



NEW MERTON LOCAL PLAN – Stage 3 - Public Examination Representations from Mitcham Cricket Green Community & Heritage

September 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, Borough Character Study, the Conservation Area Appraisal and Management Plan 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 (<https://mitchamcricketgreen.org.uk/cricket-green-charter/>). The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run local events including Mitcham Heritage Day and Community on the Green.

2. We made detailed representations in January 2021, January 2019 and January 2018 on Merton Council's call for sites at Stage 1 of the Local Plan review and the draft Plan for consultation at Stage 2 and Stage 2a. 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 progress on the Local Plan and its effectiveness in providing a distinct approach for Mitcham will inform our decision.

3. We acknowledge changes to the draft Plan which have been made in response to some of the issues we raised in earlier representations. Nevertheless, the Stage 3 draft for public examination fails to address many of issues that have been raised repeatedly during the consultation process. We also have concerns over the robustness of the policy drafting and the public consultation process and that the Plan period is less than the expected minimum 15 years. As a result we conclude that the Local Plan is **not sound** and object to the document as it stands. We believe the Plan needs significant amendment before it can adopted and that it should run to at least 2038 and be supported by a fuller evidence base and robust Sustainability Appraisal. We hope this can be achieved through public examination of the Plan. We are also aware that the National Planning Policy Framework was revised on 20 July 2021. This was after the Stage 3 Local Plan was agreed by Merton Council's Full Council on 7 July 2021. We would expect an assessment of the implications of the revised NPPF to be made available by Merton Council alongside a specific invitation to consultees to make representations on the implications.

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4. Our submission addresses those areas where we believe the Plan is not sound. It addresses not only the detail of policies but also the supporting text, the evidence base and the process through which the Plan has been prepared.

Preparation of the Plan

5. We do not consider the preparation of the Plan to be soundly based. It fails to test of soundness in being neither *justified* nor *consistent with national policy* including failing the requirement of national planning policy to “*be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees*” (NPPF, para 16c).

6. The failures in the consultation process include:

- A failure to make the Sustainability Appraisal publicly available at the start of the Stage 2a consultation process as a result of leaving it password protected
- Lack of access to key documents in the evidence base for the Plan which has obstructed effective public consultation – there was no information on the range of Local Plan research undertaken on the key public consultation pages for the Stage 2a consultation or Merton Council’s general planning page and the link now available (<https://www.merton.gov.uk/planning-and-buildings/planning/local-plan-research>) was not available during public consultation
- Errors in the information presented, ranging from maps depicting the wrong location for Merton’s Opportunity Areas to missing text and incomplete sentences
- A fragmented presentation to the consultation draft plan which was never available as a single document and parts of which were published at different times
- Poor quality map reproduction which made key information, such as the Plan’s Key Diagram, virtually illegible

7. It is bad practice not to have published a detailed audit of how the Plan has been amended in response to public consultation as part of the evidence base. The lack of attention to public consultation feedback even where it corrects errors in basic facts persists even at this late stage and undermines public trust in the robustness of the Plan’s preparation to the point where we need further evidence on the rigour of the public consultation to consider the Plan to be soundly based.

Drafting of Plan and policies

8. 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. Too many policies fail to meet the NPPF’s requirement that the Plan should “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*” (NPPF, para 16). The Plan also fails to distinguish policies from the rest of the text, usually achieved through the use of tinted boxes.

9. The Plan remains riddled with errors including references to incorrect policy numbers, syntax errors, incomplete sentences and missing text, incorrect references to the National Planning Policy Framework, factual errors, a site allocated to the wrong area, omission of a nationally listed heritage asset, confusing use of different words to describe the same issue, supporting maps that are poorly and inconsistently referenced in the Plan and incorrectly named locations in the Borough. It is grammatically illiterate in places. These problems extend to the drafting of a number of the planning policies.

10. These concerns are exacerbated by the lack of integration across the Local Plan with different chapters seeming too independent of each other and presented in different ways. The disjointed nature of the Plan is re-enforced by its fragmented presentation, lack of a contents section or even title page, and unclear structure and the publication of

different sections at different times during the consultation process. Remarkably Stage 3 is the first time the Plan has been made available as a single document. The evidence base for the Plan is also unclear and much is not available online or has not yet been completed or commissioned. This has also obstructed effective public consultation.

11. As a result of these inadequacies in the draft Plan's preparation and drafting we believe it is neither *justified* nor *consistent with national policy* and fails the test of soundness on both grounds.

Plan period

12. National planning policy is for the strategic policies of Local Plans to look ahead "over a minimum 15 year period from adoption" (NPPF, para 22). The Plan will not be adopted before 2022 at best and runs to 2036 which is a period of 14 years. On this basis we believe the Plan fails the test of soundness by not being *consistent with national policy*. We recommend it runs to at least 2038.

Spatial Vision and Objectives

13. We generally support the Spatial Vision for Merton (page 32) and, in particular, the ambitions to reduce the disparities between the east and west of the Borough, respect local character, reduce pollution and improve access to the natural and historic environment. We have very low confidence in the ability of the Local Plan either to deliver this Vision or to reconcile the inherent tensions between achieving simultaneous economic, social and environmental progress. We believe the Vision fails the soundness test in that it is not *effective* in being deliverable over the plan period.

14. One example is the failure to include any specific measures which will deliver the ambition to reduce disparities between the east and west of the Borough. The Vision is also lacking any commitment to protecting the existing scarce resource represented by Merton's green spaces, wildlife and heritage assets which is neither *justified* as an appropriate strategy nor *consistent with national policy*.

15. An example of the lack of care and attention in the drafting and the failure to address consultation feedback is that the last part of the ninth bulleted point is still missing from the Vision despite earlier representations.

16. There are a number of areas where the detail of the Plan fails to follow through on the ambition of its Strategic Objectives. For example, Strategic Objective 5 is for "supporting.....neighbourhood parades" but the inventory of "Neighbourhood parades in Merton" after paragraph 13.5.33 is both incomplete, despite earlier representations, and is shown inconsistently in the policies maps – e.g. 323-327 London Road is on *Economy Policies Map - Business and Retail LR* but does not appear on *Economy Policies Map (Mitcham)* or *Economy Policies Map (Merton)*. This aspect of the Plan is not *justified* and fails the soundness test.

