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Good afternoon,

Please find attached SUEZ Recycling and Recovery UK Ltd comments on the Merton Character Study.

Thanks,



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Ref: 0001.SUEZ.KF.MCS21

23 March 2021

Dear Sir or Madam,

### **Merton Character Study 2021**

SUEZ Recycling and Recovery UK Ltd (hereafter referred to as SUEZ) has reviewed the Merton Character Study 2021 and our formal comments are provided below.

#### **Why do we need the Study?**

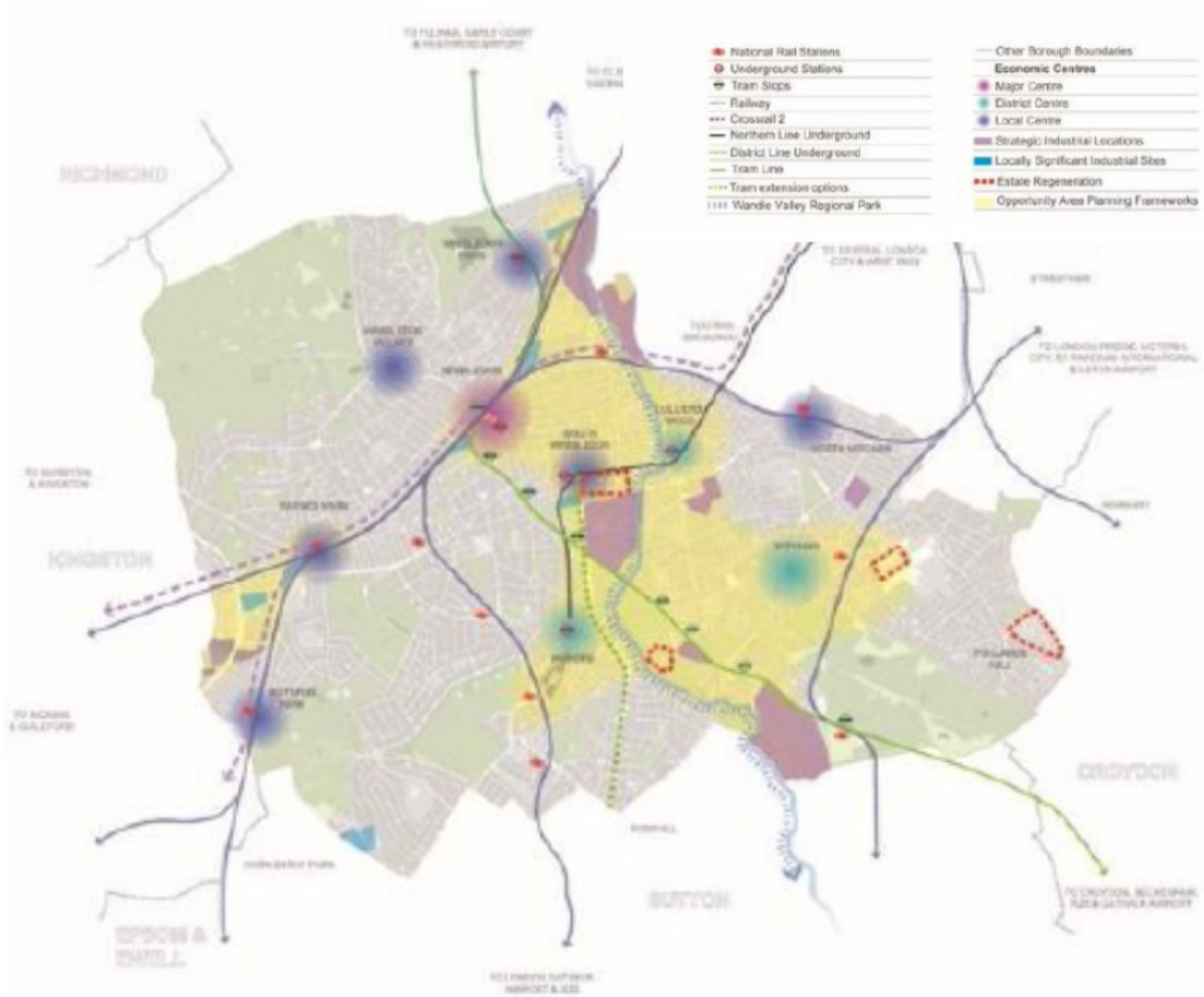
SUEZ support the recognition that the New London Plan (March 2021) seeks to deliver growth. The Stage 2a Merton Local Plan highlighted that there is limited land in the borough to accommodate growth and so there is a need to use land more efficiently. It would provide additional context if this information was repeated in the introduction of the Character Study, along with a recognition that policy H1 of the London Plan requires Boroughs to optimise the potential for housing delivery on *all* suitable and available brownfield sites.

#### **H Mitcham**

The Good Growth Strategy in the Merton Stage 2a Local Plan highlights that Merton's main growth will be within the Opportunity Area, and the Key Diagram highlights that this includes much of the Tramlink corridor and Mitcham. However, there is little reflection of this within this section of the Character Study.

