



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

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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*”