



MITCHAM SOCIETY

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22/P3620 Mitcham Gasworks Site Western Road Mitcham CR4 3FL

FULL PLANNING APPLICATION FOR THE DEMOLITION OF A PRESSURE REDUCITON [sic] STATION AND TELECOMMUNICATIONS MAST, ERECTION OF NEW BUILDINGS TO PROVIDE RESIDENTIAL ACCOMMODATION (CLASS C3) AND FLEXIBLE COMMERCIAL/COMMUNITY SPACE (CLASS E AND/OR CLASS F2), WITH ASSOCIATED ACCESS, PARKING AND LANDSCAPING ARRANGEMENTS, INCLUDING THE RE-PROVISION OF NEW TELECOMMUNICATIONS MAST N.B - THE APPLICANT'S AMENDED PROPOSALS ARE FOR A SCHEME COMPRISING 579 FLATS IN 6 BLOCKS RANGING BETWEEN 5 AND 9 STOREYS WITH 158 PARKING SPACES, NEW VEHICLE ACCESS FROM WESTERN ROAD AND PORTLAND ROAD AND WITH 287SQ.M OF FLEXIBLE COMMUNITY/COMMERCIAL FLOORSPACE.

Mitcham Society comments

May 2024

Mitcham Society has considered the revisions to this planning application and has the following comments.

1. As we noted in our comments in March 2023, we are entirely supportive of the use of the Gasworks site for housing, and we are also supportive of the inclusion of retail or office space. We go further – we believe that development on this site should include significant community uses. We are fully aware of the need for homes, and most particularly of the need for truly affordable homes. We are acutely aware that the proposal would not only overdevelop this site, but under-provide on truly affordable homes. As we wrote in March 2023 in terms of the potential for removing people from the council housing waiting list - “Any arguments put forward that this proposal will provide “much needed” housing for people on the waiting list are, in our view, misleading.”
2. Density. The developer makes a big play of having reduced the total number of homes in this revised design from 595 to 579. Decreasing the total number of homes by 16 is nothing to be proud of. The site allocation in the Local Plan submitted to the Secretary of State in December 2021 was for 200 – 400 homes, a range which we entirely support. A bizarre toying with numbers and heights then saw around 650 homes, with blocks up to 10 storeys

appear in May, and that same month a Statement of Common Ground between Merton Council and St William was published (discussed and agreed behind closed doors) which also stated that up to 10 storeys was appropriate for the site. The latest version of the Local Plan with modifications, published in January 2024, has the indicative site capacity as 500 - 650 homes. It is impossible to understand such a variance in site capacity, and we can only reiterate what we said in March 2023 about this. No valid public justification has ever been presented which can account for an uplift from 200 - 400 to around 650, a rise which is 225% higher than the lower allocation of 200, and 62.5% higher than the upper allocation of 400. Is it really possible that with all its skills and abilities, Merton Council's own in-house professional team were so very wide of the mark in initially calculating site capacity? If that is the case, what faith can we put in any of their calculations? The only alternative explanation we can think of is that the site allocation has been drawn up by the developer. If that were the case it would make a mockery of the plan-led system. The increased density of this proposal and the requirement for extra height is the root cause of its problems, and without going back to the drawing board and producing an entirely new design and submitting a new planning application, this can not be adequately dealt with.

3. Design quality and its effects. We remain entirely uninspired by the overall design of this scheme. The failing are numerous and permeate the scheme. We will focus on some of the more egregious examples.
 - a. The appearance of this site is pattern-book bland, with no distinctive character, and nothing which says "Mitcham" about it. If given permission, this development would usher in a new era of blandification for Mitcham which could conceivably extend into Mitcham Village itself, where several large developments sites are expected to come forward. We cannot stress strongly enough that what happens on Mitcham Gasworks will set the precedent for what happens elsewhere in Mitcham Village.
 - b. We note that over a fifth of the dwellings are single aspect and in this respect we refer Merton Council to London Plan Policy D6 – developments should "normally avoid the provision of single aspect dwellings" and its own emerging Local Plan Policy D12.3 - "single aspect homes are strongly discouraged". The preponderance of single aspect homes is one of the many features of this development caused by its over-density, cramming nearly 600 homes onto a site which is not suitable for more than 400.
 - c. We note the new Local Plan rules out single aspect flats that require mechanical ventilation to avoid overheating, and yet that is exactly what is proposed here.
 - d. The submitted amended Daylight and Sunlight report says only 88% of rooms will meet daylight illuminance targets (para 7.3.2) and that overhanging balconies "limit the daylight and sunlight potential of the rooms behind and below them" recognising a 'trade-off' between the provision of amenity and slightly lower daylight levels." In our view, the reduction of any individual's access to daylight is a

