

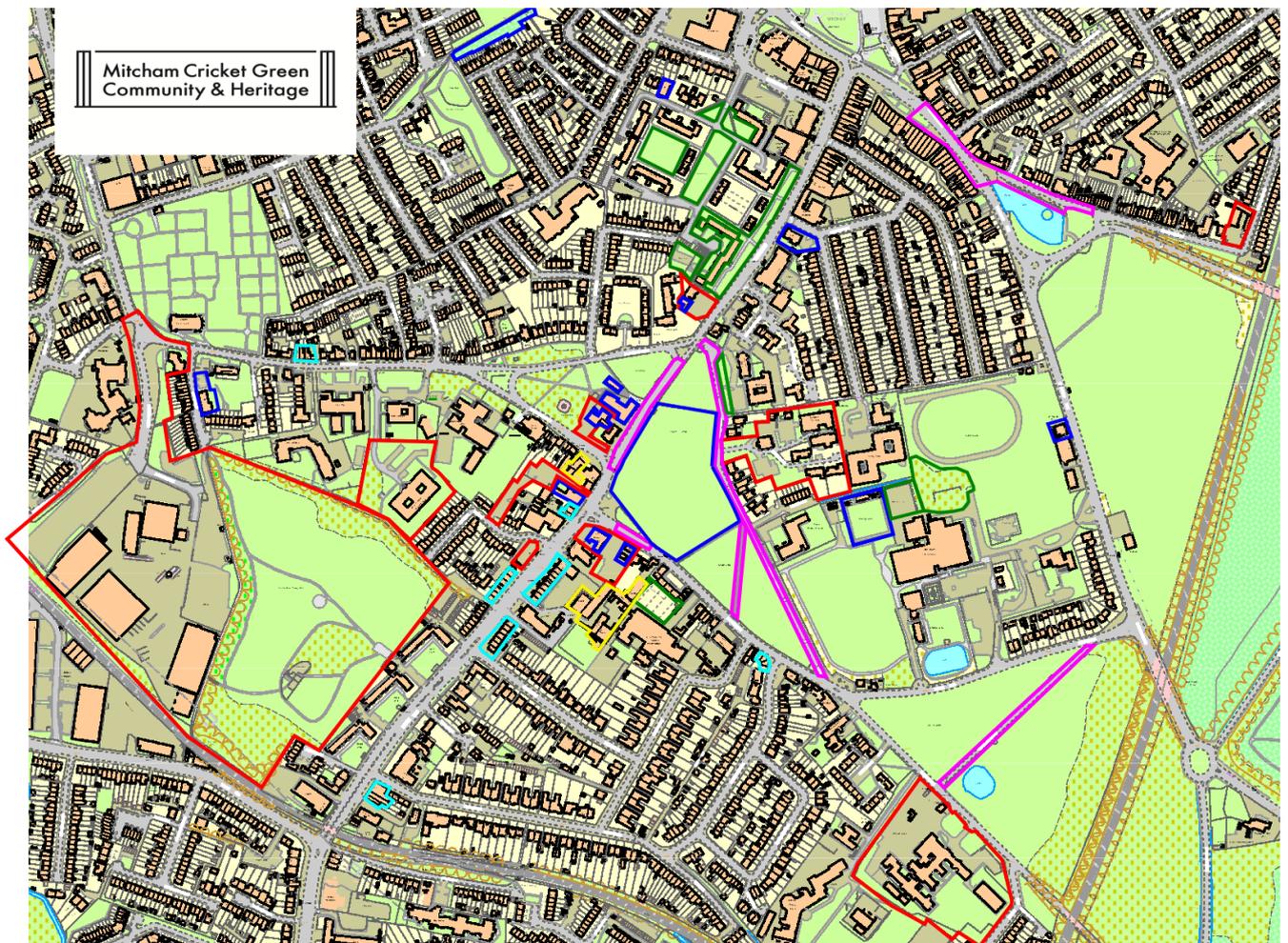
Mitcham Cricket Green Community & Heritage

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

LOCAL PLAN CONSULTATION

A response to Merton Council from Mitcham Cricket Green Community & Heritage

January 2019



Red: site allocations; Dark blue: community assets; Light blue: local shopping parades; Yellow: scattered employment sites; Magenta: Public realm improvements; Green: additional environmental designations

General enquiries: info@mitchamcricketgreen.org.uk
Web site: www.mitchamcricketgreen.org.uk
Twitter: @MitchamCrktGrn

Registered Office c/o MVSC, Vestry Hall, 336/338 London Road, Mitcham, Surrey, CR4 3UD
Company registration no. 04659164 Charity registration no. 1106859

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 Merton Council's draft Borough Character Study and the Cricket Green Conservation Area Character Appraisal and Management Plan. The Cricket Green Charter (<http://mitchamcricketgreen.files.wordpress.com/2013/04/cricket-green-charter.pdf>) established our approach to development and change in the area and was developed in partnership with London Borough of Merton, the local community and local councillors. We also undertake practical conservation work, including the cleaning and restoration of local landmarks and management of ornamental and other planting, and bring residents, businesses and organisations together to appreciate the importance of the Conservation Area and its environs.

