



**MITCHAM SOCIETY**

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**25/P2282 1 - 12 Majestic Way Mitcham CR4 2JS**

DEMOLITION OF ALL EXISTING BUILDINGS, STRUCTURES AND ACCESS RAMP AND THE ERECTION OF BUILDINGS COMPRISING FLEXIBLE COMMERCIAL AND COMMUNITY FLOORSPEACE AND RESIDENTIAL ACCOMMODATION WITH ASSOCIATED AMENITY SPACE, LANDSCAPING, PARKING, SERVICING ACCESS, BUS STAND AND HIGHWAY WORKS.

**Mitcham Society comments**

**October 2025**

1. Mitcham Society understands and supports the need for social housing, including the need for new provision. We believe social housing, like other tenures, should be of the highest quality, well designed and fit for its surroundings, and make a positive contribution to the streetscape.
2. This proposal does not achieve these goals. While including some welcome strategy for the commercial offer, the community space offer is incomplete and unconvincing. In terms of its design, height and bulk, this proposal is entirely out of context for Mitcham Village. It is bland and blocky, would blight the heart of the Village and dwarf our current hero buildings and amenities such as the iconic White Lion of Mortimer and Kings Arms pubs, our Village Green, Market Square and Grade II listed clock tower. It would visually dominate every approach to Mitcham Village, subsuming the heart of our Village because of its bulk and mass. It fails to meet several policies in the new Local Plan. Merton Council's own Design Review Panel has been scathing, giving it a Red rating.
3. This prime site in Mitcham Village deserves much, much better.

**Pre application community engagement**

4. We met with the applicant twice, in September 2024 and July 2025. On both occasions we were given minimal information about the proposals, despite the planning application being registered by Merton Council on 17 August 2025 just a few weeks after our second meeting, suggesting that by then Clarion had finalised the bulk of their planned submission.
5. We note that the Statement of Community Engagement conflates our comments with those of another local organisation rather than dealing with them separately. This does not seem, to us, to be respectful to the thoughts of either organisation, and suggests the

applicant has not taken our thoughts seriously. We do not regard this as a fair and reasonable approach to engaging with us, and do not think it is in the spirit of what community engagement should look like. Nor is it consistent with the sentiment expressed by Clarion on announcing their acquisition of the Majestic Way site – when it [wrote](#) “Clarion looks forward to engaging extensively with local stakeholders, including local community groups, local councillors, local schools and businesses, to ensure the redevelopment reflects the aspirations and needs of the area.” Indeed in general we feel the level of engagement with members of the public has been minimal, and can not by any stretch of the imagination be considered “extensive”.

6. We further note that the Statement of Community Engagement comments that in its engagement with us and another organisation there was “Concern about the scale and massing of the new buildings, particularly in terms of height (to note. no height details were available at this point)” (Statement of Community Engagement point 3.27). In fact, for our part, we were fully aware at our second meeting with Clarion, that there were ambitions for 11 storeys, as we had read Planning Application 25/P0359 which was registered 12 February 2025 with the proposal text “EIA SCREENING OPINION FOR THE PROPOSED DEMOLITION OF THE EXISTING COMMERCIAL BUILDINGS, MULTI STOREY CAR PARK AND ASSOCIATED ACCESS RAMP. **NEW BLOCKS WILL BE BUILT ON THE SITE BETWEEN 6 AND 11 STOREYS HIGH, BROADLY WITHIN THE EXISTING BUILDING'S FOOTPRINT. AND ASSOCIATED WORKS. A STANDALONE BUILDING IS PROPOSED AT THE NORTH OF THE SITE IN THE LOCATION OF THE CURRENT CAR PARK ACCESS RAMP. THE SITE WILL DELIVER APPROXIMATELY 250 RESIDENTIAL UNITS.**” (our bold text).

