

Please find copies of our response to these important draft Supplementary Planning Documents attached.

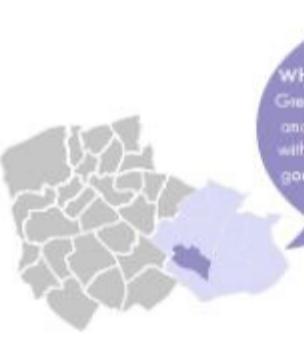
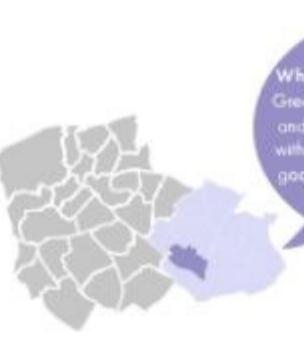
They are both very welcome initiatives which could do much to improve the quality and design of new development.

The Character Study lacks the detail necessary to do justice to the richness of local character in Cricket Green and Mitcham. It devotes just 103 words to describing Cricket Green's Character which compares poorly to the 1,493 used in the Cricket Green Character Study prepared in 2012 which was never finalised and is now being discarded.

We also support Mitcham Society's representations to recognise "Mitcham Village" as one of the Borough's 36 neighbourhoods - this captures the essence of the neighbourhood's character in the manner necessary to inform an appropriate scale and type of change. This change was recognised by the Borough Plan Advisory Committee.

We have published a blog on the issues arising which can be viewed here <https://mitchamcricketgreen.org.uk/2021/03/20/capturing-cricket-greens-character/>

Our representations include detailed changes to the text proposed for Cricket Green and we commend these to you:

TRACKED CHANGES	AMENDED TEXT
<p> </p> <p>CRICKET GREEN</p> <p>Distinctiveness - heritage and key features</p> <ul style="list-style-type: none">• Area centres on the historic Cricket Green (<u>where the game has been played every year since 1685</u> as early as 1707) and <u>the exceptional</u> quality of development from different periods around it• <u>Mainly residential</u>; <u>Significant civic</u> and institutional presence and modest scale and informal layout of buildings; <u>larger plot sizes to southwest and low rise institutional buildings to north</u>• <u>Majority lies</u> each <u>of the area is</u> within the Mitcham Cricket Green Conservation Area <u>and a high density</u> – <u>number</u> of listed and locally listed buildings including Mitcham Parish Church, <u>Mitcham Court</u>, <u>Mitcham Cricket Pavilion</u> and <u>The Canons House & dovecote</u>• <u>Unifying</u> Sense of openness and small scale character – semi rural in parts with <u>mature trees, a complex network of registered Town Greens and other green spaces and sensitive lighting</u> its green spaces all key to its character• Housing varied in scale from <u>high quality residential blocks</u> blocks of flats to 1930s <u>detached</u> housing and small scale Victorian cottages <u>and terraces</u>• key issues / opportunities• <u>Heavy traffic along London Road, Church Rd and Madeira Rd</u>• <u>New and enhanced pedestrian routes providing new links and reducing severance caused by heavy traffic</u>; <u>Pedestrian movement between open spaces hampered by the roads</u>• Sensitive infill opportunities that reinforce historic <u>setting</u> <u>character</u> and strengthen key views into the <u>Conservation Area</u>• Reveal significance of <u>Tramway Path</u>; <u>Cricket Green's story and strengthen Conservation Area identity through quality of new development, tree planting and public realm</u>• <u>Explore opportunities to Sustain shopping parades and bring vacant pubs on Cricket Green back into good use</u>• <u>Repurpose institutional buildings and grounds and heritage buildings at risk without damaging historic character</u>	<p> </p> <p>CRICKET GREEN</p> <p>Distinctiveness - heritage and key features</p> <ul style="list-style-type: none">• Area centres on the historic Cricket Green (where the game has been played every year since 1685) and the exceptional quality of development from different periods around it• Significant civic and institutional presence and modest scale and informal layout of buildings• Majority lies within Mitcham Cricket Green Conservation Area and a high density of listed and locally listed buildings including Mitcham Parish Church, Mitcham Cricket Pavilion and The Canons house & dovecote• Unifying sense of openness and small scale character – semi rural in parts with mature trees, a complex network of registered Town Greens and other green spaces and sensitive lighting all key to its character• Housing varied in scale from high quality residential blocks to 1930s housing and small scale Victorian cottages and terraces• key issues / opportunities• New and enhanced pedestrian routes providing new links and reducing severance caused by heavy traffic• Sensitive infill opportunities that reinforce historic character and strengthen key views in the Conservation Area• Reveal significance of Cricket Green's story and strengthen Conservation Area identity through quality of new development, tree planting and public realm• Sustain shopping parades and bring vacant pubs back into good use• Repurpose institutional buildings and grounds and heritage buildings at risk without damaging historic character

