

1.0 Introduction

This study has been produced by Merton Council in response to the Inspectors Stage 2 Matters, Issues and Questions for the Local Plan.

This topic paper aims to consolidate relevant information relating to tall buildings specifically for site allocation Mi16, Mitcham Gasworks.

Please note that the applicant, St William, is currently in the process of creating an application and is currently at the pre-application stages with the council, therefore the pre-application information is sensitive. The council recognise that both the Local Plan and the Mitcham Gasworks time lines overlap meaning that due to the confidential nature of a pre-application, it has been challenging to provide evidence for this site allocation. However, to assist with the topic paper, information regarding the design process of tall buildings on the site have been included. Please see overleaf a time line.

This is the only site within close proximity of Mitcham town centre that is considered appropriate for a building over 21m (circa 6 storeys). This is due to it's large scale and existing contrasting character, as well as the requirement for a taller component needed to retain the telecommunications function on the site. Within close proximity of this site sits Glebe Court and Saddlers Close, both larger residential sites with buildings that are 5-7 storeys in height.



Local Plan and Mitcham Gasworks pre-application time line.

- Local Plan
- Mitcham Gasworks pre-application
- October 2017 January 2018
 Stage 1 Local Plan consultation.
- October 2018 January 2019 Stage 2 Local Plan consultation.
- November 2020 February 2021 Stage 2a Local Plan consultation
- July 2021 September 2021 Stage 3 pre-submission consultation
- 15 September 2021
 First pre-application meeting with applicant.
- 24 November 2021
 Applicant presents at their first Design Review Panel.
- 30 November 2021 Submission of Local Plan
- 27 January 2022
 Public consultation for Mitcham Gasworks
- 14 June 23 June 2022 Stage 1 Public Hearings
- 21 June 2022 Public consultation for Mitcham Gasworks
- 23 June 2022 Applicant presents at their second Design Review Panel.
- 30 August 2022 Applicant presents at their third Design Review Panel.
- 20 September 2022
 Public consultation for Mitcham Gasworks
- 4 October 21 October 2022 Stage 2 Public Hearings

1.1 The Site

The site is located on the edge of Mitcham Town Centre. Framed by Western Road to the east, Portland Road to the north, Hay Drive open space on the west and Field Gate Lane on the south. The context is formed by large retail units, suburban housing and amenity spaces. While the grain of the area is largely defined by residential, the site is situated between public green space and a large Asda store and car park.

Mitcham Gasworks was first constructed in 1849 by James Stevens and Company. Four gasholders are understood to have been present on site across its history, whilst at its peak there were three gasholders and 192 retort houses. During the 1930's around 200 tonnes of coal were burned per day. Gas manufacture ended in 1960 but the gasholders continued to be used for storage of gas for a number of years. Offices were constructed on site in the latter part of the 20th century and were used by British Gas until their demolition in 2006.

The site's historic character was industrial and had a contrasting character to the surrounding residential area and the town centre. Furthermore, it contained larger and taller structures that had visual impacts from long views that characterised this site specifically and created a landmark feature within Mitcham. The two existing structures that characterised this site were:

- a telecommunications mast, circa 65m
- gasholder structure (now demolished) circa 33m



Western Road 1975, Saddlers Close to the right.



Gasworks showing gasholders and office building, 1972



Map of gasworks, 1952



Western Road, telecoms mast - 65m and gasholder frame (now demolished) - 33m

1.2 Site contraints

The applicant has informed the council that the site has significant technical constraints that inform the emerging applications proposed density which results in buildings over 21m. In summary they are:

- the retention and relocation of the telecoms mast requires there to be a taller structure between 2-3 storeys on the site to ensure it continues to function.
- the contaminated land requires remediation before any development work begins
- there are two Pressure Reduction Stations (PRS) on the site that need to be secure. The applicant is in the process of exploring how these can be consolidated into one space only.
- Gas mains require relocation on site to facilitate development.
- unknown historic below ground structures.
- Gasholder demolition

SITE CONSTRAINTS

The site has some significant constraints that must be addressed including underground structures, changes in ground level, and retained gas and communications infrastructure.

The key site constraints are shown in the diagram on the right.