2. We made detailed representations in January 2018 on Merton Council's call for sites and welcome the response to many of the issues we raised. We recognise the Local Plan as a critical document for the future development and conservation of the area. We are still considering whether to support a neighbourhood plan for Cricket Green and will soon be reviewing the Cricket Green Charter. Progress on the Local Plan and its effectiveness in providing a distinct approach for Mitcham will inform decisions on both these initiatives.

3. This submission addresses the draft policy content of the Local Plan as well as making further representations on key sites. We have also identified a number of policy omissions which are needed to strengthen the final document. We have identified priorities for strengthening the evidence base and work on this is needed urgently if it is to inform the Examination. We are keen to see the Local Plan address community priorities for the use of the Community Infrastructure Levy in the area. We also address a number of issues relating to delivery of the Local Plan, including the need for pre-application engagement with the community, the use of design codes and other design tools, and enforcement. We are concerned that the Plan as drafted will not be found "sound" at Examination and have made suggestions which we hope will help avoid this.

4. We have an overarching concern about the style and approach to the drafting of the planning policies. These are too often at such a level of generality that they will not help decision makers when exercising their planning judgement. We have identified some issues where this can be addressed by strengthening the evidence base, such as on local character, or by reference to agreed external standards, such as Building for Life. We also expand on the content of the Mitcham section of the plan to take it beyond generalities and add the local detail and sense of direction which is required. We think it would be helpful if each the policies were tested against the experience of development in the last five years and the failure of existing policies to prevent inappropriate development because of the perceived risk of losing an appeal or the actual loss on appeal. It is concerning that much of the policy content is unchanged from the current development plan despite the experience of poor development and the strengthening of national planning policy and the London Plan in key areas. The new Local Plan provides an opportunity to improve the policy framework and raise aspirations. We are also concerned by the lack of integration across the Local Plan with different chapters seeming too independent of each other. The lack of integration of the Plan's health and well-being objectives is especially apparent. The disjointed nature of the draft Plan is reinforced by its fragmented presentation, lack of a contents section, and unclear structure and the publication of different sections at different times. The evidence base for the Plan is also unclear and much is not available online.

Strategic Vision and Objectives

5. We support the Vision's ambitions for key locations in Mitcham Cricket Green, notably residential development at Benedict Wharf and securing Mitcham cricket pavilion in community ownership. The Vision is focused on the built environment and investment

projects. It is weak in its recognition of the need actively to sustain the historic environment and does not adequately reflect the Borough's Heritage Strategy. It is notable that the benefits of investment in The Canons house and historic landscape are not mentioned. The draft Plan is also weak on the ambitions for wildlife and lacks biodiversity targets. Wildlife is more often presented as an "issue" than an "opportunity" in the Plan. The lack of active delivery of conservation plans for key locations such as Cranmer Green Nature Reserve and Mitcham Common should be addressed through the Vision. It should also address the potential for Mitcham Common to be part of a much wider open space stretching to Beddington Park, supported by a management plan which is currently lacking. The lack of attention to the natural and historic environment carries through into the Key Diagram where they are absent. The Key Diagram also omits the Sutton Link option through Benedict Wharf.

Design

6. We welcome the clear commitment to high quality design. The period of the Local Plan will see pressure for significant intensification of development that will change the urban form in some locations. This is not fully acknowledged throughout the document and there are too many recent examples of poor quality development permitted despite the demands for quality design in the existing development plan. An example is the unimplemented permission for the former Kwik Fit site on London Road which has led to our call for the site to be removed from the Conservation Area. We anticipate significant pressure for more residential development in and around Mitcham Cricket Green Conservation Area which will be based on blocks and flats rather than streets and houses. This could fundamentally change the character of the area and put the Conservation Area at risk. This pressure demands a stronger approach to secure development outcomes that work for the local community and the natural and historic environment.

