

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA111220-1801

14 January 2021

Dear [REDACTED]

Thank you for your request for information which the GLA received on 11 December 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

*Please provide copies of all the representations received in relation to the Representation Hearing on 8 December 2020 into the development of Benedict Wharf, Mitcham (GLA reference GLA/4756) and a link to where these may be accessed publicly online*

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request.

Please note that some names and contact details are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]  
**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 15 December 2020 08:38  
**To:** Benedict Wharf  
**Subject:** As above!

I would like to say I oppose the change of residences to 850 at the above development!

My reasons are:-

In recent years the estate next to this area have taken down two blocks of flats and built maisonettes and houses for the residents due to the troubles in the area (two local pubs were also closed) I am concerned that living at the top of such a high block would be unhealthy in many ways including the emissions from the anaerobic digester from Beddington which did show the area where the emission would flow to. Mental health worse in today's world with the virus and generally loneliness. The local doctors will not be able to support so many new residents The Primary Schools ,there is only one on the door step not three as you have said two are Specialists Schools who t

[REDACTED]

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**From:** Mitcham Cricket Green Community & Heritage  
[REDACTED]  
**Sent:** 08 December 2020 23:36  
**To:** [REDACTED] Benedict Wharf  
**Subject:** Re: Benedict Wharf/Suez site

[REDACTED]

Thank you for addressing Councillor Pritchard's additional representations in the Addendum which was published. We regret that as a participant in the hearing we were not informed of the Addendum.

You have committed to providing copies of the representations received for the Representation Hearing "*in due course*". We cannot understand why it is not considered necessary to provide these ahead of the hearing. This is expected practice for a local planning authority and this is the role which the Mayor takes on when becoming the decision maker on the planning application. Please can you let us know when this information will be available.

We are also concerned that the Representation Hearing was not informed that this application is subject to a Holding Direction from the Secretary of State. This is material to the process and it means that the Deputy Mayor's decision is not yet binding. No observer of the process would have been aware of this unless they happened upon the Addendum. The GLA's lawyer had ample opportunity to make the Hearing aware or the Deputy Mayor could have done in his introductory remarks or summing up.

We appreciate the issues raised here relate to the wider process for the way the Mayor's decisions on planning applications are handled. It would be helpful if you could direct us to who is responsible for this as we are keen to both clarify them and help improve the process for lay and other participants in the future.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]



On 07/12/2020 09:17, Mitcham Cricket Green Community & Heritage wrote:

[REDACTED]

Many thanks for getting back.

We do not share your view on the significance of Councillor Pritchard's written representations and how they have been handled. It is essential for all representations sent direct to the Mayor to be recorded as such. It is an indication of the strength of feeling which is pertinent to the decisions. It is also significant that since Councillor Pritchard made his original representations he has become Deputy Leader of Merton Council. This provides helpful context given the representations made by the Leader. Your treatment of Councillor Pritchard's representations is also inconsistent with the way in which Siobhain McDonagh

MP's have been treated - these are referenced in both paragraphs 78 (original representations) and 91 (representations to the Mayor).

We also ask whether you are content that the brief paragraph 95 summarising our supplementary representations, including the independent critique by Create Streets is adequate. The reader has no sense of the detail or merit of our work and the document then devotes 70 pages of analysis of the planning issues raised without once referencing the points that have been made.

In this role the Mayor (or his Deputy) is taking on the role of local planning authority. This brings with it responsibilities to act like a local planning authority, including making public all representations that have been received ahead of a Representation Hearing. If this is not yet normal practice for this process then we ask for your urgent consideration that it should be and confirmation that permanent changes have been made.

Thanks

[REDACTED]

[REDACTED]  
[REDACTED]



On 03/12/2020 14:38, [REDACTED] wrote:

Hello [REDACTED]

Thanks for your email and request for copies of the direct representations received.

I can confirm that representations were received from all of those listed on the Representation Hearing Agenda, as well as Councillor Owen Pritchard and the letter from the outgoing and new Leader of Merton Council. So six respondents in total.

I will ask our admin team to publish these responses in due course; however, the personal information will need to be redacted first due to the Data Protection requirements.

In terms of the report, the representation received from Local Councillor Owen Pritchard is identical to the representation received on the amended scheme, which is mentioned at paragraph 79 of the report. This was also the case for the representation received from MP Siobhain McDonagh who is speaking at the Hearing. It is for that reason that these objections were not repeated in the report, given that the points raised are covered in the consultation response section of the report (covered in para 78 ad 79). I think the report does convey the representations and objections raised by yourself on the original and revised application at paras 75 and 76.

The procedure for public hearings can be found here:

[https://www.london.gov.uk/sites/default/files/interim\\_mayoral\\_rep\\_hearing\\_procedure\\_-20th\\_july.pdf](https://www.london.gov.uk/sites/default/files/interim_mayoral_rep_hearing_procedure_-20th_july.pdf)

I'll let you know when the information referred to above is available and please ask if you have further questions on the hearing itself.

Thanks

[REDACTED]

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**From:** Mitcham Cricket Green Community & Heritage

[REDACTED]

**Sent:** 03 December 2020 00:03

**To:** Benedict Wharf <[BenedictWharf@london.gov.uk](mailto:BenedictWharf@london.gov.uk)>; [REDACTED]

[REDACTED] [london.gov.uk](mailto:london.gov.uk)

**Subject:** Fwd: Benedict Wharf/Suez site

[REDACTED]

We have reviewed the report prepared by officers ahead of the Representation Hearing on the plans for Benedict Wharf next week.

May we ask why the direct representations from our ward councillor and Deputy Leader of Merton Council (below) Owen Pritchard objecting to the plans are not included in the report while representations from the outgoing and new Leader of Merton Council Stephen Alambritis and Mark Allison in support of the plans are included? Only Councillor Pritchard's representations on the original plans are cited.

We find the report's handling of our own direct representations in paragraph 95 brief to the point of being meaningless in conveying the content and detail of our concerns and the supporting evidence we have provided.

It would also be helpful if we had been notified of this information and the details of who is speaking. We could have been unaware of it being online. We would welcome further information on how the Hearing will be run.

Thanks

[REDACTED]

[REDACTED]

Secretary



----- Forwarded Message -----

**Subject:** Benedict Wharf/Suez site

**Date:** Mon, 23 Nov 2020 10:06:42 +0000

**From:** [REDACTED]@local.gov.uk>

**To:** [BenedictWharf@london.gov.uk](mailto:BenedictWharf@london.gov.uk) <[BenedictWharf@london.gov.uk](mailto:BenedictWharf@london.gov.uk)>

Good morning,

I am emailing you on the issue of the proposed development of 850 homes on the Benedict Wharf/Suez site in the ward I represent, Cricket Green.