Chapter 4 - Mitcham

Mitcham Village

17. Recognition of Mitcham as having a "village" and not a "town" centre needs to be central to the Plan if it is to provide an appropriate response that recognises Mitcham's intrinsic character as the starting point for considering future development. It was agreed by the Borough Plan Advisory Committee on 26 November 2020 to identify "Mitcham Village" in the Borough Character Study. The current Plan makes 28 separate references to "Mitcham town" which need to be changed to recognise Mitcham as a "village" centre.

18. It has been suggested that Mitcham must be identified as a "town centre" as a result of its classification in the London Plan. We note that this identifies it as a "*district centre*" (Table A1.1) and identifying its village qualities is not inconsistent with this approach. There is a good parallel with Carshalton Village and Cheam Village in Sutton which are identified in the London Plan as such and as a "*district centre*". London Plan

Policy SD8 also recognises the role of Local Plans in bringing forward changes to District Centres.

Key objectives

19. We welcome the proposed Key Objectives. To meet the soundness test they will only be *effective* if they are further strengthened better to reflect and deliver the overall Spatial Vision and Objectives of the Plan including by:

- Stronger centre – addressing pollution and public safety considerations in the village centre and the priority to improve the market and provide more opportunities to socialise
- Community – addressing the importance of protecting and enhancing existing community buildings and other assets and increasing their number
- Celebrating heritage – addressing natural heritage as well as historic environment and amending the incorrect reference to “*Canons House*” to “*The Canons*” (see entry on Historic England’s [National Heritage List](#)) which is incorrectly used throughout the Plan

Policy N4.1

20. To be *effective* Policy N4.1 needs to address the priorities for community investment, including local community assets, the need for a much strengthened cultural offer and improvements to public health. The significant number of independent shops and food outlets which reflect the cultural diversity of Mitcham and the opportunities presented by the longstanding street market also need to be more clearly recognised, protected and enhanced. This should be informed by a retail study examining the diversity of uses and the influences on Mitcham’s vacancy rates and economic fortunes. To be consistent with the rest of the Plan the Policy should also support “*neighbourhood parades*” and not “*local parades*”.

21. We do not consider the boundary of Mitcham’s village [town] centre to be *justified*. We believe Mitcham has many of the characteristics of a 20-minute neighbourhood, including the historic distinction between Upper and Lower Green and their provision of distinct commercial and civic functions. An *effective* boundary needs to reflect this twin centre and extending from the southern end of Figges Marsh to Mitcham tram stop, with the retail core focused on the village centre around Fair Green. This would be consistent with the broad boundary of the “urban village” agreed in Merton’s prescient Unitary Development Plan in 2003 and described as “*A mixed use neighbourhood with a maximum walking distance of 10 minutes to its centre*”. This approach should be incorporated in an amendment to the boundary of Mitcham as a District Centre in the Economy section of the Plan and reproduced in the Mitcham section.

22. The relationship of the area-based policies with the topic-based policies in the Plan needs to be made much clearer, including the location of the village centre, shopping parades, scattered employment sites and other considerations. This is part of a wider concern about the confusing and uncertain structure of the Plan.

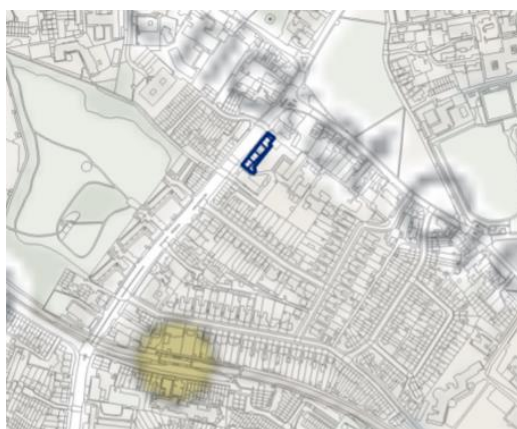
23. To be *effective* a revised Policy N4.1 should provide a much stronger and place-specific expression of the Local Plan’s Strategic Vision and Objectives as they apply to Mitcham, embracing other parts of the Plan and including:

1. Identifying the specific examples of social and community infrastructure in Mitcham for the purposes of Policy IN14.2 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

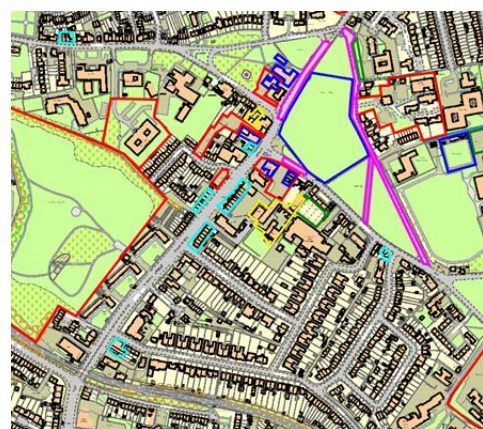
- Mitcham cricket ground
- Burn Bullock public house
- White Hart public house
- The Windmill public house
- Vestry Hall – community meeting/function rooms, voluntary and community organisations’ offices & services
- Wandle Industrial Museum – community run registered museum
- Mitcham Parish Centre – community meeting/function room and outdoor space
- Mitcham Parish Church – community uses
- 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
- New Mitcham Fire Station (with community room)
- The Canons basement, community room and community café
- Sts Peter & Paul Catholic Church – community meeting/function room
- Methodist Church – community uses
- The Ecology Centre, Mitcham Common
- Sporting and meeting facilities in local schools with community agreements

2. Adding the neighbourhood parades in Mitcham listed after paragraph 13.5.33 to support delivery of the Strategic Objective for "supporting.....neighbourhood parades" and Policy N4.1's commitment to "local parades" and to support Policy TC13.5 on neighbourhood parades plus adding the following important parades which are missing from inventory provided after paragraph 13.5.33):

- Bramcote Parade – provides an important community facility on the ground floor of a coherent set of buildings added to the Local List in 2017 and which is currently the focus of CiL investment to improve the shopfronts
- 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 – only 323-327 is recognised in the Plan (following earlier representations)



Local Plan – Stage 3



Missing neighbourhood parades light blue as submitted at Stage 2

- Monarch Parade – an important stretch of retail units on London Road - opposite Mitcham Library

3. Identifying protection of the following local employment sites in Mitcham as being "scattered employment sites" for the purposes of Policy EC13.1:

- 1-4 Lower Green West & 342-344 London Road – the site of London Box Sash Windows and the Old Bank House this site includes 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.

