

SUEZ Recycling and Recovery UK Ltd comments

Page: [Policy D1 London's form and characteristics](#)

Section: [3.1.8](#)

SUEZ Recycling and Recovery UK Ltd supports this requirement, however, it may be prudent to ensure that developers consider where separate materials can be stored within the property, as well as externally.

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) supports this policy but it appears to be inconsistent with Paragraph 3.1.8. SUEZ R&R recommends that the policy is amended to require adequate storage of 'other waste' in addition to dry recyclables and food. Furthermore, SUEZ R&R recommends that this requirement should be considered internally and externally.

Page: [Policy D12 Agent of Change](#)

Section: [D12](#)

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) supports the introduction of the Agent of Change principle. SUEZ R&R is currently working towards the relocation from 2 sites in London which are situated in close proximity to residential dwellings and are consequently not suitable for modern recycling and resource recovery operations. It is essential that existing facilities are safeguarded from encroachment by sensitive developments which constrain operations.

SUEZ R&R recommends that this policy is referenced specifically within Policy SI9 'Safeguarded Waste Sites'.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) considers that part 3 of this policy should be removed. The accompanying text at paragraph 4.6.6 states

“Given the difference in values between industrial and residential development, where Strategic Industrial Locations, Locally Significant Industrial sites or other industrial sites are deemed acceptable for release (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function, they are expected to deliver a higher level of affordable housing...”

In SUEZ R&R's experience, industrial land is often subject to several constraints which significantly increase the cost of development. Industrial land is often subject to contamination, existing development is typically low height and surrounded by other low height, low density uses and can be difficult to intensify. Industrial land is also regularly impacted by railway infrastructure or power/energy distribution networks. Furthermore, development on industrial land can often require greater provision of landscaping or other associated works.

The assertion that residential development on industrial land can afford to contribute more affordable housing due to differences in land value is too broad and may result in the situation where other elements of a development suffer due to increased affordable housing contribution. Affordable housing policy should apply consistently to all land uses.

Furthermore if sites are released from SIL through the Local Plan making process it is considered that the threshold for affordable housing should be 35% not 50%. The requirement to provide 50% is likely to stall and stifle development rather than encouraging it.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [E4](#)

E4 - A3

SUEZ Recycling & Recovery UK Ltd (SUEZ R&R) agrees that Local Planning Authorities should identify sufficient land and premises to meet the need of current and future industrial and related functions. However, it is important to stress that, while National policy (National Planning Policy for Waste (NPPW)) highlights that industrial locations are generally most appropriate for recycling and resource management / waste operations, there are specific circumstances in London which need to be taken into account when the Boroughs draft their own Local Plans and allocate sites.

Generally, industrial/employment units are often designed with raised loading bays, roof heights which are too low for loading waste and recycling vehicles and technology, and insufficient external storage space for recycled products. Furthermore, competition for space on industrial estates is significant and this drives up prices to levels which are unviable for recycling, resource management and waste operations. Particularly if significant amendments / rebuilding would be necessary.

SILs and other industrial sites may provide the most appropriate locations in general terms, but any Local Plan needs to take account of the above considerations when ensuring sufficient land / premises are available with the correct characteristics. Collaborative planning for waste by the Boroughs should provide flexibility in locational / viability issues, for example, one Borough may have facilities which are mostly suitable for waste transfer operations, where another may have undeveloped industrial plots more suited to larger scale processing facilities.

SUEZ R&R, therefore, recommends that accompanying text is added to the London Plan to outline the above requirements and part A.3. of Policy E4 is amended to state:

*A sufficient supply of **viable and deliverable** land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for...*

E4 - C

SUEZ R&R agrees that industrial land should be planned, monitored and managed. However, while this Draft London Plan makes provision to strongly protect existing industrial land from encroachment, there are some existing industrial sites / waste sites which have already been compromised by surrounding residential uses. Furthermore, as processes and places have evolved, some sites which hold industrial designations are not suitable for sustainable modern recycling and resource management / waste management operations.

SUEZ R&R currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

SUEZ R&R submitted a planning application for the redevelopment and modernisation of the Hallowfield Way site in 2008 and permission was granted in 2012 following call-in by the Mayor of London, after refusal by the LPA. During the determination of the planning application, due to the sensitive nature of the surroundings, SUEZ R&R had to accept several constraints in order to achieve planning approval, 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 R&R 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 R&R collection vehicles and bulk haulage vehicles contracted to SUEZ R&R 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).

