



**BENEDICT WHARF – revised draft outline application for 850 homes  
Application number 19/P2383  
February 2020**

1. We have reviewed the emerging plans for a major revision to the outline application for residential development on Benedict Wharf, increasing the quantum of development to 850 homes and the building heights to up to 10 storeys.

Lack of community consideration

2. We are dismayed at the manner in which these changes have been prepared. The serious concerns expressed by the local community in response to the outline proposals for 600 homes up to eight storeys have been absent from the discussions around changes to the original application. Our previous representations are available via our blog [here](#). This new application and the amended plans were announced by SUEZ at a Community Liaison Group meeting called at short notice and only a few days prior to their public 'drop in' sessions. It was fortunate we were able to attend this meeting, and not all community representatives who generally attend were present. Those who did not attend did not have an opportunity to see the plans before the 'drop in' sessions because they were not shared digitally beforehand. Despite a promise to share the plans digitally we had to prompt SUEZ to do so. This is all despite prior commitments to the local community that any major changes to the proposals would be informed by further design workshops. We were also informed by SUEZ that the two 'drop in' events were staged for information only, and it was made clear that community feedback would not result in any substantive changes. Feedback we heard from members of the public at the 'drop in' events was disparaging about the quality and relevance of the issues put forward in feedback forms for them to respond to SUEZ. SUEZ's stated commitment at the start of this process to securing its legacy in the quality of future development has been progressively diluted as the proposals have progressed and is now wholly discredited.

Lack of design led approach

3. The changes have been driven by an intervention by the Mayor of London which states that plans for 600 homes "*represent the sub-optimal development of the site*" and that "*the height and massing strategy must be revised to optimise the density*". It is believed that "*the generally unconstrained and isolated nature of the majority of the site and the immediate relatively open urban and landscape context to the east, south and west*" provides scope to increase both the number of homes and height of the development. GLA officers consider that the visual impact assessment further supports this increase. At no point in its 25 page intervention does the GLA address the legitimate views of local people and organisations. It appears to be taking on the role of

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local planning authority in holding out the potential for it to be the final decision maker on the plans but it is taking no responsibility for addressing community interests and concerns. This is unacceptable.

4. The GLA is also not following the approach required by the London Plan (intend to publish version) Policy D3 for optimising density through a design led approach – “*All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity....*” Insofar as a full range of design options has been considered, the scope for accommodating more homes in higher blocks than those put forward in the original outline application was rejected as an option in SUEZ’s own Community Design Workshops. We emphatically dispute the suggestion that the revised plans reflect a design led approach to the development of Benedict Wharf.

5. The recent report of the Building Better, Building Beautiful Commission concludes that:

**Neighbourhoods: create places not just houses.** Too much of what we build is the wrong development in the wrong place, either drive-to cul-de-sacs (on greenfield sites) or overly dense ‘small flats in big blocks’ (on brownfield sites). We need to develop more homes within mixed-use real places at ‘gentle density’, thereby creating streets, squares and blocks with clear backs and fronts. In many ways this is the most challenging of our tasks, which is to change the model of development from ‘building units’ to ‘making places’.

6. The Mayor’s intervention and SUEZ’s response provide a prime example of the problem. The plans give every impression of being a scheme designed to meet an externally driven housing requirement as a quid pro quo for repurposing Strategic Industrial Land. They do not represent an appropriate design and density response to the local context and community feedback. We believe the resulting development will feel placeless and not part of Mitcham. It will also cause harm to significant heritage and other assets. We have presented alternative proposals for mixed-use gentle density and these have been ignored. The development at Benedict Wharf 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, shadowing and encroachment on London Road Playing Fields and negative impacts on views from the two adjacent Conservation Areas. The quality of the scheme should be such that there is public pressure to include the whole site within a Conservation Area within 10 years. This would mark a fitting transformation of Benedict Wharf with its long history of “bad neighbour” uses and provide the positive legacy which SUEZ states it wants to leave for the site.

7. The gulf between the imposed views of the Mayor of London and those of the local community are well illustrated by the continuing belief that even the 600 homes development has a “*beneficial impact*” on the townscape and that the buildings do “*not appear overly dominant*”. We have yet to meet anyone who lives or works in the area who sees anything but significant harm in what is planned. Visual intrusion is clearly apparent in the illustration below, which is based on the initial scheme without the addition of extra height and a 42% increase in the number of homes. An increase in height and density must, by its very nature, have a greater impact than that of the previous already unacceptable scheme.



### Re-opening whether Benedict Wharf should be for residential or strategic industrial use

8. There is real concern now that the proposals have crossed a line which places a question over our support for residential use of this Strategic Industrial Land. We are dismayed to have reached this position, having done everything we can to work in collaboration with the landowner, SUEZ, and Merton Council, including working closely with them to jointly agree a site allocation in the emerging Local Plan. These efforts have since been rebuffed and this cannot be without consequences.

9. The outline planning application for Benedict Wharf has come forward ahead of the Local Plan and we now consider it to be premature. We wish to review alternative land uses for the site as part of the Local Plan process, including for strategic industrial use. It may be that with appropriate controls over hours of working and lorry routes, such that they avoid Church Road through Mitcham Cricket Green Conservation Area, an industrial use will be more appropriate than a massive overdevelopment of the site for housing. We ask Merton Council and the Mayor of London to consider the plans premature and address these alternatives through the Local Plan review. Benedict Wharf is also key to unlocking a much more significant development opportunity that embraces the Cappagh Site, Merton Council's land along Hallowfield Way, Worsfold House and La Sporta. It is also adjacent to a potential tram extension or bus rapid transit route. It is now clear that these issues need to be resolved together and through the Local Plan. We stand ready to contribute.

