



MITCHAM SOCIETY

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Mitcham Society Submission to Merton Council Local Plan 2020

Stage 2 Consultation - January 2019

Mitcham Society has a vision for Mitcham town centre as a 21st Century Village, with its focus on what remains of Fair Green, and extending to Figges Marsh, Three Kings Piece and onwards to the Canons, Cricket Green and its various greens, and Mitcham Common.

Mitcham Village is under increasing pressure for housing development. In general the Local Plan appears to be setting Mitcham up for significant intensification, to a degree which is incompatible with the Local Plan's welcome aspiration for development to respect and enhance Mitcham Village's existing character.

The comments we make in this document are all focused on our wish to see the Local Plan better protect, preserve and enhance Mitcham Village. We are not against change, and recognise the need for development. Our focus is that development needs to be sensitively managed and within a context that will ensure Mitcham Village does not become a bland 'anytown'.

In this context, Mitcham Society believes that:

- No new development above four stories in high is appropriate for the area described above. Anything taller encroaches on the village feel.
- It is detrimental to the character of Mitcham Village to add floors onto existing buildings. We have seen planning applications for this in recent times, including along London Road, and it is likely to be a growing trend. This trend should be halted in the Local Plan because raising height in this way is absolutely contrary to the continued existence of Mitcham Town Centre as a 21st Century Village.
- Retail space should be of a size appropriate to the village feel of Mitcham, and policies should focus on encouraging independent shops which can do their bit to build the vibrant economy based on leisure, socialising and retail that the Local Plan aspires to foster in this area.

Recognising Mitcham as a 21st Century Village

Overarching all our comments are the following principles, all based on the desire to ensure Mitcham is recognised as a 21st Century Village. All new development should:

- Recognise, value and protect the village character of Mitcham
- Wherever possible seek to enhance and strengthen the village character of Mitcham
- Actively promote and support Mitcham as a 21st Century Village
- Actively discourage development, built or otherwise, which –
 - o Disrupts or damages the existing elements which characterise Mitcham Village
 - o Detracts from the continuation of a village feel in Mitcham
 - o Over urbanises
 - o Removes Green Spaces
 - o Prioritises the 'generic' over the local, special and unique

The Local Plan is neither clear nor emphatic enough about the characteristics that make Mitcham Village special.

It should contain specific reference to those features which contribute to Mitcham Village, and which should be at least preserved and at best enhanced through every single planning application and development opportunity that comes to Merton Council, whether through third parties or as a result of its own endeavours. This includes all currently planned and future development by the Council's own development company.

For the absence of doubt, these are among the characteristics Mitcham Society believes are special to Mitcham Village:

- A network of greens including Fair Green, Three Kings Piece, Figges Marsh, Lower Green, Cricket Green, and the vast open space of Mitcham Common
- Street names which clearly reference the open spaces including Upper Green West, and Upper Green East (surrounding Fair Green itself), Commonside East and Commonside West (flanking Three Kings Piece and leading into Mitcham Common, and Lower Green West, Lower Green East and Cricket Green flanking Lower Green and Cricket Green
- Historic buildings, including two of Merton's three Grade I listed structures, a number of Grade II* and Grade II listed buildings as well as locally listed buildings and other structures
- Three Kings Pond with its locally listed cart dip
- A generally low-rise character to buildings, with very few buildings more than four storeys high, a small number of weatherboarded buildings, and many which quite clearly visibly date from the 1800s, 1900s and pre mid-2000s
- A shopping environment which is notable for local rather than chain shops
- The close proximity of residential and retail areas making Mitcham walkable
- A public realm that has an open, accessible aspect, with a clear heart at Fair Green

In achieving the aim of ensuring that Mitcham Village retains its existing special and unique character, and continues to enhance and develop that character, the Local Plan should refer to Mitcham Village or Mitcham Village Centre rather than Mitcham town centre.

We note that there is no public toilet facility in Mitcham Village Centre. A public toilet facility was promised as part of the Rediscover Mitcham programme, yet that programme was declared finished in the Summer of 2018, and no public toilet facility was provided. We would expect the Local Plan 2020 to recognise the need for a public toilet in Mitcham Village Centre, and to explain how this commitment from the Rediscover Mitcham project will finally be honoured.

Response to Policy N3.2 Mitcham

The policy is divided into two – one covering ‘Mitcham Town Centre’, and one covering ‘Surrounding area of Mitcham Town Centre’. Neither area is defined, such as by showing them on a map, so their boundaries are unknown.

The map that opens this section of the Local Plan shows an area which we assume defines ‘Mitcham Neighbourhood’ as this is the section heading on the same page as the map.

There are no policies for ‘Mitcham Neighbourhood’. It is unclear whether the part of Policy N3.2 relating to the (undefined) ‘Surrounding area of Mitcham Town Centre’ is intended to apply to the entire area of the map apart from the (undefined) Mitcham Town Centre.

It is very difficult to comment on policies when the area they cover is not defined.

Please provide maps that make clear the areas covered by ‘Mitcham Town Centre’ and ‘Surrounding area of Mitcham Town Centre’, and allow a new consultation round once these boundaries are clear so that we may refine our comments.

The policy makes little mention of the cultural aspects of life in Mitcham. The entirety of the Mitcham section of the Local Plan makes no mention of ‘culture’ and just one mention of ‘arts’ (in relation to Mitcham Fire Station). If Mitcham Village (and indeed its surrounding area) is to be a vibrant hub where people want to linger, it needs to have a strong cultural life. Facilities for this are sorely absent at present, and we would expect the plan to show a greater aspiration in this direction.

Specifically:

- The sections of the policy for ‘Mitcham Town Centre’ and for ‘Surrounding area of Mitcham Town Centre’ fail to make any mention of cultural life. Both sections should be amended to include this, and evidence Merton Council’s commitment to supporting culture and the arts in Mitcham.
- The Justification should make very specific points about the benefits a strong cultural life brings to communities, and explain why it is important that more attention is paid to developing this aspect of life in Mitcham during the life of the Local Plan

We are concerned that the policy makes no specific reference to the greens, trees and other planting of Mitcham Village Centre, or to its ponds or other aspects which make Mitcham Village and its surroundings semi-rural in nature.

We are aware of the importance of open spaces, water, trees and grass to health and wellbeing, and we expect both the policy and justification to acknowledge these, state aspirations around them and make commitments to maintaining and enhancing these and any other semi-rural qualities which play their part in making Mitcham Village and its surroundings special.

We expect the policy to recognise and champion these aspects of Mitcham Village, and to:

- Make a clear statement about the value of the natural environment in both Mitcham Village Centre and the Surrounding Area
- Specifically name the key ponds – Three Kings Pond, Cranmer Green Pond, The Canons Pond, and specifically name the all of the greens, and commit to ensuring they are protected and enhanced
- Aspire to adding new open spaces, greens, trees and other natural environment as part of the continued development of the semi-rural nature of Mitcham Village and its surroundings

Policy N.32 Mitcham Town Centre point b emphasises “creating healthier streets”.

Implementing this policy must take into account the detrimental effect on health caused by poor air quality. Our measurements of air quality in 2016 and 2018 show that air quality in Mitcham Village is detrimental to public health, and breaches legal limits.

	Date test put in place	Hours of test	Average $\mu\text{g}/\text{m}^3$
Outside Mitcham Islamic Centre on bus street	15/05/2018	840	65.3
In a tree outside Tag Elezz cafe	15/05/2018	840	42.4
Barnard Marcus , Commonsides West	15/05/2018	840	44.8
Lidl, Western Road	15/05/2018	840	55.0
Outside former Pound Store London Road (opposite Langdale Avenue)	15/05/2018	840	56.2
Lamp post at Junction of Holborn Way and Upper Green West	15/05/2018	840	34.3
At Three Kings Pond, Commonsides West	15/05/2018	840	50.1

Along what is now the bus street, air quality has fallen significantly since before the bus street was in place –our 2016 measurements below predate the bus street.

	2016 Average $\mu\text{g}/\text{m}^3$	2018 Average $\mu\text{g}/\text{m}^3$
In a tree outside Tag Elezz cafe	32.51	42.4
Lamp post Holborn Way	31.23	
Outside Mitcham Islamic Centre on bus street		65.3

For the full results see <https://www.mitchamsociety.org.uk/news/air-quality-monitoring-2018/>

For public transport not to endanger public health, the Local Plan needs to champion cleaner public transport.