serious issue, and we contend that yet again the over-density proposed here is a key cause of the problem.

- e. The PRS which it has now been decided can be moved from its original location, is to be housed in an enclosed building that will front onto Western Road and sit in the centre line of the development. It will form one flank of the main entrance to the development: about as unwelcoming a design as it is possible to conceive both for those entering the development and those looking on from Western Road.
- f. Hay Drive open space has yet again been co-opted by the developer to give the impression they are creating open space which, in fact, already exists. An image showing Hay Drive open space but not the fence which exists in real life between it and the development can be found in the revised Design and Access statement, page 35 – below – boundary of development site in bottom image, people using green space of Hay Drive open space in foreground of upper image.

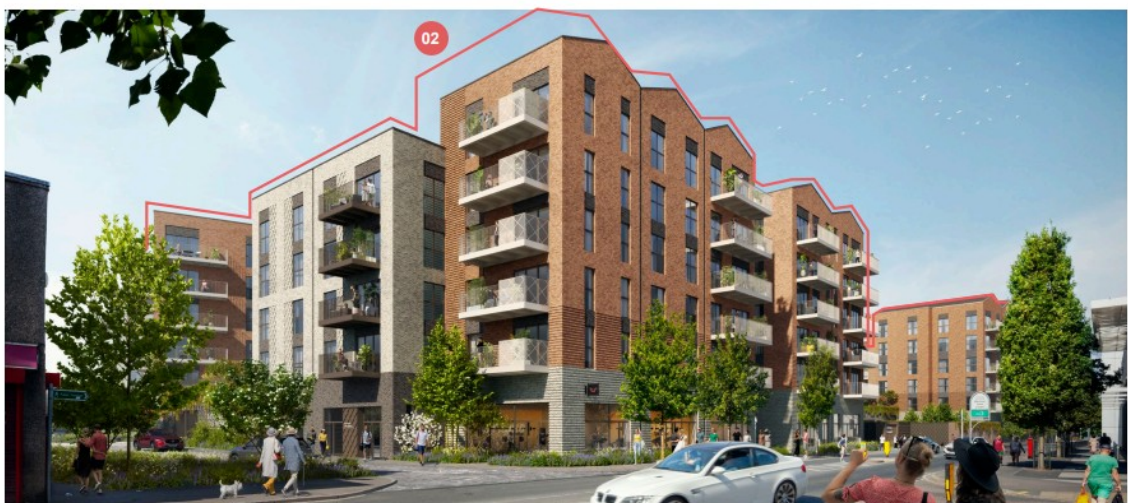


g.

- 4. Urban greening. The London Plan requires an Urban Greening Factor score of 0.4. The applicants say they can attain 0.38. It is simply not acceptable that a new development on a brownfield site could fail to meet a required score on urban greening. The applicant should be tasked with reaching or exceeding the 0.4 score. Many options exist, including reducing hard landscaping, which could include removing some car parking spaces. As with the woeful

failure of the applicant on single aspect dwellings, either clear-cut requirements exist, or they do not. The applicant should be made to go away and return with a compliant scheme.