7. There are a number of ways in which the Local Plan can be strengthened by:

- Amending Policy LP D5.1 to support pre-application community consultation as advised by the National Planning Policy Framework which states that "*Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*" (NPPF, para 128). The recent contrasting experience of the proposals for development at The Cricketers and The Queen's Head demonstrates the value. The Cricketers developers did not engage with the local community and it took five different applications and three appeals to secure the final scheme. The Queen's Head developers engaged from the beginning and made significant changes which resulted in a scheme approved in months rather than years
- Providing a clear evidence base for local character against which to assess individual proposals – this is a central consideration in all of the Design policies but lacks traction in the absence of completed character studies for the Borough. We have highlighted this lacuna for several years. It is welcome that the character studies are mentioned in Policy LP D5.2 but it is a cause of some regret that the excellent work invested in drafting them has not been completed. Without these studies the character of Merton is at risk from development which will pay it little respect. The Plan needs to be supported by a commitment to their completion prior to its adoption
- Drawing on the range of design tools that are now expected by the National Planning Policy Framework (paragraph 129) – we would welcome reference to Building for Life in an amended Policy LP D5.1 (rather than vague references to "*good urban design*") and for the Plan's design ambitions to be supported by a commitment to the preparation of design codes in key locations across the borough. These should be prioritised against the level of likely change and their sensitivity – we believe Mitcham Cricket Green Conservation Area and its environs

should be a priority for a design code given the pressure for blocks and flats which could fundamentally affect its urban form over the period of the Local Plan. The Local Plan should also be supported by a refresh of Merton's Design Review Panel. The Panel's arrangements are anomalous when compared to other London boroughs and it lacks independence in its chairing and report writing.

- Establishing an expectation in an amended Policy LP D5.3 that single aspect residential flats and flats with projecting rather than recessed balconies will be permitted only exceptionally
- Strengthening Policy LP D5.3 to prevent further light pollution – the unnecessary intrusion on the Cricket Green nightscape from unnecessary external lighting in the developments at Brook House and the Cricketers provides evidence of the need for a stronger policy approach

8. We welcome reference in Policy LP D5.2 to "*maintenance and enhancement of identified important local views, panoramas and prospects and their settings and, where appropriate, create [sic] new views*". It will be necessary to identify these views and this would be aided by preparation of a Supplementary Planning Document. In the meantime we ask that the supporting text is strengthened to reference all views identified in Conservation Area Appraisal and Management Plans and the key views identified in the recent [Wandle Vistas](#) report from Wandle Valley Regional Park Trust and Wandle Valley Forum (which includes views from St Marks car park and Mitcham Common).

9. The Mitcham area benefits from an important network of historic registered town greens. These should be explicitly recognised in the list of heritage assets in paragraph 5.5.6.

10. With the growth of flats in Mitcham Cricket Green Conservation Area there is increasing visual blight from excessive use of estate agent boards. Some of this needs to be addressed through enforcement but Policy D5.6 should explicitly reference the issue. The supporting text should also include a commitment to using Regulation 7 Directions under the Town and Country Planning (control of advertisements) (England) Regulations 2007 to restrict deemed consent in sensitive locations, including Cricket Green Conservation Area.

Infrastructure

11. We welcome the commitment to social and community infrastructure. Policy In6.2's resistance to the loss of community facilities is especially welcome. There will be some circumstances where loss is inevitable and we believe the policy should be strengthened to introduce a requirement to make equivalent provision in the local area in these circumstances. The Local Plan would also be strengthened by identifying areas of deficiency in the provision of key community facilities, such as affordable community meeting spaces, and supporting development which addresses these deficiencies. Mitcham Cricket Green is an area with a deficiency in affordable community meeting spaces. We have identified community assets which should be explicitly recognised for protection that are local to Cricket Green below.

Employment

12. We broadly welcome the approach to protecting existing employment uses. The Local Plan can be strengthened by:

- Identifying local employment sites and more neighbourhood shopping parades for protection to support Policy Ec7.4 and Tc7.6 – we have identified locations in the Cricket Green area below, including for neighbourhood parades which have been erroneously omitted from the supporting text

- Supporting environmental improvements to the low density industrial estates – Willow Lane is Merton’s largest industrial area but offers a poor quality environment and public realm and turns its back on the Wandle
- Providing explicit support for residential-led redevelopment of the Benedict Wharf site and its de-designation as a Strategic Industrial Land
- Committing to withdraw permitted development rights for office to residential conversions through the use of Article 4 Directions in sensitive locations, such as Conservation Areas

Environment

13. We welcome the strong commitment to Merton’s green spaces and the environment. The Local Plan can be strengthened by:

- Redesignating all existing Open Space as Local Green Space, as defined in the National Planning Policy Framework. It is demonstrably important to the local community
- Addressing the special approach to development within 400m of the Wandle Valley Regional Park boundary in policy rather than just the supporting text and including a map of the Regional Park boundary in the Key Diagram which confusingly associates the Regional Park with the course of the river
- Including the additional local open spaces and wildlife sites we have identified below and which we will input to the Open Spaces Study being prepared as part of the evidence base
- Addressing the omission of any policy which protects local ponds and identify Three Kings Pond, The Canons pond, Cranmer Green pond and the ponds on Mitcham Common as sites for protection
- Recognising the strategic importance of Mitcham Common in the Vision as the second largest open space in the Borough and including the potential for it to be part of a continuous area of green space extending to Beddington Park which provides multiple public benefits, including contact with nature, opportunities for healthy recreation and a reservoir of clean air and the scope for this to be delivered through an as yet unprepared management plan
- Introducing a policy for the protection of key paths (including public rights of way) to safeguard permeability and identify Cold Blows, Church Path, Love Lane (around Mitcham Parish Church), Tramway Path, Baron Walk, Fieldgate Lane and Ravensbury Path and also identify opportunities to create new non-vehicular access routes (including through the Wilson, through Benedict Wharf, through the Birches, between Church Road and London Road Playing Fields, between Three Kings Piece and Mitcham Common and from Riverside Drive to Watermeads)
- Strengthen Policy O8.4 both to require long term maintenance of planting and trees associated with new development through aftercare conditions and funds for their long term monitoring and to recognise the established arboricultural practice that new and replacement tree species will need to be resilient to climate change and so increasingly may not be native to the UK
- Strengthening Policy O8.5 to ensure that any development related to sport or recreation is well designed and respects the natural and historic environment, including the avoidance of light pollution from external illumination or inappropriate floodlights (as evidenced in The Canons)

Mitcham - policies

14. We welcome the strong emphasis on Mitcham and the ambition to improve the environment of the neighbourhood. Nevertheless the wording of Policy N3.2 is at such a level of generality that it does not provide the clarity of policy objectives required to manage and control future development in the area. This Policy does little to add to existing London Plan policy or national planning policy beyond referencing a selection of current Merton Council initiatives or namechecking some important locations. It is also confusingly separated into two separate policy statements. Policy N3.2 should provide a

much stronger and place-specific expression of the Local Plan's vision and strategic objectives as they apply to Mitcham. We make some proposals for achieving this below:

1. Identifying the specific examples of social and community infrastructure in Mitcham for the purposes of Policy In6.1 without restricting the Policy to these assets:

- Mitcham cricket pavilion and shed (including its operational land) – this has been formally recognised as Merton's first Asset of Community Value
- Mitcham cricket ground
- Burn Bullock public house
- White Hart public house
- The Windmill public house
- Former Mitcham fire station – future community arts centre and incubator offices
- Vestry Hall – community meeting/function rooms, voluntary and community organisations' offices & services
- Wandle Industrial Museum – community run registered museum
- Former Merton Tenants and Residents Federation building – community meeting/function room
- Mitcham Parish Centre – community meeting/function room and outdoor space
- Elmwood Centre (Age UK) – voluntary organisation offices and services, community meeting/function room
- Glebe Court Scouts Hall – community meeting and event space
- Mitcham Bowls Club – community sports facility
- Mitcham Community Orchard – community growing and outdoor space

2. Adding the following neighbourhood parades in Mitcham for the purposes of Policy Tc7.6 and Policy D5.2 for public realm improvements

- Bramcote Parade – provides an important community facility on the ground floor of buildings added to the Local List in 2017
- London Road – five short parades which combine to provide a significant community facility. The parades along the south east side of London Road provide particular opportunities for public realm improvements with a wide pavement, bus stop, dilapidated building and opportunities for planting
- Church Road – a single short parade

3. Identifying protection of the following local employment sites in Mitcham as being "scattered employment sites" for the purposes of Policy Ec7.1 and Ec7.4:

- 1-4 Lower Green West – currently used by London Box Sash Windows this site has a complex of workshops and a long manufacturing heritage that should be continued
- Units on 339 London Road & 12 Cricket Green - this area has a long tradition of car repairs, servicing and engineering along with office/training use (former Kiara College) that should be protected.