#### **Design Review Panel**

7. The applicant took a presentation to the Design Review Panel on 26 February 2025. After that meeting had taken place, we emailed Brian Ham, Director of Major Projects at Clarion asked if he would share the presentation and comments from the panel with us. In his reply Mr Ham wrote: “this is part of the formal LB Merton planning process and it is for them to decide what they share and who they share it with: that is not to say we don’t want it to be shared, but that it’s Merton’s decision to make, not ours.” [email from Brian Ham to Mitcham Society 4 March 2025]. We do not believe this is accurate. We understand that the decision on whether to share design review presentation and comments lies with the applicant.
8. At the time of us writing this submission, despite Mr Ham’s inference in his email (above), that Clarion is not against sharing the Design Review Panel presentation and comments received, we note that these have not been made available as a separate document with the papers associated with this planning application.
9. Instead, the Design and Access Statement point 5.4 provides Design Review Panel feedback and Clarion response. It does not share any visual information provided to the Design Review Panel, nor are we clear if what is reported is the full Design Review Panel feedback and word for word reproduction, or partial feedback and paraphrased. Failure to disclose their the Design Review Panel presentation and its feedback in full is far from open and transparent on the part of Clarion.

10. In the Design and Access Statement point 5.4 the Design Review Panel is reported as giving the scheme as it was presented to them a Red rating (on their Red, Amber, Green scale). We do not believe the application as submitted addresses key Design Review Panel concerns as they are reported in the Design and Access Statement, or that the Design Review Panel's Red rating has been given the respect it deserves. We particularly want to reiterate a number of points reportedly raised by the Design Review Panel in the Design and Access Statement point 5.4 as pertinent to the application as submitted. The following bulleted list is direct quotations from the Design and Access Statement Part 02 p39, and we feel all the points quoted need further attention by the developer:

- *Context and Design Approach*
  - *"The Panel questioned the scheme's relationship with Mitcham's town centre context."*
  - *"the Panel stated concerns that the scheme comprised 'overdevelopment.'"*
  - *"Concerns were raised about its visual impact, especially on listed and locally listed buildings, as well as views from Fair Green and the primary school playground."*
- *Height and Massing*
  - *"the proposed height, unit numbers, and "snake-like form" were inappropriate for the location."*
  - *"The scale and rhythm of the design were described as out of character for Mitcham, failing to reflect its architectural identity."*
- *Architectural Detail and Layout*
  - *The elevations were criticised for lacking relief and variety"*
- *Green Infrastructure and Sustainability*
  - *"The loss of Grade A trees was a significant concern."*

### **The ground floor**

11. The ground floor plan to combine retail and community uses is outlined clearly in the Town Centre Commercial Use Assessment & Strategy. This document puts Mitcham Village in a broad context of other local centres both within Merton and further afield.
12. We fully agree with the ambition this document expresses for the commercial segment of the ground floor of this development to focus primarily on small units, with a landmark offer if possible for the corner unit (the role currently played by Poundland). The expressed sentiment that "The potential tenants for Majestic Way are likely to be a mix of local independent and small chains, as well as potentially some national chains with very localised requirements." (Town Centre Commercial Use Assessment p97) sounds right for Mitcham Village.
13. We are concerned, though, that at the time of writing it has become clear that Lloyd's Bank, currently in Majestic Way will leave Mitcham Village. There is local pressure for a banking hub to be put in place, including a campaign being spearheaded by the MP for Mitcham and Morden. We would expect Clarion to publicly voice support for this campaign, and get involved where it can, for example to help secure premises and provide other appropriate support if and when a banking hub is confirmed. If Clarion truly aspires to support a thriving local economy in Mitcham Village, this seems an obvious thing for it to do.

14. By contrast, the thinking on the community space is barely progressed at all. The very title of this document - Town Centre Commercial Use Assessment & Strategy – notably lacks any mention of community space, and the extremely short (one page) section on this topic contains the phrase “the ultimate use for this space is to be agreed with the London Borough of Merton”. This points to an extremely disappointing lack of clear vision for this space on the part of Merton Council, and we expect much more clarity to come forward at an early stage. At the very least we expect to see an early commitment by Merton Council to incorporate the public toilets which are so desperately needed by Mitcham Village – including a Changing Places toilet.
15. Looking at the Delivery & Servicing Management Plan it is clear from figure 3-1 on page 11 that double doors leading into the community space at the junction of Majestic Way and St Mark’s Road face a large loading bay. This is potentially a very inhospitable area. Loading bays can become dirty, uncared for and unwelcoming. A rethink either of the location of the doors and/or the loading bay would be welcome.

