Please find attached our response to the Merton Character Study 2021 consultation.

Thanks

Sandra

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Merton Character Study 2021

Mitcham Society comments

March 2021

Mitcham Society participated in the Borough Character Study workshop held in November 2020.

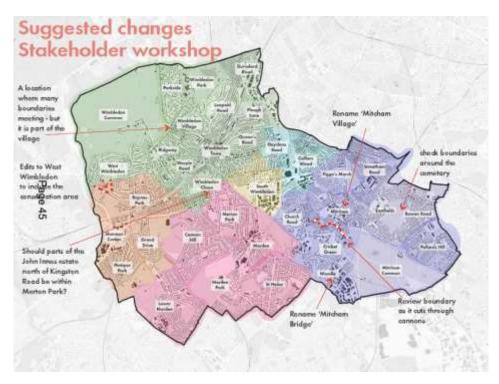
We now present these comments on the draft Merton Character Study.

Mitcham – a 21st Century Village

In our comments on Merton's Local Plan consultation 2a (online here), we made clear and firm representation on the designation of Mitcham Village.

We also discussed the designation of Mitcham Village at the November borough character study workshop.

Our recommendation was taken on board and the map presented to the Borough Plan Advisory Committee meeting of 26 November 2020 (agenda) included a recommendation to rename Mitcham to Mitcham Village.



The draft Merton Character Study is clear that the village feeling of Mitcham centre is one of the things that makes it special, and this is highlighted in a key graphic containing the quotation "What you said was special Easy commute to work, small shops and historic features, diverse, green spaces everywhere, village feeling of the town centre". It is also noted as one of the comments made in the November workshop (consultation summary, unpaginated).



It is therefore surprising and sad that the designation of Mitcham Village does not make an appearance in the draft Merton Character Study. The omission of this key policy level designation leaves Mitcham Village open to a level of development which would destroy its village character for ever.

We repeat in italics below our rationale for recommending the designation of Mitcham Village presented in our comments on the Local Plan 2a consultation. This rationale applies equally to the Merton Character Study. Further detail and specific reference to Merton Council policy relating to Mitcham can be found in our comments on the Local Plan 2a consultation, online here.

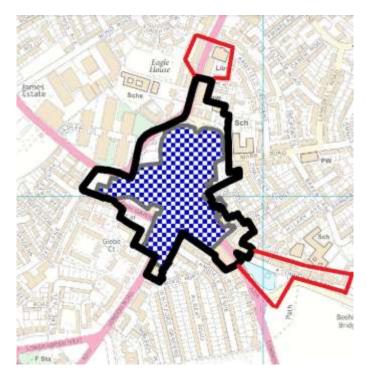
Mitcham is a 21st Century village at its heart. Its central focus is what remains of Fair Green, extending to Figges Marsh, Three Kings pond and Piece, and onwards to The Canons, Cricket Green and its various greens, and Mitcham Common. Mitcham Village has a clear physical identity and function that reflects its heritage and speaks to its role as a 21st century village.

Mitcham Village is under increasing development pressure, and it is vital that its village character is recognised, celebrated and supported in the Local Plan if it is not to become overwhelmed by development that is detrimental to its character and causes it to become a bland 'anyplace'.

Ours is not a nostalgic view. We are clear that our aspiration is for a 21st Century village which reflects the diverse and vibrant communities and cultures that make up the population of Mitcham, and sits well with the aspiration of the Local Plan to deliver 20 minute neighbourhoods.

Mitcham Village today provides a range of retail and other facilities including banking, grocery and supermarket shopping, Post Office, vet, eat-in and takeaway food, optician, key-cutting, undertaker, two pubs, newsagents, estate agents, dentistry, and a street market. A high proportion of the retail offer is made up of independent stores. As the Local Plan points out, retail occupancy is high.

The Merton Character Study should designate Mitcham Village in place of Mitcham Town Centre. We have proposed a revised boundary designation for Mitcham Village shown below.



