



**NEW MERTON LOCAL PLAN – Public Examination
MATTER 7 – supply and mix of housing sites**

**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 7.

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

Benedict Wharf (site allocation Mi1)

4. The Benedict Wharf site has long been a focus for our work. It is the largest previously developed site in the neighbourhood and strategically located at a key gateway to Mitcham Cricket Green Conservation Area. We are members of the Community Liaison Group for Suez's operations and have worked for many years for a successful conclusion to the redevelopment plans. We spoke at the Mayor of London's Representation Hearing following which outline planning permission was granted for 850 homes rising to 10 storeys. We support the principle of redeveloping the site for housing but object strongly to the plans while recognising they now have outline permission.

5. We welcome the belated recognition that completion of the building plans will be much later in the Plan period. There is a high degree of uncertainty over delivery of the scheme, including as a result of a proposed merger of Suez and Veolia which is currently under investigation by the [Competitions and Markets Authority](#). Our own conversations with the prospective developer, London Square, confirm the likelihood of significant delays.

6. We support the site allocation being wider than Suez's land ownership and the area granted outline permission. This stems from early engagement between Suez and us that recognise the opportunities for wider integration with neighbouring land (see below) and a reimagining of the function and design of Hallowfield Way. We believe this

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will be facilitated by a more strategic view being taken by the Local Plan not constrained by land ownership. We think the site allocation should be further extended to include the Cappagh land to the north west (Lambeth car pound) as well as Hollowfield Way and the small areas of land along it in Merton Council's ownership (where there has been a land swap as part of the planning application process for Benedict Wharf).

1. Benedict Wharf



Current uses – Waste transfer & processing (SUEZ), Car pound (Cappagh), Public open space (London Road Playing Fields), Highways (Hollowfield Way), Private open space (along Hollowfield Way (Merton Council) and Tram line (Transport for London)), Private hall (La Sporta)

Preferred future use – Residential (C3) & public open space, Community (D1) with ancillary retail (A1, A3) and employment (B1)

Existing planning & other issues – Strategic Industrial Location, Open Space, Site of Importance for Nature Conservation, Green Corridor, boundary of Mitcham Cricket Green & Wandle Valley Conservation Areas, setting of Grade 2* listed building (Mitcham Parish Church), Archaeological Priority Zone, Wandle Valley buffer, Overhead power lines

Future opportunities – The most important development opportunity in Mitcham for the period of the Local Plan (see Site Opportunity Map and [blog](#)) including:

- Significant social housing contribution
- Mixed housing delivery, including community land trust
- Green corridor and public access link from London Road to Morden Hall Park via Benedict Wharf and Phipps Bridge
- Improved access to an invigorated London Road Playing Fields (renamed as Baron Fields) through Fenning & Baron Courts, Church Path & Baron Walk
- Restoration of ancient Ravensbury Path between Church Road and Ravensbury Park
- A gateway to Mitcham Cricket Green Conservation Area to be proud of
- Development and public realm improvements along Hollowfield Way to reduce width and improve frontage
- Public realm investment in London Road Playing Fields, Church Path and Baron Walk
- New relationship and removed boundary between Benedict Wharf and London Road Playing Fields
- Recognise route of Surrey Iron Railway (first public railway in the world)
- Significant overall increase in area of public open space
- Investment in community infrastructure (e.g. repurposing La Sporta Hall & investment in Mitcham Parish Centre)

Former Merantun Development sites (site allocations Mi4, Mi5, Mi11 plus Mo2)

7. We do not consider these allocations to be sound. They are based on now undeliverable extant planning permissions granted by Merton Council to its own development company. Merantun Development Ltd has subsequently been wound up and Merton Council has announced an intention to sell the sites.