Thanks

Secretary

Mitcham Cricket Green Community & Heritage

For the benefit of Mitcham Cricket Green
Conservation Area and its environs

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Conservation Area and its environs

DRAFT MERTON CHARACTER STUDY Response from Mitcham Cricket Green Community & Heritage March 2021

1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs. We are the civic society for this part of Merton and part of the wider civic movement through membership of the national charity Civic Voice. We have been closely involved in the development of the Merton Local Plan, the Conservation Area Appraisal and Management Plan, The Canons Supplementary Planning Document and numerous development proposals in the area. Our approach to development and change in the area is established in the [Cricket Green Charter](#) which was refreshed in 2019 with the support of London Borough of Merton and local councillors. The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We have also contributed to production of the Merton Heritage Strategy as a member of the Merton Heritage Forum. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run Mitcham Heritage Day and Community on the Green.

2. We warmly welcome the production of a Character Study for Merton and the intention to adopt it as a Supplementary Planning Document (SPD). It is an essential complement to the Local Plan and one we have identified as a priority for many years. It is one, but only one, of the range of design tools and processes now expected by Government policy. To be effective the Merton Character Study also needs (a) strengthened Local Plan policies and site allocations (including drafting the key section of Strategic Policy LP D5.1 so it makes grammatical sense instead of "*The council will require all development to be of the highest design quality long-term economic prosperity and quality of life*"); (b) the development and use of a wider range of design tools and processes by Merton Council, including local design guides, masterplans and design codes, (c) improved arrangements for Design Review, and (d) training and development of design literacy in planning and highways officers and members of the Planning Applications Committee. We have identified some opportunities for this in and around Cricket Green in the Cricket Green Charter and our [representations on the draft Merton Local Plan](#). Effective delivery of the Character Study will require a sea change in Merton's culture for securing quality design, early community engagement and addressing local preferences. We encourage Merton Council to invest in the delivery of this sea change over the period of the next Local Plan and it will require much more than the simple publication of the Character Study.

3. We have contributed to earlier iterations of this work, notably the development of the Borough Character Study between 2011 and 2015. This produced draft character studies for 22 out of 36 character areas. These studies were of a high standard and provided significantly more detail than the current draft. We urge that this work is not lost and that it is more effectively used in the revised study.

4. Through these representations we ask Merton Council to strengthen the Character Study by:

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- Provide much fuller descriptions of each individual neighbourhood's character, including by making better use of the earlier work invested in articulating local character through Conservation Area Appraisal and Management Plans and the Borough Character Study developed between 2011 and 2015 which will otherwise be discarded
- Drop the overly simplistic and potentially damaging categorisation of neighbourhoods on a spectrum from reimagine to repair
- Ensuring the Character Study is better informed by local preferences, as required by Government policy
- Renaming the "Mitcham" neighbourhood as "Mitcham Village"
- Supporting our detailed changes to the proposed description for Cricket Green

Overall approach

5. We welcome the approach to using 36 neighbourhoods and recognising that they do not always have distinct boundaries and there are many blurred edges. An example is the boundary between Mitcham Village and Cricket Green.

