



STATEMENT OF COMMUNITY INVOLVEMENT

A submission by Mitcham Cricket Green Community & Heritage to London Borough of Merton

December 2019

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. 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 (<https://mitchamcricketgreen.org.uk/cricket-green-charter/>). 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 welcome this opportunity to inform a revised Statement of Community Involvement. There are growing expectations for deeper and earlier community engagement in the planning process and this is an area where a step change is needed in Merton Council's approach. Our experience as one of the Borough's most active community groups engaged in planning issues is of an approach to community involvement that rarely exceeds legal compliance and sometimes even falls short of this. This discourages community engagement, frustrates those who do engage, and ultimately results in less well informed and poorer planning outcomes. While we welcome recognition of the benefits of effective community engagement in paragraph 3.1 our experience is of a local authority which does not consistently follow this through into the way it manages the planning process.

3. A review of Merton's Statement of Community Involvement adopted in 2006 is long overdue. After 13 years it needs to reflect public expectations for earlier and better involvement in the planning decisions that affect their lives and their neighbourhoods.

4. At the most basic level current shortcomings include:

- a poor quality online management system for planning applications using an out of date version of Planning Explorer
- an inability to access planning applications and related information via an online map, as is the norm in other London boroughs
- inadequate and inconsistent neighbour notification

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- recently reduced opportunities for the public to speak at Planning Committee meetings for a local authority which prides itself on being one of the first to make this possible
- poor quality online information presented via a visually unappealing website that is hard to navigate, lacks use of Plain English and provides planning policies buried in multiple policy documents downloadable only as large files
- inadequate reporting mechanisms for enforcing planning controls and the lack of a public register of outstanding enforcement issues
- a failure consistently to abide by internal protocols for acknowledging and responding to emails on planning issues
- inconsistent approaches to the validation of planning applications submitted with inadequate information
- variable handling of documents provided online with significant amendments to planning applications and their supporting documents being made without any notification to those making representations
- an inconsistent approach to publicising “non-material amendments” to planning applications
- variable quality in the reporting of public representations made on planning applications in officer reports to Planning Committee
- a lack of coherent communications about the work programme and priorities for the future Merton, development management and enforcement teams
- inconsistent provision of pre-application advice and Design Review Panel reports on Planning Explorer
- inadequate transparency in the operation of the Design Review Panel, including in the recruitment of members, provision of information on meetings, participation of Planning Committee members, lack of public access to meetings involving Merton Council’s own development, convening of sub-groups without any publicity or public record and limited and inconsistent provision of reports
- recent withdrawal of citizen representations on planning applications from Planning Explorer and removal of information on closed planning applications, contrary to the practice of the majority of local planning authorities in both London and England
- a lack of engagement with the local community through well-established design tools and processes, including masterplanning and design codes for significant areas
- out of date and incomplete Conservation Area Appraisal and Management Plans which deny the opportunity for community engagement in their future
- incomplete coverage and completion of character studies across the borough
- a variable and inconsistent approach to community engagement in the development of the planning policy evidence base
- withdrawal of planning and design issues from the previous Heritage and Design Working Group
- a lack of any protocol for informing applicants seeking pre-application advice of the importance of engaging with identified local community groups, including Mitcham Cricket Green Community & Heritage.

5. We welcome the proposed Statement of Community Involvement for its description of the different elements of the planning process and summarising the legislative minimum requirements.

6. In finalising the Statement of Community Involvement we ask Merton Council to:

- clearly distinguish those areas where it is committed to going beyond the statutory minimum requirement for community involvement in planning issues
- address the issues identified in paragraph 4 above.