### **Height, massing, design**

16. The applicant makes much of its concentration of height and massing towards the north of the site. This does not mitigate the fact that the even at its lowest, ground floor plus 5 storeys, it will dwarf everything around it. Not only would the bulk, height and massing of this development damage Mitcham Village in itself, it would have a wider effect. With numerous other sites existing in and around the heart of the Village, permitting this development would give a green light to others to match or exceed it. Mitcham Village would become characterised as an area of tall blocks, losing entirely its historic and distinct character. Merton Council surely does not want that to happen?
17. That strategy is certainly not what is presented in the Local Plan, which was adopted in November 2024. This new Local Plan is stronger on tall buildings policy than its predecessor was. A dedicated policy, D12.6 covers this topic. Point 3 of this policy is crystal clear, (our bold text):

#### *3. Tall buildings are **only** acceptable in the following locations:*

- a. As indicated in the Strategic Heights Diagrams for Morden Regeneration Zone and Wimbledon Town Centre.*
- b. Wimbledon Town Centre, as set out within the chapter on Wimbledon.*
- c. Morden Regeneration Zone, as set out within the chapter on Morden.*
- d. As set out within Merton’s adopted Estates Local Plan 2018 for Eastfields and High Path estates.*
- e. Where they are identified in the following site allocations, CW2, Mi1, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.*
- f. On sites immediately adjacent to the above locations, where they would provide design-led opportunities for appropriate transitional elements between differing building scales.*

18. The Local Plan identifies this site as Mi8. The site capacity is stated as 60 – 160 new homes. This proposal is for 249 new homes – a total uplift of 89 on the maximum site capacity in the Local Plan, and 189 on the minimum site capacity. Put another way, the number of homes proposed is 4.1 times more than the minimum site allocation and 1.56 times more than the maximum site allocation. We can not find a clear justification of this uplift. Nor has the applicant published a viability assessment which we would expect to see as a separate document with this planning application.
19. There is little to commend the very blocky and box-like overall design, which has a definite whiff of the “bland, and could be found anywhere” about it. The various documented attempts to draw on local vernacular often feel trite and box-ticking rather than fully realised. For example, a feeble homage to the locally listed landmark White Lion of Mortimer pub is to insert widely vertically spaced and in many cases broken horizontal bands of white, apparently to mimic the very distinctive and much more closely spaced pattern on the pub. In reality the White Lion would be engulfed and marginalised by the sheer bulk of the proposed development.
20. The design and accessibility guidance in the site allocation includes: “Development proposals’ design and building must make an attractive and significant contribution to improving the look and feel of the whole town centre and Fair Green. In addition, be sensitive to Mitcham town centre landmark, namely the clock tower” This large and overbearing proposal clearly and definitely detracts from the look and feel of the whole centre and of fair green, and harms the setting of the Grade II listed clock tower.

### **Housing mix**

21. Local Plan Policy H11.3 requires a housing mix borough wide of 33% 1 bed, 33% 2 bed and 34% 3 beds or more, though it does suggest this can be varied on individual sites. The Design and Access Statement part 6.13 is clear that the housing mix split in this development is a very long way from the borough level requirement. Clarion’s offer is 26% 1 bed, 55% 2 bed and 19% 3 beds or more.
22. Bizarrely the Planning Statement point 6.36 states that this split is “in broad compliance with H11.3”. It is an interesting world when splits into almost equal thirds by Merton Council are viewed as “broadly compliant” with a split whose percentages are 26:55:19. The Planning Statement goes on to claim the housing mix has regard to the “constrained urban Site and the form of development proposed, which is not considered to be as appropriate for a larger number of family homes.” (sic).
23. And yet the Planning Statement recognises, in point 6.32 that “It has recently been published that Merton has the third longest housing register expected wait time of all England LPAs for a three bedroom home, which is 102.4 years.” So, the applicant admits that its ambition to overdevelop the site trumps Merton Council’s housing mix requirement, despite a clearly pressing and very significant need for larger social homes.
24. Could Clarion try harder? Yes. Reducing the number of dwellings overall, and the problematic height and blocky design (recognising that it is far from ideal for families to live several storeys above ground level), may allow more families to get their much needed social homes.