4. Identifying the following opportunities for improvements in the public realm and permeability through new development and use of the Community Infrastructure Levy:

- Cricket Green road (outside Mitcham cricket pavilion) – Mitcham cricket pavilion has the rare distinction of being on the "wrong" side of the road and is separated from the cricket ground by Cricket Green road. This is a heavily trafficked road with high levels of congestion. We support a traffic management measure outside the cricket pavilion which draws drivers' attention to the significance of this stretch of road, alerts them to the crossing point and actively slows traffic. A table top to calm traffic combined with a distinctive road surface was supported in the recent Townscape Heritage Initiative bid for Lottery funding. [*Public realm improvement; Traffic calming*]

- Cricket Green road (along east edge of Cricket Green) – This stretch of road makes a critical contribution to the character of Cricket Green Conservation Area and provides the setting for its most important and distinctive townscape. It is unable to cope with existing parking and access pressures. The introduction of controlled parking zones nearby, conversion of Brook House, increased use of Date Valley School and the potential future development of the Birches are set to exacerbate the issues. The Local Plan should support measures to enhance this stretch of road so it is a shared space where pedestrians have priority and parking is reduced. Only local access should be permitted. Pedestrian links which cross the road should be encouraged at Cold Blows and the entrance to The Canons. *[Public realm improvement; Local access; Restricted parking; Pedestrian priority]*
- King George VI Avenue – Cranmer Green is disfigured by intrusive parking, railings and sign clutter along the length of King George VI Avenue. No car access or parking should be permitted and this will allow the railings to be removed, as recommended in the Cricket Green Conservation Area Appraisal and Management Plan. It should remain accessible to cyclists. *[Public realm improvement, No parking]*
- London Road (between Cricket Green and Lower Green West) – The important relationship between Lower Green West and Cricket Green (also known as Lower Green) is damaged by the heavily trafficked London Road. Lower Green West includes an important collection of civic and community buildings and structures (including Mitcham war memorial which was nationally listed in 2017 following our nomination) and yet is increasingly taking on the character of a roundabout. We are keen to explore alternative traffic flow options around Lower Green West and seek support in the Local Plan for traffic management interventions and public realm improvements along the stretch between Cricket Green and Lower Green West. *[Traffic management, Public realm improvement]*
- Cricket Green tarmac path – The south eastern part of the registered town green is disfigured by a tarmac path which runs to the crossing point outside Mitcham police station. This path also sterilises a large part of the green for informal sporting and recreation use. The path should be removed. An alternative route using a registered public right of way alongside the cricket ground is available which should link to a relocated road crossing point. This would be an ideal location for a zebra crossing. This crossing point is closer to St Peter and St Paul primary school than the current one. *[Public realm improvement, Traffic calming]*
- Three Kings Pond to Mitcham Town Centre – The setting of Three Kings Pond has the potential to be a highlight for those living and working in Mitcham and as a route between Mitcham Town Centre and Mitcham Common. The public realm improvements undertaken for Rediscover Mitcham need to be extended along Upper Green East to Three Kings Pond. No parking should be permitted in the vicinity of Three Kings Pond or on land off the public highway on the south west of Upper Green East in Mitcham Town Centre. This area should also provide a stronger sense of arrival at Mitcham Town Centre. *[Public realm improvement, Traffic calming, No parking]*

5. Providing additional environmental designations for the purposes of Strategic Policy O8.1 and O8.2:

- Extension of Open Space designation to the green space between Cricket Green road and Date Valley School/Brook House
- Designation of Bellamy's Copse in The Canons as a Site of Importance for Nature Conservation
- Extend Metropolitan Open Land to include Mitcham Bowling Club and the whole of Bellamy's Copse adjacent to Canons Leisure Centre
- Extend Open Space to include all the green space within Glebe Court and all new green space created through the Rediscover Mitcham investment

- Extend Open Space to include the area currently used as allotments behind Mary Tate's Almshouses

15. Policy N3.2 should also be strengthened by:

- Identifying the frontage to the green space bounded by Cricket Green and London Road as an area of special townscape and heritage significance where any new development must be of exceptional design and be capable of being listed within 30 years – this is hinted at in the supporting text which recognises that development in the area *"should be laid out to improve legibility and permeability within the area and sensitively designed to complement the heritage assets"*. It is notable and inexplicable that equivalent policy for Wimbledon is worded much more strongly – *"Developers who look to build in Wimbledon must demonstrate a commitment to quality and design"* (paragraph 3.6.11)
- Clarifying the extent of Mitcham town centre which otherwise fatally undermines Policy N3.2 as it is unclear which limbs of the policy apply to which locations
- Providing evidence that the Rediscover Mitcham investment has *"helped drive extra footfall to businesses around Fair Green"* as this is highly contested and we are unaware of any studies being published
- Extending Policy Tc7.6a iii) preventing amalgamation of existing ground floor shop frontages in Wimbledon Village to Mitcham town centre in recognition of the fact that *"the high number of independent retailers and low vacancy rates is one of Mitcham's strengths"*
- Recognising key views in Conservation Appraisal and Management Plans for Cricket Green and Wandle Valley and the Wandle Vistas in Mitcham
- Making explicit reference to The Canons Conservation Management Plan which was adopted as Supplementary Planning Guidance in 2017 and requiring any development to be in accordance with its provisions