5. Visual impact. The height and massing of this proposed development has inevitable consequences for design and visual impact which will be significant and harmful. The height and massing modifications made for this latest proposal are minimal. We are still faced with the prospect of four buildings of nine storeys and a lowest height of five storeys, when the immediate surroundings are characterised by low rise, streets based development. The effect on the surrounding townscape would be nothing short of cataclysmic.
6. Visual impact Western Rd / Field Gate Lane. The changes for this new iteration of the plans will do nothing to mitigate the cliff-face appearance of the blocks. For example, the Western Road / Field Gate Lane vertical slab will, according to the Design and Access statement amendment, be a mere 750mm lower in height in this iteration of the plans than it was before. It is still, though, 6 storeys high – and this is 2 storeys too high for the maximum this site can realistically take in this location and have any chance of being sympathetic to the surrounding streetscape.



Amended Design and Access Statement p28

7. Visual impact from Mitcham Village. The developer has decided not to provide a new Townscape and Visual Impact Appraisal – causing us to ask whether they, like us, realise that the effects of their minimal height reductions and changes to the outward appearance of the blocks of flats will be infinitesimally small in visual impact terms. We must therefore rely on the original Townscape and Visual Impact Appraisal for judgement of visual impact from Mitcham Village.

Townscape and Visual Impact Appraisal Part 2
Representative view 9 – view from Mitcham Village Centre



The view is 300 metres from the development site, taken from the far side of Mitcham Village centre. Unsurprisingly, at this generous distance, it is difficult to see the development, and the wide angle used in the photograph plays its part in drawing the eye away.

These two devices are used in several instances in this document to give an impression of minimal effect.

However zooming in to the part of the image that contains the proposed development reveals the true nature of the impact it would have on views across Mitcham Fair Green towards and into Western Road:



8. Visual impact from numerous vantage points. The Townscape and Visual Impact Appraisal presents 21 views illustrating how the proposed development would be visible from different locations. It beggars belief that 16 of these views are considered “beneficial” by the applicant. This is clearly not the case, and in our view by far the more appropriate term is “harmful”. Some examples follow.

Townscape and Visual Impact Appraisal Part 2
Representative view 8 – view from Love Lane looking along Westfield Road



This view is 115 metres from the development site, and even at this distance it is clear that the blocks loom over the cottage style housing in Westfield Road. As you get closer to the site, the looming effect would increase, creating a visual appearance which is depressing and overbearing.

Townscape and Visual Impact Appraisal Part 2 Representative view 7 – view along Western Road



Even using the trickery of distance it is impossible for the developer to hide the massive, incongruous and disjointed appearance of the proposal to anyone approaching it along Western Road when leaving the village centre.

Zoomed into this image, the significant and harmful visual impact is even more apparent:



9. Field Gate Lane. Field Gate Lane is an extremely important historic route, currently a footpath which connects Western Road to Church Road and Cricket Green. It would benefit from attention, but the developer's proposal would undermine its historic significance and destroy any possibility of it having a distinctive character, instead rendering it bland, quotidian and entirely unremarkable. The developer makes much of a "pocket park" to be introduced at the Brickfield Road end of Field Gate Lane. A publicity board used at the public consultation event show children playing in flower-filled greenery. Yet the reality, easily ascertained from another board created for that event, is that this "pocket park" is more postage stamp than counterpane, and would occupy just one fifth of the length of the stretch of Field Gate Lane which falls along the site boundary. The remainder of Field Gate Lane is destined to become edging for a roadway: harsh, unrelenting, and with a view into tall blocks of flats, cars, and, primarily hard landscaping. This is not the fate we want for the historic Field Gate Lane, nor the fate it deserves.
10. Tenure split – shared ownership. The 35% of affordable housing by habitable room is divided into 70% social rent and 30% intermediate shared ownership. The split should be 100% social rent, 0% shared ownership. Shared ownership is increasingly under fire as it is realised this tenure type can lock people in as charges other than on the share being purchased continue to rise, so that staircasing to full ownership is out of reach. It is regressive as it preys on those with aspirations but not the means to get a full mortgage. It has no place in a truly affordable housing scheme, and should be expunged from this development.
11. Tenure split – market vs other. With a 35% by habitable room affordable housing allocation this proposal fails to meet the 40% required by the currently Local Plan policy CS8, and the 50% in the emerging Local Plan policy H11.1. As the new Local Plan gets closer to adoption, its provisions carry ever more weight. Either way, the developer's offer is paltry and far from adequate. We further note that the developer appears to issue a threat to the council in its amended Planning Statement, "this affordable housing offer is contingent on a timely determination of the planning application and without any further change in circumstances." The affordable proportion is not an "offer" but a policy requirement, and for a developer to issue such a thinly veiled threat is shocking. Merton Council has our support for a decision to stand up to thuggery.
12. Lack of family homes. The majority of the homes the developer proposes are one and two bed, with the following split: 39% 1 bed (226), 49% 2 bed (282), 11% 3 bed (65), 1% 4 bed (6). In the new Local Plan Policy H11.3 expects 33% 1 bed, 33% 2 bed, 34% 3 or more beds. The mismatch here is obvious, with families ultimately the likely losers.
13. Fire safety. We are shocked at the comments made by the London Fire Brigade on this planning application (*22P3620_Comments_London Fire Brigade_10.05.2024*). They say that neither stair nor lift provision is adequate, and evacuation arrangements for communal gardens are not sufficient. The issues raised by the London Fire Brigade need to be dealt with as a matter of urgency. Is the applicant prioritising density over safety? Is the London

