

LB Merton Local Plan Review Examination (Matter 8)

Our ref 65071/01/MS/JHo
Date 21 September 2022
On Behalf of St William LLP

Matter 8 Site Allocations

Issue (ii): Are site-specific aspects of the Plan's allocations justified, effective and consistent with national policy?

(1) Have Topic Papers been prepared for sites

a. CW2

b. Mi1

c. Mi16

and if so, what are the outcomes?

- 1.1 At the time of writing, LB Merton (the "Council") has prepared a draft topic paper which we understand will be used to support the draft Site Allocation Mi16 Mitcham Gasworks ('Mi16' or the 'Site'). Having been shown a draft for the purposes of considering a draft Statement of Common Ground (SoCG), we understand the topic paper will summarise the design process that has been undertaken by St William and the pre-application discussions that have taken place between St William and the Council. It will conclude that the Site can provide much needed new homes and that St William's pre-application material and the Merton Character Study justify buildings up to nine storeys. We have not yet seen the final version of the Topic Paper and understand that this will be submitted alongside Hearing Statements. We therefore reserve the right to comment on this and any other evidence at the Hearing Session on 5 October 2022.

(2) Is there any new specific evidence to justify the presence and maximum heights of tall buildings on the following sites, and do the policies provide an effective basis for decision making in these regards: a. CW2 b. Mi1 c. Mi16?

Introduction

- 1.2 Beyond the emerging Topic Paper referred to above, we are not yet aware of all the additional evidence that has been submitted by the Council and reserve the right to comment (at the hearing) on anything submitted.
- 1.3 However, prior to submission of this Hearing Statement, the Council advised St William that it intended to withdraw the Statement of Common Ground (SoCG) agreed between St William and

the Council on Matter 7 and 13¹ in May 22. The original SoCG (oD13n) is attached at **Appendix 1**; it allowed for taller buildings of up to 10 storeys and presented a capacity for the site of “around 650 new homes”.

- 1.4 At the time of writing (21st September 2022), the Council has now provided St William with a replacement draft SoCG and provided a draft of the Topic Paper that underpins it. The revised draft SoCG states that heights of nine residential storeys will be acceptable at allocation Mi16 and suggested wording for a modified policy gives an indicative capacity of between 500 – 650 homes. In the spirit of partnership working, St William has accepted this revised SoCG. This is notwithstanding St William’s view that the evidence that has been prepared to date by St William and agreed with the Council through the pre-application process did justify the position set out in the previously-agreed SoCG.
- 1.5 In the remainder of our response to this question, we provide the background to the policy approach to tall buildings, the evidence prepared, and the position of the London Plan. We conclude with an explanation for the St William position and how it invites the Inspectors to consider this matter in light of the evidence before the examination.

Background

- 1.6 In the submitted plan, the draft allocation Mi16 made it clear that taller buildings could be accommodated but did not set any maximum height, nor did it specifically reference the Site as being suitable for tall buildings in draft policy D12.6. The GLA policy team advised that this did not fully comply with the London Plan 2021 as it was inconsistent with Policy D9.
- 1.7 Prior to the stage 1 hearing sessions, St William and the Council worked in partnership through pre-application discussions to determine an acceptable height and quantum of homes for the Site. This involved the preparation of evidence in the form of townscape analysis which tested a range of maximum heights. This started with a 14-storey high quality scheme through to a ten-storey scheme².
- 1.8 We have included the townscape visualisations which were presented to the Council as evidence in **Appendix 2**. St William considered that, based on the Council’s Character Study 2021³ and the townscape visualisations, it was the 12-storey scheme that presented the optimum development for the Site. Nonetheless, in the spirit of partnership working and as a result of the pre-application process, St William agreed that a scheme of ten storeys with a capacity of around 650 homes was a reasonable compromise which still allowed the Site to be deliverable when balancing the needs of other policy requirements.
- 1.9 As a consequence, the Council agreed the original SoCG⁴ with St William to agree a maximum height of 10 storeys plus telecoms infrastructure and to increase the indicative new homes to 650 new homes. The Council subsequently proposed a further revision to Policy Mi16 of the submission version of the Local Plan in May 2022 to include the revised changes. These were included in the Council’s Local Plan incorporating proposed modifications dated 20 May 2022⁵.

¹ OD13n Statement of Common Ground agreed between St William and Merton Council on Matter 7 and 13 dated 22 May 2022.

² A chronology for which has been provided in the Council’s draft Topic Paper we have seen and which we expect to be submitted in final form to the examination

³ 12D1

⁴ *ibid*

⁵ LBM05 – Merton’s Local Plan incorporating proposed modifications dated 20 May 2022.

- 1.10 In agreeing the original SoCG, the Council's position was that these Modifications were needed to ensure the policy was in conformity with the London Plan and compliance with the NPPF.
- 1.11 In light of the original SoCG, St William fully supported the Council's approach to policy Mi16 despite considering 10 or more storeys was appropriate, and did not participate in the stage 1 hearings on this or related issues.
- 1.12 In w/c 12th September, the Council stated that it wished to withdraw the original SoCG and then subsequently proposed to amend the SoCG to reduce the maximum height to nine storeys and for an indicative range of new homes of 500–650⁶. Whilst St William continues to believe ten storeys is appropriate and justified through the townscape evidence, in the interests of working positively with the Council and progressing the Local Plan, it accepted the Council's suggested drafts and has signed the SoCG with the indicative range of 500-650 dwellings. St William nevertheless considers the site is capable of accommodating closer to the originally agreed 650 dwellings, and that this is the appropriate scale of development in light of the townscape evidence, and what it provides by way of much needed housing and other benefits. It intends to progress a scheme that reflects this understanding.
- 1.13 In summary, St William is clear that:
- 1 the plan as submitted is not sound and modifications are necessary to address the issue of tall buildings on the site and its capacity. This is common ground;
 - 2 the modifications suggested in the draft SoCG on tall building height would be the absolute minimum necessary to make the plan sound and in conformity with the London Plan and are supported by evidence; and
 - 3 were the Inspectors to conclude that a position in line with the draft SoCG was not sufficient to make the plan sound, particularly in respect of the indicative dwelling capacity, St William would suggest either reverting to the position in the original SoCG (oD13m), or a narrower range closer to 650 dwellings, or the tall buildings policy approach adopted by the Brent Local Plan.

The existing evidence supporting the capacity for tall buildings on Mi16

- 1.14 The Council's evidence supporting the capacity for tall buildings on Mi16 is based on 12D1 which identifies broad locations where tall buildings are suitable. Augmenting this, St William has provided evidence in the form of a series of townscape analysis to demonstrate the height that the Site is able to accommodate. The latest analysis was based on a ten-storey development with a mixture of heights across the Site. Lower blocks were included to address the immediate context of surrounding streets with the tallest block placed centrally to replace the former gasholder structure and act as a strategic landmark.
- 1.15 In turn, this allowed the Council to determine an appropriate maximum height which the Council initially considered (via the original SoCG) to be ten storeys but now considers (in the revised SoCG) to be nine storeys plus the telecommunications mast.
- 1.16 To date, we understand that the technical justification for the revised SoCG continues to be based on the ten-storey development, visualisations for which we have included in this Matter Statement as **Appendix 2**. The townscape analysis includes 12 views agreed by the Council. To assist the Inspectors we have included as **Appendix 3** a technical note summarising the approach adopted for those visualisations and conclusions reached.