6. While it is helpful to set the assessment of each neighbourhood in context we urge that the limited resources available to develop this SPD are now focused on providing new insights and rigorous evidence which is bespoke to each neighbourhood. Only one third of the document addresses the character of the 36 neighbourhoods and much of the rest of the document provides only generic information or information of only general interest. The primary value of the study lies in the bullet points attributing "*Distinctiveness – heritage and key features*" to each neighbourhood and how these will inform development choices and decisions. The level of detail provided in these bullet points is so scant that it calls into question the value of the document. As one example, the richness and diversity of Cricket Green's character is described in just 103 words. It is self-evident that this is inadequate. It compares poorly to the 1,493 words used in the character study prepared in 2012 which Merton Council seems prepared to abandon. We urge that the strengthening of this aspect of the study is made a priority in finalising the document. We would be happy to see some of the other information provided as annexes or elsewhere.

7. We do not support the overly simplistic categorisation on page 39 of the different neighbourhoods into a spectrum ranging from areas to be re-imagined to those for repair. The management of change throughout the Borough requires a much more nuanced approach. The approach also has a development focus and fails to address many of the considerations identified elsewhere in the study as contributing to local character. As a diagnostic tool we anticipate it will be regularly abused and that it will be used to justify development antipathetic to Merton's rich and diverse character. This is readily illustrated by the categorisation of both Mitcham and Church Road as areas to be reimagined. We recognise there are reimagining opportunities within them, including Benedict Wharf, Phipps Bridge and Sibthorpe Road car park, but the majority of both character areas demands a much more sensitive approach that strengthens and re-enforces existing character.

8. Character assessment should play an important role in ensuring community views and preferences are embedded in planning and design considerations. This is an expectation of Government policy. The process for preparing the draft character study has failed to achieve this for Merton's residents and businesses. Local community voices have been asking for stronger involvement in the development of the character studies since the 2011-15 process but despite this no opportunities have been provided. Instead, Merton's community was offered a draft study reliant on external consultants

with inevitably limited local knowledge and insight and they have applied a formulaic approach which lacks the local detail and insight necessary for the work to influence planning decisions. Moreover, much of the limited local insight that is provided appears to have been informed largely by priorities already expressed by Merton Council and it owes little to those of the community.

9. A poor quality online survey and a poorly attended online event generated only limited interest. More than 20 neighbourhoods received comments from fewer than ten people. We question the reach of the process to Merton's diverse population and how well it has addressed disparities in levels of community engagement across the Borough. As a result the draft document owes little to the knowledge and insight of local people and local preferences and, as we identify below, the document also includes both errors and anomalies as a result. The limited input also questions the validity of the radar diagrams used for each of the 36 neighbourhoods. We do not find these summaries are either robust or useful to the study.

10. The assessment of each neighbourhood identifies a series of bulleted "key issues/opportunities". The genesis of these is unclear and there is a lack of consistency in approach. Many of the proposals appear to be little more than random suggestions that should have no place in an SPD and other obvious opportunities are missing. The individual proposals may have merit but they need much more consideration before being included – examples include:

- Mitcham Common – "*Explore provision of food outlet / pop-up coffee van or café*" – an interesting idea but one of many
- Rowan Road - "*Loss of front gardens to parking*" – an issue in multiple neighbourhoods
- Cricket Green – "*Reveal significance of Tramway Path*" – an interesting idea (which we have also stressed) but one of many
- Church Road – no mention of opportunities from departure of waste transfer station or renewal of Phipps Bridge
- Mitcham Common – no mention of opportunities for improving wildlife habitat or improving public health and wellbeing from healthy walks and volunteer conservation activity

11. We propose use of the Cricket Green Charter and Mitcham Cricket Green Conservation Area Appraisal and Management Plan as more robust sources of relevant issues/opportunities.

12. Where relevant the document should reference and explain the relationship with other SPDs, including Conservation Area Appraisal and Management Plans and The Canons Conservation Management Plan. These provide considerably more detail than the Merton Character Study and should prevail. As a minimum they should be cross-referenced.

Mitcham sub area

13. We agree with the broad definition of the Mitcham sub area. The introductory text demonstrates a general understanding of the area and emphasises some familiar tropes, such as Mitcham lavender. Mitcham's horticultural and growing traditions are much richer and more diverse than this and the character study should avoid re-enforcing simplistic and over-used descriptions of Mitcham's story. It should also avoid hype and a promotional style more usually found in commercial literature, such as "*Mitcham is leading the way in providing new, award-winning sustainable forms of development, like at Brenley Park and along Rowan Road*". The text should avoid phrases that lack public understanding – we don't recognise the term "*'yokey' spaces*" and it's a term that eludes a Google search. We do not recognise "*Mitcham tennis courts*" as the name of any facility in the sub area.