In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / 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.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to *“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”*. Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow ‘pinch points’ and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

The alternative site in South London is also located on SIL land. The site is vacant and contains no buildings, therefore, any construction on the site will provide new industrial floorspace. In accordance with the general principles of the draft London Plan, this would ensure that there was no net loss of industrial floorspace and could facilitate the redevelopment of Hallowfield Way in Merton for other uses. Any revenue raised from the sale of the constrained Hallowfield Way site would be reinvested into the purchase and construction of the new replacement site.

However, when reviewing the explanatory text at paragraph 6.4.5, it is not clear whether the draft London Plan would support this.

“Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater)”

The policy and accompanying text leave it open to interpretation that the new site already has a floorspace capacity at 65% of the plot, even though it is currently vacant and has been for several years. If that was taken to be the case, then the plot would not be considered to provide ‘compensation’, for the loss of industrial floorspace at Hallowfield Way, therefore, the existing, constrained site, could only be sold for continued industrial use and value. Whereas, if an undeveloped ‘green field’ or non-designated industrial site had been purchased, this would provide ‘compensation’.

SUEZ R&R believes that that policy E4. C. should make clear that the loss of industrial floorspace is suitable where an equal amount of compensatory floorspace is to be provided elsewhere, even on an existing designated industrial site.

E4 - G

SUEZ R&R supports policy E4.G. While there may be occasions that other uses can be co-located on industrial sites, these proposals should be considered on their merits through the submission of a planning application. Sensitive land uses in industrial settings should be carefully planned to avoid any conflict of interests and to ensure existing occupiers are not constrained.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [E7](#)

E7D

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

SUEZ submitted a planning application for the redevelopment and modernisation of the Hallowfield Way site in 2008 and permission was granted in 2012 following call-in by the Mayor of London, after refusal by the LPA. During the determination of the planning application, due to the sensitive nature of the surroundings, SUEZ R&R had to accept several constraints in order to achieve planning approval, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
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- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / 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.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to "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". Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow 'pinch points' and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a 'blank canvas' it is unlikely that it would be designated as SIL today.

Taking account of the above constraints, SUEZ R&R, considers that the London Plan should contain a policy which also allows SILs to be considered for mixed use or residential development where the SIL has been constrained and compromised. Policy E7D, could be amended to state:

1. *Mixed-use or residential development proposals on **SILS, LSIS and** Non-Designated Industrial Sites will be supported where:*
 1. *it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or*
 2. *there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or*
 3. *industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or*
 4. *suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.*

The above wording still provides protection for SILS which are viable, however, would facilitate a sensible review of those sites which cannot sustainably accommodate industrial uses in the longer term. Those sites can then be released to contribute to other community needs, such as significant residential delivery.

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [E5](#)

E5D

SUEZ Recycling & Recovery UK Ltd (SUEZ R&R) welcomes the inclusion of this policy and recognises that, generally, SILs should be protected. However, where sites have already been compromised and constrained, it is not sensible to require retention when the site could meet other needs more sustainably.

SUEZ R&R currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

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In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / 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.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to *"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"*. Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow 'pinch points' and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a 'blank canvas' it is unlikely that it would be designated as SIL today.

Taking account of the above, SUEZ R&R, therefore recommends that the site should be removed from SIL designation and/or the policy should be reworded as follows

1. *Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused **except where it can be demonstrated that the operation of the SIL has been compromised and is no longer considered to be compatible with surrounding land uses**, or in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.*

E5E

SUEZ R&R welcomes this policy. It is essential that existing facilities are safeguarded from encroachment by sensitive developments which constrain operations.

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [Table 6.3](#)

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

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In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / 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.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to "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". Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow 'pinch points' and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

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Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a 'blank canvas' it is unlikely that it would be designated as SIL today.

Taking account of the above constraints, SUEZ R&R, recommends that Hallowfield Way is removed as SIL. Alternatively, SUEZ R&R recommends that policies are included within the London Plan which allow the designations to be reviewed where sites have become constrained and an opportunity for redevelopment exists.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

A3

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) supports efforts to drive waste up the hierarchy and support a more circular economy, however, we would express caution about the feasibility of ensuring that there is zero biodegradable or recyclable waste to landfill by 2026.