16. The supporting text for Cricket Green contains a number of errors which should be addressed:

- Mitcham cricket ground is the longest continuously played cricket ground in the world, not the country, where the game has been played every year since at least 1685
- The Canons project is funded by both Big Lottery Fund and Heritage Lottery Fund

Mitcham - sites

17. We made detailed representations in response to Merton Council's call for sites. We welcome much of the response to our representations and many of the sites identified in and around Cricket Green. We propose further refinements below and also identify an omission:

Mi1 Benedict Wharf – We welcome the broad approach, including redesignation of Strategic Industrial Land for primarily residential use. The allocation should be strengthened by:

- Committing to preparing a design brief for the site, co-designed with the local community and adopted as a supplementary planning document
- Extending the boundary to include the whole of the mini roundabout by Mitcham Parish Church – this is a key gateway to the Conservation Area and an opportunity for a major public realm improvement
- Extending the boundary to include the La Sporta hall which is currently a focus for development opportunity and has potential as an enhanced community asset
- Extending the boundary to embrace the opportunities relating to London Road Playing Fields
- Establishing an expectation that development of the site will meet the Local Plan's requirements for development to be *"street-based with good active frontages"*

and of a height commensurate with ensuring no visual intrusion into the surrounding area

- Addressing the interaction with proposals for the Sutton Link which includes an option running through the Cappagh site (Lambeth car pound)
- Recognising the adjacency of Wandle Valley Conservation Area as well as Cricket Green Conservation Area
- Addressing the opportunities for linkages and increased permeability across London Road Playing Fields to London Road, including through Fenning and Baron Courts fronting London Road
- Addressing the opportunity for re-instating Ravensbury Path between Church Road and Ravensbury Park
- Supporting mixed housing delivery mechanisms, including the Local Plan's aspirations for community land trusts and self-build
- Recognising route of Surrey Iron Railway (first public railway in the world)
- Requiring a significant overall increase in area of public open space across the wider area
- Requiring investment in community infrastructure (e.g. repurposing La Sporta Hall & investment in Mitcham Parish Centre)
- Correcting the description of the location of Barons Walk which lies to the east not the west of the site

Mi2 Birches Close – We do not support this site being allocated exclusively for residential use. The existing health facilities would be more appropriately replaced by a mixed use development including office and community functions. This site allocation can be strengthened by:

- Requiring any development to “preserve and enhance” the Conservation Area not just “respect” it which appears to weaken the statutory responsibility
- Supporting access through the adjoining site (currently the Dementia Centre) and Whitford Gardens due to capacity limits on Cricket Green road
- Requiring development to retain the same equivalent area of open space and to retain significant trees and provide equivalent replacements for trees lost

Mi3 Burn Bullock & Mitcham cricket pavilion – We support the proposed site allocation with restoration of the Burn Bullock and community ownership and in perpetuity use of the cricket pavilion and shed, supported by enabling development. Our valuations of development and restoration options for the site undertaken with the support of the Government's Community Ownership and Management of Assets program supports the viability of this approach. We are in discussion with the owners and architects about the site and may update our approach in the light of further information being made available. Our priority is to secure community ownership and use of the cricket pavilion and its operational land, linked to use of Mitcham cricket ground, alongside removal of the Burn Bullock from the Heritage at Risk register. The owner has legal obligations to maintain the listed Burn Bullock and we support its restoration and reopening as a public house or similar use. The site allocation should be strengthened by establishing a requirement for transfer of the ownership of the cricket pavilion and its operational land at a reasonable cost to be determined by an independent valuer if necessary. The detail of the text should be corrected to recognise cricket has been played every season on Mitcham cricket ground since at least 1685 and not 1707.