24. To be *effective* Policy N4.1 should be further strengthened specifically to identify the frontage to the green space bounded by Cricket Green and London Road as an area of special streetscape and heritage significance where any new development must be of exceptional design and be capable of being listed within 30 years.

25. Additionally, for the Plan to be *justified* the supporting text should:

- Reference The Canons Conservation Management Plan which was adopted as a supplementary planning document in 2017
- Provide evidence or otherwise delete the claim that the Rediscover Mitcham investment has "*helped drive extra footfall to businesses around the Fair Green*" as this is highly contested and we are unaware of any baseline being surveyed or impact studies being published which allows this assertion to be evidenced and have not been provided with them when requested
- Be consistent in referring to "The Canons" or "The Canons house" and not "*Canons House*"
- Recognise the Wandle Vistas in Mitcham and reference the award winning research as part of the evidence base – the report won the RTPI's 'Excellence in Plan Making Practice' award in 2019 but has not been addressed in the Plan

26. The supporting text also contains a number of errors, all of which were pointed out in response to earlier consultation:

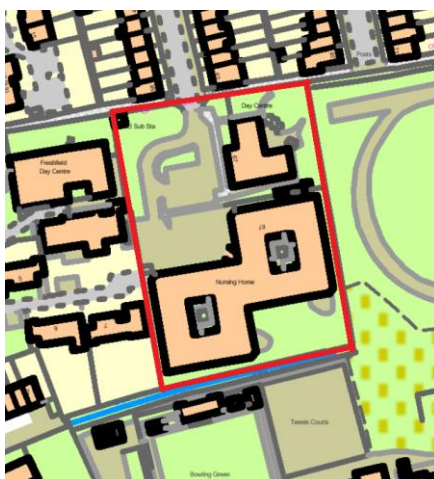
- 4.1.13 - Mitcham cricket ground is the longest continuously played cricket ground in the **world**, not the "*country*", where the game has been played every year since at least 1685
- 4.1.14 - The Canons project is funded by The National Lottery Heritage Fund and The National Lottery Community Fund and not the "*Heritage Lottery Fund*" and its aim is not "*to increase footfall and visibility*" although this will be one of a number of positive outcomes
- 4.1.16 - "*grassroots football games*" have not been played on Mitcham Common for a generation and the site where this occurred is now managed for its ecological benefit

Mitcham - sites

27. We made detailed representations in response to Merton Council's call for sites and to the first iteration of the site allocations. We welcome much of the response to our representations and many of the sites identified in and around Cricket Green. For the Plan to be sound we propose further refinements below and reaffirm the need for an additional site allocation:

Addition – 67 Whitford Gardens, Merton Dementia Hub

28. Merton Council has announced closure of the Merton Dementia Hub with services being provided in a more distributed way. This is a key site in public ownership within Cricket Green and also has a direct bearing on site allocation Mi2 for Birches Close. The fact that this announcement was after the call for sites should not prevent inclusion of the site within the Plan.



Current uses – Public health

Preferred future use – Residential (Class C3) for self/custom build with option for Residential Institution (Class C2) or Medical/Health Service (Class E(e))

Existing planning & other issues – Mitcham Cricket Green Conservation Area, Archaeological Priority Zone, Wandle Valley buffer, Cold Blows historic route, The Birches (locally listed), The Canons house and grounds (listed, SPD)

Future opportunities

- Provision of locally affordable homes in perpetuity through delivery by Community Land Trust
- New vehicle access to the Birches avoiding the highly constrained Cricket Green road
- New pedestrian route to The Canons
- Integration of design with Birches Close (Mi2)
- Public realm investment and protection of residential amenity of Whitford Gdns

29. Mi1 Benedict Wharf – This is a prime example of why the Plan needs further strengthening for it to be effective in meeting its stated Spatial Vision and Objectives. Despite a clear requirement in Policy D12.6 that “*tall buildings*” of over 6 storeys will only be permitted in the Colliers Wood, Morden and Wimbledon town centres and that development at Benedict Wharf must “*protect the amenity of adjacent properties*” planning permission has been given by the Mayor of London for a development including 10 storey residential blocks that is acknowledged to harm both designated and undesignated heritage assets, including the locally listed cottages in Church Path that lie in the Cricket Green Conservation Area. The priority for this Plan allocation now is to secure integration of the Suez site with adjacent development sites owned by Cappagh and Merton Council and a reimagining of Hollowfield Way and the permeability of the site linking London Road to Phipps Bridge and beyond. This can be achieved by:

- Committing to preparing a design brief for the wider 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 – this is envisaged in the site allocation drafting but undeliverable without an amendment to the site boundary
- Extending the boundary to include the La Sporta hall which lies empty and has potential as an enhanced community asset
- Addressing the interaction with Transport for London’s preferred option for the Sutton Link which is entirely omitted from the site allocation despite its huge significance as it runs through the site
- Recognising the adjacency of Wandle Valley Conservation Area as well as Mitcham 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 the historic 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 using Merton Council's land along Hallowfield Way
- Recognising route of Surrey Iron Railway (first public railway in the world) through the site
- Requiring investment in community infrastructure (e.g. repurposing La Sporta Hall and investment in Mitcham Parish Centre)
- Addressing the error in the site area which is recorded as being the total of land in Suez and Cappagh's ownership while the site boundary also includes significant additional land in Merton Council's ownership
- Address the mismatch between the proposed indicative site capacity for 650-850 homes and the planning consent for 850 homes for only that part of the site in Suez's ownership
- Correcting the geographical errors in the site description – Morden Hall Park is due west and not north east and Baron (not "*Barons*") Walk is east and not west of the site, as previously pointed out and as recognised elsewhere in the site allocation text
- Addressing the omission of the land in Merton Council's ownership from the site's "*Existing uses*"
- Addressing the omission of key sections from "*The site location*" relating to listed buildings, heritage assets and Conservation Areas

30. Mi2 - Birches Close – This site allocation is fundamentally influenced by the opportunity now presented for an additional site allocation for the Merton Dementia Hub (see above). This transforms the access. We do not believe the site being allocated exclusively for residential use in the event of alternative healthcare facilities being provided elsewhere is a sound approach. 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:

- Being designed for primary access through the adjacent Dementia Hub site and Whitford Gardens to recognise 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
- Requiring development to provide new access "through" as well as "*to, from and around*" the site
- Accurately identifying the existing owner as NHS Property Services and not National Health Property Service

31. Mi3 Burn Bullock & Mitcham cricket pavilion – We welcome the strong approach to this site allocation for restoration of the Burn Bullock and community ownership and management of the cricket pavilion and shed in perpetuity, 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. We share the Plan's priority to secure community ownership and use of the cricket pavilion and its operational land in perpetuity, linked to use of Mitcham cricket ground, alongside restoration of the Burn Bullock. This should additionally remove the Grade II listed 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. We support appropriate residential enabling development necessary to secure these outcomes and believe that to be considered sound the site allocation should include the

option of appropriate non-residential enabling development, such as a care home or hotel, which is compatible with other uses.