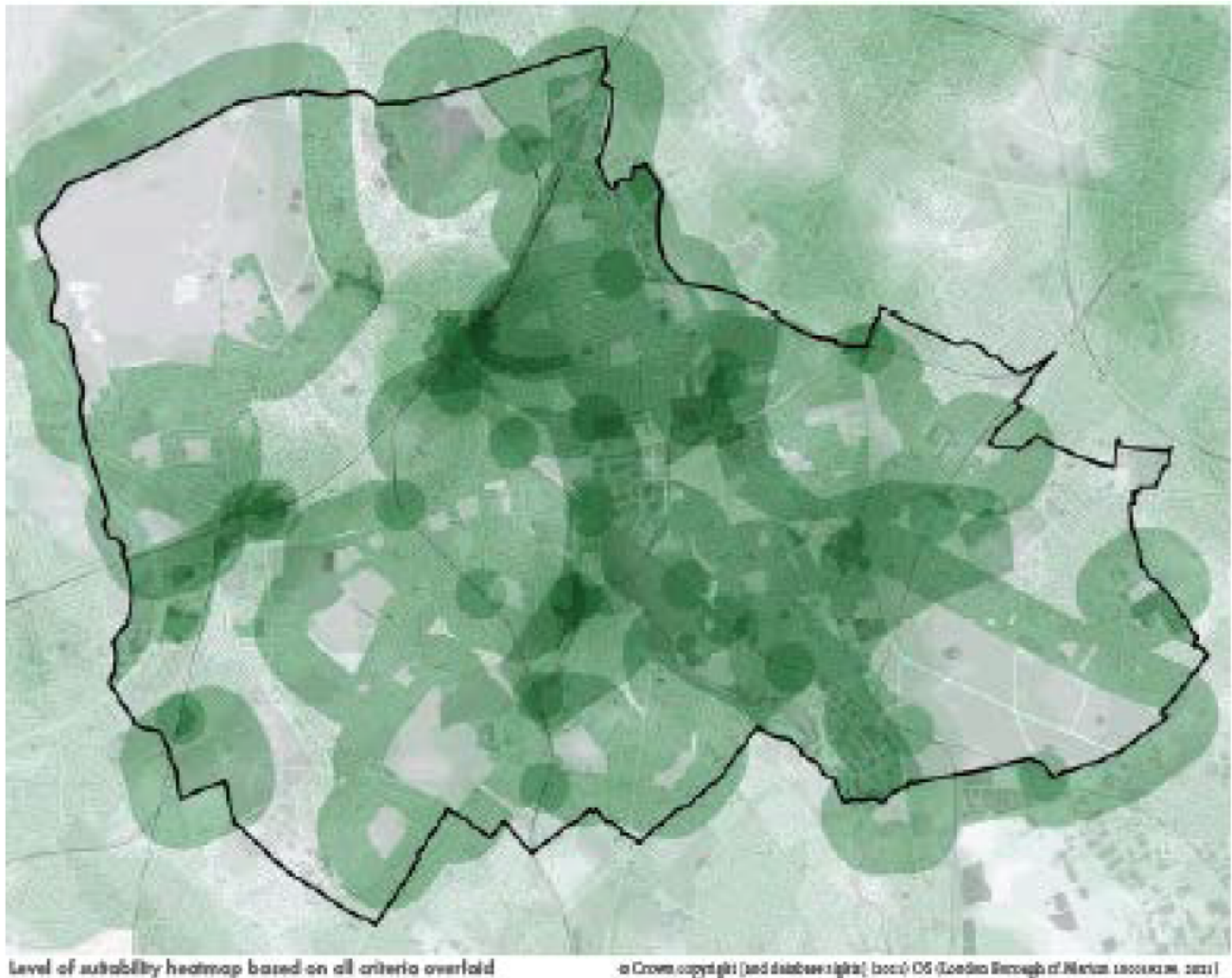
SUEZ propose that further text is included within the introductory text about Mitcham, providing greater consistency with the draft Local Plan and a recognition of scale of the Opportunity Area and the potential growth corridor adjacent to the Tramlink.

Figure 1 – Good Growth Strategy Key Diagram



Policy H1 of the London Plan specifically references that sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary should be optimised. It is clear from the heatmap of suitability for tall buildings at page 137 within the Character Study (Figure 2), that Mitcham provides significant potential for growth in this regard. SUEZ, therefore, recommend that in order to be consistent with the Local Plan, the Mitcham section positively reflects that there may be opportunities for tall buildings.

Figure 2 – Level of Suitability for Tall Buildings (Page 137)



## Tall Buildings

This section suggests that the definition of tall buildings should follow the London Plan suggestion of minimum 6 storeys. The text then continues to state that:

*“It is highly unlikely that a tall building would be appropriate in low-scale, residential area (i.e. consisting of 2-3 storey suburban houses) which accounts for most of the borough”*

SUEZ propose that further clarification is included to highlight that this relates to small scale infill developments. There will be occasions on unconstrained sites, such as Benedict Wharf, where there is an opportunity for taller buildings and higher density development.



For example, the planning application for Benedict Wharf has clearly demonstrated that the site is acceptable for buildings in excess of 6 storeys and this was supported by the findings of Design Review Panels and evaluation of a Townscape Heritage and Visual Impact Assessment. The site sits within an area of high suitability as identified on the heatmap at page 137 (figure 2).

An amendment to this section would reflect the requirements of the London Plan policy D3, which requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

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

Yours faithfully,