This has two extensions on the area designated in the Local Plan consultation 2a, whose boundary is marked in black on the map. The extension, marked in red are:

- 1. An extension of the town centre area to the North to embrace Mitcham Library on one side of London Road and the Monarch Parade shops on the opposite side of London Road. Both are physically and functionally part of Mitcham Village.
- 2. An extension to the East to embrace Three Kings Pond and the terraced cottages of Commonside East which form a natural part of Mitcham Village.

Understanding the value and character of Mitcham

The role of the Merton Character Study is clearly stated on p6, and this includes "to inform a character and 'place-based' approach to managing growth in the borough." It is further stated that "Where areas have a strong existing character this will be reinforced and protected."

These are laudable aims. This section of the Character Study is also explicit that "In many ways the character of a place is defined by an individual's perception of it."

We agree with this, and we have real concern that the character of Mitcham is not understood by Merton Council officers who will implement policies in the Local Plan and take account of documents like the Merton Character Study when it is a Supplementary Planning Document.

Our evidence for this comes in the way Mitcham is defined and 'understood' in the Local Plan. We note in our comments on the draft Local Plan that the Good Growth Strategy berates Mitcham centre for lacking "high street brands" which it identifies as "clothes store to coffee houses" (sic), and states that because of this "the town centre has limited choice".

We point out that this is an entirely partial, personal interpretation of 'choice' and note the range of retail opportunities on offer in the centre – which includes 'brand' supermarkets, (see above for our note on the range of the retail offer).

We further note in our comments on the Draft Local Plan that Chapter 11 Economy point 7.5.15 accurately notes that "Mitcham has a unique cultural identity and character", but makes no attempt to describe or understand that uniqueness, and that Chapter 5, Mitcham, point 1.2.2 notes "vacancy rates in Mitcham are generally low (lower than average in England and in London)".

These views are somewhat contradictory, and one of our recommendations on the Draft Local Plan is that the Good Growth Strategy should be rewritten to:

- Reflect the true character of Mitcham Village
- Recognise and celebrate the value its diverse culture brings
- Describe the true range of the existing retail offer, the range and diversity of independent retail and the exceptionally low premises vacancy rates

We repeat this in our comments on the draft Merton Character Study because we feel there is a lack of depth and detail of understanding of Mitcham as a whole and of its neighbourhoods as defined in this document.

The summary reports for each Mitcham neighbourhood, pages 84-90, describe each neighbourhood's distinctiveness – heritage and key features, and key issues / opportunities in just a few bullet points each. If a character study is going to go to the bother of defining and then describing the relatively small areas defined as distinct neighbourhoods, then it should do each neighbourhood justice, and just a few words is simply not enough to achieve that goal.

Weasel words do not help. On page 82 we read "It is easy for Mitcham's 'big pieces' to steal the limelight, but just as important to Mitcham's identity are the smaller, more hidden, 'yokey' spaces in the borough and the diverse communities that value them." Setting aside the conflation here of Mitcham and 'the borough', we would like to comment further on this point but have no idea what 'yokey' means.

Re-examine, reimagine and repair

We do not support the location of each neighbourhood on a linear scale of' Repair', 'Re-examine' and 'Reimagine'.

This is a simplistic approach which can't take account of the diversity and complexity of the defined areas. The definitions provided for each of these three points on the scale are based entirely on development sites and new build, completely failing to define an approach to other aspects of character such as green or blue infrastructure, public realm more generally and access and accessibility (e.g. pedestrian, cycle, public transport, private car). We reject this approach as narrow and confined, and lacking the ability to reflect the subtlety of each neighbourhood.

Place intensification - re-imagine

More fundamental intervention through the redevelopment of larger sites or centres to be bolder about the level of change, using the prevailing character from surrounding areas to influence re-design

Place intensification - re-examine

Some interventions possible to reflect the existing character through the redevelopment of available sites, generally along and behind high streets

Place intensification - repair

Enhance the existing character through infill, re-use of existing building fabric and development that is sensitive and context-led

We also reject the positioning of Mitcham on the scale presented on p39 under 'Reimagine'. It is certainly not an appropriate area for "Fundamental intervention through redevelopment of larger sites or centres to be bolder about the level of change". This level of intervention will only achieve the destruction of the delicacy and human scale of Mitcham.

