

Ms Carmel Edwards
c/o Strategic Planning Department
London Borough of Sutton
24 Denmark Road,
Carshalton
SM5 2JG

recycling and recovery UK

Our Ref: SUEZ.KF.SLWP.EIP.2021.1

15 July 2021

Dear Ms Edwards,

South London Waste Plan Examination in Public
Written Statement – Matter 2: Is the Plan in general conformity with the London Plan

Thank you for the opportunity to comment on the South London Waste Plan Inspectors' Matters, Issues and Questions. Please accept this document as the formal response of SUEZ Recycling and Recovery UK Ltd (SUEZ) relating to Matter 2.

Issue (i) Question 3: *Is the restrictive approach set out in Policy WP3(d) consistent with the London Plan's aspiration to achieve net self-sufficiency in waste management terms by 2026? Should the Plan be modified to offer more support for the development of compensatory provision where sites outside of the South London boroughs are released for non-waste development in the specific circumstances outlined in the London Plan (i.e. where "a waste site may be lost, compensatory capacity should first be explored within the borough. In cases where this can't be provided, and suitable capacity is found in another borough, the receiving borough or joint waste planning group is encouraged to take on the apportionment and include it as part of their Development Plan")?*

SUEZ has considerable experience in applying the 'compensatory' provision policies of the London Plan. In addition to our proposed relocation from Benedict Wharf to Beddington Resource Recovery Facility, in 2017 we sought to relocate from a heavily constrained site in another London Borough and reinvest the proceeds of the sale of that site into new developments in London. Successfully securing a planning permission for the change of use of the constrained site would have provided a significant uplift in value, which would have been tied to other identified investments in London that would increase waste management capacity.





Adopted planning policy in the Borough where the constrained site was located prevented the release of waste sites, unless compensatory capacity was to be provided within that Borough. There were no suitable and available sites within that Borough and no mechanism to relocate capacity elsewhere in London, therefore, despite the significant benefits and support from the Greater London Authority, SUEZ was unable to proceed with the strategy.

The London Plan 2021, therefore, aims to offer flexibility to account for those rare circumstances where relocation to another Borough or Waste Plan area is the key to meeting the other priorities of the plan, for example, driving waste up the hierarchy or enabling significant investment.

Paragraph 9.8.10 of the London Plan 2021 is clear that *“Waste plans should be responsive to strategic opportunities across borough and joint waste planning boundaries for optimising capacity on existing waste sites, or that help to unlock investment in developing new waste sites. Where a waste site may be lost, compensatory capacity should first be explored within the borough. In cases where this can’t be provided, and suitable capacity is found in another borough, the receiving borough or joint waste planning group is encouraged to take on the apportionment and include it as part of their Development Plan.”* Paragraph 9.8.3 of the London Plan 2021 notes that waste contracts do not recognise administrative boundaries and waste flows across borders, the aim of policy is to ensure that London can manage its own waste. Policy WP3(d) removes this flexibility and is not consistent with the London Plan 2021.

The market for industrial land in London is highly competitive and recent trends have been inflationary. Competition, along with constrained supply often drives up prices to levels which are unviable for recycling, resource management and waste operations. This is reflected within the Submission South London Waste Plan, Key Issue 3 ‘Scarcity of Land’ and is not limited to the South London Waste Plan Boroughs.

Many existing vacant industrial/employment units are often not suitable for waste management operations as they are commonly designed with raised loading bays, internal structural supports or roof heights which are too low for loading waste and recycling vehicles and technology. Insufficient external storage space for recycled products or collection vehicles is also a common issue. This reduces the ‘pool’ of sites available to the sector and increases the need for flexibility.

The South London Waste Plan is set to benefit from the application of the compensatory capacity policy. SUEZ’ relocation from Benedict Wharf in London Borough of Merton, to Beddington Resource Recovery Facility in London Borough of Sutton, will significantly increase waste management capacity as demonstrated in E10: South London Waste Plan Technical Paper. Furthermore, the relocation facilitates the redevelopment of Benedict Wharf to housing, providing 850 homes of which 35% will be affordable.

NPPG for Waste, Paragraph 046 (Reference ID: 28-046-20141016), highlights that *“there may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities that were not anticipated.”* Paragraph 11 of the National Planning Policy Framework (NPPF) highlights that *“plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;”*. Both of these concepts would apply to a scenario where an operator may need or want to relocate to another area.

Figure 1 - Beddington Resource Recovery Facility Illustrative Visualisation



There is no reason to restrict one area of the industrial sector. Modern recycling and recovery facilities are often impossible to differentiate from industrial and manufacturing operations. They provide employment, social, economic and environmental benefits. New recycling and recovery developments must meet the design requirements of London Plan 2021 and policy WP6 within the submission South London Waste Plan. The committee report for the Beddington Resource Recovery Facility (London Borough of Sutton planning application reference DM2018/01865) highlights, *“The proposal would exceed policy requirements in terms of sustainable construction and design and would provide a net gain in biodiversity.”* One of our developments



has been praised as an 'exemplar' by The Commission for Architecture and the Built Environment, another was awarded Sustainable Project of the Year.

Read together, it is clear that policy WP3(d) would be inconsistent with the London Plan 2021, but also with the NPPF and NPPG. A more appropriate policy would enable relocation where there are significant benefits, for example, driving waste up the hierarchy, increasing the contribution to London's waste management or reducing carbon intensity.

I would be happy to attend the examination to expand on any of the points raised in this submission or previous representations.

Yours faithfully,

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

Kris Furness
Senior Planning Manager

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