



SUTTON LINK
Response to public consultation
December 2018

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, Borough Character Studies, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. We have worked with the London Borough of Merton and our local councillors to produce the Cricket Green Charter which establishes our approach to development and change in the area and has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green (<http://mitchamcricketgreen.files.wordpress.com/2013/04/cricket-green-charter.pdf>). 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. Cricket Green has benefitted immensely from the opening of Croydon Tramlink (now London Trams) in 2000. We also celebrate Mitcham station as part of the Surrey Iron Railway – the oldest public railway in the world.

3. We are supportive of plans to improve public transport provision in the area and welcome the potential of Option 2 (Colliers Wood to Sutton town centre) among the different proposals for the Sutton Link. This has the highest transformative potential in terms of an area with relatively poor public transport accessibility and low prosperity. Much of the area through which the route would run in Cricket Green is in the lowest 20% of the Index of Multiple Deprivation.

4. Notwithstanding this support for the potential of Option 2 we have concerns over the proposals and the approach to public engagement and ask that further public engagement is undertaken before the principle of any option is established. This will require an additional step in the consultation process for considering the next stages.

5. A primary concern is that the exhibition boards and consultation material do not address the full implications of the proposals and lack necessary detail. We are troubled that no information has been provided on the stabling and maintenance facilities required to service the new route. This is despite, as we were informed at the public exhibition, some high level searches having been undertaken. It is inappropriate to seek views on the options by presenting only part of the picture. By knowingly presenting only partial information the legitimacy of the results is seriously undermined.

6. We are keen to see more detailed information on the proposed route of Option 2. The plans presented are too generalised to be able to assess their impact and the lack of detail on the route between Morden Road and Benedict Wharf is of particular concern. This section will require demolition of existing houses or offices and we understand this

General enquiries: info@mitchamcricketgreen.org.uk
Web site: www.mitchamcricketgreen.org.uk
Twitter: @MitchamCrktGrn

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

is also a likely site for storage and maintenance facilities if the Bus Rapid Transit option is taken.

7. In developing the next stage of the Sutton Link proposals it would be helpful to demonstrate how they integrate with the plans for the future of Benedict Wharf. A public exhibition on the change of use of this land from waste management to residential is underway at the same time as the Sutton Link consultation. Neither set of proposals addresses the other despite Option 2 running through Cappagh's site which is currently used as a car pound and is included in the emerging Local Plan allocation for Benedict Wharf. A new tram or bus rapid transit route would fundamentally affect its future development. A copy of our submission on the Benedict Wharf proposals is appended and it will be noted our aspirations for an "improved non-vehicular route" are closely aligned with the route of Option 2.

8. There are a number of other issues which we ask to be addressed in the next iteration of the plans:

- Confirmation that any crossing of the existing tramline near to Belgrave Walk will be at grade, avoiding the need for a visually intrusive over-bridge which would be visible from the Mitcham Cricket Green and Wandle Valley Conservation Areas and also be a source of noise pollution
- Addressing the social, environmental and economic impact on Mitcham in equivalent detail to that provided for Morden and the new terminus at Sutton. The options presented are constrained by assumptions about needing to demonstrate benefits for Sutton Town Centre and we would welcome further details and consideration being given to the Wimbledon to Mitcham option rejected at an earlier stage of the sift analysis
- Addressing the impact of either tram or bus rapid transit options on the existing road network in ways that support a transfer of trips from private vehicle to public transport and minimise impact on existing open space, street trees and green verges
- Acknowledgement of the close association of the Option 2 route to the Surrey Iron Railway as part of a wider historical interpretation strategy which also includes Mitcham tram stop



**FUTURE OF BENEDICT WHARF
Response to public exhibition
December 2018**

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, Borough Character Studies, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. We have worked with the London Borough of Merton and our local councillors to produce the Cricket Green Charter which establishes our approach to development and change in the area and has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green (<http://mitchamcricketgreen.files.wordpress.com/2013/04/cricket-green-charter.pdf>). 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. The Benedict Wharf site has long been a focus for our work. It is the largest previously developed site in our area and strategically located at a key gateway. Its use also has significant consequences for public access and links between Mitcham and Morden. We have campaigned for many years to reduce the impact of the site's current use on local amenity, including speaking in City Hall at the Mayor of London's call-in of earlier plans to intensify waste management uses. We have undertaken lorry surveys which demonstrate the major impact of the waste management facility on the historic section of Church Road in the Conservation Area. We are members of the Community Liaison Group.