⁶ The original suggested range by the Council was 450-650 dwellings

- 1.17 Whilst the analysis does not represent the Council's suggested maximum height of nine storeys, it is clear from the visualisations that a scheme up to ten storeys presents minimal impact. A reduction of one storey, should therefore also be considered acceptable. In terms of context, it is worth remembering that the Site was previously (and relatively recently) occupied by a gasholder at c.30m high.
- 1.18 The townscape analysis confirms that, in terms of the short, medium and long terms views, the proposal would assimilate itself into the townscape and that the stepping down of heights would ensure that the proposal would connect well to the local context. The tallest buildings would help with orientation and act to replace the strategic landmark.
- 1.19 There is therefore evidence for the suitability of tall buildings of at least nine storeys at the Site.
- 1.20 When considering question 2, it is important to also discuss Policy D9 of the London Plan to determine whether the Council has taken the correct steps procedurally to allow tall buildings in this location and is therefore in conformity with the London Plan 2021. We discuss this below.
- London Plan 2021 Policy D9 Tall Buildings
- 1.21 Policy D9 A of the London Plan 2021 states that Development Plans should define what is considered a tall building for specific localities. The Council's amended Local Plan Incorporating Main Modifications (May 2022) clearly sets out what is considered a tall building and would therefore be in conformity with the London Plan 2021.
- 1.22 In terms of Part B, there are three requirements. We discuss these in our response to Matter 4. However, for the purposes of Matter 8 we consider that the Council has now identified the locations where tall buildings are appropriate under policy main modification MM3.1 and has identified these on new maps as required by parts 1) and 2) of Policy D9 part B.
- 1.23 The Council's proposed modifications confirm under draft policy D12.6 that tall buildings are limited to a number of locations, including site allocation Mi16. This approach is effective and is in conformity with the London Plan.
- 1.24 In terms of specific evidence to justify this and the presence and maximum heights of tall buildings in relation to specific sites, Paragraph 3.9.2 of the London Plan 2021 sets out three steps which Boroughs need to undertake to get to this point.
- 1.25 The first step is to undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings can contribute to emerging character and an overall vision. The Council has done this through 12D1 and 12D15⁷ from which it is clear that Site Allocation Mi16 can support tall buildings.
- 1.26 Specifically, 12D1 identifies the Site for 'reimagine character' and a 'strategic landmark' which allow for the highest level of growth and change.
- 1.27 Further, 12D1 highlights the area as having moderate to high suitability for tall buildings within the *Level of suitability heatmap based on all criteria overlaid*¹⁰, on page 139. It also considers the sensitivity heatmap which considers whether a site is within or near heritage assets including listed buildings and conservation areas. This indicates that the site is not within a sensitive location.

⁷ 12D15 Merton Tall Buildings Presentation to GLA 2021.

¹⁰ This heatmap has been prepared taking into account a site's proximity to a town or local centre, opportunity area, public park, station, regeneration opportunity, and its accessibility to public transport

- 1.28 The Site meets the key criteria for a tall building as set out within 12D1, being:
- 1 Close to and within easy walking distance to Mitcham town centre, and an opportunity to improve accessibility to the town centre by opening up routes through the site;
 - 2 Adjacent to existing public open space, with an opportunity to provide new spaces within the site;
 - 3 Accessible by public transport, bicycle and walking, within an opportunity to improve accessibility by providing new routes through the site; and
 - 4 Identified as an area for regeneration.
- 1.29 12D15 shows the evidence, guidance and policy that the Council has considered in determining the broad locations and we consider that this provides a robust and justified approach to determining where tall buildings can be located.
- 1.30 The Council has now also completed steps 2 and 3 of paragraph 3.9.3 by identifying maximum heights for allocations and identifying these on a map. In terms of allocation Mi16, the revised SoCG confirms that nine storeys is appropriate¹¹.
- 1.31 At this stage, the Council is only required to meet Part A and B of Policy D9 of the London Plan 2021 and paragraph 3.9.2. Part C should be considered at the planning application stage. Notwithstanding this, the initial townscape visualisations demonstrate that the visual impact element of Part C has been also been considered and accepted in principle by the Council.
- 1.32 Provided the modifications suggested to draft policy D12.6 and as written in the revised draft SoCG in relation to heights at Mi16 are accepted, the Council's approach would be in general conformity with Policy D9 of the London Plan 2021.
- New evidence and approach
- 1.33 Draft Policy H11.2 Part C confirms that the Council supports the delivery of new homes on large sites where they optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D3 and St William supports it.
- 1.34 The new SoCG is based on nine storeys and an indicative dwelling range of 500-650 units. St William considers the wording in the Council's Local Plan Incorporating Main Modifications (May 2022) would have been effective as it included suitable wording of "up to" and is "*subject to consideration of design policies*". We understand that there was discussion at the first stage of the EIP around the need to include a defined range of homes¹², and this – along with other factors - led the Council to propose a range of 500-650. Whilst we accept the principle of adopting a range and agreed the new SoCG figures in the spirit of cooperation, the reality is that the evidence for the site leads to the conclusion that – assuming good design, heights and massing on buildings below nine storeys - a capacity figure at the top of the range would be justified for the site.
- 1.35 Conversely, were the suggested modified policy to result in a view that the site was best suited to a scheme limited to around 500 units, the evidence indicates this would not be optimising best use of the site, potentially contradicting policy D3 of the London Plan 2021 and paragraphs 119

¹¹ As noted earlier, this is based on evidence in the form of the townscape visualisations showing ten storeys is acceptable in this location.

¹² At a session not attended by St William on the basis of the previously agreed SoCG (oD13m), subsequently withdrawn by the Council

and 125 c) of the NPPF. Towards the bottom end of the range also increases the chance that viability would be compromised.

- 1.36 In concluding on the proposed Modification to the policy, we invite the Inspectors to consider the new SoCG and evidence. If the Inspectors conclude that the evidence supports a narrower range than that in the SoCG, St William would be willing to review the position and agree a revised SoCG to reflect that.
- 1.37 As we have noted in our response to Matter 4, even if an indicative capacity is agreed, the effectiveness of the likely policy wording could be further improved to reflect the impact of more detailed design work at application stage. Policy BD2 of the Brent Local Plan recognises that heights in allocations are based on high level analysis and that further assessment is required at the planning application stage to ensure that they are appropriate in their location. The policy states that taller buildings may be acceptable where the quality or design of development and its impact on character is shown to be acceptable. This approach allows emerging schemes to make the best use of land by following a design-led approach that is able to optimise the capacity of a site. If this approach was applied to Policy Mi16, then this would ensure the policy is effective by testing the true housing capacity of the site against design, character and quality objectives.
- 1.38 The approach would allow some flexibility and for the scheme to be fully scrutinised at the planning application stage, ensuring the proposed scheme is able to optimise the Site and make the best use of the brownfield site in accordance with the London Plan 2021, the NPPF and the Council's own draft housing policy. It would ensure the Council maintains control over the final design and height of a development.
- 1.39 Whilst the position set out in the revised SoCG is not as flexible as the approach of Brent, St William is content to accept an upper limit of nine storeys and a revised range of new homes if that is what is deemed necessary for the Local Plan to be found sound.

Conclusion

- 1.40 St William considers that what is set out in the revised SoCG is the absolute minimum modification necessary to avoid an ineffective and unjustified policy given that the plan as submitted is agreed not to be sound.
- 1.41 Ultimately, whatever is included in the Plan needs to fully optimise best use of the site, in line with policy D3 of the London Plan 2021 and paragraphs 119 and 125 c) of the NPPF.
- 1.42 The Inspectors will need to take a view on whether the evidence base provided by St William and that to be supplied by the Council supports the range identified. In the event the Inspectors conclude that the indicative dwelling capacity in the SoCG is not justified, St William would suggest either that policy be modified to reflect either that set out in the original SoCG (a figure of "around 650" dwellings), or a narrower range (more focused around 650 units), or alternatively a more flexible wording, such as that suggested in the Brent Local Plan.
- 1.43 Via examination, we put these suggestions forward for the Inspectors' consideration to consider which would be the most appropriate way forward to make the plan sound in the event that the position in the SoCG is not supported.

(No Specific response to "Other Site-Specific Questions")

[Total Word Count 2,933]



Appendix 1 – Original SoCG

**Draft Statement of Common Ground between
London Borough of Merton and
St William Homes**

**On draft policies D12.6 and Mi16 of the
Merton Local Plan Review**

Areas of agreement

- Mitcham Gasworks site (Mi16) is suitable for tall buildings and the reference in the draft site allocation Mi16 to the potential for taller buildings is agreed
- The inclusion of Mi16 within draft Policy D12.6 relating to tall buildings is agreed
- The initial townscape evidence demonstrates that heights of up to 10 residential storeys would be acceptable subject to consideration of design policies
- The townscape evidence includes the inclusion of a telecom mast on top of a 10 storey residential building as a replacement of the existing telecoms mast on the Gasworks site (existing height of c.65m). The replacement telecoms mast needs to be located on top of the tallest building in order to provide a clear signal.
- An indicative massing with heights responding to context at the edges and rising to up to 10 storeys would provide c.55,000sqm of floorspace (gross internal area), which gives an indicative capacity of c.650 homes, based on net internal area average of 65 sqm, along with associated spaces such as circulation, plant, and ancillary residential facilities.
- Evidence to support heights of 10 storeys and capacity of c.650 homes is included in the initial townscape assessment included at **Appendix A**

Proposed edits to wording

Mi16 Mitcham Gasworks:

Indicative site capacity: ~~450~~ **Around 650** new homes

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to ~~9~~ **10** storeys, subject to consideration of design policies, **along with a replacement telecoms mast on top of the tallest building**

Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed for London Borough of Merton by:

Name – James McGinley

Job Title – Assistant Director for Sustainable Communities

Signature - 

Date – 20 May 2022

Signed for on behalf of St William Homes by:

Name – Lucy Bird

Job Title – Planning Director

Signature - 

Date – 20 May 2022



Appendix 2 - Initial Townscape Assessment

APPENDIX A | MITCHAM GASWORKS MI16

Indicative massing to help form evidence base for site allocation

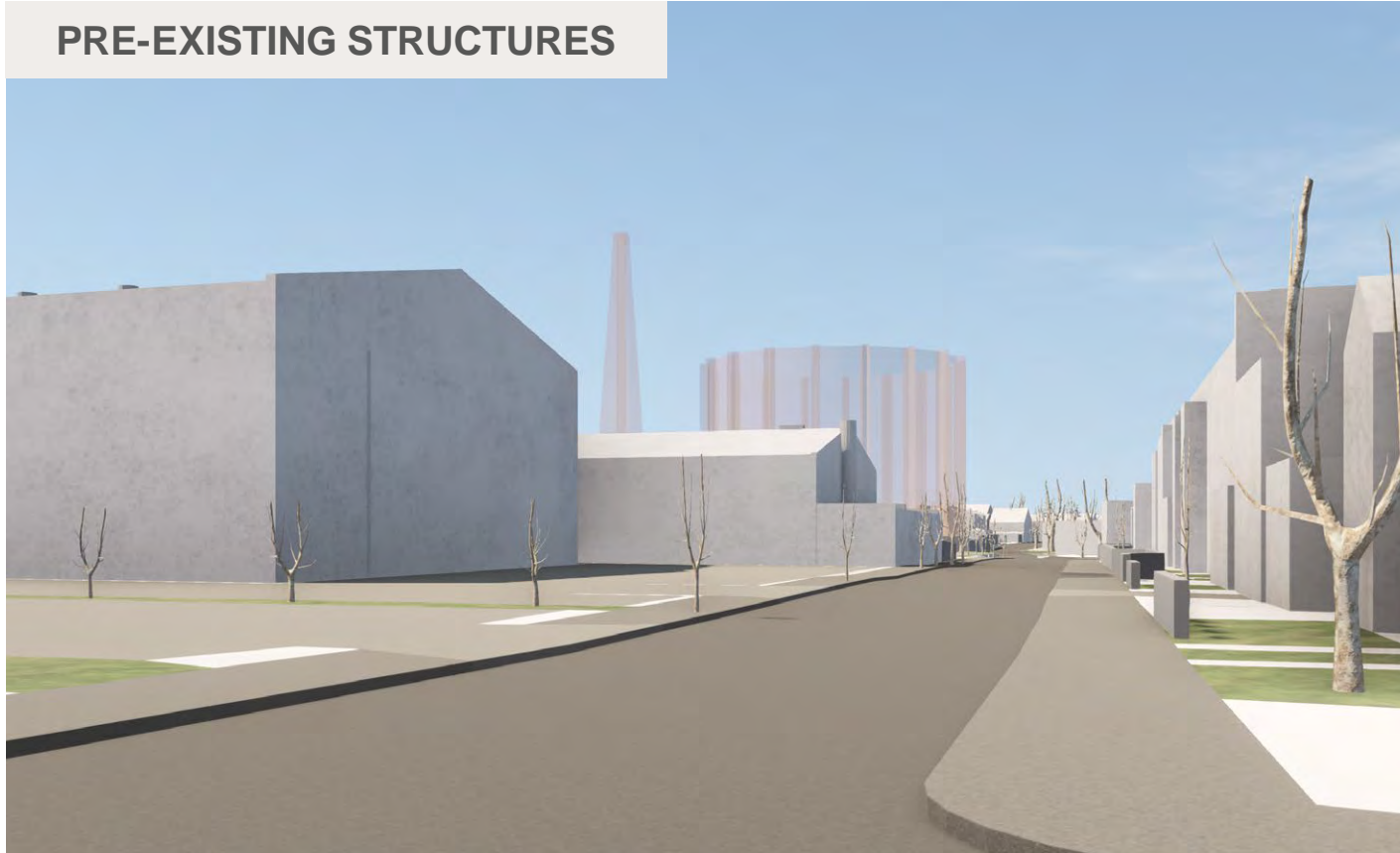
VISUALISATIONS | WESTERN RD (NEAR LAVENDER AVENUE)



VISUALISATIONS | WESTERN RD (NEAR LIBERTY PRIMARY)



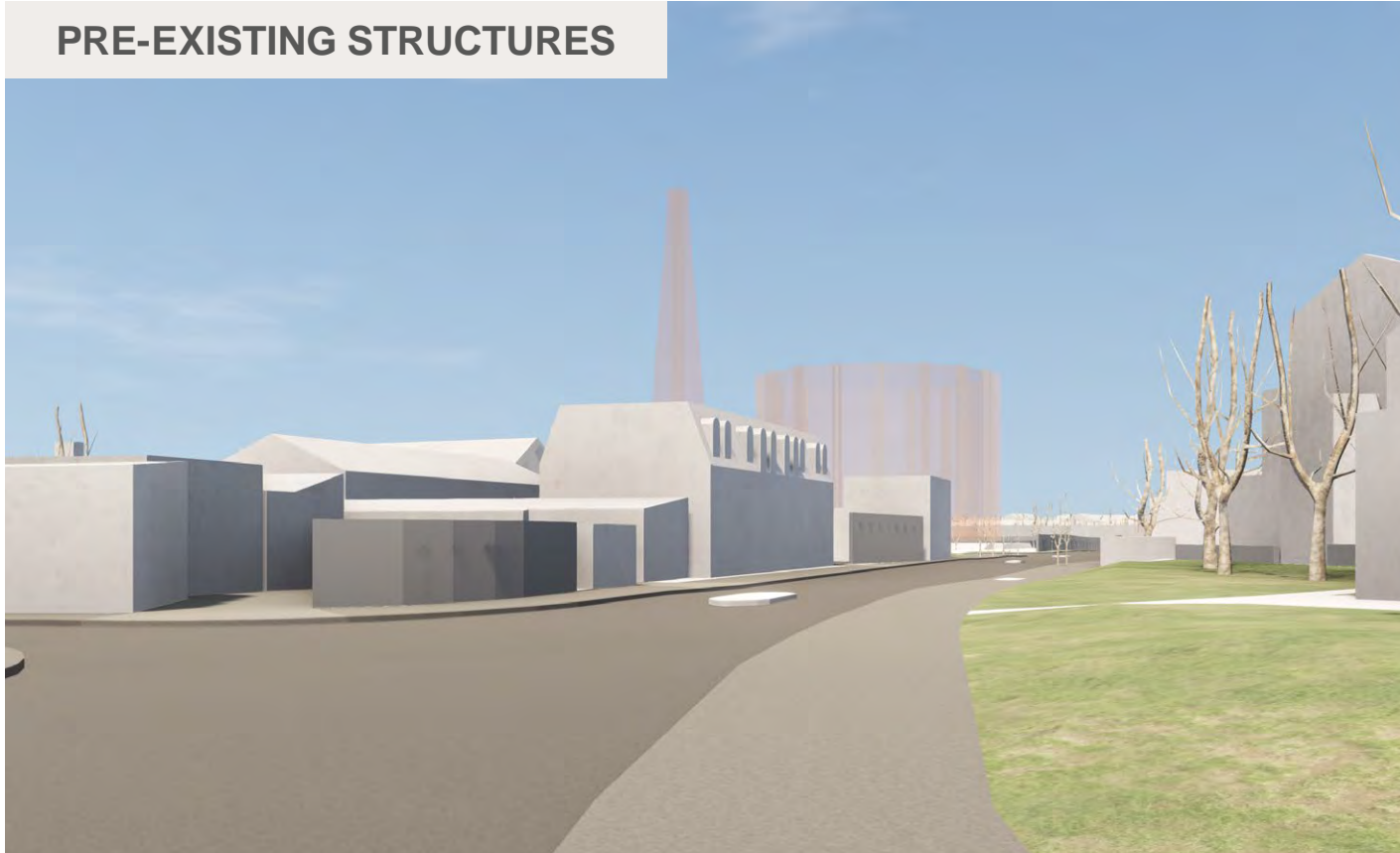
VISUALISATIONS | BOND ROAD (NORTHERN PAVEMENT)



VISUALISATIONS | HOLBORN WAY TAKING IN EAGLE HOUSE



VISUALISATIONS | WESTERN ROAD (EASTERN PAVEMENT)



VISUALISATIONS | UPPER GREEN EAST



VISUALISATIONS | LEWIS ROAD (NORTHERN PAVEMENT)