32. We have taken legal advice on the approach in the Local Plan from Town Legal and believe to be sound 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
- Inserting "The Council will (without prejudice) consider the use of compulsory purchase order powers in the event that the cricket pavilion cannot be acquired by private treaty" at the end of the first paragraph in the site allocation – the Plan acknowledges the potential to use such powers in relation to the Morden regeneration zone (Site Mo4 and paragraph 5.1.59) and they are appropriate on a smaller scale to securing the Plan's desired outcomes for this critical site
- Recognising in the site allocation that the residential development "will" be acceptable on the upper floors of the Burn Bullock "provided that the non-residential uses of lower floors are thereby implemented and secured"
- Inserting "the retention and continued operation of and" after "enable" in the final paragraph of the site allocation
- Inserting "and its" between "Mitcam Cricket Pavilion" and "associated land and buildings" in the site allocation and in the Design and accessibility guidance
- Replacing "Use of the Burn Bullock building as non-residential uses" with "Use of the Burn Bullock building in non-residential uses" in the site allocation
- Deleting "currently" in the site description's reference to use of the pavilion – the pavilion building is purpose built as a cricket pavilion and has never been used for anything else since it opened in 1904
- Replacing Mitcam cricket pavilion was "built around 1920" with "opened in 1904" in the site description and site location
- Recognising Mitcam cricket pavilion as "the oldest" not "one of the oldest" cricket grounds in the world in the site description –on the basis of the game being "consistently played since at least 1685" on Cricket Green
- Starting "Opportunity to bring an underused site at the Burn Bullock into use" as a new paragraph in the Design and accessibility guidance
- Inserting "The Council will consider the use of compulsory purchase order powers if necessary to secure the long-term future of the cricket pavilion if it appears to the Council that this is in doubt" at the end of the fourth paragraph in the Design and accessibility guidance
- Inserting "Planning obligations will be sought to ensure that a robust mechanism is in place so that any residential development on the upper floors secures and facilitates the delivery of the non-residential uses" at the end of the sixth paragraph of the Design and accessibility guidance
- Starting "Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcam Cricket Green" in the penultimate paragraph of the Design and accessibility guidance as a new paragraph
- Replace "designed" with "designated" under *Impacts a designated open space*

33. Mi5 - Land at The Canons – Notwithstanding the extant planning permission for residential development on this site we do not believe the allocation of the former nursery at The Canons for development is sound. This allocation fails the *effective* soundness test as it is not deliverable over the plan period given Merton Council's decision to wind up its property development company Merantun Development Ltd. The site only came forward and was only consented because it was owned by Merton Council and the applicant was Merton Council's own development company. An alternative developer is not a viable alternative given the planning consent was linked to the development of three other locations, not least to provide a [non-policy compliant] level of affordable housing. Merantun's closure has also demonstrated the development across these four sites is not viable. We believe there are other better uses for this land which would both retain public access and support the wider ambitions for The Canons

and Park Place envisioned in the Lottery-supported £5m+ investment in the site. Notwithstanding this view the site allocation omits a number of significant considerations, including:

- 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 – recognised as Merton’s Tree of the Year
- Addressing multiple erroneous references to “*Canons House*” instead of “The Canons”
- Updating reference to the children’s playground north of the site which is scheduled to be removed as part of the Lottery project and has been replaced by a new playground west of the site

34. 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 to be sound. 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 updated to recognise 326 London Road (Kellaway House) as a non-designated heritage asset as it was added to Merton’s Local List by decision of Merton Council on 18 November 2020. The Mitcham Cricket Green Conservation Area Appraisal and Management Plan also 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 an essential requirement of any site allocation.

35. Mi7- 370 London Road (car wash site) – There has been no prior public consultation on this site allocation as the site description provided at Stage 2a was erroneously for 326-328 London Road. We were not provided with the text for the site allocation during the public consultation period despite it coming forward as a result of our submission on the prior Call for Sites. To be sound this site allocation should be:

- correctly addressed as 370-374 London Road
- guided by the height of buildings along London Road to the south west and not the unimplemented planning permission at 360-364 London Road. Broadway Gardens provides a natural break in the townscape; the indicative site capacity for 5-8 new homes would not be consistent with a higher building; and the identified opportunity for “*strengthening and extending local retail parade*” would not be achieved by a discordant higher development

36. 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 not sound and do not effectively deliver Policy N4.1 for Mitcham. They are limited in their approach and unduly focused on retail and residential uses rather than the wider cultural needs of Mitcham for places that attract and encourage people to stay. This would include options such as a cinema, relocated library and much needed social and community infrastructure. Both sites 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. The existing Wandle Vista on the top floor of the existing multi-storey car park should be acknowledged and future public access to the rooftop of new development should be supported.

37. Mi9- former Mitcham fire station – This allocation is unsound given the recent planning permission for development of nine homes – more than double the indicative

capacity and with no mixed or community use. This is despite Merton Council controlling the right of access to the highway enabling it to exercise a significant influence over the development and use of the site. If retained the details the site allocation should be strengthened to improve the soundness of the site allocation by:

- Recognising that the adjacent war memorial has recently been Grade II listed and that the redevelopment of the Cricketers pub is complete
- Extending the boundary to include the apron down to the road given its importance to the streetscape and former function – the lack of integration of this land with the existing building has been a major problem in managing a recent planning application for the site
- Providing a clear expectation as to the required mix of uses and that this needs to include some Class F and Class E
- Ensuring the characteristic apron in front of the building is not cluttered with bins, services or parking

38. Mi11- Raleigh Gardens car park – We support the scope for residential development on this site with a retail, community or civic use on the ground floor providing an active frontage that links to London Road. We do not believe the site allocation is sound. This allocation fails the *effective* soundness test as it is not deliverable over the plan period given Merton Council’s decision to wind up its property development company Merantun Development Ltd. The site only came forward and was only consented because it was owned by Merton Council and the applicant was Merton Council’s own development company. An alternative developer is not a viable alternative given the planning consent was linked to the development of three other locations, not least to provide a [non-policy compliant] level of affordable housing. Merantun’s closure has also demonstrated the development across these four sites is not viable. Any future development must, as the site allocation indicates, *“protect the residential amenity of adjoining properties to the rear”*. This was not achieved by the development granted consent which results in 55% of Glebe Court’s windows facing the new development not meeting official guidelines for daylight and 29% being *“subject to noticeable losses”*.