I am a councillor for that ward and would like to submit a letter of comment.

I recognise wholeheartedly the need for those in local and central government to build homes in Merton, in London, and across the UK. I also agree with the repurposing of the site from its current commercial/industrial usage to residential. It would provide many much-needed homes and – if done correctly - enhance Mitcham as a community and a place. In truth, had this proposal remained for a development of 600 homes or even 650, my only concerns would be on issues of aesthetics, design, and layout.

But the situation has changed. The new proposal – for 850 homes and 10 storey buildings – is a mistake. It will alienate the existing community, detract from the sense of place that the Cricket Green conservation area brings, create further congestion and air quality problems, and would not provide top quality homes.

600 homes were far closer to the optimal development of this site than 850. I say this because optimisation is about more than just density; it's about building homes that you yourself would want to live in; neighbourhoods that are places and not just houses. Our aspirations – like those of our residents – should be about more than high rises, cramped living, and the creation of estate dormitories. We must create a civic and community legacy that, in a quarter of a century, everyone involved will be happy to point to as something they contributed to, and the residents will still be happy to live in.

Thank you and best wishes,

Councillor Owen Pritchard  
Cricket Green Ward

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 December 2020 17:58  
**To:** Benedict Wharf  
**Subject:** As above!

I am in opposition to the addition of residence on this planning Application My reasons are :  
It is too high to fit in with the surrounding area it is a Conservation area as you know. The height may take the emissions from the anaerobic digester from the Beddington Lane site as we had been shown the expected fall out and it seemed to flow to MITCHAM.  
MentalHealth is a worry in today's world let alone when we didn't have a virus, loneliness being just one of them, the local Doctors are not big enough to take such a lot of new patients. In recent years two blocks of flats were knocked down to make way for houses and maisonettes, the two pubs also were closed because the area had so much trouble, today we are still having a certain amount of troubles this shouldn't be exacerbated You said there were three Primary Schools locally, infact two of those you mentioned were Specialist Schools and take pupils from a wide surrounding area.  
I have lived in two areas of MITCHAM in some of my life having reached three score years and ten plus a bit more I would like you to think about our area and that perhaps you wouldn't like to look back on your life and say "did I really think that was a good design ".?  
I support the opposition from MITCHAM Cricket Green Conservation and MITCHAM Society.

[REDACTED]



[REDACTED]

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**From:** Mitcham Cricket Green Community & Heritage  
[REDACTED]  
**Sent:** 02 December 2020 08:57  
**To:** Benedict Wharf [REDACTED]  
**Subject:** Re: Benedict Wharf Representation Hearing - additional representations

This is to request copies of all the written representations which have been received by the Mayor regarding the Benedict Wharf proposals and to ask if you can confirm that they will be made publicly available online ahead of the Hearing.

Thanks

[REDACTED]  
[REDACTED]  
Secretary



On 26/11/2020 13:32, Mitcham Cricket Green Community & Heritage wrote:

We hope it is helpful to have these additional representations. They examine the process through which the Benedict Wharf proposals have emerged to help explain why they have ended up as being unacceptable to the local area.

Thanks

[REDACTED]  
[REDACTED]



On 23/11/2020 14:07, Mitcham Cricket Green Community & Heritage wrote:

We are pleased to attach our representations for the Mayor's Representation Hearing on the proposals for Benedict Wharf. This includes an independent critique of the plans commissioned from Create Streets.

Our verbal representations at the Representation Hearing next month will address

the content of these written representations.

It would be helpful if you could confirm receipt and the arrangements for the afternoon.

Thanks



On 18/11/2020 09:09, Mitcham Cricket Green Community & Heritage wrote:

This is to confirm we would like to speak as a main objector to the proposals for Benedict Wharf at the Representation Hearing.

We will be providing further representations shortly.

Thanks



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 November 2020 17:59  
**To:** Benedict Wharf; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Benedict Wharf Hearing

Good afternoon [REDACTED]

Further to our previous discussions, I write to confirm that I would like to speak on behalf of the applicant at the Benedict Wharf Hearing on 8 December. I will also ensure that relevant technical specialists relating to matters such as the HTVIA, Architecture and Design and Transport are available to answer any direct questions.

I intend to express that the application should be approved, on the basis of the following significant positive impacts:

- . the provision of 850 new deliverable high quality homes on a sustainably located and brownfield site within 100 metres of station, in accordance with the allocation in the emerging Local Plan;
- . 35% affordable housing (298 homes) supporting the Mayors ambition to deliver affordable homes. This exceeds the delivery of affordable housing in Merton for the last four years combined and contributes towards reducing the significant affordable housing need in Merton and Mitcham.
- . economic - Significant job creation during remediation and construction, Merton Community Infrastructure Levy (CIL) payments of approximately £7.5 million, including 15% (£1.125m) for neighbourhood projects such as improvements to community facilities. Mayoral CIL payments of approximately £2.8 million, supporting the provision of transport infrastructure. Also, an additional £4 million of residential expenditure, which would be retained in Merton, supporting local businesses and services;
- . environmental improvements – comprehensive redevelopment and remediation of an old waste and industrial site to a new neighbourhood with significant urban greening and public recreational space;
- . traffic - reduction in vehicle movements, almost complete elimination of heavy good vehicles and improvements to the capacity of the number 200 bus route;
- . connecting neighbourhoods and supporting sustainable travel – provision of new routes through the site linking London Road Playing Fields to Belgrave Walk and Morden Hall Park. Improvement of footpaths and cycleways, prioritisation of pedestrian and cycle movement through the adoption of home zone standards and provision of new pedestrian and cycle infrastructure connecting with existing routes;
- . Facilitating increased waste management capacity in South London contributing to the Mayors strategy for waste and recycling and delivering the strategy in the emerging South London Waste Plan.

Please let me know if you require any further information in advance of the hearing.

Thanks,

[REDACTED]  
[REDACTED]  
**Recycling and recovery UK**  
[REDACTED]

**From:** MCDONAGH, Siobhain <siobhain.mcdonagh.mp@parliament.uk>  
**Sent:** 25 November 2020 11:23  
**To:** Benedict Wharf  
**Subject:** RE: Notice of Representation Hearing – 8 December 2020  
**Attachments:** Letter to Mayor of London - Planning Application Benedict Wharf.pdf

Dear Mr Finlayson,

Further to my previous email, please find below the issues I would like to raise at the hearing. Also, I have a prior commitment I am unable to change at 15:30 on the 8<sup>th</sup>. Would it be possible for me to speak before that time? I understand that the session begins at 14:00.

