



MITCHAM SOCIETY

Web: www.mitchamsociety.org.uk
Email: TheMitchamSociety@gmail.com
Twitter: @MitchamSociety

Merton Local Plan Stage 3

Mitcham Society comments

September 2021

Mitcham Society has commented on the previous rounds of the Local Plan preparation, and now presents its comments on the stage 3 consultation.

The Plan needs to address our recommendations for it to be considered sound.

We are disappointed not to see this new Local Plan version referencing Mitcham Village. Our reasoning on recognising Mitcham centre in this way has been made clear in our previous submissions, and we reiterate them here.

Mitcham – a 21st Century Village

As we have noted in previous submissions, Mitcham is a 21st 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 21st Century village.

Mitcham Village is under increasing development pressure, so 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 causing it to become a bland ‘anyplace’.

Ours is not a nostalgic view. We are clear that our aspiration is for a 21st Century village which reflects the diverse, 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.

Recommendation 1

The Mitcham Town Centre designation be removed from the Local Plan throughout and replaced with Mitcham Village.

In our response to the Stage 2a consultation we said the Local Plan should:

Renaname 'Mitcham town centre' as Mitcham Village on the Economic Policies map and a thorough the entirety of the Local Plan.

This has not taken place.

We are aware of suggestions that Merton Council's hand has been forced in this by the London Plan. Indeed the current draft Merton Local Plan states, on p22 "Mitcham town centre is designated as a District Centre..... In the London Plan (London Plan Table A1.1 – Town Centre Network").

This is indeed the case.

However, an examination of Table A1.1 ([London Plan page 476](#)) reveals that there are two villages named in Table A1.1 - Carshalton Village and Cheam Village. Both are classified as District Centres. Both are in the London Borough of Sutton – an adjoining borough. Both Carshalton Village and Cheam Village have considerable similarities to Mitcham Village sharing characteristics such as small scale development, a mix of buildings of different ages, local independent shops, and surrounding green spaces. Carshalton Village a pond.

We conclude not only that there is absolutely no justification for arguing that it is not possible to designate Mitcham Village because of precedent or direction in the London Plan, but indeed that there is an evidence base to show that precisely the opposite is true. It is possible to designate Mitcham Village, the London Plan's two such designations are in a neighbouring borough, and both share many characteristics with Mitcham Village. The London Plan presents no barrier.

In addition to representations to previous versions of the Local Plan, we have also made representations to various other fora on this matter including regarding the Borough Character Study (including to public meetings and to the Borough Plan Advisory Committee).

It is entirely wrong not to recognise Mitcham Village. In failing to do so the Local Plan:

- Misses opportunities to celebrate the village character in its approach to all development, potentially opening up opportunities for the many sites identified in the Local Plan to proceed in a piecemeal fashion without respecting the low rise, village vernacular (including the green and blue infrastructure that includes the Village Green (Fair Green), and the Village Pond (Three Kings Pond, facing another green – Three Kings Piece)
- Misses opportunities for the public realm, which needs to be protected, preserved and enhanced. A village scale public realm is much more subtle and nuanced than that of a town centre. Recognising Mitcham Village would, for example:

- Allow greater weight to be given to the green spaces within and abutting Mitcham Village (including the long awaited yet still not completed designation of Fair Green as Registered Town Green).
- Inherently lend a greater understanding of the importance of the Village Pond and improved public realm connectivity between it and Fair Green.
- Give greater weight to the market, which has been sorely neglected and which could be a thriving centrepiece to the village setting.
- Overall, emphasise the importance of small scale public realm interventions such as floral displays, adequate seating, the provision of long awaited public toilets (promised in the Rediscover Mitcham project which the Local Plan points to as a success, but never delivered), and shop front improvements. While these types of interventions can happen in town centres, their scale and form in a village setting is rather different from that in a larger town centre setting.
- Ensure appropriate recognition of the range of independent shops, and their low rise, relatively small footprints. Preserving what exists and enhancing the offer with new independent shops would project Mitcham Village into the future as a unique and special place.