39. Mi16- Mitcham Gasworks – This site allocation is unsound as it fails to recognise the gasholder to the north of the site as an undesignated heritage asset on Merton’s Local List. We support largely residential development which should also make provision for local retail and community uses. The site should significantly improve permeability between Mitcham village centre and Church Road. The site allocation should be clear this is not a location where Merton Council will permit tall buildings over six storeys and any development should respect the existing streetscape.

40. Mi17 - White Hart – This allocation is unsound given the recent planning permission on appeal for a change of use for the public house and significant development of a residential block in its car park. If the site allocation is retained we support the approach linking residential development to the restoration and viable re-use of the White Hart as a public house or similar function. The drafting needs strengthening if the site allocation is to be considered sound to:

- Provide a complete site description without any missing section and recognise the potential impact on other listed buildings and heritage assets, including the Burn Bullock
- 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 for pedestrian use only
- Require investment in the public realm and function of the Jubilee Corner junction

41. Mi18 - Wilson Hospital – There has been a significant change in this site allocation in response to indications from the Clinical Commissioning Group that the new local

health centre for Mitcham will be located on a different site. A site options appraisal is due to conclude in November 2021. We supported the original proposed site allocation for healthcare and community uses, including the requirement that residential development should only be permitted if necessary to enable wider delivery of the site. We do not consider an alternative wholly residential allocation if healthcare facilities are provided elsewhere to be sound. This significant site needs to offer more mixed use and community facilities and be driven by a clear community-led masterplan. To be sound the details of the site allocation need to be strengthened by:

- Committing to preparing a design brief/masterplan for the site, building on the [community planning and design brief](#) prepared by Mitcham Cricket Green Community & Heritage, and adopting it 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
- Requiring any enabling residential development to be supported by evidence that the site's re-development cannot otherwise proceed without it
- 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 enabling 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
- Correctly identifying the owners of the site as NHS Property Services.

42. Mi19 – Worsfold House – This site allocation was missing from the Stage 2a public consultation. It appeared on the site allocations map but was missing from the site allocations which provided details for site Mi9 (Mitcham fire station) instead. Despite representations we were not provided with details of the site allocation and so were unable to make representations. We support the approach and to make the site allocation sound it needs to be strengthened to:

- Require investment in the public realm along Church Path and on the site boundary
- Correctly identify and name listed buildings and structures with potential impacts
- Integrate with investment in London Road Playing Fields and new links consequent upon the redevelopment of Benedict Wharf (Mi1)

43. Mo3 – Imperial Fields – This allocation appears incorrectly in the Morden chapter of the Plan despite falling within the area covered by the Mitcham chapter (see map on page 117) and this error being pointed out at Stage 2a. We do not support the proposed site allocation which involves the development of Metropolitan Open Land. The text needs to be updated to recognise the Mayor of London's unfortunate decision on 26 April 2021 not to direct that he make the decision and to allow Merton Council's grant of planning permission for a significant block of flats to stand.

44. The site allocation remains wholly incompatible with the site's Metropolitan Open Land status and we note that no amendment to the MOL boundary is envisaged. The *Green Infrastructure, Biodiversity and Open Space Study* prepared by The Environment Partnership for the Local Plan's evidence base concludes that there should be no change in the status of the site as Metropolitan Open Land, Green Corridor or Open Space (below). We agree.

Other policies

Places and Spaces

Design (D12.1, D12.2)

45. The policy intent for "the highest standards of design" in development is welcome but the Policy is incapable of being delivered. Evidence of developments permitted under the current development plan with a similar policy framework demonstrates this. We do not consider the new Local Plan policies significantly strengthen the current policy framework under which so much poor quality development has been permitted. This is illustrated by the following recent examples, where planning permission was recommended by officers in all cases and all except The Cricketers options given permission:



Former Canons nursery



Queen's Head



Imperial Fields (MOL)



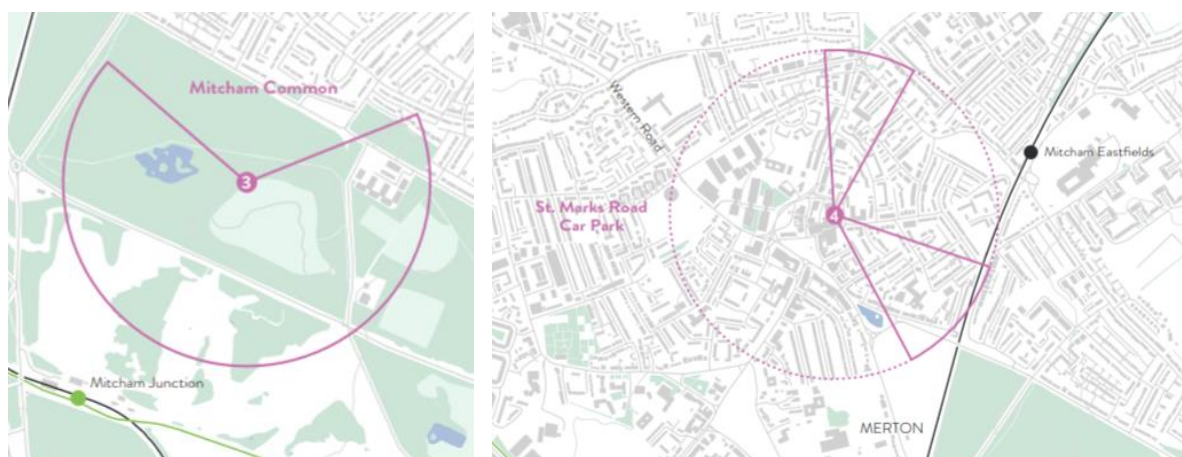
Benedict Wharf (from Church Path)



The Cricketers (various options recommended for approval)

46. Policy D12.1 should make direct reference to the National Design Code and include 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 would fundamentally affect its urban form over the period of the Local Plan.

