

**From:**  
**To:** [Future Merton](#)  
**Subject:** Mitcham Society comments on Main Modifications to Local Plan  
**Date:** 15 March 2024 09:33:24  
**Attachments:** [Mitcham Society response to consultation March 2024.pdf](#)

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Please find attached our submission on the Planning Inspector's main modifications to the Local Plan.

Our focus is site Mi16.

Thank you,



**MITCHAM SOCIETY**



## **Merton Local Plan public examinations**

### **Submission on Main Modifications**

#### **Site Mi16 Mitcham Gasworks, Western Road Mitcham CR4 3FL**

**March 2024**

1. Mitcham Society notes the modifications proposed by the Planning Inspector on the Site Allocation Mi16 Mitcham Gasworks, resulting in a Site Allocation suggesting the site can accept 500 to 650 homes, in buildings up to 10 storeys in height.
2. It is important to note that the Planning Inspector can only make recommendations. It is for Merton Council to make the final decisions on its Local Plan.
3. We ask you to reject these proposed changes, and support development on Mitcham Gasworks that:
  - a. respects the constraints of the site
  - b. does not exacerbate key problems that have been exposed by a currently live planning application for a less dense proposal with lower building height; and
  - c. reflects the importance of this relatively large development site to Mitcham Village in terms of its relationship to the low-rise, characterful vernacular.
4. While we realise that a site allocation is not a planning application, the currently live planning application for this site, and the involvement of Merton Council with the developer (see below), provides useful context for analysing why the proposed site allocation is inappropriate. The evidence of Merton Council's response to the currently live planning application [22/P3620](#), which is for less than the proposed upper number of dwellings and a lower maximum building height, provides ample confirmation that even this lower, less dense scheme is of unsuitable quality.
5. Planning application 22/P3620, described the proposal as (our bold text):

*FULL PLANNING APPLICATION FOR THE 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 DEMOLITION OF THE EXISTING TELECOMMUNICATIONS MAST AND RE-PROVISION OF NEW TELECOMMUNICATIONS MAST N.B - THE APPLICANT'S PROPOSALS AS CURRENTLY SUBMITTED ARE FOR A SCHEME COMPRISING **595 FLATS IN 6 BLOCKS RANGING BETWEEN 5 AND 9 STOREYS** WITH 135 PARKING SPACES, VEHICLE ACCESS FROM WESTERN ROAD AND PORTLAND ROAD AND WITH 363 SQ.M OF FLEXIBLE COMMUNITY/COMMERCIAL FLOORSPACE.*

6. We have seen correspondence from a planning officer to Mitcham Cricket Green Community & Heritage dated 13 July 2023, relating to 22/P3620 which states the following (below, our italics). The wide-ranging list of issues of concern, and the implication that those mentioned are just the “predominantly” surfacing issues, clearly, and obviously indicates that the proposal is unfit for the site in fundamental, major respects that are material for a planning decision:

*Following a detailed review of the proposal, Officers are not satisfied with, predominantly, the following:*

- *Design*
  - *Parking provision and arrangement*
  - *Highways*
  - *General site layout and operational impact when the development is in full occupation*
  - *Quality of accommodation*
  - *Landscaping/Ecology*
7. We should note that 22/P3620 has been submitted by a well known, national homebuilder, St William (part of Berkeley Group), whose work has involved other constrained sites – including former gasworks. They are not inexperienced, yet they have proved woefully incapable of submitting a proposal that is fit for the site.
8. On the basis of the above response from a planning officer to a proposal at a **lower height** with **fewer homes** than the modified Site Allocation we fail to see how it is possible for a Site Allocation to increase both height and density and produce development which is fit for purpose and capable of meeting Merton Council’s policies.
9. A Statement of Common Ground between Merton Council and St William first published in May 2022 and revised in September 2022, contains no substantive context or justification for a change from 200 – 400 homes to 500 – 650 homes. Is it really possible that Merton Council’s initial calculations were so woefully flawed as to justify doubling the lower limit and almost tripling the upper limit of dwellings. This seems unlikely.
10. There has been considerable variance in different versions of the Local Plan submitted and put out for public consultation. To summarise:

March 2022. The original site allocation of 200-400 homes remains, but development of up to 9 storeys has been added where no height was previously specified. Notably, the phrase in the section “approach to tall buildings” has had the need to take into consideration “existing character, heritage and townscape” removed. (OD4i).

May 2022. The site allocation is modified and now includes the huge jump to “around 650 new homes” while building height jumps to “of up to 10 storeys” (LBM05). Merton Council does not include a range numbers in the homes designation, simply a ball park figure, vaguely described as “around” 650. The publication of a Statement of Common Ground with St William indicates that there was discussion between Merton Council and the developer, but no substance has been released into the public domain that allows us to understand the logic, reasoning or calculations involved in raising the minimum allocation of 200 by 225% and the upper allocation of 400 by 62.5%. Our conclusion is that at this point the site allocation shifted from being plan-led to developer led.

