

[REDACTED]

From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 21 March 2023 12:32
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Report for 2023/0107 Mitcham Gasworks Site
Attachments: GLA 0107 Mitcham Gasworks Stage 1 report.pdf; GLA 0107 Mitcham Gasworks Stage 1 letter.pdf

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Hi [REDACTED]
We have now received the Stage 1 report for Mitcham Gasworks. Many thanks for this. On immediate follow up query – Paragraph 65 states a technical memo on energy has been provided to the applicant. We haven't received this yet. Please can you send over?

Many thanks

[REDACTED]
[REDACTED]
Planning Director



[REDACTED]
[REDACTED]
WSP House, 70 Chancery Lane, London, WC2A 1AF
www.wsp.com/en-GB/campaigns/planning-consultancy

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From: Greater London Authority <planningsupport@london.gov.uk>

Sent: 21 March 2023 10:01

To: [REDACTED] <[REDACTED]@wsp.com>

Subject: Report for 2023/0107 Mitcham Gasworks Site

Dear All

Please find attached the decision letter and report relating to 2023/0107, Mitcham Gasworks Site in Merton.

Regards

[REDACTED]
[REDACTED]

Planning Support

Greater London Authority

planningsupport@london.gov.uk

[Attachments published at <https://planapps.london.gov.uk/planningapps/22-P3620>]

[REDACTED]

From: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Sent: 01 March 2023 17:32
To: [REDACTED]
Subject: Mitcham Gasworks Summary Presentation
Attachments: Mitcham Gasworks Summary Presentation 28.02.23.pdf

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[REDACTED]

Thanks for your time yesterday.
Presentation from yesterday's meeting attached.
Please let me know if you need anything else or if we can assist with any clarifications.
As mentioned, we're more than happy to meet with yourself or colleagues again to discuss any items of the application and to assist with the Stage 1.

Kind regards,

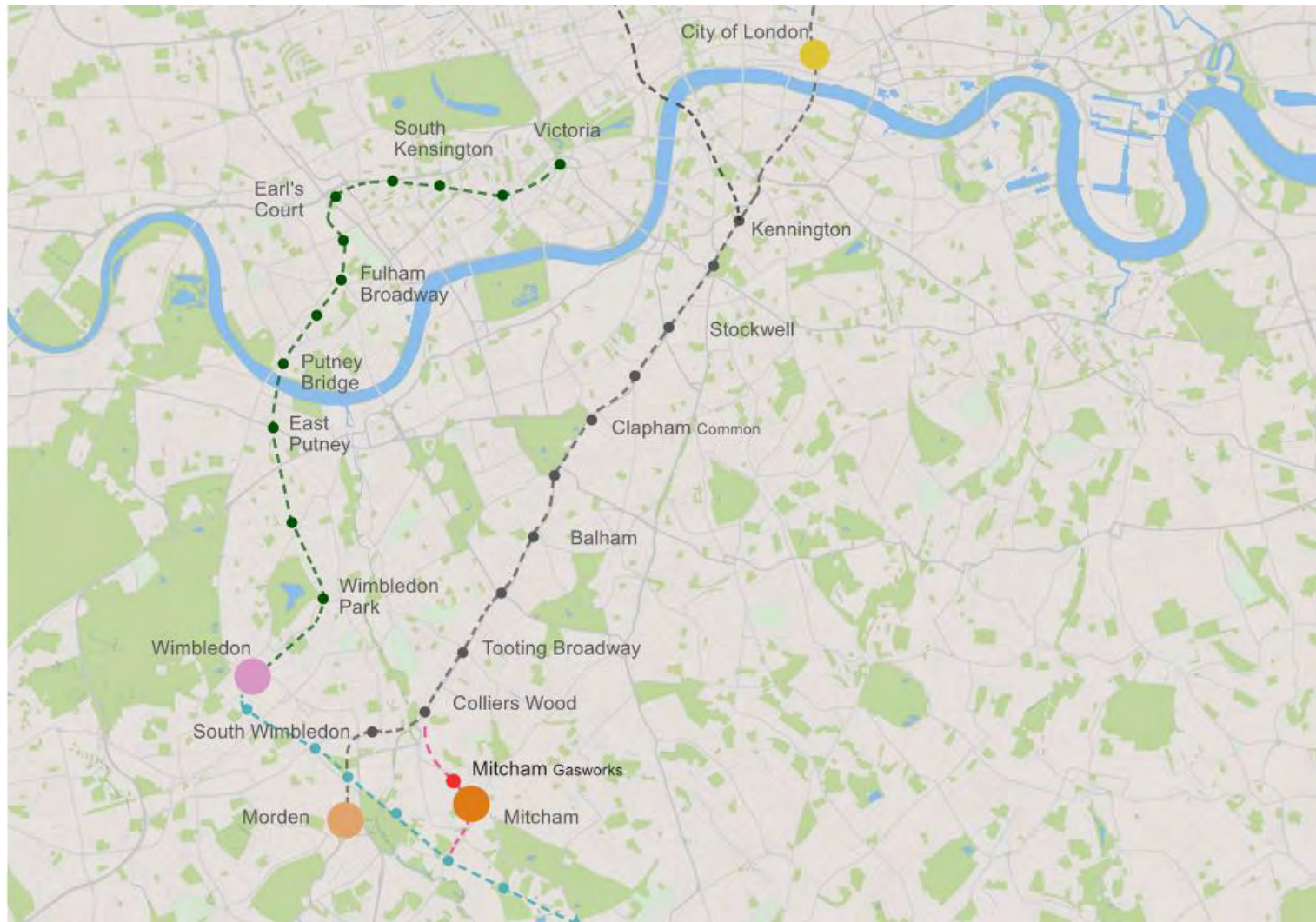
[REDACTED]
Senior Development Manager
Berkeley Ventures

MITCHAM GASWORKS



Site Location & Description

LOCATION



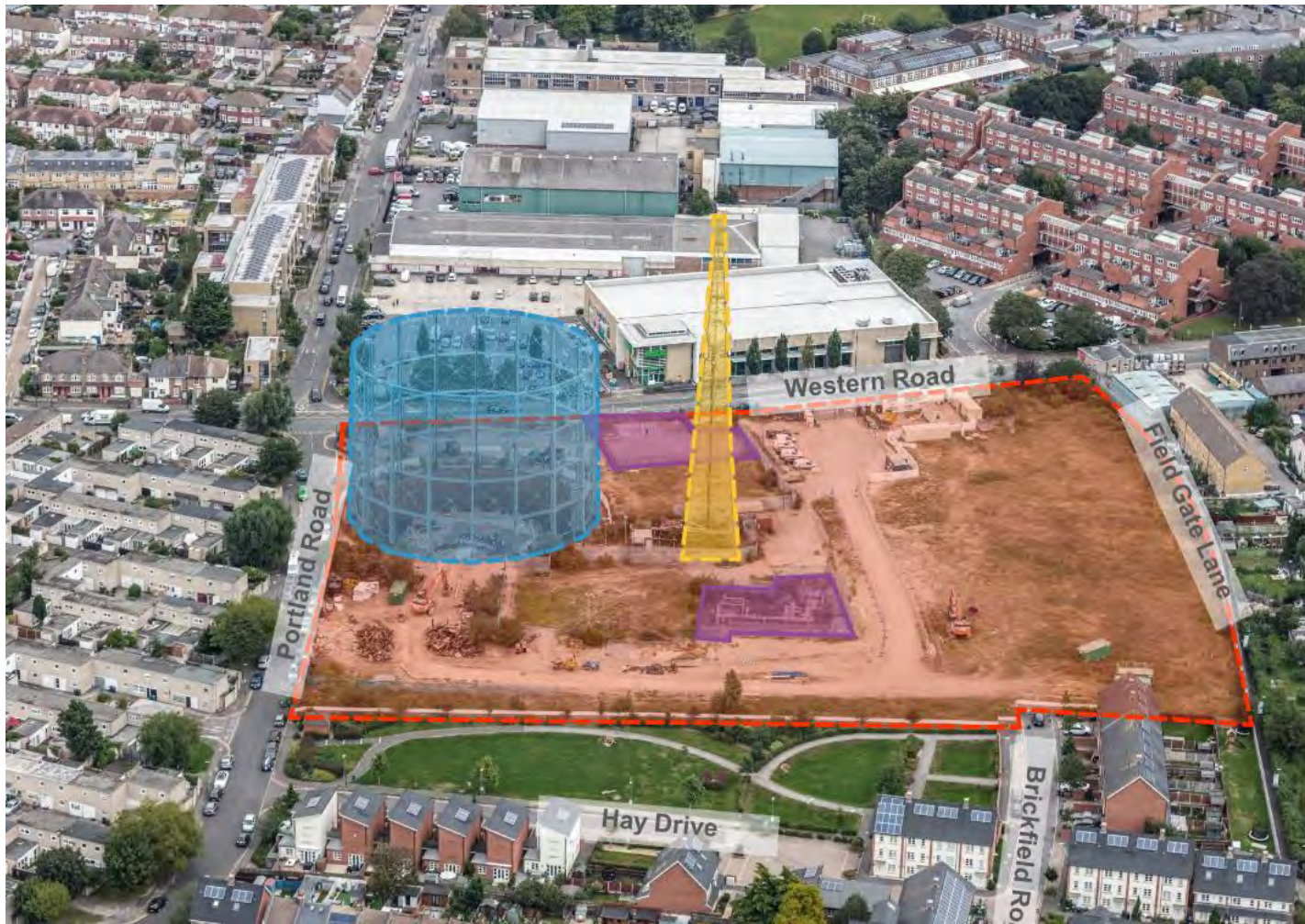
LOCATION



LOCATION



THE SITE



Site boundary



Gasholder



Telecoms



PRS



THE SITE BOUNDARIES



SITE HISTORY

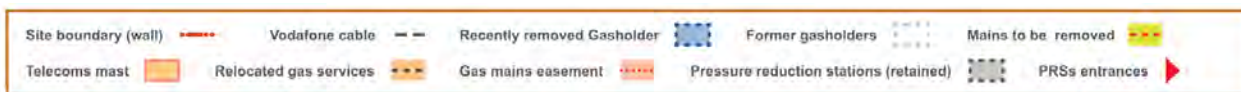
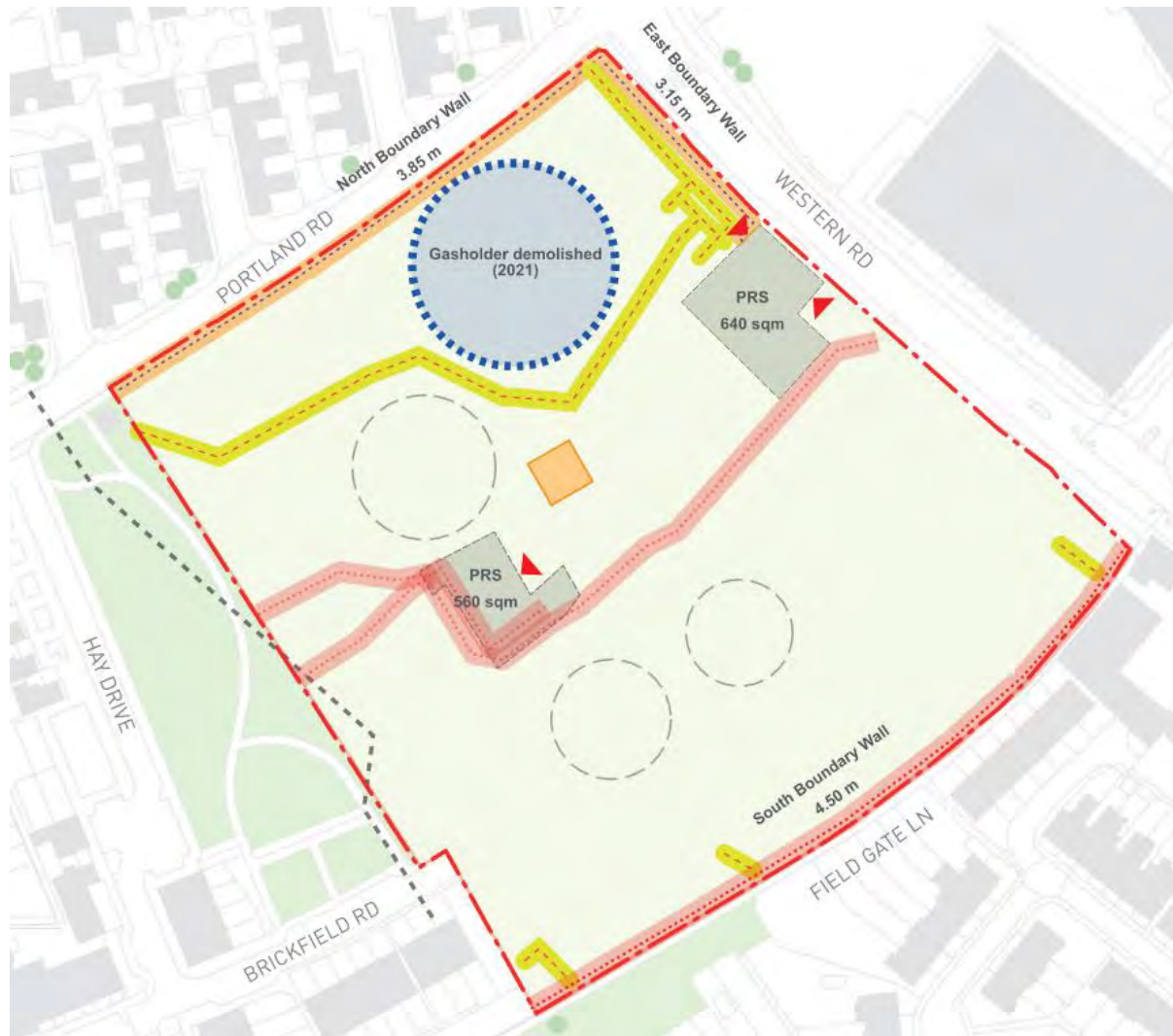


- Closed off from the public for over 150 years
- Used for gas production and storage
- Gas production ended in 1960
- Final largest gasholder remained until 2021



- 1 Site plan 1952
- 2 Aerial view 1937
- 3 Portland Road 1970
- 4 Western Road 1960
- 5 Southern end of Western Road 1975
- 6 James' Estate 1975

CONSTRAINTS

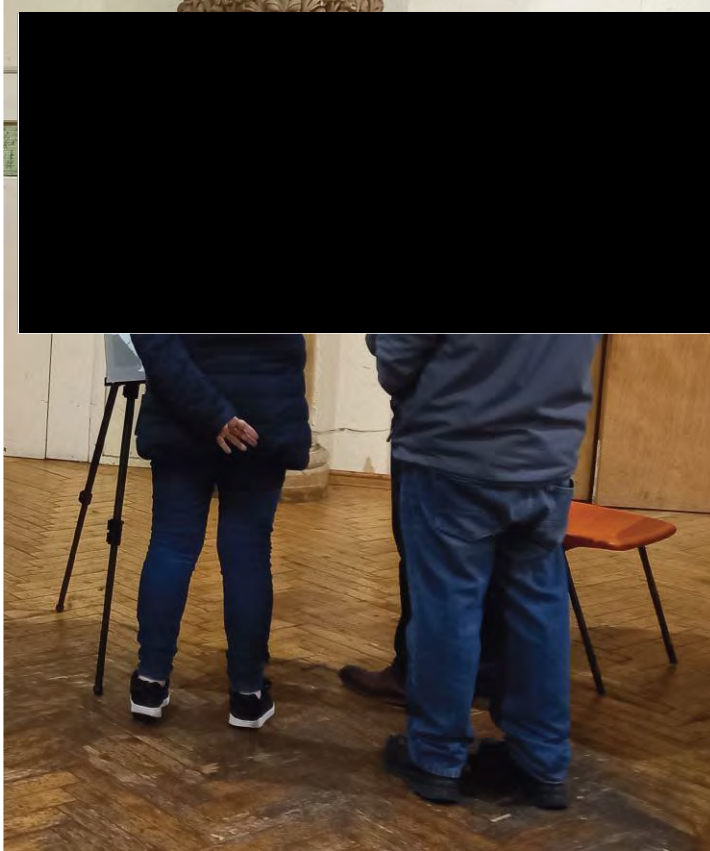


Planning

PLANNING POLICY

- Allocated in adopted and emerging planning policy for residential led, mixed-use development with open space and community use
- Local Plan undergoing examination
- The Council proposes to allocate the site for **500 - 650 homes**, including **heights up to 9 storeys** and with a **replacement telecoms mast on top of the tallest building**

STAKEHOLDER ENGAGEMENT & DESIGN CHANGES

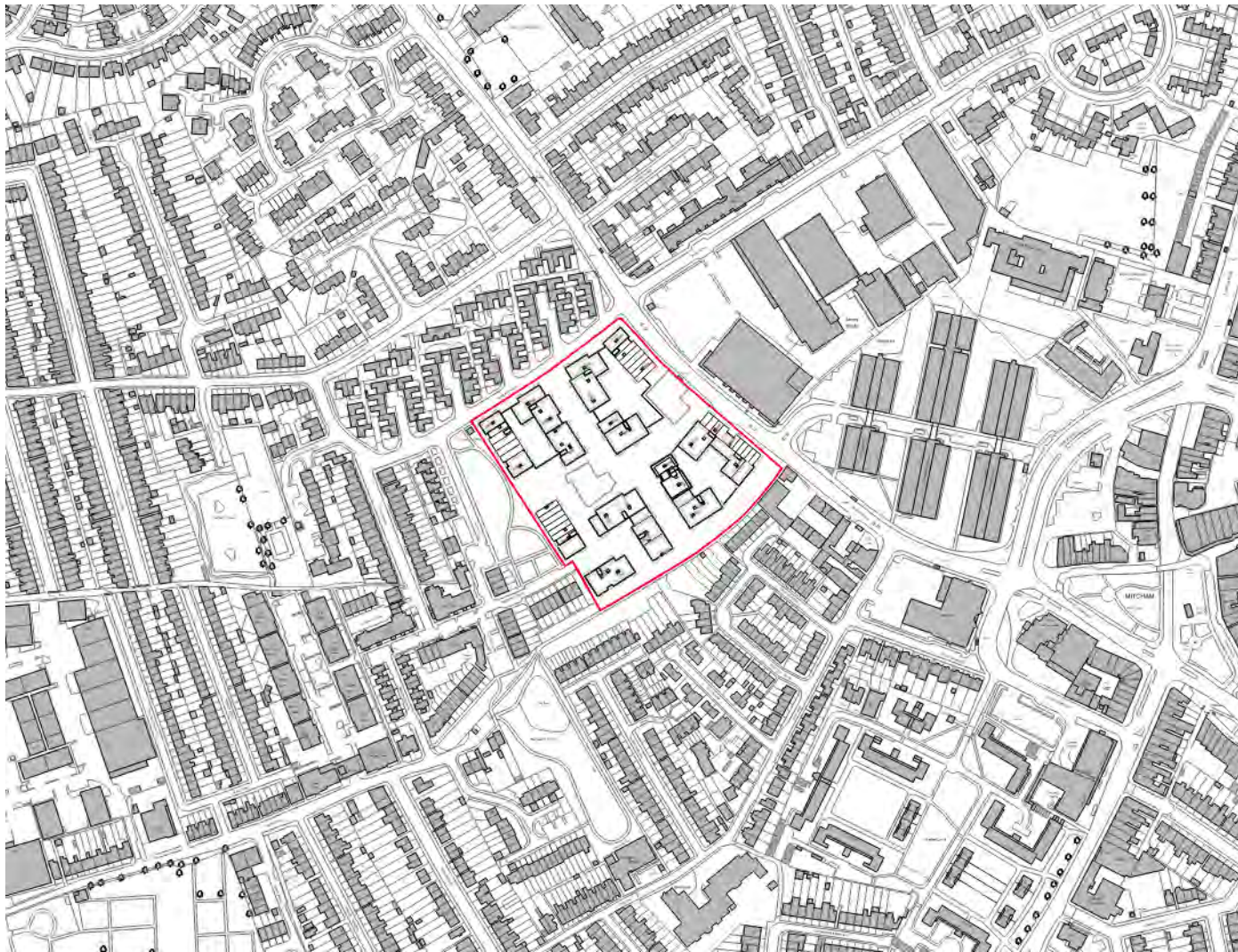


- Multiple design workshops with LB Merton & 2 GLA Pre Apps
- Three public exhibitions held over a nine-month period
- Public meeting held with local MP (Siobhian McDonagh). Attended by 75 people
- Key changes:
 - Reduced heights from 14 storeys to 9 storeys
 - Reduced homes from 700 to 595 homes
 - Redesign of access road and central landscaping to provide more open space
 - Increased building articulation and no north facing single aspect homes
 - More generous connection along Field Gate Lane
 - Redesign of southern half of proposals
 - Increased separation distances along Field Gate Lane

- Key documents – Planning Statement, SOCI, DAS

Scheme Overview

SCHEME WITHIN WIDER CONTEXT

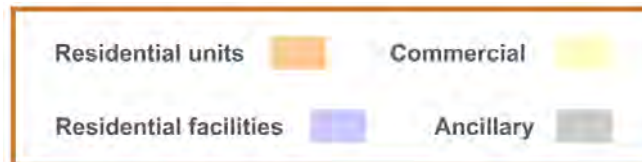


SCHEME WITHIN WIDER CONTEXT



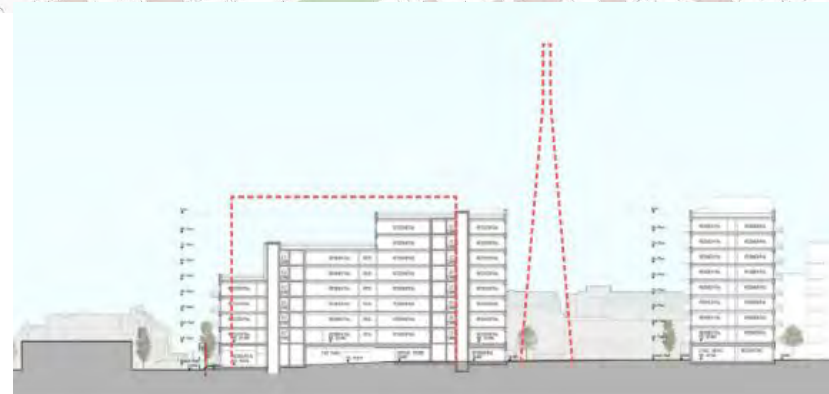
KEY FEATURES

- › Designed by Rolfe Judd Architects and Gillespies
- › 595 residential homes
- › 407 PD / 188 AH (35% by hr)
- › 70% rented / 30% intermediate
- › 3,908 sqft non residential floorspace (flexible commercial / community use)
- › Enhanced route along Field Gate Lane
- › Large central open space
- › 135 (23%) car parking spaces & 2 car club spaces



BUILDING HEIGHTS

- Emerging allocation for up to 9 storeys
- Heights of up to 9 storeys within central part of site
- 5 - 7 storeys around the perimeter
- 1 storey podiums













Affordable Housing

AFFORDABLE HOUSING

- › 35% affordable housing – in line with the London Plan and emerging local policy for Fast Track
- › Footnote 59 submitted to the GLA – awaiting response for GLA Stage 1
- › 70% low cost rent and 30% intermediate
- › All buildings designed as tenure blind
- › Mix and size of homes designed in conjunction with Clarion

TRANSPORT

- Two new entrances
 - Western Road
 - Portland Road
- PTAL 3
- Policy for **up to** 0.75 / unit
- Proposing 135 (0.23) spaces
- Plus 2 car club spaces accessible to all
- Agreement from LBM and TfL
- Cycle parking provided in line with London Plan
- Contribute to CPZ consultation and implementation



Type	No. of Spaces
Undercroft spaces	108
Undercroft spaces WC	18
Surface spaces	9
Car club spaces	2
Total Spaces	137

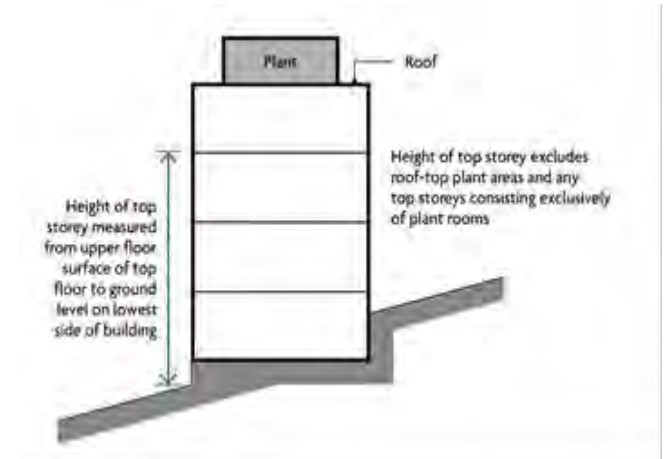
- Key documents – Planning Statement, Transport Assessment, DAS

SUSTAINABILITY

- Air source heat pump strategy with gas back up
- 55.8% reduction in CO2 over Part L 2021
- Overheating is reduced to acceptable levels in accordance with Approved Document O (2021)
- Incorporation of SUDS, including permeable paving and rain gardens
- 13% net biodiversity gain
- Circular economy Statement and Whole Life Cycle Carbon Assessment produced

FIRE

- Confirmation from GLA that:
 - buildings under 30m do not require a 2nd stair
 - measurement should be as insert (right), FFL of top storey
- Tallest building is core E1 at 26.98m



Core	Height
A1	26.90m
B2	26.48m
E1	26.98m
F1	26.68m

FIELD GATE LANE



PORTLAND ROAD





QUESTIONS

[REDACTED]

From: [REDACTED]
Sent: 15 February 2023 07:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Mitcham Gasworks - 22/P3620

Hi [REDACTED]

Thanks for arranging. I would be available at 3pm on Tuesday 28th. Feel free to send me a Teams invite.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[REDACTED] [london.gov.uk](https://www.london.gov.uk)
079 [REDACTED]

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 14 February 2023 17:14
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Subject: RE: Mitcham Gasworks - 22/P3620

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Hello [REDACTED]

I've checked the below times and unfortunately the times/dates don't work. Do you have availability the following week at the following times?

- ☐ 11am – Monday 27th February
- ☐ 3pm – Tuesday 28th February

Kind regards,



[REDACTED]
Planning Associate
MTCP MRTPI

T +44 (0) [REDACTED]

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Holborn
London

WC2A 1AF

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From: [REDACTED]
Sent: 13 February 2023 16:58
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Subject: RE: Mitcham Gasworks - 22/P3620

Hi [REDACTED]

Thanks for confirming that you will be the case officer for this application. We'd be happy to run you through the scheme, I am just checking availability and will get back to you with some suitable dates as soon as possible.

Kind regards,



[REDACTED]
Planning Associate
MTCP MRTPI

T +44 (0) [REDACTED]

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WC2A 1AF
wsp.com

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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 13 February 2023 12:30
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Subject: RE: Mitcham Gasworks - 22/P3620

Hi [REDACTED]

I can confirm I am the case officer for this application.

I would like to get a run through of the scheme if possible. When would you like to do this? I have availability next week – Wednesday, Thursday and Friday mornings between 10am and 12pm, if that works for you?

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

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From: ██████████

Sent: 09 February 2023 13:57

To: ██████████ <██████████ [wsp.com](mailto:██████████@wsp.com)>

Cc: ██████████ <██████████ [merton.gov.uk](mailto:██████████@merton.gov.uk)>; ██████████ <██████████ [wsp.com](mailto:██████████@wsp.com)>; ██████████ <██████████ [berkeleygroup.co.uk](mailto:██████████@berkeleygroup.co.uk)>

Subject: RE: Mitcham Gasworks - 22/P3620

Hi ██████████

Yes – I think a catch up would be useful, however, I will need to first confirm with a manager if the case will be allocated to me. I will let you know.

The case will likely be discussed with the Mayor on 20 March with the advice issued to Merton on 21 March.

Kind regards,

██████████
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
██████████ [london.gov.uk](https://www.london.gov.uk)
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From: ██████████ <██████████ [wsp.com](mailto:██████████@wsp.com)>

Sent: 09 February 2023 09:41

To: ██████████ <██████████ [london.gov.uk](mailto:██████████@london.gov.uk)>

Cc: ██████████ <██████████ [merton.gov.uk](mailto:██████████@merton.gov.uk)>; ██████████ <██████████ [wsp.com](mailto:██████████@wsp.com)>

Subject: RE: Mitcham Gasworks - 22/P3620

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Hello ██████████

Thank you for confirming, this is much appreciated.

As previously mentioned, we would be happy to set up a meeting to take you through the application if this would assist.

Do you at this stage have a target meeting date to take the application to the Mayor to meet the 21 March date for issue of the Stage 1 report?

Kind regards,



■■■■■ ■■■■■
Planning Associate
MTCP MRTPI

T +44 (0) ■■■■■

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From: ■■■■■ <■■■■■@london.gov.uk>
Sent: 09 February 2023 09:20
To: ■■■■■ <■■■■■@wsp.com>
Cc: ■■■■■ <■■■■■@merton.gov.uk>; ■■■■■ <■■■■■@wsp.com>
Subject: RE: Mitcham Gasworks - 22/P3620

Hi ■■■■■

I can confirm we have received the referral (reference number 2023/0107/S1). Stage 1 comments are due to Merton by 21 March.

Kind regards,

■■■■■ ■■■■■
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
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From: ■■■■■ ■■■■■
Sent: 07 February 2023 14:51
To: ■■■■■ <■■■■■@wsp.com>
Cc: ■■■■■ <■■■■■@merton.gov.uk>; ■■■■■ <■■■■■@wsp.com>
Subject: RE: Mitcham Gasworks - 22/P3620

Hi ■■■■■

I have downloaded the files but have still yet to receive the referral from Merton. I will let you know once it comes through and is allocated.

Yes – that is correct. The 30 metre height is to the finished floor level of the uppermost storey with habitable rooms. Does this issue apply to your development?

Kind regards,

Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[\[REDACTED\]@london.gov.uk](mailto: [REDACTED]@london.gov.uk)
079 [REDACTED]

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 07 February 2023 10:53
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Mitcham Gasworks - 22/P3620

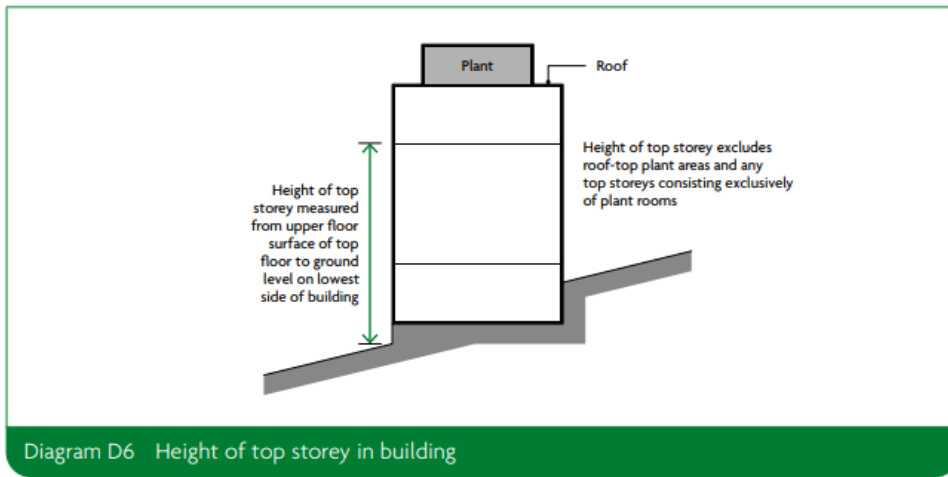
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Hello [REDACTED]

Hopefully you received my email from last week and were able to download the documentation for the Mitcham Gasworks application. Please can you confirm whether you have received the formal referral of the application and that you have all the documentation required for a valid referral?

I just also wanted to double check the position that the GLA are taking following the Building Regulations Fire Safety Approved Document B consultation in December.

My understanding is that the Mayor is not accepting proposals being referred that include residential buildings over 30m in height with a single staircase. The 30 metres trigger is to be measured from the upper floor surface of the top floor to ground level on the lowest side of the building (excluding roof top plant and any storeys consisting exclusively of plant rooms), as illustrated in Diagram D6 from Approved document B:



Please can you confirm this position and clarify whether this is the approach the GLA are taking to measure the distance?

Kind regards,



■■■■ ■■■■
Planning Associate
MTCP MRTPI

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From: ■■■■ ■■■■
Sent: 03 February 2023 12:24
To: ■■■■ ■■■■@london.gov.uk
Cc: ■■■■ <■■■■@merton.gov.uk>; ■■■■ ■■■■ <■■■■@wsp.com>
Subject: Mitcham Gasworks - 22/P3620

Hello ■■■■

I am emailing further to our telephone conversation. As discussed, the planning application for the redevelopment of Mitcham Gasworks has been validated by LB Merton.

I understand that you have heard from LB Merton with regards to the GLA referral and expect the formal referral to be made very shortly.

The application documents can be found on the Council's website [here](#).

I thought it might also be useful to provide you with a WeTransfer link to the submission as well: <https://we.tl/t-wSIKfy8eyU>

Please do let me know if you have any questions in relation to the submission, and I would be happy to talk the application through with you, should this assist.

Kind regards,



Planning Associate
MTCP MRTPI

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[REDACTED]

From: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Sent: 09 February 2023 13:18
To: [REDACTED]
Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Thanks [REDACTED]
I understand [REDACTED] at WSP has also been in touch with the offer of a briefing.
Please let her know if this would be helpful.
Kind regards,
[REDACTED]

Senior Development Manager
Berkeley Ventures
Berkeley Ventures
21b Albert Embankment SE1 7GR
[REDACTED]

St William Homes LLP – Registered in England and Wales Number OC396332
Registered Office - Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG
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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 09 February 2023 09:19
To: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
I passed the footnote 59 information to [REDACTED] so you can discuss with them tomorrow.
I can confirm we have received the referral (reference number 2023/0107/S1). Stage 1 comments are due to Merton by 21 March.
Kind regards,
[REDACTED]

Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Sent: 08 February 2023 16:31
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
Just left you a voicemail.

