



## **NEW MERTON LOCAL PLAN – Public Examination – Stage 2 MATTER 8 – Site allocations**

### **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 8. We have a particular interest in the following allocations addressed in the Examiners questions:

#### Mitcham Gasworks (Mi16)

3. We await and will wish to respond to any Topic Paper produced on Mitcham Gasworks.

4. We have addressed the weakness in the evidence base and justification for including reference to "*tall buildings*" in the site allocation for Mitcham Gasworks in our earlier representation and our representations on Matter 4.

5. We have been dismayed by the changes proposed to be made to Site Allocation Mi16. We supported the approach in the submitted Plan with a site capacity of 200-400 homes.

6. This was changed in March 2022 as follows:

#### **Mi16 Mitcham Gasworks**

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 9 storeys subject to consideration of design policies ~~impacts on existing character, heritage and townscape.~~

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7. No explanation of the change of mind to support up to 9 storeys or remove reference to character, heritage and townscape was provided.

8. The approach was changed again in May 2022 as follows:

**Indicative site capacity:** ~~200-400~~ Around 650 new homes

...

**Approach to tall buildings:** A mixed-use redevelopment of the site could include taller buildings of up to 10 storeys subject to consideration of design policies, along with a replacement telecoms mast on top of the tallest building. ~~impacts on existing character, heritage and townscape.~~

9. No explanation was provided for the dramatic increase in capacity since the submitted plan or that proposed to be modified in March 2022. Nor was any provided for the support for development up to 10 storeys.

10. A Statement of Common Ground with St William was published on 22 May 2022 stating as areas of agreement that:

- *Mitcham Gasworks site (Mi16) is suitable for tall buildings and the reference in the draft site allocation Mi16 to the potential for taller buildings is agreed*
- *The inclusion of Mi16 within draft Policy D12.6 relating to tall buildings is agreed*
- *The initial townscape evidence demonstrates that heights of up to 10 residential storeys would be acceptable subject to consideration of design policies*

11. The *townscape evidence* referenced as providing evidence supporting heights up to 10 storeys is:

- woefully inadequate as an evidence base providing selective, partial and poorly presented information; and
- highly selective in the locations chosen to illustrate the impact from the proposals – excluding for example distant views from Mitcham Common and immediate views from adjacent properties in Portland Road and Hay Drive significantly impacted

12. Many of the images shown serve only to demonstrate the unsuitability of the site and the significant detrimental impact tall buildings will have, entirely out of character with the surrounding area.



13. We have been provided with no other evidence to justify these changes although reference was made during earlier hearings to detailed conversations between the planning authority and the prospective applicant for the site. Remarkably the only justification provided at the "public consultation" event held by the developers on 20 September 2022 for 10 storeys was that *"The emerging Merton Local Plan describes*

*Mitcham Gasworks as suitable for buildings up to 10 storeys*". This is an entirely circular argument. We understand that planning decisions should be "plan-led" and not developer-led. In this instance we have the tautology of a developer-led plan and the resulting proposals are highly damaging to the local area.

14. Additionally, we wish to draw the Examination's attention to:

- The results of a street audit undertaken by local residents of those living within 100m of the proposed site. This shows a remarkable 99% of the 298 residents spoken to in 175 homes say they are "*extremely concerned*" about the emerging plans. This provides unprecedented clarity about local preferences for the site which reject tall buildings. The results are in the Annex.
- The continuing failure of the site developer, St William, to engage meaningfully with local people. It has conducted three faux public consultations for a few hours each during the working day that have provided scant information about the plans. A majority of the panels displayed at the second event repeated information provided at the first. The developers have refused all requests to provide full images of what they propose for the site which show the complete development in context. They have refused to share the information provided to Merton's Design Review Panel despite one of its meetings happening less than 48 hours after a consultation event. Merton Council has also failed to respond to a Freedom of Information request for copies of the information received on the site within the statutory deadline.
- St William has informed us that the latest proposals presented to the public on 20 September 2022 for around 600 homes rising to 10 storeys require 29% of the flats to be single aspect. This is contrary to London Plan Policy D6 and emerging Local Plan Policy D12.3 given the significant design flexibility offered by this large brownfield site which enables the expectation of no single aspect dwellings to be met. It further demonstrates the overdevelopment of the site that would result from an unsuitable site allocation. It is entirely unacceptable for Merton Council knowingly to negotiate with a prospective developer to agree a site allocation in a Local Plan which will conflict with a policy elsewhere in its own Local Plan for single aspect dwellings to be "*strongly discouraged*". The result will be nearly one third of the residents of the new development living in overheating and poorly ventilated flats.
- Our strong support for development of the site as set out in our summary of [Site Expectations](#) in the Annex – we ask that the Policy is modified to adopt this approach