I am concerned about the density of the site. Originally this application was for 600 properties, now increased to 850.

My long-term ambition for the site is the redevelopment of the Phipps Bridge Estate, where the former tower blocks were demolished in the 1990s. I am keen not to be replacing what we took down 30 years ago.

I recognise and appreciate the tension between the need for properties and the appropriateness for the people who most need them.

Yours sincerely,

Siobhain McDonagh

**Office of Siobhain McDonagh MP | Labour Member of Parliament for Mitcham and Morden**  
0207 219 4678 | [siobhain.mcdonagh.mp@parliament.uk](mailto:siobhain.mcdonagh.mp@parliament.uk) | House of Commons, London, SW1A 0AA

**Follow Siobhain on Twitter:** @Siobhain\_MP

**Follow Siobhain on Facebook:** [www.facebook.com/SiobhainMcDonagh1](https://www.facebook.com/SiobhainMcDonagh1)

**Follow Siobhain on Instagram:** [siobhainmcdonagh](https://www.instagram.com/siobhainmcdonagh)

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**From:** MCDONAGH, Siobhain  
**Sent:** 23 November 2020 19:09  
**To:** [benedictwharf@london.gov.uk](mailto:benedictwharf@london.gov.uk)  
**Subject:** RE: Notice of Representation Hearing – 8 December 2020

Dear Mr Finlayson,

I would like to put my name in to speak on 8<sup>th</sup> December. Please let me know what further information you need from me in order to do so.

Many thanks,

Siobhain McDonagh

**Follow Siobhain on Twitter:** [@Siobhain\\_MP](https://twitter.com/Siobhain_MP)

**Follow Siobhain on Facebook:** [www.facebook.com/SiobhainMcDonagh1](https://www.facebook.com/SiobhainMcDonagh1)

**Follow Siobhain on Instagram:** [siobhainmcdonagh](https://www.instagram.com/siobhainmcdonagh)

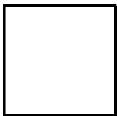
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**From:** Greater London Authority <[greater.london.authority@notifications.service.gov.uk](mailto:greater.london.authority@notifications.service.gov.uk)>

**Sent:** 18 November 2020 12:02

**To:** [REDACTED] <[\[REDACTED\]@parliament.uk](mailto:[REDACTED]@parliament.uk)>

**Subject:** Notice of Representation Hearing – 8 December 2020



Dear Sir/Madam,

We are sending a new letter to you which corrects a mistake in the letter that incorrectly listed Hillingdon instead of Merton as the Council.

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.**

**Land at Benedict Wharf, Hallowfield Way, Mitcham**

GLA reference: GLA/4756

Merton Council reference: 19/P2383

Notice of Representation Hearing: 8 December 2020

I am writing to you as you have previously made written representations about this planning application, either to the Council or the GLA.

The Mayor has decided to act as the local planning authority for the purposes of determining the application, following a direction

**Siobhain McDonagh MP**

House of Commons  
London SW1A 0AA  
020 7219 4678 (tel)  
*mcdonaghs@parliament.uk*

Mr Sadiq Khan  
Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

28<sup>th</sup> July 2020

Dear Mr Khan,

**RE: Development at Benedict Wharf - 19/P2383**

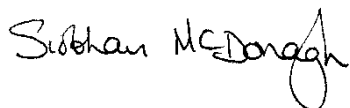
I am writing regarding LPA case number 19/P2383 which has been referred to you for consideration.

Having reviewed the proposals, I am concerned about the density of the site. Originally this application was for 600 properties, now increased to 850.

My long-term ambition for the site is the redevelopment of the Phipps Bridge Estate, where the former tower blocks were demolished in the 1990s. I am keen not to be replacing what we took down 30 years ago.

I recognise and appreciate the tension between the need for properties and the appropriateness for the people who most need them.

Yours sincerely,



**Siobhain McDonagh MP**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 November 2020 20:35  
**To:** Benedict Wharf; Benedict Wharf  
**Cc:** [REDACTED]  
**Subject:** Re: Notice of Representation Hearing – 8 December 2020  
**Attachments:** Benedict Wharf Mitcham - GLA 4756\_ Merton 19P2383 - Mayor Representation Hearing Detailed Statement - v1.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

**Benedict Wharf Mitcham - Outline application for 850 homes**

**Detailed Statement for Mayor of London's Representation Hearing on 8<sup>th</sup> December 2020**

**GLA reference GLA/4756**

**Merton Council reference 19/P2383**

Please find attached my detailed statement for the above hearing on the 8<sup>th</sup> December.

I have not produced one before and could not find any examples of other such statements, so my apologies if this is not quite what you required.

Kind regards,

[REDACTED]

[REDACTED]

----- Original Message -----

**From:** [REDACTED]  
**To:** benedictwharf@london.gov.uk; BenedictWharf@london.gov.uk  
**Sent:** Thursday, 19 Nov, 2020 At 14:45  
**Subject:** Re: Notice of Representation Hearing – 8 December 2020

Dear Sir/Madam,

Thank you for the information below. I would like to speak at the meeting on the 8th December but I have not yet prepared my detailed statement. I am an objector and do not represent any organisation.

Kind regards,

[REDACTED]

----- Original Message -----

From: "Greater London Authority" <greater.london.authority@notifications.service.gov.uk>

To: [REDACTED]

Sent: Tuesday, 17 Nov, 2020 At 18:19

Subject: Notice of Representation Hearing – 8 December 2020



Dear Sir/Madam,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.**

**Land at Benedict Wharf, Hallowfield Way, Mitcham**

GLA reference: GLA/4756

Hillingdon Council reference: 19/P2383

Notice of Representation Hearing: 8 December 2020

I am writing to you as you have previously made written representations about this planning application, either to the Council or the GLA.

The Mayor has decided to act as the local planning authority for the purposes of determining the application, following a direction issued under Article 7 of the Town and Country Planning (Mayor of London) Order 2008.

A public Representation Hearing is due to be held virtually on 8 December 2020, starting at 14:00, for the Mayor Sadiq Khan to consider this application in detail and to determine whether or not outline planning permission should be granted.



## Benedict Wharf, Mitcham - Additional representations for Mayor of London's representation hearing on 8 December 2020

26 Nov 2020

Create Streets believes there are a number of 'levers' that have contributed to creating a development that fails to align itself both with future vision of Mitcham and its history. The four factors set out below, we believe, are ultimately responsible for this and have led to a poorly designed proposal.