I've been informed by LB Merton that they have now gone through the correct referral process regarding Mitcham Gasworks.

There is a meeting between John Finlayson, [REDACTED] Heather Juman and a number of Berkeley colleagues on Friday regarding affordable housing.

I understand Mitcham Gasworks is on the agenda, so want to check that the Footnote 59 information has been passed on to them ahead of this.

Can you please come back to me with an update?

Kind regards,

[REDACTED]
[REDACTED]
Senior Development Manager
Berkeley Ventures
Berkeley Ventures
21b Albert Embankment SE1 7GR

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Registered Office - Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG
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From: [REDACTED]
Sent: 01 February 2023 17:01
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

Hi [REDACTED]
I have gone back to the case officer at Merton [REDACTED] [REDACTED] to check.
They have registered the application so it should be heading your way.
Conscious of the Footnote 59 Fast Track information that has been provided separately to the other submission documents.

Kind regards,

[REDACTED]
[REDACTED]
Senior Development Manager
Berkeley Ventures
Berkeley Ventures
21b Albert Embankment SE1 7GR

St William Homes LLP – Registered in England and Wales Number OC396332
Registered Office - Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG
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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 01 February 2023 16:28
To: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>
Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
It appears we have not received the referral yet. Have Merton referred it yet?
I will keep an eye on it and get in touch when it is allocated.

Kind regards,

[REDACTED]
[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[REDACTED]@london.gov.uk

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From: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>

Sent: 01 February 2023 16:03

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
Just wanted to check if you had received the Stage 1 referral through for Mitcham Gasworks from LB Merton?
Let me know if a catch up would be helpful or if you need any further information.

Kind regards,

[REDACTED]
Senior Development Manager
Berkeley Ventures
Berkeley Ventures
21b Albert Embankment SE1 7GR

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Sent: 09 January 2023 09:58

To: [REDACTED] <[REDACTED]@berkeleygroup.co.uk>

Cc: [REDACTED] <[REDACTED]@wsp.com>; John Finlayson <[REDACTED]@london.gov.uk>

Subject: RE: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
I hope you are well and Happy New Year.
Thanks for providing the evidence. I will consult viability colleagues once we receive the Stage 1 referral from Merton and get in touch with you if further information is required.

Kind regards,

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Sent: 06 January 2023 17:49

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>; John Finlayson <[REDACTED]@london.gov.uk>

Subject: Mitcham Gasworks Footnote59 Extraordinary Abnormals Submission

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Hi [REDACTED]
I hope you are well and had a good break over Christmas.
We recently submitted planning for Mitcham Gasworks and are currently waiting on validation from LB Merton.

As previously discussed in our pre application meetings, we are proposing to follow the Fast Track Route with regards to affordable housing. With the gasworks being a surplus utility site, there are significant decontamination, enabling and remediation costs associated with bringing the site forward for development.

I have attached evidence of these costs that demonstrate the impact of the sites previous use on the viability of the proposed redevelopment, which demonstrate that a 35% affordable housing threshold should be engaged, in line with Footnote 59 of Policy H5.

Please let me know if it would be helpful to discuss or if you require any further information.

Kind regards,



Senior Development Manager
Berkeley Ventures

MITCHAM GASWORKS SITE, MITCHAM



Exceptional Enabling / Abnormal Costs – Summary Note

JANUARY 2023

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1. INTRODUCTION

- 1.1 St William was formed as a Joint Venture (JV) between National Grid and the Berkeley Group. St William transforms redundant gasworks sites into new places for people to live, work and spend time. The current portfolio in London has the potential to deliver over 20,000 new homes across 12 boroughs, including 7,000 affordable homes as well as other key social infrastructure such as public open space and schools.
- 1.2 Former gasworks sites are technically complex and require significant investment and time to prepare them to be released for redevelopment. A key benefit of working closely with the gas company is that it enables housing to be delivered earlier as St William are able to progress planning while the gas company undertakes infrastructure rationalisation, remediation and pre-development works.
- 1.3 The London Plan recognises the benefit that former gasworks sites will play in the delivery of new homes. It acknowledges that some surplus utilities will be subject to substantial abnormal development costs and therefore a 35 percent affordable housing threshold (when utilising the fast track approach to affordable housing – draft Policy H5) could be applied as opposed to 50% for other surplus industrial sites. In order for this policy to apply there is a requirement to demonstrate the unique and extraordinary abnormal activities/costs associated in bringing these sites forward for development.
- 1.4 This note explains the background to the current status of gasworks sites and the process for making them available for development. It highlights the associated abnormal activities which are unique to these types of sites resulting in additional development costs and extended development programme, impacting upon the financial return available for the developer. This is demonstrated by the impact of the abnormal costs and extended programme on St William's site specific proposals for Mitcham Gasworks, in the London Borough of Merton (LBM).
- 1.5 The analysis set out later in this note demonstrates why the development risk associated with gasworks sites is significantly greater than for other brownfield sites as a result of:
- site constraints;
 - exceptional abnormal costs;
 - programme risk; and
 - higher project finance costs.

2. HISTORY OF GAS INFRASTRUCTURE

- 2.1 Most gasworks sites were originally constructed in the 19th century to produce gas (commonly referred to as town gas) as well as for gas storage. The manufacture of town gas required the burning of coal in coke ovens inside large retort houses. Within the UK this type of gas production went on until well after World War II. This process was very dirty and generated excess tar, hydrocarbons and other contaminants as waste products.
- 2.2 By the late 1960's/early 1970's town gas was gradually replaced by natural gas and therefore the production function was no longer required and ceased on all gasworks sites. At that time gas was still stored in the gasholders (also known as gasometers). However, recent changes in the way gas is stored has meant that the gasholders themselves are no longer required. This has resulted in the decommissioning of the entire gasholder fleet across the UK.

- 2.3 Gasworks typically evolved over many decades in an adhoc way with very little planning on where the various infrastructure was located. This resulted in a very inefficient use of land. The decommissioning and subsequent dismantling of the gasholders will free up large areas of land, which previously has been non-developable. In parallel, this has created an opportunity to extensively rationalise the remaining infrastructure allowing land to become efficiently used in land use planning terms and become available for alternative uses, which could include new residential development.
- 2.4 Once the gasholders have been dismantled the only operational gas infrastructure to remain will be a Pressure Reduction Station (PRS) or gas governor and the associated below ground gas mains. Importantly, the PRS and gas governors still allows the site to continue to perform its critical function of distributing gas but it is achieved in a more efficient way and with no net loss of 'industrial capacity'.

3. REDEVELOPMENT CONSIDERATIONS AND RISK ASSESSMENT

- 3.1 In light of the changes in the way gas is stored, there is now an opportunity for the landowners of gasworks sites to consider the release of their surplus land for new development. However, the decision to undertake the rationalisation of the existing gas infrastructure will be determined by whether there is general support for this new development from key stakeholders (including the local planning authority) and whether planning policy promotes the need and willingness to deliver housing. Without this support, there are few drivers to progress with any significant rationalisation to the existing infrastructure.
- 3.2 Landowners are not obliged to undertake wholesale rationalisation or to fully remediate gasworks sites (unless there are environmental drivers to do so). This will only happen where there is a viable development opportunity. Therefore, when making their decision it is entirely reasonable for the landowner to consider a 'do nothing' scenario where only minimal works would be undertaken normally to meet a specific statutory requirement. The incentive to release land for new development is heavily dependent on there being a viable development return which reflects the considerable cost, risk and uncertainty taken in bringing forward gasworks sites for this purpose.
- 3.3 If there is no incentive to release the site for redevelopment then one possible alternative use is for temporary storage. A number of gasworks sites have been used/continue to be used for this purpose and for a range of tenants. The positive asset management of these sites means the landowner has the ability to look other options beyond comprehensive redevelopment.
- 3.4 When making investment decisions property development is considered to be higher risk. This risk increases the more complex the redevelopment e.g. brownfield sites present a higher risk as they normally require some form of site clearance/demolition and possibly remediation works particularly where the previous use has been industrial. With gasworks sites, the decision to invest in redevelopment has to be made much earlier because of the scale, complexity, duration and cost of the works (particularly in respect of the rationalisation of gas infrastructure) to enable the site to be available for redevelopment. This significantly increases the risk profile, meaning that redevelopment of gasworks sites will sit at the top of the risk spectrum for any investment decision.
- 3.5 One of the consequences of this higher risk profile is the ability to secure funding for development projects. The funding position becomes even more uncertain because of the long term environmental liability that comes with gasworks sites due to the high levels of contamination. In these circumstances, funding is only likely to be offered with higher interest rates and potentially alongside other incentives for the lender such as sales overage. This will impact upon finance costs and developer return.

- 3.6 The wider opportunity of bringing gasworks sites forward for development across London exists because of the JV between National Grid and Berkeley Group.

4. PLANNING POLICY

- 4.1 The London Plan (March 2021) confirms that surplus utility sites (including gasworks) will be an important source of housing supply (Policy H1 B (2)) over the Plan period. However, it also recognises that making these sites available for development will be subject to substantial enabling costs (Footnote 59).
- 4.2 The London Plan also clarifies the application of Policy H5 in respect of Former Utility Sites and makes it clear that a minimum 35% affordable housing threshold can be applied to follow the fast track route on applications for the redevelopment of surplus utility sites. This can be applied where it can be robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development (Footnote 59).
- 4.3 As previously noted in this report, the rationalisation and modernisation of gas infrastructure has meant that the gas holders are no longer required to maintain supply and store gas. As a result, there is no let loss in capacity of the site's ability to function as a utility site and the site becomes available and provides an opportunity for development.
- 4.4 The nature of the holders and the utility use means that there is no existing or functioning employment floorspace, and the site generates a negligible number of jobs (less than 1 FTE).
- 4.5 The site is not designated as Strategic Industrial Land (SIL), nor is it a Borough Employment Area.
- 4.6 Given the availability of the site, its previous function as a utility site and its local policy designation there is a clear planning justification for this site to deliver new homes. The draft London Plan policy supports such a loss for the delivery of homes on this site.

5. RELEASING GASWORKS SITES FOR DEVELOPMENT

- 5.1 When releasing gasworks sites for development there are a number of different activities which need to be undertaken which are unique to this type of site. These are in effect 'abnormal' abnormal activities because they are not required on a standard brownfield site (these are also in addition to the abnormalities normally associated with standard construction). The activities have to be carefully sequenced because the rationalisation of the gas infrastructure and elements of the remediation works cannot be undertaken simultaneously. They must also be undertaken in advance of standard building works and on St William sites will normally take place in advance of any planning permission for new development. The following section sets out the extraordinary abnormalities that you typically find on a gasworks site.

Gas Infrastructure Rationalisation

- 5.2 To facilitate the site for development, new gas infrastructure is likely to be required, including a new PRS, gas mains and associated infrastructure. This investment in the existing infrastructure alongside the removal of the gasholder means the majority of the site is then available for redevelopment.
- 5.3 The PRS's are not affected by the HSE's land use planning methodology 'Advice for Developments near Hazardous Installations' (PADHI) zones, as there are no high pressure gas mains running to or from this site. In fact a considerable benefit from bringing forward these sites for redevelopment is the revocation of the existing Hazardous Substances Consent

(required for storing gas in the gasholders) potentially freeing up surrounding third party land for new development which had been previously blighted by the HSE's PADHI zones. Furthermore, the upgraded PRS facilities will generally be quieter and be designed in such a way to be sympathetic to neighbouring uses including existing residential properties that can currently hear the PRS.

Site Clearance and Demolition

- 5.4 Demolition and site clearance of the redundant gasholders, ancillary buildings and pipelines together with backfilling of the gasholders will usually take place. The gasholder voids are filled with water and so dewatering and desludging is required. Dewatering of the gasholder tank is a long process (potentially up to 6 months for each tank), depending on allowable discharge rate. The dewatering must be done before demolition commences. After dewatering, the remaining sludge, which is a highly hazardous waste, must be removed by tankers to a specialist treatment facility.
- 5.5 The bell of the gasholder, which is not visible at ground level, sits within the tank and is a significant steel/iron structure. Demolition of a gasholder, including the bell and the frame, typically takes around 4 months. The stability of the gasholder tanks needs to be assessed in advance of any demolition. Failure can result in the tank overturning. As a result, the various associated activities required to deal with the structure need to be sequenced because they cannot be undertaken simultaneously. This impacts upon the demolition programme for the gasholder structures.

Retention of Gasholders

- 5.6 Where elements of the gasholders frames are to be retained and reused in the future development these will be carefully removed and placed in secure storage off-site, where they will remain in storage for a number of years until the site is redeveloped and they can be brought back into beneficial use. Due to the age and structural soundness of many gasholders, the dismantling and retention process is complex and risky. The overall structural stability of the gasholder frame needs to be assessed in order to decide a safe methodology for dismantling. Considerable lay down areas on site can be required, as well as the use of complex cradles and bracing, particularly for the cast iron frames. This often prevents other works being undertaken on site at the same time impacting the wider construction programme. Gasholder retention does not apply on this site.

Site Wide Remediation

- 5.7 All gasworks sites are contaminated from longstanding industrial use. There is a complex array of contaminants that must be dealt with. These typically include:
- Free hydrocarbons
 - Spent oxides
 - Ammonia liquors and other ammonia based products
 - Coal tar and other tars
 - Polycyclic Aromatic Hydrocarbons (PAH) – these are a group of more than 100 chemicals including tetracene, triphenylene, benzofluorene and other petroleum based hydrocarbons
 - Non-aqueous phase liquids (NAPL) – including light non-aqueous phase liquid (LNAPL) and dense non-aqueous phase liquid (DNAPL)

- Volatile organic compounds (VOCs) – including benzene, toluene, ethylbenzene, xylene, naphthalene and vinyl chloride
 - Cyanide – both free and complex cyanide
 - Sulphur products – including sulphates and sulfonic acids
 - Heavy metals – including arsenic, mercury, manganese, zinc, nickel, copper, chromium and cadmium
 - Acidic soils
 - Alkaline soils
 - Polychlorinated biphenyls (PCB)
 - Asbestos – in various forms
 - Phenolic compounds
 - Chlorides
 - Ash
- 5.8 The site needs to be fully remediated to meet the required standards for future residential use and public access. Given the nature of the potential contaminants, extensive site investigation and laboratory testing is required (considerably in excess of what is required on a standard brownfield site). From this, a detailed quantitative risk assessment and remediation strategy needs to be formulated. This is very different from most brownfield sites where typically only pockets or hotspots of contamination may exist.
- 5.9 The remediation strategy is then translated into a detailed design by an appointed specialist contractor. The strategy will incorporate the removal of untreatable hazardous contaminants, the on-site treatment of other hazardous and non-hazardous contaminants and a site wide capping strategy. The removal of the untreatable hazardous contaminants requires specialist off-site treatment and additional disposal costs. The on-site treatment of hazardous material is also a complex and timely process, which can only be completed under strict regulatory controls with an approved contractor. The whole investigation, design, removal, treatment and capping process has a major impact on project costs, particularly as most of this work has to be completed before the main construction programme begins.

Groundwater Monitoring

- 5.10 Some of these contaminants can have an impact on groundwater quality – particularly LNAPL and DNALP. These tar based products cling to soil particles at depth and are difficult to treat or remove. Therefore, some gasworks sites require extensive groundwater treatment. This can be an expensive, slow and time-consuming process.
- 5.11 Comprehensive groundwater monitoring is required where there are sensitive receptors such as aquifers, rivers, canals and other watercourses. The extent and duration of the monitoring will be dependent upon the site specific conditions and could be required for long periods of time, post completion of physical works. In addition, the results of the monitoring could lead to the requirement of additional on-site treatment to be carried out. This uncertainty has a direct impact upon the development programme.

Regulatory Approval

- 5.12 In addition to securing the relevant planning permissions, both the site wide remediation and groundwater monitoring will require approval and sign off (verification) from the Environment Agency (EA) and Local Authority Environmental Health Department (EHO).

Post Planning Activities

- 5.13 Once planning permission has been granted for any new development there are still a number of activities (pre-construction enabling works) that need to be undertaken in advance of standard construction which are again unique to this type of site. These include:
- Reducing site levels;
 - Removal of in-ground obstructions;
 - Further on-site and off-site remediation;
 - Specialist substructure design and installation;
 - Other specialist design requirements; and
 - Relocation of telecommunications equipment.

Reducing Site Levels

- 5.14 Most gasworks sites have artificially high site levels comprising made ground commonly formed from the remains of buildings, structures or waste products previously accommodated on the site. This can often require significant excavation followed by the remediation of the excavated material either to be reused or taken off-site.

Removal of In-ground Obstructions

- 5.15 Whilst above ground structures are usually removed through demolition and site clearance, below ground elements can often still be found in-situ. These can consist of massive reinforced concrete structures relating to the former retort houses, as well as other concrete structures relating to the purification and cleaning of gas, which were randomly erected over the lifetime of the site (which can often be circa 150 years).
- 5.16 Other obstructions that can be encountered include redundant above and below ground gas pipework. These can be significant obstructions often comprising welded steel pipes up to 1200mm in diameter. Most of these obstructions need to be accurately traced and removed prior to new foundations being installed. They also hold potentially contaminated substances and coal tar residues.
- 5.17 In-ground obstructions create considerable uncertainty and risk because they are often 'unknown' due to limited historical information and only discovered once construction works have commenced. For example, at Clarendon Gasworks a significant amount of asbestos was found within one of the gasholders, which had not previously been identified. Once the material is excavated it must be remediated before either being reused or taken off-site.

Substructure Design

- 5.18 Given the extent of the in-ground obstructions, in particular the remaining gasholder bases, the substructure (foundations) for the new development will need to be appropriately designed. All in-ground gasholders require a large quantum of imported fill to bring the inside of the tank to the required formation level. Extensive investigation is required to ascertain the external

profile of the gasholder wall (often this is significantly wider at its base than what is visible at the top of the wall). This will determine how close new structures can be built next to the tank walls.

- 5.19 The top of the dumping inside deeper gasholders can be faced with a variety of materials including brick, stone, concrete and steel. This may need to be removed or broken before new foundations or piling can be installed, and given their depth and construction the dumpings are very challenging to survey in detail prior to construction commencing on site. On historically filled gasholder tanks the depth of material can be considerable (e.g. up to 17m below the existing site level). This means piling may have to be pre-bored and coring through obstructions required.
- 5.20 The stability of the gasholder tanks also needs to be assessed if it is being used as a basement for any new development. The structural integrity of the gasholder tank walls also have to be assessed. If there are defects (e.g. cracks in the structure) then this may cause leaking if the surrounding water table is high. This can affect the ability to dewater the tank and potentially its ability to be used as a basement, although there is no proposal to use the gasholder tanks as a basement on this site.
- 5.21 Often foundations will be required to straddle the wall of the former gasholder tanks. On these occasions a significant structure will be required to bridge over the wall, so that the piled foundation can be installed either side of the tank wall structures
- 5.22 Perched groundwater can be encountered when laying new foundations and will normally require some form of treatment before being disposed of. The potential impact of this needs to be designed into the foundation design and installation programme.

Other Specialist Design Requirements

- 5.23 Most gasworks sites have a risk of ground gas. Therefore, this requires all habitable space in the new development to be protected by gas membranes. These membranes lead to cost increases and require third party approval by accredited assessors.

Relocation of Telecommunications Equipment

- 5.24 The majority of gasworks sites are home to telecoms masts and structures. These were previously owned by National Grid but subsequently sold to Arqiva. Therefore, any new development proposals coming forward on a gasworks site will need to include the re-provision of telecoms infrastructure to accommodate the mobile phone operator's equipment. This will normally be through a new rooftop installation. Operators are protected by the Electronic Communications Code and are under no obligation to relocate. Therefore, any proposed new location requires detailed network modelling, planning and legal negotiation. In addition, new buildings will need to respect and not interfere with network coverage. New leases will also need to be agreed as part of the relocation.

Programme, Risk and Financing Costs

- 5.25 The timescales for completing all of the pre-development activities required to release the site for development will vary but can typically take between 2 - 5 years. Unlike other brownfield sites, gasworks sites require this longer lead in period to carry out the gas rationalisation process and site remediation as these must be completed in advance of standard building works. This significantly extends the development programme increasing both cost and risk. As mentioned earlier, the higher risk profile of developing gasworks sites will impact upon developers' ability to secure funding for these types of projects.

- 5.26 The high level of capital expenditure required in the early stages of the project (well in advance of any return from sales completions) results in a worsening development cash flow position. Not only does this impact upon developer return but it also substantially effects the financing costs for the development. This is demonstrated later in this Note with specific reference to Mitcham Gasworks.

6. MITCHAM GASWORKS

Background

- 6.1 Mitcham Gasworks is a 2.43 ha (6 acres) former gasworks site which is located within the Lavender Fields Ward in Mitcham, South London. The Lavender Gardens development by Barratt Homes to the west previously also formed part of the same gasworks.
- 6.2 Mitcham Gasworks was formed in 1849 as the Mitcham, Merton & Tooting Gas Light & Coke Company. In 1864 it merged with a gas company in Wimbledon to form the Mitcham & Wimbledon District Gas Company Ltd, as a result of this merger the Wimbledon Gasworks became a holder station and production was concentrated at Mitcham.
- 6.3 Given its dual function for gas production and gas storage, Mitcham Gasworks accommodated a range of gas infrastructure and associated buildings. This is highlighted in historical aerial photographs of the site, which are attached at Appendix 1.
- 6.4 There was originally a single large gasholder on the south of the site. Two further gasholders were introduced in the late 1800's. By 1913, the large gasholder in the northern part of the site is present alongside the two medium sized holders, whilst the large holder that was present in the south has been replaced with a number of gasworks buildings. Throughout this period there is often significant overlapping of foundations and structures, with the true extent of this unknown until full site works commence.
- 6.5 The majority of buildings have been demolished on site by the 1960's but the three gasholders remain, with the two medium holders demolished before 2000.
- 6.6 Some of the gas infrastructure has already been rationalised in preparation for the site coming forward for development. The PRS on Western Road has been consolidated to a below ground compound with gas mains also relocated. Demolition of the final above-ground gasholder structure was undertaken from June 2021 to January 2022, along with the removal of some redundant pipework.

Site Levels and In-ground Obstructions

- 6.7 The site broadly slopes away from the centre of the site, which is at +19.8m AOD. The boundaries vary from approximately +19.2m AOD at the Barratt boundary to approximately +17.3m AOD on the corner of Portland and Western Road. There is significant build up around the remaining gasholder walls in the north of the site with a c.2m retaining wall running along the northern boundary with Portland Road. Made ground is typically 1 - 2m in depth across the site.
- 6.8 In 2010 and 2011, a large portion of the south of the site was remediated to "secure vacant land". Works included service investigation, demolition of the former boiler house and removal of the sources of highest contamination. The extent of in-ground obstructions on the site is still expected to be considerable and may include the remnants of gas purifier tanks, oil stores, tar tanks concrete slabs and foundations. A plan attached at Appendix 2 identifies the various

historical structures across the site demonstrating the significant underground obstructions that will need to be removed.

- 6.9 All three of the most recent gasholder frames have been removed. The latest demolition involved the partial backfill of the holder void with clean material. However, the materials used to backfill the other historic gasholders is generally unknown, especially at the base of the holder. These gasholders had diameters of 25m and 30m and were 6.4m to 9m deep respectively. Each holder has a significant dumping at their base, which are assumed to be a combination of brick, concrete and stone. The above ground element of the gasholder walls in the north of the site still need to be removed, whilst the walls of the other gasholders will need to be broken out below ground to facilitate development. However, the tanks will be left in-situ due to their depth and will require specialist piling strategies in order to accommodate construction above.

Remediation Works

- 6.10 Using information provided by National Grid alongside its own site investigation works, St William have undertaken a Preliminary Risk Assessment (PRA) to assess the existing conditions on site. Given its historical use for gas storage and gas manufacturing, there is contamination across the site. Although the 2010/2011 remediation works have improved the position to a secure vacant land use, further extensive remediation is required to bring the site forward for residential use.
- 6.11 The remediation strategy will involve the removal and treatment of contaminated hotspots and the off-site disposal of grossly impacted hazardous materials, as well as in-situ groundwater remediation. For this reason, the remediation of the site will be challenging, time consuming and complex.
- 6.12 The ground water levels and the proximity to sensitive receptors mean that ongoing groundwater clean-up and monitoring will be required.
- 6.13 St William engaged with the EA and the Local Planning Authority's Contaminated Land Officer in October 2022 and will need to agree the strategy for remediating the site. This reflects the extent of works required, which is well beyond that which would normally be associated with a typical brownfield site.

Other Abnormal Works

- 6.14 The PRS on Western Road has already been rationalised to facilitate redevelopment of the site. New gas mains and a below ground PRS have been installed.
- 6.15 The existing central PRS contains outdated equipment, which emits onerous levels of noise. Noise mitigation is being progressed with the PRS operator SGN to reduce noise emissions. This may include the replacement of a high proportion of the existing equipment, along with in-situ acoustic measures such as silencers and the potential for acoustic housing and lagging. These measures are both complex and costly.
- 6.16 The site is home to a large 65m telecommunications mast, which lies in the centre of the site. This will be relocated to a new roof top installation within the proposed development.

Summary of Abnormal Activity Costs

- 6.17 The abnormal activity costs for Mitcham Gasworks are estimated at circa £13.2m. A detailed schedule setting out the specific works and associated costs is attached at Appendix 3.

Contingency and Risk Management

- 6.18 Standard build costs would normally assume a contingency of 5%. Given the uncertainty, complexity and specialist nature of the enabling activities associated with gasworks sites, higher contingency rates ranging from 5% to 50% have been applied to the schedule in Appendix 3. This is because it is much harder to accurately cost some of the proposed activities at this stage. For example, the full extent of remediation will not be apparent until the physical works on the site have commenced. Different elements of work will have different contingencies based on the risk and uncertainty associated with them.
- 6.19 Guidance on calculating project contingency is provided in the HM Treasury publication 'Green Book supplementary guidance: optimism bias'. The purpose of the guidance is to provide cost and time uplift percentages (the cost of risk management) for generic project categories where there is an absence of more robust primary data. The generic project categories are:
- Standard Buildings
 - Non-standard Buildings
 - Standard Civil Engineering
 - Non-standard Civil Engineering
 - Equipment/Development
 - Outsourcing
- 6.20 In the context of the above, gasworks sites would fall within the 'Non-standard civil engineering projects category' because they involve *"the construction of facilities, in addition to buildings, requiring special design considerations due to space constraints or unusual output specifications e.g. innovative rail, road, utility projects, or upgrade and extension projects"*. The guidance confirms that for ease of determining a project type for building and civil engineering projects, a project is considered "non-standard" if it satisfies any of the following conditions: (a) it is innovative (b) it has mostly unique characteristics; or (c) construction involves a high degree of complexity and/or difficulty.
- 6.21 The guidance confirms that this project category has a percentage adjustment range of 6% to 66% against capital cost. At the project planning stage the guidance recommends using the higher adjustment figure (66%). However, this adjustment figure can be reduced against specific tasks/activities where there is an opportunity for improved risk management.

7. DEVELOPMENT PROGRAMME

- 7.1 As mentioned previously, the timescales for completing all of the enabling activities required to release the site for development will vary but will typically be between 2 - 5 years. In the case of Mitcham Gasworks, the process for bringing the site forward for development has been underway for many years. However, for the purposes of the development appraisal we have only backdated these outgoings to December 2018, at the start of the most recent gas rationalisation works, 5 years before the target date for planning consent.
- 7.2 This time lapse is unique to gasworks sites and has a negative impact upon project cash flows and development viability. For most brownfield sites, the sales period would begin within six months from the commencement of construction and therefore provide an earlier return on

investment. Opportunity cost is a key consideration for any long term development and this of even greater importance in respect gasworks sites because of the level of early expenditure.

8. IMPACT OF ABNORMAL AND FINANCE COSTS

- 8.1 To highlight the higher risk profile associated when developing gasworks sites, St William has modelled two development scenarios for Mitcham Gasworks. The first scenario reflects its current status as a gasworks site and the second scenario assumes it is a standard brownfield site.
- 8.2 The basic approach is to run the two scenarios based on the same scheme, which is the planning scheme comprising 595 homes (415,406 sqft NIA) and 3 commercial units (3,908sqft) along with the same appraisal inputs for revenues and costs apart from abnormal costs, land value and programme.
- 8.3 For the purposes of the modelling exercise, St William has used standard inputs along with inputs provided in the BNPRE LBM Local Plan Housing Viability Study, prepared for LBM in August 2020. Build costs have been assumed using the current BCIS Upper Quartile, with revenues based off the BNPRE report, although with a generous 20% uplift. This is due to St William's belief that the BNPRE report undervalues the sites postcode, along with allowing for revenue growth.
- 8.4 The gasworks land value has been based off previous St William Footnote 59 submissions, whilst the brownfield land value has been based off the BNPRE report's industrial use, with a 50% discount. This is to reflect a typical brownfield use, which would not fall in to the EUV categories set out in the BNPRE report.
- 8.5 When modelling the gasworks site development scenario, the following amendments have been included to reflect the estimated abnormal costs and programme:
- St William estimated abnormal costs of £13.2m; and
 - Development programme has been extended by 4 years to reflect early start of remediation works.
- 8.6 The results of the modelling show a substantially lower profit margin for the gasworks at - 9.21% compared with the brownfield site of - 1.95%. A key difference is the finance costs, [REDACTED] for the gasworks site development in comparison to a brownfield site development. This is a direct consequence of the high level of capital employed over the extended development programme prior to seeing any returns through sales. The modelling highlights that project cash flows are extremely sensitive to this type of scenario. Overall, the abnormal and finance costs for the gasworks site scenario are [REDACTED] those associated with the brownfield site.
- 8.7 Given the like for like basis of the inputs used in the modelling for both development scenarios (apart from abnormal costs and programme) the significant difference in development value will always be consistent. For example, an increase in sales revenues would be reflected in both appraisals leading to the same outcome.
- 8.8 The interest rate used in the modelling is [REDACTED]. However, given the greater risks of developing gasworks sites this could be argued to be even higher making the finance cost position worse than suggested.

9. SUMMARY

- 9.1 The London Plan acknowledges that there are likely to be exceptional costs associated with bringing forward former utility sites for the delivery of new homes. Furthermore, where these exceptional costs can be demonstrated then a 35% affordable housing threshold will be accepted if the Fast Track Route is to be applied (Footnote 59 of Policy H5).
- 9.2 This note has been prepared to highlight the extent of the works/costs required to bring forward development on the former Mitcham Gasworks site. It is evident that the majority of the enabling works to be undertaken are unique to gasworks sites. The abnormal costs required to bring forward development at Mitcham are £13.2m above those that would normally be expected on a standard brownfield site.
- 9.3 It is also clear that the timing and duration of these works negatively impacts upon development viability. This is because the decontamination, enabling and remediation works must always be undertaken upfront of any standard construction work and always well in advance of any future sales launch.
- 9.4 The [REDACTED] cost highlights the impact of this additional upfront expenditure upon cash flow and overall project value. In this case, the abnormal and finance costs associated with the gasworks site development [REDACTED] than with the brownfield site development. These represent significant exceptional costs.
- 9.5 The resulting difference in profit on GDV between the brownfield and gasworks sites is 7.26%. This clearly demonstrates the extraordinary decontamination, enabling and remediation costs that must be incurred to bring this surplus utilities site forward for development. In the context of Policy H5, the Fast Track Route approach in this case is justified.