Mi5 Land at The Canons – We do not support the allocation of the former nursery at The Canons for residential development. This is an opportunistic approach driven more by the fact of the land being owned by Merton Council than respect for its location in the historic grounds of The Canons and adjacent to Park Place. We believe there are other better uses for this land which would support the wider ambitions for The Canons and Park Place envisioned in the Lottery-supported £5m+ investment in the site. The details of the site allocation can be strengthened by:

- Recognising the wall running by the site as being Grade II* listed (confirmed as part of the Canons Lottery project)

- Referencing the need to respect The Canons Conservation Management Plan which is an adopted supplementary planning document
- Recognising the proximity to the Grade II listed Park Place to the east of the site and that it lies on the historic boundary between the two mansion houses
- Recognising and committing to protecting the exceptional Pagoda tree in the west of the site
- Establishing an expectation equivalent to that for The Birches for “*exemplary urban design complimenting [sic] the character of the area*” supported by a collaborative design approach with the local community

Mi6 – 326-328 London Road – We do not support the allocation of this site solely for residential use if the current community functions are located elsewhere. The centralisation of community functions such as the existing Citizens Advice in a location such as the Wilson should result in a net gain in community infrastructure. The site allocation should be strengthened by recognising the value of 326 London Road (Kellaway House) as a non-designated heritage asset (which we have proposed for local listing). This is a striking late 19th Century double fronted detached house which is the last survivor of what used to be a row of detached and semi-detached houses along London Road between the Upper and Lower Greens. These were subsequently replaced by Glebe Court. The building has important detailing with projecting brick quoins and dressings of contrasting colour. It has a white fireclay brick front elevation. The Mitcham Cricket Green Conservation Area Appraisal and Management Plan identifies Kellaway House as making a positive contribution to the Conservation Area and identifies the front elevation as being of gault brick. Its retention should be a requirement of any site allocation. The allocation should also identify the opportunity to enhance the open land fronting London Road currently used as parking while retaining the set-back that continues along London Road for the extent of Glebe Court.

Mi7 370-374 London Road (car wash site) – We support the proposed site allocation which is in line with our original proposals. We do not support the proposal that the height should be guided by the unimplemented planning permission at 360-364 London Road as this is excessive. Broadway Gardens provides a natural break in the streetscape with the site relating to the local shopping parade to the south west. This would deliver the identified opportunity for “*strengthening and extending local retail parade*” which would not be achieved by a discordant higher development.

Mi8 Majestic Way and Mi12 Sibthorpe Road car park – These two large sites in the heart of Mitcham’s centre are pivotal to its future success. The site allocations are limited in their approach and unduly focused on retail and residential uses rather than the wider cultural needs of Mitcham for places to attract and encourage people to stay. This would include options such as a cinema, relocated library and much needed social and community infrastructure. They both provide opportunities to create new central spaces which add to the historic core around Fair Green. They can also increase permeability within and across the centre and create a much more substantial centre with two new areas set back from existing routes and each contributing their own distinct character.

Mi9 former Mitcham fire station – We do not support the proposed site allocation which is too open ended for such an important building in a sensitive location at the heart of Cricket Green. Merton Council controls the right of access to the highway and so can exercise a significant influence over the development and use of the site. The details of the site allocation can be strengthened by:

- Extending the boundary to include the apron down to the road given its importance to the streetscape and former function
- Providing a clear expectation as to the required mix of uses and that this needs to include D1 and/or D2
- Recognising the opportunity to strengthen the physical and functional relationship with the Vestry Hall

Mi17 White Hart – We support the proposed site allocation, linking residential development to the restoration and viable re-use of the White Hart as a public house or similar function. Given the experience with the current planning application it would be helpful if the wording were strengthened to:

- Require any development to not be visible from Cricket Green or Lower Green West given the impact on the listed buildings and the Conservation Area
- Ensure access for servicing, deliveries and residential use is only permitted from Broadway Gardens
- Retain the characteristic yard entrance from London Road
- Require investment in the public realm and function of the Jubilee Corner junction

Mi18 Wilson Hospital – We support the proposed site allocation, including the requirement that residential development should only be permitted if necessary to enable wider delivery of the site. The details of the site allocation can be strengthened by:

- Committing to preparation of a design brief for the site, building on the [community planning and design brief](#) prepared by Mitcham Cricket Green Community & Heritage and adopted as a supplementary planning document
- Specifying a need to retain the full classical frontage and symmetry of the existing building facing Cranmer Green which has historic significance that extends beyond the entrance portico
- Retaining a horizontal built form on the key frontage facing Cranmer Green
- Retaining and repurposing the historic lodge opposite Cranmer Green which provides an important link to the original function of the site
- Incorporating a new drop-off to Cranmer School as part of any development
- Requiring any residential development along Caesar's Walk to respect its existing character and provide an extension of the current two storey residential form
- Confirming that development of the linked site at the Birches will be considered in any assessment of viability and deliverability
- Linking funding secured through any residential development exclusively to provision of community wellbeing services
- Delivering no increase in the footprint of buildings over the whole site and no development in the green corridor running through the north west and south east of the site
- Avoiding loss of green space and tree cover and retaining the significant group of trees to the east of the hospital and commemorative trees
- Retaining open land & views into the site along Cranmer Rd and Caesar's Walk
- Ensuring full public access to the grounds and making positive use of the open space for public health, wellbeing, informal play and wildlife

Mi19 – Worsfold House – We support the proposed site allocation which should also include an element of community use. The details of the site allocation can be strengthened by requiring any development to provide increased public access, including through routes between Church Road & London Road Playing Fields, and public realm investment, including to Church Path and the site boundary. These investments should integrate with the proposals for Benedict Wharf.

