



**NEW MERTON LOCAL PLAN – Public Examination – Stage 2
MATTER 1 – Plan period and clarity**

**Submission from Mitcham Cricket Green Community & Heritage
September 2022**

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 and its evidence base and we made detailed representations in September 2021, January 2021, January 2019 and January 2018 on Merton Council's call for sites at Stage 1 of the Local Plan review; the draft Plan for consultation at Stage 2 and Stage 2a; and the submitted Plan at Stage 3. We contributed to Stage 1 of the Public Examination into Merton's new Local Plan

2. This submission confirms our wish to participate in the Examination's hearing session on Matter 1.

3. We raised a series of issues regarding the Plan's period and clarity at Stage 1. These are yet to be addressed and we await Merton Council's response. In summary:

Issue 1

4. We do not consider a Plan period of 2022/23 to 2036/37 meets the NPPF's requirement for "*a minimum 15 year period from adoption*". As a matter of fact we are already six months into the beginning of this period and, as was acknowledged by Merton Council during the Stage 1 hearings, there is a high risk that the Plan will not be adopted before the end of March 2023 on the basis of previous experience and overambitious timescales

5. We are concerned that continued incremental extension of the Plan period is unsatisfactory and has implications for an evidence base which is already dated and the Sustainability Appraisal, where Merton Council's conclusion that it "*covers any necessary extension to the plan period*" is contestable (e.g. on evidence of much more rapid climate change and air pollution impacts)

6. The monitoring framework is inadequate. Important and welcome changes have been proposed in the Main Modifications but significant areas of weaknesses or omissions remain relating to, for example, heritage assets, sustainability, open space, design and tree cover. As a minimum the monitoring of these issues should include all heritage assets; address the location/type/environmental performance of new development; include loss of open space to educational uses; address delivery of and against design

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codes across the Borough's character areas; and use i-Tree Canopy as a monitoring tool. Biodiversity monitoring should be against the intention of securing a net gain over the Plan period (which is recognised in relation to Open Space but not Biodiversity) and look beyond designated areas. Given announced changes to national policy we do not support the demonstration of a 5-year housing land supply as a "key indicator". It is entirely unclear how the monitoring framework will be used to trigger action to address trends going in the wrong direction or what thresholds will trigger action.

Issue 2

7. We raised a series of issues regarding the lack of contents, confused structure, inconsistent labelling of tables and figures and a failure to distinguish policies from the remained of the Plan in our earlier evidence. We await a response from Merton Council.

8. During the Examination we also highlighted weak drafting in the wording of multiple policies and invited Merton Council to undertake a full review to ensure that each and every policy was precisely and clearly worded. This includes:

- Inconsistent use of "*require*", "*must*", "*seek*" and "*should*"
- Inappropriate use of advocacy statements (e.g. "*leading the way*", "*celebrate*")
- Lack of precision in policy expectations – e.g. "*quality housing*"