Appendix 1



Aerial view looking east during gasholder demolition. One PRS can be seen in the centre of the site, with another behind the gasholder. Telecoms mast is in the centre of the site - 2021



Looking north west towards the gasworks, across the Sadler Close construction site - 1972



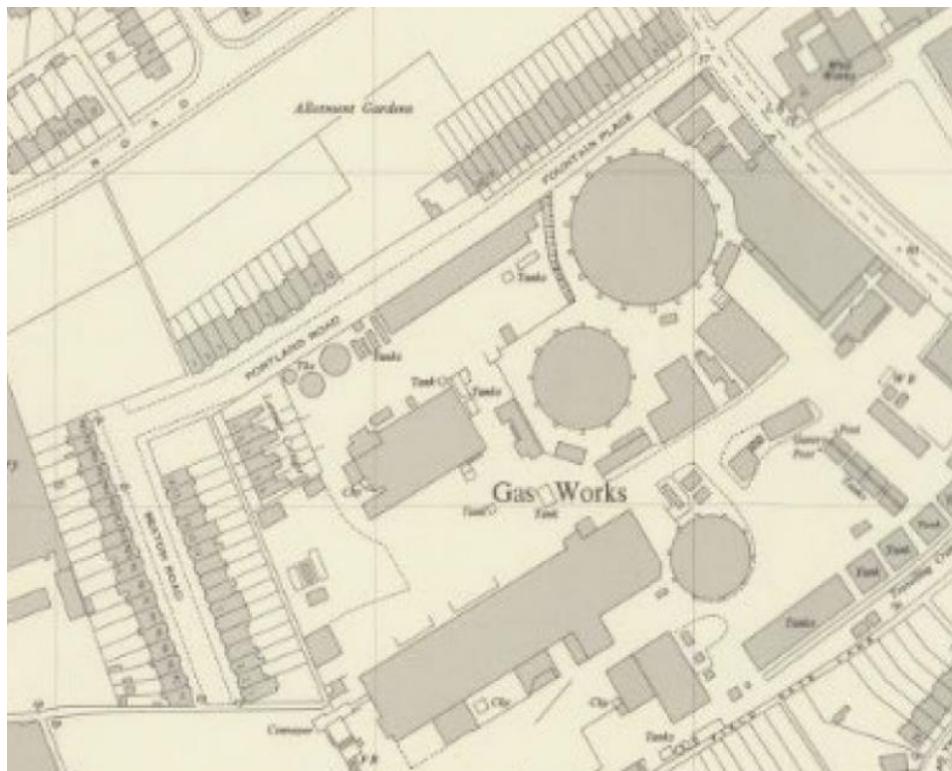
Aerial view of gasworks looking east – 1937



Portland Road looking south east - 1970

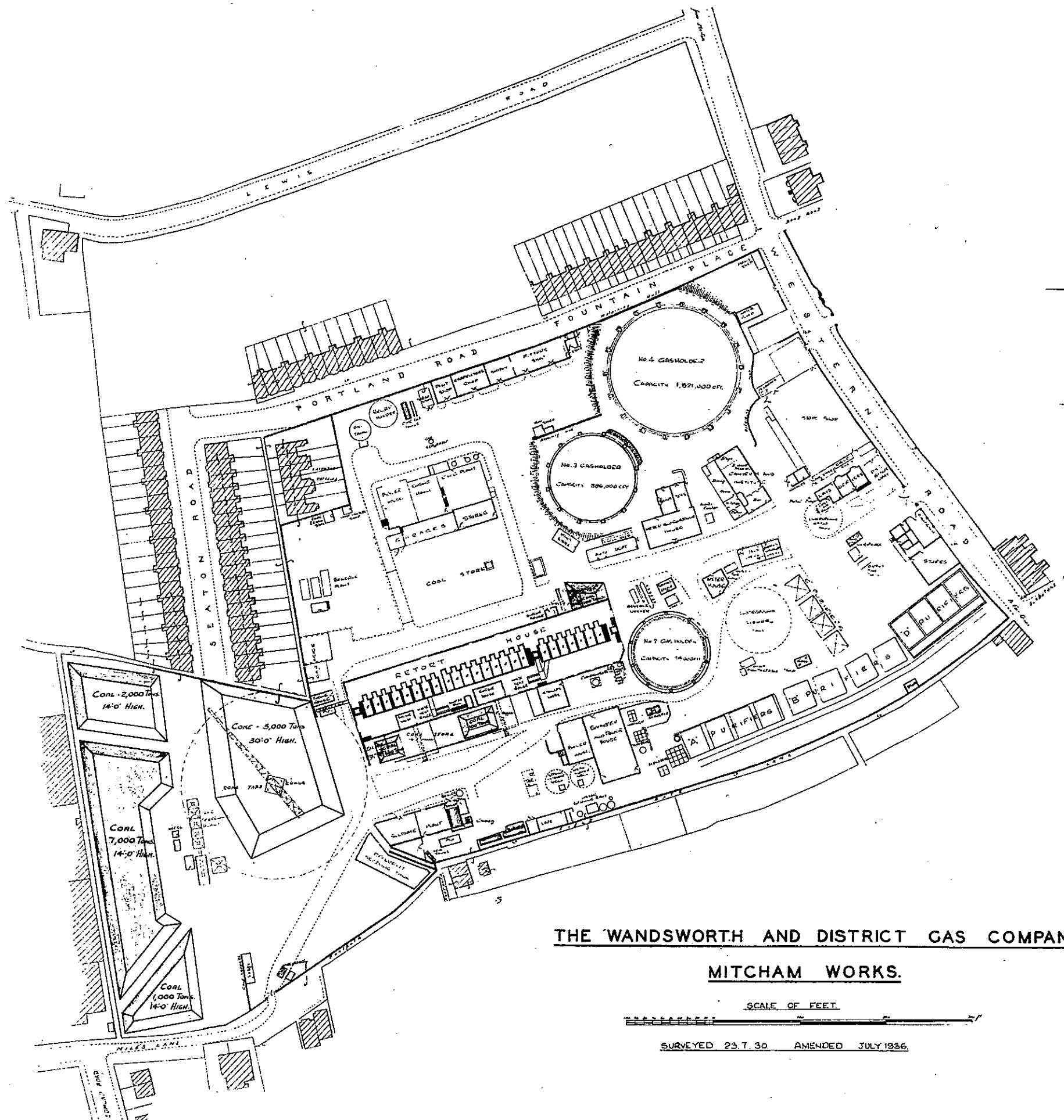


Western Road Entrance – 1960



Map of gasworks -1952

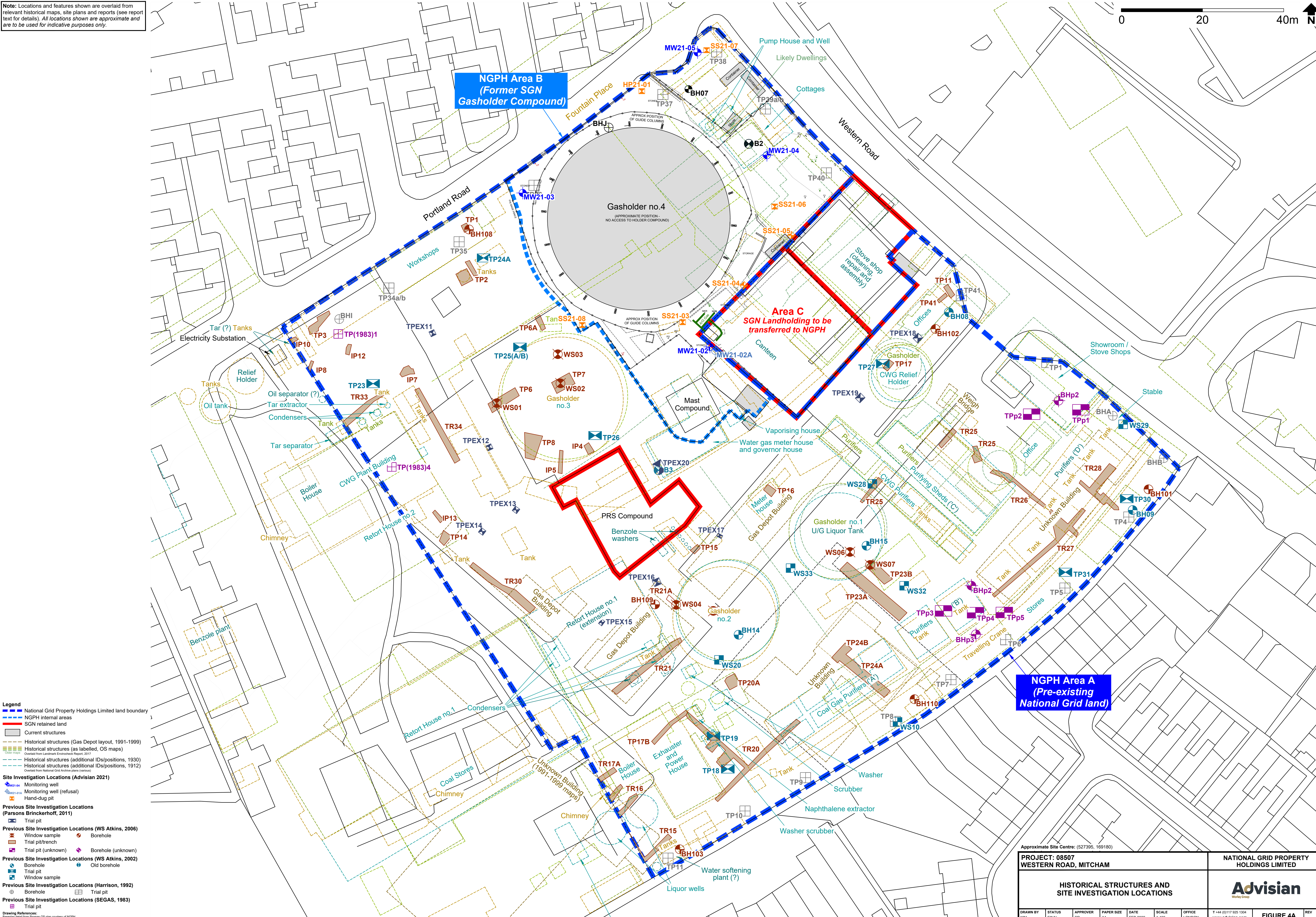
Appendix 2




MITCHAM

Note: Locations and features shown are overlaid from relevant historical maps, site plans and reports (see report text for details). All locations shown are approximate and are to be used for indicative purposes only.

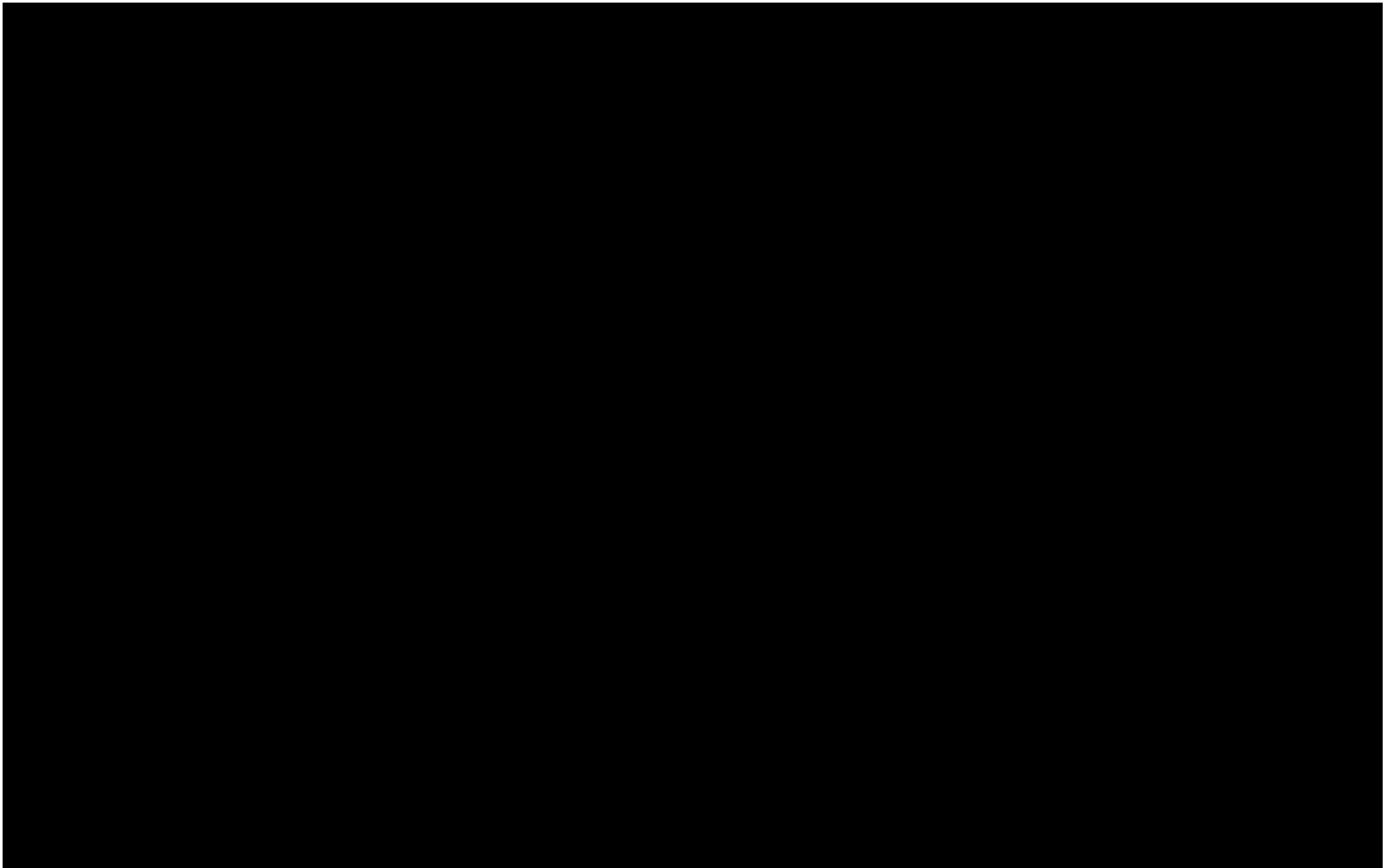
0 20 40m N

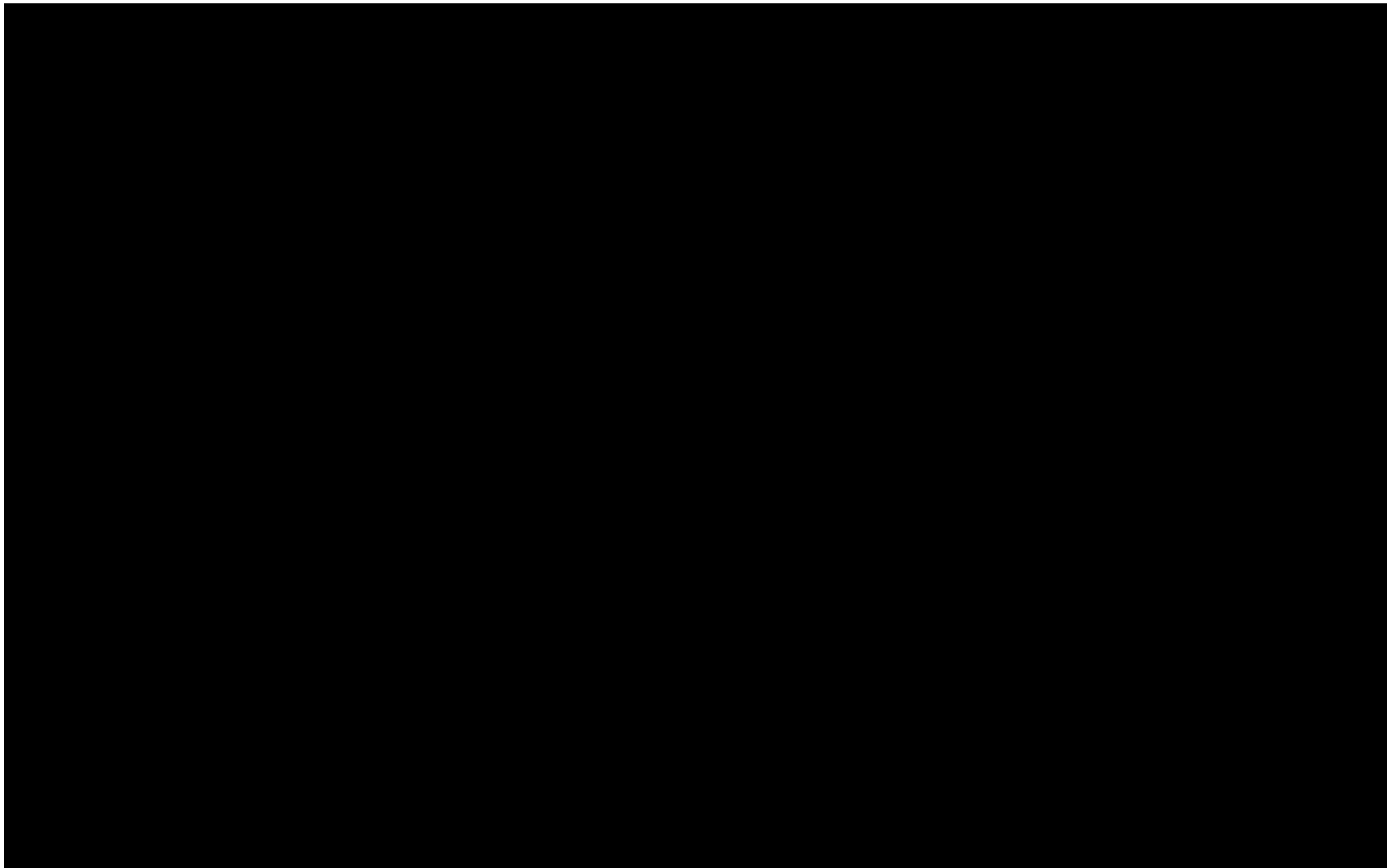


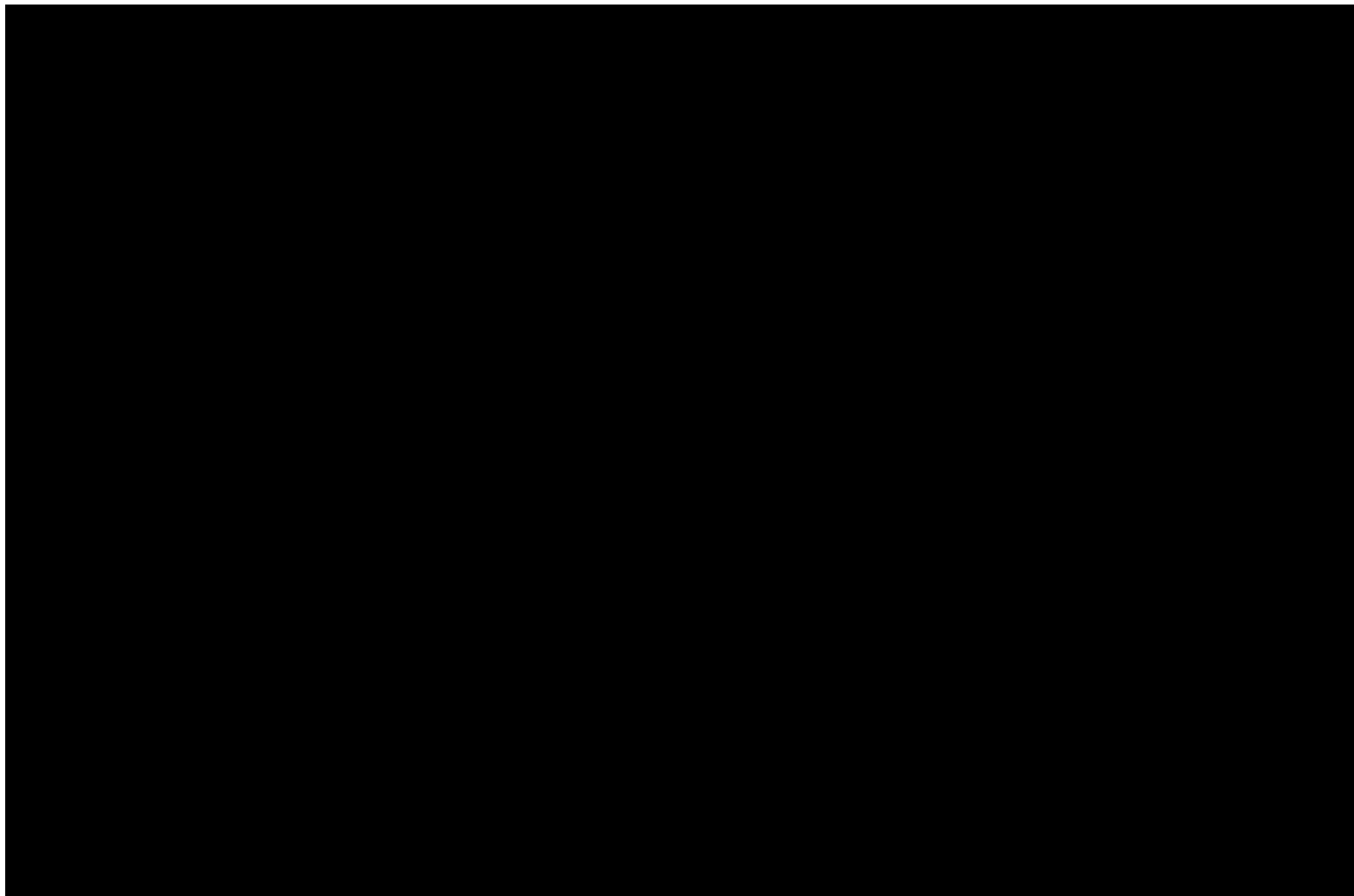
- Legend**
- National Grid Property Holdings Limited land boundary
 - NGPH internal areas
 - SGN retained land
 - Current structures
 - Historical structures (Gas Depot layout, 1991-1999)
 - Historical structures (as labelled, OS maps)
 - Overlaid from Landmark Environment Report, 2017
 - Historical structures (additional IDs/positions, 1930)
 - Historical structures (additional IDs/positions, 1912)
 - Overlaid from National Grid Archive plans (various)
- Site Investigation Locations (Advisian 2021)**
- Monitoring well
 - Monitoring well (refusal)
 - Hand-dug pit
- Previous Site Investigation Locations (Parsons Brinckerhoff, 2011)**
- Trial pit
- Previous Site Investigation Locations (WS Atkins, 2006)**
- Window sample
 - Borehole
 - Trial pit/trench
 - Borehole (unknown)
- Previous Site Investigation Locations (WS Atkins, 2002)**
- Borehole
 - Old borehole
 - Trial pit
 - Window sample
- Previous Site Investigation Locations (Harrison, 1992)**
- Borehole
 - Trial pit
- Previous Site Investigation Locations (SEGAS, 1983)**
- Trial pit
- Drawing References:**
- Overlaid from Portland OS plan courtesy of NGPH

Approximate Site Centre: (527395, 169180)							PROJECT: 08507 WESTERN ROAD, MITCHAM			NATIONAL GRID PROPERTY HOLDINGS LIMITED		
HISTORICAL STRUCTURES AND SITE INVESTIGATION LOCATIONS												
DRAWN BY	STATUS	APPROVER	PAPER SIZE	DATE	SCALE	OFFICE	T +44 (0)117 925 1304			FIGURE 4A		REV

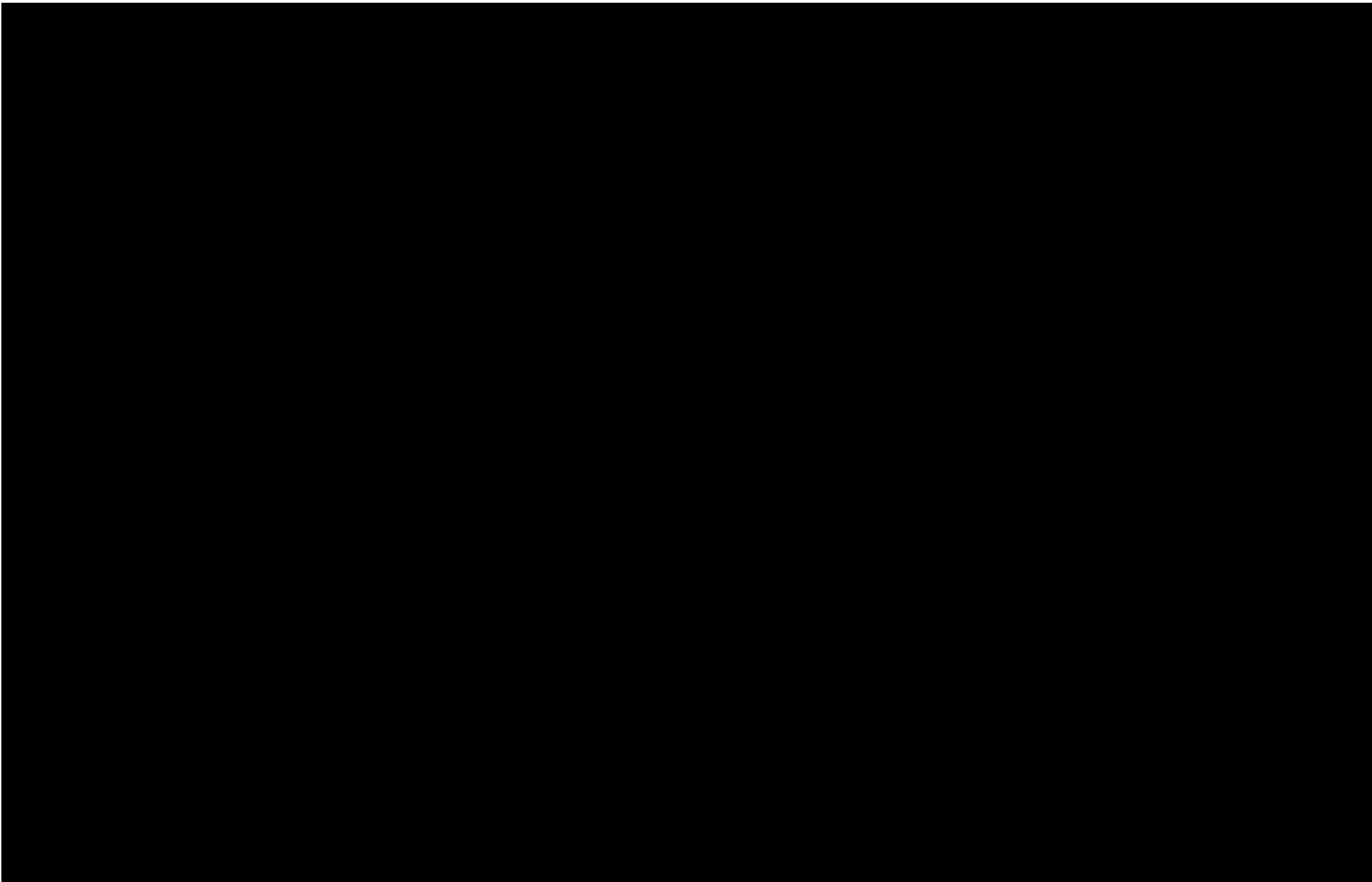
Appendix 3







Appendix 4



Appendix 5

the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million (1990–1999) and is projected to increase by a further 1.5 million by 2010 (Office of National Statistics 2000). The number of people aged 65 and over is projected to increase by 2.5 million by 2020 (Office of National Statistics 2000).

There is a growing awareness of the need to develop strategies to meet the needs of the ageing population. The Department of Health (1999) has identified the need to develop a 'new paradigm' for the care of the elderly. This paradigm is based on the principle of 'active ageing', which is the process of maintaining and enhancing the functional ability of older people to live independently and to participate in social and economic activities. The Department of Health (1999) has identified a number of key areas for action in order to achieve this paradigm, including: (1) promoting the health and well-being of older people; (2) ensuring that older people have access to the services and resources they need to live independently; and (3) ensuring that older people are able to participate in social and economic activities.

One of the key areas for action is the need to develop strategies to promote the health and well-being of older people. This includes the need to develop strategies to prevent the onset of chronic disease and to manage chronic disease when it does occur. The Department of Health (1999) has identified a number of key areas for action in order to achieve this, including: (1) promoting the health and well-being of older people; (2) ensuring that older people have access to the services and resources they need to live independently; and (3) ensuring that older people are able to participate in social and economic activities.

One of the key areas for action is the need to develop strategies to ensure that older people have access to the services and resources they need to live independently. This includes the need to develop strategies to ensure that older people have access to housing, transport, and social services. The Department of Health (1999) has identified a number of key areas for action in order to achieve this, including: (1) promoting the health and well-being of older people; (2) ensuring that older people have access to the services and resources they need to live independently; and (3) ensuring that older people are able to participate in social and economic activities.

One of the key areas for action is the need to develop strategies to ensure that older people are able to participate in social and economic activities. This includes the need to develop strategies to ensure that older people have access to education, training, and employment opportunities. The Department of Health (1999) has identified a number of key areas for action in order to achieve this, including: (1) promoting the health and well-being of older people; (2) ensuring that older people have access to the services and resources they need to live independently; and (3) ensuring that older people are able to participate in social and economic activities.

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the 'information' and 'communication' fields. The 'information' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'communication' field is defined as:

...the study of the processes of communication production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information science' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information studies' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information technology' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information systems' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information management' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information policy' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The 'information law' field is defined as:

...the study of the processes of information production, distribution, access, use and evaluation, and the study of the social, cultural, economic and political contexts in which these processes take place. (p. 10)

The first of these is the *Journal of the American Medical Association* (JAMA), which has been a leading voice in the medical profession for over a century. It is a weekly publication that covers a wide range of topics, from clinical medicine to public health. The second is the *New England Journal of Medicine* (NEJM), which is a leading journal in the field of clinical medicine. The third is the *Lancet*, which is a leading journal in the field of public health. The fourth is the *British Medical Journal* (BMJ), which is a leading journal in the field of clinical medicine. The fifth is the *Annals of Internal Medicine*, which is a leading journal in the field of clinical medicine. The sixth is the *Journal of the American Academy of Pediatrics* (JAAP), which is a leading journal in the field of pediatrics. The seventh is the *Journal of the American Geriatrics Society* (JAGS), which is a leading journal in the field of geriatrics. The eighth is the *Journal of the American Psychiatric Association* (JAPA), which is a leading journal in the field of psychiatry. The ninth is the *Journal of the American Society of Nephrology* (JASN), which is a leading journal in the field of nephrology. The tenth is the *Journal of the American Society of Hypertension* (JASH), which is a leading journal in the field of hypertension. The eleventh is the *Journal of the American Society of Endocrinology* (JASE), which is a leading journal in the field of endocrinology. The twelfth is the *Journal of the American Society of Human Genetics* (JASHG), which is a leading journal in the field of human genetics. The thirteenth is the *Journal of the American Society of Human Immunology* (JASHI), which is a leading journal in the field of human immunology. The fourteenth is the *Journal of the American Society of Human Microbiology* (JASHM), which is a leading journal in the field of human microbiology. The fifteenth is the *Journal of the American Society of Human Pathology* (JASHP), which is a leading journal in the field of human pathology. The sixteenth is the *Journal of the American Society of Human Physiology* (JASHPH), which is a leading journal in the field of human physiology. The seventeenth is the *Journal of the American Society of Human Pharmacology* (JASHPH), which is a leading journal in the field of human pharmacology. The eighteenth is the *Journal of the American Society of Human Toxicology* (JASHHT), which is a leading journal in the field of human toxicology. The nineteenth is the *Journal of the American Society of Human Nutrition* (JASHHN), which is a leading journal in the field of human nutrition. The twentieth is the *Journal of the American Society of Human Development* (JASHHD), which is a leading journal in the field of human development. The twenty-first is the *Journal of the American Society of Human Education* (JASHHE), which is a leading journal in the field of human education. The twenty-second is the *Journal of the American Society of Human Psychology* (JASHHP), which is a leading journal in the field of human psychology. The twenty-third is the *Journal of the American Society of Human Sociology* (JASHHS), which is a leading journal in the field of human sociology. The twenty-fourth is the *Journal of the American Society of Human Anthropology* (JASHHA), which is a leading journal in the field of human anthropology. The twenty-fifth is the *Journal of the American Society of Human Linguistics* (JASHHL), which is a leading journal in the field of human linguistics. The twenty-sixth is the *Journal of the American Society of Human Musicology* (JASHHM), which is a leading journal in the field of human musicology. The twenty-seventh is the *Journal of the American Society of Human Art History* (JASHHA), which is a leading journal in the field of human art history. The twenty-eighth is the *Journal of the American Society of Human Literature* (JASHHL), which is a leading journal in the field of human literature. The twenty-ninth is the *Journal of the American Society of Human Philosophy* (JASHHP), which is a leading journal in the field of human philosophy. The thirtieth is the *Journal of the American Society of Human Religion* (JASHHR), which is a leading journal in the field of human religion. The thirty-first is the *Journal of the American Society of Human Law* (JASHHL), which is a leading journal in the field of human law. The thirty-second is the *Journal of the American Society of Human Economics* (JASHHE), which is a leading journal in the field of human economics. The thirty-third is the *Journal of the American Society of Human History* (JASHHH), which is a leading journal in the field of human history. The thirty-fourth is the *Journal of the American Society of Human Geography* (JASHHG), which is a leading journal in the field of human geography. The thirty-fifth is the *Journal of the American Society of Human Political Science* (JASHHPS), which is a leading journal in the field of human political science. The thirty-sixth is the *Journal of the American Society of Human Social Science* (JASHHSS), which is a leading journal in the field of human social science. The thirty-seventh is the *Journal of the American Society of Human Environmental Science* (JASHHES), which is a leading journal in the field of human environmental science. The thirty-eighth is the *Journal of the American Society of Human Earth Science* (JASHHES), which is a leading journal in the field of human earth science. The thirty-ninth is the *Journal of the American Society of Human Space Science* (JASHHSS), which is a leading journal in the field of human space science. The fortieth is the *Journal of the American Society of Human Oceanography* (JASHHO), which is a leading journal in the field of human oceanography. The forty-first is the *Journal of the American Society of Human Atmospheric Science* (JASHHAS), which is a leading journal in the field of human atmospheric science. The forty-second is the *Journal of the American Society of Human Planetary Science* (JASHHPS), which is a leading journal in the field of human planetary science. The forty-third is the *Journal of the American Society of Human Interplanetary Science* (JASHHIPS), which is a leading journal in the field of human interplanetary science. The forty-fourth is the *Journal of the American Society of Human Interstellar Science* (JASHHIS), which is a leading journal in the field of human interstellar science. The forty-fifth is the *Journal of the American Society of Human Interuniversal Science* (JASHHIS), which is a leading journal in the field of human interuniversal science. The forty-sixth is the *Journal of the American Society of Human Interdimensional Science* (JASHHIS), which is a leading journal in the field of human interdimensional science. The forty-seventh is the *Journal of the American Society of Human Interhyperspace Science* (JASHHIS), which is a leading journal in the field of human interhyperspace science. The forty-eighth is the *Journal of the American Society of Human Interdimensional Hyperspace Science* (JASHHIS), which is a leading journal in the field of human interdimensional hyperspace science. The forty-ninth is the *Journal of the American Society of Human Interdimensional Hyperspace Interuniversal Science* (JASHHIS), which is a leading journal in the field of human interdimensional hyperspace interuniversal science. The fiftieth is the *Journal of the American Society of Human Interdimensional Hyperspace Interuniversal Interdimensional Science* (JASHHIS), which is a leading journal in the field of human interdimensional hyperspace interuniversal interdimensional science.

Appendix 6

100

[The following text is a dense, continuous block of illegible characters and symbols, likely representing a corrupted scan of a document page. It contains no discernible words or structure.]

