

Please find copies of our response to these important draft Supplementary Planning Documents attached.



They are both very welcome initiatives which could do much to improve the quality and design of new development.

The Character Study lacks the detail necessary to do justice to the richness of local character in Cricket Green and Mitcham. It devotes just 103 words to describing Cricket Green's Character which compares poorly to the 1,493 used in the Cricket Green Character Study prepared in 2012 which was never finalised and is now being discarded.

We also support Mitcham Society's representations to recognise "Mitcham Village" as one of the Borough's 36 neighbourhoods - this captures the essence of the neighbourhood's character in the manner necessary to inform an appropriate scale and type of change. This change was recognised by the Borough Plan Advisory Committee.

We have published a blog on the issues arising which can be viewed here <https://mitchamcricketgreen.org.uk/2021/03/20/capturing-cricket-greens-character/>

Our representations include detailed changes to the text proposed for Cricket Green and we commend these to you:

TRACKED CHANGES	AMENDED TEXT
 <p>CRICKET GREEN</p> <p>Distinctiveness - heritage and key features</p> <ul style="list-style-type: none">• Area centres on the historic Cricket Green (where the game has been played every year since 1685 on as early as 1707) and the exceptional quality of development from different periods around it• Mainly residential Significant civic and institutional presence and modest scale and informal layout of buildings- larger plot sizes to southwest and low rise institutional buildings to north• Majority lies within the Mitcham Cricket Green Conservation Area and a high density - number of listed and locally listed buildings including Mitcham Parish Church, Mitcham Court Mitcham Cricket Pavilion and the The Canons hHouse & dovecote• Unifying ssense of openness and small scale character - semi rural in parts with mature trees, a complex network of registered Town Greens and other green spaces and sensitive lighting its green spaces all key to its character• Housing varied in scale from high quality residential blocks blocks of flats to 1930s detached housing and small scale Victorian cottages and terraces <p>key issues / opportunities</p> <ul style="list-style-type: none">• Heavy traffic along London Road, Church Rd and Madeira Rd• New and enhanced pedestrian routes providing new links and reducing severance caused by heavy traffic Pedestrian movement between open spaces hampered by the roads• Sensitive infill opportunities that reinforce historic setting character and strengthens key views into the Conservation aArea• Reveal significance of Tramway Path Cricket Green's story and strengthen Conservation Area identity through quality of new development, tree planting and public realm• Explore opportunities to Sustain shopping parades and bring vacant pubs on Cricket Green back into good use• Repurpose institutional buildings and grounds and heritage buildings at risk without damaging historic character	 <p>CRICKET GREEN</p> <p>Distinctiveness - heritage and key features</p> <ul style="list-style-type: none">• Area centres on the historic Cricket Green (where the game has been played every year since 1685) and the exceptional quality of development from different periods around it• Significant civic and institutional presence and modest scale and informal layout of buildings• Majority lies within Mitcham Cricket Green Conservation Area and a high density of listed and locally listed buildings including Mitcham Parish Church, Mitcham Cricket Pavilion and The Canons house & dovecote• Unifying sense of openness and small scale character - semi rural in parts with mature trees, a complex network of registered Town Greens and other green spaces and sensitive lighting all key to its character• Housing varied in scale from high quality residential blocks to 1930s housing and small scale Victorian cottages and terraces <p>key issues / opportunities</p> <ul style="list-style-type: none">• New and enhanced pedestrian routes providing new links and reducing severance caused by heavy traffic• Sensitive infill opportunities that reinforce historic character and strengthen key views in the Conservation Area• Reveal significance of Cricket Green's story and strengthen Conservation Area identity through quality of new development, tree planting and public realm• Sustain shopping parades and bring vacant pubs back into good use• Repurpose institutional buildings and grounds and heritage buildings at risk without damaging historic character

Thanks

Secretary

**Mitcham Cricket Green
Community & Heritage**

For the benefit of Mitcham Cricket Green
Conservation Area and its environs



MERTON SMALL SITES TOOLKIT
Response from Mitcham Cricket Green Community & Heritage
March 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, the Conservation Area Appraisal and Management Plan, The Canons Supplementary Planning Document 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. The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We have also contributed to production of the Merton Heritage Strategy as a member of the Merton Heritage Forum. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run Mitcham Heritage Day and Community on the Green.