3. We share the view that Benedict Wharf is a wholly inappropriate site for industrial uses with the impact of the current SUEZ facility. We welcome the plans to relocate to a more suitable location in Beddington Lane. Benedict Wharf is unsuitable for Strategic Industrial Land allocation and, given the future site in Beddington Lane has lain dormant for many years, we believe it entirely appropriate for this allocation to be removed to allow for much more appropriate residential development.

4. We have warmly welcomed SUEZ's initial approach to repurposing Benedict Wharf. Its public acknowledgment of the negative local impact of its operations combined with a commitment to secure a future legacy which local people and SUEZ would be proud of was refreshing and encouraging. We appreciated working closely with SUEZ in responding to Merton Council's call for sites and there is considerable alignment in our submissions. We are pleased that Merton Council's draft Local Plan agrees with our approach to a broad definition of the allocation to include the Cappagh site and land owned by Merton Council along Hallowfield Way.

5. We are concerned that SUEZ retains its commitment to securing its legacy in the quality of future development. The decision now only to seek outline planning consent is weaker than previous commitments and it will be important for any such consent to be sufficiently detailed that the quality of any future scheme can be secured. We were disturbed to hear SUEZ's Head of Planning say that her preferred option is for a simple

outline planning consent comprising a red line boundary and agreement to the principle of residential development. This is in marked contrast to the sentiment of all other conversations we have had with the SUEZ team and conflicts with the commitments made to the Community Liaison Group.

6. We have also welcomed SUEZ's commitment to effective community engagement in the development of options for repurposing the site. This included commitments to invite views through a site visit and walkabout and also to ensure community engagement experience was procured through the consultants appointed to develop the scheme. We have been disappointed by the lack of follow through on these commitments. We were unable to elicit any response to our repeated requests between March and November 2018 to discuss the approach. The current proposals involve no more than two basic public exhibitions prior to submission of a planning application. This falls well short of our discussions around an approach based on collaboration and co-design. We have experienced more community engagement than this for local schemes of a few houses and would expect a much more iterative and engaging approach for a scheme of 500-800 homes. We ask that an additional stage of community engagement is included in the programme. This should jointly consider the feedback on the proposals to date, consider the context, explore different development options and identify priorities for public benefit; informed by a site visit. A design charrette would be one way of achieving this and it would need to occur well before a final set of proposals was prepared ahead of a planning application.

7. We have reviewed the exhibition material and concept plan prepared for the site so far. This has much to commend it and there is alignment with many of the issues we have identified in our submission to the Local Plan (see Annex). Nevertheless there are significant omissions and some errors which need to be addressed and a number of significant opportunities have yet to be taken:

- A collaborative approach to the development of the whole site bounded by the Cappagh site, Merton Council's land along Hallowfield Way, La Sporta hall and the SUEZ site should be brought forward even if separate planning applications are submitted
- The opportunity for links through to Phipps Bridge tram stop and onward to Morden Hall Park should be identified as a key opportunity – this has the potential to have a transformational impact on the local area, noting that Mitcham Parish Church is closer to Morden Hall Park than Merton Civic Centre but the Benedict Wharf site currently presents both a psychological and physical barrier
- Future residential development should respect the character of Mitcham and be led by an urban design vision that emphasises the importance of streets and houses. It should be of a height that avoids visual intrusion, excessive shadowing and encroachment on London Road Playing Fields and negative impacts on views from the Conservation Area. We do not believe this can be achieved by the concept plan proposals which are excessively high and likely to lead to extensive development blocks and flats. The primacy of Mitcham Parish Church at the gateway to the Conservation Area should be respected and any development should be subordinate to this by virtue of its height and mass. Any development proposal should demonstrate how it responds to Merton Council's emerging [character study for Cricket Green](#) as well as the Conservation Area Appraisal and Management Plan. Visual and shadowing analyses are needed to inform the choice of approach
- Clear commitments are needed to the mix of housing to be provided, including a high proportion of affordable housing and provision for self/custom-build and development led by a community land trust. The site should not be built out by a single developer
- The interaction between the proposals and Transport for London's plans for a bus rapid transit (or tram) through the Cappagh site should be addressed