From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 07 February 2023 16:32
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Mitcham Gasworks - 22/P3620

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Hello [REDACTED]

Thanks for confirming.

In relation to the proposed development, the Fire Strategy sets out the heights of each block at Table 1, and confirms that they are all below 30m and as such this development falls below the emerging requirements for two staircases. I did however wish to clarify the approach with you to ensure that we are taking the right measurements. Thank you for the update in relation to the referral, I have spoken to Jonathan today and I understand that the referral is imminent.

Kind regards,



[REDACTED]
Planning Associate
MTCP MRTPI

T +44 (0) [REDACTED]

70 Chancery Ln
Holborn
London
WC2A 1AF

wsp.com

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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 07 February 2023 14:51
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Mitcham Gasworks - 22/P3620

Hi [REDACTED]

I have downloaded the files but have still yet to receive the referral from Merton. I will let you know once it comes through and is allocated.

Yes – that is correct. The 30 metre height is to the finished floor level of the uppermost storey with habitable rooms. Does this issue apply to your development?

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL

[REDACTED] london.gov.uk

079 [REDACTED]

london.gov.uk

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 07 February 2023 10:53
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Mitcham Gasworks - 22/P3620

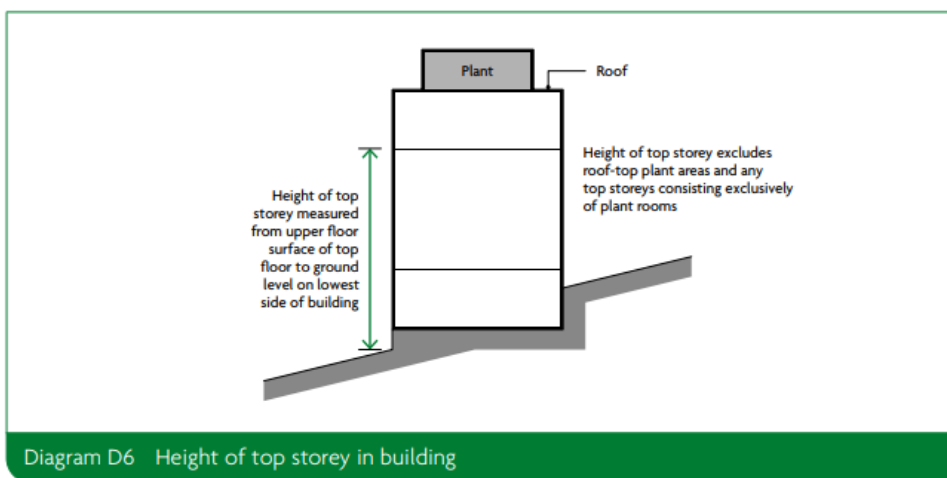
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Hello [REDACTED]

Hopefully you received my email from last week and were able to download the documentation for the Mitcham Gasworks application. Please can you confirm whether you have received the formal referral of the application and that you have all the documentation required for a valid referral?

I just also wanted to double check the position that the GLA are taking following the Building Regulations Fire Safety Approved Document B consultation in December.

My understanding is that the Mayor is not accepting proposals being referred that include residential buildings over 30m in height with a single staircase. The 30 metres trigger is to be measured from the upper floor surface of the top floor to ground level on the lowest side of the building (excluding roof top plant and any storeys consisting exclusively of plant rooms), as illustrated in Diagram D6 from Approved document B:



Please can you confirm this position and clarify whether this is the approach the GLA are taking to measure the distance?

Kind regards,

wsp

[REDACTED]
Planning Associate
MTCP MRTPI

T +44 (0) [REDACTED]

70 Chancery Ln
Holborn
London
WC2A 1AF

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From: [REDACTED]
Sent: 03 February 2023 12:24
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: Mitcham Gasworks - 22/P3620

Hello [REDACTED]

I am emailing further to our telephone conversation. As discussed, the planning application for the redevelopment of Mitcham Gasworks has been validated by LB Merton.

I understand that you have heard from LB Merton with regards to the GLA referral and expect the formal referral to be made very shortly.

The application documents can be found on the Council's website [here](#).

I thought it might also be useful to provide you with a WeTransfer link to the submission as well: <https://we.tl/t-wSIKfy8eyU>

Please do let me know if you have any questions in relation to the submission, and I would be happy to talk the application through with you, should this assist.

Kind regards,



[Redacted]

Planning Associate
MTCP MRTPI

T +44 (0) [Redacted]

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London
WC2A 1AF

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[REDACTED]

From: [REDACTED]
Sent: 15 June 2022 12:38
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

Thanks for sending this through. The following GLA staff will be attending tomorrow:

[REDACTED] – Strategic Planner, GLA
[REDACTED] – Team Leader – Development Management, GLA
[REDACTED] – Senior Urban Designer, GLA
[REDACTED] – Energy Officer, GLA

I'm happy for you to lead the meeting and we will be available to answer your questions and provide feedback in the discussions.

I look forward to speaking with you all tomorrow.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATER LONDON AUTHORITY
169 Union Street, London SE1 0LL
[REDACTED] [london.gov.uk](https://www.london.gov.uk)
079 [REDACTED]

[london.gov.uk](https://www.london.gov.uk)

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 15 June 2022 06:57
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

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Hi [REDACTED]

I've set out a draft agenda and list of attendees below. We are double checking who is attending from Merton's side but it should be those listed below with maybe another, but to be confirmed. Please confirm who is attending from your side.

On the suggested agenda, note that we haven't got anything related to affordable housing. As noted in our response document, this is still subject to further consideration and discussion with Merton and the prospective registered provider. We also don't have anything specifically transport related, but access, parking and crossings are covered under the layout points, with some detail on this in the updated design pack.

Let me know if you have any comments on the agenda.

Attendees:

[REDACTED] – GLA
[REDACTED] – GLA
[REDACTED] Meaden – GLA
[REDACTED] – Merton
[REDACTED] - Merton
[REDACTED] – St William
[REDACTED] St William
[REDACTED] – Rolfe Judd
[REDACTED] – Rolfe Judd
[REDACTED] – Gillespies
[REDACTED] - Hodkinson
[REDACTED] – Iceni
[REDACTED] - WSP
[REDACTED] - WSP

Draft agenda:

1. Introductions
2. Update
3. Design
 - a. Presentation
 - b. Discussion around:
 - i. Density
 - ii. Layout, access and routes
 - iii. Ground floor
 - iv. Landscaping
 - v. Height and massing including tall buildings
 - vi. Appearance
 - vii. Residential quality
4. Sustainability
 - a. Presentation
 - b. Discussion
5. Next steps

Regards

[REDACTED]
[REDACTED]
Planning Director

The logo for WSP, consisting of the letters 'wsp' in a stylized, lowercase, red font.

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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 14 June 2022 13:39
To: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

Thanks for sending all that through. We will review and discuss with you on Thursday.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATER LONDON AUTHORITY
169 Union Street, London SE1 0LL
[REDACTED]@london.gov.uk
079 [REDACTED]

london.gov.uk

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 14 June 2022 12:17
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

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Hi [REDACTED]

Further to my email below with the link to the design and sustainability presentations, I also attach a summary note which sets out an update on some of the key comments from the GLA pre-app letter, as well as summarising the key changes that have been made to the scheme.

For reference, I also attach the Statement of Common Ground between the GLA and Merton which now refers to buildings of up to 10 storeys on the Mitcham Gasworks site.

Hope this is helpful, but let me know any queries.

Regards


Planning Director



WSP House, 70 Chancery Lane, London, WC2A 1AF

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From: 
Sent: 14 June 2022 07:23
To:  <@london.gov.uk>;  <@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

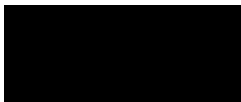
Hi 

Please find below a link to the updated design presentation and a energy/sustainability presentation. Let me know if you have any issues accessing the documents. Look forward to discussing with you on Thursday.

<https://we.tl/t-XtwfOMSCJx>

Regards


Planning Director



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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 10 June 2022 14:18
To: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

Thanks for letting me know. Send it through to me on Monday and I will let you know if there's any issues with the time it will take to review then.

Have a good weekend.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[REDACTED]@london.gov.uk
079 [REDACTED]

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 10 June 2022 13:58
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

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Hi [REDACTED]

We were hoping to get the updated design pack over to you today, but unfortunately due to absences the visualiser producing the scheme images is not around but will be back in on Monday. Can we provide you the updated pack by end of the day on Monday? This leaves two full days to review ahead of the meeting on Thursday. The alternative is that we release the pack without the images by end of the day today, but I think it would be cleaner to issue one version on Monday. Is that ok with you?

Regards

[REDACTED]
Planning Director



[REDACTED]
4

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From: [REDACTED]
Sent: 08 June 2022 17:07
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

Yes, we'll be providing an updated design pack. This is being pulled together and we should be able to send across to you on Friday so you can review before next week's meeting.

Regards

[REDACTED]
Planning Director



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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 June 2022 14:56
To: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED] and [REDACTED]

I hope you're both well.

Just ahead of our meeting next week, I was just wondering if you were going to provide a design pack for us to review beforehand.

Kind regards,

██████████
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
██████████ [london.gov.uk](https://www.london.gov.uk)
079 ██████████

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From: ██████████
Sent: 30 May 2022 15:28
To: ██████████ <██████████@wsp.com>; ██████████ <██████████@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi ██████████

I can confirm we are available to meet on 16 June. I will make sure an energy colleague is in attendance.

Kind regards,

██████████
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
██████████ [london.gov.uk](https://www.london.gov.uk)
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From: ██████████ <██████████@wsp.com>
Sent: 30 May 2022 11:25
To: ██████████ <██████████@london.gov.uk>; ██████████ <██████████@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

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Hi ██████████

Hope you're well. Just picking up from ██████████ on the next pre-app meeting.

Can you confirm that 16 June is agreed? We are just getting confirmation on attendance from the local authority side. We do want a discussion on energy so would be good to involve your energy colleague.

Regards

██████████
Planning Director



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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 24 May 2022 17:28
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

Thanks for confirming. I will invite an energy colleague. I forgot to check – do you need TfL?

If you could let me know who from the LPA would be attending and who from your side will be attending also.

I look forward to receiving your design pack. It will be good to get it at least one week before the meeting so we have enough time to review and prepare.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
[REDACTED]@london.gov.uk
079 [REDACTED]

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 24 May 2022 16:05
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: 2022/0231 - Mitcham Gasworks

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Hi [REDACTED]

Well thanks, I hope you are too.

Thanks for reaching out. We are just confirming team availability for the 16 June but I'm sure we can make this work. In terms of colleagues, we won't have the detail for the viability discussion so I would suggest not to reach out to officers on this point, however a sustainability representative would be really useful and we can share our emerging strategy.

We would like the LPA to join this session, yes – let me know if you want contact details for the officers we have been dealing with?

We will be submitting a response to your pre-application comments and we will have an updated design pack and views to share as well. I'll come back to you on timescales for this but we will aim to ensure you have enough time to review ahead of our meeting date.

Best regards,

[REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 24 May 2022 06:34

To: [REDACTED] <[REDACTED]@wsp.com>

Subject: 2022/0231 - Mitcham Gasworks

Hi [REDACTED]

I hope you're well.

I just wanted to confirm what you would like to discuss in the upcoming pre-app meeting. Did you need my energy or viability colleagues to come along, or is it just urban design?

Can you also provide a list of attendees and confirm whether you would like the LPA to attend? Can you also let me know if you would be submitting any further information before the meeting?

Kind regards,

[REDACTED]

Strategic Planner – Development Management

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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RESPONSE TO GLA

Topic	GLA comment	Response
Principle of development	Support for residential led redevelopment and support for social infrastructure.	Proposed development remains a residential-led redevelopment. Flexible commercial/community space is proposed as part of the mix of uses.
Site density and capacity	<p>The site allocation has an indicative site capacity of 200-400 homes which is far lower than the 700 homes proposed.</p> <p>Any application will need to demonstrate a design-led approach to optimising site capacity, meeting the requirements of part D of Policy D3, especially in relation to the impacts of tall buildings, infrastructure capacity and the development's context and form.</p> <p>Notwithstanding this, it is noted that Policy D3 of the London Plan states that higher density developments should be promoted in well-connected locations. The site has a PTAL of between 2 and 4 which indicates a good level of connectivity.</p>	<p>Statement of common ground with LB Merton now confirms that the draft allocation identifies an indicative capacity of 650 homes. The proposed number of homes has reduced to c.650 and aligns with the draft allocation.</p> <p>Townscape, heritage, environmental and residential quality indicators demonstrate that the proposed density is appropriate and the proposal appropriately optimises the capacity of the site.</p>
Affordable housing	<p>Given the site is former industrial land, the strategic target of 50% affordable housing would apply. However, if the site is considered a surplus utility site, it is recognised there may be substantial decontamination, enabling and remediation costs. If these costs are significant, then a 35% affordable housing threshold can be applied, subject to viability evidence.</p> <p>A 35% affordable housing could meet the fast track route subject to abnormal costs being demonstrated and the proposed tenure split meeting GLA and Council requirements. If</p>	The affordable housing position is still being assessed in the context of scheme changes, scheme viability and discussions with both Merton and local registered providers.

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	<p>agreed, an early stage review would be required, but not a late stage review.</p> <p>A fee of £5,000 would apply for the review of the abnormal costs.</p> <p>In order to fully qualify for the Fast Track Route, the applicant should demonstrate that it has considered the use of grant to increase the affordable housing offer beyond the 35% threshold.</p>	
Housing choice	<p>The applicant has not provided details on housing mix but should engage with the Council to ensure that sufficient family-sized housing is provided</p>	<p>The proposed mix comprises approximately:</p> <p>275 x 1 - beds (42%)</p> <p>350 x 2 - beds (54%)</p> <p>25 x 3 - beds (4%)</p> <p>Family homes have been concentrated in the social rent tenure, and the mix within this tenure closely matches the target mix. Further details on breakdown by tenure will be provided.</p>
Playspace	<p>The quantum of play space provision should be further clarified given the expected requirements for c.700 dwellings is sizeable.</p>	<p>The current landscaping design incorporates c.1,600 sqm of children's playspace catering for 0-4 years, 5-11 years and 12+ years.</p> <p>The precise playspace requirement will be determined by the agreed tenure mix, which is subject to further discussion.</p>
Design review	<p>Developments which exceed 350 units per hectare or 30 metres in height, must undergo at least one design review, or demonstrate that they have undergone a local borough process of design scrutiny. Further information on this should be made available to GLA officers as part of any formal application.</p>	<p>The scheme has been through one round of review with Merton's Design Review Panel. The comments from this review have, along with other consultation comments, informed the evolution of the scheme. A further review session is due to take place next week. The Design and Access Statement will set out how the evolution of the design scheme has been informed by the design review process.</p>

MITCHAM GASWORKS

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<p>Tall buildings</p>	<p>The proposed development includes buildings of between 5-13 storeys.</p> <p>The draft local plan does not identify specific suitable locations for tall buildings outside of Merton's town centres. As part of the consultation process for the draft local plan, the GLA has made a submission to the Council to advise it is not in general conformity with the London Plan and the draft plan should be amended to identify specific locations where tall buildings are acceptable.</p> <p>Future townscape analysis should consider long range views, mid range views and immediate views.</p> <p>Officers query whether the tallest element is in the most appropriate location – it may be better located pushed towards Western Road (where the current 7 storey element is) where the impact on context is minimised and yet it is prominent from the main road – acting as a distinctive landmark to the local community en route towards Mitcham Town Centre.</p>	<p>Updates have been made to Merton's draft policy on tall buildings and to the draft site allocation for the Mitcham Gasworks site. Through the Statement of Common Ground on changes to the wording of these policies, the draft policy and the site allocation now specifically identify the Mitcham Gasworks site for tall buildings, with heights of up to 10 residential storeys (along with the replacement of telecoms equipment on the tallest building).</p> <p>The GLA have also signed a Statement of Common Ground with LB Merton for heights up to 10 storeys within the site allocation.</p> <p>An initial townscape assessment of long, mid range and immediate views has informed the amendments to the massing.</p> <p>The tallest building has reduced to 10 storeys, which aligns with the proposed heights in Merton's draft local plan.</p> <p>An analysis of the location of the tallest building has been undertaken, including testing on Western Road. Through this analysis and through discussions with Merton, it is considered that the centre of the site is the most appropriate location for a taller element of 10 storeys.</p> <p>The scale of some of the buildings around the edges of the site has also been reduced, with the buildings on Western Road reducing to 7 storeys, and the buildings along Field Gate Lane also reducing in height.</p>
<p>Other assessments</p>	<p>The applicant should work with the Council to ensure that any aviation or</p>	<p>All of these assessments will form part of the planning application. The evolution</p>

MITCHAM GASWORKS

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	<p>telecommunication impacts arising from the development are suitably addressed.</p> <p>A fire statement will also be required.</p> <p>The applicant will need to carry out wind microclimate assessment and daylight and sunlight assessments which assess the impact on surrounding buildings. Wind studies should be undertaken, particularly in areas of the public realm, footpaths, balconies and rooftops.</p>	<p>of the design has been informed by technical advice on fire, wind, daylight, sunlight and overshadowing.</p> <p>There is 93% pass for ADF internal daylight.</p> <p>All amenity areas exceed BRE standards for sun on the ground.</p>
Connection to open space	<p>Dialogue with Barratt Homes should continue regarding the open space interface on the south-western boundary of the site.</p> <p>Improving the connection to this underutilised green infrastructure (whilst overcoming the minor topographic change) would have a notable positive impact on the overall scheme.</p>	<p>There have been positive discussions with Barratt Homes. An agreement on opening up a connection has not yet been finalised but is agreed in principle and the proposed design has responded to allow for a future connection.</p>
Pedestrian routes	<p>To the north-east, there is an existing pedestrian crossing on Western Road in the northern corner of the site towards the Asda superstore as well as another in the eastern corner of the site.</p> <p>The two proposed through site links appear to terminate at dead end conditions at their northern ends</p>	<p>Further work has been undertaken to understand the desire lines and the role that new routes through the site can play in opening up the permeability.</p> <p>It is proposed to relocate the informal pedestrian crossing on Western Road to better align with the route through the site. The existing zebra crossing will remain in place.</p>
Western Road frontage	<p>The residential interface with Western Road with no setback is questioned. This condition does not exist elsewhere along the street (in close proximity) and is therefore out of character - other properties further along the street have a street setback in the form of a front garden. It is noted that these dwellings are likely to be replaced with non-residential uses which is supported.</p>	<p>Non-residential uses have been introduced along the ground floor on Western Road. Where residential is found along Western Road, it has a generous set back and front garden.</p>

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DATE:

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Nursery boundary	Regarding the nursery location with its associated private open space: nurseries often have high opaque barriers which may not positively contribute to improving the openness of the Field Gate Lane footpath at its eastern end.	This space is now proposed as a flexible commercial/community space.
Vehicle access	Vehicular infrastructure appears to dominate the public realm. It occupies a significant portion of the northern end of the north-west to south-east link. An alternative approach could consider the removal of the access road and instead provide direct access into each of the podium car parks. This should not result in the loss of significant floorspace	Through further discussions with the refuse team at Merton, we have moved to a managed refuse solution for Blocks B, C and D, which means that it is no longer necessary for a refuse vehicle to drive through the centre of the site. This allows the road through the site to be reduced in width and to be designed in a way that complements the landscaping vision. The option for providing direct vehicular access from Portland Road into the podium car parks was tested but not taken further as it would result in a loss of parking on Portland Road and reduced active frontages in a location where new street frontage is desired.
Public realm	there is currently an extremely high demand for street level external space, with the current rather limited quantum of high-quality public realm potentially a symptom of overdevelopment	The public realm and landscaping design has progressed, with more green and amenity space introduced.
Drainage	The treatment of the external hard landscaped areas should carefully consider the permeability of surface finishes. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features	The drainage strategy is being developed in conjunction with advice from Merton.

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Dual aspect	<p>Applications should maximise the provision of dual aspect units, avoiding north facing single aspect units.</p> <p>There are a high number of north-east and north-west facing dwellings as well as extensive single-aspect dwellings include some that are north facing</p>	<p>The proportion of dual aspect homes has increased to 61%. The number of single aspect north facing homes has been significantly reduced through design development.</p> <p>There is 93% pass for ADF internal daylight.</p>
Accessible homes	<p>The applicant would provide 10% of the rooms as wheelchair accessible, which would be acceptable. The future application should include plans that show where the wheelchair accessible homes would be located and how many there would be. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled.</p>	<p>Details on wheelchair accessible homes will be provided in the planning application.</p>
Energy	<p>Requirements from the London Plan relating to net zero carbon, the energy hierarchy, whole life carbon assessment and circular economy</p>	<p>The application will be supported by the required documentation. Please refer to the presentation material from Hodkinson.</p>
Urban greening and biodiversity	<p>The applicant must calculate the Urban Greening Factor score as set out in Policy G5 of the London Plan and seek to achieve the specified target prior to the Mayor's decision-making stage. A landscaping plan should also be provided.</p> <p>Policy G6 of the London Plan states that there should be a biodiversity net gain on all development sites</p>	<p>The urban green calculation is provided within the updated design pack. The current landscaping design achieves an urban greening factor of 0.357.</p> <p>Net biodiversity gain is estimated at 12%.</p>
Air quality	<p>If the development is subject to the EIA regulations, the development proposal must consider the air quality positive approach in line with Policy SI1(C) of the London Plan and an Air Quality Positive Statement will be required.</p>	<p>Draft EIA screening confirms no EIA required.</p> <p>An air quality assessment will be submitted, including an air quality neutral assessment.</p>

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DATE:

14 June 2022

SUMMARY OF SCHEME CHANGES

Topic	Key Scheme Changes & Review
Movement, routes and access	<ul style="list-style-type: none"> • Move to a more street based layout • Location of vehicle access on Western Road is located to improve visibility and safety (poor visibility and across from Sadler Close entrance) • Introduction of Tiger Crossing on Western Road at the entrance to the site creates clear desire lines across the site • Move to a managed refuse arrangement to ensure that refuse vehicles do not have to travel through centre of site • Reduction in width and use of internal roads through site • Access into Portland Road podiums from inside site to maximise active frontages and minimise parking loss on Portland Road
Relationship of ground floor to routes and spaces	<ul style="list-style-type: none"> • Introduction of more front doors at ground floor • Relocation of block entrances from Portland Road to within the scheme to provide new front doors and street to Portland Road • Introduction of dual-access units with gardens and patio doors, with a mixture of walls and hedging to provide element of privacy but retain openness/surveillance • Review of optimal location of non-commercial uses to best respond with the surrounding context and routes through the site • Relocation of family units to ground floor to benefit from front garden provision
Quality and variety of landscape spaces	<ul style="list-style-type: none"> • Relocation of central road to provide a more consolidated central landscaped area • Introduction of more variety in character of landscape spaces • Inclusion of wildflower planting adjacent to Field Gate Lane to complement the wilder landscaping of the Community Orchard • Closure of route adjacent to retained central pressure reduction system to aid with legibility of routes around the site • Increased planting around the central PRS, creating a single dominant route and more biodiverse centre
Massing and relationship with	<ul style="list-style-type: none"> • Further setting back of heights along Portland Road

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context, including tall buildings	<ul style="list-style-type: none"> • Reduction in heights along Field Gate Lane • Simplified stepping in heights from lower heights at site edges to taller elements in the centre • Reduction in heights on Western Road to a maximum of 7 storeys • Realignment of blocks to respond to Western Road and Portland Road • Realignment of buildings and new street off Portland Road to create a parallel entrance street • Breaking up of buildings to increase articulation and improve the quality of accommodation • Reduction in height of tallest blocks from 13 storeys to 10 storeys • Redistribution of height profile to respond to townscape views • Reorientation of massing to improve vistas, street alignment and create clear ends to these
Appearance	<ul style="list-style-type: none"> • Design progression of facades to provide subtle hints to the historic lattice design of the gasholders • Introduction of warehouse style facades to reflect the historic buildings and use on site • Clear grouping and identity of buildings to articulate massing and provide separation between proposed blocks • Introduction of pitched parapets in some locations to introduce visual interest and articulation to mid height buildings
Residential quality and amenities	<ul style="list-style-type: none"> • Introduction of more breaks and articulation in the massing to increase the number of dual aspect homes (up to 61%) and improve daylight to homes • Reduction in height of some blocks adjacent to Field Gate Lane to reduce daylight impacts on existing properties to south • Further setbacks along Portland Road to reduce impact on homes to the north • Shifts in massing of Blocks F to maximise sunlight to podium amenity spaces • Introduction of breaks in blocks A, E and F to improve dual aspect, minimise north facing single aspect and improve internal daylight
Commercial Space	<ul style="list-style-type: none"> • Improvements to community use layout at the corner of Western Road and Field Gate Lane. • Introduction of a café in response to community engagement adjacent to ASDA and the bus stop



MITCHAM GASWORKS

DATE: 14 June 2022

Parking	<ul style="list-style-type: none">• Incorporation of car club spaces• Agreed parking provision at both a local and TfL level
---------	---

Statement of Common Ground on Conformity with the London Plan

May 2022

1. Parties Involved and background

- The Mayor of London / Greater London Authority
- The London Borough of Merton

- 1.1. Officers from the Greater London Authority (GLA) and the London Borough of Merton have worked together throughout Merton's Local Plan process. This includes:
- On preparations for the London Plan 2021, including London's Strategic housing market assessment 2017, Town Centre Health Checks and other supporting evidence
 - On an ongoing basis on monitoring developments: the delivery of new homes and other strategic policy matters via LB Merton's input into the London Development Database, hosted by the GLA
 - Directly on Merton's Local Plan, including the GLA's response to Stage 2, stage 2a (both Reg18) and Stage 3 (Reg19) ongoing dialogue via email and telephone and meetings, most recently on 25th January 2021, 25th March 2021 and 6th October 2021

2. Context / Need for a Statement of Common Ground

- 2.1. The Mayor of London issued an Opinion of General Conformity on 6 September 2021, which stated that Merton's new Local Plan Publication Stage 3 was not in general conformity with the London Plan 2021 (LP2021), for the following reason relating to tall buildings:

"As currently written the draft Plan doesn't identify on maps, locations which are considered suitable for tall buildings and nor have appropriate/maximum building heights been set out within those areas."

- 2.2. This Statement of Common Ground aims to address those concerns.

3. The Mayor of London Proposed solutions

- 3.1. The Mayor proposed solutions to address these conformity issues:

"In order to bring the draft Plan into general conformity with the LP2021, the draft Plan:

- *Should clearly identify on maps, suitable locations for tall buildings,*
- *Should not support proposals for tall buildings outside of those locations, and*
- *Should set out appropriate/or a range of appropriate building heights in specific locations"*

4. Proposed Modifications to address Conformity Issues

- 4.1. To address the conformity issues with the London Plan 2021, both parties agree to recommend the following modifications to the Planning Inspector where these relate to tall buildings:
- a) Policy D12.6 (tall buildings)
 - b) Policy N3.1 (Colliers Wood),
 - c) Policy N5.1 (Morden), to the policy's supporting text and to Site Allocation Mo1 (Morden Regeneration Zone),
 - d) Policy N9.1 (Wimbledon)
 - e) site allocations Mi1 (Benedict's Wharf) Mi16 (Mitcham Gasworks) RP3 (Tesco Burlington Road) and Wi12 Wimbledon Stadium

(a) Recommended main modification to policy D12.6 (tall buildings)

Policy D12.6 Tall buildings

~~Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan. Tall buildings in the borough are defined as a minimum of 21m in height from the ground level to the top of the uppermost storey.~~

.....

~~Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.~~

1. Tall buildings are only acceptable in the following locations:
 - a) As indicated in the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre
 - b) Wimbledon town centre, as set out within the chapter on Wimbledon and the Future Wimbledon supplementary planning document,
 - c) Morden Regeneration Zone, as set out within the chapter on Morden
 - d) Colliers Wood, as set out within the chapter on Colliers Wood
 - e) As set out within Merton's adopted Estates Local Plan 2018 for Eastfields and High Path estates.
 - f) Where they are identified within the relevant site allocations: CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.
2. The council will generally support tall buildings in those locations set out in part 1 of this policy where:
 - g) Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine local character and heritage assets and their settings through townscape analysis of short, mid and long views.
 - h) ...

The Strategic Heights Diagrams referred to in part-r of draft policy D12.6 are attached in Appendix 1.

Appendix 4 to this document shows a consolidated version of all the proposed modifications to Policy D12.6 *Tall buildings*. The majority of proposed modifications, as illustrated in **red text** are set out in submitted document OD4, OD4a and OD4b. Further modifications for clarity and in line with the ongoing dialogue with the GLA post submission in December 2021 are proposed in **purple text**

(b) Recommended main modifications to Policy N3.1 (Colliers Wood)

COLLIERS WOOD: POLICY N3.1

- g. Supporting tall buildings within Colliers Wood town centre in accordance with the details in the Strategic Heights Diagram for Colliers Wood town centre and the requirements in Policy D12.6 Tall Buildings.

(c) Recommended main modifications to Policy N5.1 (Morden) to the policy's supporting text and to Site Allocation Mo1 (Morden Regeneration Zone),

MORDEN: POLICY N5.1

- e. Supporting tall buildings within the Morden Regeneration Zone in accordance with the details in the Strategic Heights Diagram for the Morden Regeneration Zone and the requirements in Policy D12.6 Tall Buildings ~~and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment.~~

Appendix 2 to this document shows the proposed modifications to the supporting text to draft policy N5.1 that ensure the removal of all references to the appropriateness of tall buildings outside of the Morden Regeneration Zone (Site Allocation Mo1)

Appendix 3 to this document shows the proposed modifications to Site allocation Mo1 (in Morden)

(d) Recommended main modifications to Policy N9.1 Wimbledon

WIMBLEDON: POLICY N9.1

- e. Supporting tall buildings within Wimbledon town centre in accordance with the details in the Strategic Heights Diagram for Wimbledon town centre, the requirements in Policy D12.6 Tall Buildings and the Future Wimbledon Supplementary Planning Document (SPD).

(e) Recommended main modifications to all sites within Wimbledon town centre

Cross referencing all the sites within Wimbledon town centre to the Strategic Heights Diagram:

The Main Modification below is proposed to all relevant site allocations within Wimbledon town centre (Wi2; Wi5 Wi6; Wi9; Wi11; Wi13; Wi15 and Wi16) to ensure that each cross-refers to the Strategic Heights Diagrams.

Approach to tall buildings - ~~Development of the site could include taller buildings subject to consideration of impact on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters having regard to the Future Wimbledon SPD~~

The Strategic Heights Diagram for Wimbledon Town centre in D12.6 “Tall Buildings” sets out the height limits for this site.

All building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 “Ensuring high quality design for all developments”, D12.5 “Managing heritage assets” and D12.6 “Tall Buildings” and have regard to the Future Wimbledon SPD.

(f) Recommended main modifications to site allocations Mi1(Benedict Wharf); Mi16 (Mitcham Gasworks) RP.3 (Burlington Road) and Wi12 (Wimbledon Stadium)

Mi1 Benedict’s Wharf

Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings of up to 10 storeys subject to consideration of design policies.

Mi16 Mitcham Gasworks

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 10 storeys subject to consideration of design policies, along with a replacement telecoms mast on top of the tallest building. ~~impacts on existing character, heritage and townscape.~~

RP3 Burlington Road

Approach to tall buildings: The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings up to 15 storeys subject to consideration of design policies.

Wi12 Wimbledon Stadium

Approach to tall buildings: Development of the site could include taller buildings of up to 10 storeys subject to consideration of impact on existing character and townscape in accordance with policies D12.3 “Ensuring high quality design for all developments” and D12.6 “tall buildings”.

(g) Recommended Main Modification to removed use of words like taller / tallest where this does not improve the clarity of the plan.

Examples can be seen above for Sites Mi1 etc and elsewhere in the Plan, for example:

Approach to tall buildings: The size of the site allows for a masterplanned approach which could contain taller buildings

5. Housing

- 5.1. The Mayor of London issued an opinion on general conformity on 6th September 2021 which with regards to Merton’s Local Plan Publication Regulation 19 Stage 3 housing policies states:

“The Mayor welcomes the close working between GLA and Merton officers which has led to positively addressing a number of concerns raised in his earlier response. This included Merton’s earlier proposed approach to affordable housing, Build to Rent housing and housing numbers. These elements of the draft Plan have been amended and incorporated into this version of the draft Plan. They are now consistent with the LP2021.”

“The draft Plan has been positively amended in light of the Mayor’s most recent comments related to housing and these are noted and welcomed.”

- 5.2. Whilst the Mayor raised no issues on conformity regarding Merton’s new Local Plan Publication Stage 3 housing policies, the Mayor did propose a number of specific suggestions to improve clarity. At a Duty to Co-Operate meeting held on 6th October 2021 between the GLA and Merton officers, these suggestions, together with the proposed additional modifications set out in this Statement of Common Ground, were discussed and agreed by both parties.

Proposed additional modifications to address the Mayor's suggestions

- 5.3. *Mayor's suggestion:* The draft Plan could be clearer on what actions Merton would take in the event of under delivery.
- 5.4. *Merton's response:* we have recommended additional modification AM11.11 to the Planning Inspectors to improve clarity.

AM 11.11

Paragraph 11.2.9

Merton's housing trajectory is supported by Merton's Housing Delivery Test Action Plan which includes details on the actions we can take **in the event of under delivery** to increase the rate and number of homes built in Merton. These actions include proactive engagement with developers, registered providers and delivery partners to investigate housing delivery constraints and investigation on whether the use of Compulsory Purchase Orders should be considered as a measure to unlock stalled housing sites. The delivery of sites will be monitored in Merton's Authority Monitoring Report (AMR) and Merton's Housing Delivery Test Action Plan.

