



**NEW MERTON LOCAL PLAN – Public Examination
MATTER 13 – tall buildings**

**Submission from Mitcham Cricket Green Community & Heritage
May 2022**

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 and its evidence base and we made detailed representations in September 2021, January 2021, January 2019 and January 2018 on Merton Council's call for sites at Stage 1 of the Local Plan review; the draft Plan for consultation at Stage 2 and Stage 2a; and the submitted Plan at Stage 3.
2. This submission confirms our wish to participate in the Examination's hearing session on Matter 13.
3. Our representations address some of the Questions raised for discussion. We have direct experience of the treatment of tall buildings through site allocations – on Benedict Wharf (site Mi1) (10 storeys – outline consent) and Mitcham Gasworks (site Mi16) (varying treatment in draft Local Plan and developer proposals).

Mitcham Gasworks

4. We do not support provision for tall buildings on Mitcham Gasworks for the reasons cited in our representations and separate submission. It is an inappropriate, low rise, location where tall buildings have no precedent and it would have a significant adverse impact on the townscape and local character. There is no evidence provided during the Plan's preparation that the approach is *"based on local context and grounded in an understanding and evaluation of [the] area's defining characteristics."* Indeed, earlier iterations of the Plan lack clarity by referencing *"taller"* buildings, begging the question *"taller than what?"*. We believe this is best clarified by removing any reference to either *"tall"* or *"taller"* buildings and not by the addition of *"up to 9 storeys"*. The late change lacks any evidence as to how a decision to limit heights to *"9 storeys"* has been judged appropriate. The site allocation should specify building shall not exceed six storeys.
5. The Borough Character Study for Mitcham does not provide the necessary evidence. It is deeply flawed for reasons developed in our original response to the draft – accessible [here](#) and with an extract below:

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"We do not support the overly simplistic categorisation on page 39 of the different neighbourhoods into a spectrum ranging from areas to be re-imagined to those for repair. The management of change throughout the Borough requires a much more nuanced approach. The approach also has a development focus and fails to address many of the considerations identified elsewhere in the study as contributing to local character. As a diagnostic tool we anticipate it will be regularly abused and that it will be used to justify development antipathetic to Merton's rich and diverse character. This is readily illustrated by the categorisation of both Mitcham and Church Road as areas to be reimagined. We recognise there are reimagination opportunities within them, including Benedict Wharf, Phipps Bridge and Sibthorpe Road car park, but the majority of both character areas demands a much more sensitive approach that strengthens and re-enforces existing character."

6. We would consider application of the Character Study to justify tall buildings on Mitcham Gasworks as an early example of the abuse we anticipated in commenting on the draft Study.

Benedict Wharf

7. We do not support provision for tall buildings on Benedict Wharf, notwithstanding the outline planning consent. These issues were addressed in our detailed representation at each and every stage of this planning application and in the community design workshops we initiated with Suez. The latter rejected tall buildings as an option and all the evidence we reviewed during consideration of the planning application, including a deeply flawed Heritage, Townscape and Visual Impact Assessment, supported this view. Community preferences have been ignored. Our analysis was supported by an independent review commissioned from Create Streets. Full details of these representations are available [here](#). The Local Plan can still influence the future development of the site and the details of the development which comes forward and we seek modifications which address our earlier representations and the recommendations made by Create Streets.

8. Beyond being general consultees on the Local Plan we are not aware of any arrangement for consulting with neighbouring boroughs on the proposals for tall buildings despite their visual impact.