47. Policy D12.2 should specifically recognise the Wandle Vistas identified in the award winning research commissioned by Wandle Valley Regional Park Trust, Wandle Valley Forum and Living Wandle as "*identified important local views, panoramas and prospects.*" This research provides the highest possible standard of evidence to support the Plan having been recognised with the RTPI's Excellence in Plan Making Practice award and the Landscape Institute's Award for Landscape Policy and Research. It includes guidance specifically prepared for plan-making bodies in the Wandle Valley available [here](#) and [here](#). Two of these are in the Mitcham area – St Marks Road car park and Mitcham Common - and parts of the Pollards Hill vista are also in Merton.



Managing heritage assets (D12.5)

48. The commitment to conserving and enhancing heritage assets is welcome. Policy D12.5 needs to be strengthened to be sound enough to deliver this, including by correctly referencing the 2021 National Planning Policy Framework.

49. Paragraph 12.5.6 provides a range of heritage assets addressed by Policy D12.5. All of these are identified either nationally or elsewhere in the Plan with the exception of "*Local Historic Parks and Gardens*". These undesignated heritage assets make an important contribution to the character of the Borough and they should be identified in the Plan via an inventory and map and online. The Appendices only address the four nationally graded Historic Parks and Gardens in the Borough. It is notable, for example, that Croydon's Local Plan includes 51 locations on its Local List of Historic Parks and Gardens based on criteria set by Historic England along with the London Historic Parks and Gardens Trust. Merton's equivalent should include the grounds of The Canons and Park Place, including that addressed in The Canons Management Plan which is an adopted supplementary planning document. Mitcham's registered Town Greens and the Metropolitan Commons should also be recognised as heritage assets and London Historic Parks and Gardens Trust also identifies Glebe Court Estate, Mary Tate's Almshouses, Mitcham Garden Village, Ravensbury Park, St Peter & St Paul Churchyard and Watermeads in its [inventory](#) of historic parks and gardens for Merton. The Plan needs to identify each of the Local Historic Parks and Gardens for it to be complete and *justified* and to be found sound.

50. Paragraph 12.5.6 is misleading in referencing only "*Locally listed buildings*" as undesignated heritage assets. Merton's Local List includes a range of other structures, including a gate post and a stench pipe/gas lamp in Cricket Green.

51. We do not recognise the inclusion of The Canons as a separate Conservation Area (8.4 ha) in the Appendices (page 603). The Canons is part of the Mitcham Cricket Green Conservation Area.

52. The Appendices inventory of nationally listed buildings is incomplete and has some duplicate entries. The war memorial on Lower Green West was listed Grade II on [26 July 2017](#) and appears in neither the Appendices nor the untitled Heritage Policies Map. The reference in the Appendices to the Grade II listed Obelisk needs to be updated as it has been re-united with The Canons as a result of the Lottery project (page 616). The entry is duplicated on page 610.

Economy and Town Centres (EC13.1, EC13.2, EC13.3, EC13.4, TC13.5)

53. This section of the Plan needs to be more effectively related to the individual policies on different parts of the borough if it is to be considered sound, including Policy N4.1 for Mitcham (see above), including by:

- Identifying the individual scattered employment sites (Policy EC13.3) and neighbourhood parades (Policy TC13.5) and addressing the omissions we have identified
- Supporting in Policy EC13.1, EC13.2 and EC13.4 a greater diversity in floorplate sizes and the provision of affordable workspace to support local and independent businesses (as recognised in the London Plan (publication version) policies E2 and E3)
- Supporting in Policy EC13.2 a significant enhancement of the local environment in major industrial areas, including Willow Lane which suffers from an extremely degraded public realm and turns its back on the Wandle – we also question to description of Willow Lane's "*focus on heavy industry*" (Paragraph 13.2.17) which comprises only a small component of its diverse industrial uses
- Recognising Mitcham as a "District Centre" and not a "*Town Centre*" given the need to recognise its character as a village and the District Centre classification for Mitcham in the London Plan

Green and blue infrastructure (O15.1, O15.2, O15.3, O15.4, O15.6)

54. We welcome the commitment to maintaining, enhancing and improving access to Merton's green and blue infrastructure. For the Local Plan to be *effective* it needs significantly to be strengthened to achieve this.

55. Policy O15.4 is inadequate to achieve the Plan's intentions to protect and increase the number of trees in the Borough. Our recent research into recent planning applications within just 800m of Mitcham cricket ground shows 138 trees are to be lost:



56. We have prepared a [Ten Point Plan](#) for Trees which identifies opportunities for the Local Plan, including:

- Addressing the need to increase the tree canopy (as well as the number of trees) and achieve improved urban greening in Policy O15.1
- Addressing the importance of identifying, protecting and enhancing the "landscape" in Policy O15.1 alongside "nature" and "open spaces, green infrastructure and the natural environment"
- Recognising Merton's important inheritance of common land and registered town and village greens, including in and around Mitcham, in Policy O15.1 and the environmental policy maps
- Designating all "Open Space" as Local Green Space, supported by an assessment of how it meets the requirements of paragraph 102 of the NPPF to afford greater protection
- Addressing the important contribution of ponds to Merton's blue infrastructure and identifying Three Kings Pond, The Canons pond, Cranmer Green pond and the ponds on Mitcham Common as sites for protection

57. Specifically in relation to trees Policy O15.4 needs to be strengthened to be sound:

- Establish an intention to achieve at least 10% increase in tree canopy by 2040 putting Merton on course to achieve this target as one of the first in London
- Convert the expressed intention that development proposals should "minimise impacts on existing trees" into policy by including it in Policy O15.4b and adding "and cannot be delivered in any other way, including an alternative design" to the end of Policy O15.4e v
- Recognise the value of trees lies in more than their "amenity value" as posited in Policy O15.4e.v. including their role in reducing the impacts of climate change, reducing air pollution, managing run off and supporting wildlife
- Require a net increase in tree canopy and the overall value of trees where development proposals require their loss, including accounting for lost tree years when replacing mature trees with saplings
- Extend requirements for the evaluation of individual trees in development proposals to include assessments of the value of the tree canopy and its amenity and ecosystem benefit, including a financial assessment of the value of any trees to be lost in accordance with i-Tree Eco UK and CAVAT – as used already by Merton in its parks and schools and by Camden, Richmond and other local planning authorities in London and as supported by the London Plan– which should be specifically referenced in Policy O15.4e

- Mandate planning conditions requiring all new trees provided by new development to be planted in generously sized tree pits, to be bio-secure (including avoiding invasive species) and to be maintained or replaced for a minimum of five years from completion
- Recognise that the species mix also needs to adapt to a changing climate and not be restricted to native species
- Support the use of Tree Preservation Orders in Conservation Areas, where Merton currently takes an inconsistent approach
- Support succession planting of mature trees in key locations
- Protect and replace street trees, including in relation to crossovers and utilities
- Provide a commitment to producing a Supplementary Planning Document on trees and increasing the tree canopy.