Fire Brigade's submission yet more evidence that the applicant wants to overdevelop the site?

14. Contamination. We are extremely concerned about potential contamination of the site stemming from its former gasworks use. We are aware of significant issues at other gasworks sites and this, coupled with the fact that the applicant freely admits that there may be contamination present and that the site has not been fully investigated to date, leads us to strongly urge a full survey be done before planning permission is given. We note that uploaded document *22P3620_Comments_Contamination Officer 15.04.2024* contains comments from Merton Council's Environment Protection Officer dated 15 April 2024. The officer makes some serious and significant points on this matter, including requiring a site investigation be conducted to consider the potential for contaminated land, and approved in writing by the planning authority. These issues need to be resolved before a decision on the planning application is made. They cannot be left to planning conditions.
15. Archaeology. We are aware of the discovery of a Roman urn now in the British Museum and the discovery of a Roman well during the construction of a gasholder. This information comes not from the applicant's Heritage Statement, whose main historical concern is gasworks operation, but from the submission of [Merton Historical Society](#) to the original planning application for this site. We are indebted to them for their diligence and include an extract from their submission below. These discoveries make the site deserving of detailed archaeological investigation.

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Merton Historical Society would like to express its concern over the development plans for the Mitcham Gasworks site 22/P3620. The Historic England response to this application is defective as it should have included the known Roman well found there in 1882 during the construction of a gasholder – Historic England Research Records: Monument Number 400543. The well contained a complete Roman urn which is now in the British Museum – Accession Number 1933 4.6.164. The construction type, with wood frame lining still intact and signs of ritual closure including deposition of animal bones, indicated that there might well be a high status roadside Roman settlement in the area.

The written response from both Historic England and GLAAS should also have taken account of the highly qualified archaeologist Dr David Bird's article 'A Roman well in Mitcham' in the *Surrey Archaeological Society Bulletin* 485 (June 2021) pp.9-13: <https://www.surreyarchaeology.org.uk/sites/default/files/SAS%20Bulletin%20486.pdf>

The well is closely paralleled in Southwark, Beddington and Culver and no doubt many other places. As those sites indicate, the settlement associated with the Mitcham well is likely to have been of more than just low status.

The site covers a relatively large area and from its situation is highly likely to have had a variety of uses in the past. It will of course have been disturbed but we have not noticed any reference to activity likely to have resulted in total destruction of any archaeology present and the GLAAS response does not suggest that this is the case. In spite of having been subject to extensive disturbance in modern times the site might still contain some undisturbed archaeological deposits which could be of considerable significance.