- 5.5. *Mayor's suggestion:* The draft Plan could make it clearer that in order to follow the Fast Track Route, planning applications for new homes must meet the borough's tenure split requirements too.
- 5.6. *Merton's response:* we have recommended additional modification AM11.2 to the Planning Inspectors to improve clarity.

AM11.2

Policy H11.1 (f) Housing Provision

Threshold level to be eligible for the Fast-Track Route as set out in the London Plan **and meet Merton's tenure split requirements and** provided all provision is on-site without public subsidy:

- 5.7. *Mayor's suggestion:* Merton should make it explicitly clear whether or not the small sites target has been rolled forward beyond 2029.
- 5.8. *Merton's response:* we have recommended additional modification AM11.9 to the Planning Inspectors to improve clarity.

AM11.9

Paragraph 11.2.8

In accordance with London Plan paragraph 4.1.11, Merton's target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings and includes the rolling forward of the small sites target beyond 2029.

- 5.9. *Mayor's suggestion:* Additional housing that could be delivered as a result of any committed [transport] infrastructure improvements should also be included in the target beyond 2029.
- 5.10. *Merton's response:* Noted. Further minor changes proposed (reference AM11.7): additional wording to be added to para.11.2.4 and new additional paras to be added immediately after para 11.2.4 to address the Mayor's suggestion by clarifying Merton's position concerning additional housing delivery beyond 2029.

AM11.7

Paragraph 11.2.4

In recognition of the significant increase in housing delivery required by these targets, the London Plan states at paragraph 4.1.10, that these may be achieved gradually and encourages boroughs to set a realistic and where appropriate, stepped housing delivery target over a ten-year period. London Plan paragraph 4.1.11 states that if a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings which cover the period to 2041 and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites. Figure 4.2.1 sets out Merton's Housing Trajectory.

New paragraph - Merton supports high quality development, which meets identified needs. Merton faces constrained supply as it is characterised by a very large number of small sites and green spaces. These characteristics are replicated in several of the surrounding and adjacent boroughs.

New paragraph - The SHLAA 2017 findings indicate that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2035/36 increases to 548 homes per annum.

New paragraph - Merton can confirm that there are no committed transport infrastructure improvements which can be considered to provide additional capacity for new homes beyond 2028/2029 as per Merton's Infrastructure Needs Assessment 2021 and Transport for

London's representations on Merton's Local Plan. Merton will continue to work proactively and collaboratively with the Mayor in contributing to addressing much needed additional homes for London.

5. Signatories

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

Signatories

Signed for London Borough of Merton by:

Name - James McGinlay

Job Title – Assistant Director for Sustainable Communities



Signature -

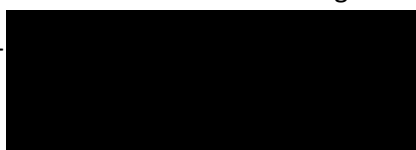
Date – 8th June 2022

Signed for on behalf of the Greater London Authority by:

Name - Lucinda Turner

Job Title - Assistant Director of Planning

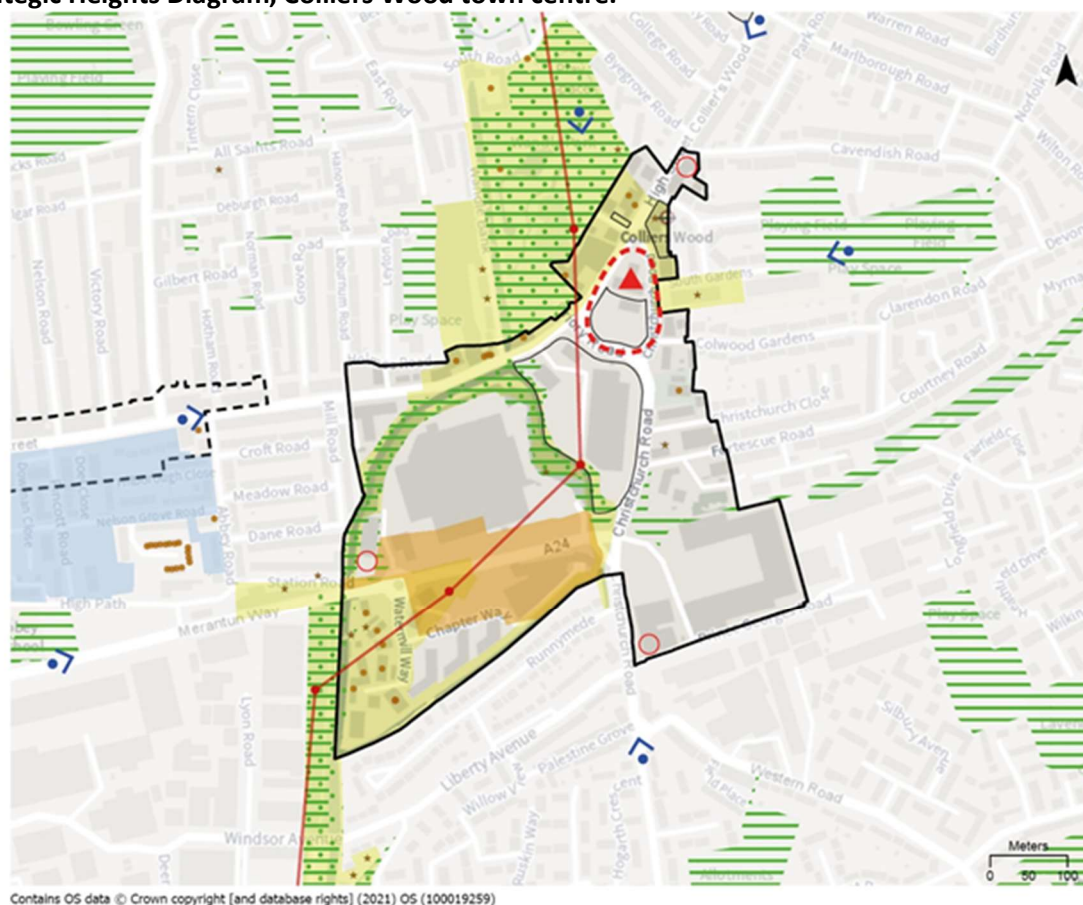
Signature -



Date – 31 May 2022

Appendix 1 - Strategic Heights Diagrams

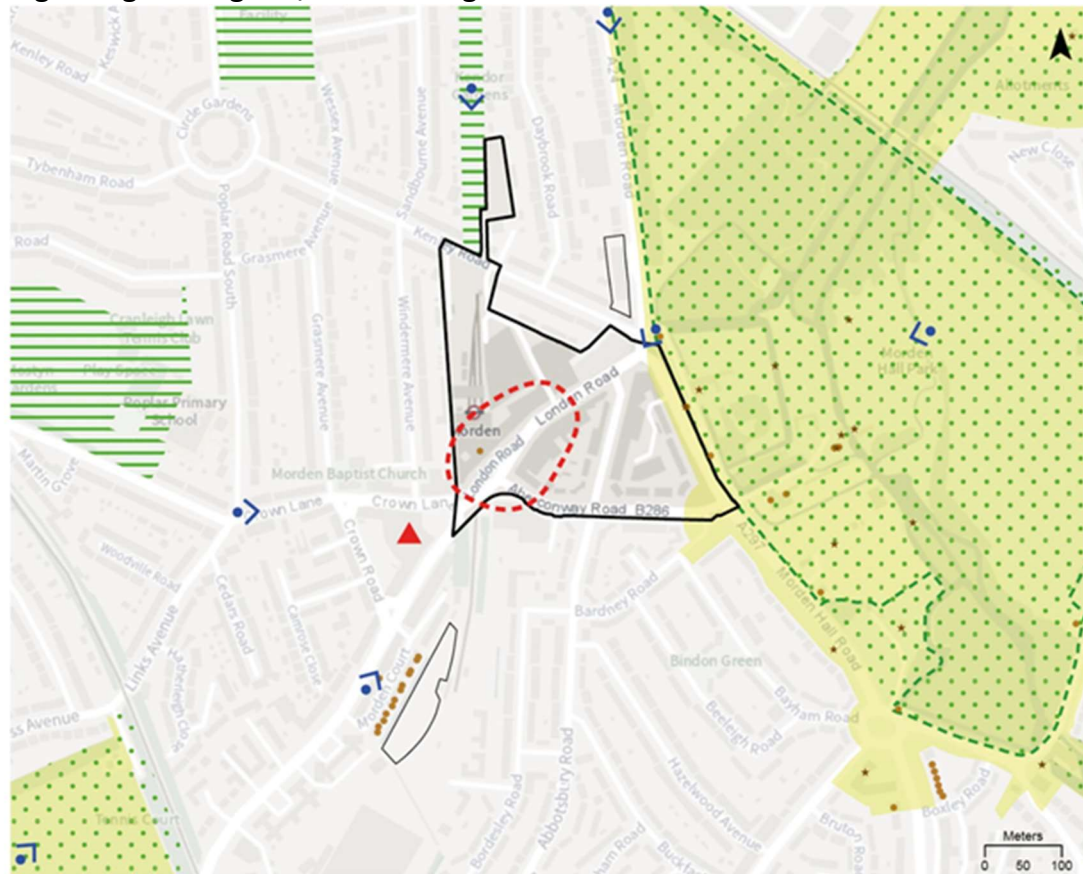
Strategic Heights Diagram, Colliers Wood town centre.



- | | |
|--|--------------------------------|
| Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys] | Estate regeneration: High Path |
| Tall building cluster heights range: up to 49m [approx. up to 15 storeys] | Metropolitan Open Land [MOL] |
| Britannia Point height: 58m [19 storeys] | Open space |
| Gateway buildings | Conservation area |
| Townscape views into town centre | Scheduled ancient monuments |
| Electricity pylons | Registered parks and gardens |
| Site allocations | Listed buildings |
| South Wimbledon town centre | Locally listed buildings |



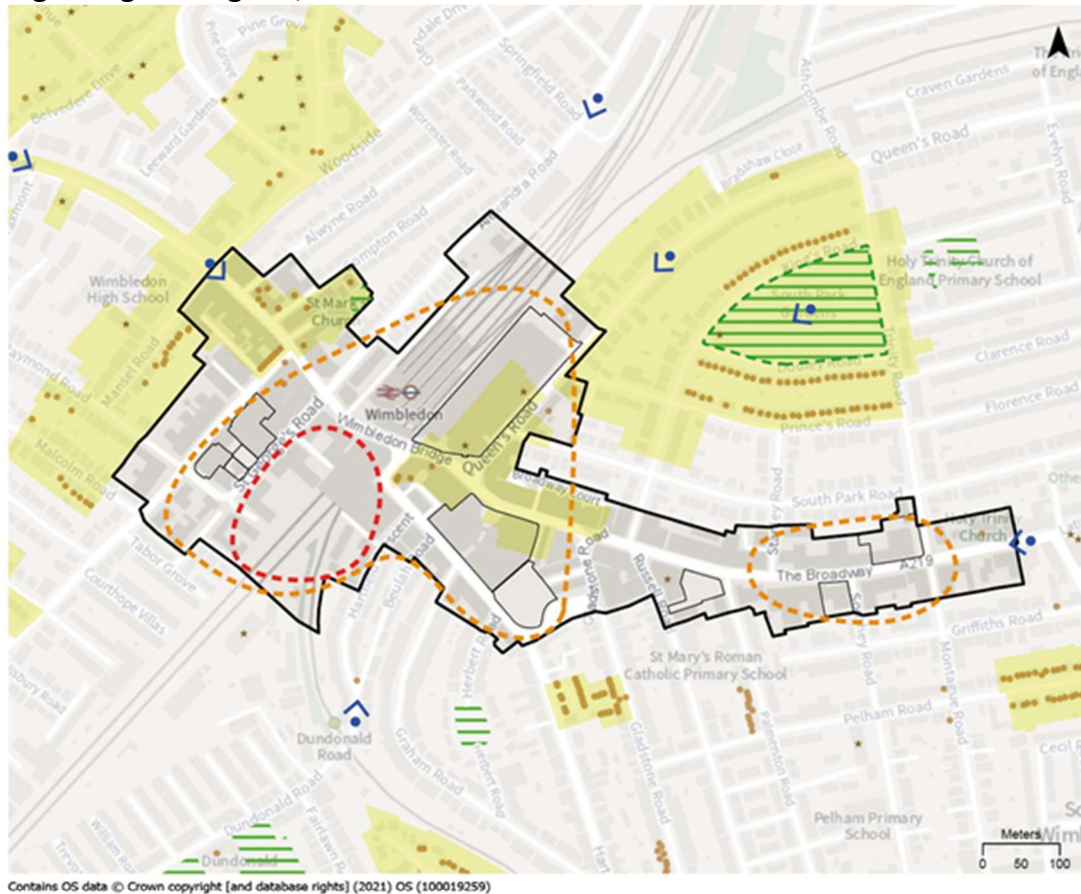
Strategic Heights Diagram, Morden Regeneration Zone.














- | | |
|--|--|
|  Morden Regeneration Zone
heights range: up to 39m
[approx. up to 12 storeys] |  Conservation area |
|  Tall building cluster
heights range: up to 71m
[approx. up to 22 storeys] |  Registered parks and gardens |
|  Morden Civic Centre
approx height: 58m [16 storeys] |  Listed buildings |
|  Townscape views into
town centre |  Locally listed buildings |
|  Site allocations | |
|  Metropolitan Open Land [MOL] | |
|  Open space | |



Strategic Heights Diagram, Wimbledon town centre.



-  Wimbledon town centre heights range: up to 24m [approx. up to 6 storeys]
-  Tall building cluster heights range: up to 48m [approx. up to 12 storeys]
-  Tall building cluster heights range: up to 40m [approx. up to 10 storeys]
-  Townscape views into town centre
-  Site allocations
-  Metropolitan Open Land [MOL]
-  Open space
-  Conservation area
-  Registered parks and gardens
-  Listed buildings
-  Locally listed buildings



Appendix 2 – supporting text for Morden N5.1 (proposed in Submitted Document 0D4: Merton’s Local Plan incorporating proposed modifications)

Tall buildings and sensitive edges

~~5.4.32.5.1.26.~~ The introduction of higher density development and tall buildings within ~~in the Wider Morden Town Centre Area and in particular within the~~ Morden Regeneration Zone, will optimise residential development and help to meet the need for additional and mixed housing in the area and will promote a more balanced and cohesive community. The additional population within the town centre will make existing businesses and services more viable and help sustain more facilities in the future, including the potential to develop a night time economy.

~~5.4.33.5.1.27.~~ Tall buildings that meet the requirements in policy D512.6, are considered appropriate as part of the regeneration to deliver optimised residential development and intensified use of the highly accessible land within the Morden Regeneration Zone ~~and in limited locations, were demonstrated to relate well to the surrounding context, on sites within the Wider Morden Town Centre Area that are in close proximity to the Morden Regeneration Zone. Opportunities exist to use tall buildings to enhance the image of Morden.~~ In appropriate locations, tall buildings can assist with reimagining the town centre and the creation of new character areas and features, creating gateways to the town centre and landmarks in key locations that add character and legibility.

~~5.4.34.5.1.28.~~ The Strategic Heights Diagram for the Morden Regeneration Zone specifies height limits in accordance with the London Plan. The proposed height for each building within the Morden Regeneration Zone will need to be justified in accordance with the criteria in policies D12.3 ‘Ensuring high quality design for all developments’, D12.5 ‘Managing heritage assets’ and D12.6 ‘Tall buildings’. The scale of existing buildings ~~within the suburban Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area,~~ is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties.

~~5.4.35.5.1.29.~~ The Morden Town Centre Visual Impact Assessment (2020) and the Morden Town Centre Heritage Review (2020) use an indicative 3D model of the SDF to

CH.05 | P.194

respectively assess potential height, massing and bulk impacts, and potential impacts on the settings of Heritage Assets, from a selection of viewpoints. Where appropriate, these documents also propose mitigation measures for future detailed development proposals.

5.1.30. In accordance with policies D5.12.6 'Tall buildings' and D5.12.5 Managing heritage assets', development proposals will be required to provide comprehensive townscape appraisals and visual assessments to ensure that any tall buildings are located appropriately and relate well to the surrounding context and public realm, particularly at street level, and conserve and where appropriate enhance the local ~~h~~Heritage ~~a~~Assets. A plan-led approach will ensure that any tall buildings within the Morden Regeneration Zone are sensitively designed and appropriately located, ~~and on sites within the Wider Morden Town Centre Area that are outside but in close proximity to the Morden Regeneration Zone, we will actively co-ordinate the details of proposed tall buildings on a case by case basis with reference to the numerous criteria in policies D5.1 — D5.6.~~

Appendix 3: the proposed modifications to Site allocation Mo1 (in Morden) as set out from page 211 onwards of Submitted Document OD4 Merton's Local Plan and Policies Map incorporating proposed amendments

Indicative site capacity (new homes): circa 2000 new homes.

Morden Regeneration Zone site vision:

The regeneration vision seeks to take the opportunity to enable large-scale development in the Morden Regeneration Zone town-centre, which will secure economic, environmental, and social benefits in accordance with the London Plan. The following are opportunities that could be brought forward on the site through comprehensive regeneration:

1. The delivery of an appropriate mix of retail, office, commercial, community and leisure use, including night-time uses, improved transport infrastructure and public realm, and a significant quantity of new residential development (circa 2,000 units).
2. Comprehensive regeneration of the site, to optimise the delivery of new homes, improve the street scene and public realm, make it easier to get around, and support businesses and other appropriate town centre uses.
3. Transforming the appearance, ~~and~~ user experience and air quality of Morden Town Centre by relocating the bus stands outside the Morden underground station away from their current location ~~and creating to help create~~ healthier streets and a welcoming public space outside the Morden underground station entrance.
4. A range of appropriate public spaces and streets within the Morden Regeneration Zone that enhance accessibility ~~through the Wider Morden Town Centre Area to the surrounding area~~, with pedestrians and cyclists as the priority.
5. Incorporating green infrastructure ~~and where appropriate, contributing to that contributes to improved drainage, air quality and~~ the creation of green links through the Wider Morden Town Centre Area Morden Regeneration Zone, and its surrounding connecting to the open spaces in the surrounding Morden Neighbourhood.
6. The use of tall buildings where appropriate and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.
7. The provision of an appropriate mix of retail, office, community and leisure uses, including night time uses, which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.
8. The delivery of low carbon district heating within the Morden Regeneration Zone and opportunities to link to the wider area.

A vibrant and functional new town centre, during and after the construction period, with built-in flexibility to respond to changing town centre use patterns, will have to be an essential feature of any proposal.

In accordance with the Strategic Heights Diagram for the Morden Regeneration Zone ~~a plan-led approach~~, taller buildings would be acceptable in this town centre site, to ensuring the best use of this land that benefits from excellent public transport accessibility. Tall buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by a comprehensive townscape appraisal and visual assessment.

The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter.

The site location	
Approach to tall buildings	<p><u>The Strategic Heights Diagram for the Morden Regeneration Zone sets out the height limits for this. However, all building heights will be This site will include tall buildings in appropriate locations</u> subject to consideration of impacts on existing character, heritage and townscape <u>in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'as part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.</u></p>

Appendix 4 – recommended full text of Policy D12.Tall buildings

~~Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan.~~

Tall buildings in the borough are defined as a minimum of 21m from the ground level to the top of the uppermost storey.

In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon. It is crucial that tall buildings are of the highest quality of design and construction.

~~Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.~~

1. Tall buildings are only acceptable in the following locations:

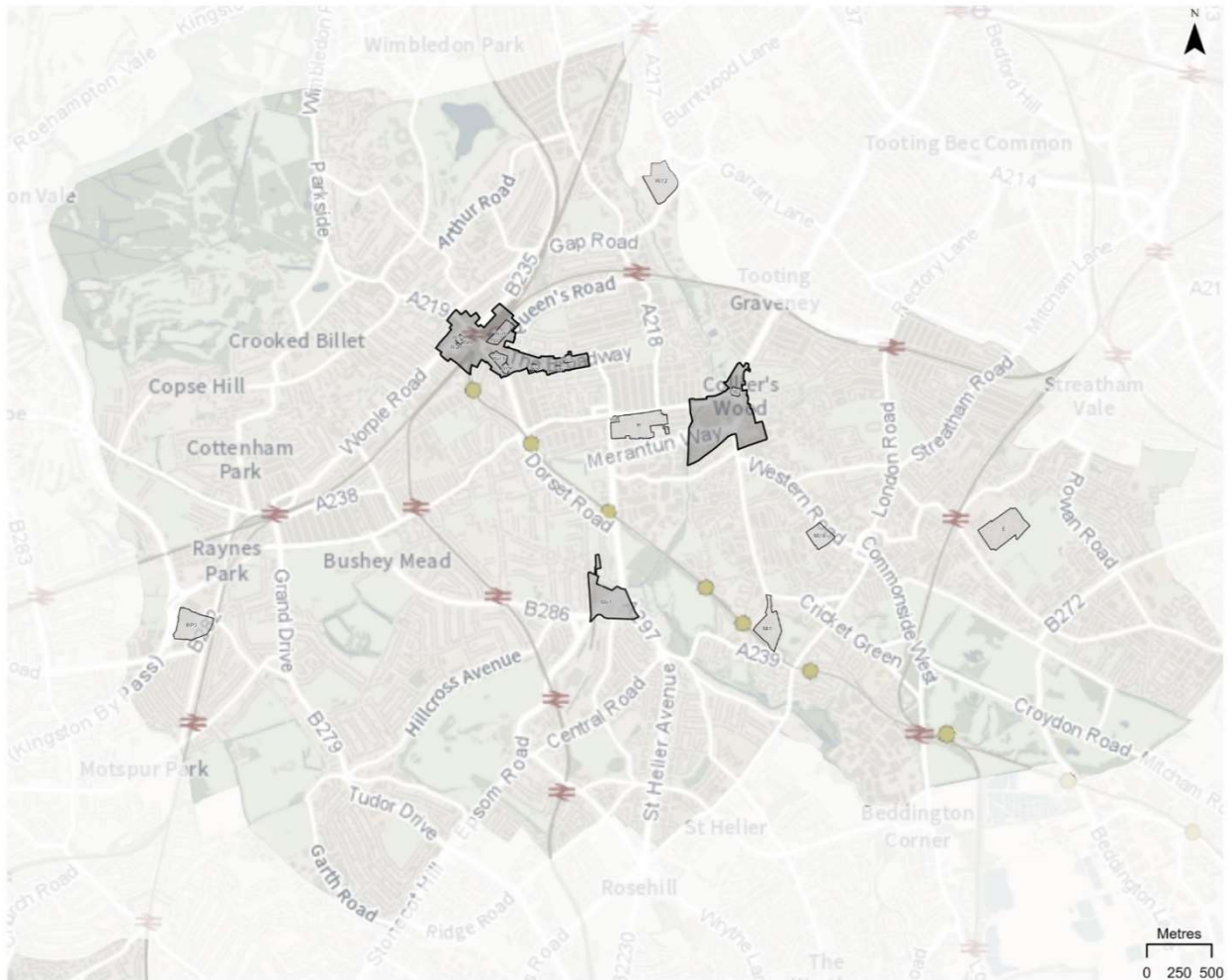
- a. As indicated in the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre.
- b. Wimbledon town centre, as set out within the chapter on Wimbledon
- c. Morden Regeneration Zone, as set out within the chapter on Morden.
- d. Colliers Wood, as set out within the chapter on Colliers Wood.
- e. As set out within Merton's adopted Estates Local Plan 2018 for Eastfields and High Path estates.
- f. Where they are identified in the following site allocations, CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.

1. WeThe council will generally support tall buildings in those locations set out in part 1 of this policy where:

- g. Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine local character and heritage assets and their settings through townscape analysis of short, mid and long views.
- h. They enhance the setting and/or relationship with neighbouring heritage assets.
- i. They are of exceptional design and architectural quality.
- j. They ~~are informed by~~ have had regard to the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.
- k. They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.
- l. They ensure the ground and lower levels are designed for a human scale and maximise the amount of active frontage and natural surveillance.
- m. They do not impact the opportunities of neighbouring or adjoining sites, including across borough boundaries.
- n. They are designed to mitigate against any micro climatic effects such as sun, reflection and wind, and internal spaces are designed to mitigate overheating.
- o. They create minimal negative harm to the quality of neighbouring public spaces and open spaces.
- p. They include high quality and useable public open space, appropriate in size and location to the building and its site characteristics.
- q. ~~They're an~~ An appropriate material pallet that is well detailed and safe is proposed.
- r. They provide a mix of tenure and home sizes in accordance with ~~this Local Plan's policies on~~ Housing.


- s. They incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails, these will be well designed and should be integrated into the overall design of the building.
 - t. Appropriate provision for waste and bicycle storage is provided and is integrated into the overall design of the building.
 - u. Their shared spaces, such as lobbies, communal gardens and corridors are designed to enhance social cohesion and mental and physical wellbeing.
 - ~~v. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document.~~
 - ~~w. They are within Morden, as set out and site allocation Mo4.~~
 - ~~x. They are within Colliers Wood, as set out within the site allocation CW2.~~
2. Development proposals for tall buildings should be supported by:
- w. A detailed townscape analysis that includes short, mid and long views and analysis of its impact on their setting. In particular their impact on heritage assets such as parks or buildings and open spaces.
 - x. A digital 3D model in agreement with the council that can be used to evaluate its visual impact across the borough and beyond.

Map of appropriate locations for tall buildings (illustrating Policy D12.6 part 1 (a-f))



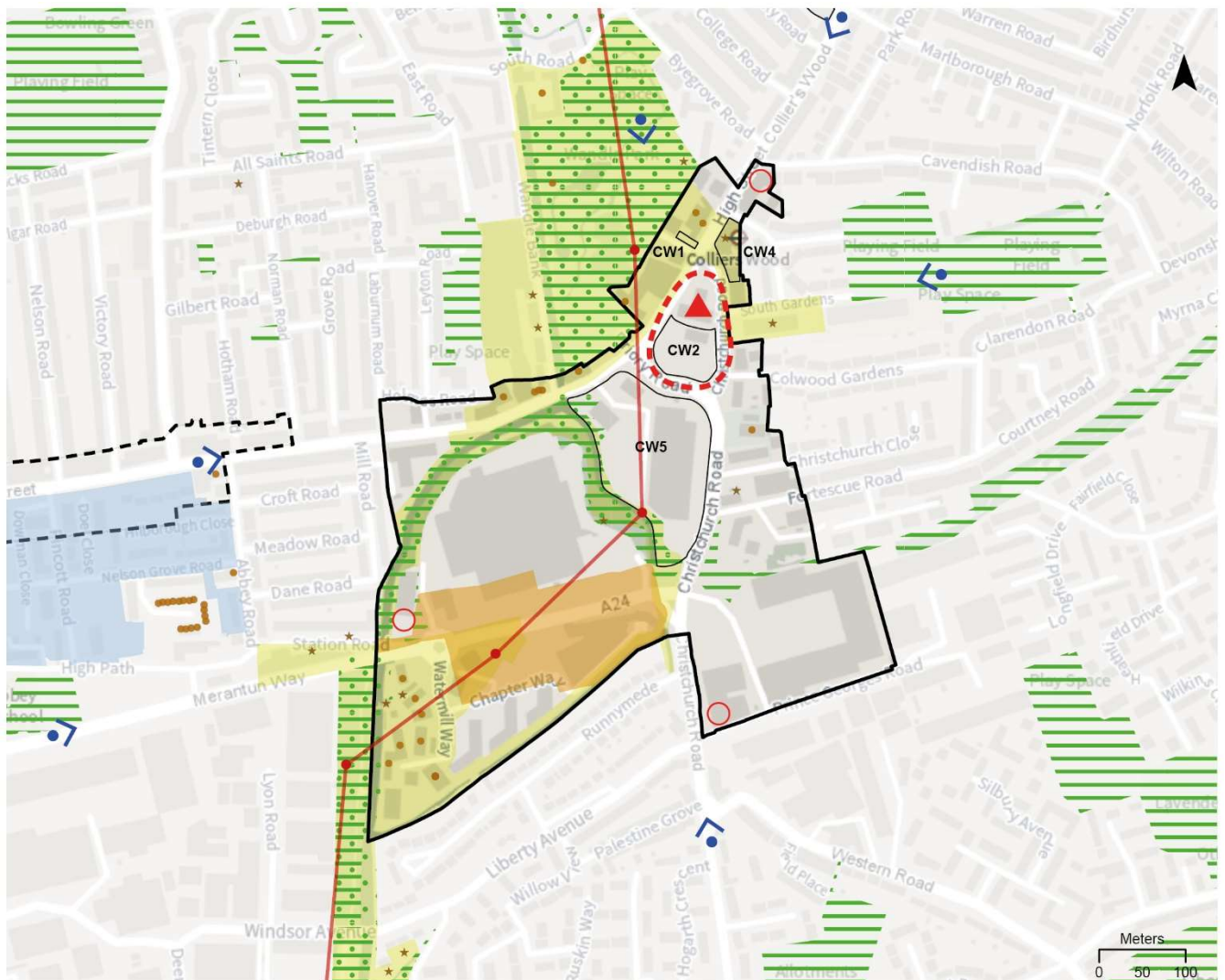
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 Town Centre boundaries
[Colliers Wood, Morden Regeneration Zone & Wimbledon]

 Relevant site allocations and estates local plan boundaries



Strategic Heights Diagram, Colliers Wood Town Centre.

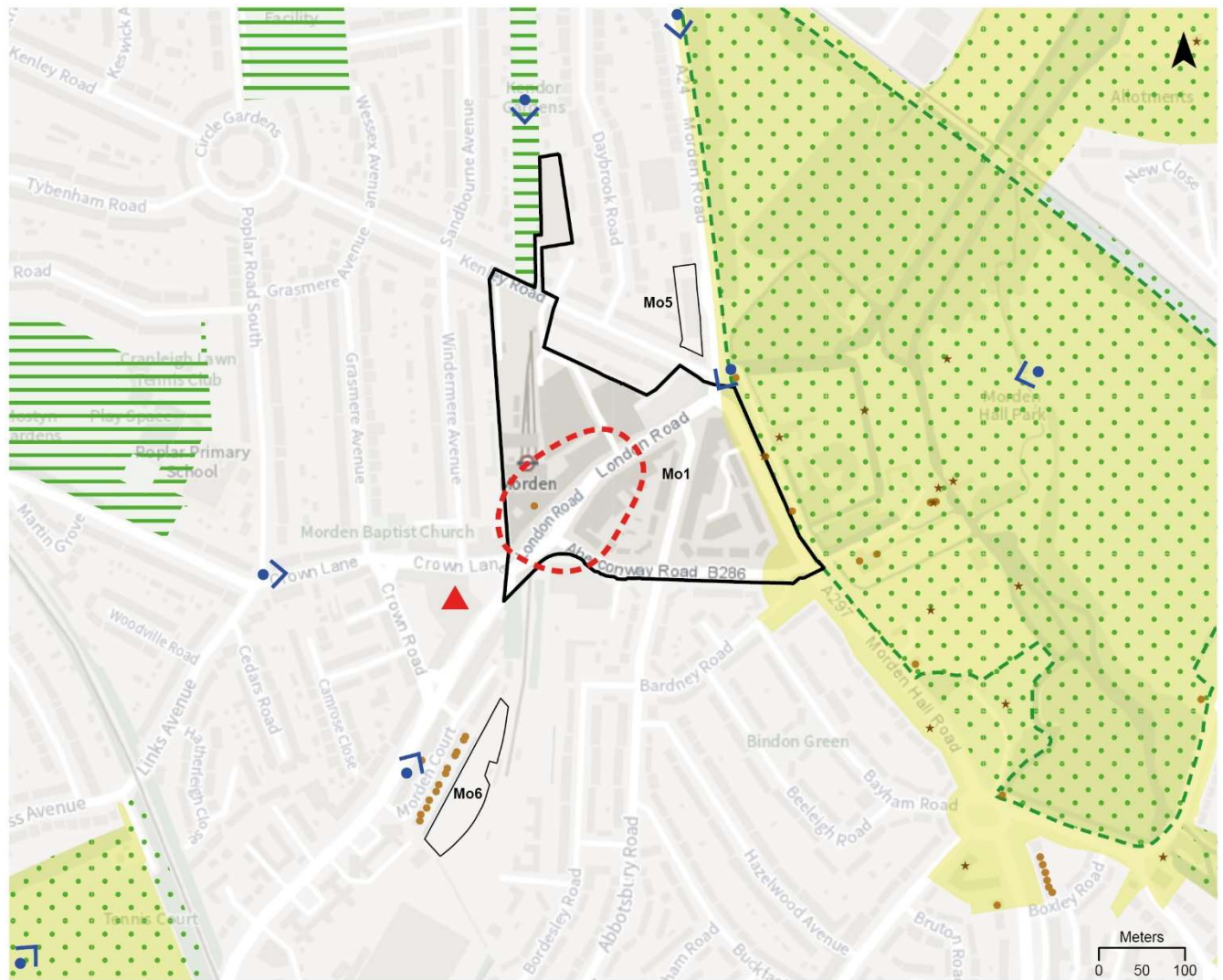


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- | | | | |
|---|--|---|--------------------------------|
|  | Colliers Wood town centre heights range: up to 21m [approx. up to 7 storeys] |  | Estate regeneration: High Path |
|  | Indicative location of tall building cluster heights range: up to 49m [approx. up to 15 storeys] |  | Metropolitan Open Land [MOL] |
|  | Britannia Point height: 58m [19 storeys] |  | Open space |
|  | Gateway buildings |  | Conservation area |
|  | Townscape views into town centre |  | Scheduled ancient monuments |
|  | Electricity pylons |  | Registered parks and gardens |
|  | Site allocations |  | Listed buildings |
|  | South Wimbledon town centre |  | Locally listed buildings |



Strategic Heights Diagram, Morden Regeneration Zone.