September 2022. Yet another change, as Merton Council again modifies the site allocation, this time including a range of “450-650 new homes” “of up to 9 storeys”. Now the lower allocation of 450 is 125% higher than the original 200, and the higher allocation 62.5% higher than the original allocation of 400. (LBM15).

February 2024. A proposed Main Modification from the Planning Inspector brings yet another rise in proposed density, now with “500-650 new homes” and “an upper limit of around 33m (10 storeys)”. The original lower allocation of 200 homes is now up by 150%, and we are back to 10 storeys (MM62).

11. The only published analysis that we have seen of this site is the Mitcham Gasworks topic paper *LBM19 - Mitcham Gasworks Mi16 Topic Paper - September 2022*. This paper lacks substantive content. It gives a history of the gasworks site. It makes mention of technical constraints “The applicant has informed the council that the site has significant technical constraints that inform the emerging applications [sic] proposed density which results in buildings over 21m.” It is possible to read this as the experienced developer, St William (part of Berkeley Group), coming cap in hand to Merton Council asking for generosity in the site allocation. Is this evidence of developer-led policy making? Later in this Topic Paper the pre-application process with St William is discussed in some detail. Is this further evidence that the Local Plan allocation for this site is developer-led?
12. In a Local Plan, Site Allocations should be mindful of how planning applications that come forward can be designed to comply with policies on areas like single aspect homes, biodiversity standards, access to amenity space, quality of homes, design, density and massing. We have seen from 22/P3620 that even an experienced developer can not meet these policies with a proposal that is less dense than the currently proposed Site Allocation. The original allocation of 200 – 400 homes is fit for purpose in this respect.

13. Planning application 22/P3620 has received hundreds of objections from local people, including a petition signed by more than 660 people.
14. A door to door survey of residents living within 100m of the site (295 people) conducted by local people found 99% rejected plans then in place for a development rising to 10 storeys. The report of that survey is appended to this paper.
15. All councillors in Figges Marsh, Lavender Fields and Cricket Green wards who were at the time not prohibited from commenting by their role on DPAC or as Mayor made representations on 22/P3620. Many of the comments made point out issues which exist as a function of the attempt to overdevelop the site. They could be readily mitigated by a less greedy development, based on the original allocation of 200 – 400 homes.

*Figges Marsh ward, representation from Cllr Natasha Irons, representing herself and Cllr Agatha Akyigyina (Cllr Aidan Mundy - Chair of DPAC)*

“.....welcome the opportunity for this brownfield site to be developed and to see good quality homes for our community..... However, we have a number of concerns that we feel must be addressed for this scheme to be a success.”

“current proposals fall short on the allocation of affordable housing”

“disappointed that this scheme does not include ANY low-rise family houses”

“concerned that so many of the units in the tower blocks are proposed to be single-aspect”

“we believe the current proposals are too dense”

“the site will be packed in with very little natural light and will do little to improve the visual amenity of the area.”

*Lavender Fields ward representation from Cllr Billy Christie representing himself and Cllr Edith Macauley, Cllr Slawek Szczepanski*

“No low-rise family homes, and too many single-aspect homes. We support the council’s ambition to deliver a diverse mix of housing types. We are therefore disappointed that the development includes only multistorey blocks and no family houses. We are also concerned that so many of the units in the tower blocks are proposed to be single-aspect, and urge the developer to consider re-designing the scheme to significantly reduce the number of single-aspect units.”

“Access to green space. We believe that there is not enough green space included in the current proposal, and urge the developer to seek creative ways of increasing the amount of green space within the development, to contribute to a proper amenity for future residents.”

Cricket Green ward representation from Cllr Usaama Kaweesa representing himself (Cllr Michael Butcher- on DPAC, Cllr Gill Manly - Mayor)

“With such a large development, and being mindful of the importance of green spaces for the mental health of residents, I would urge the developer to seek creative ways of increasing the amount of green space within the development grounds.”

16. This brown field site, on the gateway to Mitcham Village, is appropriate for the new housing development. We support development of between 200 – 400 homes, including family homes.
17. It is imperative the Site Allocation in the Local Plan is set within parameters which allow the Plan’s policies to be met. These include, but are not limited to, policies on amenity space, single aspect dwellings, design quality and biodiversity. The density proposed by the Planning Inspector does not provide a Site Allocation for Mitcham Gasworks which is fit for purpose. We have seen that even a less dense proposal from an experienced developer has produced a submitted planning application which planning officers say fails in many key respects.
18. The proposed modifications of building height and site density to site Mi16 should be rejected, and the site allocation should revert to the original indicative site capacity of 200 – 400 homes. In addition the Site Allocation should be clear building height should not exceed 6 storeys.

