



**NEW MERTON LOCAL PLAN – Public Examination
MATTER 2 – plan period; “succinct, clearly written and unambiguous” &
Vision**

**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 2.
3. Our representations address many of the Questions raised for discussion. Our views on the most relevant issues are as follows:

Plan period

4. We have highlighted the Plan’s failure to meet the NPPF’s requirement for “a *minimum 15 year period from adoption*” at all stages of the consultation process. It is welcome that Merton Council finally acknowledges the issue but we do not believe the proposal to amend the Plan period to 2022/23 to 2036/37 is adequate for the following reasons:

- It still provides for only a 14 year plan period not a minimum 15 years
- There is a high risk that the Plan will not be adopted before the end of March 2023 on the basis of previous experience and overambitious timescales (e.g. Merton Council’s Borough Plan Advisory Committee in September 2018 was informed the Plan would be submitted in mid-2019 for adoption in 2020)
- Inadequate consideration has been given to the implications of an extended Plan period for the evidence base and Sustainability Appraisal where Merton Council’s conclusion that it “*covers any necessary extension to the plan period*” is contestable (e.g. on evidence of much more rapid climate change and air pollution impacts and on basis that important parts of the evidence base are already dated)

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"succinct, clearly written and unambiguous"

5. The Examination has already put a helpful focus on the Plan's lack of clarity and we raised this issue and its root causes repeatedly during the consultation process since January 2019. The failure of Merton Council to make changes to the Plan and to repeat basic errors in subsequent drafts fundamentally undermines public trust in the process. We know a number of organisations opted out of further engagement in the consultation process due to a lack of responsiveness to their representations and the poor quality and opaqueness of both the Plan and the process. Some of these have now found themselves unable to be represented during the Examination. It is welcome that these issues are starting to be addressed but we believe Merton Council's response to the Examiner's "initial findings" is too limited and inadequate.

6. We continue to urge action in the following areas:

- *Contents* – the latest consolidated Plan still lacks any Contents despite this being an issue now also highlighted by the Examiners
- *Policy presentation* – the latest consolidated Plan still lacks any visual means of distinguishing between the Plan's policies and the supporting text despite this being an issue now also highlighted by the Examiners. We are familiar with other Local Plan using tinted boxes and a different font to provide the necessary clarity
- *Structure* – there is a lack of integration across the Plan and different sections are presented in different ways and written in different styles. The whole Plan needs a strong editor to bring much needed coherence. The consequences extend to the presentation of key policy issues and we flagged a number of concerns in our earlier representations. The combination of Area and Thematic based policies results in some inconsistencies, especially in relation to policies for the economy and town centres where detailed locations relevant to the area based policies appear instead thematically
- *Navigation* – The Plan is inconsistent in the titles and numbering of tables, figures and diagrams and many lack titles and numbers. There is no single list of the figures, tables and diagrams in the Plan proved as part of a Contents

Vision and Spatial Strategy

7. We identify the following issues on which the Plan fails to be effective and meet the need for a positively prepared, clear and justified vision:

- *Evidence Base* – the bulk of this was unavailable during public consultation on the Plan and much of what has been provided is dated and/or of a low quality. Our earlier submissions identified particular weaknesses in the Merton Character Study, Smalls Sites Toolkit and Open Spaces Study. The Plan's mischaracterisation of Mitcham Village is exacerbated by the lack of an up to date retail study showing the diversity of uses, the significant number of independent retail businesses and the relatively low vacancy rates. National award winning evidence, such as the work on Wandle Vistas, has simply been ignored in developing policy
- *Spatial Vision* – we find much to welcome in the Spatial Vision but have very low confidence in the ability to deliver it within the Plan period. One example is the failure to include any specific measures which will deliver the welcome ambition to reduce disparities between the east and west of the Borough. The Spatial Vision is unbalanced by the omission of any reference to protecting and enhancing Merton's green spaces, wildlife and heritage assets. This is contrary to national policy and conflicts with the conclusions of Merton's largest ever survey of public opinion undertaken in 2021 which concluded that "*Green spaces are the most valued aspect of life in Merton*" (see [Engaging Merton](#))

- *Monitoring* – We welcome the measures to improve monitoring proposed in the Main Modifications but do not consider them to be adequate. We identify significant areas of weaknesses or omissions in our representations relating to heritage assets, sustainability, open space, design and tree cover. As a minimum the monitoring of these issues should include all heritage assets; address the location/type/environmental performance of new development; include loss of open space to educational uses; address delivery of and against design codes across the Borough’s character areas; and use i-Tree Canopy as a monitoring tool. Biodiversity monitoring should be against the intention of securing a net gain over the Plan period (which is recognised in relation to Open Space but not Biodiversity) and look beyond designated areas. Given announced changes to national policy we do not support demonstration of a 5-year housing land supply as a “*key indicator*”.