Drawing key:

--- Site boundary (wall)

--- Vodafone cable

Above ground structure (gasholder frame now demolished)

Former gasholder walls and bases (hidden below ground)

Gas mains to be removed

Telecoms mast (to be re-provided within the development)

--- New gas mains

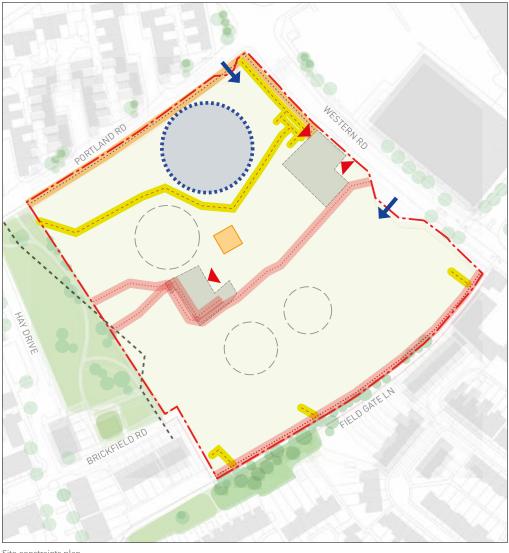
Retained gas mains

Retained gas infrastructure

Access to retained gas infrastructure

Existing vehicular access

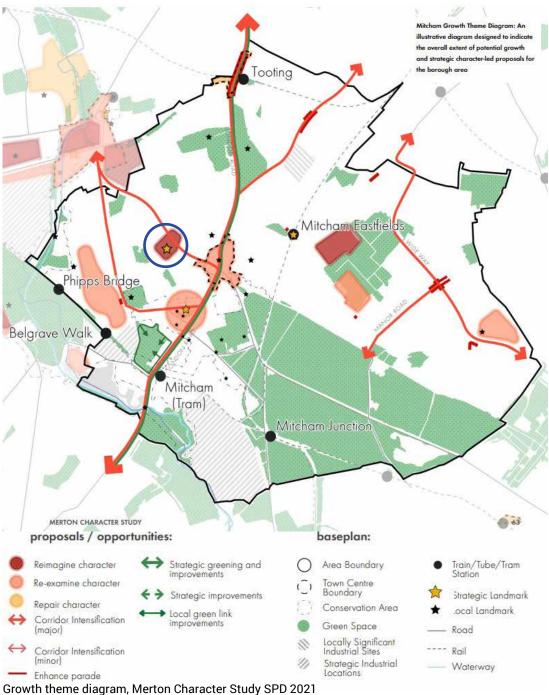
Note that the PRS and gas mains (new or retained) cannot be built over



Site constraints plan

1.3 Principle of high density development

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 due to the sites large scale that can support it's own character, much like it has in the past, but also because surrounding the site is multiple different and contrasting architectural characters. The growth theme diagram also indicates that there is a landmark on the site. The council have made clear throughout the pre-application that a landmark does not mean tall, but it is essential for development on this site to be of the highest quality.



Sensitivity for tall building development.

It is useful to understand the sites suitability and sensitivity for tall buildings as mapped in the Character Study. The sensitivity mapping considers a number of objective criteria that provide a general understanding of the relative sensitivity for tall building development. These criteria relate to whether a site:

- is within or near a Conservation Area
- · includes or is near Heritage at Risk
- is near Listed buildings
- is near Locally listed buildings

The site is circled in blue below. The site is considered least sensitive for tall buildings development (buildings over 21m c. 6 storeys) due to its proximity to heritage assets, therefore any tall development will have limited impact to heritage.

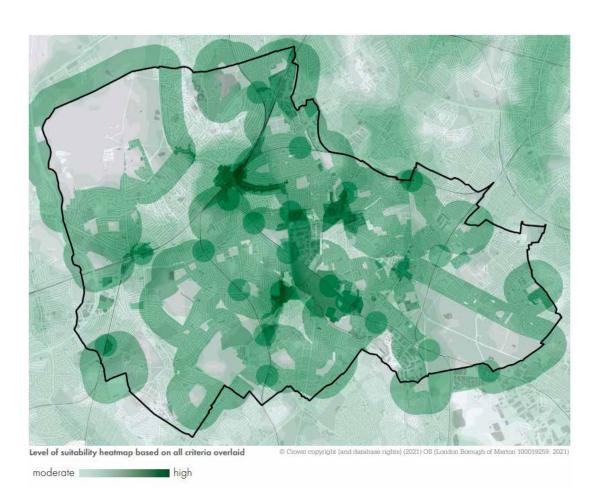


Suitability for tall building development.