2. We warmly welcome the production of the Small Sites Toolkit and the intention to adopt it as a Supplementary Planning Document (SPD). It is a helpful complement to the Local Plan. To be effective it needs to be supported by among other things (a) strengthened Local Plan policies and site allocations (including drafting the key section of Strategic Policy LP D5.1 so it makes grammatical sense instead of "*The council will require all development to be of the highest design quality long-term economic prosperity and quality of life*"; (b) improved arrangements for Design Review that enable it to continue to operate on small sites, and (c) training and development of design literacy in planning and highways officers and members of the Planning Applications Committee.

3. There is much to welcome in the Toolkit. If it is followed there will be a significant improvement in the quality of development on small sites. Nevertheless, there are numerous examples within one kilometre of Mitcham cricket ground of developments over the last 10 years which fail to follow the guidance in the Small Sites Toolkit. A number of examples used in the Toolkit to illustrate good practice only exist because of local community action to demand better quality development. Inferior proposals for the sites in question were recommended for approval by Merton Council officers. Effective delivery of the Toolkit will require a sea change in Merton's culture for securing quality design, early community engagement and addressing local preferences. We encourage Merton Council to invest in the delivery of this sea change over the period of the next Local Plan and it will require much more than the simple publication of a Toolkit.

4. Our comments are structured according to the draft document's page numbers:

Page 6 – the additional references should also include the National Model Design Code and the full range of local design tools and processes where relevant, including other

General enquiries: info@mitchamcricketgreen.org.uk
Web site: www.mitchamcricketgreen.org.uk
Twitter: [@MitchamCrktGrn](https://twitter.com/MitchamCrktGrn)

Registered Office c/o MVSC, Vestry Hall, 336/338 London Road, Mitcham, Surrey, CR4 3UD
Company registration no. 04659164 Charity registration no. 1106859

SPDs (e.g. The Canons Conservation Management Plan), local design guides, masterplans and design codes

Page 11 – Design Process – the approach described is too limited and not consistent with that expected in national planning policy and the National Model Design Code. It should include early engagement with local resident groups and civic societies and not just reference Merton Council’s pre-application advice service and the Design Review Panel. As national planning policy states:

"Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

NPPF (para 128)

Similarly the National Model Design Code states:

"...communities need to be involved at each stage of the process in order to gain measurable community support that is appropriate for the scale and location of new development. This will address the ambition in a new planning system to bring democracy forward so that communities decide what good design means locally..."

NMDC (para 14)

Page 27 – The “Made in Merton” design principle is welcome. It also needs to embrace local preferences as expressed by community groups and residents in addition to the vision of the Local Plan and the Character Study. This will make it consistent with national planning policy which emphasises the need to “*reflect local character and design preferences*” (NPPF revised draft para 127). The link in the Toolkit to the Icen report on resident perceptions of development is not working.

Page 27 – Encouraging active travel is a welcome inclusion but it does not fit into the “Made in Merton” design principle. It is not distinctive to the Borough and needs to be accommodated elsewhere.

Page 29 – This is one of a number of places where the Toolkit wrongly limits its application to “*new homes*”. It is relevant to small sites being used for other purposes.

Page 31 – It is clear from Section 28 of Merton’s Validation Checklist for planning applications that a Heritage Statement is a requirement and not optional in relation to development impacting a designated heritage asset, including listed buildings and conservation areas. The wording of paragraph 5.1.5 that a Heritage Statement “*may be necessary*” needs tightening.

Page 31 – The Toolkit is unhelpful in limiting its consideration of the “*natural environment*” in paragraph 5.1.8 to protected trees. Among other considerations it should address opportunities to conserve and protect green spaces and support increased wildlife

Page 32 – Advice on tall buildings should identify there is only a limited number of locations in the Borough where buildings of six storeys or more or more than 18m tall are considered appropriate by the Local Plan

Page 87 – A Design and Access Statement should include the process and results of community engagement undertaken to inform the design and demonstrate how the

proposal responds to local preferences – this should be addressed in the accompanying template

Page 91 – National and local listing applies to structures as well as buildings – including in Cricket Green to a horse trough, stench pipe, cart dip, obelisk and war memorial. The definitions should recognise this as they are important considerations for new development

Page 92 – “Neighbourhood Plan” should be include in the Glossary to be consistent with the inclusion of “*Local Plan*” and “*London Plan*”