18. There is a need for an additional site allocation for the former Sparrowhawk Yard at 159 Commonside East for residential (C3) or office (B1) or mixed use. This should recognise it is adjacent to Mitcham Cricket Green Conservation Area, in the Wandle Valley buffer and adjacent to Open Space and Metropolitan Open Land. Any development should:

- Respect the residential context and height and style of neighbouring residential buildings
- Avoid visual impact on Three Kings Piece to south of Commonside East
- Remove illegal parking on registered town green along Commonside East and restore it as green space
- Use recessed balconies where balconies are required

- Make a positive contribution to the corner site

Implementation

19. There is a need for an additional section in the Local Plan on its delivery and implementation. This should include:

- Establishing an expectation for pre-application community consultation on development proposals in accordance with the guidance in National Planning Policy Framework paragraph 128 that "*Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*"
- Clear requirements for the quality of information provided with planning applications to establish an expectation that material with clear errors and omissions will result in a planning application not being registered until rectified
- A requirement that all pre-application advice, viability assessments and Design Review Panel reports will be published online alongside planning application documents
- A clear commitment to enforcement of the planning system
- Refreshing the online system for development management to replace Planning Explorer with a user-centric system, including provision for accessing planning information via online maps
- Priorities for the use of Community Infrastructure Levy
- Support for any neighbourhood plans that come forward

Community Infrastructure Levy

20. We have identified the following Community Infrastructure Projects as a priority for funding through the Community Infrastructure Levy in and around Cricket Green:

- Cricket Green shopping parades – public realm and shopfront improvements for:
 - Bramcote Parade
 - London Road
 - Church Road
- Six public realm and traffic improvements:
 - Cricket Green road - outside Mitcham cricket pavilion
 - Cricket Green road – along east edge of Cricket Green
 - King George VI Avenue
 - London Road – between Cricket Green and Lower Green West
 - Cricket Green tarmac path removal
 - Three Kings Pond to Mitcham Town Centre
- Secure a sustainable future for Mitcham Cricket Club and community control of Mitcham Cricket Pavilion, its shed and its operational land
- Secure and maintain the Vestry Hall annex as a long term location for Wandle Industrial Museum
- Improve wayfinding of public rights of way and connections between the Wandle Trail and The Canons
- Rationalise the diversity of different boundary treatments to bring greater consistency and respect for the character of the Conservation Area, with completion of the cricket ground railings, removal of the chalk stick bollards and metal posts outside Date Valley School, removal of the single metal post at the end of the tarmac path linking Cold Blows to the Vestry Hall, and removal of the railings along King George VI Avenue as a priority
- Prepare and implement management plans for each of the Town Greens and the three Sites of Importance for Nature Conservation (Cranmer Green, Mitcham Parish Churchyard and Commonsides Rough) following community engagement
- Maintain the tradition of commemorating important historic events through planting initiatives

- Undertake a significant programme of succession planting of trees throughout the area
- Maintain and improve the area's existing public noticeboards, plaques and interpretation panels
- Celebrate and provide interpretation for Mitcham tram stop as the oldest public railway station in the world, for the route of the Surrey Iron Railway and for the significance of Mitcham cricket ground for being the location where the game has been played every year longer than anywhere else in the world

Evidence base

21. Effective implementation and delivery of the Local Plan will require the support of an up to date evidence base and its absence could be a reason for the Plan not being found "sound" at Examination. This will require the following documents to be variously prepared, adopted or reviewed by Merton Council (except as indicated):

- Mitcham Cricket Green Conservation Area Appraisal and Management Plan – adopted and needing review by 2020
- Wandle Valley Conservation Area sub Area 6 Character Assessment – needing to be adopted before the Local Plan and subsequently produced as a Conservation Area Appraisal and Management Plan
- Character area studies for Cricket Green, Mitcham and Wandle – drafted and needing to be adopted before the Local Plan
- Cricket Green Design Code – needs preparing in 2019
- Benedict Wharf development brief – needs preparing in 2019
- Wilson Hospital development brief – needs preparing in 2019
- Management plan for Mitcham Common – needs preparing by Mitcham Common Conservators in 2019
- Management plan for each of the registered town greens – needs preparing by 2020