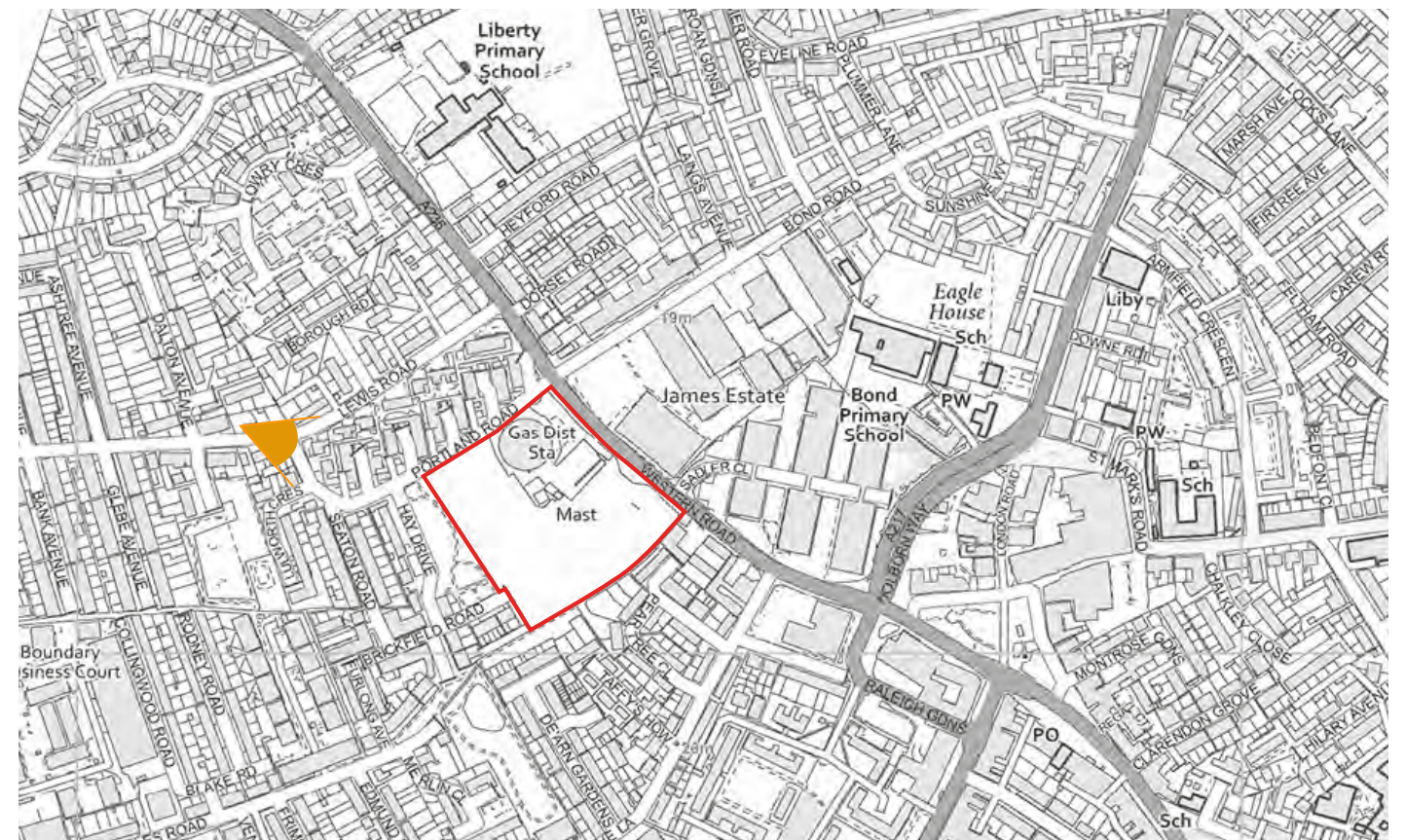
PRE-EXISTING STRUCTURES



EXISTING



INDICATIVE 10 STOREY SCHEME



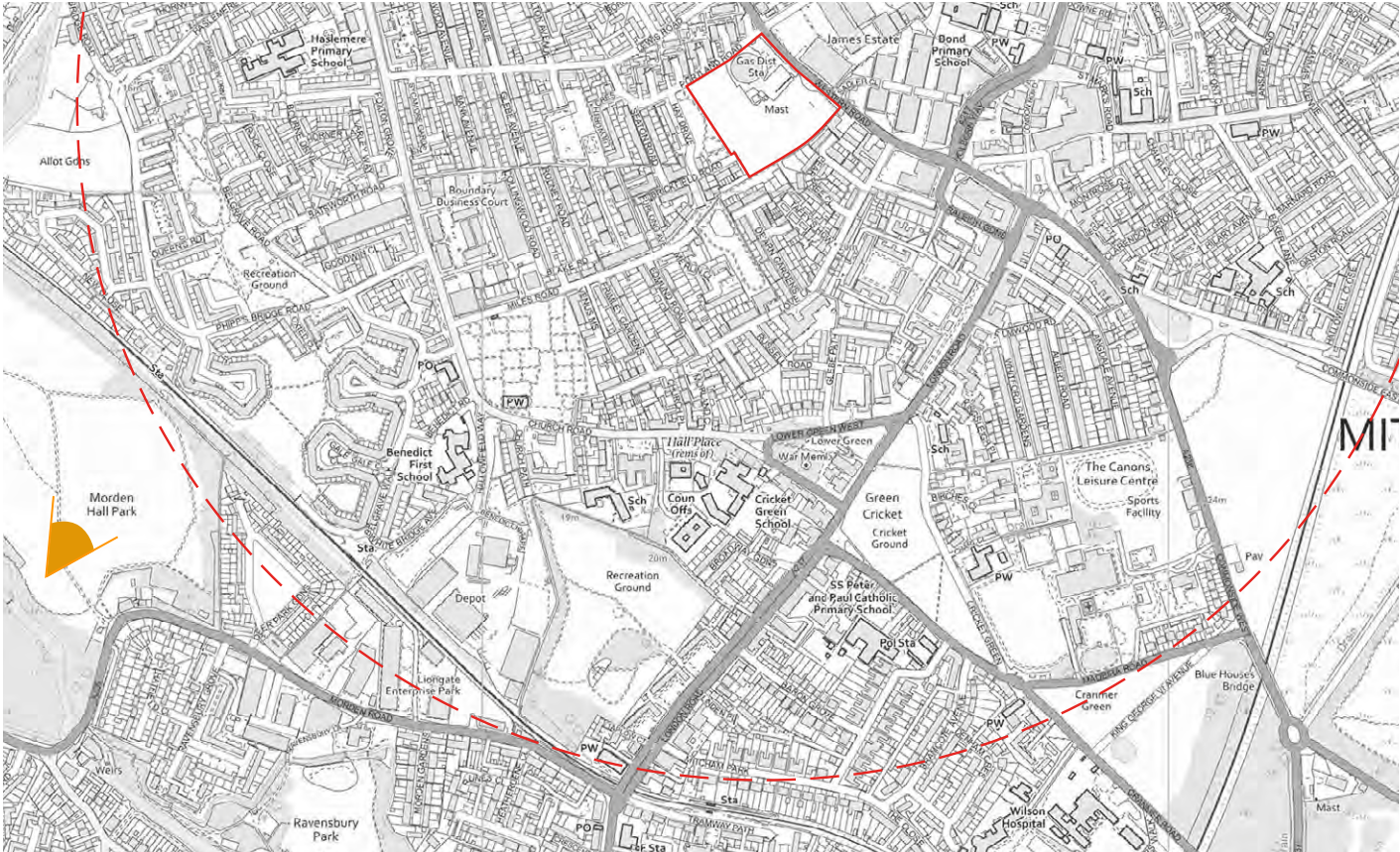