#### Benedict Wharf (Mi1)

15. We await and will wish to respond to any Topic Paper produced on Benedict Wharf.

16. We are not confident in the speed with which the site will come forward for development. This follows the sale of SUEZ UK to Macquarie as a requirement of the Competition Commission's investigation into the merger of Veolia and SUEZ. We have been informed that no decision has yet been made by the new owners on the investment needed for the new site on Beddington Lane which will enable the waste management operation to move out of Benedict Wharf.

#### Land at The Canons (Mi5)

17. Merton Council has recently re-affirmed its plans to develop this site. The Ecological Appraisal undertaken for the site concluded it has "*significant ecological value*,

*as it has been left unmanaged for some time, and has developed a seminatural character". By contrast, as noted by the Arboricultural Report, "The final design has extensive building and hardstanding cover, with small areas of soft landscaping".*

18. The development will also significantly compromise the majestic Pagoda tree on site which was recognised as Merton's Tree of the Year. This mature specimen will be reduced by around 50% in size, hemmed in by development and we fear for its long term future. The proposed development will also compromise the recent £5m Lottery-funded investment in the historic landscape of The Canons of which the site is an integral part.



## **MITCHAM GASWORKS SITE EXPECTATIONS January 2022**

Mitcham Gasworks is identified in Merton's draft Local Plan as a site for significant residential development (site Mi16). This note sets out the expectations of Mitcham Cricket Green Community & Heritage, a local civic society, for future development of the site.

- 1. Design approach** – the development should be conceived as a street-based natural extension of Mitcham, providing a mix of residential types (including houses) in buildings that recognise the village character of the adjacent centre and respect existing nearby building heights, character and materiality. The capacity of the site is within the range of 200-400 homes specified in the draft Local Plan and it is not identified as suitable for tall buildings of six stories or more.
- 2. Western gasworks site** – the development should complete and complement the earlier development of the western part of the Gasworks site. This includes extending Brickfield Road, making links to Fox's Path and providing strong ecological, hydrological and landscape integration with the contoured open space east of Hay Drive. The design of the site should acknowledge its 150 year history as a gasworks.
- 3. Site use** – the site should be predominantly residential with provision for community uses, including community event/meeting space managed by the local community. There is a shortage of play space in the surrounding area and play should be integrated across the scheme.
- 4. Permeability** – the site boundary should be fully permeable and an enhanced route for cyclists and pedestrians along Portland Road and Lewis Road to Church Road should be provided. There should be no vehicle route through the site.
- 5. Field Gate Lane** – significant widening and improvements to Field Gate Lane and its boundaries should be provided making it suitable as a green route for both pedestrians and cyclists while also respecting its character as an historic route and avoiding engineering to highway standards. Access through to Pear Tree Close/Westfield Road should be integrated into the changes.
- 6. Boundaries** – sensitive, green boundaries should be provided where required around the site and around each of the two remaining Pressure Reduction Stations.
- 7. Affordable homes** – there should be a minimum of 50% affordable homes with the majority provided for social rent.