It is important to consider whether materials are technically and economically viable for recycling. Furthermore, in some circumstances, landfill is the most appropriate or only option for the disposal of materials.

SUEZ R&R recommends that the wording is amended to state:

3. working to reduce the avoidable landfill of biodegradable or practically recyclable waste to zero by 2026.

A4

SUEZ R&R supports the increased recycling and recovery of waste materials. However, the challenging targets will require a significant commitment from the GLA and Boroughs to deliver significant new infrastructure.

A5

SUEZ R&R supports this policy but it appears to be inconsistent with Chapter 3. SUEZ R&R recommends that the policy is amended to require adequate storage of 'other waste' in addition to dry recyclables and food. Furthermore, SUEZ R&R recommends that this requirement should be considered internally and externally.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [SI8](#)

SI8 A.1

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) supports the overall aim of this policy for London to take responsibility for its own waste. However, while it may be pragmatic to plan for sufficient capacity for London to achieve net self-sufficiency by 2026. The plan reflects at paragraph 9.8.3 that waste contracts do not recognise administrative boundaries and waste flows across borders.

Constraints on development in London and significantly higher land values may mean that issues of viability drive a net export beyond 2026. There appears to be no 'capacity gap' figure within the plan which identifies the scale of development which will be necessary to achieve this policy. Taking a very basic approach, paragraph 9.8.1 highlights that in 2015, London exported 11.4 million tonnes of waste and imported 3.6 million tonnes. To achieve the policy as currently drafted, the difference of 7.8 million tonnes would need to be accommodated in London by 2026. While some of that capacity may already exist within London, this provides some indication of the scale of infrastructure development which will be necessary and it is unclear whether this is feasible.

SUEZ R&R, therefore, recommends that the wording of the policy is amended as follows:

1. London should work to deliver the equivalent capacity to manage 100 per cent of London's waste within London (i.e. net self-sufficiency) or on collaboration and where mutually beneficial, with their neighbours facilities by 2026

SI8 A.2

SUEZ R&R agrees that it is important to protect recycling and resource recovery / waste management sites and more critically, to ensure that those sites are protected from encroachment which may prejudice their effective and efficient operation. However, there are sites within London which have already been constrained by surrounding land uses and are struggling to operate viably for modern waste management practices.

In order for recycling and resource recovery / 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.

Where sites are already constrained, there should be an opportunity for these to be released if alternative capacity is provided elsewhere within London. To this extent, the GLA needs to take a leadership role in these issues, as Boroughs can take a precautionary stance if their own ability to meet their apportionment is compromised, even where this is of benefit to wider London.

SUEZ has recently been involved in a project where all parties agreed that the release of an existing, constrained waste site was sensible and pragmatic. However, while there was a benefit to London there was a slight negative impact on the releasing Boroughs ability to achieve their apportionment. In this instance if the GLA had been in a position to manually adjust the apportionments to reflect the strategy, or if the Boroughs had been **required** to work together, it is likely that the scheme would have progressed to the satisfaction of all parties and the benefit of Greater London.

SUEZ R&R, therefore, recommends that the GLA needs to take a leadership approach in the release of compromised waste sites where there will be no detrimental impact to the long term future waste management needs of London. This could be undertaken by treating the apportionment tables as a live website resource, rather than a printed table within the plan. Furthermore, SUEZ recommends that the policy is amended as follows:

2. existing waste management sites should be safeguarded, unless the use has already been compromised by surrounding development and alternative capacity is provided elsewhere, to the satisfaction of the GLA (see Policy SI9 Safeguarded waste sites)

SI8 B.2

SUEZ R&R agrees that Local Planning Authorities should identify sufficient land and premises to meet the needs of current and future waste management facilities and apportioned tonnages of waste. It is also important to bear in mind that National policy requires the Boroughs to plan for waste streams outside of those apportioned by the GLA.

However, it is important to stress that, while National policy (National Planning Policy for Waste (NPPW)) highlights that industrial locations are generally most appropriate for recycling and resource management / waste operations, there are specific circumstances in London which need to be taken into account when LPA's draft their own Local Plans and allocate sites.

Generally, industrial/employment units are often designed with raised loading bays, roof heights which are too low for loading waste and recycling vehicles and technology, and insufficient external storage space for recycled products. Furthermore, competition for space on industrial estates is significant and this drives up prices to levels which are unviable for recycling, resource management and waste operations. Particularly if significant amendments / rebuilding would be necessary.