VISUALISATIONS | BRICKFIELD ROAD



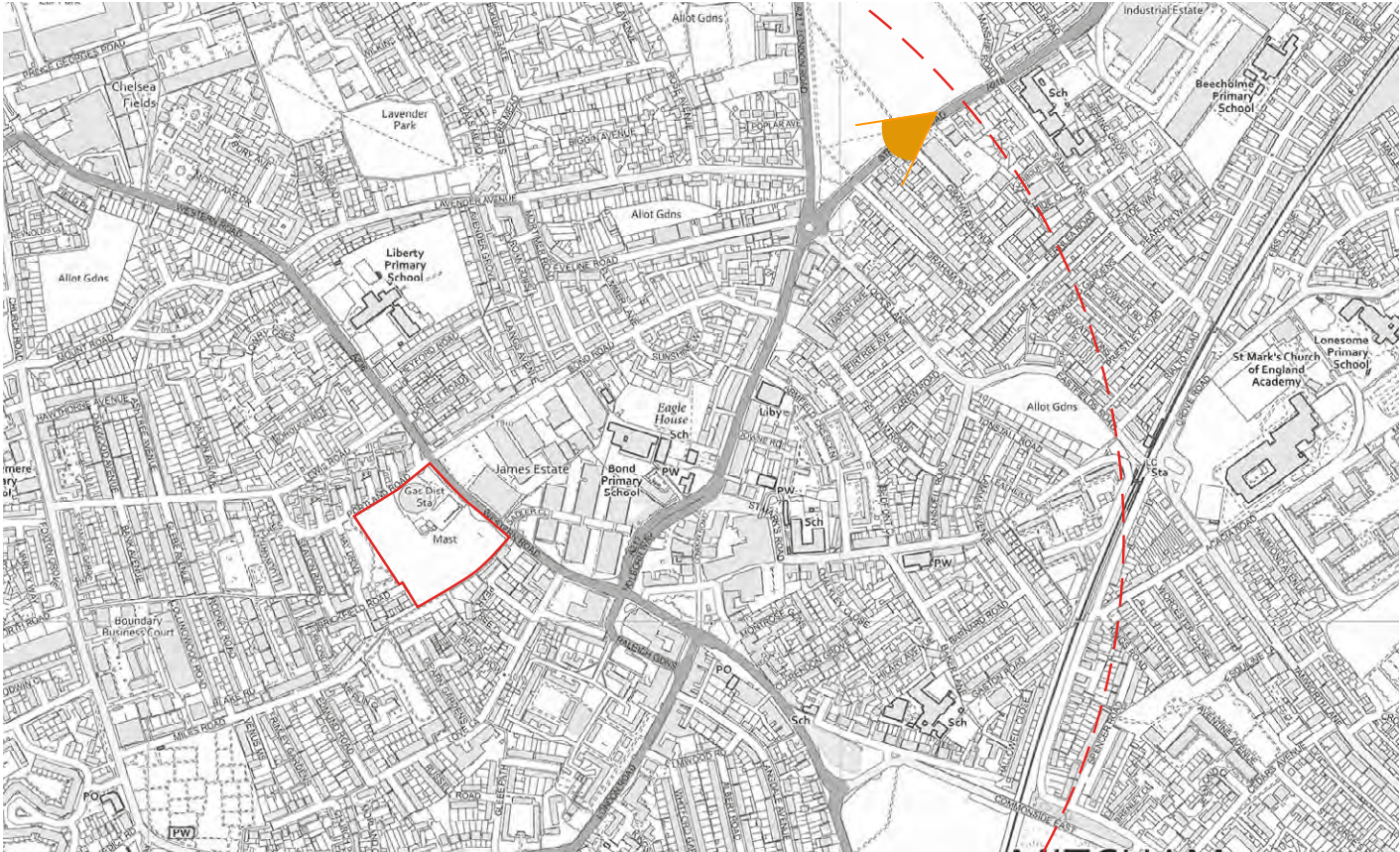
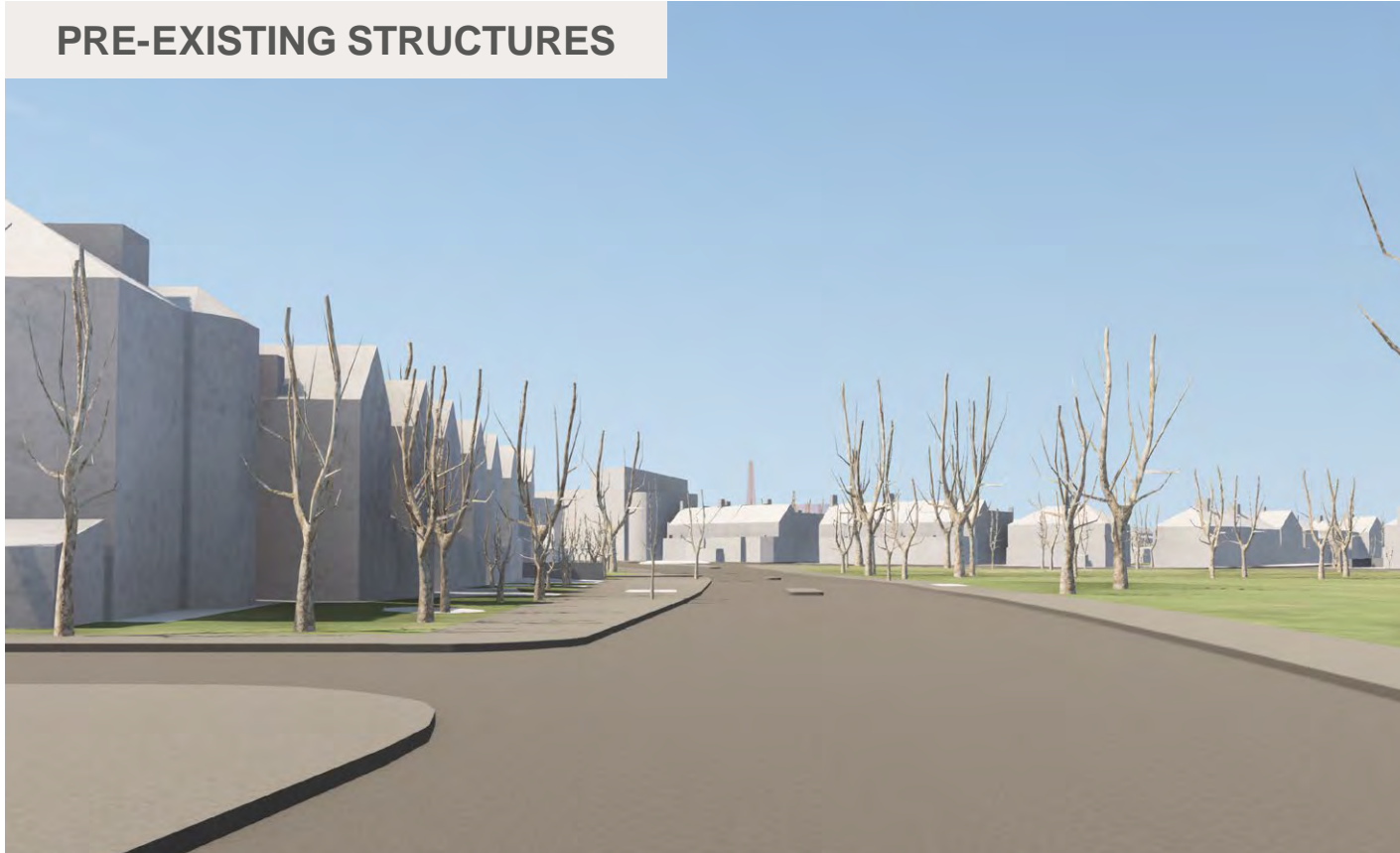
VISUALISATIONS | MITCHAM CRICKET GREEN