*The 'levers' to failure*

1. **Policy Led.** The interpretation of policies have contributed to jeopardising the future prosperity of Benedict Wharf:
  - a) *Draft London Plan 2017 Policy D6 'Optimising housing density' Part A.* To make the most 'efficient use of land' the applicant has focused too heavily on looking upwards.
  - b) *Draft London Plan 2017 Policy D6 'Optimising housing density' Part C.* The requirement for hitting up to 240 units per hectare in areas of PTAL 2 to 3 has resulted in a high-rise scheme.
  - c) *Draft London Plan 2017 Policy T6.1.* Even though the proposal has actively set out to minimise the number of parking spaces, recommended requirements have influenced the need for unsightly podium parking areas.
2. **Numbers-led.** The process has prioritised a numbers led approach to design of the development rather than an urban design led approach. The increase in homes from 600 to 850 has resulted in the proposal that fundamentally conflicts with the character and appearance of Mitcham and will result in a physical and social divide between new residents and old.
3. **Ignored communities.** The failure to properly engage with the people of Mitcham has been detrimental to the mistakes made around the design. *All but one of the drop-in sessions were held prior to the second outline application.* While the process ignored ongoing concerns around the high-rise properties from the start.
4. **No centre.** The future Sutton Tram link would create a transport intersection at Benedict Wharf. Wherever transport routes intersect people will gather and meet. The existing design does not account for this in its current form as primarily housing.
  - a) *Where's the heart?* Only 750 square metres of non-residential uses at the edge of the site (furthest away from the potential tram intersection) is inadequate.
  - b) *A park that does not connect.* High voltage pylons and land ownership issues put into question whether Linear Park can fulfil its role as a 'connector' to the important transport links or indeed whether people will want to spend time there.

These four factors are what we believe to be the key 'levers' that have contributed to the poor design of Benedict Wharf, Mitcham. But this does not have to be the case. Our Critical Friend review has set out a series of design recommendations that will better aligned Benedict Wharf with both its future and past, creating a more popular and prosperous place.

**CREATE Streets**

## Gentle density or not?

*Benedict Wharf 'critical friend' review and next steps suggestions, November 2020*

### 1. Executive Summary

Despite many fine principles and some key strengths, the proposals in their current form do not reflect the events of 2020. They sadly risk creating not the “traditional streets” responding to “local character areas” which are sensibly promised in the Design and Access statement but a series of dark, overly-enclosed alley-like spaces with “industrial” facades punctuated by thoroughly un-London “entrance plazas”, “gateways” and “landmark” towers. It is right to create many homes and many affordable homes here. However, this site has been over-packed for a location with a PTAL of 1b to 3<sup>1</sup>. Nor does this design reflect the post-COVID market shift away from small flats in huge buildings and with no private gardens. A more finely-grained approach, more sensitively attuned to London’s historic pattern of ‘gentle density’ would create very nearly as many homes without being so discordant with the surrounding suburbs. This approach would be more popular, better-attuned to post COVID market-demand, more in keeping with Mitcham’s history, better aligned with future resident well-being and less likely to create a physical and social divide between new residents and old. Appropriate ‘gentle density’ this is not, particularly in the post-COVID context.

Here are some suggested actions better to tie in the design with the evidence on healthy popular places and with the surrounding neighbourhoods or more honestly to reflect what it actually is. We have categorised our comments at three scales from the big picture (or ‘Bird’s eye’ view) to the closely observed scale (or ‘Child’s eye’ view).

#### *Bird’s eye view – Beyond the red line*

- *Ultimately, community preferences have been ignored.* Although there was much energy put into community activity early in the process, this appears to have fizzled out and, ultimately, to have been ignored. All but one of the drop-in sessions were held prior to the second outline application. There has been insufficient community engagement from the evolution of the first design of 600 homes to the subsequent design with 850 homes.
  - 42 per cent of all respondents stated the desire to see ‘low/medium rise housing’ featured at Benedict Wharf in the opening session.
  - In a wider survey by Merton Council, 1,085 of the 2012 respondents (54 per cent) considered terraced housing as the most successful form of housing within the area, followed by lower flatted housing (38 per cent).
- *Either change the design or be honest – this does not ‘fit in’.* Although the Design and Access Statement and the Design Code reference the surrounding streets and their horizontal, vertical and detailed components, the introduction of the ‘industrial character’, the proposed scale, height and enclosure ratios, the ‘landmark’ buildings and the ‘gateways’ of the proposed streets do not reflect this study meaningfully. We would recommend a more organic and ‘finely-grained’ framework of narrower streets and shorter buildings (7 storeys maximum) with a more textured façade pattern. If this is not

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<sup>1</sup> Though we recognise this may improve.

possible then the intelligence of local people should be respected. What is proposed is a mix of Singapore (without the sun) and Shoreditch (without the connectivity, commercial space or textured facades).

- *Mix it up and catch up with COVID.* The development risks creating a housing dormitory if it does not incorporate a more varied mix of other uses within the design. The site should integrate more of a mix of flexible spaces which can serve as retail, commercial or community uses. We understand and recognise that retail and commercial valuations in city centres are difficult right now but, conversely there is growing interest in flexible space nearer homes. The proposed use classes do not reflect this. This is also a pre-COVID masterplan. Although we have not found a GIA, this is predominantly a series of small flats with no private gardens in very large buildings. This not reflect the emerging post-COVID market shift to larger homes with more readily accessible green space.

#### *Human's eye view – Site layout*

- *Create Gentle Density.* We would challenge the appropriateness of such high housing numbers for such a small and constrained site. Using a more humanised 'gentle density' scale of nearer 150 to 180 homes per hectare over a slightly higher portion of the site could create up 650 homes.
- *Quality over quantity.* Despite the lovely images, land ownership issues and high voltage pylons restrict the Linear Park from creating enjoyable public space. More focus should be put on more and smaller green spaces. The communal courtyards, public amenity spaces and Boulevard will be the places where people congregate and come together.
- *Rethink the podium parking.* The use of podium parking will be detrimental to creating a place. Where you must have parking, and we would challenge the current quantity considering the proximity to public transport and the government's commitment to carbon net neutrality by 2050, consider underground parking garages.
- *Get enclosure ratio right if you want streets not canyons.* Enclosure ratios in areas such as the Garden Quarter are apparently set to be about 1:0.7. We suspect they may end up tighter than this. We recommend a maximum height to width ratio of 1:0.85, otherwise spaces and streets tend to be darker, more windy, colder less used and less popular.

#### *Child's eye view – Street design*

- *The path and cycleway in the linear park is anything but linear.* Pedestrians and cyclists on their way to the tram stop will be looking for a direct route on the desire line, not an unnecessarily meandering path. The currently proposed path will either be ignored or avoided
- *Humanise the streets even more.* Streets within the development should be shared surfaces, particularly the Boulevard, using design features that make cars the 'guest'. There are many good principles and practices in the design but we think there could be even more.

