

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.2021.3

15 July 2021

Dear Ms Edwards,

### **South London Waste Plan Examination in Public**

#### **Written Statement – Matter 4: Does the Plan set out an effective suite of policies for the management of waste in the area; and are they justified and consistent with national policy?**

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 4.

**Issue (i), Question 1:** *Are the criteria (In Policy WP5 (b) and the “issues to consider” element of the site descriptions) and the target in Monitoring Indicator 5 relating to the development of new sites in fully enclosed covered buildings justified, particularly as Policy SI 8 (E)(4) of the London Plan is less directive in this respect? Would the requirements restrict the type of waste operations that could be carried out on a site and thus inhibit the management of waste further up the waste hierarchy?*

Policy E7 of the London Plan 2021 recognises that industrial developments have “operational yard space requirements” and paragraph 6.4.1 of the London Plan 2021 includes waste management and recycling within the typical description of industrial, logistics and related uses.

SUEZ operate several facilities around the UK with external storage for loose or baled recovered product, with no amenity issues. SUEZ, therefore, consider that this would be more appropriately considered on a case by case basis, with use of planning conditions restricting external operations and storage where necessary. There are already provisions to protect amenity in policy WP5 (a) and (c), therefore, part (b) could be removed.



**Issue (v), Question 1:** *What is the distinction between “an existing waste site”, “an extant scheme” and a “permission for additional capacity”?*

SUEZ welcomes the inclusion of a policy embedding the Agent of change principle. However, agree that the wording of policy WP8 could be simplified by using consistent terminology in parts (a) and (b).

This could potentially be achieved by referring to ‘existing, consented or safeguarded’ sites in parts (a) and (b). This would provide certainty that any new noise sensitive development would be responsible for mitigating the impact of noise or nuisance, taking account of potential intensification, in all circumstances where the facility is reasonably committed (i.e. it exists, is allocated/safeguarded, or has a permission).

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

Yours faithfully,



Kris Furness  
Senior Planning Manager

T: 0191 258 8264  
M: 07974 233 294  
E: kris.furness@suez.com