8. The planning permissions are not deliverable by the private sector because:
- they are dependent on affordable housing being provided on only one of the sites (Mi11) which is not policy compliant
 - Merton Council has announced that *“the sites formerly owned by the Merantun Local Authority Property Company would be the first tranche [sic] of sites to be disposed of and to seek to achieve 100% affordable housing on these sites”* (Merton Council Cabinet Minutes, 6 December 2021) and this is not consistent with the extant planning permissions where the large majority of dwellings are for market sale (including all those on The Canons nursery and Raleigh Garden car park)
 - Merantun's closure is evidence the development across these four sites is not viable as consented

Mitcham Gasworks (site allocation Mi16)

9. We support the principle of residential development on the site and the site allocation should also make provision for local retail and community uses. We support a capacity of 200-400 dwellings as allocated. No evidence has been provided supporting the reference to a capacity for 450 dwellings in the latest site estimates provided by Merton Council.

10. The adverse implications of accommodating any significant increase in this capacity has been demonstrated by the emerging proposals from St William Homes comprising 17 tower blocks next to Mitcham's village centre, rising to 13 storeys. We regret the recent demolition of the locally listed gasholder which needs to be reflected in an updated site allocation.

11. The site allocation should be clear this is not a location where Merton Council will permit tall buildings over six storeys and any development should respect the existing character, heritage and townscape. We do not support the proposed Main Modifications to increase the height of buildings to 9 storeys and delete reference to the importance of respecting existing character, heritage and townscape.

12. We prepared the following [briefing](#) in January 2022 of our expectations for the site which underpins these representations:

**MITCHAM GASWORKS
SITE EXPECTATIONS
January 2022**

Mitcham Gasworks is identified in Merton's draft Local Plan as a site for significant residential development (site Mi16). This note sets out the expectations of Mitcham Cricket Green Community & Heritage, a local civic society, for future development of the site.

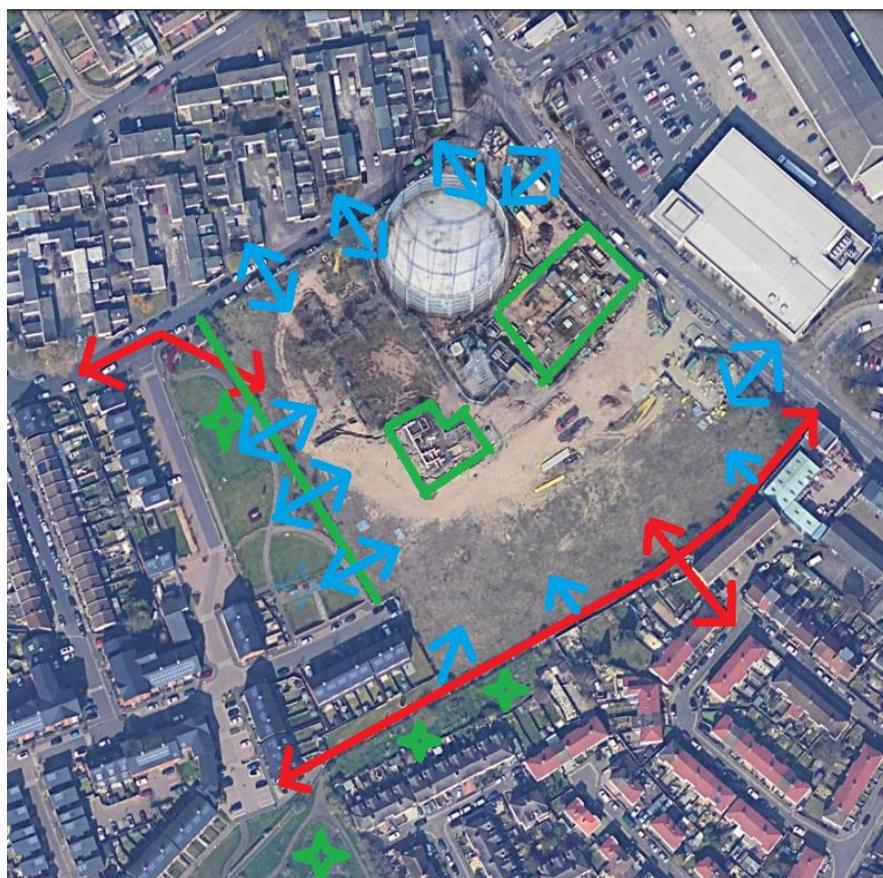
- 1. Design approach** – the development should be conceived as a street-based natural extension of Mitcham, providing a mix of residential types (including houses) in buildings that recognise the village character of the adjacent centre and respect existing nearby building heights, character and materiality. The capacity of the site is within the range of 200-400 homes specified in the draft Local Plan and it is not identified as suitable for tall buildings of six stories or more.
- 2. Western gasworks site** – the development should complete and complement the earlier development of the western part of the Gasworks site. This includes extending Brickfield Road, making links to Fox's Path and providing strong ecological, hydrological and landscape integration with the contoured open space east of Hay Drive. The design of the site should acknowledge its 150 year history as a gasworks.
- 3. Site use** – the site should be predominantly residential with provision for community uses, including community event/meeting space managed by the local community. There is a shortage of play space in the surrounding area and play should be integrated across the scheme.
- 4. Permeability** – the site boundary should be fully permeable and an enhanced route for cyclists and pedestrians along Portland Road and Lewis Road to Church Road should be provided. There should be no vehicle route through the site.
- 5. Field Gate Lane** – significant widening and improvements to Field Gate Lane and its boundaries should be provided making it suitable as a green route for both pedestrians and cyclists while also respecting its character as an historic route and avoiding engineering to highway standards. Access through to Pear Tree Close/Westfield Road should be integrated into the changes.
- 6. Boundaries** – sensitive, green boundaries should be provided where required around the site and around each of the two remaining Pressure Reduction Stations.
- 7. Affordable homes** – there should be a minimum of 50% affordable homes with the majority provided for social rent.
- 8. Single aspect homes** – no single aspect homes should be included –there are no overriding design constraints that mean all homes cannot be at least dual aspect as required by the London Plan.
- 9. Greening** – the site should become an exemplar for achieving ecological gain,