## **2. Context**

### **2.1 Research undertaken**

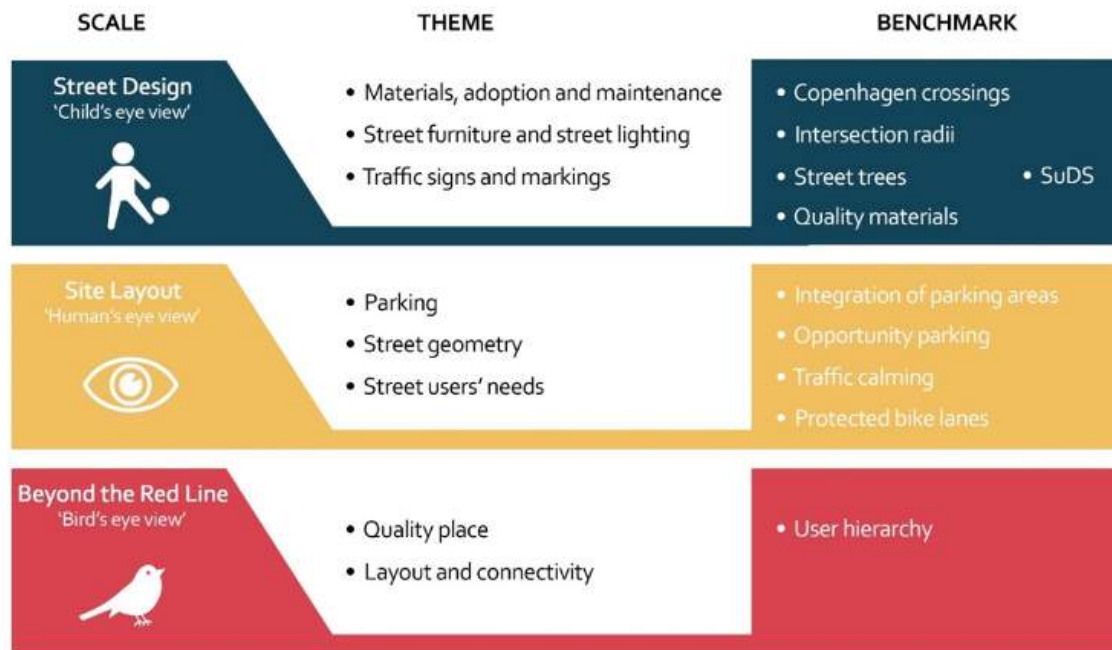
Our review is based on a desk analysis of the following documents:

- *Benedict Wharf Framework Design Code March 2020*
- *Benedict Wharf Design & Access Statement February 2020*
- *GLA Stage 1 Response Letter September 2020*
- *Design Review Panel Notes of Meeting January 2019*
- *Feedback Summary Report Introduction Drop-in Workshop 1 December 2018*
- *Design review panel notes of meeting – 31 March 2020*
- *Benedict Wharf, Mitcham Savills Benedict Wharf – 19/P2383 Applicant*
- *Arboricultural Impact Assessment SUEZ Recycling and Recovery UK Limited February 2020*
- *Response to DRP Comments on the submitted Design Code*
- *Daylight, Sunlight, Overshadowing Impact & Overshadowing Self-test Assessments February 2020*
- *Community Design Workshop February 2019.*
- *Statement of community involvement June 2019*
- *Merton Council Sustainable Communities Overview and Scrutiny Panel 2 November 2020*
- *Benedict Wharf Design & Access Statement June 2019*

## 2.2 Our approach

This 'critical friend' review of the Benedict Wharf planning application makes use of our and others' research on (i) correlations between design with sustainability at level of building, place and location; (ii) correlations between design with resident wellbeing, (physical and mental health, physical activity, neighbourly connectedness and likely pro-social behaviour); and (iii) correlations with long term value. Appendix one sets out a very high-level summary of some of these from our recent book, *Of Streets and Squares*. Our research takes account of issues of deliverability, planning process, evolving highways rules and best practice (Healthy Streets etc).

Our report is structured around Create Streets' simple 'three eyes' assessment framework, which allows us to cover most of the research into relationships between design and human behaviour. This 'three eyes' assessment framework lays out in detail how streets and developments should be assessed in order to improve the quality and walkability of the area.



*Our 'three eyes' assessment framework*

### 2.3 Site and Planning Context

- The site is in Mitcham in South West London. South of Hallowfield Way, it is 3.8 hectares, of which only 3.2 hectares is being built on. It currently comprises a waste management facility owned by SUEZ (applicant), with a number of buildings across the site.
- In 2019, an outline application for 600 residential units and 500sqm of non-residential floor space was submitted. Following consultation with the GLA who considered that this figure did not optimise the housing potential of the site or allow for the provision of sufficient affordable housing the figure was increased to 850 homes.
- In 2020, a revised application for outline planning permission was made and refused by Merton Council. The plans have since been referred to the Mayor of London who has determined he will make the planning decision.

### 3. Key strengths

The existing planning application has a number of strengths and is getting some of the fundamental elements of urban design right. Amongst these are;

- The use of perimeter blocks (for the most part) with safely enclosed community gardens within;
- The planting of regularly spaced trees throughout, particularly along certain streets, such as the boulevard;

- The creation of new green space in the Linear Park which will support local health and psychological well-being;
- The creation of a higher density streets than the surrounding streets is right given access to public transport and local centres (PTAL of 1b to 3) although see the points below;
- The study of local character and materiality is good although see points below on 'follow through';
- The Conservation Edge character area integrates well with the existing Hollowfield Way and Church Path;
- The desire to reduce overall parking requirements to a ratio of 0.3 per home is commendable owing to the proximity of the tramlink, bus station and potentially the future Sutton Link route. This should go further however; and
- 'Baron Walk', the pedestrian priority route, creates an attractive and pleasant boundary onto the highly sensitive London Road Playing Fields.

