



**MITCHAM SOCIETY**

Web: [www.mitchamsociety.org.uk](http://www.mitchamsociety.org.uk)  
Email: [TheMitchamSociety@gmail.com](mailto:TheMitchamSociety@gmail.com)  
Twitter: @MitchamSociety

## **Merton Local Plan Stage 2a**

### **Mitcham Society comments**

**January 2021**

Mitcham Society has commented on the previous two rounds of the Local Plan preparation, and now presents its comments on the latest consultation.

Before we discuss matters relating to discrete chapters including the Mitcham policy and justification and the Mitcham site allocations, we present some overarching comments.

#### **Mitcham – a 21<sup>st</sup> Century Village**

As we have noted in previous submissions, Mitcham is a 21<sup>st</sup> Century village at its heart. Its central focus is what remains of Fair Green, extending to Figges Marsh, Three Kings pond and Piece, and onwards to The Canons, Cricket Green and its various greens, and Mitcham Common. Mitcham Village has a clear physical identity and function that reflects its heritage and speaks to its role as a 21<sup>st</sup> century village.

Mitcham Village is under increasing development pressure, and it is vital that its village character is recognised, celebrated and supported in the Local Plan if it is not to become overwhelmed by development that is detrimental to its character and causes it to become a bland ‘anyplace’.

Ours is not a nostalgic view. We are clear that our aspiration is for a 21<sup>st</sup> Century village which reflects the diverse and vibrant communities and cultures that make up the population of Mitcham, and sits well with the aspiration of the Local Plan to deliver 20 minute neighbourhoods.

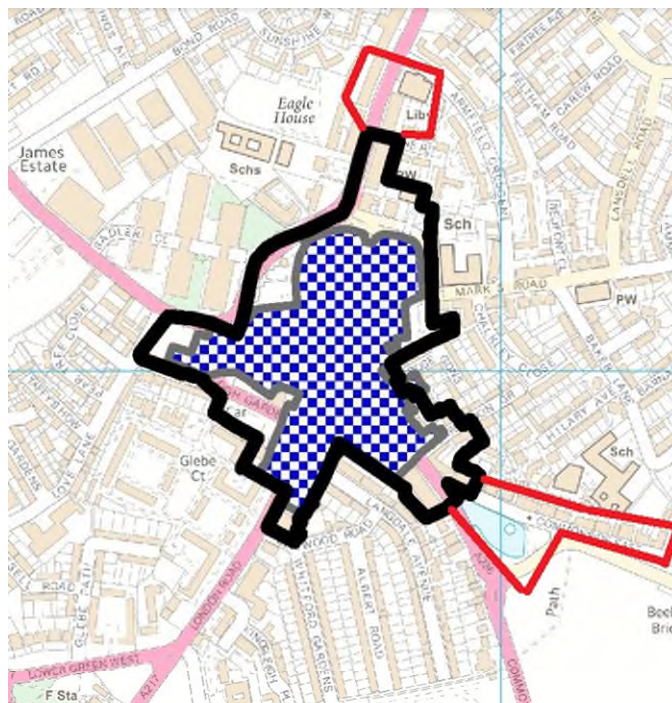
Mitcham Village today provides a range of retail and other facilities including banking, grocery and supermarket shopping, Post Office, vet, eat-in and takeaway food, optician, key-cutting, undertaker, two pubs, newsagents, estate agents, dentistry, and a street market. A high proportion of the retail offer is made up of independent stores. As the Local Plan points out, retail occupancy is high.

The Economic Policies Map (Mitcham) identifies an area it describes as Mitcham town centre, and within this marks out the primary shopping area.

## **Recommendation 1**

### **The Local Plan should:**

1. *Make two extensions of the area identified within the Local Plan as Mitcham town centre – described below and shown as (red) annotations of the Local Plan’s map comprising:*
  - a. *An extension of the town centre area to the North to embrace Mitcham Library on one side of London Road and the Monarch Parade shops on the opposite side of London Road. Both are physically and functionally part of Mitcham Village.*
  - b. *An extension to the East to embrace Three Kings Pond and the terraced cottages of Commonsides East which form a natural part of Mitcham Village.*



2. *Rename ‘Mitcham town centre’ as Mitcham Village on the Economic Policies map and a thorough the entirety of the Local Plan.*
3. *Replace reference to ‘Mitcham town centre’ in policy N3.2, with reference to Mitcham Village and formulate policies aimed at developing, enhancing and fostering Mitcham Village as a 21<sup>st</sup> Century village and a 20 minute neighbourhood.*
4. *In detail we want to see policies, including a revised policy N3.2, that emphasise:*
  - a. *All new development within the boundary of Mitcham Village should:*

- i. Recognise, value and protect the character of Mitcham Village*
  - ii. Enhance and strengthen the character of Mitcham Village*
  - iii. Actively promote and support Mitcham Village*
- b. All new development within the boundary of Mitcham Village should be discouraged if it:*
  - i. Disrupts or damages the existing elements which characterise Mitcham Village*
  - ii. Detracts from the continuation of a village feel in Mitcham*
  - iii. Over urbanises, including through excessively high or dense development*
  - iv. Removes green spaces*
  - v. Prioritises the ‘generic’ over the local, special and unique*
- c. All new development which borders the boundary of Mitcham Village should do no harm to the village but instead act as an appropriate gateway to this characterful area.*

We **strongly support** the Local Plan’s recognition that Mitcham Village is not an appropriate location for tall buildings.

**Evidence base.** Since we made our last comments on the previous Local Plan version – in January 2019, Merton Council has begun the process of a Borough Character Study. At the time of writing this still in development, and there has been public engagement and consultation. Mitcham Village is the emerging designation for the heart of Mitcham, providing an evidence base that this is the wish of the wider community. The recommendation to refer to Mitcham as Mitcham Village was agreed by the [Borough Plan Advisory Committee](#) on 26 November 2020.

### **Piecemeal and poor quality consultation draft**

There are many references to Mitcham throughout the Local Plan chapters. In some cases assertions are repeated in different chapters using different wording and there is potential for different parts of the Plan to be read in different ways. This lack of clarity will not support consistent planning decisions.

In the absence of a single document comprising the entirety of the Local Plan it is challenging to cross reference these mentions to be certain that the expression of ideas and assertions about Mitcham is consistent. This makes for a flawed consultation process.

We have twice requested from a senior officer in the Future Merton team (Tara Butler, emailed on 16 November and 27 November), that a single document comprising the entirety of the Local Plan draft be published online. We did not receive a reply to either email and no single document has been published.

Some of the chapters are poorly written, and some are so bad that we find it difficult to believe they have been through any internal scrutiny process. It is not unusual to find places wrongly named. Sentence structure can be challenging, and it can at times be difficult to understand the point that is being made.

The Good Growth strategy chapter is a particularly egregious example, not only displaying bad writing but also lacking paragraph numbering which is provided in (most but not all) other documents. Consider this example paragraph from page 4, randomly selected and quoted verbatim, which is riddled with errors:

“Merton benefits in general with good public transport accessibility. The borough is well served by buses, tube, rails and the tram linking to neighbouring boroughs and to central London. However, some part of the borough is poorly served by public transport, with limited services and choice. We need to ensure that, with the projected rise in numbers of people living in, working in and visiting the borough, people can move around easily.”

We would have expected an internal review process to ensure that errors such as those in the sample paragraph above were corrected before publication, and we are amazed that Merton Council officers would be content to publish for consultation a document of such poor quality.

The Good Growth chapter is not the only chapter of the Local Plan draft which gives cause for concern. Other chapters have their own issues. We note below numerous issues with the site allocation document for Mitcham including duplication, error and omission. In some cases it is impossible to comment on a site because of these issues.

It should be noted that we have not pointed out every error – we are not in the business of copy editing the Council’s work, though we strongly suggest they employ someone to undertake this role.

The Sustainability Appraisal was inaccessible to us during much of our work on the Local Plan as it was behind a login barrier.

***Recommendation 2***

*The site allocation document for Mitcham is comprehensively reviewed, and reissued for further public consultation.*

***Recommendation 3***

*A firm editorial hand is brought to bear on every published consultation document, and the entirety republished.*

***Recommendation 4***

*A single document containing the Local Plan chapters and supporting documents is published, allowing easy cross referencing and more comprehensive review. This to be published in addition to the individual chapters and sections for those consultees who do not want or need to view the complete Local Plan.*

***Recommendation 5***

*A new round of public consultation is undertaken when the above recommendations are actioned.*

## **Chapter 5 Mitcham**

The case is made earlier in this document for revising references to Mitcham town centre and replacing this with Mitcham Village. See above for the argument and recommendations.

There are numerous points of information relevant to understanding the Mitcham section of the Local Plan in other chapters of the Plan.

While we understand that it is necessary to address Mitcham (and other geographical areas) against their relevant broad topic sections, spreading information around in this way makes it difficult to put the Mitcham section (and other geographically based sections) into their full context. The problem is exacerbated because it is impossible to search the entire Local Plan document for phrases in one single sweep. This issue also opens the door to inconsistencies of approach and interpretation of policy – which we point out above – making it difficult for the Plan to support consistent planning decisions.

### **Recommendation 6**

*Extract points relevant to Mitcham from all the topic based sections and reproduce them in the Mitcham section, to contextualise the Mitcham policy and its justification. It is possible to do this using design and/or typography to make it clear the extracts are from different parts of the Plan, and to point to the relevant chapters. This will have the added benefit from an editorial point of view of highlighting and allowing the elimination of inconsistencies of fact or interpretation.*

### **Recommendation 7**

*Include the Mitcham Village map with Policy N3.2 (either within the policy, directly before it or directly after it), so that it is easy to understand the geographical reach of the part of Policy N3.2 that relates to Mitcham Village. For the absence of doubt, this map will be the revised Mitcham Village centre map and policy proposed above.*

Policy N3.2 should be much more emphatic in relation to Mitcham Village (in the policy referred to as Mitcham Town Centre) and the attention given to it. The policy says “To improve the overall environment of Mitcham town centre by providing quality shop fronts new homes, good transport links”. Quality can be both good and bad and the policy should say which it is aiming to achieve.

### **Recommendation 8**

*To provide clarity on the nature of the quality being aspired to in Policy N3.2 replace the word “quality” with “the highest quality”.*

### **Recommendation 9**

*Revise Policy N3.2 so that it reflects the points made in Recommendation 1 above, including the specific points in section 4 of Recommendation 1 which clarify how the policy will strengthen Mitcham Village.*

Policy N3.2 prioritises improving the quality and mix of tenures, “in particular supporting homes above shops in the town centre”. An active village centre requires an active streetscape, and this point is made vigorously in numerous non-geographically based chapters of the Plan. We therefore expect to see a prioritisation of the development of active frontages over inactive ones.

**Recommendation 10**

*The policy should be clear that the provision of ground floor housing should be discouraged in Mitcham Village. While this is mentioned in Justification point 1.2.6 it is not clearly enshrined in the policy. A new policy point should be added to make this clear.*

**Recommendation 11**

*The policy should be clear that it will prioritise and seek to encourage active frontages.*

Policy N3.2 (m) discusses the leisure and recreational uses of underused spaces. There are many sports pitches, playing fields and indoor sports facilities in schools. We would expect the policy to specifically reference the use of these spaces by the wider community out of school hours.

Justification point 1.12.16 mentions the opening up of private land to public access for sport and recreation. This is relevant not only in the context of “Making more of underused spaces and place around Mitcham”, but also in the context of supporting health and wellbeing, and taking steps to address health inequalities.

Chapter 2, Good Growth Strategy is clear that health inequalities between the east and the west of the borough are significant. It states “Our health inequality gap is growing..... residents suffering from poor health in Merton are concentrated in our deprived wards mainly in the east” (page 3).

The Mitcham policy should join the dots between health inequalities and access to recreational facilities, and opening up access to school facilities should be part of a broader strategy to encourage physical activity for health and wellbeing.

**Recommendation 12**

*Expand Policy N3.2 (m) to specifically reference the use of school pitches and other school facilities, and in the justification add content that explains the reasoning.*

Justification point 1.2.3 presents a one-sided view and should be revised. While we welcome some of the smaller interventions created from the £6m Investment mentioned in this point, the net result has not been entirely positive. For example, as a direct result of changes made during the ‘Rediscover Mitcham’ works:

- Walking around the village centre has been made more challenging due to the introduction of traffic lights which prioritise vehicles over pedestrians and the full opening up of Upper Green West and Upper Green East around Fair Green to motor traffic.
- A significant amount of village green has been lost to allow for a bus street that has carved Mitcham Village centre in two.
- The promised designation of new areas of village green has not materialised.

- The much vaunted investment in revivifying Mitcham Market has had no perceptible effect, though the hard landscaped ‘market square’ is now much larger.
- The mechanism in the ‘restored’ clock consistently breaks.
- There has been no formal research to prove the point that the changes have, as is claimed in Justification point 1.2.3, “helped drive extra footfall to businesses around the Fair Green”. Making such claims is disingenuous as the research needed to evidence then is impossible to conduct, since there was no baseline research completed before the work was carried out.

**Recommendation 13**

*Revise Justification point 1.2.3 to more accurately reflect the facts described above.*

**Recommendation 14**

*Remove from Justification point 1.2.3 the unsubstantiated and unprovable point that the spending mentioned has “helped drive extra footfall to businesses around the Fair Green”.*

Justification point 1.2.4 states a commitment to “attractive streetscape, places to dwell”. Achieving this is not just about ground level appearance. It is also about the overall ambiance of an area, including the design and height of buildings. Mitcham Village needs a low buildings policy, with no new development more than four storeys tall in the village, and no new development in the village being taller than that which is adjacent to it to help avoid a steady creeping rise in building height over time.

This is the clear intention of policy LP D51 which defines a tall building with reference to London Plan Policy D9 – “As referenced in London Plan policy D9, the definition of a tall building in Merton is based in part on the site’s context: it is defined as any building that is over six storeys and is also substantially taller than their surroundings and cause a significant change to the skyline.” (sic).

A policy point which lowers this height to 4 storeys for Mitcham Village will help protect the village ambiance and appearance.

**Recommendation 15**

*Add a point to policy N3.2 Mitcham Village Centre (currently referred to as Mitcham town centre), stipulating building height policy, and in a Justification point make the reasoning clear.*

Justification 1.2.9 and 1.2.10 discuss the need for housing and the potential benefits it can bring. There is a significant need to be mindful that Mitcham Village has a special character, and overdevelopment of poor quality, overly dense housing will dilute this. We already see evidence of a significant number of poor quality developments in the surrounding area and, indeed, in Mitcham Village itself.

Merton Council should commit to the production of a Design Code for Mitcham Village, in order to ensure the highest quality development, enshrine the policy on building height, and support the aspirations of developing Mitcham Village as a vibrant centre which retains its special character. This design code should be co-designed with the community.

**Recommendation 16**

*Include in the Justification a commitment to developing a community co-designed Design Code for Mitcham Village.*

Justification point 1.2.11 mentions the much delayed Wilson clinic. It contains the wrongful statement that “we will continue to work with the NHS Clinical Commissioning Group and other partners to protecting and improving the healthcare capacity of the borough currently serviced by Wilson Clinic.”

In fact, the Wilson clinic closed in 2017.

New facilities were originally scheduled to open in mid-2020. A series of delays have meant that at the time of writing in early 2021 work has not begun on the new facility, and its funding is not certain. While the Wilson is serving a role as a Covid-19 vaccination centre we must assume this is a temporary use.

The absence of services formerly provided at the Wilson and identified as required for the new Wilson clinic leaves significant communities in the East of Merton without access to important specialist healthcare, potentially exacerbating the health inequalities between east and west.

**Recommendation 17**

*Correct the error of fact on the operation of the Wilson clinic, and include the fact that work has not yet begun.*

**Recommendation 18**

*Provide clarity on health inequalities, for example using available statistical information about the differences between east and west Merton, and explain what is in reality being done to help redress these, to provide context for the aspirations laid out in the Plan.*

**Recommendation 19**

*Provide clarity on GP enrolment, compared with the population, both current and projected, on a ward by ward basis (for Mitcham here, and for the whole borough in a supporting document), in order to help understand access to primary health care services, the need to plan carefully for these across a growing population, and the context for the aspirations laid out in the Plan.*

**Site allocations**

There are many errors of omission and fact in the site allocations, including half sentences indicating incomplete information. We have not pointed all of these out in our comments – they will be immediately visible to anyone going through the site allocations with an editorial eye.

**Recommendation 20**

*The full text of each site allocation should be reviewed to ensure that the information presented is complete and accurate.*



### **Sites Mi14 Elm Nursery Car Park, Mi5 Land at Canons Madeira Road, Mi11 Raleigh Gardens car park**

These sites were given planning permission specifically as three of a grouping of four sites to be developed by Merton Council's development company Merantun. A decision has been taken to wind Merantun up, with a view to disposing of the sites, because their development was no longer viewed as viable. In this context it is clear that the sites are not viable for development either individually or as a group, by any developer, if they are to meet policy. The logical conclusion is that all four sites should be deleted from the Plan as they are undeliverable.

#### ***Recommendation 21***

*Delete sites Mi4, Mi5, Mi11 and from the site allocations map.*

### **Site Mi2 Birches Close, Mitcham**

The *site allocation* is residential, and is presented as tied to the opening of the Wilson Hospital site as a new healthcare centre. As noted above the development of the Wilson site has been subject to numerous delays, and its final use would seem not to be guaranteed at the time of writing.

The designation of the site for housing seems too narrow, and an addition of community use is appropriate. Even if the site is primarily used for housing in the future some community allocation should not be excluded.

There is an incongruity in that *design and accessibility guidance* cites uses of the site as "either healthcare or sustainable homes", adding a further, healthcare designation to the site. We are not opposed to the addition of a healthcare designation to the site allocation.

Under *Impacts Listed buildings or undesignated heritage assets*, Birches house is mentioned as a locally listed building. For the absence of doubt the text should be clear that this building should be retained within any development.

#### ***Recommendation 22***

*Add Community Use and Healthcare to the site allocation.*

#### ***Recommendation 23***

*Amend design and accessibility guidance to indicate that the locally listed Birches House to be retained.*

### **Site Mi6 326 and 328 London Road**

The *Site description* erroneously says "the area is characterised by mansion blocks of apartments such as Glebe Court". While Glebe Court does provide some of the immediate local context, this is also provided by the two storey dwellings of Glebe Square, the opposite Grade II listed Elm Lodge and beyond that the Cricket Green open space and its many nationally listed buildings. Only some of these are noted in the site location's *Listed Buildings or undesignated heritage assets* section. The *site description* should further note that the Glebe Court blocks are, like the two buildings on the

site, set back significantly from the road and designed to sit in broad, landscaped gardens which provides context for any future development on this site. The *site description* and *Listed Buildings or undesignated heritage assets* section should also note that the CAB building is locally listed. This is a significant designation and the building should be retained in any future development of the site.

**Recommendation 24**

*Amend the site description to more accurately reflect the surrounding characteristics.*

**Recommendation 25**

*Stipulate that the locally listed CAB building should be retained.*

**Recommendation 26**

*Provide clarity that the landscaped frontage of Glebe Court provides context for any development of this site.*

**Recommendation 27**

*Amend Listed Buildings or undesignated heritage assets to fully reflect the local surroundings.*

**Site Mi7 326 and 328 London Road Mitcham**

The site location map is accurate, the accompanying text is for another site.

The information relevant to this site needs to be published for consultation.

**Recommendation 28**

*Provide the right information for this site as a matter of urgency, and reconsult with a new consultation deadline.*

**Site Mi8 Majestic Way**

This is the largest and most significant development site for Mitcham Village in the Local Plan. Any development will significantly affect the character of the heart of Mitcham Village. The site designation and related text needs to reflect this, bringing clarity about the potential to enhance Mitcham Village and about the aspirations for development.

In particular there should be clarity on building height, and on the potential for a mix of uses including but not limited to retail, as well as taking opportunities to be inclusive to the cultural diversity of the area.

**Recommendation 29**

*Amend the Design and accessibility guidance to provide far greater clarity and guidance that this site should respect and enhance the character of Mitcham Village, respect the building height policy (which we recommend elsewhere should be no more than four storeys in Mitcham Village) be considerate of inclusivity to the cultural diversity of the area and provide for Mitcham's cultural needs.*

### **Site Mi9 Former Mitcham fire station**

The *Impacts Listed Buildings or undesignated heritage* assets section fails to note the Grade II listed war memorial immediately adjacent to the site or the Grade II listed milestone nearby.

#### ***Recommendation 30***

*Revise the Listed Buildings impacts section to include the Grade II listed war memorial immediately adjacent to the site and the Grade II listed milestone.*

### **Site Mi10 Mitcham Library**

We have recommended an extension of Mitcham Village to include the library building, so the *design and accessibility guidance* needs to reflect that Mitcham Library sites within Mitcham Village.

#### ***Recommendation 31***

*Revise the Design and accessibility guidance to reflect the fact that the library building is within Mitcham Village.*

### **Site Mi11 Raleigh Gardens car park**

We argue above that this site should be removed from the Local Plan.

This notwithstanding – the approach to tall buildings states that development of the site could include taller buildings. This is imprecise terminology, and is entirely inconsistent with the tall buildings policy referenced below and elsewhere in our comments. It should be reworded. There are three primary reasons for this:

- Building in excess of six storeys anywhere in Mitcham, whether inside or outside Mitcham Village, contravenes policy LP D5.1 which defines a tall building with reference to London Plan Policy D9 – “As referenced in London Plan policy D9, the definition of a tall building in Merton is based in part on the site’s context: it is defined as any building that is over six storeys and is also substantially taller than their surroundings and cause a significant change to the skyline.” (sic). The policy also states that “Proposals for tall buildings will be permitted only within Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area”. (Policy LP D5.1 Ch 16 Place and Spaces in a Growing Borough).
- The *site Design and accessibility guidance* states that permission has already been given for a development on this site. It has a maximum of 6 storeys. The *design and accessibility guidance* states that “Development will need to protect the residential amenity of adjoining properties to the rear”. This requirement can not be met if a taller building is put on this site. Indeed Glebe Court residents with windows facing the development that has planning permission would already experience significant loss of light to their rooms if the current permission were to be built out.

- Any development on this site needs to present an appropriate visual gateway to Mitcham Village Centre.

**Recommendation 32**

*Remove this site as indicated above. If the site is not removed, revise the text to accurately reflect Policy LP D5.1.*

**Site M12 Sibthorp Road car park**

This site is within Mitcham Village. As such it should respect the village character and no development should be undertaken which is above four storeys in height.

*Impacts Listed buildings or undesignated heritage assets.* The text here is wrong. The site is within the wider setting of two of the three Grade I listed buildings in Merton. Eagle House and its railings are listed separately.

**Recommendation 33**

*Amend the Design and accessibility statement to provide clarity that the site is within Mitcham Village, and that the policy of no building above four storeys pertains.*

**Recommendation 34**

*Amend the Impacts Listed buildings or undesignated heritage assets text to accurately reflect that the site is within the wider setting of two of the three Grade I listed buildings in Merton.*

**Site M13 St Marks Road**

This site is within Mitcham Village. As such it should respect the village character and no development should be undertaken which is above four storeys in height.

**Recommendation 35**

*Amend Design and accessibility to provide clarity that the site is within Mitcham Village, and that the policy of no building above four storeys pertains.*

**Site Mi19**

The information for site Mi9 has been repeated in error.

**Recommendation 36**

*Provide the right information for this site as a matter of urgency, and reconsult with a new consultation deadline.*

## **Chapter 2 Good Growth Strategy**

As noted earlier this is one of the worst written chapters of the Local Plan, and at times it is impossible to divine the meaning it is trying to convey. It requires a detailed and thorough reworking.

The opening of the section on Mitcham points out that Mitcham lacks “high street brands” which it identifies as “clothes store to coffee houses” (sic), and states that because of this “the town centre has limited choice”.

This statement completely misunderstands the special character of Mitcham Village, and frames it within an entirely inappropriate context.

Chapter 11 Economy point 7.5.15 accurately notes that “Mitcham has a unique cultural identity and character”. Chapter 5, Mitcham, point 1.2.2 notes “vacancy rates in Mitcham are generally low (lower than average in England and in London)”. The village centre is characterised by small, independent shops that meet a diversity of local needs. As we point out earlier in this document the current retail offer includes banking, grocery and supermarket shopping, Post Office, vet, eat-in and takeaway food, optician, key-cutting, undertaker, two pubs, newsagents, estate agents, dentistry, and a street market.

These are key retail characteristics which the Local Plan should both recognise and seek to enhance. Doing so, while at the same time understanding and fostering the cultural diversity which is a special characteristic of Mitcham Village and Mitcham more widely, will promote good growth for Mitcham Village. It will also support Mitcham Village in being a 20 minute neighbourhood – something which the Local Plan is keen to promote.

Encouraging “high street brands” would dilute and make bland what currently makes Mitcham Village special.

### ***Recommendation 37***

*Completely rewrite this section to:*

- *Reflect the true character of Mitcham Village*
- *Recognise and celebrate the value its diverse culture brings*
- *Describe the true range of the existing retail offer, the range and diversity of independent retail and the exceptionally low premises vacancy rates*

### ***Recommendation 38***

*Incorporate the 20 minute neighbourhood value of the current Mitcham Village offer into the text and clarify that policy aims to develop this further without diluting local cultural diversity, independent retail and other factors which give Mitcham Village its distinctive and unique character.*

## **Chapter 11 Economy**

Point 7.5.15 accurately notes that “Mitcham has a unique cultural identity and character”. Yet there is no attempt within this chapter to describe that cultural identity and character. The closest the

chapter gets is point 1.2.7 – quoted here in full “Mitcham is home to a number of ethnic groups who bring energy and entrepreneurial flair to the community as well as a variety of cultural shops and services which collectively enrich the distinct cultural identities of Mitcham.”

This opaque language is by no means good enough. Clichéd terms such as “cultural shops” and the catch-all “a number of ethnic groups”, is patronising, arguably racist language which fails to capture the variety and vibrancy of the local scene. It suggests Merton Council does not have any understanding of the makeup of Mitcham. Such bland, undefined terminology is insufficient ground on which to base any policy.

The Plan needs to work much harder on this area, if it is to show the council understands Mitcham Village and can adequately support it in the coming years.

**Recommendation 39:**

*Much more detail is required to:*

- *Describe the local character and diverse cultural and ethnic makeup of Mitcham*
- *Explain how this contributes to local character and economy*
- *Show how and why this makes Mitcham special and different*
- *Demonstrate through policy (Policy N3.2) how cultural diversity and the benefits it brings is recognised and how this will be supported going forward*

**Chapter 15 Infrastructure**

Policy IN16.2 states that Merton Council will “Support the principle of a new Health and Wellbeing Community Hub in Mitcham.” It is our assumption that this relates to the community hub facilities proposed to be part of the Wilson healthcare facility. As we note above in relation to coverage of this in Chapter 5 Mitcham, the Wilson clinic closed in 2017. New facilities were originally scheduled to open in mid-2020. A series of delays have meant that at the time of writing in early 2021 work has not begun on the new facility, and its funding is not certain. It is our understanding that funding for clinical services and funding for what the policy here calls the “Health and Wellbeing Community Hub” are entirely separate, with only the clinical services guaranteed through CCG / NHS England funding routes. Much more explicit consideration of the nuances should be given.

**Recommendation 40**

*Expand Justification point 16.1.56 significantly so that it:*

- *Explains the nuanced difference between the funding of clinical services and community services.*
- *Provides greater clarity on how Merton council has been working with “a number of stakeholders” and how it plans to do this going forward.*

Point 16.1.56 states in full “One of the key priority areas identified in the draft Strategy is a new Mitcham Health and Wellbeing Community Hub, which is supported by the council. The CCG has

been working with a number of stakeholders to bring forward plans for a new health and wellbeing space in Mitcham, ensuring that vacant and underutilised sites are brought back into use.”

The Plan is inconsistent in how it refers to the putative services planned for the Wilson site, and what is here called the “Mitcham Health and Wellbeing Community Hub” is referenced differently elsewhere. This creates a lack of clarity on both the definitive and agreed terminology and on what might actually be hoped for or planned for at the site.

In addition, in relation to the “new health and wellbeing space in Mitcham” the aim is apparently “ensuring that vacant and underutilised sites are brought back into use.” Notwithstanding that the Wilson site is a single site, not multiple sites, its disuse is planned, and the point fails to reflect this.

***Recommendation 41***

*Revisit this point in its entirety to ensure greater clarity.*

***Recommendation 42***

*Revisit the entire Plan to ensure that the Wilson site and both planned and hoped for services are accurately and uniformly described.*

Point 16.1.29 asserts that social and community infrastructure can be “publicly or privately funded or run by charities”. Charities can provide both publicly and privately funded infrastructure, and charity is not a third funding option. Infrastructure can also be provided by organisations with other structures such as social enterprises. If the Plan wishes to make a point about community infrastructure provision and the potential role of charities and other organisational structures it should be much clearer.

***Recommendation 43***

*Tighten up the language for accuracy and clarity.*

## **Chapter 17 Transport & Urban mobility**

Unfortunately this chapter lacks numbered paragraphs.

The Justification around Policy T6.7 says “To accommodate new growth sustainably it is essential that development encourages more walking, cycling and public transport use to reduce its impacts on the environment, road network, congestion noise and air pollution from vehicles. This need is especially relevant in Wimbledon, Colliers Wood and Morden town centre”.

Mitcham Village is notably absent from this list, and should be included in it.

Roads including London Road (both north and south of Mitcham Village), Commonside East and Raleigh Gardens are regularly clogged with traffic. ‘Intelligent’ traffic lights installed following the Rediscover Mitcham programme prioritise vehicles over pedestrians. Movement on foot between shops often involves crossing several sets of lights, taking time and discouraging getting around on foot. The ‘bus street’ also opened as part of the Rediscover Mitcham work has brought polluting buses into the heart of Mitcham Village. Polluting cars have been brought to the grassy centre of Fair

Green thanks to the full opening up of Upper Green West and Upper Green East to motor vehicles. Merton Council seems incapable of controlling pavement parking, which is a constant and consistent feature of Mitcham Village to the point where it has become normalised. This can mean anyone with a buggy or using a wheelchair is barred from access to certain pavements.

***Recommendation 44***

*Add Mitcham Village to the (unnumbered) paragraph listing locations in need of greater ease of pedestrian movement.*

***Recommendation 45***

*Explain the particular issues faced in Mitcham Village, to include those we describe above, and how policy will be formulated and implemented to alleviate these issues.*

**Proposed Cycling Measures Map (Merton)**

Measure 11 - 2.5m shared use path in town green alongside Commonside West.

We do not support this measure which would result in the removal of protected green space.

***Recommendation 46***

*Remove the shared use path on the town green along Commonside West from the Plan.*