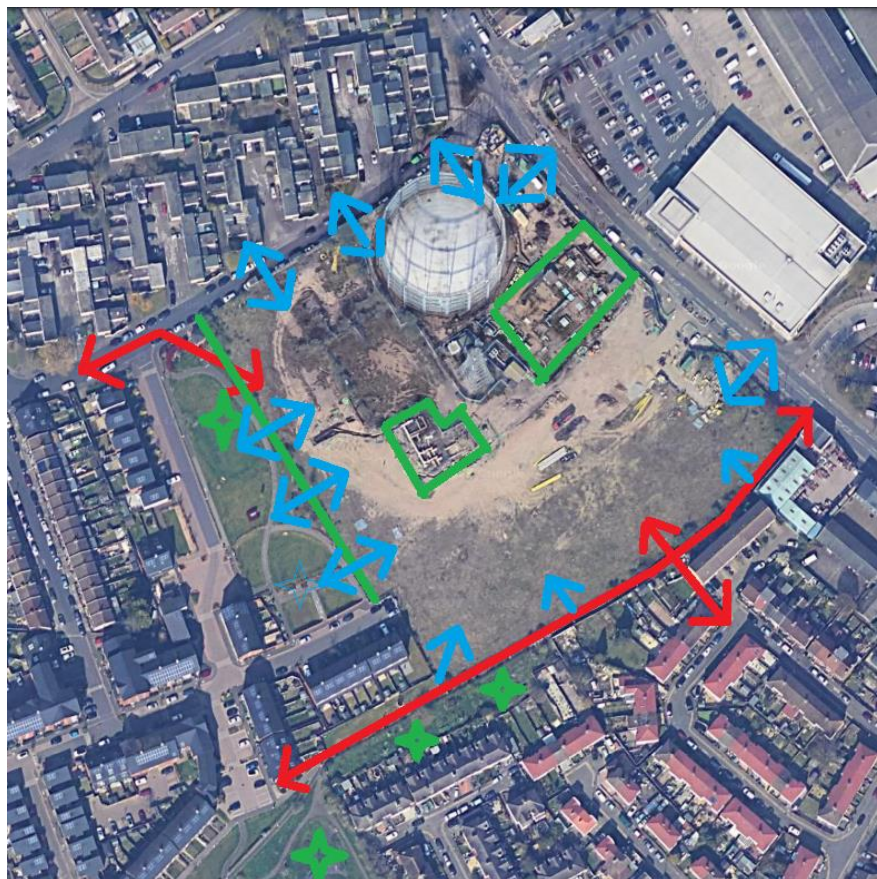
**8. Single aspect homes** – no single aspect homes should be included –there are no overriding design constraints that mean all homes cannot be at least dual aspect as required by the London Plan.

**9. Greening** – the site should become an exemplar for achieving ecological gain, significantly exceed the minimum Urban Greening Factor and contribute to tackling the climate emergency in its construction and energy use.

**10. Archaeological investigation** – this is a prime area of archaeological interest, including significant finds during the original development of the gasworks and archaeological studies indicating the possibility of a Roman well on site. A full site investigation should be completed prior to any development or further site clearance. Any significant results should be interpreted and integrated into the scheme's design.

**11. Community Investment** – development proposals should be accompanied by a Community Investment Programme secured through a s106 obligation, including benefits for Miles Road Playing Fields, Mitcham Community Orchard, Abbeyfield Close Recreation Area and Mitcham Parish Centre.

**12. Design process** – this should reflect national planning policy favouring close working with the local community and use of creative design tools (NPPF, paragraphs 1132, 133) - a community-led design charrette is preferred resulting in an outline masterplan. A public exhibition of a single option for development of the site which has only received external input via Merton Council's Design Review Panel will not be considered an acceptable process.



Improved routes – RED ARROWS  
Permeable boundary – BLUE ARROWS  
Sensitive boundary – GREEN LINES  
Greening opportunities – GREEN STARS