# MITCHAM GASWORKS – STREET AUDIT

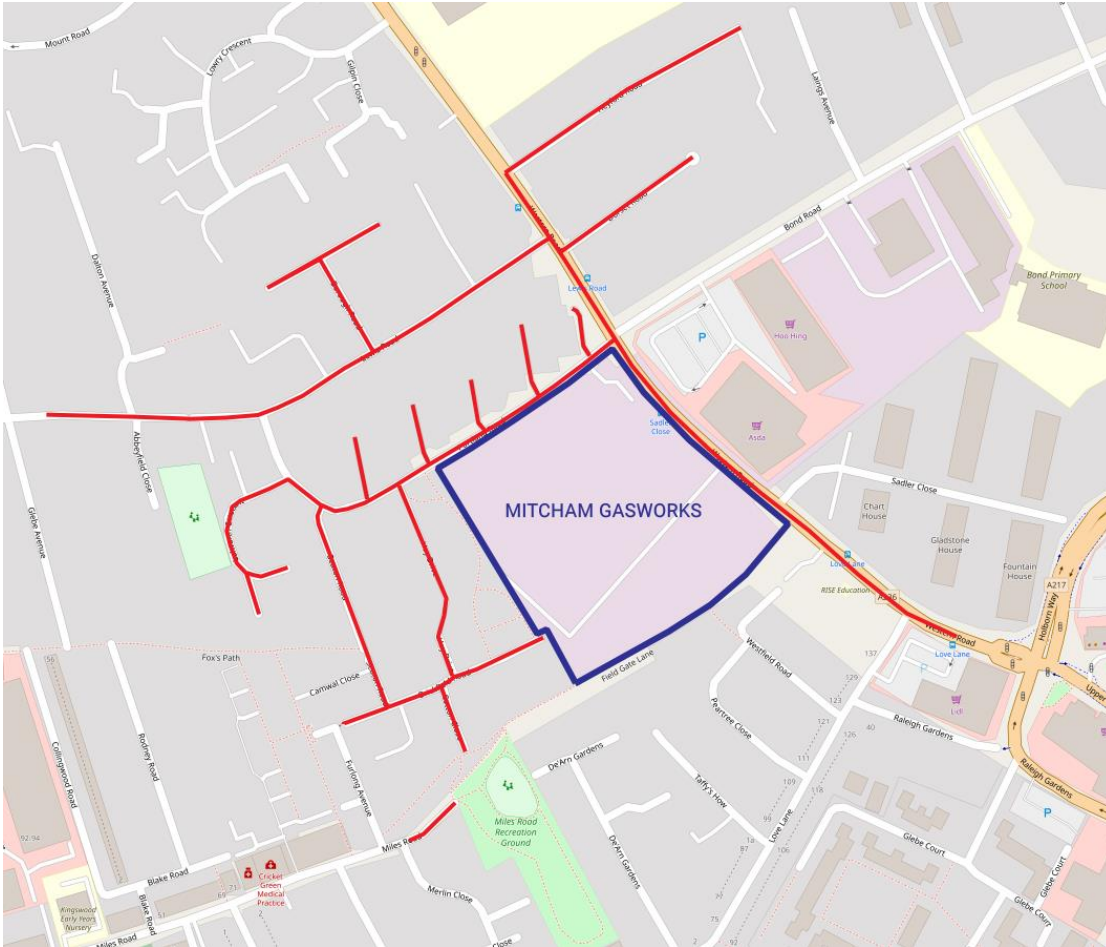
**99% residents living with 100m of Mitcham Gasworks reject plans for 10 storey tower blocks**

A door-to-door Street Audit of residents living within 100m of Mitcham Gasworks has 99% signing up to say they are “*extremely concerned*” by plans for 10 storey tower blocks on the site.

295 people living in 173 homes near to Mitcham Gasworks have signed a letter to Merton councillors expressing concerns at the current plans put forward by housebuilders. Only 3 people from 2 properties did not sign and none of the people visited supported the plans.

Local residents “*support the development of the site in a sensitive manner, consistent with the local area*” and are asking Merton Council to change its Local Plan to require a different approach. This would allow up to 400 homes rising to a maximum of six storeys.

The Street Audit was conducted on the roads marked red on the map. The letter and full street-by-street results of the Street Audit are available [here](#).



This Street Audit was undertaken by local residents campaigning for sensitive redevelopment of Mitcham Gasworks to provide truly affordable homes and jobs in a development sympathetic to the character of Mitcham Village. Contact us to get involved:

