



MITCHAM SOCIETY

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19/P2383 Benedict Wharf

Mitcham Society Comments April 2020

OUTLINE PLANNING APPLICATION (WITH ALL MATTERS RESERVED) FOR THE REDEVELOPMENT OF THE SITE COMPRISING DEMOLITION OF EXISTING BUILDINGS AND DEVELOPMENT OF UP TO 850 NEW RESIDENTIAL DWELLINGS (CLASS C3 USE) AND UP TO 750 SQM OF FLEXIBLE COMMERCIAL FLOORSPACE (CLASS A1-A3, D1 AND D2 USE) TOGETHER WITH ASSOCIATED CAR PARKING, CYCLE PARKING, LANDSCAPING AND INFRASTRUCTURE

Mitcham Society has considered the proposals for the above development and has the following comments.

- 1) Mitcham Society has seen this proposal develop at close quarters from its inception. We have been part of the SUEZ Community Liaison Group since it was set up in 2012, and were present when SUEZ first announced its intention to leave Benedict Wharf, and to see the site developed for housing.
- 2) We supported the work done by Mitcham Cricket Green Community & Heritage in developing its contribution to the Merton Local Plan relating this site, which was discussed in SUEZ Community Liaison Group meetings and which was a key element of community support in designating the land for housing.
- 3) Sadly, during the development of this proposal from its earlier incarnation of 600 homes to the current proposal for 850 homes we have seen a systematic and wilful withdrawal of SUEZ from the local community. The current plans were shown to a Community Liaison Group meeting on January 13th 2020 - just days before they were to be shown at two public events. They were shown for information purposes only. The Community Liaison Group, which should have been a trusted sounding board, was entirely blocked from making any input.
- 4) When first bringing plans forward SUEZ said its aspiration was to leave a lasting legacy. If SUEZ wants its legacy to be one of foisting overdevelopment on a site which can not accommodate it, and ignoring the potential to participate in a wider regeneration, then if these plans are approved it will have achieved its goal.



5) The current proposals are for a number of homes that the site can not accommodate. At heights of up to 10 storeys, and with a density and design which is completely alien to the surrounding area, the plans are entirely inappropriate. SUEZ has submitted documents which show wireframes of the development, saying that their level of intrusion is undamaging. We completely disagree and we fail to understand how any impartial observer could agree. For example two views are shown below, with the SUEZ wireframes filled in with blue, and SUEZ's comment on the effect of these on the surroundings quoted. We fail to see how SUEZ's words match the reality:



Effect on Church Path - claims by SUEZ

““moderate and neutral effect”



Effect on London Road Playing Fields – claims by SUEZ

- “moderate and beneficial effect”

- “will not appear overly dominant”

6) SUEZ staged two public events on 24th and 25th January 2020 at which it showed drawings of its plans. As mentioned earlier, these were shown at the Community Liaison Meeting on 13th January. We quizzed SUEZ at some length at the Community Liaison Group meeting to clarify the nature of these public events and it was clearly stated that they were for information only. They were not consultations. Yet SUEZ provided feedback forms, and has chosen to submit a consultation feedback report (online as 19P2383 Consultation Feedback Report Feb 2020.pdf). How is it legitimate to submit a consultation report of an event which was not a consultation? This report contains cherry picked comments from feedback forms. It does not resonate with the tone of the meeting we attended, at which people were variously shocked at the increased density and visual intrusion. We discussed the plans with numerous attendants who made comments in their feedback which have been selectively ignored in the ‘consultation’ report.

This report should be expunged from the submitted documents as entirely invalid and discredited.

- 7) We have read the detailed submission of Mitcham Cricket Green Community & Heritage and agree wholeheartedly with their aspiration for a wider, more strategic approach to this site, bringing in other areas of land which together provide an opportunity for much needed estate regeneration and provision of at least the same number of new homes as exist now, while taking a more respectful and thoughtful design approach much more fitting to the neighbourhood. We endorse MCGC&H's proposals and echo their request that Merton Council and the London Mayor consider these plans premature, and pause pending consideration of a broader estate renewal programme which could bring wider benefits in terms of homes and development which is much more fitting to the local area.
- 8) We are extremely concerned that, as an outline planning application, there is much leeway for whoever might build out this site to alter any ideas it presents. During Community Liaison Group meetings we argued strongly for a Design Code to accompany the application, and eventually SUEZ agreed and produced one. Sadly the Design Code which has been submitted is weak in many key areas, and it lacks the force that would be needed to ensure it would be adhered to. It does not provide Merton Council's planning team with enough clarity for them to implement it with future developers. We draw your attention to Merton Council's own [Design Review Panel minutes of 30th January 2020](#) – *"Much of the discussion concerned issues that needed to be covered in the design code....."* and later, following reportage of a wide-ranging discussion, *"All the issues raised by the Panel need to be incorporated in some way into the design code"*
- 9) The applicant may draw on the fact that the Design Review Panel gave this proposal an AMBER rating. For a proposal of this scale AMBER is simply not good enough. We were present at the Design Review Panel meeting and heard one member argue for a RED rating on various significant grounds. We also heard concerns raised about a number of matters including: the presence of single aspect dwellings in the design as it sits, and a lack of emphatic discounting of these in the Design Code; and the lack of care and attention to the one route into the site – Hallowfield Way as well as lack of care and protection for the quiet Church Path which could inevitably become an informal access route for many people arriving and leaving on foot or cycle/motorcycle if not adequately treated at the design phase and protected emphatically in the Design Code. These comments and many others speak to the lack of a strong Design Code, lack of key issues being thought through, and the fact that even as an outline planning application this is woefully inadequate.
- 10) We are unable to support the current plans, and now even question whether this land is best used for housing. The proposal is not of sufficient design quality for this part of Mitcham, and is entirely inappropriate for the surroundings. It would dominate the landscape, a factor which SUEZ has attempted to hide through words, but which images such as those shared in this representation make abundantly clear. It is a significant overdevelopment of the site. The plans ignore significant gains that could be made through a broader estate regeneration scheme, and to not examine this opportunity would be to wilfully ignore the potential for a larger, more

sympathetic scheme which would enhance existing neighbourhoods to the benefit of Mitcham as a whole. The Design Code is entirely inadequate and needs to be revisited and rewritten to take a much more robust stance.

Permission should be refused.