# MITCHAM GASWORKS – STREET AUDIT

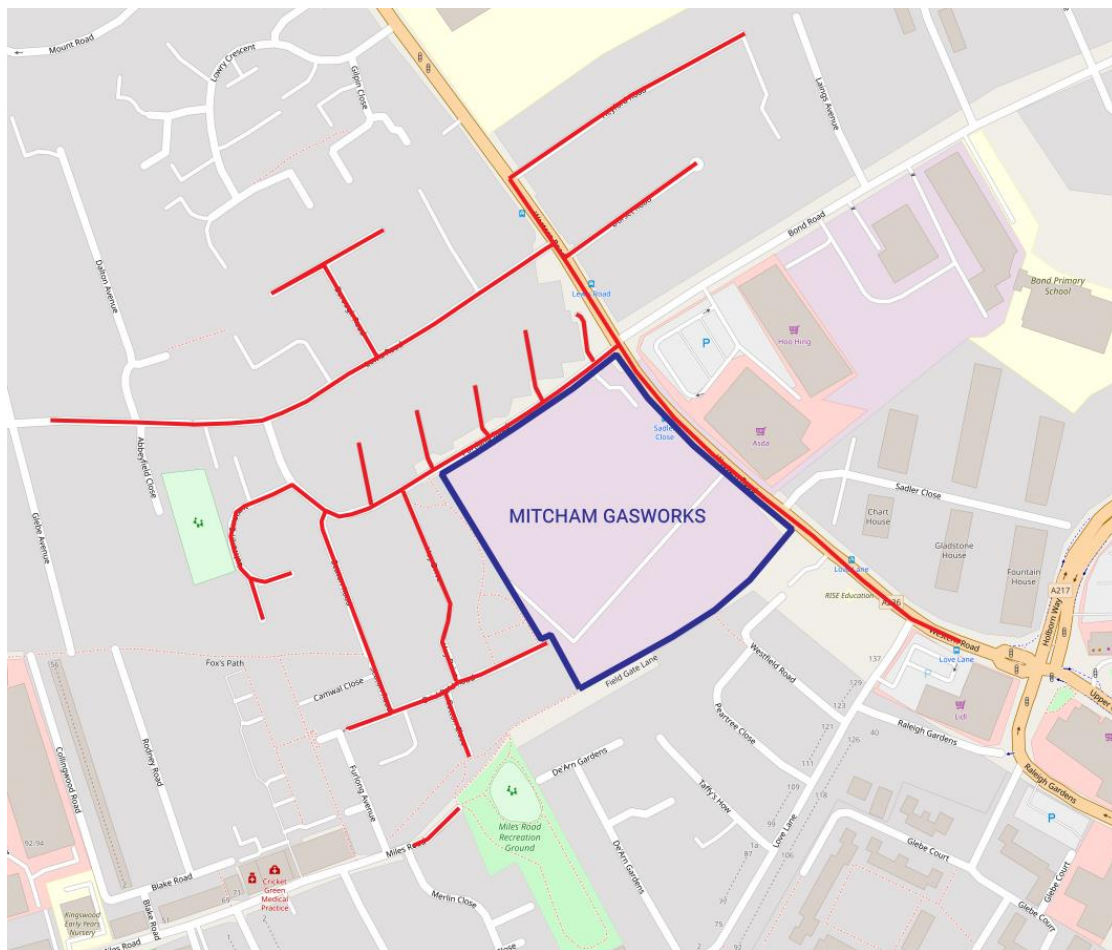
**99% residents living with 100m of Mitcham Gasworks reject plans for 10 storey tower blocks**

A door-to-door Street Audit of residents living within 100m of Mitcham Gasworks has 99% signing up to say they are “*extremely concerned*” by plans for 10 storey tower blocks on the site.


295 people living in 173 homes near to Mitcham Gasworks have signed a letter to Merton councillors expressing concerns at the current plans put forward by housebuilders. Only 3 people from 2 properties did not sign and none of the people visited supported the plans.

Local residents “*support the development of the site in a sensitive manner, consistent with the local area*” and are asking Merton Council to change its Local Plan to require a different approach. This would allow up to 400 homes rising to a maximum of six storeys.

The Street Audit was conducted on the roads marked red on the map. The letter and full street-by-street results of the Street Audit are available [here](#).



This Street Audit was undertaken by local residents campaigning for sensitive redevelopment of Mitcham Gasworks to provide truly affordable homes and jobs in a development sympathetic to the character of Mitcham Village. Contact us to get involved:

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July 2022