significantly exceed the minimum Urban Greening Factor and contribute to tackling the climate emergency in its construction and energy use.

10. Archaeological investigation – this is a prime area of archaeological interest, including significant finds during the original development of the gasworks and archaeological studies indicating the possibility of a Roman well on site. A full site investigation should be completed prior to any development or further site clearance. Any significant results should be interpreted and integrated into the scheme’s design.

11. Community Investment – development proposals should be accompanied by a Community Investment Programme secured through a s106 obligation, including benefits for Miles Road Playing Fields, Mitcham Community Orchard, Abbeyfield Close Recreation Area and Mitcham Parish Centre.

12. Design process – this should reflect national planning policy favouring close working with the local community and use of creative design tools (NPPF, paragraphs 1132, 133) - a community-led design charrette is preferred resulting in an outline masterplan. A public exhibition of a single option for development of the site which has only received external input via Merton Council’s Design Review Panel will not be considered an acceptable process.



Improved routes – RED ARROWS
Permeable boundary – BLUE ARROWS
Sensitive boundary – GREEN LINES
Greening opportunities – GREEN STARS

Wilson Hospital (site allocation Mi8)

13. We have been heavily involved in the proposals for investment in the Wilson Hospital as a new “health and well-being centre” for more than a decade. We support this use and there is recent evidence of the Clinical Commissioning Group moving the process forward after a recent Options Appraisal exercise.

14. We have seen no evidence supporting either the need for residential development as enabling development on the site or that it has appropriate capacity for 39 dwellings. We would support a small amount of residential development and there is precedent in an expired planning consent along the frontage with Caesars Walk. We prepared a [Community Planning and Design Brief](#) for the site in 2016 which remains extant.

15. We do not understand the rationale for the delivery of new dwellings on Birches Close (site allocation Mi2) ahead the Wilson as is now proposed in the Main Modifications. Development at the Wilson is likely to be dependent on some services being decanted and delivered at the Birches during the building process.

Worsfold House (site allocation Mi19)

16. There have been no local discussions about the future of Worsfold House. This increases the risk of the site not being delivered. The site has a history of uncertainty. Merton Council announced disposal of Worsfold House to Clarion Homes to build 60 dwellings in July 2019. This did not proceed although the suspension of the sale was only confirmed following a Freedom of Information request. We support the allocation of Worsfold House for development but have no evidence to support an indicative capacity for 60 dwellings. We consider delivery in 2025/26 to be overly ambitious.