- Critical links across the centre of the SUEZ site which are identified in some of the exhibition material would not be possible in the proposed distribution of development across the site in the concept plan
- Commitments to improve the public realm of the Church Path cul de sac and remove lorry access rights should be given such that Church Path operates as an area where pedestrians and vehicles have equal priority
- The access between London Road Playing Fields and London Road, including between Fenning and Baron Courts and potentially through Taplow Court, is critical to the success of the scheme and not yet addressed
- More detailed future plans for London Road Playing Fields are needed which respect positive aspects of its existing character, including its tranquillity and wildlife value
- More detailed proposals for the future of Church Path and Baron Walk public rights of way are needed which respect their historic character and remove unnecessary fencing along their boundary with London Road Playing Fields
- More consideration should be given to highways and public realm improvements at the junction of Hallowfield Way and Church Road that recognise its role as a key gateway to Mitcham Cricket Green Conservation Area
- The route of the Surrey Iron Railway (the world's first public railway) and the medieval Ravensbury Path (omitted in the historical analysis) should be recognised in the scheme
- The proposals should include clear commitments to invest in nearby community facilities, such as Mitcham Parish Centre, and provide a community endowment
- The opportunity should be taken to rename London Road Playing Fields as Baron Fields
- The supporting material omits a number of nationally and locally listed buildings and structures, including the Lower Green West milestone and Bramcote Parade

Mitcham Cricket Green Community & Heritage

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



BENEDICT WHARF

Current uses – Waste transfer & processing (SUEZ), Car pound (Cappagh), Public open space (London Road Playing Fields), Highways (Hallowfield Way), Private open space (along Hallowfield Way (Merton Council) and Tram line (Transport for London)), Private hall (La Sporta)

Preferred future use – Residential (C3) & public open space, Community (D1) with ancillary retail (A1, A3) and employment (B1)

Existing planning & other issues – Strategic Industrial Location, Open Space, Site of Importance for Nature Conservation, Green Corridor, boundary of Mitcham Cricket Green & Wandle Valley Conservation Areas, setting of Grade 2* (Mitcham Parish Church) and Grade 2 (Vicarage) listed buildings, Locally listed buildings, Archaeological Priority Zone, Wandle Valley buffer, Overhead lines

Future opportunities – The most important development opportunity in Mitcham for the period of the Local Plan (see Site Opportunity Map and “From waste to place” [blog](#)) including:

- Significant social housing contribution
- Mixed housing delivery mechanisms, including community land trust
- Green corridor and public access link from London Road to Morden Hall Park via Benedict Wharf and Phipps Bridge
- Improved access to an invigorated London Road Playing Fields (renamed as Baron Fields) through Fenning & Baron Courts & from Church Path & Baron Walk
- Restore ancient Ravensbury Path between Church Road &