The suitability mapping offers a general understanding of the relative suitability of the site (circled in blue). These relate to the sites:

- Proximity to a town or local centre
- · Opportunity or Intensification Areas
- Proximity to a public park
- · Accessibility by bicycle
- Accessibility to public transport
- Strategic area for regeneration

Although the site is not considered to be 'highly' suitable for tall building development due to its PTAL level 3, its proximity to Mitcham Town Centre and the opportunity for growth on the site makes the site suitable for buildings over 21m.



Neighbouring character

The site sits amongst a variety of contrasting architectural styles and character. The site itself historically had its own industrial character and introduced a different scale and language to it's suburban context. Due to the scale of the site, its level of sensitivity and its historic character of its previous use, the site could support a bolder character providing it relates to it's context and there is clear and robust design justification for the proposed character.



south of site. mix of infill, victorian terraces, 1950's houses



east of site. mix of infill



east of site. Saddlers Close estate



east of site. Barratts development



north of site. post war housing



north of site. big box retail and industrial

2.0 Pre-application design process

It is important to understand the design process taken to date and how the scheme has progressed as this work has informed the councils approach to tall buildings on this site.

The council has used the pre-application information as its evidence base for the Local Plan, however this information is confidential. The following pages have been extracted from the pre-application stages of the project to justify the councils policies on tall buildings on site allocation Mi16, Mitcham Gasworks. This is to ensure that the policies are justified and underpinned by robust evidence.

A summary of feedback from officers or the Design Review Panel specific to tall buildings matters has also been included to fully understand the conversation around tall buildings and to understand the robust design exploration taken on tall building matters.

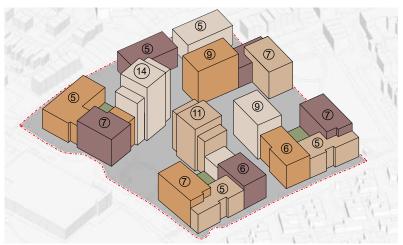
The applicant proposed a scheme ranging from 5 to 14 storeys, placing a cluster of tall buildings of 14, 11 and 9 storeys in the centre of the site stepping down to 5-7 storeys on the edges.

Officers comments:

The council support the site coming forward for a residential led scheme, however the height of the buildings are not appropriate for this site.

The council support the location of tall buildings to be within the centre of the scheme to minimise the proposals visual impact from Western Road.

The massing must be rigorously examined from multiple viewpoints, in and around the development that could be done through VuCity or similar. It has been noted that you need to retain the telecoms equipment that requires being 2/3 storeys taller than its neighbouring buildings. We would like to understand how this is integrated into the overall design and massing approach.









The applicant proposed a scheme ranging from 5 to 13 storeys, placing a cluster of tall buildings of 13, 10 and 9 storeys in the centre of the site stepping down to 5 storeys towards Portland Road and 7-8 storeys on Western Road.

Design Review Panel comments:

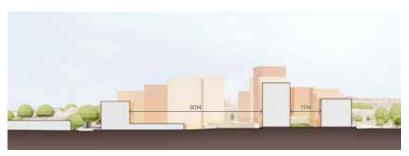
The panel felt that the massing took an urban approach to the site which felt out of character.

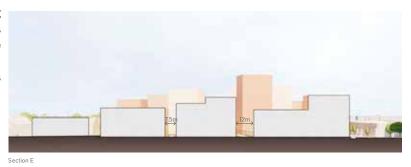
One panel member raised some concerns with the height, that it must be rigorously evaluated and informed by a townscape analysis, in particular from Eagle House which is Grade 1 listed. Other panel members felt that the height was out of character and overbearing and had little evidence to justify it. They had concerns over daylight and sunlight and the quality of homes and open spaces.

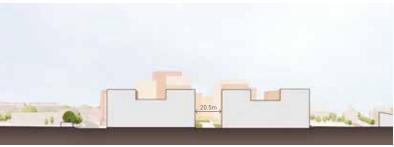
The location of the tall building was questioned as it was described as a landmark building but located in the centre of the scheme and being less visible, therefore it may not be improving the legibility of the town centre.

The panel felt the project was heading the right direction, however more design interrogation was needed to justify the applicants design decisions. The urban approach to the site requires further exploration, as well as testing and demonstrating what height is appropriate for this site.



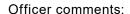






The applicant proposed a scheme ranging from 5 to 13 storeys, placing a cluster of tall buildings of 13, 10 and 9 storeys in the centre of the site stepping down to 5 storeys towards Portland Road and 7-8 storeys on Western Road.

The applicant tested the location of the tall building in 3 locations, in the centre of the site, on the junction of Western Road and Portland Road and on the entrance of the site on Western Road.