SILs and other industrial designations may provide the most appropriate locations in general terms, but any Local Plan needs to take account of these considerations when ensuring sufficient land / premises are available with the correct characteristics. Collaborative planning for waste by the Boroughs should provide flexibility in locational / viability issues, for example, one Borough may have facilities which are mostly suitable for waste transfer operations, where another may have undeveloped industrial plots more suited to larger scale processing facilities.

Furthermore, SUEZ R&R has recently been involved in a project where all parties agreed that the release of an existing, constrained waste site was sensible and pragmatic. However, while there was a benefit to London there was a slight negative impact on the releasing Boroughs ability to achieve their apportionment. The releasing Borough also had no agreements in place to work with other Boroughs to work collaboratively on waste planning, so it was not possible to identify sites in other joint waste plan areas'.

SUEZ R&R, therefore, recommends that accompanying text is added to the London Plan to highlight that it is not always appropriate to identify existing industrial estates as suitable locations for recycling and resource recovery / waste management as a blanket policy. Furthermore, SUEZ R&R recommends that Boroughs are required to work together, rather than encouraged. The proposed amended policy could be worded as follows:

1. *allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are required to collaborate by pooling their apportionment requirements to the satisfaction of the GLA*

SI8 B.3b

While National policy (National Planning Policy for Waste (NPPW)) highlights that industrial locations are generally most appropriate for recycling and resource management / waste operations, there are specific circumstances in London which need to be taken into account when LPA's draft their own Local Plans and allocate sites.

Generally, industrial/employment units are often designed with raised loading bays, roof heights which are too low for loading waste and recycling vehicles and technology, and insufficient external storage space for recycled products. Furthermore, competition for space on industrial estates is significant and this drives up prices to levels which are unviable for recycling, resource management and waste operations. Particularly if significant amendments / rebuilding would be necessary.

SILs and other industrial designations may provide the most appropriate locations in general terms, but any Local Plan needs to take account of these considerations when ensuring sufficient land / premises are available with the correct characteristics. Collaborative planning for waste by the Boroughs should provide flexibility in locational / viability issues, for example, one Borough may have facilities which are mostly suitable for waste transfer operations, where another may have undeveloped industrial plots more suited to larger scale processing facilities.

SUEZ R&R recommends that accompanying text is provided to ensure that allocations on SIL/LSES are not provided on a blanket basis. There should be a process of review to ensure that existing industrial premises and/or land is suitable for recycling and resource recovery / waste management operations.

SI8 D

As currently worded, the policy implies that the listed items are the most crucial aspects to be taken into account when determining development proposals for new or existing facilities. However, the overall purpose of policy SI8 is to deliver waste capacity and achieve net self-sufficiency and one of the most critical aspects should be the contribution a new facility makes to sustainable recycling and resource recovery / waste management in London.

SUEZ R&R recommends that a new bullet points is included to reference:

1. The contribution of the new facility towards sustainable recycling and resource recovery / waste management in London

SI8 D3.

SUEZ recognises the benefits of achieving a low carbon outcome. However, most EfW within the UK only generate electricity and struggle to identify a viable and deliverable heat network, which would be necessary to meet a carbon intensity floor as stated.

EfW is a critical component in both sustainable energy supply and waste management. If the London Plan will only seek to deliver the most efficient plant it will be necessary for the GLA to take a leadership approach in masterplanning to site energy recovery facilities near to significant heat users. Otherwise, the policy as drafted may restrict the provision of a key element of proven infrastructure which can assist in achieving the goals of net self-sufficiency and zero avoidable biodegradable and recyclable waste to landfill by 2026.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [9.8.4](#)

Para 9.8.4

SUEZ R&R welcomes the inclusion of SRF and RDF within the definition of waste managed within London. SRF and RDF production are key aspects of recycling and resource management / waste operations and assists in driving materials up the hierarchy and reducing reliance on landfill.

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Section: [9.8.8](#)

While National policy (National Planning Policy for Waste (NPPW)) highlights that industrial locations are generally most appropriate for recycling and resource management / waste operations, there are specific circumstances in London which need to be taken into account when Boroughs draft their own Local Plans and allocate sites.