If this simplistic classification must be used, then Mitcham is better positioned somewhere between 're-examine' and 'repair'. From those two definitions it would benefit from interventions which reflect existing character (re-examine) and reuse existing building fabric and development that is sensitive and context led (repair).

To be clear, Mitcham has vibrancy, diversity and strength. It has a rich history and a culturally rich present. These characteristics should be understood and celebrated, used as the building blocks for what comes next. The danger of seeing Mitcham, Mitcham centre and other Mitcham neighbourhoods which appear at the 'reimagine' end of the scale (Mitcham Bridge, Figges Marsh, Church Road, Pollards Hill, Eastfields, Shannon Corner) as a 'blank canvas' suitable for a 're-imagine' approach is that their character is lost. This must be avoided.

General comments on the east of Merton

The east of Merton is broadly speaking characterised by narrower streets than the west, and while there are some excellent green infrastructure elements such as Mitcham Common and the various Mitcham greens around the Village and Cricket Green, there is also, in some areas, a real lack of green infrastructure.

This means any intensification of residential or other building can have a significantly adverse effect. The emphasis should rather be on retaining and enhancing green spaces, setting out new open spaces, replacing lost street trees and planting new ones, more in the East than the West, in order to protect and preserve the green infrastructure that exists.

In a related point, the general emphasis on building upwards to achieve intensification – such as is suggested for some shopping parades (p90) – would be detrimental to the character of those parades and contribute to what is already apparent in some parts of the East as over-intensification.

Mitcham – growth themes

Intensifying Mitcham town centre and improving connections to it from nearby neighbourhoods

We agree that

- Mitcham Village (referred to as the 'town centre') is a vibrant and resilient hub of activity.
- There are significant opportunities to 'repair'. This begs the question why Mitcham and six other Mitcham neighbourhoods are positioned under 'reimagine' in the already debunked linear scale.
- "The history, existing scale and massing of the town centre should inform a tailored and place based strategy for growth which will help Mitcham town centre to be the beating heart for the area again." However we temper this view with the recognition that Mitcham Village can not accommodate a degree of intensification that will harm its village character, open views, low rise buildings and market square.

We disagree that

• There are significant opportunities to intensify. Any intensification in Mitcham Village runs the risk of destroying the village character. We have seen too many examples of poorly designed, overly tall, bulky and massed developments. As sites come up for development in Mitcham Village and its surroundings, including sites identified in the Draft Local Plan that include significant, large sites in Mitcham Village and several site on its borders, we fear that intensification will mean the loss of the essential character of Mitcham Village. What is needed for sites in and around Mitcham Village is sensitivity rather than intensification.

Establishing London Road as a key corridor in need of improvement

We agree that

- London Road should be established as a green spine, that there should be walking and cycling improvements, and that London Road should be a more attractive connector between green spaces and local centres.
- We welcome the suggestion that development of sites along London Road should prioritise high quality environment.

We would like to see added that

Development along London Road Glebe Court side should be set back to align with Glebe
 Court, and should be landscaped to the front as Glebe Court is, to foster this sense of

connectivity between the Mitcham and Cricket Green neighbourhoods and their greens, and create a green corridor that connects the two neighbourhoods.

Celebrating the identity and resilience of local neighbourhoods

We agree that

- Mitcham's shopping parades are really important (include around Rowan Rd and Pollards Hill), and we welcome the recognition that post Covid-19 there is renewed appreciation for local shopping.
- Local parades should have a strengthened role.
- Improved public realm and improved crossings would help foster the use of local shopping parades.