#### 4. Bird's Eye View

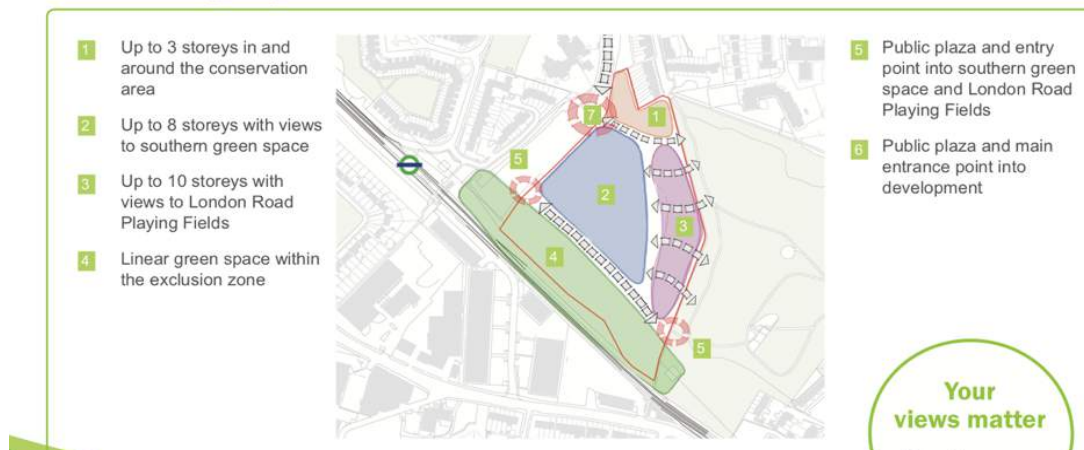
##### 4.1 Consulting not engaging -ultimately community preferences on designs and building heights have been ignored

Although we welcome evidence of community engagement from early 2018 to 2020, we question whether the key community feedback has been lost in relation to the current application.

Good community engagement is a process in which community members are able to, without prompt or steer, express freely their views, concerns and dreams about an area. For Benedict Wharf much of the process seems consultative rather than pure engagement.

For engagement to be successful, especially at the earliest stages, it must not be delivered in a manner that steers or influences individuals towards a certain direction. The earliest examples of engagement failed to do this. Prior to the first workshop, the applicant had already provided a 'Concept Plan' of up to 10 storeys without even speaking to the general public.

### Concept plan





*Concept plan or finished proposal? – the early sketches of the development largely reflect what is proposed now*

Comprehensive evidence around preferences for lower rise properties has long been established within the wider area. An engagement exercise in Merton, undertaken by Merton Council highlighted this. In this case, 1,085 of the 2,012 people (54 per cent) who answered considered terraced housing as the most successful form of housing within the area, followed by lower flatted housing (38 per cent). Taller flatted housing was voted least desirable with just 7 per cent of the vote.



*A clear preference from the community*

This preference for low-rise homes, along with concerns around a high-density scheme were continually voiced from the start and largely ignored:

- *First public drop-in workshops November/December 2018.* During this opening workshop 42 per cent of all respondents stated the desire to see 'low/medium rise housing' featured at Benedict Wharf. This was the most popular choice out of all characteristics available. No other typology preference appears to have been selected.
- *Community Design Workshop February 2019.* Medium density options (up to 7 storeys) were positively received while higher options were described as 'Far too high in terms of buildings'.
- *Public drop-in workshops March 2019.* Respondents agreed that eight storeys was still too high compared to the surrounding context.
- *Drop-in event January 2020.* The most popular response to a question asking for comments about the masterplan was the concern for building heights and their compatibility with the surrounding context. This point raised twice as many times as the next closest comment.

Does this really reflect a fair and proper approach to community engagement? Furthermore, all but one of the sessions (drop-in event January 2020) were held prior to the second application, in which building heights were increased considerably.

*Draft recommendation: Engage often and for a reason.* Community engagement should not be seen merely as a box ticking exercise but rather a vital cog in defining and shaping the nature of a development. Throughout the consultation process residents outlined preferences for low or medium housing and were continually ignored. We recommend amending designs to reflect the community engagement already undertaken.

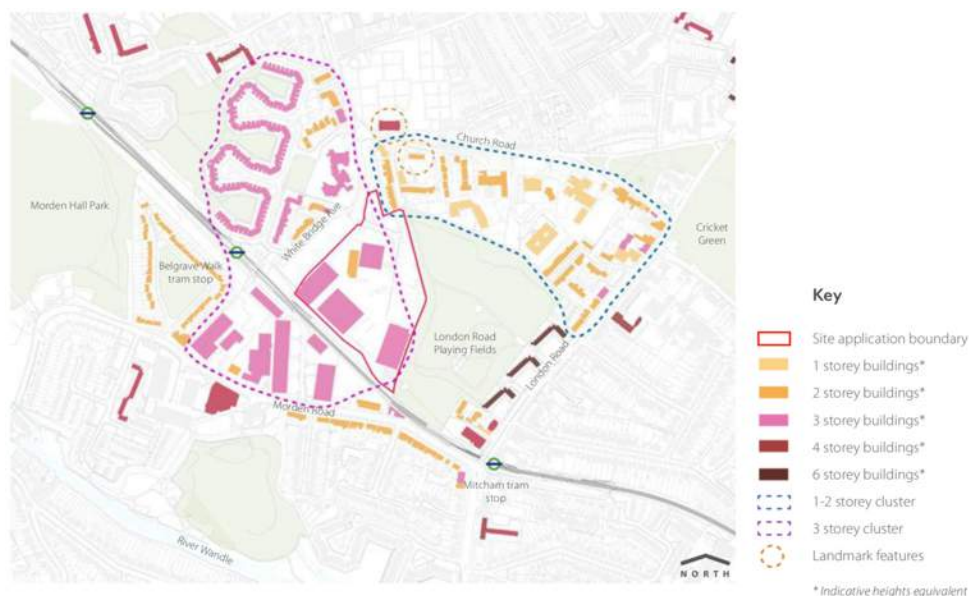


#### 4.2 Either change the design or be honest – this does not 'fit in' with the surrounding environment.

**Building Heights.** The language within both the Design and Access Statement and the Design Code acknowledge the importance of the existing built form within the wider area.

*'The proposed building heights in the masterplan seek to respond positively to the existing context'*

However, the proposals do not do this. Other than the Conservation Edge character area, which makes some reference to the terraced homes along Church's Street, the rest of the development fails to respect this point.



*Mitcham – A low and mid-rise neighbourhood*

**Materiality and appearance.** A similar issue arises when reviewing the appearance of the buildings.

*'These character areas will comprise of contemporary architecture that will celebrate the existing historic character of Mitcham and Benedict Wharf.'*

Despite this claim, only one of the five-character areas (the Conservation Edge Character Area) makes any reference to the surrounding architecture within the Design Code. In fact, the Design And Access Statement introduces a new non-local character, the Industrial – this has more influence but at much greater scale and with none of the composed complexity of the historic examples cited. Overall, the proposed scale, height and enclosure ratios, the 'landmark' buildings and the 'gateways' of the proposed streets do not reflect the local character study meaningfully. In particular, the studies on detail are utterly ignored. Character Areas claim to be contemporary 'Georgian' and 'Victorian' architecture. But shorn of detail and hierarchy and traditional ratios this is verbal legerdemain.



