



**NEW MERTON LOCAL PLAN – Public Examination – Stage 2
MATTER 4 – Tall Buildings**

**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 4.
3. This submission addresses the relationship between the approach to tall buildings and the evidence base. We address the treatment of tall buildings through site allocations on Benedict Wharf (site Mi1) (10 storeys – outline consent) and Mitcham Gasworks (site Mi16) (varying heights in draft Local Plan and developer proposals) in relation to Matter 8.
4. We are concerned by the lack of evidence supporting the location of tall buildings in general locations and on specific sites. They are inappropriate in locations where tall buildings have no precedent and would have a significant adverse impact on the townscape and local character.
5. The Borough Character Study does not provide the necessary evidence. It is deeply flawed for reasons developed in our original response to the draft – accessible [here](#) and with an extract below:

"We do not support the overly simplistic categorisation on page 39 of the different neighbourhoods into a spectrum ranging from areas to be re-imagined to those for repair. The management of change throughout the Borough requires a much more nuanced approach. The approach also has a development focus and fails to address many of the considerations identified elsewhere in the study as contributing to local character. As a diagnostic tool we anticipate it will be regularly abused and that it will be used to justify development antipathetic to Merton's rich and diverse character. This is readily illustrated by the

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categorisation of both Mitcham and Church Road as areas to be reimagined. We recognise there are reimagination opportunities within them, including Benedict Wharf, Phipps Bridge and Sibthorpe Road car park, but the majority of both character areas demands a much more sensitive approach that strengthens and re-enforces existing character.”

6. We would consider application of the Character Study to justify tall buildings on Mitcham Gasworks (site Mi16) as an early example of the abuse we anticipated in commenting on the draft Study.

7. A “suitability heatmap” in the Borough Character Study (page 139) has been used to justify the selection of locations appropriate for tall buildings in the Local Plan. Yet, the “*key site allocations suitable for residential development*” in the Local Plan is used as an input to the heatmap used in the Borough Character Study. The result is a circular argument where the evidence used to justify suitable locations for tall buildings in the Local Plan is itself justified by them being identified as suitable in the Local Plan.

8. Similarly, we dispute the implication that there is evidence supporting tall buildings on Benedict Wharf (site Mi1). These issues were addressed in our detailed representation at each and every stage of this planning application and in the community design workshops we initiated with Suez. Suez’s own workshops rejected tall buildings as an option and all the evidence we reviewed during consideration of the planning application, including a deeply flawed Heritage, Townscape and Visual Impact Assessment, supported this view. Community preferences have been ignored. Our analysis was supported by an independent review commissioned from Create Streets. Full details of these representations are available [here](#). The Local Plan can still influence the future development of the site and the details of the development which comes forward and we seek modifications which address our earlier representations and the recommendations made by Create Streets.

9. We are also unaware beyond being general consultees on the Local Plan of any arrangement for consulting with neighbouring boroughs on the proposals for tall buildings despite their visual impact. This further weakens the evidence base.