25. The broader and very relevant point is that if Clarion can't achieve this, what hope is there? Private developers much prefer smaller dwellings which create greater sales profitability and regardless of dwelling size, increasingly fail to meet their "affordable" targets. As Merton Council's key provider of social housing, including those waiting on the housing register, it is surely up to Clarion to be the exemplar.

### **Dual aspect homes**

26. The Design and Access Statement part 6.13 states that 70% of homes will be dual aspect. Merton Council Local Plan Policy D12.3 Ensuring high quality design for all developments, is clear at point y that "In residential developments, maximise the provision of dual aspect homes." We are unconvinced that this policy requirement is being met. Overdevelopment of a site results in compromises on many factors, including the creation of dual aspect homes. We noted at the outset that social homes should be of the highest quality. We believe the appropriate target for at least dual aspect should be 100%. If that can't be reached, there are design issues to be overcome.

### **Visual impact**

27. We note that many of the views used in the Heritage, Townscape and Visual Impact Assessment are from a convenient distance – convenient because it has the optical illusion effect of making the proposals seem smaller because they are further away. Nonetheless it is apparent that the visual impact of the proposed development is a disaster for Mitcham Village. Its height and massing would cause significant, substantial harm both for the approach to Mitcham Village from all directions, and within the Village itself. It is worth considering the impact in some detail by responding to numerous views presented by the applicant.
28. View 9 Just south of Eagle House, looking east, shows a close approach to the heart of Mitcham Village at the Holborn Way, London Road, St Mark's Road junction. It gives a very clear indication of the sheer scale of the proposed development, and of how it utterly dwarfs the existing St Mark's Road car park – which is itself a dominant feature at present. View 10, from Armfield Crescent, shows how the open aspect across the children's play area is destroyed by the bulk of the proposal.
29. The quiet terraced streets that border the St Mark's School side of Mitcham Village are also to be badly affected. View 12, looking from Montrose Gardens, and View 3B from St Mark's Road and Baker Lane show how the development would present a large, dominant full stop at the end of terraces of houses.
30. Mitcham Village centre's focal points are entirely destroyed by the monolithic monster development. View 1C makes this abundantly clear. Our Village green, our market square and our Grade II listed clock tower are all rendered completely subservient to the proposed development. The setting of the Grade II listed Clock Tower is harmed to an alarming degree, and its prominence and dominance would be destroyed for ever.
31. Also in View 1C what the developer calls a "moderate step change in terms of building heights" is shown for what it is – not moderate at all, and in fact dwarfing the White Lion of Mortimer pub even with the lower building height facing on to London Road. The White

Lion would disappear, Lilliputian against its new giant backdrop. It has not gone unnoticed, either, that the applicant fails to get its street naming accurate. The heading for View 1C is just one example. It refers to Upper Green Way, while the street name is in fact Upper Green West.