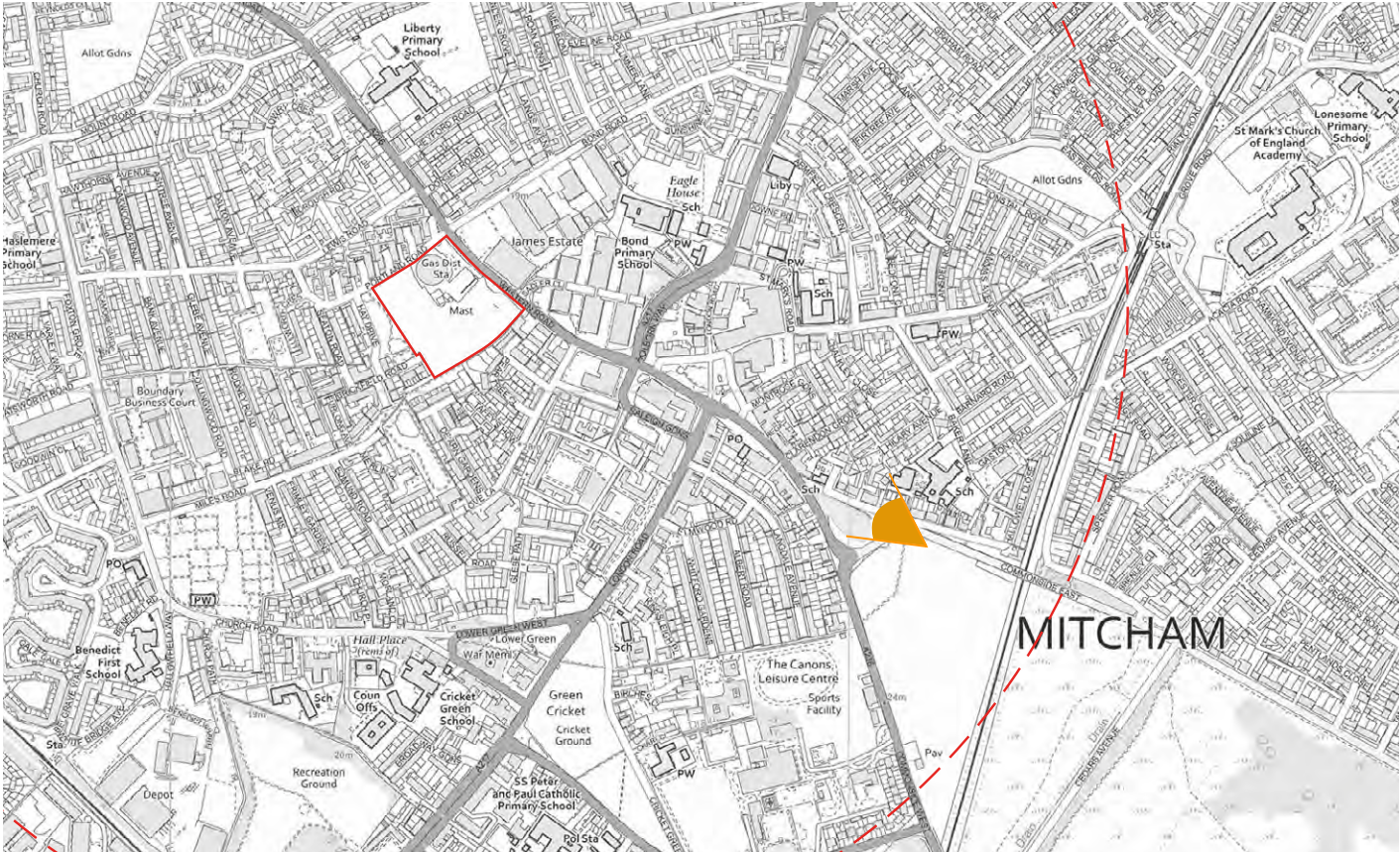
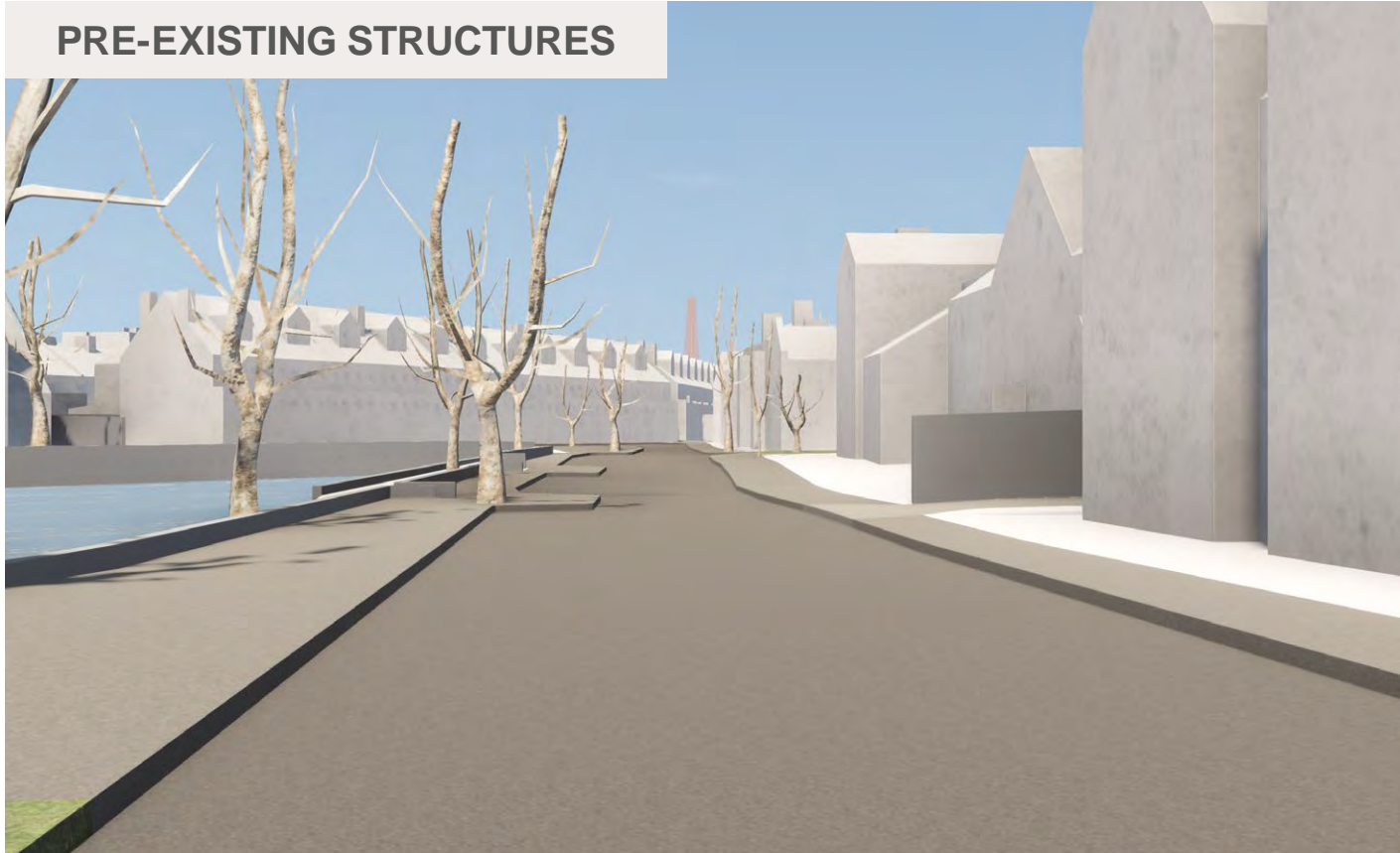
VISUALISATIONS | MORDEN HALL PARK



VISUALISATIONS | FIGGES MARSH



VISUALISATIONS | THREE KINGS POND



**Appendix 3 – Massing review regarding townscape and visual matters
(referring to visualisations in Appendix 2)**

Mitcham Gasworks CR4 3EQ

Client: St William

File Ref: 2124NT09.3

Prepared by: Katy Neaves

Subject: Massing review regarding townscape and visual matters

Introduction

1. This note has been commissioned by St William; it provides a review of the massing of the Mitcham Gasworks Proposal (hereafter referred to as 'the proposal') in regard to the interlinked elements of townscape character, as a resource; and visual amenity, supported by representative views that have been agreed with London Borough of Merton (LBM) Officers and taken from publicly accessible areas.
2. It is based on our desktop and field study analysis of Mitcham Gasworks (hereafter referred to as 'the Site') and its existing townscape context. Consideration has then been given to the likely visibility, which has been established by Ordnance Survey maps, aerial photography and VuCity imagery provided by Rolfe Judd.
3. The Site falls within the administration borough of the local authority of the LBM. Relevant planning policy is identified within the London Plan¹ and LBM's Core Planning Strategy² and Sites and Policies Plan and Policies Map³. Consideration has also been given to LBM's New Local Plan⁴, which has been consulted on and the Examination Hearings that are currently being undertaken at the time of preparing this note.

Site and study area

4. The Site currently includes a mast and had a gasholder structure within it, both create or created a local landmark within the townscape, as shown in the August 2021 photo within **Extract 1**.

Extract 1: Mitcham Gasworks taken in August 2021 before the gasholder structure was demolished



¹ London Plan (2021) Mayor of London

² LBM (2011) Core Planning Strategy

³ LBM (2014) Sites and Policies Plan and Policies Map

⁴ LBM (2021) Reg 19 New Local Plan

5. The Site is accessed from Western Road to the east and not publicly accessible. It is bound to the north and east by brick walls and palisade fencing that fall adjacent to the highways of Portland Road and Western Road respectively. The western boundary of the Site is marked by palisade fencing which divides it from the pocket park associated with Hay Drive and the flank wall of the residential property of no. 13 Brickfield Road. A high concrete panel wall denotes the Site's southern boundary and the public right of way that follows Field Gate Lane.
6. The study area for the Townscape and Visual Impact Appraisal (TVIA), which is being undertaken and will be submitted as part of the planning application for the proposal, includes both Site and its wider context at one kilometre radius from its centre, with further long distant raised views being considered where relevant.
7. The TVIA will describe and assess the effect of the proposal on identified townscape character area receptors and visual receptor's views in accordance with the Guidelines for Landscape and Visual Impact Assessment⁵ (GLVIA3) and An Approach to Landscape Character Assessment⁶. The former states that townscape and visual are two interlinked elements and that the effects of the proposal on both types of receptors should be addressed.

