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## By Post and Email

8 January 2018

Dear Sir / Madam,

### **London Borough of Merton: Local Plan 2020, First Stage Consultation – Representations submitted by St William Homes LLP**

St William Homes LLP ('St William') is pleased to provide representations in response to the first stage of consultation on the London Borough of Merton ('LB Merton') New Local Plan 2020 ('the New Local Plan').

Established in 2014, St William is a joint venture between the Berkeley Group and National Grid Property ('National Grid'). The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's design expertise and proven track record of delivery to create high-quality residential and mixed use developments.

### **Mitcham Gasworks, Western Road**

#### Site Location and Description

St William have an interest in part of the former Mitcham Gasworks off Western Road ('the site'). The site extends to cover 2.4 hectares (ha) with the land ownership currently being shared by National Grid (1.85 ha) and SGN (0.55 ha).

These representations relate to the area of land owned by National Grid only. It should be noted that these representations are made solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group, National Grid or SGN.

The site is currently vacant having most recently been used as regional offices for National Grid. The site accommodates two electricity sub-stations, an operational gas Pressure Reduction Station (PRS) and above ground gas mains stemming from the historic gasworks use. A large redundant gasholder and telecoms mast are located to the north of the site on the SGN owned land.

The site adjoins the recent Lavender Gardens development and is situated in a predominantly residential area. To the north, beyond Western Road, the Asda supermarket and wholesale retail premises can be found. The existing site access is from Western Road.

The site is subject to a Hazardous Substance Consent (HSC). An application for the continuation of this HSC was granted in 2002 (Ref: 02/P1493). The decommissioning the site and the revocation of the HSC are required to enable the redevelopment of the site.

## Planning Context

The land owned by National Grid and SGN (Site Proposal Ref: 75) is together allocated for *residential-led mixed use development with open space and some community uses (eg: crèche, healthcare)* within the adopted Site and Policies Development Plan Document (July 2014). The allocation sets out a series of planning considerations for any future redevelopment proposals to consider.

A Planning Brief was adopted in June 2005 for the larger Western Road / Miles Road site which includes the former Mitcham Gasworks. This Planning Brief is no longer considered relevant due to a large portion of the site already having been developed and the subsequent adoption of Site and Policies Development Plan Document in July 2014.

However, the Planning Brief did establish that the site represents the largest and most important redevelopment opportunity in Mitcham Urban Village and that it can sustain higher density development.

It is considered that the site has the capacity to make a material contribution to housing need in the area and that delivery on the National Grid owned land can commence within 5 years. As such, St William would welcome the opportunity to discuss the future of this site with you in further detail as the New Local Plan is developed. It is essential that the New Local Plan seeks to optimise development on this site.

## **General Approach**

St William support the rationale behind the New Local Plan and the further clarity it will provide to both applicants and decision makers.

St William have reviewed the questionnaires prepared by the Council and consider that many of the questions posed show ambition and recognition of the challenges that London and LB Merton are facing. In particular, the acknowledgement of the need to ensure consistency with the Draft London Plan 2017 and the need to tackle the housing crisis are welcomed.

Our initial observations are set out herein under the topics of the questionnaires.

## **Mitcham**

The Mitcham topic questionnaire references 'Rediscover Mitcham', a multi-million pound 3 year project, to create an attractive town centre to be proud of. The project comprises a number of public realm and transport proposals aimed at revitalising the Fair Green and surrounding streets.

Mitcham Gasworks is located approximately 250m to the west of the Fair Green and is thus uniquely placed to capitalise on this investment and continue the regeneration of the area.

The questionnaire seeks views on a number of proposals for Mitcham. In particular, St William support the following proposals:

- *Enhancing the public realm through high quality urban design and architecture, and permitting development that makes a positive visual impact to the overall surroundings and connectivity to the town centre; and*
- *Improving the quality and mix of homes including affordable and private housing.*

## Housing Growth and Infrastructure

As the Housing Growth and Infrastructure Questionnaire identifies, the Draft London Plan proposes to increase LB Merton's annual housing target by 200% to 1,328 new homes per annum. The recognition that this will require a radical increase in the number of new homes being built is welcomed.

It is considered that ensuring the effective reuse of brownfield land in accordance with paragraphs 17 and 111 of the National Planning Policy Framework (March 2012) ('NPPF') can play a key role in sustainably delivering the vast number of new homes required in the Borough. The Housing White Paper – Fixing Our Broken Housing Market (February 2017) also seeks to plan for the right homes in the right places, in part by maximising the contribution from brownfield land.

As the 2005 Planning Brief identified, the site represents the largest and most important redevelopment opportunity in the area. As such, the New Local Plan should promote the effective reuse of the site to ensure that this rare opportunity is fully realised.

In addition, within the Draft London Plan the Mayor of London has identified the need to move away from the mechanistic use of density as a planning tool to determine the acceptability of new developments and we would encourage the Council to adopt a similar approach, based on quality of design and accessibility. The New Local Plan should thus fully recognise the contribution that high quality high density development can play in delivering the number of new homes required. In this context, it is essential that the New Local Plan seeks to optimise development on this site.

## Affordable Housing

St William recognise the need to deliver new affordable homes in the Borough and will support the Council's efforts to do so. A key element in this will be maximising the overall number of homes being delivered.

Former Gasworks sites are unique in both use and character and the redevelopment of them can have extremely high abnormal and technical costs. These costs include those associated with remediation and long-term infrastructure requirements. LB Merton should thus adopt a flexible approach with regards to affordable housing and other developer contributions to ensure that landowners are not discouraged from bringing complex brownfield sites forward for redevelopment.

Such an approach will ensure accordance with paragraph 173 of the NPPF which states:

*“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”*

It is also considered that affordable housing policy should also allow for size and tenure mix to be determined on a site-by-site basis having regard to the characteristics and location of the site and proposed development.

St William note that LB Merton intend to publish developers' viability assessments submitted with planning applications. St William support transparency during the planning process however it should be noted that many viability assessments include information which is commercially sensitive. For example, this could include allowances for the acquisition of third party land, tendering contract packages or other

information that would severely compromise the applicant's commercial position. In these instances only suitably redacted versions of the viability assessment should be made public.

## **Diversifying the Housing Market**

As part of the New Local Plan, LB Merton are seeking to meet a range of housing needs and in doing so promote many different parts of the housing market.

One option suggested in the topic questionnaire is to apply minimum space standards for new homes more flexibly to ensure that the finite supply of developable land is used more efficiently. St William consider that this should be explored further as the New Local Plan is progressed and would welcome such forward thinking approaches.

## **Call for Sites**

As part of the New Local Plan a call for sites exercise is being undertaken. A complete call for sites survey in respect of the National Grid owned land is enclosed.

## **Summary**

St William welcomes the opportunity to comment on the London Borough of Merton's approach to bringing forward a New Local Plan 2020 and supports the general direction and intention of their approach.

St William trust that their comments will be duly considered as the New Local Plan is progressed. Should you wish to discuss these comments or require any further information please do not hesitate to contact me

Yours sincerely,



**TOM SIMONS**  
Development Manager