General enquiries: info@mitchamcricketgreen.org.uk

Web site: www.mitchamcricketgreen.org.uk

Twitter: @MitchamCrktGrn

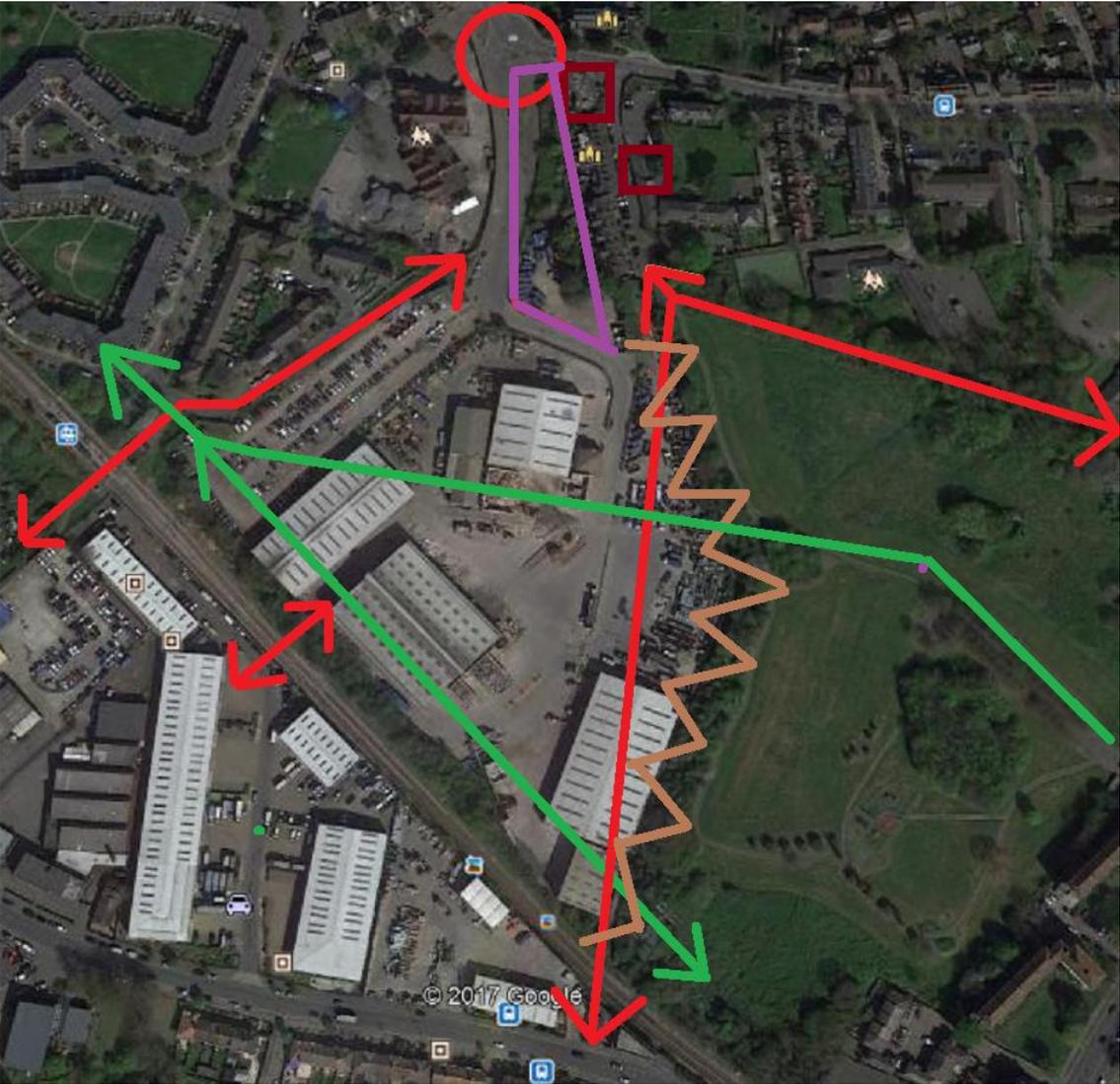
Registered Office c/o MVSC, Vestry Hall, 336/338 London Road, Mitcham, Surrey, CR4 3UD

Company registration no. 04659164 Charity registration no. 1106859

Ravensbury Park

- A gateway to Mitcham Cricket Green Conservation Area to be proud of by Mitcham Parish Church
- Development and public realm improvements along Hallowfield Way to reduce width and improve frontage
- Public realm investment in London Road Playing Fields, Church Path and Baron Walk
- New relationship and removed boundary between Benedict Wharf and London Road Playing Fields
- Recognise route of Surrey Iron Railway (first public railway in the world)
- Significant overall increase in area of public open space
- Investment in community infrastructure (e.g. repurposing La Sporta Hall & investment in Mitcham Parish Centre)

Benedict Wharf – Site Opportunity Map



-  Green corridor
-  Improved non-vehicular route
-  Porous boundary
-  Enhanced gateway
-  Community asset
-  Enhanced public realm & development