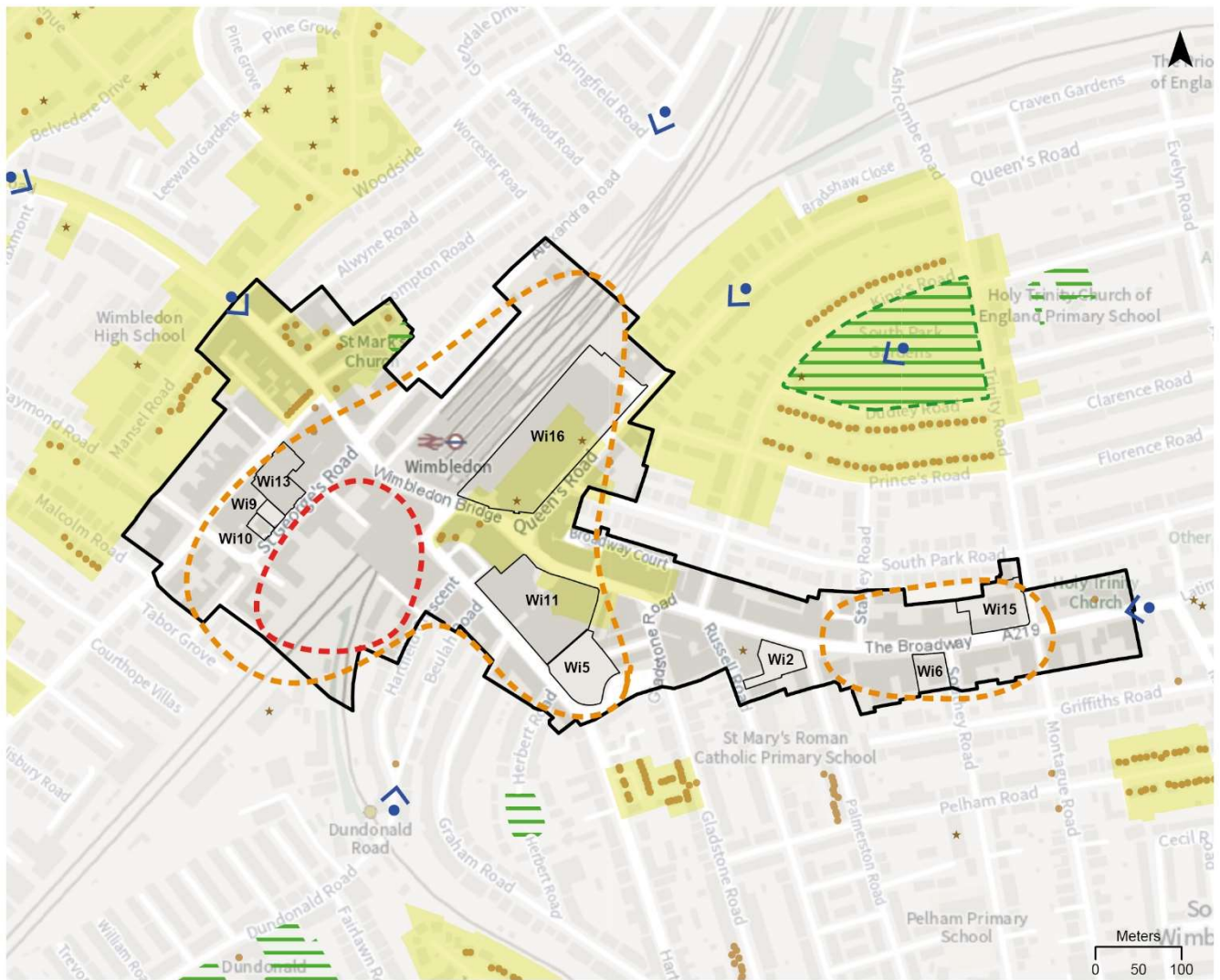


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







- | | | | |
|---|---|---|------------------------------|
|  | Morden Regeneration Zone
heights range: up to 39m
[approx. up to 12 storeys] |  | Open space |
|  | Indicative location of tall
building cluster
heights range: up to 71m
[approx. up to 22 storeys] |  | Conservation area |
|  | Morden Civic Centre
approx height: 58m [16 storeys] |  | Registered parks and gardens |
|  | Townscape views into
town centre |  | Listed buildings |
|  | Site allocations |  | Locally listed buildings |
|  | Metropolitan Open Land [MOL] | | |



Strategic Heights Diagram, Wimbledon Town Centre.



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- | | | | |
|---|---|---|------------------------------|
|  | Wimbledon town centre
heights range: up to 24m
[approx. up to 6 storeys] |  | Open space |
|  | Indicative location of tall
building cluster
heights range: up to 48m
[approx. up to 12 storeys] |  | Conservation area |
|  | Indicative location of tall
building cluster
heights range: up to 40m
[approx. up to 10 storeys] |  | Registered parks and gardens |
|  | Townscape views into
town centre |  | Listed buildings |
|  | Site allocations |  | Locally listed buildings |
|  | Metropolitan Open Land [MOL] | | |



~~Justification~~ Supporting Text

- 1.1.1. Tall buildings can form part of a masterplan approach to help manage future growth and regeneration opportunities by contributing to new homes and economic growth.
- 1.1.2. Merton's definition of 'a minimum of 21m from the ground level to the top of the building's last habitable floor' provides further clarity and is equivalent to the London Plan definition of 'tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey'.
- 1.1.3. Tall and high density buildings can offer a range of benefits. For example, they can reduce the carbon footprint per dwelling by using district energy systems; they can help people live closer to local centres, reducing sprawl and retaining vital open land. When situated close to transport links, such buildings can reduce the reliance on cars and encourage healthier ways of getting around.
- 1.1.4. Tall buildings can also improve wayfinding and add to the visual intricacy of neighbourhoods. However, perhaps more than any other housing typology, tall buildings must balance the needs of individual homes with broader townscape considerations.
- 1.1.5. Exemplary tall buildings located in the right place can make positive contributions to Merton's townscape. However, if poorly designed and located inappropriately they can have a negative functional, environmental and visual impact and as such tall buildings will undergo a high level of design scrutiny.
- 1.1.6. Merton's Borough Character Study gives holistic guidance on best practice design approach highlighting the importance of a sites suitability and sensitivity.
- 1.1.7. Not all tall buildings need to be iconic landmarks. If tall buildings form a cluster or in close proximity to others, they should not compete and their

composition must be considered.

- 1.1.8. Applicants should be prepared to provide 3D digital models to analyse how their tall buildings are placed within the context of the borough and beyond, assessing cumulative impacts of both existing and permitted, but not yet completed, schemes.
- 1.1.9. Consideration must be given to ensure the development is inclusive for all sections of the community, in accordance with policies on Health and Wellbeing.

Appendix 5 – proposed modifications to Policy H11.1 (f) Housing Provision

f. We will expect the following level of affordable housing (gross) to be provided on individual sites as follows:

Threshold (gross)	Affordable housing level	Affordable housing tenure split	Required provision.
10 or more homes	Threshold level to be eligible for the Fast-Track Route as set out in the London Plan <u>and meet Merton's tenure split requirements</u> and provided all provision is on-site without public subsidy: 50% for public sector land or on industrial land where redevelopment would result in a loss of industrial capacity. For all other sites up to 50% with a minimum provision of 35%.	70% Low-cost rent 30% Intermediate	On-Site Only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on-site be considered by the council, and this must be justified and such schemes will be required to provide a detailed viability assessment.
2 – 9 homes	Financial contribution equivalent to 20% affordable housing provision.	70% Low-cost rent 30% Intermediate	Financial contribution

Tara Butler

Deputy Head of Future Merton
Merton Council
Merton Civic Centre
London Road
Morden
SW4 5DX

Department: Planning

Our reference: LDF24/LDD08/LP06/HA01
31 May 2022

By email: Tara.Butler@merton.gov.uk
future.merton@merton.gov.uk

Dear Tara

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Mayor's Opinion on the General Conformity of Merton's New Local Plan
with the London Plan 2021**

Further to your request on 25 April 2022 for the Mayor's opinion on the general conformity of the draft Merton New Local Plan with the London Plan 2021 (LP2021) and in accordance with Section 24 (5) of the Planning and Compulsory Purchase Act 2004, this letter sets out the Mayor's opinion at this stage of the process. The Mayor will provide an opinion on the general conformity of the plan, should there be a further consultation on proposed modifications to the draft Merton New Local Plan in the future.

In his response, dated 6 September 2021, to Merton's Regulation 19 consultation (Ref: LDF24/LDD08/LP04/HA01¹), the Mayor was clear, at that time, that as currently written the draft Plan did not identify on maps, locations which were considered suitable for tall buildings and nor were appropriate tall building heights set out within those areas. This meant that Merton's approach was not consistent with Policy D9 of the LP2021 and for that reason the Mayor considered the draft Plan to not be in general conformity with the LP2021.

Since that time, GLA and Merton Officers have worked together to resolve the general conformity issues in relation to Merton's proposed approach to tall buildings. The outcome of this collaboration has resulted in proposed modifications to the draft Plan, which the Mayor considers, resolve the general conformity matters raised in his earlier Regulation 19 response. These proposed modifications were agreed between the Mayor and LB Merton on 24 and 25 February 2022 via a Statement of Common Ground (SCG)

¹

<https://www.merton.gov.uk/system/files/Greater%20London%20Authority%20Merton%20Local%20Plan%20Stage%203%20response%20Sept21.pdf>

and this has now been published as part of Merton's examination library². The SCG has now been updated again (May 2022) to include further clarifications on Merton's proposed approach to tall buildings; proposed modifications which the Mayor welcomes.

To be clear, the Mayor now considers that the proposed modifications, set out in the Statement of Common Ground (May 2022), bring Merton's draft Local Plan into general conformity with the London Plan 2021.

If you would like to discuss this in more detail, please contact [REDACTED] at [REDACTED]@london.gov.uk .

Yours sincerely

[REDACTED]

Lucinda Turner

Assistant Director of Planning

Cc: Leonie Cooper, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC

² <https://www.merton.gov.uk/system/files/0D13a%20Greater%20London%20Authority%20Merton%20SoCG%20March22.pdf>

[REDACTED]

From: [REDACTED]
Sent: 31 March 2022 10:07
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Mitcham Gasworks - Further Pre-Application Meeting

Hi [REDACTED]

I hope you're well.

If you initiate the formal process our planning support staff will find some availability for us both. It would likely be some time in the second half of April or early May if done now.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATER LONDON AUTHORITY
169 Union Street, London SE1 0LL
[REDACTED] [london.gov.uk](https://www.london.gov.uk)
079 [REDACTED]

[london.gov.uk](https://www.london.gov.uk)

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 31 March 2022 09:53
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@wsp.com>
Subject: Mitcham Gasworks - Further Pre-Application Meeting

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED] and [REDACTED]

I hope you are both well.

It would be great to set up another meeting with yourselves to show some further progression on the scheme since the receipt of your comments, and other consultations we have been doing in the round. Could you advise of your availability over the next few weeks for a meeting?

We will obviously also kick off the formal process and arrange payment etc but I wanted to enquire as to your availability first off.

Best regards,

[REDACTED] BA (Hons), MA, MRTPI

[REDACTED]

From: [REDACTED]
Sent: 11 February 2022 17:11
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

Just a heads up – I have received the urban design comments, finished off my report and forwarded through to my manager for approval. You should receive it early next week.

Have a good weekend.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED]
Sent: 09 February 2022 13:48
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

I am still chasing our urban design officer unfortunately. I appreciate your patience and will keep you posted.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 09 February 2022 09:34
To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

When can we expect the report this week?

Thanks very much,

[REDACTED] [REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 03 February 2022 16:41

To: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>

Cc: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

I was just finishing up the report and I note that the urban design officer had only sent preliminary comments so I've had to go back to him. He was due back from leave today so I will get him to expedite.

Apologies in advance but I may not be able to get the response to you until next week.

Kind regards,

[REDACTED] [REDACTED]

Strategic Planner – Development Management

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

Email: [REDACTED]@london.gov.uk

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From: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>

Sent: 02 February 2022 14:30

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Mitcham Gasworks - GLA response

Thanks [REDACTED] Look forward to receiving the report, please let me know if you expect it to delay beyond this week.

Best regards,

[REDACTED] [REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 31 January 2022 08:30
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

I have received all the consultee comments so currently finalising the report. I will then send off to a manager for sign off. Hopefully you will receive a response this week.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED]@london.gov.uk

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 28 January 2022 18:11
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

Can we expect to receive the response on Monday?

Many thanks,

[REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 19 January 2022 22:47
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Mitcham Gasworks - GLA response

Hi [REDACTED]

I hope you're well.

I am still waiting on written comments from TfL, urban design and energy colleagues and will hopefully have the pre-app report to you by the end of the month. I will keep you posted.

Kind regards,

■■■■■
Strategic Planner – Development Management

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

Email: ■■■■■ [london.gov.uk](mailto:■■■■■@london.gov.uk)

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From: ■■■■■ <■■■■■@wsp.com>

Sent: 19 January 2022 17:04

To: ■■■■■ <■■■■■@london.gov.uk>

Cc: ■■■■■ <■■■■■@wsp.com>; ■■■■■ <■■■■■@london.gov.uk>

Subject: Mitcham Gasworks - GLA response

Hi ■■■■■

I hope you are having a good week and thanks for the meeting last week. Could you let us know when you expect to issue your written feedback please?

Thanks,

■■■■■ ■■■■■ **BA (Hons), MA, MRTPI**

Associate

[REDACTED]

From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 07 January 2022 18:03
To: [REDACTED]
Cc: [REDACTED]
Subject: Mitcham Gasworks - Transport Scoping Note
Attachments: 2022.01.07 Mitcham_Transport Scoping Note.pdf

Hi [REDACTED]
I hope you've had a good week. I just wanted to let you know that IcenI has prepared the attached note, which has been issued to TfL today. We are actually in the process of setting up a pre-application meeting with TfL so are not expecting Lucy to have read and digested all of this ahead of the meeting next Tuesday, as it will likely be discussed at a later date. Regardless, wanted you to be in the loop and have the document.
Would you like me to upload this via the pre-application website also?

Best regards,
[REDACTED] **BA (Hons), MA, MRTPI**
Associate
[REDACTED]

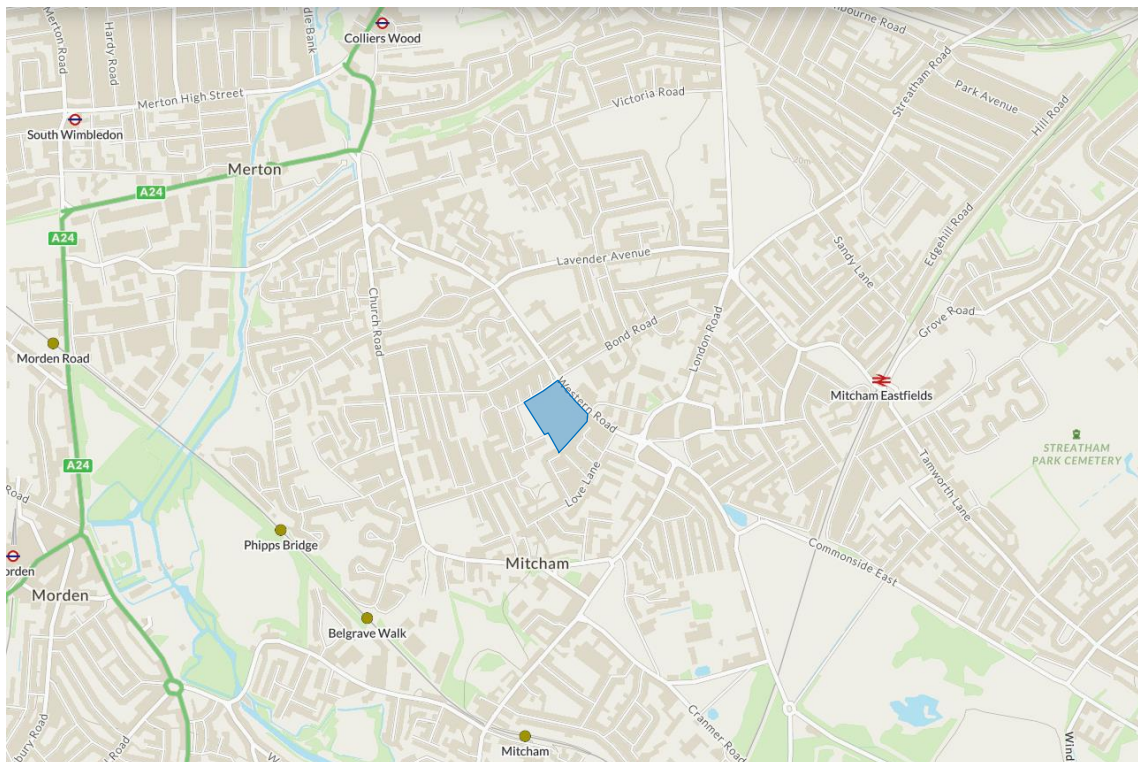


To: **GLA/TfL**
From: **Iceni Projects - Transport**
Date: **January 2022**
Title: **Mitcham Gasworks – Scoping Note**

a. Scoping Note

1. This Transport Scoping Note provides an outline of the Transport Assessment (TA) that will be provided in support of a future planning application for the proposed redevelopment of the Mitcham Gasworks site (the Site), in the London Borough of Merton (LBM). The proposals seek to obtain planning permission for a residential-led development comprising up to 700 residential units in total, with associated landscaping, servicing areas and parking, as well as an element of non-residential community space which is proposed to be a Creche.
2. This Scoping Note sets out the intended approach for the TA of the forthcoming planning application. The Site's location is shown broadly in blue in **Figure 1**.

Figure 1 – Site Location



b. Section 1 - Introduction

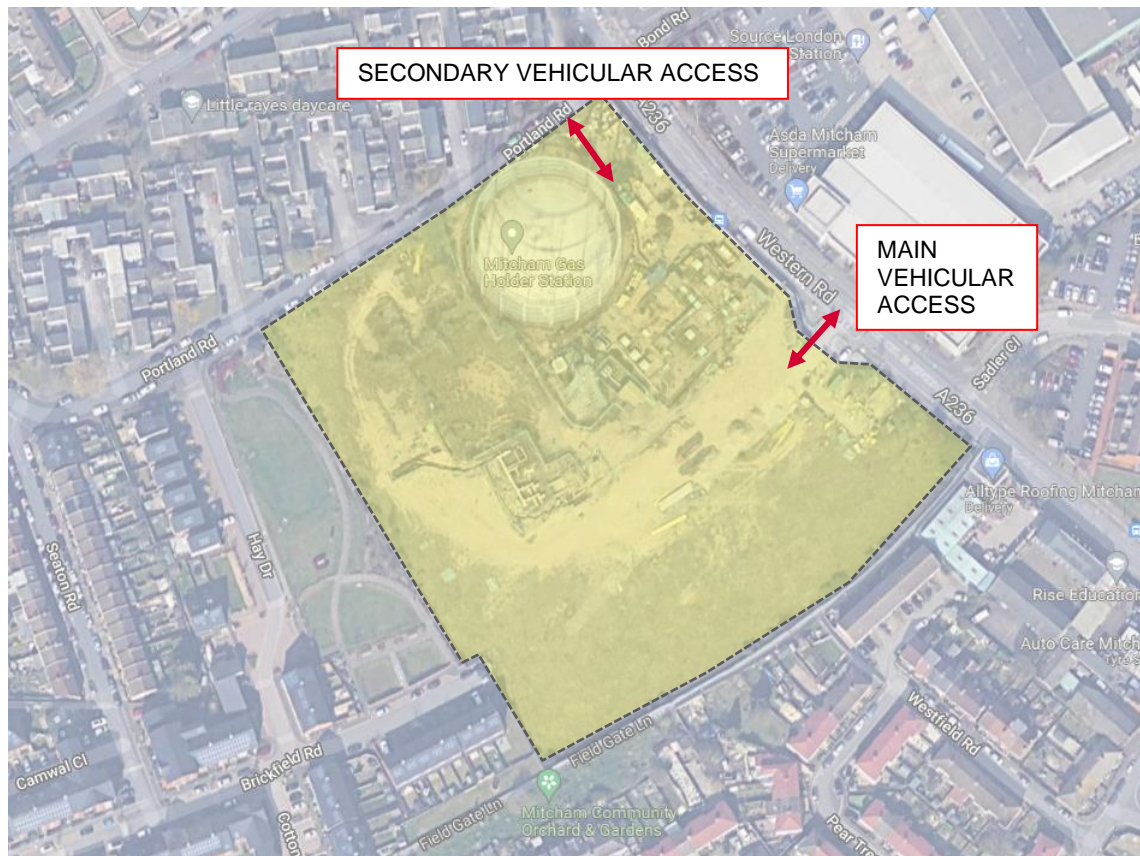
3. In preparation of the TA, consideration will be given to the 'Healthy Streets Approach'. This is reflected throughout this note where necessary, and the ten indicators outlined within Healthy Streets have been referred to during the early stages of the design.

4. Iceni Projects have undertaken a number of large-scale planning applications since TfL launched the new Healthy Streets TA guidance in 2019 and are therefore well versed in the requirements for sites such as this. This includes the Active Travel Zone (ATZ) of the Site and the necessary public transport assessments.

c. Section 2 – Site Description, Highway Conditions and Sustainable Travel Assessment

5. The development Site is approximately 2ha in size and is bounded by Portland Road to the northwest, Hay Drive to the southwest, Field Gate Lane to the south and southeast and, and Western Road to the northeast.
6. There are two existing vehicular accesses to the Site; the main access is provided via Western Road broadly central along this site frontage, and a secondary access is located on Portland Road, just after its priority junction with Western Road. These existing access locations are shown in **Figure 2**.

Figure 2 – Existing Access Locations

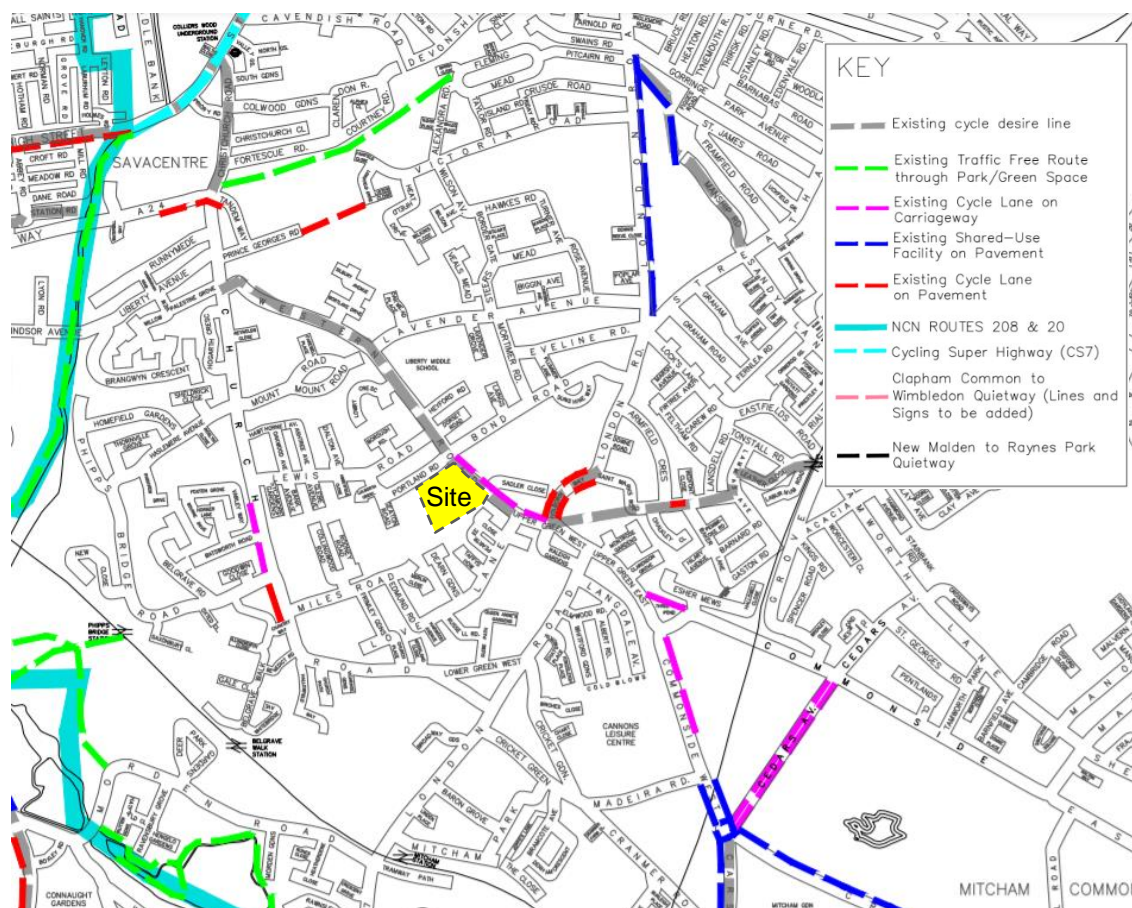


7. The Site accommodates two electricity sub stations, two operational gas Pressure Reduction Stations (PRS) and below ground gas mains stemming from the sites use as a gasworks. Additionally a large redundant gasholder and telecoms mast are found to the north of the site.
8. According to TfL's WebCAT website, the majority of the Site has public transport accessibility level (PTAL) of 3 (moderate accessibility), also has an area of PTAL 2 (poor accessibility) in the south west corner and 4 (good accessibility) to the north east. Notwithstanding, a manual recalculation has been undertaken which takes in to account the Belgrave Walk Tram Stop, southwest of the site. Including this Stop demonstrates the Site actually benefits from a PTAL 3

to 4. The intention would be to submit the revision to the Street Analysis team at TfL for consideration and agreement. This manual PTAL calc is summarised within a note included at **Appendix A1**.

9. The nearest underground station is Colliers Wood (Northern Line) which is approximately 1.4km (18-minute walk) from the Site, and the nearest rail station is Mitcham Eastfields (Thameslink and Southern Trains) less than 1km (12-13-minute walk) away. The Belgrave Walk stop on the Tramlink service is also located within a circa 950m distance of the Site.
10. There are also a high number of bus stops / services available within the local area, with two immediate bus stops on Western Road adjacent to the Site frontage, and further bus stops on the local roads, including London Road which provide access to a number of alternative services.
11. Full details of these public transport facilities will be provided within the TA, which will include accessibility and capacity assessments as detailed later in this note.
12. Possible improvements to pedestrian and cycle infrastructure, and connections to local public transport will be explored as part of the application and details will be included within the submitted TA and ATZ assessment. These improvements will ensure that the development accords where possible with the 10 Healthy Streets Indicators.
13. There are several local cycle routes signed local to the Site, and a cycle 'desire line' along Western Road, as shown at **Figure 3**.

Figure 3 – Existing Cycle Routes Locally (Extract LBM website)



d. Section 4 – Development Proposals, Access Arrangements and Active Travel Zone

14. The proposal is for a mixed-use development predominantly comprising circa 700 residential units alongside a circa 370m² creche.
15. The below section provides an initial review of the Proposed Development from an overall highways perspective, focussing on each of the key elements – Access, A TZ assessment, Parking and Delivery / Servicing.

Access

16. The proposal would include the creation of new vehicular accesses to the Site on both Western Road and Portland Road, with the existing access to be removed / reinstated as footway. Both the proposed accesses will be in the form of simple priority 'T' junctions, and the TA will include a visibility splay assessment as well as swept path analysis with the required vehicles. Additionally, a Stage 1 Road Safety Audit (RSA) will be undertaken for these two proposed accesses and the results of this, along with Iceni Transport's 'Designers Response' will be included within the TA.
17. The proposed vehicular access strategy is illustrated on the plan at **Figure 4**, with the location of the two vehicular accesses shown by the blue line, which then continue to broadly show how the internal road network is proposed to operate.

Figure 4 – Proposed Access Strategy



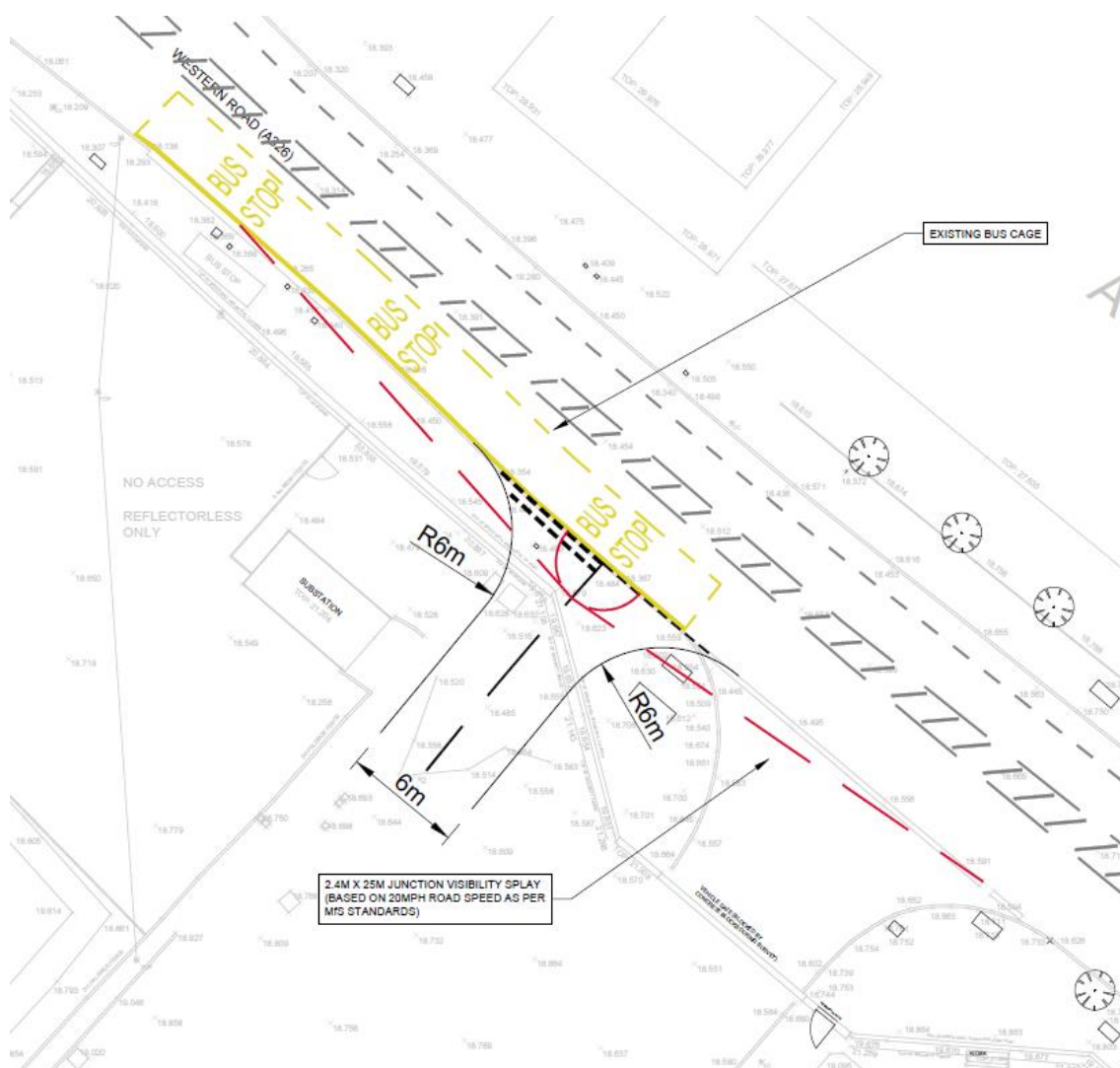
18. **Photos 1** shows the existing carriageways along Western Road, bus stop and site boundary wall in the location of the proposed junction accesses.