Generally, industrial/employment units are often designed with raised loading bays, roof heights which are too low for loading waste and recycling vehicles and technology, and insufficient external storage space for recycled products. Furthermore, competition for space on industrial estates is significant and this drives up prices to levels which are unviable for recycling, resource management and waste operations. Particularly if significant amendments / rebuilding would be necessary.

SILs may provide the most appropriate locations in general terms, but any Local Plan needs to take account of the above considerations when ensuring sufficient land / premises are available with the correct characteristics rather than identifying industrial areas as a blanket policy. Collaborative planning for waste by the Boroughs should provide flexibility in locational / viability issues, for example, one Borough may have facilities which are mostly suitable for waste transfer operations, where another may have undeveloped industrial plots more suited to larger scale processing facilities.

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Paras 9.8.11 and 9.8.12

SUEZ Recycling and Recovery UK Ltd recognises the benefits of achieving a low carbon outcome. However, most EfW within the UK only generate electricity and struggle to identify a viable and deliverable heat network, which would be necessary to meet a carbon intensity floor as stated.

EfW is a critical component in both sustainable energy supply and waste management. If the London Plan will only seek to deliver the most efficient plant it will be necessary for the GLA to take a leadership approach in masterplanning to site energy recovery facilities near to significant heat users. Otherwise, the policy as drafted may restrict the provision of a key element of proven infrastructure which can assist in achieving the goals of net self-sufficiency and zero avoidable biodegradable and recyclable waste to landfill by 2026.

SUEZ Recycling & Recovery UK Ltd (SUEZ R&R) suggests that an additional bullet point is added to this policy to reflect the Agent of Change principle as outlined at paragraph 9.8.17.

SUEZ R&R propose including the wording from paragraph 9.8.17 within the policy as follows:

1. Developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.

Policy SI9A

SUEZ R&R agrees that it is important to protect recycling and resource recovery / waste management sites and more critically, to ensure that those sites are protected from encroachment which may prejudice their effective and efficient operation. However, there are sites within London which have already been constrained by surrounding land uses and are struggling to operate viably for modern waste management practices.

In order for recycling and resource recovery / 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.

Where sites are already constrained, there should be an opportunity for these to be released if alternative capacity is provided elsewhere within London. To this extent, the GLA needs to take a leadership role in these issues, as Boroughs can take a precautionary stance if their own ability to meet their apportionment is compromised, even where this is of benefit to wider London.

SUEZ R&R has recently been involved in a project where all parties agreed that the release of an existing, constrained waste site was sensible and pragmatic. However, while there was a benefit to London there was a slight negative impact on the releasing Boroughs ability to achieve their apportionment. In this instance if the GLA had been in a position to manually adjust the apportionments to reflect the strategy, or if the Boroughs had been **required** to work together, it is likely that the scheme would have progressed to the satisfaction of all parties and the benefit of Greater London.

SUEZ, therefore, recommends that the GLA needs to take a leadership approach in the release of compromised waste sites where there will be no detrimental impact to the long term future waste management needs of London. This could be undertaken by the GLA updating a 'live' apportionment table to reflect substitutions, or a similar method. Furthermore, SUEZ recommends that the policy is amended as follows:

A. existing waste management sites should be safeguarded, unless the use has already been compromised by surrounding development and alternative capacity is provided elsewhere, to the satisfaction of the GLA

Policy SI9B

SUEZ R&R understands that this policy requires waste uses to be integrated with surrounding, non-waste development. However the current wording and intent is unclear.

Furthermore, in some instances it is sensible for waste uses to be segregated from other non-waste uses. For example, where there is significant noise generation or other amenity impacts.

SUEZ R&R, therefore, recommends that the wording and purpose of this policy is clarified.

Policy SI9B

While SUEZ R&R agrees that ideally it would be pragmatic for the loss of waste sites to be considered through the plan led process, that can often be a long and infrequent process. Provision should be made for circumstances which require consideration out of plan review timescales.

While SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) agrees that ideally it would be pragmatic for the loss of waste sites to be considered through the plan led system, that can often be a long and infrequent process. Provision should be made for circumstances which require consideration out of plan review timescales in order that the flexibility of the market is not frustrated.

SUEZ R&R agrees that three years provides a reasonable timescale to assess the maximum throughput of the site. Requiring the analysis of 5 years of data may result in a skewed figure which takes account of throughput prior to the existence of more recent constraints, changes in the waste market or other issues which have an impact on the viability or throughput of sites.