We would like to see added that

- Strengthening local shopping parades should be seen as a support mechanism for fostering 20-minute neighbourhoods, an important post Covid policy consideration.
- Along with improved crossings and public realm we would add improved public transport links and waymarked walking and cycling links – but with the strong caveat that NO cycling link should remove green space. There are opportunities to make carriageway changes rather than remove the open spaces that are such a key characteristic of this part of the borough.

We disagree that

 Carte blanche exploitation of intensification opportunities, such as upward extension should be pursued. Upward extension of shopping parades is not, intrinsically and of itself, a way to 'strengthen' them, though it is clearly stated as such in the text. Upward extension can ruin the scale and massing of a shopping parade, doing real harm to the public realm. We ask that that definite statement is removed.

Reinforce the character of lower Mitcham and Cricket Green

We agree that

- The architecture and historic qualities of this area should be protected and new
 development should be of exceptional standard. Unfortunately this is not currently always
 the case, with new permissions having been given, including within the Conservation Area
 for substandard development that will bring harm to the area.
 - It should be noted that this is not always the case currently and Merton Council needs to work a lot harder on the quality, design and appropriateness of development with relation to place. We would welcome the strongest possible language being used in this context.

Strengthening edges and repairing sites along key corridors

We agree that

• Improvements to walking and cycling infrastructure and greening enhancements would make a positive contribution.

We would like to see added that

- The banning of lorries along Church Road and most particularly the narrow section from Benedict Wharf to Cricket Green should be pursued as a matter of urgency.
- The expansion of walking and cycling routes should not take place at the expense of any
 existing green including along road verges. The emphasis should instead be on roadway
 changes.

Research methods and aspirations of the consultation

Overall we find the Merton Character Study to lack depth and detail.

The neighbourhoods summary report presents information based on numbers of responses which are in some cases pitifully small. One neighbourhood returned zero responses. Of the 35 neighbourhoods for which responses are reported, 22 had 10 or fewer responses. See the table below for a count of responses by neighbourhood.

The aspiration for broad and wide consultation is expressed on p8 "Merton Council was very keen that this Character Study had an extensive programme of engagement to help test the emerging ideas and ensure that local residents were happy with the way their neighbourhoods were represented." The Covid-19 pandemic is presented as the reason for using online and digital tools only.

Yet we know from other work done in the borough relating to access to educational resources during the Covid-19 pandemic that significant numbers of individuals lack access to the internet. There was no reported effort to engage individuals without access to the internet in completing the survey, and no effort to take the survey to hard to reach communities or to flex into places people were at times able to use such as churches, supermarkets, and schools (while catering for children of essential workers). We understand the challenges presented by Covid-19, and recognise that they have been significant. However, we would have expected more effort to be made to rise to them, given that this document will have a shelf life to 2035.

At the current time of writing, as Covid-19 related restrictions begin to relax, there is potential for a further, broader, more inclusive consolation round, and we would urge Merton Council to take the opportunity.

Online public survey responses

Claimed total responses in draft Merton Character Study = 416

Actual total responses by neighbourhood = 415

There is no response recorded for the Wimbledon Park neighbourhood.

Neighbourhood	Number of
	responses
South Wimbledon	19
Colliers Wood	25
Haydons Road	12
Wimbledon Village	3
Wimbledon Town	46
Worple Road	7
Wimbledon Common	2
Wimbledon Chase	35
Ridgeway	5
Queens Road	20
Plough Lane	3
Parkside	1
Leopold Road	9
Durnsford Road	5
Grand Drive	9
Copse Hill	3
Motspur Park	2
Raynes Park	20

Neighbourhood	Number of
Neighbourhood	Nullibel Of
	responses
Shannon Corner	0
St Helier	10
Morden Park	8
Morden	9
Merton Park	32
Lower Morden	7
Canon Hill	25
Cricket Green	18
Eastfields	7
Figges Marsh	11
Mitcham Common	2
Streatham Road	13
Church Road	3
Pollards Hill	2
Mitcham	30
Rowan Road	6
Wandle / Mitcham Bridge	6