*Georgian? No. Either change it or don't pretend*

The development needs a more organic and 'finely-grained' framework of narrower streets and shorter buildings (seven storeys maximum) with a more textured façade pattern.

**Draft Recommendation. Create LEGO not DUPLO.** One recommendation would be to expand the use of low and mid-rise terraced homes to a greater area across the site, particularly the sensitive boundary towards the London Road Playing fields. This would permit more narrow streets and a more textured, less lumpy range of blocks and plots – LEGO not DUPLO.

Using mid-rise courtyard blocks with a more consistent height could achieve densities from 140 homes to around 220 homes per hectare (as opposed to the 265 homes per hectare in the current proposal). This would be more appropriate for this quite low PTAL site.

|    | Description (example area in London)                      | Storeys | Homes/hectare | Habitable rooms/hectare |
|----|---|---------|---------------|-------------------------|
| 1. | Terraced houses (Victorian/suburban e.g. Wandsworth)      | 2-3     | ~50           | ~250                    |
| 2. | Terraced houses (Georgian format e.g. Kennington)         | 4-5     | ~75           | ~300                    |
| 3. | Terraced houses plus a few flats (e.g. Notting Hill)      | 4-5     | ~100          | ~300                    |
| 4. | Mixture of flats plus some terraced houses (e.g. Pimlico) | 4-6     | ~175          | ~525                    |
| 5. | Terraced flats (e.g. Ladbroke Grove)                      | 5-7     | ~220          | ~600                    |

*High density medium rise <sup>2</sup>*

**Draft Recommendation. Keep heights more consistent.** Terraced homes are just one of the options available. Courtyard blocks can also be a fine solution. However, by using consistent heights throughout the development you should be able to reduce some of the 9 and 10 storey buildings to 6 or 7 storeys,

<sup>2</sup> Boys Smith et al. (2016) *Heart in the Right Street*, p 64.

enabling a more desirable enclosure ratio across the development. By increasing heights slightly on the three storey mews we may prevent the need for 10 storey towers.

We recommend the proposal finds a more consistent range of heights and sticks to it. We recommend a development that does not fluctuates more than three storeys between its largest and smallest building with a maximum height of up to 7 storeys. This could mean reducing the height of the larger buildings, but equally increasing, gently, the Mews and Conservation Edge character areas, to preserve densities.

*Draft Recommendation. Make the façade engaging.* Active or engaging facades are almost always more popular. From encouraging slower traffic to increasing a sense of belonging, the benefits are wide reaching. Places that 'could be anywhere', however are the opposite. If the applicant is inspired by Georgian architecture then they should reflect that properly within the design, not necessarily copying it but capturing its qualities of 'variety in a pattern' and 'complex composure'.

*Create mansard roofs with more dignity.* The contemporary Georgian buildings fronting the London Playing Fields would benefit from mansard roofs with improved proportions. Either a single storey extension or a pitch which would softens the vertical appearance in an area highly sensitive area



*Engaging and beautiful facades*

#### *4.3 Mix it up and catch up with COVID. The lack of mixed use throughout the site risks undermining the prosperity of the development*

The current proposal underestimates the importance of mixed use across the site. Only a small area within the conservation edge character area has been earmarked for non-residential purposes. 750 square metres of non-residential uses will be provided for the 850 homes development. There is uncertainty within the document as to whether the developer will even be required to supply this:

*"The proposed floorspace area for non-residential uses is merely indicative. The total area and the type of non-residential use will be defined by the market and viability assessment and current policy at the time of applying for the specific Reserved Matters Application".*

There is a risk Benedict Wharf will become a housing dormitory not a place. Textured mixes of different land uses are nearly always more successful. Research has found that 'richness of land uses' influenced the perceived 'scenic-ness' of a street of square almost 60 per cent more than the average of all urban elements studied<sup>3</sup>. They attract more people and generate more diverse and engaging environments.

Beyond the obvious benefits, they also encourage more walkable environments and are associated with lower car use. For example, a study, which rated high walkability by greater land use mix, higher street connectivity and high population density, found that residents took the equivalent of an additional one to two 13-15 minute walks per week.<sup>4</sup> There is high chance that this development will become a key transit interchange, the ideal location for a local centre.

We understand and recognise that retail and commercial valuations in city centres are difficult right now but, conversely there is growing interest in flexible space nearer homes. The proposed use classes do not reflect this.

This is also a pre-COVID masterplan. Although we have not found a GIA, this is predominantly a series of small flats with no private gardens in very large buildings. This not reflect the emerging post-COVID market shift to larger homes with more readily accessible green space.

*Draft recommendation: Do not waste a good boulevard.* The boulevard is crying out to be better used. Not only does it provide links across the site but it also creates a pedestrian friendly environment for residents to enjoy. Despite these points, the area is completely residential. We recommend more of a mix of flexible spaces which can serve as retail, commercial or community uses in an uncertain future in which we will be working from home more even when COVID has receded. This can also attract the wider local public into the site helping to break down what will undoubtedly be a sharp physical divide between the old and the new.

*Draft recommendation: is this masterplan dated before it is built?* This series of small flats with no private gardens in very large buildings does not reflect the emerging post-COVID market shift to larger homes with more readily accessible green space. A less aggressive masterplan with more terraced and smaller blocks would permit a far higher percentage of future residents to have immediate access to private gardens or much nearer access to communal gardens shared with fewer neighbours. Would this not be more viable for the developer?

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<sup>3</sup> Cited in Boys Smith et al. (2019) *Of Streets and Squares*, p6

<sup>4</sup> Sallis, J. F., et al., (2004). *Active transportation and physical activity: opportunities for collaboration on transportation and public health research.*





*Creating boulevards in outer Paris with tight enclosure ratios and mixed use*

## 5. Human's Eye View

### 5.1 Create Gentle Density

Getting density and scale right is fundamental to building great spaces. Research has found that 'built up area density' is one of the key influences in defining 'scenic-ness' of an area<sup>5</sup>. This is hugely important principle that is highly relevant to Benedict Wharf. Under the current proposals, the development encourages a density of 265 homes per hectare (not counting the linear park). Although this does not necessarily hinder the possibility of creating a beautiful and humane development, the massing and enclosure ratios within the current designs do.