58. This will also ensure the Plan is sound in terms of consistency with the London Plan (publication version) Policy G7. We address the monitoring of delivery of this Policy below in relation to the Plan's implementation.

59. We welcome the inclusion of the valued open space behind Mary Tate Cottages (AO21) as new Open Space. The site makes a positive contribution to the area as open space by virtue of its character, whether or not it serves as a community garden or allotment. It is also recognised London Historic Parks and Gardens Trust in its [inventory](#) of historic parks and gardens for Merton.

60. We identify four further areas which should be added to the sites with protective environmental designations to make Policy O15.2 sound:

- Extend Open Space designation to the green space between Cricket Green road and Date Valley School/Brook House – this is recognised as Metropolitan Open Land but not Open Space



- Extend Metropolitan Open Land to include Mitcham Bowling Club and the whole of Bellamy's Copse adjacent to Canons Leisure Centre – this is recognised as Open Space



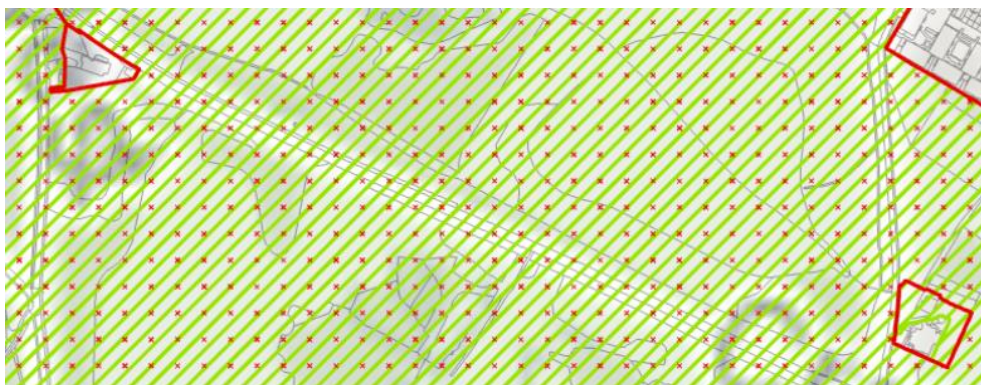
- Extend Open Space designation to include all the green space within Glebe Court and all new green space created through the Rediscover Mitcham investment (which Merton Council has also committed to registering as a village green) – visible on the right



61. We believe Bellamy’s Copse in The Canons should also be designated as a Site of Importance for Nature Conservation to make Policy O15.3 sound.

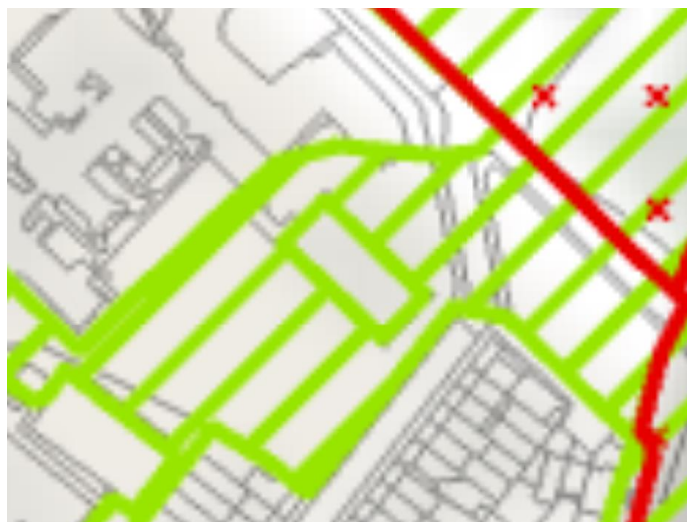
62. These locations were not addressed in the Green Infrastructure Study despite our earlier representations and further work should be undertaken to strengthen the evidence base for the submitted Plan.

63. We do not support the proposed removal of Site 26 (Ravensbury Arms) and 26a (Miller & Carter Steakhouse) from the Green Corridor. The car parks and ancillary external areas continue to provide this function which washes over the sites. The supporting Table wrongly states that “No” boundary changes are proposed to Mitcham Common’s designations.



64. We do not support the removal of an area of Site 24 (Wilson Hospital) used for the former drop-in centre from the Green Corridor and Open Space. This is a building with a temporary permission which has expired. Planning permission for the temporary walk-in centre building (14/P0825) was extended to 1 May 2017 by which time *“the use hereby permitted shall cease and the land restored to its former condition.”* The building has not been removed and the land has not been restored. NHS Property Services has recently confirmed it has no plans to extend emergency use of the building beyond the end of 2021 after which it is required to be taken away and the ground restored. It

would be perverse for these protective designations to be removed just as wider redevelopment of the site is being considered.



65. Policy O15.6 should specifically identify the opportunities for improved access on foot to the Wandle through development in Willow Lane industrial estate, complementing the approach taken to providing an 8m buffer in the draft South London Waste Plan. There is potential for a new public route running along the east side of the Wandle south from Bennett's Hole Local Nature Reserve and providing a more appropriate boundary with Willow Lane.

Housing Provision

Affordable homes (H11.1)

66. We support the Plan's expectation in Policy H11.1 for at least 50% of homes to be affordable and for a minimum of 70% of these to be for low cost rent. Nevertheless, we do not believe this will result in local needs for homes being met and so the Policy fails the soundness test in that it will not be *effective* and deliverable over the plan period. To achieve this will require additional intervention through the dedicated provision of homes for social rent, through the progressive use of public sector land and through explicit provision for self- and custom-build homes. We would support an increase in the share of affordable homes for low cost rent above 70%.