Townscape Character

8. The study area's land use is predominately residential with pockets of light industrial and retail parks to the north-west and south-west. The town centre of Mitcham is located to the south-east and includes retail, office and leisure uses. The study area also includes areas of public open space which range in size and set within the built form public rights of way provide access to the wider movement network.
9. The residential area to the north and west of the Site consists of buildings that are typically two to three storeys in height, whilst to the south and east buildings rise up to seven storeys in height towards the town centre. This mix of building heights reflects the Site's edge of town centre location.
10. To support LBM's New Local Plan Merton Character Study⁷ was produced. This splits the Site and surrounding area into different built character typologies (see **Extract 2**) and a series of distinctive neighbourhoods (**Extract 3**). The Site and majority of the study area fall within the distinct neighbourhood of Mitcham.

Extract 2: Built Character Typologies (page 28 of the Merton Character Study)

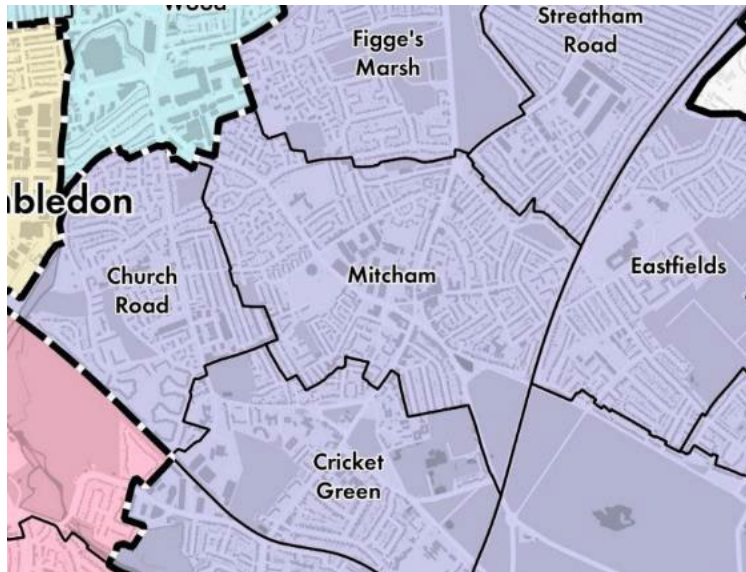


⁵ Guidelines for Landscape and Visual Impact Assessment (2013) Third Edition Landscape Institute and IEMA

⁶ An Approach to Landscape Character Assessment (2014) Natural England

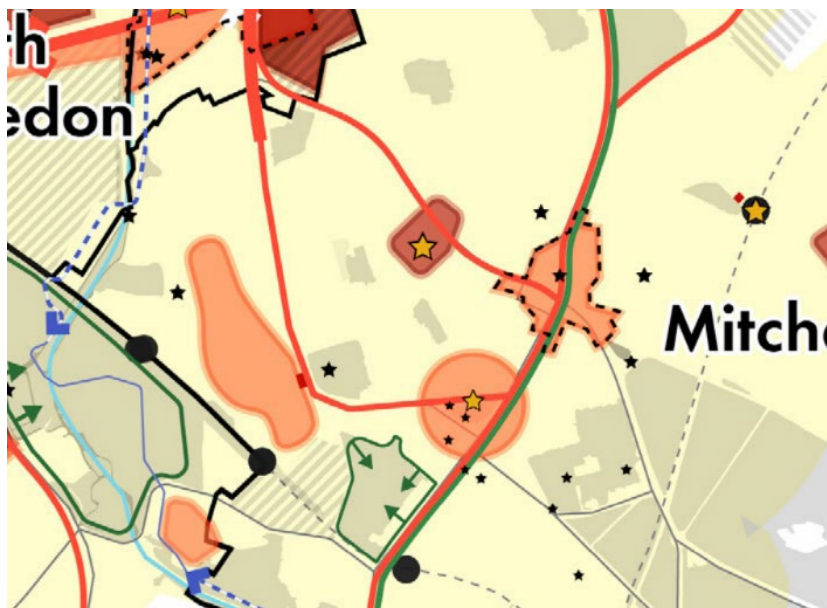
⁷ LBM (2021) Merton Character Study (https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf)

Extract 3: Built Character Typologies (page 28 of the Merton Character Study)



11. There are no designated heritage assets within the Site, and it is not covered by any townscape designations such as conservation areas that would denote value. The Merton Character Study⁸ recognises that the Site and immediate area is not 'sensitive to tall building development' (pages 136 to 137) and recognises that the Site has a moderate to high 'suitability for tall building development' (pages 138 to 138).
12. The Merton Character Study⁹ proposals and opportunities plan and concluding 'Future Merton' section's Borough-wide proposed growth strategy to support the evolution of character plan (see **Extract 3**) highlights the Site as the opportunity to 'Reimagine character' and notes that it holds a strategic landmark (yellow star). It is assumed that the latter relates to the Site's mast and/or former gasholder structure.

Extract 3: Borough-wide proposed growth strategy to support the evolution of character plan (page 145 of the Merton Character Study)



⁸ LBM (2021) Merton Character Study (https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf)

⁹ LBM (2021) Merton Character Study (https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf)

13. The baseline work supports the findings of the Merton Character Study¹⁰, noting that the urban typologies section needs to be checked and updated with the recent Barratt development located to the west of the Site. The TVIA builds on the findings of this study and splits up the established distinct neighbourhood of Mitcham into further sub-character areas relating to; the town centre the edge of the town centre and wider suburbs of Mitcham. The Site falls within the 'edge of the town centre' sub-character area.

Potential effects of the proposal on townscape character

14. The introduction of the proposal will result in changes to the Site and the character of the surrounding townscape.
15. The proposal demonstrates how the layout assimilates itself into the existing townscape, whilst providing a new townscape character that relates to Mitcham's industrial heritage through the following actions:
- Blocks articulated to face and positively address the surrounding streets.
 - Lower blocks addressing the surrounding streets and the treatment of the façade at their base help to ensure that the proposal is integrated with the lower-scale developments immediately to the north and west of the Site.
 - The mid-rise and taller buildings are located in the centre of the Site, away from the existing lower-scale developments.
 - Architectural detailing with the façade of the blocks provides a nod to the Site's former gasholder and the areas industrial heritage.
16. The onsite provision of the two pressure reduction stations, and their positions within the layout, is unfortunate in townscape and visual terms. Appropriate boundary treatments should be considered along with potential improvement to the width of Western Road's western pavement as part of the detail design of the proposal.

Visual amenity

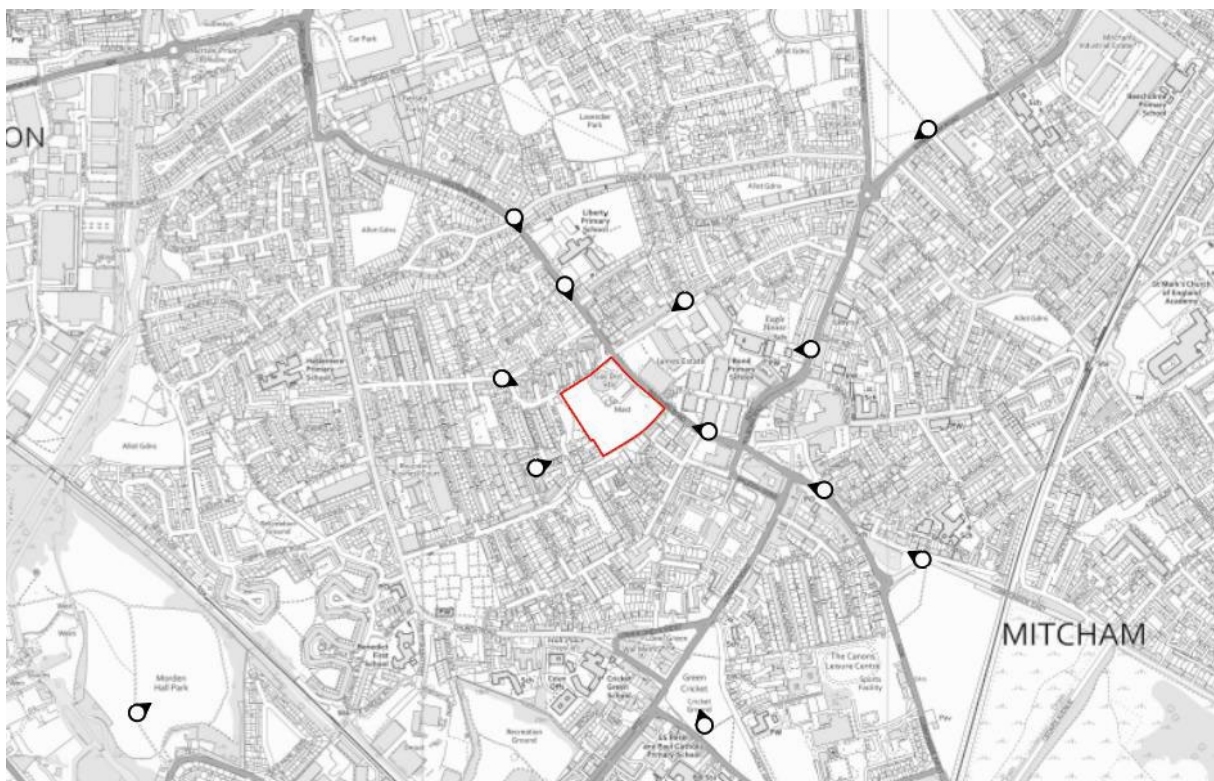
17. Visual receptors are defined as "Individuals and/or defined groups of people who have the potential to be affected by the proposed development" in GLVIA3. The proposed visual receptors have been established through both a desk top analysis of the surrounding area and a field study. The likely visual receptors include:
- Residents in low rise properties located adjacent to the Site and within 300 metres of its boundary, where associated windows are orientated towards the Site;
 - Residents in mid-rise properties located within one kilometre of its boundary, where associated windows are orientated towards the Site;
 - Users of public highways located within one and a half kilometres of the Site; and
 - Users of public open space within 750 metres of the Site and raised areas within 1.5 kilometre to the south-east.
18. The London Plan¹¹ Policy D9 Tall buildings and emerging LBM Policies D12.2 Urban Design and D12.6 Tall buildings state that visual impact should be considered from short, mid and longer views (where applicable). The Site does not fall within a strategic panoramic, linear, river prospect or townscape views identified within the local plan. LBM current and draft planning policies do not establish any local views within planning policy.
19. Prepared to support LBM Core Strategy the Tall Buildings Background Paper establishes views within the borough in the supporting Figure 33. This illustrates and views from Mitcham Common and a vista from Upper Green East look towards the Site, both areas are proposed to be tested in representative views within the TVIA.