Policy N.32 point b “Creating healthier streets” needs to be strengthened.

Mitcham Society would like to air quality covered in the justification, and in particular a recognition of the need to improve air quality by removing all on street parking for private vehicles from Mitcham Village Centre and ensuring zero emission buses on all routes that go through Mitcham. (This would also improve walkability through the Village Centre).

Policy N.32 Mitcham Town Centre point c states “Make Mitcham Town Centre easier to walk around and easier to get to by walking, cycling and public transport.”

Referring to our air quality measurements above, and to the wider community air quality map at <https://www.google.com/maps/d/viewer?mid=1tO-MxIPduvN9jidPKvXKh4v38lg&ll=51.40725069546451%2C-0.19913789999998244&z=13> which includes both community and Merton Council measurements, it is clear that air quality generally in Mitcham breaches legal limits more than it meets them. This must change.

Coupled with a desire in policy N.32 to improve non-car based access to Mitcham Village we would like to see the Local Plan show a desire to regularise parking so that it is out of Mitcham Village centre and away from the greens and open spaces, encouraging walking to and from the centre.

St Mark’s multi story car park is woefully underused. We recognise this is part of a development site, but at present it is available for public use and until its possible removal due to development its use should be encouraged.

The issues of parking and air quality should be addressed in Policy N.32.



Response to Mitcham Sites

Site Mi1 Benedict Wharf

Our key concerns for this site are:

- Residential development should be sensitive to the surrounding streetscape, low rise (not more than 6 storeys at any one point) and designed to the highest standards.
- The site is designed so that it opens up access to Morden Hall Park and London Road Playing Fields, making a new set of routes through the Mitcham area and into Morden, and makes access to the tram and tube viable.

Issues: add to this section that the use of the site should not be over intensive. It is possible to combine density with good design, and this is a large enough site to allow this goal to be met.

Site Mi2 Birches Close

We support a designation which includes Residential, Office (B1a) and Community (D1).

We do not support a designation solely for housing.

The gradual erosion of community facilities in Mitcham is a great loss to community organisations (and detrimental to arts and culture development). Encouraging a part of this site to be used for a new community hall would be a step towards redressing the balance.

Site Mi3 Burn Bullock and Mitcham Cricket Pavilion

Mitcham Society would like to see the Local Plan provide assurance that the Burn Bullock retains a community use function as a restaurant or pub, or other similar facility. While the designation for public house/restaurant is welcome, we would expect to see a strong statement in support of this designation being realised through development.

Site Mi4 Elm Nursery Car Park

As a significantly sized corner plot the site allocation should add an issue about potential over development/intensification. Sir Arthur Bliss Court opposite is four storeys tall, surrounding development is two and three storeys tall. Anything taller than four storeys should not be permissible.

Site Mi5 Land at Canons



We are unconvinced that this site should be designated as residential. This is notwithstanding the progress Merton Council's development company is making towards residential development for this site.

This is a vital site, right in the heart of the Canons Lottery funded project, and we feel there needs to be exploration of its potential to contribute to the work being done on the Lottery project, such as by providing community / arts / cultural facilities. We are not convinced that the location is appropriate for housing.

Should the designation of residential remain unchanged, we are concerned that the design of any residential development be of the very highest quality and would expect to see the greatest possible effort put into design.

Site Mi6 326 and 328 London Road

We do not support the designation of this space as solely Residential (C3).

We support the designation of this space for office (B1a) and community meeting space (D1).

Any development, of whatever use, should not go beyond the current footprint of the buildings. The flanking building - Glebe Court – is set back with landscaping in front. Any building forward of the current footprint would destroy the visual appearance of this part of London Road and have a negative effect on the residential amenity of the adjacent properties in Glebe Court and on Sibford Court.

Mitcham Society would prefer to see conversion rather than demolition of the current CAB building. This is a historic Mitcham Building, with its own special character.

Site Mi7 370 - 374 London Road

This is a significant corner plot almost opposite the Grade II listed Burn Bullock and acting as a gateway onto Cricket Green. It is alongside a parade of shops and opposite another parade with flats above.

The key opportunity here is for a high quality development which extends the parade of shops with housing above, and plays its part in forming a gateway onto the Cricket Green, right at the heart of Mitcham Cricket Green Conservation Area.