The approach to heights should transition comfortably from neighbouring buildings and not compete with Mitcham Town Centre. The applicant tested placing a tall building on Western Road, this is not supported. Proposing the tallest building on Western Road drew emphasis away from the Town Centre to what is a residential area. Height would be best situated in Tallest building location tested on Western Road looking south. the centre of the site where its visual impact is less obvious from short and medium views.

The applicant proposes stepping to 8 stories on Western Road. This may result in an overly dominant frontage that is significantly out of scale and character with its neighbours. This may result in a re-distribution of massing to other locations.

13 stories is inappropriate for the site.

















Tallest building location tested on Western Road looking north.

Pre-application meeting / Design Review Panel / Statement of Common Ground : June 2022

Proposal:

The applicant reduced the height and number of homes and proposed a scheme ranging from 5 to 10 storeys, placing a cluster of tall buildings of 10 and three 9 storey buildings in the centre of the site stepping down to 5 storeys towards Portland Road and 7 storeys on Western Road.

This massing approach was used at the June public consultation event and within the Statement of Common Ground between St William and Merton Council during the Stage 1 hearings for the Local Plan.



Officer and DRP comments:

The reduction of height to a maximum of 10 storeys in the centre of the site and reduction to 7 storeys onto Western Road is an improvement.

Further analysis is required in terms of daylight/ sunlight into the central space and the quality of this space.





The applicant prepared a series of townscape views demonstrating the visual impact of the 10 storey scheme. Views taken from more sensitive locations, such as from within Conservation Areas demonstrate that the building heights have a low impact to the significance of the heritage asset.

Link to Stage 1 Statement of Common Ground

























The applicant re-organised the layout of the development and proposed a scheme ranging from 5 to 10 storeys, placing a cluster of tall buildings of 10 and three 9 storey buildings in the centre of the site stepping down to 5 storeys towards Portland Road and 7 storeys on Western Road. The massing was further developed with more articulation and further reduction of height onto Western Road and Fieldgate Lane corner.

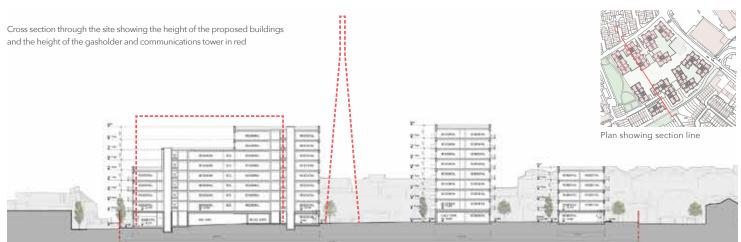
DRP comments:

The panel applauded the applicant for the progress made and stated that it is moving in a good direction.

The massing approach of having taller elements around the central space was supported, however the heights remain a concern with the perimeter buildings feeling overbearing.







Stage 2 Local Plan modifications: September 2022 onwards

Proposal:

After further design review, the applicant has proposed a scheme that has a maximum height of 9 storeys and the telecommunications structure above. This forms the basis of the revised Statement of Common Ground between St William and Merton Council.

3.0 Conclusion

The study demonstrates the design process undertaken to date by the applicant St William. Please note that this is not a submitted application and the applicant is still within the pre-application stages of the project. The extracts presented in this topic paper relate specifically to tall buildings. The application will be evaluated against all design policies to ensure that the development is good quality and of exemplary design and architectural quality as outlined in the tall buildings policies. It is in the council's view that it must be designed and delivered to a high quality for a planning application of this scale to be approved.

It is in the council's view that this brownfield site offers an opportunity to deliver much needed homes in the borough in a sustainable location and can help contribute to Mitcham town centres vitality. This topic paper demonstrates that the tall building approach set out in site allocation Mi16 Mitcham Gasworks is underpinned by robust evidence and justified.

It is evident that the applicant has developed the approach to tall buildings significantly whilst working with the council, the public and responding to the Design Review Panel. The reduction from the tallest building from 14 storeys to 9 storeys is more appropriate for this site, furthermore its location within the centre of the site reduces it's impact on the townscape views.

The applicant's pre-application material and the Borough Character Study SPD support the site to have a bolder architecture and justify how the site could support buildings up to 9 storeys with telecommunications structure above stepping lower around the perimeter of the site. The previous and existing character of the gasworks site has always had its own unique character within Mitcham, and therefore an architecture that reflects this will not be considered inappropriate.