¹⁰ LBM (2021) Merton Character Study (https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf)

¹¹ London Plan (2021) Mayor of London

20. Figure 34 shows external strategic views from LB Croydon towards the Site from Little Woodcote Lane, Purley Road Playing Fields and Addington Hills. It is considered that the Site will not be distinguishable from these locations and the viewpoints are not proposed to be tested.
21. The Wandle Vistas Project (2018) identifies Wandle Vista and to inform local planning decisions and urban development. Two vistas fall close to the Site from Mitcham Common and from St Marks Road Car Park. It is noted that neither are orientated to take in the Site but the long distance view from Mitcham Common is proposed to be tested as a representative view within the TVIA.
22. Representative views have been established to test the proposal from short, mid and longer views and have been agreed with LBM Officers as part of the pre-application consultation. A selection of representative views have been included within **Appendix A** and their locations are shown within **Extract 5**.

Extract 5: Mitcham Gasworks representative view plan



Potential effects of the proposal on visual amenity

23. **Table 1** provides a table that summarises the effect of the massing of the proposal within the VU.City model shots set out in **Appendix A**. In summary:

Immediate (Short) views (0 to 300 metres)

24. Immediate views demonstrate how the proposal assimilates itself into the townscape. The stepping down of storey heights to the Site's boundaries ensures that the proposal connects well to the local context and scale of surrounding buildings. Whilst taller the separation between the existing and proposed buildings on the Site's boundaries will provide an acceptable relationship and ensure that the proposal will not be overbearing.
25. The mid-rise blocks and taller building within the centre of the Site have been placed to mark key locations to and through the Site, helping with orientation through the townscape of north Mitcham.
26. The varied use of façade materials will provide a degree of visual separation between the proposal's blocks within the immediate views.

Mid-range views (300 metres to 1 km)

27. The visibility of the proposal within mid-range views varies subject to the position of the viewer. Partial to glimpsed views will be gained from:
- roads or public squares orientated towards the Site, or
 - over large areas of open space
28. Within some of the closer mid-range views the upper floors of the taller and mid-rise buildings along with the mast will be visible. They demonstrate how the proposal steps down in height from the centre of the site. Through setting the taller buildings and mast within the centre of the proposal ensures that it is not over dominant within views and provides some focus and variation in height on the skyline when viewed within mid-range views.
29. The proposal's setbacks and façade treatment will provide articulation and visual interest within the views. The proposed contrast in façade material within the building typologies also helps to separate different elements of the proposal within the views.
30. Intervening built form and vegetation prevent or limit mid-range views from within some of the areas within the townscape.

Long-range views (1km plus)

31. Within the flat landscape of the Wandle Valley, it is considered that long distance views will be prevented to the proposal due to intervening built form and vegetation. This is demonstrated within the view from Morden Hall Park.
32. Where the topography rises, such as Mill Hill within Mitcham Common, limited glimpsed view is likely to be gained to the upper floor of the taller building and mast in the background of the view. Here the proposal's mast replaces the strategic landmarks of the Site's mast and/or former gasholder structure providing a distinctive form which will enhance the skyline and aid with orientation towards Mitcham Town Centre.

Table 1: Summarising the effect of the massing of the proposal within the VU.City model shots

Location	Comment on massing	Distance (metres)	Existing visibility	Sensitivity
Western Road (near Lavender Avenue)	Illustrates mid-distance view from the townscape to the north Upper floors of the taller and mid-rise buildings along with the mast will be visible. View demonstrating the massing stepping down from the centre of the site and how the proposal addresses Western Road.	375	Glimpsed view to mast	Low
Western Road (near Liberty Primary School)	Illustrates short-distance view from the townscape to the north Partial views to taller and mid-rise buildings to the north and east of the site will be visible along with the mast. View demonstrating the massing stepping down from	190	Partial view to mast	Low

Location	Comment on massing	Distance (metres)	Existing visibility	Sensitivity
	the centre of the site and how the proposal addresses Western Road.			
Bond Road (northern pavement)	<p>Illustrates short-distance view from the townscape to the north-east</p> <p>Glimpsed views to the mid/low-rise buildings to the north of the site will be visible. Taller buildings screened by intervening built form. View demonstrating the massing stepping down and how the proposal addresses Portland Road.</p>	205	Partial view to mast and glimpsed view to northern boundary	Low
Holborn Way taking in Eagle House	<p>Illustrates short-distance view from the townscape to the east</p> <p>Very limited glimpsed view to the proposal behind an existing tree.</p>	340	No view	Medium to low
Western Road (eastern pavement)	<p>Illustrates short-distance view from the townscape to the south-east</p> <p>Upper floors of the taller and mid-rise buildings will be visible along with the mast. View demonstrating the massing stepping down from the centre of the site and how the proposal addresses Western Road.</p>	110	Partial view to mast	Low
Upper Green East	<p>Illustrates short-distance view from the townscape to the south-west. Tall Buildings Background Paper Vista</p> <p>Upper floors of the taller and mid-rise buildings along the eastern boundary will be glimpsed along with the mast.</p>	375	Glimpsed view to the mast	Medium to low
Lewis Road	<p>Illustrates short-distance view from the townscape to the north-west</p> <p>Upper floors of the taller and mid-rise buildings along the northern boundary will be glimpsed in the background of the view and sit below the existing roofline of buildings present in the foreground of the view.</p>	130	Partial view to site features	Low

Location	Comment on massing	Distance (metres)	Existing visibility	Sensitivity
Brickfield Road	<p>Illustrates short-distance view from the townscape to the west</p> <p>The proposals buildings lead the eye into the centre of the development and the proposed buildings are perceived as being a similar height to the existing buildings in the foreground of the view.</p>	130	Limited glimpsed view to site features	Low
Mitcham Cricket Green	<p>Illustrates mid-distance view from the Mitcham Cricket Green Conservation Area townscape to the south</p> <p>Trees are considered to screen a view to the proposal from this viewpoint both in the winter and summer.</p>	630	No view	High to medium
Morden Hall Park	<p>Illustrates long-distance view from public open space to the west (Wandle Valley Conservation Area and Registered Park and Garden)</p> <p>Trees are considered to screen a view to the proposal from this viewpoint both in the winter and summer.</p>	1,150	No view	High to medium
Figges Marsh	<p>Illustrates mid-distance view from the north-east.</p> <p>No view would be gained from this viewpoint due to intervening built form.</p>	840	Glimpsed view to mast	Medium to low
Three Kings Pond	<p>Illustrates mid-distance view from the Mitcham Cricket Green Conservation Area townscape to the south-east</p> <p>Upper floors of the mast and taller buildings likely to be glimpsed in the background of the view.</p>	630	Glimpsed view to mast	High to medium