Photo 1 View Along Western Road



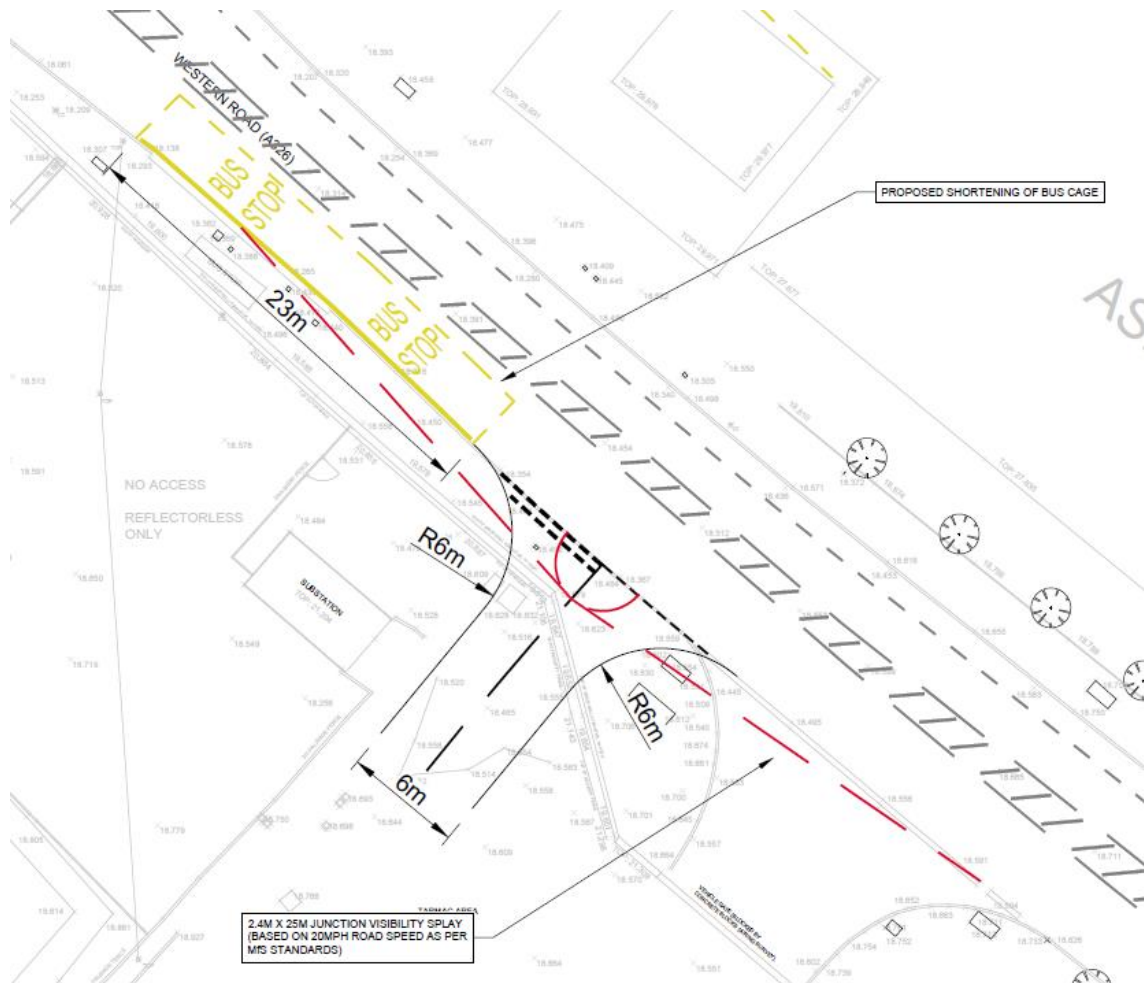
19. As shown in **Photo 1** the Western Road access will conflict with the existing bus cage associated with the Sadler Close bus stop. This is shown in detail at **Figure 5**.
20. The bus cage is currently circa 37 metres long, although it is noted from a review of Google Maps shows that it used to be shorter but was extended at some point during the period of June 2016 and May 2017, taking it right up to the junction radii of the existing main access. It's worth noting that the existing bus stops upstream and downstream are significantly shorter in length.
21. The access junction on Western Road is proposed as 6m wide with 6m radii. Visibility is achievable to Manual for Streets (MfS) for a 20mph speed limit. An indicative plan of the access on Western Road within proximity of the existing 37-metre-long bus cage is shown at **Figure 5**.

Figure 5 – Proposed Access & Existing Bus Cage on Western Road



22. Given the encroachment across the junction we have taken the liberty of contacting the TfL Asset Management team in respect of shortening the bus cage in line with local precedent. After sending them the information they have confirmed that they are happy to shorten the length of the bus cage. TfL's Service Delivery Manager for Merton has confirmed that shortening this bus cage to 23 metres in length is sufficient for services utilising this stop. At 23 metres the bus cage begins where the western radii meets the existing kerb line, as illustrated in the below **Figure 6**. TfL has confirmed that whilst they find this solution acceptable, and have written to Merton Council explaining as much, it is up to Merton Council to make the final decision and arrange for the work to be done – although we expect this can be included within the S.278 for the proposed access works. This correspondence is also appended at **Appendix A2**.

Figure 6 – Proposed Access & Shortened Bus Cage on Western Road



23. As mentioned previously, Portland Road is currently subject to unrestricted parking along its length and therefore the proposed access strategy will mean that some of this parking will be displaced due to double yellow lining being required both opposite and immediately either side of the junction.
24. It is noted that double yellow lining restrictions have been installed in the last few years at the existing accesses to the residential estates opposite the Site (shown in **Photo 2** below).

Photo 2 – Existing Double Yellow Lines on Portland Road



25. To facilitate a safe access to the Site it is considered that this double yellow lining could be extended in-between the two accesses (opposite the proposed access point), which is a distance of circa 18m, accommodating approximately 3 parked vehicles. It is also suggested that double yellow lining should be provided for circa 10m either side of the proposed access, which will be approximately 13.3m wide radii to rail, equating to a total distance of 33.3m. This is equivalent to circa 5-6 cars, so in total the double yellow lining and access may result in the displacement of 8-9 unrestricted parking spaces as shown illustratively at **Photo 3**.

Photo 3 View along Portland Road

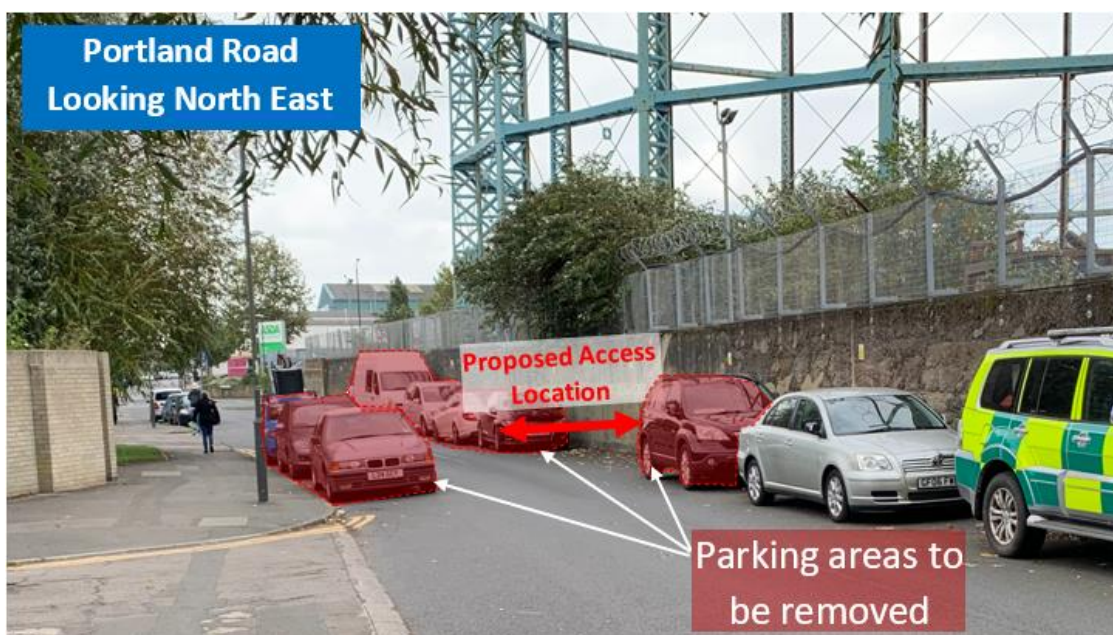


Figure 8 – Proposed Parking Survey Scope



30. The details of the parking survey will be set within the TA. However, given the impact of the proposals on Portland Road, the parking survey results are summarised as follows for the roads; Portland Road (and Portland Road side roads), Seaton Road, Lulworth Crescent and [REDACTED] Road.
31. In total, there are 152 unrestricted parking spaces within the above mentioned roads. During both evenings of the survey, there were 37 and 34 spaces available, a 34% and 29% spare capacity respectively. It is estimated that nine existing unrestricted parking spaces will be removed as part of the proposals. Therefore, the displacement of parking on Portland Road as a result of the proposed development access will not have a detrimental impact on local roads.
32. The internal road network within the Site will be designed to accommodate two-way vehicular movement, although given the limited parking proposed (discussed below in greater detail) it is expected that vehicles passing each other within the Site would be low and on an ad-hoc basis. The Site layout will also benefit from turning heads where necessary to ensure that all vehicles that enter the site can also exit in forward gear, including all servicing, refuse and emergency vehicles. The internal layout is currently being developed and at the appropriate time swept path analysis will be undertaken to ensure that the relevant vehicles can make these turning manoeuvres.
33. The design ensures that vehicular and pedestrian movements are segregated, with clear pedestrian routes available. The intended pedestrian routes through the site and to the local existing connections are shown in **Figure 9**.

Figure 9 – Proposed Pedestrian Connectivity



34. The proposals are therefore looking to:

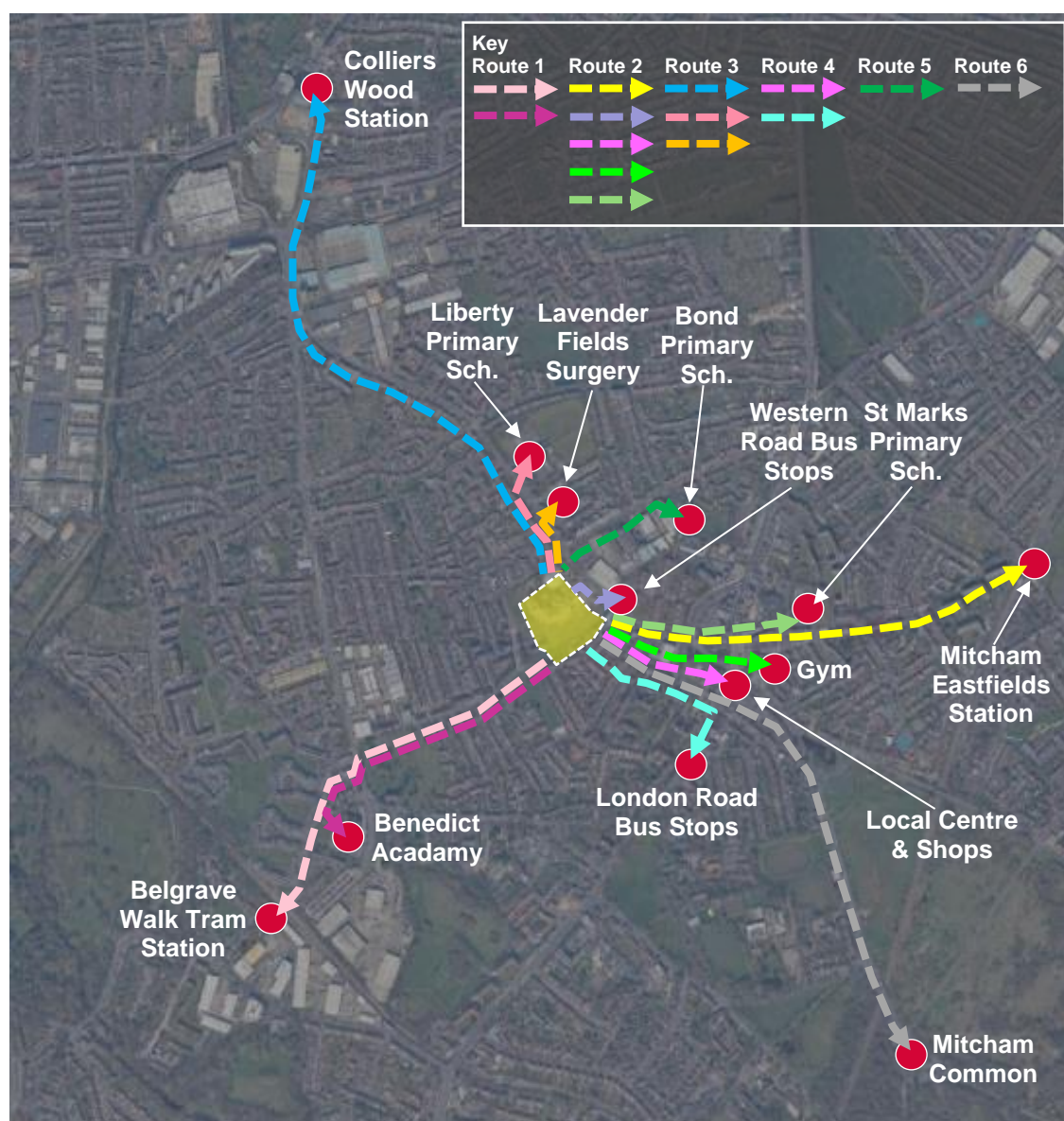
- Establish a legible hierarchy of new links with a well-defined community heart;
- Provide new north-south and east-west connections through the Site;
- Providing a wider, more legible and secure Field Gate Lane;
- Extending the existing Brickfield Road connection (non-vehicular);
- Removal of the Portland Road boundary; and
- Creation of a new footpath along the length of Portland Road.

35. The design is therefore being worked up to ensure that safety is at the forefront with vehicle / cycle / pedestrian conflict being considered and mitigated against, in line with Vision Zero.

Active Travel Zone

36. The following ATZ routes to and from the key destinations within the study area have been identified. They were presented to Merton Council and were broadly agreed, although we are awaiting a formal response. The routes and destinations are illustrated at **Figure 10**. Are they agreeable for TfL to use for the Healthy Streets assessment?

Figure 10 – ATZ Routes



37. From undertaking the initial ATZ assessment, the following key destinations have been established:

- Public Transport Services – Mitcham Eastfields rail station, Colliers Wood London Underground (LU) station and Belgrave Walk Tram Stop, as well as bus stops on Western Road and London Road;
- Local Centre / Shops – Retail units along Upper Green East and surrounding area;
- Educational Facilities – Liberty Primary School, Bond Primary School, St Mark's Primary School and Benedict Academy;
- Health Facilities – Better Gym, Lavender Fields GP Surgery and Simply Bright dental clinic;
- Open Space – Mitcham Common; and

38. These destinations have resulted in six key routes being established:

- Route 1 – Belgrave Walk tram stop and Benedict Academy via Brickfield Road, Miles Road and Belgrave Walk / Church Road;

- Route 2 – Mitcham Eastfields rail station, Bus Stops on Western Road, Mitcham Local Centre, Gym, Dentist and St Mark's Primary School via Western Road, Upper Green West, St Mark's Road, Laburnum Road and Eastfields Road.
 - Route 3 – Colliers Wood LU station, Liberty Primary School and Lavender Fields GP surgery via Western Road and Christchurch Road;
 - Route 4 – Bus Stops on London Road and Mitcham Local Centre via Western Road and London Road;
 - Route 5 – Bond Primary School via Western Road and Bond Road; and
 - Route 6 – Mitcham Common via Western Road, Upper Green East and Commonsides East.
39. The identified routes provide access to all of the key destinations that are likely to be used by future occupiers of the Site. These routes will be assessed as part of the healthy streets assessment within the TA.
40. A site visit / photo study will be undertaken of these routes to establish the current state and whether any improvements are required, in addition to a review of the killed or seriously injured (KSI) collision data, in line with the 10 Healthy Streets indicators.
41. Full details on the ATZ, and any identified improvements, will be detailed within the TA.

Parking

42. The Proposed Development will include circa 140 parking spaces, which is a 20% provision based on the 700 residential units currently proposed. This provision is consistent with local applications; Benedict Wharf's provision is 30% and it is located in PTAL 3, High Path Estate's provision was 20% and it is located in PTAL 4.
43. The Site is located on a bus route (Western Road), opposite an Asda supermarket and a 3min walk from Mitcham town centre, which has a wide and varying range of everyday amenities and services. In addition, the PTAL of the site is currently 3-4 but is on the edge of PTAL 4 for the entire site with Belgrave Tram stop within 950m walk and Mitcham Eastfield Rail Station just outside the PTAL walking threshold by circa 100m. Further, a review of TfL's TIM report shows that central and west London are within 45-60min commute and that there are 42 primary and 13 Secondary schools within 30 minutes of the Site.
44. With reference to the London Plan standards, Merton is classified as an Outer London borough and as previously mentioned this Site has a majority PTAL of 3-4, which therefore sets the maximum parking provision at up to 0.75 spaces per dwelling for 1 to 3 bed units, (PTAL 4) and 0.75 space per dwelling for 1 to 2 bed units and 1 space per dwelling for 3+ bed units (PTAL 3). Therefore, there is a range of maximum parking provision for the scheme.
45. The London Plan Policy T6 states *"Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')"*. A move towards lower parking provision is a clear policy across London, which is accompanied by a push for increased usage of sustainable modes of transport. Therefore, provision of 20% parking only is therefore appropriate and considerably lower than the policy requirement. It will promote sustainable travel whilst providing inclusive environments for people to live so those with occupations requiring ownership of motor vehicles, such as midwives etc, will have an opportunity to reside at the development with access to car parking.

46. This parking will also include provision for blue badge holders in accordance with the London Plan standards, with 3% of the total number of dwellings provided with a space from the outset. This number of spaces will be provided within the Site, and a Car Park Management Plan will be prepared with the planning application submission. This will also include details on how a further 7% disabled spaces could be provided should demand arise.
47. The parking spaces will be in accordance with London Plan policy regarding electric vehicle charging points (EVCP). As such, 20% of the parking spaces will benefit from active electric vehicle charging provision, and the remaining 80% will be passive to be converted to active spaces in the future as and when required.
48. A car club is also proposed, and contact has been made with Enterprise Car Club, Eurocar and ZipCar which operate services in South London. Currently there are no car clubs in Mitcham, the closest being at Colliers Wood. Therefore, the provision of car club services could have a very positive affect on car ownership locally.
49. Zip Car and Eurocar have already confirmed that they would like to provide their car club facilities at this Site, and this can be secured through a condition or a S106 agreement. Their proposal will look to provide two to three car club spaces at the Site, although this will be confirmed as the development proposals progress to submission of a planning application and will also ultimately be monitored through a Travel Plan with further spaces provided if deemed necessary should changes to car ownership levels change locally. These spaces would be available to residents and placed in convenient locations but also available to the wider public. Zip Car also offer incentives, such as free membership for three years for all new residents of the development.
50. These findings support the change in trends St William have monitored across Berkeley Group developments in similar locations around London, whereby car clubs can significantly influence local trends towards car ownership.

Non-Residential Uses

51. A single parking space may be provided within the proposals for the community use. It is also acknowledged that a small number of vehicle trips associated with this use may occur, and these will be considered within the Trip Generation for the proposals in the TA when the size and type of community use is detailed.

Cycle Parking

52. Cycle parking will be provided in accordance with the standards detailed within the London Plan (March 2021) and will also conform with TfL's London Cycling Design Standards (LCDS) document, including spaces for larger cycles and ensuring accessibility for all.
53. Separate cycle parking for the residential and non-residential uses will be provided. Each use will benefit from cycle parking in secure, lit and convenient locations.
54. Visitor cycle parking will be provided within the public realm areas but again will be in accordance with the LCDS ensuring it is designed so it is appropriate for use by all.

Deliveries and Servicing Strategy

55. The scheme will be designed to ensure that deliveries and servicing can take place on-Site and therefore will not impact on the local highway network, with no vehicles having to stop on the roads surrounding the Site. Whilst the layout is still emerging at this stage, it is being tested with swept path analysis and this will be included within the TA once the layout is fixed.
56. A Delivery and Servicing Plan will be prepared and accommodate the planning application submission, which will include the proposed strategy to accommodate these trips, and any mitigation measures to be put in place.
57. Set down areas for deliveries are located towards the front of the Site, located conveniently close to the concierge. Servicing vehicle trips have been forecast in the next section of this note.
58. We are currently waiting for Merton Council to provide a formal response to the pre-app meeting. To date they have commented that trip generation from the Site will need to be looked at again, which we have done and is provided in Section 5. The access arrangements, parking survey, and ATZ was all discussed and whilst there were no rejection of the proposals during the pre-app meeting, Merton Council will need to respond in an official capacity to confirm the outcome of the discussions.

e. Section 5 – Trip Generation

59. Given the relatively low level of car parking proposed across the Site the associated vehicular trip generation is expected to be minimal. Notwithstanding, an assessment has been undertaken to determine the expected number of vehicular trips and trips by other modes.
60. In the first instance, in order to understand how existing residents travel in the area, reference has been made to the 2011 Census for Method of Travel to Work data for the '*Merton 018 Middle Super Output Area*'. **Table 1** below demonstrates this existing modal share.

Table 1: Method of Journey to Work (Residents)

Mode of Transport	%age of Mode
Underground, Metro, LR	24%
Train	8%
Bus, minibus or coach	23%
Taxi	0%
Motorcycle, scooter or moped	1%
Driving a car or van	29%
Passenger in a car or van	2%
Bicycle	3%
On foot	10%
Other method of travel to work	1%
Total	100%

61. **Table 1** above demonstrates that whilst driving represents the highest single proportion, accounting for 29% of all trips, the cumulative combined total of underground, train, and bus indicates that public transport is in fact the most used method of travel, at 54%. Active travel (consisting of travel by foot or bicycle) accounts for 13%.

Trip Rates

62. Vehicle trips rates have been derived from agreed trips rates from two local planning applications – ‘Ravensbury Estate’ (17/P1718) and ‘Benedict Wharf’ (19/P2383) – and due to the differing trip rates agreed an average of the two trip rates has been calculated. In addition, we have also used TRICS in order to provide a comparison. Both of the developments have consent and so the trip generation has been agreed and accepted by LBM / TfL and seems like a logical point at which to start assessing vehicle trips.
63. The two consented schemes are located circa 1km south of the proposal Site with lower PTAL ratings and with worse access to Mitcham Town Centre. Therefore, it is considered the vehicle trip generation for these developments will be robust when applied to the proposed development.
64. The methodology both consented schemes adopted to obtain their trip rates involved consulting the TRICS database to forecast the likely number of ‘person’ trips associated with the development during a typical weekday during the AM and PM periods. This ‘person’ trip rate was applied to the total number of residential units to create a total number of person movements generated by the site. 2011 census ‘Travel to Work’ data was then obtained for Merton 018 (as set out above). The person trips were then distributed in line with the determined travel modes in order to provide a trip generation for vehicular traffic.
65. **Table 2** shows the car trip generation data for the two developments taken from the respective Transport Assessments.

Table 2 – Agreed Trip Generation for Consented Applications

Trip Rate Set	AM			PM		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
Ravensbury Estate Vehicle Trips	8	65	72	31	13	44
Benedict Wharf Vehicle Trips	14	65	79	70	22	92
Average	11	65	77	51	18	68

66. While there are 700 units proposed, there will only be 140 parking spaces (0.2 spaces per unit) and, as such, basing the trip generation on 700 dwellings will overestimate the number of trips the site will generate. It is therefore considered more appropriate to calculate the number of trips associated with the site using the number of parking spaces as not all dwellings will generate car trips.
67. To obtain a trip rate per parking space from the locally consented schemes, we have used the agreed vehicle trip generation and applied the number of trips to the number of parking spaces provided. The parking provision for the two schemes used as a basis for the trip generation is as follows:

- Ravensbury Estate – 176 spaces
- Benedict Wharf – 255 spaces

68. **Table 3** below sets out the vehicle trip rates using trips per parking space from the two local consented schemes calculated based on the vehicle trips outlined in **Table 2** and the parking provision outlined above. For clarity, an example of how the trip rates have been calculated is provided below:

- 8 arrivals at Ravensbury Estate in the AM divided by the 176 parking spaces equates to 0.045 trips per space
- 65 departures from Ravensbury Estate in the AM divided by the 176 parking spaces equates to 0.469 trips per space

Table 3 – Agreed Trip Rates for Consented Applications

Trip Rate Set	AM			PM		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
Ravensbury Estate Vehicle Trips	8	65	72	31	13	44
Ravensbury Estate Vehicle Trip Rate Per Parking Space	0.045	0.369	0.409	0.176	0.074	0.250
Benedict Wharf Vehicle Trips	14	65	79	70	22	92
Benedict Wharf Vehicle Trip Rate Per Parking Space	0.055	0.255	0.310	0.275	0.086	0.361
Average	0.050	0.312	0.359	0.225	0.080	0.305

69. **Table 4** below sets out the predicted vehicle trip generation based on the proposed 140 car parking spaces.

Table 4 – Predicted Vehicle Trips for 140 Parking Spaces

Trip Rate Set	AM			PM		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
Ravensbury Estate Vehicle Trip Generation Per Parking Space (140 spaces)	6	52	57	25	10	35
Benedict Wharf Vehicle Trip Generation Per Parking Space (140 spaces)	8	36	43	38	12	51
Consented Schemes Average Trip Gen Per Parking Space (140 spaces)	7	44	50	32	11	43

70. Following the above, a multi-modal trip generation assessment has been undertaken to determine the likely number of trips associated with the Proposed Development. This has been

based on the average of the person trip rates agreed for the two consented developments used to calculate the car trips. The person trip data is shown in **Table 5**, which also includes the number of person trips for the proposed 700 dwellings based on the average person trips for the two developments.

Table 5 –Total Person Trip Rate

	AM Peak			PM Peak		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Ravensbury Estate	0.122	1.027	1.149	0.496	0.208	0.704
Benedict Wharf	0.135	0.613	0.748	0.426	0.217	0.643
Average	0.129	0.820	0.949	0.461	0.213	0.674
Proposed Trips	90	574	664	323	149	471

71. The Table below shows the number of trips by each mode based on applying the census mode shares to the total person trips.

Table 6 – Census Mode Shares

Mode of Transport	%age of Mode	Arrive	Depart	Total	Arrive	Depart	Total
Underground, Metro, LR	24%	22	138	159	77	36	113
Train	8%	7	46	53	26	12	38
Bus, minibus or coach	23%	21	132	153	74	34	108
Taxi	0%	0	0	0	0	0	0
Motorcycle, scooter or moped	1%	1	6	7	3	1	5
Driving a car or van	29%	26	166	193	94	43	137
Passenger in a car or van	2%	2	11	13	6	3	9
Bicycle	3%	3	17	20	10	4	14
On foot	10%	9	57	66	32	15	47
Total	100%	90	574	664	323	149	471

72. **Table 6** shows that basing the person trips on the Census mode shares overestimates the number of car trips generated by the proposed development, due to a mode share of 29% car drivers not being reflective of the low level of car parking proposed. As such, the mode shares have been recalculated assuming that the total person trips shown in **Table 6** and the car driver trips shown in **Table 4** remain the same and all other modes are redistributed on a pro rata basis using the Census data. The resulting trips are shown in **Table 7**.

Table 7 – Adjusted Multi Modal Trips

Mode of Transport	Arrive	Depart	Total	Arrive	Depart	Total
Underground, Metro, LR	28	179	208	98	47	145
Train	9	60	69	33	16	48
Bus, minibus or coach	27	172	199	94	45	139
Taxi	0	0	0	0	0	0
Motorcycle, scooter or moped	1	7	9	4	2	6
Driving a car or van	7	44	50	32	11	43
Passenger in a car or van	2	15	17	8	4	12
Bicycle	4	22	26	12	6	18
On foot	12	75	86	41	19	60
Total	90	574	664	323	149	471

73. **Table 7** is considered to show a more realistic assessment of the number of trips that would be made by each mode based on the low level of car parking proposed.
74. The multi-modal trip generation has therefore demonstrated that the 700 residential dwelling development is likely to result in a total of 664 person trips during the AM peak hour and 471 trips in the PM peak hour. The majority of these trips will be undertaken by public transport, with 70% split between Underground, Train and Buses.
75. This also equates to just under one vehicle trip per minute in both peak hours as a result of providing 140 parking spaces on Site.
76. Should the trip generation above be acceptable, we would consider this reasonably low and unlikely to have a severe impact on the local highway network once distributed on to Western Road and Portland Road.

f. Section 6 – Travel Plan

77. A Framework Travel Plan (FTP) will be submitted with the application, which will be produced in line with the relevant TfL guidance. This FTP will set out measures to reduce the dependence on the private vehicle, and instead focus on sustainable modes of travel.
78. The following documents will also be provided:
- Car Parking Management Plan;
 - Cycle Parking Management Plan;
 - Delivery and Servicing Plan; and
 - Framework Construction Management Plan.
79. If there are any other transport/highway documents required for planning submission, please let us know.

A1. MANUAL PTAL CALCULATION

To:	Transport for London/London Borough of Merton
From:	Iceni Projects (Transportation)
Date:	13 th September 2021
Title:	Mitcham Gas Works – Manual PTAL Calculation

a. Introduction

1. Iceni Projects Ltd has been instructed by St William Homes LLP to provide highways and transport advice for their proposed redevelopment at former Mitcham Gasworks ('the site'), within the London Borough of Merton (LBM). The location of the site is shown in **Figure 1.1**.

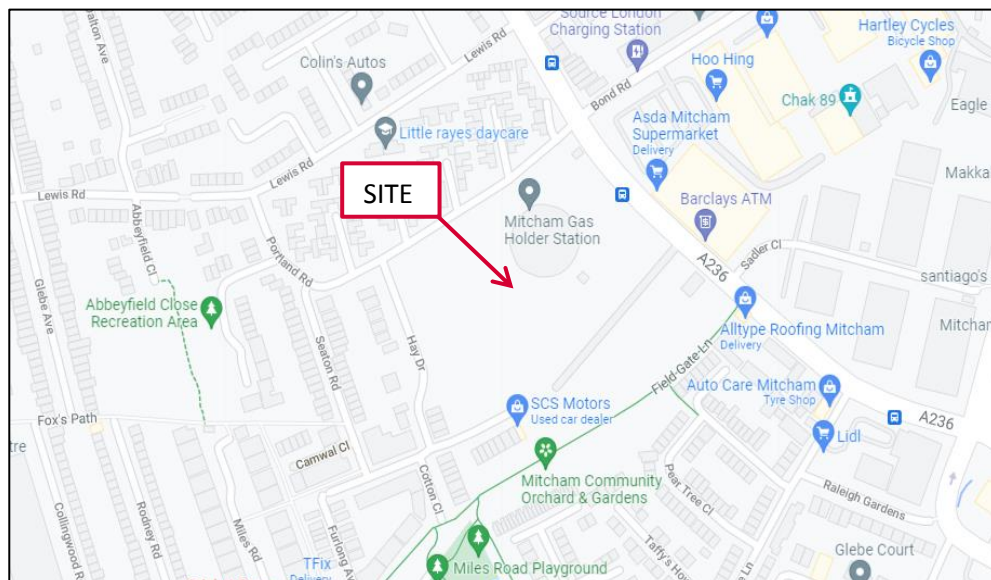


Figure 1.1 – Site Location

2. It is proposed to redevelop the site to replace the Mitcham Gasworks with circa 600 residential units. Given the proximity of the site to the town centre and public transport opportunities the applicant is keen to provide a car-lite development and as part of this is required to demonstrate that the site is suitably located to accommodate this.
3. The WebCAT planning tool has been used to obtain the PTAL rating for the site and this gives the site a rating of 3 (moderate), however, it is considered that the actual accessibility of the site is better than this. **Figure 1.2** shows an extract from the PTAL summary report, and the full report is included at **Appendix A1**.



Figure 1.2 – PTAL Map

4. Having reviewed the summary report, it is noted that the Public Transport Accessibility Index (PTAI) of the site is calculated as 12.24, which makes it clearly within a PTAL 3, which requires a PTAL of 10-15 as shown in the table below taken from the PTAL methodology guidance document.

Table 3 Public Transport Accessibility Levels

PTAL	Range of Index	Map Colour	Description
1a (Low)	0.01 – 2.50	Dark Blue	Very poor
1b	2.51 – 5.00	Blue	Very poor
2	5.01 – 10.00	Cyan	Poor
3	10.01 – 15.00	Green	Moderate
4	15.01 – 20.00	Yellow	Good
5	20.01 – 25.00	Orange	Very Good
6a	25.01 – 40.00	Red	Excellent
6b (High)	40.01 +	Dark Red	Excellent

5. It should be noted that the WebCAT website provides ratings for each 100m square as shown in **Figure 1.2** and, as this is a fairly large area, the site-specific rating may differ from this. Therefore, this report considers provides a detailed assessment of the site to determine whether the PTAL rating is accurate when measured directly from the site.

b. Methodology

6. In order to provide a comparison to the formal PTAL calculation a manual PTAL calculation has been undertaken using the same public transport services and frequencies as the formal report, with the only difference being that Mitcham Eastfields railway station and Belgrave Walk tram stop have been measured from the site. For the purposes of this, measurements have been taken from the eastern edge of the Gasworks Site off Western Road for Mitcham Eastfields railway station and from the southwestern corner of the Site via Field Gate Lane for Belgrave Walk tram stop.

7. In terms of public transport access points, the catchment area parameters for railway stations are defined by a maximum walk time of 12 minutes or a walking distance of 960m.
8. To supplement the PTAL calculation, a manual walking distance measurement for Belgrave Walk tram stop has been undertaken and it has shown a walk distance of 910m or 11 – 12 minutes' walk time. This is within the PTAL maximum parameters for accessing a public transport node. Mitcham Eastfields railway station shows a walk distance of 980m, just 20m over the threshold, or 12 – 13 minutes' walk time to the station. Whilst this is slightly outside the PTAL walking distances to rail stations, it is a public transport node that sits just outside the threshold distance and not accounted for within the PTAL calculation.
9. The *Chartered Institution of Highways and Transportation (CIHT)* 2000 publication '*Guidelines for Providing for Journeys on Foot*' suggests that, for commuting residents, up to 500m is the desirable walking distance, 1,000m is an acceptable walking distance and 2,000m is the preferred maximum walking distances to public transport. Whilst Mitcham Eastfields railway station is just outside the PTAL threshold walking distance of 960m, it is acknowledged that the walk distance is still less than 1,000m and as such there would be a perception and willingness amongst residents that this transport node is within an acceptable walk distance from where they live.
10. All distances have been measured using the Google Maps 'measure distance' tool rather than using the 'directions from here' and 'directions to here' option as the latter is not considered to be as accurate as drawing the route using 'measure distance'.
11. The measurements have taken account of the alignment of footways and the use of staggered pedestrian crossings as well as utilising public rights of way as appropriate if these are shorter than the footway adjacent to the carriageway. Notably for this area this includes:
 - Western Road, which runs from the Site to Holborn Way/Raleigh Gardens;
 - Upper Greenway linking with the footway of Majestic Way via St Marks Road;
 - A footway from St Marks Road to Laburnum Road onto Eastfields Road.
 - For Belgrave Walk tram stop, walking via Field Gate Lane, Miles Road, crossing Church Road at the zebra crossing;
 - Illingworth Road onto Belgrave Walk via White Bridge Avenue arriving at Belgrave Walk tram stop.
12. The routes highlighted in yellow in **Figures 1.3 & 1.4** facilitates the shortest route to Mitcham Eastfields Railway station and Belgrave Walk tram stop, respectively.