32. The several views that show visual impact on the approach to the heart of Mitcham Village are conveniently far away from the proposed development itself, with the effect that they minimise the mountainous effect of the huge block that would dominate views on all approaches to Fair Green and the heart of Mitcham Village. Omission of closer views on these approaches seems an admission by the developer that to provide them would show the reality of the bulk, height and massing on Mitcham Village, which would not be favourable. This is applicable to all of the following, non exhaustive, list of views: view 1A London Road south of junction with Chatsworth Place, looking north; view 1B London Road close to the junction with Elmwood Road, looking north; View 2 Junction of Commonside West and Commonside East, looking west; view 4A Junction of London Road and Bond Road, looking south; view 4B London Road just north of junction with Downe Road, looking south; view 5 Western Road outside Lidl Supermarket, looking north east; view 6 Commonside West north-west of the Windmill Inn, looking north west; view 8 Beehive Bridge, looking west.
33. The closer anybody gets to the Village centre from these viewpoints, the more dominant the proposed development would become. While they might anticipate seeing some of the familiar key features of our Village in their unique formation and small scale landscape (Fair Green, the trees, a sense of open space, the clock tower, the market, the Kings Arms and White Lion pubs), they will now be faced with an increasingly large brick fascia of flats which looks as though it could be built anywhere, and has a sanitising and depersonalising effect.
34. Misleading language is used throughout the Heritage, Townscape and Visual Impact Assessment to suggest that the proposed development lends a more positive vibe than is actually the case. For example, There are 17 views in this document, and in 15 of them the accompanying text offers a sentiment expressed more in hope than expectation, sometimes using minor variations of this language: "Though the Proposed Development will introduce a moderate step change in terms of building heights, this effect is considered to be **beneficial** to the visual amenity of the townscape, owing to the high quality contextual design proposed." (applicant's capitalisation and bold text, pages 43, 47, 51, 59, 63, 67, 71, 75, 79, 83, 91, 95, 99, 103 and 107). The gulf between the applicant's "beneficial" and the reality is stark and destroys any credibility in the process of providing these views alongside an impartial assessment.
35. The proposed development creates a highly significant uplift building heights in Mitcham Village, which is entirely alien to anything in the surrounding area. The Design and Access Statement point 3.5 cites the existing Armfield Crescent and Glebe Court, and the not yet begun Mitcham Gasworks sites among its examples of taller, denser dwellings. Very significantly: the two extant sites (Armfield Crescent and Glebe Court), are designed around green space which is as important to the sites as the blocks themselves and provides a gentle backdrop to the scale and massing of the buildings; none of the three developments has any building as high that that in this proposal; none of the three are in the very heart of

Mitcham Village. The comparison, therefore, is entirely to the detriment of the proposed scheme.

36. Overall, in terms of visual impact this proposed development does not enrich the spatial narrative of the townscape. Rather, as we have noted it becomes increasingly looming as the heart of Mitcham Village comes closer, its height and massing presenting an increasingly oppressive and gloomy outlook for those on approaching the Village centre, and taken overall it presents a stark, jarring, completely out of character mass.

### **Conclusion**

37. The desire to create new social housing is laudable, and we are supportive of this site being used for that purpose.
38. We are also supportive of the expressed wish to use the commercial spaces for small and primarily local businesses. However the other aspect of the space facing onto Majestic Way – the community use space, is poorly realised. There is still no clear concept of what will happen here and, importantly, no commitment to public toilets – include a Changing Places toilet.
39. However this particular proposal is a prime example of overdevelopment. It contravenes policies in the New Local Plan, which was only adopted in November, including significantly overstepping the site capacity, proposing a tall building in an area where these are not permitted, failing on the Council's required housing mix and also failing on single aspect dwellings. Justification of failure to comply with the Local Plan is thin, and the applicant has not provided a viability assessment.
40. As a piece of design the proposal lacks finesse, harms the setting of the Grade II Listed Clock Tower (contravening the site allocation), as well as dwarfing and demeaning our other Village landmarks.
41. Just as this developer prays in aid the overdeveloped and roundly condemned Mitcham Gasworks site, so, if this is permitted, it would undoubtedly open the door for other large sites within and bordering Mitcham Village to be progressed with an "anything goes" approach, heralding a period of ever-taller, poorer quality overdevelopment on these sites.
42. In a wider context that would extend beyond Mitcham Village, the implication would be that the new Merton Local Plan policies are irrelevant not just in Mitcham, but across the whole of Merton.
43. This planning application should be rejected and Clarion required to come forward with a new design more fitting for this key Mitcham Village site.