The Local Plan says "Height to be guided by the context of buildings over shops running along London Road to the south west and the proposed development at 360-364 London Road".

In our view the proposed development at 360-364 London Road should never have been given planning permission. It is too tall, too dense and poorly designed. It is not an appropriate guide for

any building on site Mi7. The context of the shopping parades next to the site offer a much more appropriate guideline.

The information for this site should be amended to remove the reference to the proposed development at 360-364 as a guide.

Development must, in any case, have regard to the amenity of the two storey homes in Broadway Gardens.

Site Mi8 Majestic Way 1-12

Opportunities: This is a site of significant size and includes the current multi-storey car park. It is in an extremely prominent location in Mitcham Village. Its redevelopment will set the scene for future development in Mitcham Village in terms of height and design – it is arguably the watershed development for the next 30 years.

The site has the potential to be the fulcrum of the 21st Century Mitcham Village, or its death knell.

Because of this it must be handled extremely sensitively. We expect the Local Plan to be much clearer about setting exceptionally high expectations for this site, including relating to design standards and to community involvement in pre-application consultations.

We also expect to see some reference in the Opportunities section to using this site to provide some of the much needed cultural and arts facilities for Mitcham Village Centre that we reference earlier in these comments.

Site Mi9 Former Mitcham Fire Station

Mitcham Society has supported the Mitcham Cricket Green Community & Heritage campaign to retain Mitcham Fire Station as a local arts venue since plans to relocation to a new fire station became known.

We do not think this site is appropriate for housing or entirely for office use, and maintain our desire to see it used as a community arts venue, with possible office use or arts seed office space above.

We would therefore like to see a strengthening of the Opportunities section to reflect a predisposition against housing or office use and towards community / arts use.

Site Mi10 Mitcham Library

Merton Council has already removed the function room to the side of the library and allowed this to be converted to a nursery. This is a significant loss of community space, for which no replacement



has been provided within Mitcham. We do not wish to see any more of the library space or the community space it provides lost to the community.

Strengthen the Opportunities section to be clearer that if the library remains in its existing location there will be no further loss of community accessible space and if the library is moved closer to Mitcham Village Centre there will be no net loss of floorspace, no net loss of bookstock and no net loss of publicly available community space in the new location.

If the current site is vacated and made available for the uses proposed, it should be clear that the building should be retained, not demolished.

We do not support building further storeys on top of the existing building.

Site Mi11 Raleigh Gardens Car Park

This is a prime site in Mitcham Village Centre and development should not extend above four storeys.

As a council-led development it should establish the highest of design standards and be co-designed with the community, acting as an exemplar of what is expected by other developers in Mitcham.

Site Mi12 Sibthorpe Road Car Park

This is a large site on what is effectively a giant roundabout, with some shops fronting onto it already. It presents an opportunity to extend the shopping area of Mitcham Village Centre into this area, with routes through from Fair Green and London Road.

With careful attention to detail and good public realm design this could open up an entirely new area of Mitcham Village Centre, with its own character, and a strong retail /community offer at ground floor level facing inwards towards a central plaza – extending the green space of Fair Green and adding new Town Green. It could be an excellent 21st Century addition to Mitcham Village – as important in its potential as site Mi8.

We are concerned about the possibility for overly dense and tall residential development on this site, and for the loss of the opportunity to create a new and exciting part of Mitcham Village Centre. We would expect no new build to be greater than four storeys and of the highest design standards.

Site Mi18 Wilson Hospital

Preparatory work on the Wilson Hospital site has been protracted with many delays.



The potential for enabling residential development has been an on/off idea for the site. At present it seems this is back on the table, and the proposed designation is “Healthcare with community and enabling residential development.”