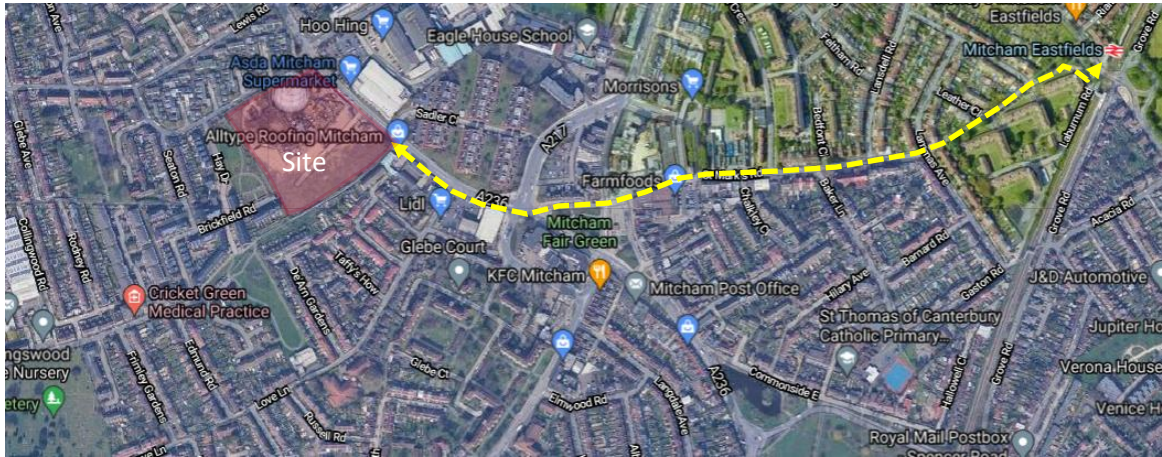


Figure 1.3 – Walking route to Mitcham Eastfields Railway Station

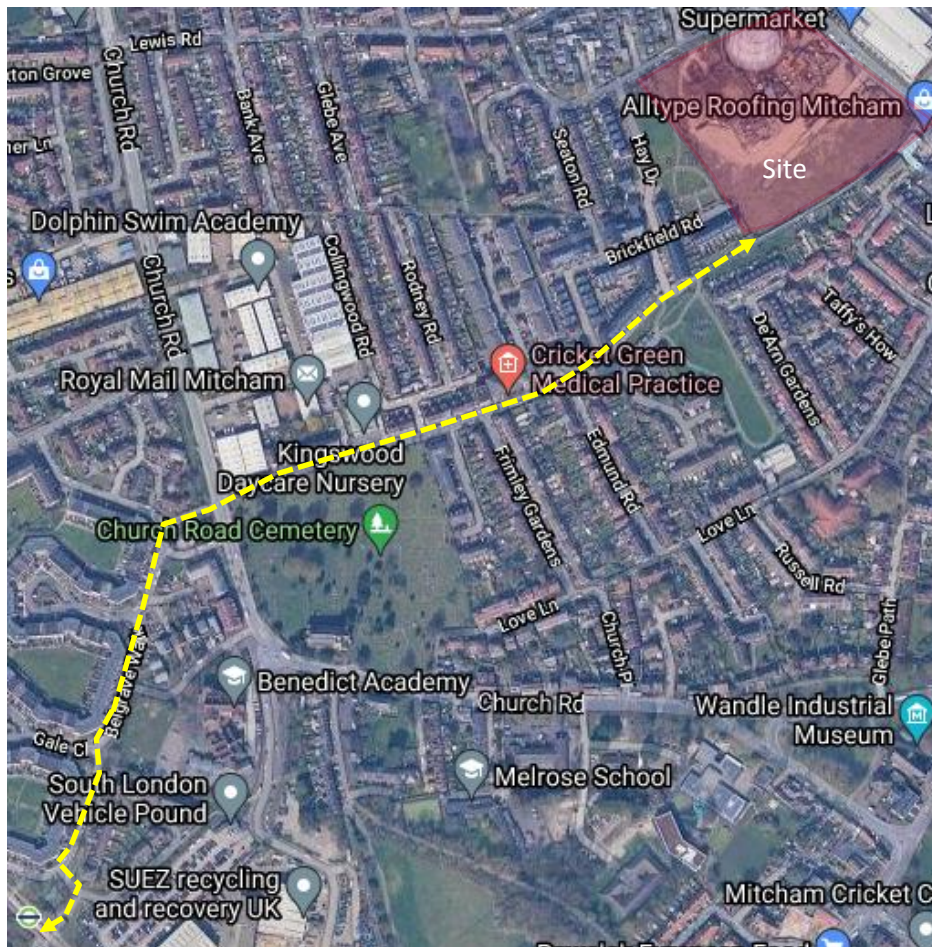


Figure 1.4 - Walking route to Belgrave Walk Tram Stop

13. On the basis of the data shown above, it is clear that undertaking a manual PTAL calculation using the measured distances would be worthwhile to get a more accurate picture of the accessibility of the site.

c. Manual Calculation

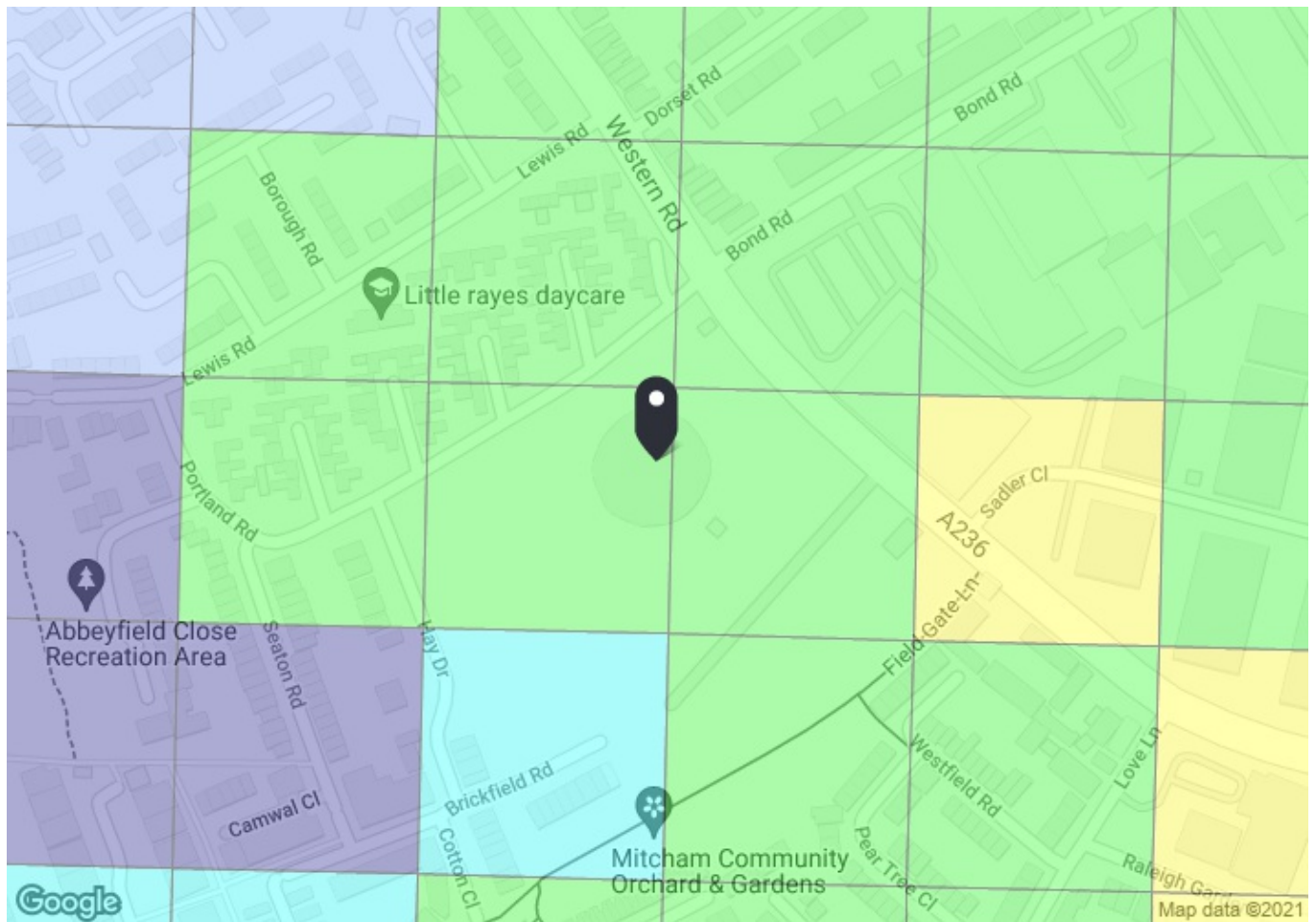
14. Utilising a spreadsheet, which calculates the PTAL using the standard PTAI calculation methodology, a site specific PTAL rating has been obtained. This shows that the walk distance for Belgrave Walk tram stop at 910m, whilst Mitcham Eastfields railway station is marginally over the upper limit of 960m increases the PTAI from 12.24 to 19.86, which takes it from a PTAL 3 to PTAL 4 and close to a 5 rating.

15. A copy of the spreadsheet is included at **Appendix A2**, and an electronic copy will also be provided in order that the calculations can be verified.
16. On the basis of this, it is considered that any decisions on the redevelopment of this site should consider that the PTAL rating is 4 (good) with a high score which is not far short of a PTAL 5 score.

d. Summary and Conclusions

17. Icen Projects Ltd has been instructed by St William Homes LLP to provide Highways and Transport advice for their proposed redevelopment of Mitcham Gasworks site.
18. The applicant is keen to understand whether the formal PTAL rating of 3 could include the Belgrave Walk tram stop and the Mitcham Eastfields railway station in the calculation recognising that the railway station public transport node which are just outside the threshold of 960m is not accounted for. Having reviewed the PTAL summary the sustainability of the Site increase from a mid-range PTAL 3 to a high PTAL 4, just below a PTAL 5 threshold, as a result of a manual calculation being undertaken.
19. Using distances measured on Google maps from the eastern corner of the site to Mitcham Eastfields railway station and the southwestern corner to Belgrave Walk tram stop, it has been demonstrated that the site has a PTAL rating of a high 4 and it is considered that this should be taken into account when determining the sites connectivity and access to sustainable transport.

A1. TFL PTAL CALCULATION



PTAL output for Base Year 3

Sadler Close, Mitcham CR4 3FL, UK
Easting: 527390, Northing: 169164

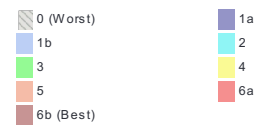
Grid Cell: 29031

Report generated: 10/09/2021

Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Map key - PTAL



Map layers

 PTAL (cell size: 100m)

Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	WESTERN ROAD [REDACTED] ROAD	152	215.16	5	2.69	8	10.69	2.81	1	2.81
Bus	MITCHAM UPPER GREEN	355	513.32	5	6.42	8	14.42	2.08	0.5	1.04
Bus	MITCHAM UPPER GREEN	127	513.32	4	6.42	9.5	15.92	1.88	0.5	0.94
Bus	MITCHAM UPPER GREEN	270	513.32	6	6.42	7	13.42	2.24	0.5	1.12
Bus	MITCHAM UPPER GREEN	264	513.32	6	6.42	7	13.42	2.24	0.5	1.12
Bus	MITCHAM UPPER GREEN	S1	513.32	4	6.42	9.5	15.92	1.88	0.5	0.94
Bus	MITCHAM UPPER GREEN	118	513.32	5	6.42	8	14.42	2.08	0.5	1.04
Bus	MITCHAM UPPER GREEN	201	513.32	4	6.42	9.5	15.92	1.88	0.5	0.94
Bus	MITCHAM UPPER GREEN	280	513.32	6	6.42	7	13.42	2.24	0.5	1.12
Bus	MITCHAM RALEIGH GARDENS	200	546.86	7.5	6.84	6	12.84	2.34	0.5	1.17
Total Grid Cell AI:										12.24

A2. MANUAL PTAL CALCULATION

PTAL REPORT

Site Details	
Description:	Standard PTAL calculation
Coordinates	527445 169152
Date:	13/09/2021

Calculation Parameters	
Day of Week:	M-F
Time Period:	AM Peak
Walk Speed:	4.8
Bus Walk Access Time (mins):	8
BUS Reliability Factor:	2
LU Max. Walk Access Time (mins):	12
LU Reliability Factor:	0.75
Rail Walk Access Time (mins):	12
Rail Reliability Factor:	0.75

Standard calculation

This is a standard PTAL calculation for a sample location.

Data			Calculations							
A	B	C	D	E	F	G	H	I	J	K
Mode	Stop	Route	Distance (meters)	Frequency (vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	WESTERN ROAD SADLER CLOS	152	82.98	5	1.04	8.00	9.04	3.32	1	3.32
Bus	MITCHAM UPPER GREEN	355	323.15	5	4.04	8.00	12.04	2.49	0.5	1.25
Bus	MITCHAM UPPER GREEN	127	323.15	4	4.04	9.50	13.54	2.22	0.5	1.11
Bus	MITCHAM UPPER GREEN	270	323.15	6	4.04	7.00	11.04	2.72	0.5	1.36
Bus	MITCHAM UPPER GREEN	264	323.15	6	4.04	7.00	11.04	2.72	0.5	1.36
Bus	MITCHAM UPPER GREEN	S1	323.15	4	4.04	9.50	13.54	2.22	0.5	1.11
Bus	MITCHAM UPPER GREEN	118	323.15	5	4.04	8.00	12.04	2.49	0.5	1.25
Bus	MITCHAM UPPER GREEN	201	323.15	4	4.04	9.50	13.54	2.22	0.5	1.11
Bus	MITCHAM UPPER GREEN	280	323.15	6	4.04	7.00	11.04	2.72	0.5	1.36
Bus	MITCHAM RALEIGH GARDENS	200	356.68	7.5	4.46	6.00	10.46	2.87	0.5	1.43
LU										
LU										
LU										
LU										
LU										
LU										

Rail	Eastfields	'WIMBLDN-LDNBDC 2E62'	980	1.67	12.25	18.71	30.96	0.97	0.5	0.48
Rail	Eastfields	'BEDFDM-SUTTON 1O13 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'LUTON-SUTTON 2O17 '	980	0.67	12.25	45.53	57.78	0.52	0.5	0.26
Rail	Eastfields	'STALBCY-SUTTON 2O21 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'STALBCY-SUTTON 2O29 '	980	0.67	12.25	45.53	57.78	0.52	0.5	0.26
Rail	Eastfields	'SUTTON-STALBCY 2V02 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'SUTTON-STALBCY 2V08 '	980	0.67	12.25	45.53	57.78	0.52	0.5	0.26
Rail	Eastfields	'SUTTON-BEDFDM 2V16 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'SUTTON-KNTSHTN 2V20 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'VICTRIC-SUTTON 2B90 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'SUTTON-VICTRIC 2B91 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'HORSHAM-VICTRIC 2E03'	980	1	12.25	30.75	43.00	0.70	0.5	0.35
Rail	Eastfields	'DORKING-VICTRIC 2E07'	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'HORSHAM-VICTRIC 2E09'	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'EPSM-VICTRIC 2E11 '	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'HORSHAM-VICTRIC 2E13'	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14
Rail	Eastfields	'VICTRIC-HORSHAM 2E14'	980	0.33	12.25	91.66	103.91	0.29	1	0.29
Rail	Eastfields	'VICTRIC-EPSM 2E16 '	980	1	12.25	30.75	43.00	0.70	0.5	0.35
Tram	Mitcham	Wimbledon-New Addington	910	8	11.38	4.50	15.88	1.89	0.5	0.94
Rail	Eastfields	'DORKING-VICTRIC 2E17'	980	0.33	12.25	91.66	103.91	0.29	1	0.29
Rail	Eastfields	'GUILDFD-VICTRIC 2E95'	980	0.33	12.25	91.66	103.91	0.29	0.5	0.14

PTAL	Access Index range	Map colour
0 (worst)	0	
1a	0.01 – 2.50	
1b	2.51 – 5.0	
2	5.01 – 10.0	
3	10.01 – 15.0	
4	15.01 – 20.0	
5	20.01 – 25.0	
6a	25.01 – 40.0	
6b (best)	40.01 +	

Sum of AI's

PTAL

19.86

4

A2. TFL BUS CAGE CORRESPONDENCE

Subject: FW: Bus Cage - Western Road, Mitcham

From: [REDACTED]@TfL.gov.uk>
Sent: 15 December 2021 14:28
To: [REDACTED]@iceniprjects.com>
Cc: [REDACTED]@iceniprjects.com>
Subject: RE: Bus Cage - Western Road, Mitcham

Hello,

So I spoke to the TfL Service Delivery Manager for Merton and If the drawings are accurate 23M should be sufficient.

As stated before, I would suggest you contact Merton council as this would now be up to them to make the final decision if they are also happy for this and arrange for the work to be done.

Regards

[REDACTED]
Asset Operations Officer – Kingston | Merton | Richmond
 **TRANSPORT FOR LONDON**
Surface Transport | Network Management Directorate
Apollo House | 1st floor | 66a London Road | Morden London SM4 5BE
[REDACTED]
<https://streetcare.tfl.gov.uk>



EVERY JOURNEY MATTERS

From: [REDACTED]@iceniprjects.com>
Sent: 15 December 2021 11:30
To: [REDACTED]@TfL.gov.uk>
Cc: [REDACTED]@iceniprjects.com>
Subject: RE: Bus Cage - Western Road, Mitcham

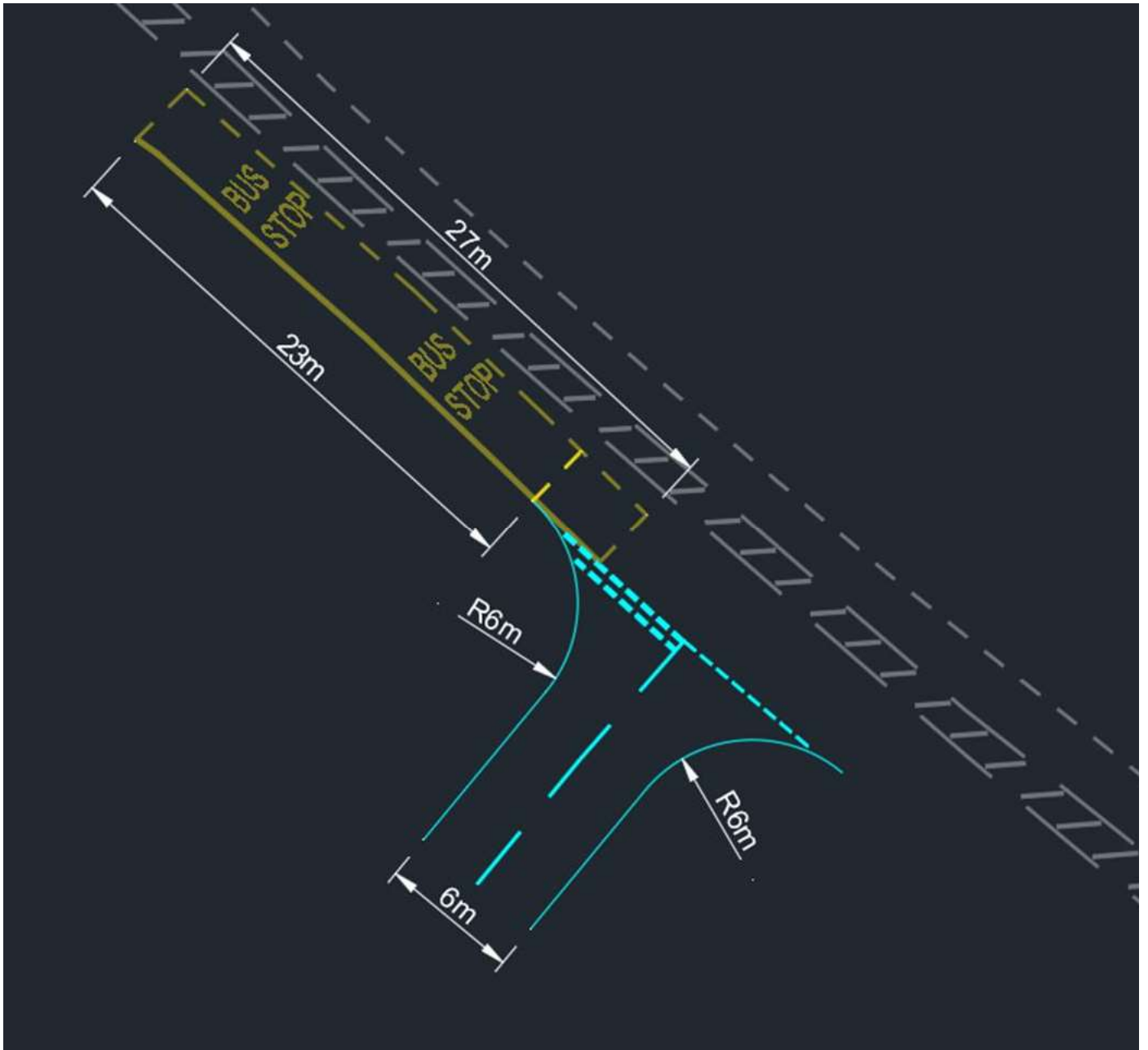
Hi [REDACTED]

Thank you for looking into this for us, and your responses in regard to the bus cage length. We've taken a look at the bus cage relative to the site access, and 27m looks to be just slightly too long in relation to the access position (please see the below screenshot).

Would you be open for a further reduction in length to 23m which ends at the access radii (also outlined in the below screenshot).

This would also be in keeping with bus stops seen within proximity of this one, both up and down stream on Western Road, that look to be between 21m and 23m in length.

Alternatively, would the slight overhang of the bus stop over the access instead be acceptable?



Many thanks in advanced,

[Redacted]

[Redacted]
Engineer, Transport

[Redacted]
[Redacted]



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From: [REDACTED] [\[REDACTED\]@TfL.gov.uk](mailto:[REDACTED]@TfL.gov.uk)>

Sent: 10 December 2021 12: [REDACTED]

[REDACTED] <[REDACTED]>

Subject: RE: Bus Cage - Western Road, Mitcham


Hello,

We looked into this and spoken to the TfL Service Delivery Manager for Merton who confirmed that he can see no reason why the cage cannot be shortened to the Standard 27meters.

If Merton (Council) are happy for this to happen also then it would be up to Merton council to arrange the change.

We have contacted Merton Council and explained we would be OK with this I would suggest you contact them for they change as this would now be up to them to make the final decision and arrange for the work to be done.

Regards

[REDACTED]
Asset Operations Officer – Kingston | Merton | Richmond
 **TRANSPORT FOR LONDON**
Surface Transport | Network Management Directorate
Apollo House | 1st floor | 66a London Road | Morden London SM4 5BE
[REDACTED]
<https://streetcare.tfl.gov.uk>



EVERY JOURNEY MATTERS

From: [REDACTED] [\[REDACTED\]@iceniprojects.com](mailto:[REDACTED]@iceniprojects.com)>

Sent: 29 November 2021 14:44

To: [REDACTED] [\[REDACTED\]@TfL.gov.uk](mailto:[REDACTED]@TfL.gov.uk)>

Cc: [REDACTED] [\[REDACTED\]@iceniprojects.com](mailto:[REDACTED]@iceniprojects.com)>; [REDACTED] [\[REDACTED\]@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk); [REDACTED] [\[REDACTED\]@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)>

Subject: RE: Bus Cage - Western Road, Mitcham

Hi [REDACTED]

Thank you for the update.

Please see the attached access drawing which demonstrates the position in relation to the existing bus cage.

Many Thanks

Engineer, Transport



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From: [REDACTED] [@TfL.gov.uk](mailto:[REDACTED]@TfL.gov.uk)>

Sent: 29 November 2021 16:25

To: [REDACTED] [@iceniprojects.com](mailto:[REDACTED]@iceniprojects.com)>

Cc: [REDACTED]

Subject: RE: Bus Cage - Western Road, Mitcham

Hello,

We are currently investigating this what would help while we are awaiting update is:

Q: Where are you wanting to move the entrance too or if you are widening the existing entrance?

Specific details would assist with options and then once we know that and have a response from internal department we can ask the borough if they are ok with it and then update you.

regards

[REDACTED]
Asset Operations Officer – Kingston | Merton | Richmond

 **TRANSPORT FOR LONDON**

Surface Transport | Network Management Directorate

Apollo House | 1st floor | 66a London Road | Morden London SM4 [REDACTED]

<https://streetcare.tfl.gov.uk>



EVERY JOURNEY MATTERS

[REDACTED]

From: [REDACTED]
Sent: 06 January 2022 00:10
To: [REDACTED]
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Can you please confirm that we can go ahead with the meeting on Tuesday? If there are any issues, please let me know.

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 03 January 2022 14:18
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Thanks for letting me know and I saw the update to the Teams invite too. I've let the team know and will come back and confirm tomorrow so we can get an agenda out etc.

Thanks,

[REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 30 December 2021 07:50
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

I have just been advised that we do not have an urban designer or a TfL planner available for the meeting on Tuesday so we will need to reschedule.

I appreciate this was your initial suggestion so I do apologise for the fuss. I will reach out to the planning support team to work out a suitable time with you – hopefully the following week.

Kind regards,

Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED]
Sent: 21 December 2021 14:33
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Thanks for sending this through. The pre-app has not yet been allocated to a TfL and urban design officer. I will send through an agenda with the list once it has.

Kind regards,

Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 21 December 2021 14:20
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Do you have a list of the other attending officers from GLA / TfL for the meeting on 4 Jan?

Thanks,

[REDACTED] | Associate

[REDACTED]
[REDACTED]
[REDACTED] 6

From: [REDACTED]
Sent: 21 December 2021 09:38
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Thanks [REDACTED] The list of attendees has now been confirmed from our side and is as follows:

- ☐ [REDACTED] St William Homes
- ☐ [REDACTED] les, St William Homes
- ☐ [REDACTED] WSP (planning)
- ☐ [REDACTED] WSP (planning)
- ☐ [REDACTED], Rolfe Judd (architects)
- ☐ [REDACTED] s, Gillespies (landscape architects)
- ☐ [REDACTED] Icen Projects (transport)

Best regards,

[REDACTED] | Associate
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 20 December 2021 13:02
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

The meeting will be held on Teams. An invite with a link was previously sent but I have also included below:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_MGE1ZDM5YjltNTk0Yy00Y2U4LWlzMtNtNGEwY2ZmZGRiYzY4%40thread.v2/0?context=%7b%22Tid%22%3a%2230653dea-fb01-4b4c-8ddf-c183f89febf%22%2c%22Oid%22%3a%22afa93234-ab65-4131-ad0a-640af847ca6d%22%7d

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED]@london.gov.uk

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From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 20 December 2021 10:30
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Thanks [REDACTED] I will confirm attendees and send over the transport note as soon as possible this week. Can you confirm that the meeting will be done virtually and by what application (zoom/teams/other)?

Thanks,

[REDACTED] | Associate
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 16 December 2021 13:31
To: [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Unfortunately [REDACTED] and I do not have any availability for the following week so we will have to keep it as 4 January. I will be working through the Christmas and New Year period so will be available for any questions.

Please forward the transport note as soon as you can and I will forward to my colleagues at TfL to review ahead of the meeting.

A typical pre-app meeting agenda would look like the below and distributed a few days before the meeting with a list of attendees. Please let me know who is attending when you can.

1. Introductions (10 minutes)
2. Presentation of the scheme by applicant team (30 minutes)
3. Principle of development (5 minutes)
4. Affordable housing (5 minutes)
5. Urban design (20 minutes)
6. Sustainable development (5 minutes)
7. Transport (15 minutes)
8. Summary, timetable for application, and next steps

Kind regards,

[REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED]@london.gov.uk

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From: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Sent: 16 December 2021 11:18
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

Thanks for your email. I will be able to confirm on attendance from project team shortly. We are holding separate pre-application discussions with the Council so are proposing that this first meeting is solely GLA officers and the project team.

In terms of the date proposed, obviously this is the first day back after the Christmas break/bank holidays. Would you have any other available dates, say the following week? If not, we will go with the 4 January, however it would be good to understand if there was any availability, say 11/12 January, as this could work better?

We submitted our cover letter and design document via the pre-application online portal and we are not intending to submit further design or planning. We are preparing a Transport Note that we hope to be able to share with you at the end of this week or early next week to aid discussions.

Thanks,

[REDACTED] [REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED] 6

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 15 December 2021 11:46
To: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Cc: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Subject: RE: Proposed Date for Pre-application Meeting Mitcham Gasworks

Hi [REDACTED]

No problem – I am happy to send an agenda to you earlier.

Can you please provide a list of who will be attending the meeting and if you would like the Council to attend?

Can you also please advise if you are providing any additional information between now and the meeting?

Kind regards,

[REDACTED] [REDACTED]
Strategic Planner – Development Management
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL
Email: [REDACTED]@london.gov.uk

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From: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Sent: 15 December 2021 09:51
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Subject: FW: Proposed Date for Pre-application Meeting Mitcham Gasworks

Good morning [REDACTED]

I hope you are well and good to be put in contact with you. I understand from our pre-application meeting invite that you are the allocated case officer for this pre-application request?

I and my colleague [REDACTED] (cc'd) are the planning consultants for the application. We are just consulting with the project team on attendance to the 4 January but will hopefully be able to confirm attendance shortly. In the meantime, perhaps it would be helpful to touch base with either of us to discuss an agenda and information ahead of the meeting this week? Given the meeting is the first day back after the Christmas break.

Look forward to hearing from you.

Best regards,

[REDACTED] [REDACTED] | Associate

[REDACTED]

[REDACTED]

[REDACTED]

From: Greater London Authority <planningsupport@london.gov.uk>
Sent: 14 December 2021 13:22
To: [REDACTED] [REDACTED] <[REDACTED]@wsp.com>
Subject: Proposed Date for Pre-application Meeting Mitcham Gasworks

Dear [REDACTED]

GLA reference number: 2021/1203/P2I

Site name: Mitcham Gasworks

Address: Former Mitcham Gas Holder Site Western Road Mitcham CR4 3EQ

Local Planning Authority: Merton

Proposal: Residential-led, mixed use development comprising around 700 residential homes, residential amenities including communal work from home facilities and a crèche subject to demand for operators.

On 25/11/2021 the GLA Development Management Team received your request for a Level 2 meeting for the above pre-planning application proposal. The case officer assigned to this case is [REDACTED] [REDACTED]

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future

planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice response you will receive will only address issues that you have sent documentation on. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

Cancellation


If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior to the date agreed. The fee is non-refundable on cancellation.

Proposed meeting date

We can offer a tentative date and time of **4th January 2022 10.00-12.00.**

Please let us know if this is acceptable and who will be attending.

Regards


Planning Support Team
Greater London Authority
pre-applications@london.gov.uk

[REDACTED]

From: [REDACTED] <[REDACTED]@wsp.com>
Sent: 06 January 2022 12:10
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2021/1203 - Mitcham Gasworks pre-app

Thank you for sharing this [REDACTED]

Now that the new date and time has been agreed, there are a couple of additions in our attendance from the design and transport side:

- ☐ [REDACTED], Rolfe Judd Architecture
- ☐ [REDACTED], Icen Projects

Look forward to meeting with you all next week.

Best regards,

[REDACTED] | Associate

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 06 January 2022 10:50

To: [REDACTED] <[REDACTED]@wsp.com>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
[REDACTED]@london.gov.uk; [REDACTED]@tfl.gov.uk>

Subject: 2021/1203 - Mitcham Gasworks pre-app

Hi all,

Please see attached agenda for the pre-app meeting on 11 January.

If you have any questions, please let me know.

Kind regards,

[REDACTED]
Strategic Planner – Development Management

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

Email: [REDACTED]@london.gov.uk

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Pre-application meeting agenda 2021/1203

Mitcham Gasworks

Local Planning Authority: Merton

meeting date: 11 January 2022

meeting time: 09:00-11:00

location: *Via Microsoft Teams (see Outlook invitation for link)*

The proposal

Residential-led, mixed use development comprising around 700 residential homes, residential amenities including communal work from home facilities and a crèche subject to demand for operators.

The applicant

The applicant is **St William Homes**, the agent is **WSP**, and the architect is **Rolfe Judd**.

Key issues for consideration and discussion at the meeting

Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion.

- 1. Introductions (10 minutes)**
- 2. Presentation of the scheme by applicant team (30 minutes)**
- 3. Principle of development (5 minutes)**
- 4. Affordable housing (5 minutes)**
- 5. Urban design (20 minutes)**
 - Design, layout, public realm and landscaping
 - Height and massing
 - Townscape impact
- 6. Sustainable development (5 minutes)**
 - Energy Strategy
 - Whole Life Cycle Carbon Assessment
 - Urban greening, biodiversity, and trees
 - Circular economy
 - Air quality
 - Drainage and water
- 7. Transport (15 minutes)**

8. Summary, timetable for application and next steps

Attendees

GLA Group

- [REDACTED] Strategic Planner, GLA
- [REDACTED] Team Leader, GLA
- [REDACTED], Urban Designer, GLA
- [REDACTED], Principal Technical Planner, TfL

Applicant team

- [REDACTED] St William Homes
- [REDACTED], St William Homes
- [REDACTED] WSP
- [REDACTED] WSP
- [REDACTED], Rolfe Judd
- [REDACTED], Gillespies
- [REDACTED], Icen Projects