67. We are concerned that virtually no development taking place in Mitcham in recent years has been policy compliant with the existing requirement for affordable homes, including development put forward by Merton Council on its own land. This aspect of the Plan will require significant additional intervention if it is to be deliverable. It is a priority for monitoring and corrective action.

Housing requirements (H11.2)

68. We question the ability of Merton to accommodate over 11,700 additional homes by 2035/36 in a manner consistent with the Plan's Spatial Vision and Objectives for respecting the Borough's character and heritage, sustaining its communities and improving its environment. It is also dependent on achieving a level of development on large sites that far exceeds the historic record. Policy H11.2 is unsound – it is neither *justified* nor *effective* and will not be *consistent with national planning policy* for protecting heritage assets and good design. There are currently over 1,000 flats in the pipeline within a short walk of Mitcham's historic cricket ground. Their delivery will change the character of the area, for the worse, for ever while also failing to meet local needs for homes. If this requirement is adopted, then the approach to accommodating

such a large number of new homes will need to be much more discerning in its approach to the location of development to protect areas with a strong existing character.

Single aspect homes (D12.3)

69. We welcome recognition of the importance of avoiding the provision of single aspect homes in future. We do not consider such homes offer adequate living conditions and through extra demand for heating and cooling systems they will also increase energy use and run counter to the declared Climate Emergency. The approach remains unsound in that it will not be *effective* in achieving the Plan's objectives. Policy D12.3 only permits single aspect homes where there is evidence of "*adequate passive ventilation, daylight*". In the absence of any definition of "*adequate*" we do not believe this will be deliverable through development management. It is our experience that too many single aspect homes are already being permitted contrary to existing policy.

70. We believe the Plan needs to be more strongly worded to avoid single aspect homes. This should include addressing single aspect homes in the Plan's design and not just the contribution to tackling the climate emergency. Policy D12.3 should therefore address the need explicitly to avoid single aspect homes with dual aspect provision required as a minimum. This is consistent with the London Plan.

Infrastructure

Social and community infrastructure (IN14.2)

71. We welcome the commitment to social and community infrastructure. Policy IN14.2's resistance to the loss of community facilities is especially welcome. There will be some circumstances where loss is inevitable and we believe to be sound the policy should be strengthened to introduce a requirement to make equivalent or better provision in the local area in these circumstances.

72. To be *effective* and deliverable in the Plan period Policy IN14.2 also needs to be supported by a non-exclusive inventory of social and community assets. We have identified those for Cricket Green and its environs in our representations on the Mitcham section of the Plan. These should be explicitly recognised in support of Policy IN14.2 as needing protection. This level of detail would be consistent with the approach taken by the Plan to providing details of local parades to be protected.

73. To be effective the Local Plan also needs to 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. This would be consistent with the approach taken to identifying other deficiencies, such as access to open space or play provision.

Sport and recreation (IN14.3)

74. Policy IN14.35 should ensure that all development relating to sport and recreation is consistent with other policies in the Plan, including in relation to the protection of heritage, landscape and avoidance of light pollution. The Policy should also address the singular failure to secure effective Community Use Agreements in relation to a number of recent developments in local schools. As drafted the Policy will not be *effective* as it cannot be delivered in the plan period.

Sustainable Travel (T16.5)

75. We do not support the Cycle "Improvement" number 11 on Figure 10-A which involves the unacceptable loss of registered Town Green on Three Kings Piece. This impact is unwarranted and there is no link to existing cycle routes at either end. The route cannot be delivered without the loss of a significant number of trees that line Commonsides West and are located closer to the road than the width of any new cycle route (see below). It will urbanise and seriously erode the character of the sensitive boundary of Three Kings Piece. More space for cyclists should be found by reconfiguring

the existing highway (including pavement). The deliverability of these plans is highly questionable given the limited progress made on the timetable set out for financial years 2019/20 to 2022/24 and the need for Secretary of State approval were registered Town Green to be required. The proposal is unsound. It cannot be delivered within the Plan period.



76. We also question the deliverability and the practicality of Proposal TN11 for a new tram stop at Willow Lane only c200m from the existing tram stop at Mitcham Junction.

Evidence

77. We do not believe the Local Plan's evidence base to be sound. There was no information on the range of Local Plan research undertaken to inform the evidence base provided on the public consultation pages for the Stage 2a consultation or Merton Council's general planning page and the link now available was not provided. There has been no opportunity fully to interrogate the evidence base on which the Plan has been prepared.

78. Where the opportunity has been provided we have fed into work undertaken as part of the evidence base. These opportunities have been limited and the quality of much of the work has been poor. This is evidenced in our responses to the following which show documents prepared with limited insight from the local community. Merton Council refused a request for its Open Space Study consultants to meet with local community groups with an interest in parks and green spaces in the borough.

[Merton Character Study](#)
[Small sites toolkit](#)
[Open Spaces Study](#)

79. We are also concerned by the lack of an up to date retail study (including showing the diversity of uses in Mitcham village centre) and up to date Conservation Area Appraisal and Management Plans for Cricket Green (2013) and Wandle Valley (2007).

Implementation

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

- Much more comprehensive requirements for monitoring than proposed in the Sustainability Appraisal Appendix A – including addressing the following:
 - A record of the "*number of Listed Buildings at Risk*" is wholly inadequate as a means for monitoring delivery of a broad based objective "*To conserve and enhance the existing historic environment, including sites, features,*

landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings"

- A record of "*planning [sic] permission grant and completed*" provides no meaningful monitoring insight at all on delivery of the objective "*To make the best and most efficient use of land to support sustainable patterns and forms of development*"
- Monitoring information should not exclude "*educational establishments*" from the monitoring of the loss of open space to development – the merits of development for educational purposes is a matter for consideration through planning decisions and not a universal exception to an assessment of the success of the plan in delivering for open space and nature
- A record of whether developments have been reviewed by the Design Review Panel at pre-application stage is wholly inadequate as a means for monitoring delivery of the objective "*To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport*" leaving aside the significant reservations we have about the quality of design review arrangements in Merton
- Providing monitoring data to track delivery of an increasing tree canopy using i-Tree Canopy should be included
- 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 and including all representations made on applications, including from local residents
- Priorities for the use of Community Infrastructure Levy
- Support for any neighbourhood plans that come forward