All of this should be seen in the context of the Covid-19 pandemic, which has seen a rise in the use of local facilities for shopping, for leisure and for exercise. There is much said in the Local Plan and in wider planning policy about how we can build on the idea of the 20-minute neighbourhood.

Indeed, as recommended by us, policy N4.1 now explicitly states:

“c. Improve access to, and movement through, Mitcham town centre by encouraging walking, cycling and public transport that improves links to surrounding neighbourhoods and *supports the vision of a 20-minute neighbourhood* and improving air quality.” [Our italics].

Recognising Mitcham Village and ensuring that policies are appropriately reflective of its character and how it can develop while remaining at its core a village is entirely consistent with the 20-minute neighbourhood concept. It is a pragmatic, forward-looking response to the changes that the Covid-19 pandemic has brought to our behaviours and the expectations we have of local centres.

Recommendation 2

Our proposed Eastern extension be included in the Mitcham Village (currently called Mitcham Town Centre) map and all maps are checked to ensure they reflect this change

The *Economy Policies Map – business and Retail LR* identifies an area it describes as Mitcham town centre, and within this marks out the primary shopping area.

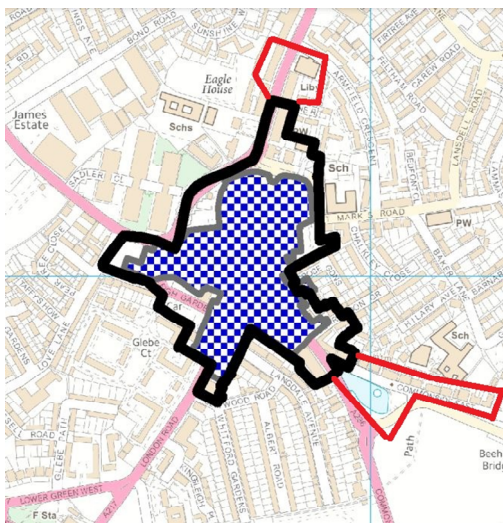
We note that there has been some change to the delineation Mitcham Town Centre for the Stage 3 consultation, which has taken into account some of our recommendations, but not all of them.

In our response to the Stage 2a consultation we said the Local Plan should:

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 Commonside East which form a natural part of Mitcham Village.

We note that on the *Economy Policies Map – business and Retail LR* the Northern extension has been made, but the Eastern extension has not:



Consultation Stage 2a extract from Economic Policies Map

Black line = designated town centre

Red line = Mitcham Society proposed extensions

Consultation Stage 3 extract from *Economy Policies Map – business and Retail LR*

Black line = designated town centre

Blue hatch = primary shopping areas

We wish to see the Eastern extension also added.

It is important to recognise that this designated area is not just about economic activity. Cultural, social and environmental factors are also important. By including the Village Pond and terraced cottages alongside Commonside East the designated area will recognise different types of asset that contribute to the character of Mitcham Village.

All maps in the Local Plan should be checked to make sure they all reflect this change.

Recommendation 3

Changes to Mitcham Policy N4.1

As already noted we wish to see Mitcham Village replace Mitcham Town Centre as the designation. This is pertinent to policy N4.1 and throughout the entirety of the Local Plan.

We are pleased to see – as noted above – that policy c for what we define as Mitcham Village now includes measures which support “the vision of a 20-minute neighbourhood”, as we recommended, and that this is repeated in the section of the policy covering the surrounding areas (point n).

However, we also wish to see policies which emphasise how the Mitcham Village character will be protected and enhanced.

Some policies are currently clearly counter to this. We are concerned about section of point d “mixed use developments with homes above shops in the town centre.” In principle we support this. We want to see it strengthened by including clarity on building height restrictions and clarity on design quality.