Mitcham Society is concerned that:

- This vitally important and locally listed site is treated with respect, and its key position in the local landscape is not diminished by any development
- The front of the building is not in any way damaged by development. The current building is locally listed, and it is vital that it is retained through any development. We have been present at discussion where just preserving the façade around the entrance has been presented as a viable option, with the rest of the façade being demolished. This is not acceptable. We expect the local plan to be clear about the need to retain the full front façade.
- The Lodge, an important building that is physically set apart from the hospital building, should be specifically mentioned and discussed in the text to ensure it is protected and not in danger of demolition.
- Enabling residential development is kept to an appropriate scale and density. NHS Property Services will be disposing of The Birches site in due course, and the Local Plan notes that the applicant has suggested a designation of Residential for that site. Our own preference for a designation which includes Residential, Office (B1a) and Community (D1), should not preclude this site providing enabling development for The Wilson site, and we would expect residential on the Wilson site to be minimal. Should the enabling residential development be along Caesars Walk we would expect it to be in keeping with the scale, form and massing of the existing housing on this street, and to have a visual design which fits the streetscape.

Site Mi19 Worsfold House

Mitcham Society supports a mixed designation for this site that includes residential, office, community and public open space.

Response to Vision and Strategic Objectives

Point 1.23 states “The redevelopment of key sites within Mitcham town centre will have provided new, well designed commercial floorspace occupied by business supporting leisure and social activities for the surrounding neighbourhood. New homes above shops in the town centre will boost local businesses, helping them to provide more jobs and better services.”



Mitcham Society shares this vision for a thriving and vibrant Mitcham. Planning policies need to ensure that development is of an appropriate scale and form, and of the highest possible standard of design.

Keeping to four stories or fewer, and respecting the greens, and open spaces of Mitcham Village, and its ponds (Three Kings Pond, Canons carp pond and Cranmer Green pond), will be vital to ensuring Mitcham Village is not overwhelmed by high rise and sacrifice its special character.

We would expect Policy N3.2 to be clear in its expression of this desire.

Vision and Strategic Objectives 1.33 states “Merton is still the envy of many other parts of London for its wealth of green and open spaces, and access to nature including Wimbledon, Mitcham and Canon Hill Commons, Morden Hall Park, Morden Park and Ravensbury Park.”

In order to maintain this envy in the way you envision, the policies for Mitcham should be enhanced to enshrine it. In addition to the comments made earlier in this response relating specifically to policy N3., the Local Plan should make the following commitments:

- All open spaces in Mitcham Village and in the Surrounding Area should be designated as Local Green Space (giving them the same protection as Green Belt)
- The promised registration of new open space created by Rediscover Mitcham as Town Green should be completed

Response to Section 7 - Economy

Policy Tc7.6 states “The council will support new development in Merton’s town centres and neighbourhood parades commensurate with their scale and function, providing it respects or improves the character and local economy of the area.” It goes on to state that it will support proposals “for development that provides a range of unit sizes in Wimbledon, Colliers Wood, Mitcham and Morden”.

Meanwhile Justification 7.6.13 states “To avoid adverse impacts on existing centres, town centre floorspace over 1,000 square meters will not be supported outside Wimbledon,. Colliers Wood, Mitcham and Morden”. This implies that developments over this size will be supported in Mitcham.

Developments over 1,000 square meters would be entirely detrimental to the village character of Mitcham.

This paragraph (7.6.13) and Policy Tc7.6 should be amended so that supported development is not of a size that would be detrimental to its village character.

There should be:



- A sub-point for in policy Tc7.6 Mitcham such as that which precludes amalgamation of existing ground floor frontages in Wimbledon Village
- Clarity on a maximum height for commercial development (offices, retail and any other)
- A maximum square footage for any single retail space – such that retail is kept within a footprint that is appropriate for the Mitcham Village setting

Justification 7.6.12 States “Mitcham has a unique cultural identity and character”. The Local Plan should seek to protect and enhance this, and amend policies to ensure that it is not considered as similar to Wimbledon and Colliers Wood, both already subject to significant intensification. The aim should always be to preserve and enhance the Village characteristics of Mitcham, rather than drive Mitcham Village towards more intensified, high rise, blandly designed development which will be to the detriment of its cultural identity and character.

General comment

In our response to the first consultation on the Local Plan Mitcham Society made a number of points which should be taken into consideration in the wider context both of the Mitcham policies and of broader future development of Mitcham Village and its surroundings. This is attached to this document and should be considered as part of this representation.