### Other considerations

10. We have reviewed the drawings provided for an amended outline application for 850 homes up to 10 storeys and, notwithstanding questions of principle over whether residential use of this scale is appropriate and whether it should be considered prior to the Local Plan review, we believe the following issues will need to be addressed before an amended application can be submitted:

Design Code - Provision of a binding and much more detailed design code is required. As a minimum it should lock in any future developer to the minimum design and quality standards of the outline application and provide further detail over home typologies, avoidance of single aspect dwellings, quality and maturity of planting, and use of meaningful character areas which resonate with Mitcham. The design code needs to be emphatic in its wording and capable of enforcement by Merton Council. We expect the

community to be involved in its preparation. The existing proposed design code is too weak. Following it is simply "*strongly encouraged*" and it is dependent on Merton Council having the capability to "*test and review proposals for Benedict Wharf from inception to delivery*". Our comments on the design code resonate strongly with those expressed by the Design Review Panel when it considered this scheme on 20<sup>th</sup> January 2020.

Community investment - Provision of a binding community investment package to address the impacts of such a major development – an existing model is provided by The Collective for its development by Trewint Street bridge in Earlsfield for a smaller scheme providing fewer than 300 co-living spaces. We have been dismayed to find that SUEZ has not even looked at this approach despite our raising it over six months ago. It is, therefore, attached in the hope that it will now be considered and the approach adopted. SUEZ has also said there have been no discussions with Merton Council about investment in local community facilities. This is a major omission by both parties given that the Benedict Wharf plans make no provision for on-site community facilities. We agree that this infrastructure is best provided from existing community facilities and providers. Existing community infrastructure therefore needs committed investment if it is not to carry an unfair burden in addressing demands generated by the scheme. We have identified the following community investment priorities which should be required to be provided in tandem with construction as a minimum:

- A management plan and endowment for London Road Playing Fields (an endowment was required by the Mayor of London from SITA (as SUEZ was previously known) upon completion of the unimplemented plans for more intensive waste management on the site, so a precedent has been set)
- New and enhanced routes:
  - through Phipps Bridge to Morden Hall Park
  - from London Road between Baron and Fenning Courts
- Major improvements to Mitcham Parish Centre and Mitcham Parish Church as community facilities supported by a community endowment
- Enhancements to Ravensbury Path, Church Path and Baron Walk which also respect their character as historic pedestrian routes
- A long term solution to the future of the La Sporta building which brings it into positive community use
- Enhancements to the tram and 200 bus which are already beyond capacity at peak times.

Protection of Church Path - Detailed measures which will ensure that cyclists and pedestrians entering and leaving the site will use Hollowfield Way and not Church Path as the main route – this will require physical barriers preventing use of Church Path other than in an emergency and positive interventions to make Hollowfield Way the natural route of choice, including amendments to the current roundabout and junction with Church Road.

Delivery of through routes - Provision of binding plans that secure new pedestrian and cycling routes linking Mitcham to Ravensbury Park, the Wandle, Morden Hall Park and Morden (including through the Phipps Bridge green spaces) and to provide direct access to London Road through Clarion Housing land at Baron and Fenning Courts - indicative proposals are wholly insufficient and there needs to be absolute confidence in their delivery, including public support from Clarion Housing.

London Road Playing Fields - Provision of detailed plans for the consequential investment in London Road Playing Fields which is informed by a character and ecological assessment and which secures its open and tranquil character, enhances its wildlife value, provides improved and less intrusive play facilities, removes boundary fencing, opens up more access points, avoids additional lighting, provides more appropriate footpath surfaces and results in no net increase in the area covered by footpaths and other hard landscape. We are dismayed at the constant referral by SUEZ's architects to London Road Playing Fields as a 'park'. London Road Playing Fields are emphatically not

a park and their essential character must be retained. We have previously proposed renaming the area as Baron Fields which is both more appropriate and historically resonant.

Baron Walk - A major rethink of plans to increase the width of Baron Walk to an extraordinary 9m which will remove any sense of the character of this historic route and invite abuse by cars, motorbikes and other users – Baron Walk should be no greater than 3m wide and be designed for its sense of place and not to meet engineering standards. Any changes need to be informed by a proper assessment of the character and historic significance of the route. We believe Baron Walk should not be the major through route for cyclists and pedestrians and this should be provided within and through the new development.

Assessment of visual impact - Revised proposals should be accompanied by honest assessments of their visual impact and drawings which show the new development as it will be seen. Misleading wireframe images through which clouds and sky are visible and bogus assessments claiming beneficial impacts which defy common sense will not be acceptable. The proposed 10-storey block facing London Road Playing Fields is particularly egregious and should be lowered.

11. We conclude by asking SUEZ to withdraw the plans given the scale and impact of the development now required to respond to the Mayor of London's requirements. The future of Benedict Wharf should be considered alongside adjacent sites as part of the Local Plan review and include consideration of future strategic industrial use.