14. The introduction to the Mitcham sub-area is correct that "*the area is characterised by a string of green spaces*" but this text needs to be strengthened specifically to acknowledge the unique nature of Mitcham's network of green spaces, comprising registered Town Greens and the special status of Mitcham Common established under its own legislation.

Mitcham Village

15. We support Mitcham Society's representations on the Character Study. We strongly endorse the approach developed during the public consultation explicitly to recognise "Mitcham Village" as a neighbourhood. This captures the essence of the neighbourhood's character in the manner necessary to inform an appropriate scale and type of change. This change from "Mitcham" to "Mitcham Village" was recognised by the Borough Plan Advisory Committee on 26 November 2020. This meeting was also presented with a change in name from "Wandle" to "Mitcham Bridge" and this change has been included in the draft study. The change to "Mitcham Village" should also be made. It is also illogical to name both a sub-area and a neighbourhood as "Mitcham". Additionally, the draft study makes six separate references to "Mitcham town" which need to be changed to recognise Mitcham as a "Village".

Church Road

16. The opportunity resulting from the departure of the waste transfer station at Benedict Wharf and the renewal of Phipps Bridge estate is a glaring omission from this section. The reference to the "Wandle Valley" Conservation Area should also include "Mitcham Cricket Green Conservation Area" as the neighbourhood includes both. The striking contribution of Mitcham parish church and its notable and extensive churchyard to the character of the neighbourhood should be addressed. The opportunities for improved permeability from Church Road to London Road Playing Fields and to Mitcham Village should be identified along with the creation of a new route from London Road across London Road Playing Fields, Benedict Wharf and Phipps Bridge to Morden Hall Park and beyond.

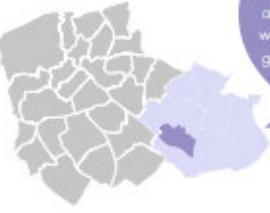
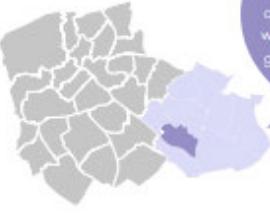
Cricket Green

17. We do not consider it sufficient to present an assessment of the character of Cricket Green in just 103 words. We ask that the work already invested in the Mitcham Cricket Green Conservation Area Appraisal and Management Plan and in the earlier character study for Cricket Green is used to inform a more detail and robust approach. These also apply to the Church Road neighbourhood and the overall approach should apply to all the other neighbourhoods which benefit from the fuller information that is available and which will otherwise be lost.

18. Notwithstanding this fundamental shortcoming we have tracked our proposed changes to the text for Cricket Green below. The amended text is just 50 words longer than the original and we commend its use. The amendments also address a critical error in the original text by recording that cricket has been played on the historic ground every year since 1685 and not 1707 as provided in the draft. This is a key consideration given the character of this neighbourhood is so enriched by it being the location of the oldest cricket ground in the world. The ideas/opportunities are informed by the Cricket Green Charter. This presents the conclusions of dialogue with local people, including a community workshop organised by Mitcham Cricket Green Community & Heritage working with the Future Merton team at Merton Council and local ward councillors. More than 5,000 households were contacted during its preparation and we believe it provides a more robust basis for the following proposals.

TRACKED CHANGES

AMENDED TEXT

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Mitcham Bridge

19. The character of Willow Lane Industrial Estate is almost entirely overlooked in the description despite it occupying a majority of the area of the neighbourhood. The opportunity for environmental enhancements and an improved public realm and walking/cycling environment within Willow Lane Industrial estate should be identified as a key issue/opportunity alongside the opportunities to protect historic industrial buildings. We have also identified the benefit of a linking bridge between Bennett's Hole Nature Reserve and Watermeads Nature Reserve in improving public access to and awareness of the Wandle and its wildlife corridor and providing new circular walking routes.