We want to see explicitly stated in the policy that:

- 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.*

Recommendation 4

Mitcham Policy Justification – 20-minute neighbourhood

It is disappointing that the first few points in the justification section are focused on the economy. Of course economic success is important. But the economy is one aspect of civic life, and Mitcham Village – as the Plan makes clear – is an aspirational 20-minute neighbourhood.

It is this characteristic which should lead the Justification, and that will mean an emphasis on cultural, social and environmental factors, on green and blue infrastructure, and on design, built form and the public realm as well as economic factors.

The justification should lead on the 20-minute neighbourhood aspiration, and all that follows should relate clearly to it.

Recommendation 5

Mitcham Policy Justification – Rediscover Mitcham

Point 4.1.3 fails to note that the Rediscover Mitcham investment promised public toilets and a rejuvenated market. Neither has been delivered. Both are vital to bringing people in to Mitcham Village and supporting the 20-minute neighbourhood aspiration.

This point should be revised to reflect the missing elements, and explain how these will be delivered.

Recommendation 6

Mitcham Policy Justification – footfall

Point 4.1.3 suggests that the changes made during the Rediscover Mitcham activity have created extra footfall. There is no evidence presented for this.

This point should be revised to include evidence for additional footfall created. It should include the ‘before’ and ‘after’ footfall survey data. If none exists, this point is disingenuous and should be removed.

Recommendation 7

Mitcham Policy Justification – active frontages

Point 4.1.6 asserts that ground floors of commercial developments need to be flexible in order to accommodate uses we might not associate with high streets. We agree that the nature of centres is changing, and that a mix of usages is required. We note that active, accessible frontages are flagged as important. However we do not feel the need for active frontages is asserted strongly enough. There is plentiful evidence – including within Merton – of shop fronts being turned into housing, removing active frontages.

It is important to assert strongly and emphatically that new development within Mitcham Village’s current shopping streets that removes an existing active frontage, or that creates non-active frontages in an area which is characterised by them, will be discouraged. This should be reflected in Policy N4.1 very clearly.

Recommendation 8

Mitcham Policy Justification – building height

Point 4.1.9 suggests that higher rise accommodate is “a contrast to the surrounding terraces and semi-detached houses.” The word ‘contrast’ is value free: a contrast can be positive or negative. We

only want to see new build that adheres to the strictest design code and is of height appropriate to its surroundings. In Mitcham Village this means no more than 4 storeys. We understand the need to create new homes, and the pressure Merton is under to deliver. We believe that new homes can be delivered alongside preserving character and ensuring the highest quality design requirements are met.

We note that elsewhere in the Local Plan Mitcham's Glebe Court is cited as a development which provides "architectural variety" (Policy D12.6 Tall Buildings, p408). Key characteristics of Glebe Court are that it is set back from London Road by landscaped gardens, that blocks are in an open, grassed and landscaped setting, and that even in the heart of the estate, there is a feeling of openness and space to breathe. These key design characteristics are central to providing density of homes, notably, but not only, in the context of providing the open space and green infrastructure that 20-minute neighbourhoods require.

Use wording that is not neutral – replace 'contrast' with more meaningful language.

Be clear on the need for local design codes and the need for development to do more to enhance their settings and surroundings.

Be clear that there are expectations on the design and height of new development within Mitcham Village.

Recommendation 9

Mitcham Policy Justification – green and blue infrastructure and public realm

There is no point in the justification specifically covering design, the importance of continuity, or the relationship of buildings to green and blue infrastructure or the public realm. This is a major failing and should be addressed. It is particularly important given the number of sites identified which could accommodate significant numbers of homes. Mitcham must not become a bland anyplace in the race to meet housing targets, and both the policy and the justification need to be clearer on this point.

While these matters are covered in other policies, we feel clear unequivocal commitments should be made in both policy N4.1 and the justification on:

- a. Green infrastructure
- b. Blue infrastructure
- c. Public realm
- d. Design quality and continuity

For the absence of doubt we reiterate the point made at the start of this submission. The Plan needs to address our recommendations for it to be considered sound.