations where tall buildings may be an appropriate form of development and identify these on maps in development plans.

However, policy D12.6 is less specific and although individual site allocations contain a reference as to whether tall buildings may be appropriate, there is no reference to analysis of what would constitute tall in any circumstance, other than the definition of minimum 6 storeys. SUEZ consider that more clarity could be provided within the tall building policy or allocations, for example, by providing some clear coding for those sites where tall buildings may be acceptable, on the Site Allocations map.

I would like to confirm my interest in attending the examination in public, particularly relating to the above points and the allocation of Benedict Wharf. I will provide further confirmation when the planning permission for Benedict Wharf has been issued.

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 black ink, appearing to read "ESmyth".

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