16. Borough Character Study. We are aware that Merton Council is citing the Borough Character Study as justification for supporting tower block and flats based development for this site. For example the [Topic Paper](#) on the Gas Works Site drawn up as a submission to the Local Plan inspection, contains this wording:

The Character Study SPD is a borough wide assessment that demonstrates potential growth themes within the borough. Below is the growth theme diagram for Mitcham. It highlights the Gasworks site (circled in blue) as a site that is considered to be 'reimagined' which is defined as having the opportunity for 'more fundamental intervention through the redevelopment of larger sites or centres to be bolder about the level of change, using the prevailing character from surrounding areas to influence re-design.' This is

Source: [LBM19 - Mitcham Gasworks Mi16 Topic Paper - September 2022](#), page 7

We were involved in the 'consultation' around the formulation of the Character Study, and made a formal submission, in which we were very clear that neither Mitcham Village nor its surroundings is appropriate to be 'reimagined' and we continue to hold to this view. It is unacceptable that Merton Council arranges to publish wording in its Character Study in order to justify its support for high rise tower blocks. In doing so it creates an open door for developers, who, as we can see from this particular example, can proceed with no regard to local context.

Below is an extract from our detailed submission.

Re-examine, reimagine and repair

We do not support the location of each neighbourhood on a linear scale of 'Repair', 'Re-examine' and 'Reimagine'.

This is a simplistic approach which can't take account of the diversity and complexity of the defined areas. The definitions provided for each of these three points on the scale are based entirely on development sites and new build, completely failing to define an approach to other aspects of character such as green or blue infrastructure, public realm more generally and access and accessibility (e.g. pedestrian, cycle, public transport, private car). We reject this approach as narrow and confined, and lacking the ability to reflect the subtlety of each neighbourhood.

We also reject the positioning of Mitcham on the scale presented on p39 under 'Reimagine'. It is certainly not an appropriate area for "Fundamental intervention through redevelopment of larger sites or centres to be bolder about the level of change". This level of intervention will only achieve the destruction of the delicacy and human scale of Mitcham.

If this simplistic classification must be used, then Mitcham is better positioned somewhere between 're-examine' and 'repair'. From those two definitions it would benefit from interventions which reflect existing character (re-examine) and reuse existing building fabric and development that is sensitive and context led (repair).

To be clear, Mitcham has vibrancy, diversity and strength. It has a rich history and a culturally rich present. These characteristics should be understood and celebrated, used as the building blocks for what comes next. The danger of seeing Mitcham, Mitcham centre and other Mitcham neighbourhoods which appear at the 'reimagine' end of the scale (Mitcham Bridge, Figges Marsh, Church Road, Pollards Hill, Eastfields, Shannon Corner) as a 'blank

canvas' suitable for a 're-imagine' approach is that their character is lost. This must be avoided.

Source: [Merton Character Study 2021 Mitcham Society Comments](#)

17. There is a clear conflict with the revised Local Plan site allocation for Mitcham Gasworks which states that proposals can only come forward that “reflect local aspirations for the development of the area”. These proposals have been rejected by the local community at every opportunity. The number of objections to this planning application is higher than we have ever seen for any planning application. Every ward councillor that was not obliged to reuse themselves from comment submitted reservations in writing and these can be found at the planning portal. Such a resounding “No” from people who live in Mitcham and represent Mitcham is impossible to ignore.
18. This planning application is subject to multiple problems and issues. For the absence of doubt, we firmly believe that these problems and issues stem from over development of the site. We remain clear that we believe the site could accommodate up to 400 homes (with at least half being truly affordable), including family homes, as well as commercial and community uses, and that the design should: include blocks of no more than 4 storeys, avoid single aspect dwellings, be led by the streets based nature of nearby housing, and be integrated into the surrounding streets rather than completely alien to them.
19. We expect plans for Mitcham Gasworks to be compliant with policy found in the London Plan and Merton’s emerging Local Plan. These policies exist for a reason. They are not a pick-and-mix offer to developers.
20. Merton Council should instruct the developer to think again, and come up with a new design for the Mitcham Gasworks site which is policy compliant, and which complements Mitcham rather than the current bland, anywhere design. We expect to see more emphasis on high quality green spaces, a compliant Urban Greening Factor and treatment of Field Gate Land that is much more appropriate to its historic role and respectful of the fact that it is a rarity in the local area. We expect to see a design which is compliant with the requirements of the London Fire Brigade. We expect to see a design of between 200 – 400 homes.
21. As it stands currently this development has no place in Mitcham, and it should be refused.