Mitcham Society submission to Merton Council Local Plan 2020

Mitcham: A 21st Century Village

Mitcham retains many of the features and characteristic of a village, and these give it a unique and special status within Merton. But it is under increasing development pressure. At the heart of Mitcham Society's submission to the Local Plan 2020 is a desire that it enshrines a response to all development pressures which will:

- Recognise, value and seek to retain the village character of Mitcham
- Wherever possible seek to enhance and develop the village character of Mitcham
- Actively promote and support Mitcham as a 21st Century Village
- Actively discourage developments, built and otherwise, which
 - o Disrupt or damage the existing elements which characterise Mitcham Village
 - o Detract from the continuation of a village feel in Mitcham
 - o Over urbanise
 - o Remove green spaces
 - o Prioritise the 'generic' over the special and unique

Following these principles can help Mitcham retain and develop its position as a 21st Century Village of which local people – and the whole borough of Merton – can be proud.

Mitcham Village: Key Characteristics

A number of characteristics contribute to give Mitcham a unique status within Merton as a 21st Century Village.

These characteristics include:

- A network of greens including Fair Green, Three Kings Piece, Figges Marsh, Lower Green and Cricket Green, and, the vast open space of Mitcham Common
- Street names which clearly reference the open spaces including Upper Green West, and Upper Green East (surrounding Fair Green itself), Commonside East and Commonside West (flanking Three Kings Piece and leading into Mitcham Common, and Lower Green West, Lower Green East and Cricket Green flanking Lower Green and Cricket Green
- Historic buildings, including two of Merton's three Grade I listed buildings, a number of Grade II* and Grade II listed buildings as well as locally listed buildings and other structures
- Three Kings Pond with its locally listed cart dip

- A generally low-rise character to buildings, with very few buildings more than four storeys high, a small number of weatherboarded buildings, and many which quite clearly visibly date from the 1800s, 1900s and pre mid-2000s
- A shopping environment which is notable for local rather than chain shops
- The close proximity of residential and retail areas making Mitcham walkable
- A public realm that has an open, accessible aspect, with a clear heart at Fair Green

This village character is in danger of being lost through insensitive development, just at the time when the village characteristics of walkability, mixed use and human-scale townscape are being recognised as an ideal approach for the future.

Retaining the Village Character

In order to maintain the character of Mitcham Village any development should be considered in the context of at least retaining and at best enhancing the characteristics mentioned above.

In addition, Merton Council should ensure that:

- New development should respect the character and scale of the existing townscape and be no taller than four stories high
- Additional stories on existing buildings should not increase the height of those buildings to more than six storeys
- New development is of the highest design quality, with detailing and use of high quality materials.
- New development should be required to enhance the public realm, including (but not exclusively) the provision and maintenance of green space, planting and trees - and provision for their maintenance - taking priority over hard landscaping
- All existing green space and planting – including that created through the Rediscover Mitcham investment – is protected from any future removal by designation as registered town green
- Retail developments should continue to have small floorplates and priority should be given to encouraging small, local businesses
- Mitcham Market should be developed so it can fulfil its role as an attractor to Mitcham
- Merton Council should be mindful of the balance of shops that will enhance Mitcham Village and use the powers it has to help develop and sustain that balance, for example ensuring there is no further growth in hot food takeaway shops

Ensuring a Positive Future

As well as ensuring that new development does not detract from the character of Mitcham Village, Merton Council should make every effort to enhance Mitcham Village through highway investment and use of the community infrastructure levy. This should include – but not be limited to, efforts to:

- Reduce road traffic
- Combat air pollution
- Encourage walking and cycling

Measures to enhance Mitcham Village should include:

- Introduction of 20mph zones throughout the Mitcham Village area, along with other measures such as the creation of home zones and pedestrian priority areas to reduce traffic and the air pollution it causes

- Removal of all parking bays in and around Mitcham Fair Green as these inhibit pedestrian and cycle flows, unnecessarily occupy a large area of public realm, and cause visual intrusion across what should be an open and pleasant area
- Encouragement of the woefully underused multistorey car park for vehicle parking
- Provision of wide, usable cycle lanes along London Road connecting Fair Green to Cricket Green, Mitcham tram stop and beyond, alongside removal of all permitted cycling on pavements, to promote true permeability for both cyclists and pedestrians
- Ensuring that traffic light phasing in Mitcham Village works in favour of pedestrian at all times, to encourage walking
- Securing from TFL the introduction of Ultra Low Emission buses for all buses on all routes that use the new 'bus street' that cuts through Mitcham Fair Green