*The current plan – coarse-grained*

<sup>5</sup> Cited in Boys Smith *et al.* (2019) *Of Streets and Squares*,

*Why is this important?* To appreciate the importance of scale, it is necessary to review what consequences high rise or large blocks have on wellbeing and their correlation with factors such as crime, physical activity and levels of social interconnectivity. Although individual studies show that residents *can* be satisfied in high rise, the majority of research finds that people living in tower blocks are less happy with their homes than people living in low rise. Here are some of the wider consequences:

- *Children in high rise.* There is a strong body of work suggesting the link between high-rise living, childhood behavioural problems and slower development – again even when socio-economic status is comparable. Several studies show that children go outside less when they live in high-rises and that they spend more time playing alone or in restricted play. This is not without consequences. One controlled study, compared mothers of under 5s in the Newcastle estate of Cruddas Park. Sixty-two per cent of mothers living on the sixth floor or above reported difficulties with the ‘play, health [or] personality’ of their children. Fifty-three per cent of mothers in high rise below the sixth floor reported issues. However only 3 per cent of mothers in houses reported issues.<sup>6</sup>
- *Satisfaction and stress.* The link between stress and building height are interlinked. In the UK researchers have found that mothers in flats are more depressed and lonely, that rates of mental illness rose with floor levels, that psychological symptoms increased in high-rise buildings and that those moving out of high-rise became happier and less depressed.<sup>7</sup> A different study in 1978 found similar results. A review of working-class and lower middle class residents of the Bronx in New York found ‘vast differences’ between those living in high-rise and low- rise buildings. Those in high-rise had less social support, a lower sense of control over their lives and felt more crowded than their sociologically identical neighbours in low-rise buildings<sup>8</sup>
- *Human interactions, scale and crime in high rise.* The scale of a building also plays a vital role in our ability to interact with other human beings. Research has shown that large buildings can ‘atomise’ and dehumanise, resulting in withdrawal and anonymity and decrease friendships. At least four separate studies show that high-rise residents have fewer genuine friendships with their neighbours than low-rise residents. With such damaged social bonds, with fewer friendships, it should be no surprise that violent crime can be higher in multi-storey blocks particularly in complex non-conventional estates. Criminals are confident that they are less likely to be identified or challenged. They feel freer to prowl for opportunities to attack or rob.

*Draft recommendation: Be gentle.* The fondest environments are the gentlest, so design for that. Benedict Wharf in its current form risks creating an intense, overwhelming environment, with negative effects on the wellbeing of future residents. Research has shown that, by and large, the best environments are between 50 and 220 homes per hectare (though the higher end of that range requires the amenities of a better connected site).<sup>9</sup> Dense enough to be walkable and provide walkable shops and offices. But not so much as to be overwhelming. We believe the masterplan could become more humane by adopting a

<sup>6</sup> Gittus, E. (1976), *Flats, families and the under-fives*, p. 81

<sup>7</sup> Boys Smith et al. (2016) *Heart in the Right Street* p30

<sup>8</sup> McCarthy, D. & Saegert, S. (1978), ‘Residential density, social overload, and social withdrawal’ in *Human Ecology*, 6. pp. 253-272.

<sup>9</sup> Boys Smith et al. (2019). *Of Streets and Streets* p169

gentle density approach. A density of 150 homes per hectare would help reduce the height of some of the buildings to a maximum of 7 storeys.

*Draft recommendation: Close off the block to create clear public and private spaces.* We believe there is a missed opportunity to improve the efficiency of the current proposal, enabling the highest building heights to be reduced. More homes could be provided by closing off entrance to courtyard gardens and increasing the lowest heights. This would also demark clearly where space is private or public. The light impacts would be less grievous if the highest blocks were reduced.



*Delivering a large number of homes without high-rise*

## *5.2 Quality over quantity. The layout of the development risks creating poor quality public areas.*

**Linear Park.** Creating desirable spaces does not simply depend on the size of that space but the quality of it instead. Under the current proposals, 65 per cent of all of the open space is located within the Linear Park. The role of the park is primarily to connect the site to both London Road playing fields to the south and the Belgrave Walk tram stop to the North West. A variety of factors restrict both the quality and effectiveness of the park in its current form,

- The application fails to make clear the importance of gaining access through the 'Cappagh' site (outside the ownership of the applicant), in order for the park to fulfill this role. Until this is rectified the Linear Park will fail in its role as a connector.
- If the Linear Park's role is to connect people to the tram stop then is it really necessary to create an unnecessarily meandering path? People will want to walk and cycle to the tram as quickly as possible. The design should follow those desire lines.

**Wider open space strategy.** Public spaces have the most impact on our wellbeing when deployed little and often. The proposal has recognised this however it has shortcomings on exposure to sunlight. According to the Daylight, Sunlight, Overshadowing Impact & Overshadowing Self-test Assessments, a number of key areas fail to meet the BRE guide of having at least 2 hours a day. These included parts of the

Boulevard, a number of communal courtyards and public amenity spaces. Exposure to sunlight helps create beautiful and popular public spaces, affecting people's willingness to walk or cycle or even to use local businesses that occupy pavements or squares.

*Draft recommendation: Focus more on little and often.* The communal courtyards, public amenity spaces and Boulevard will be the places where people congregate and come together, not the Linear Park, so design for that. The proposal should be redesigned to enhance these areas, bringing in light and rediscovering their fundamental roles for enriching communities. This recommendation is the natural partner to the proposals for a less 'lumpy' urban plan as set out above.



*People are drawn to sunlight*

*5.3 Rethink the podium parking.* Although we welcome a strategy that reduces parking, taking into account the proximity of the tramlink and bus service, we feel the podium parking solution is misguided.

Some car parking spaces for drop off, disabled access and deliveries will be necessary. However, podium parking is not the optimal solution to providing this. Podium parking decreases active frontages reducing interest at street level and limiting natural surveillance of streets. The current proposal means car parking areas act as back gardens for ground floor residents. This places constraints on light provision, leads to air quality concerns for ground floor residents and the inefficient space can lead to taller buildings.

The repurposing of podiums in the future, as parking requirements fall, is difficult and costly. We are not convinced that podium parking is a resilient, flexible or sustainable approach. We should consider future generations in today's design. This is particularly true after the publication of the Government's recent and more ambitious *Ten Point Plan for a Green Industrial Revolution*.<sup>10</sup>

<sup>10</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/936567/10\\_POINT\\_PLAN\\_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)



*Draft recommendation: choose flexible use and subtle on-street parking.* Where you do need disabled parking, car sharing spaces or loading opt for on-street parking which can be flexibly integrated within shared surfaces and potentially repurposed at a later stage. Only when you must have parking, and expect it to still be needed in 2050, consider underground parking garages.



*Bar-le-Duc, France*

#### *5.4 Get enclosures ratios right if you want streets not canyon.*

Most of us find safely enclosed places quite attractive and reassuring. A good, well proportion street or square achieves this and the wider evidence suggests these are typically more popular. .

*The wind canyon effect.* The inability to view the sky above is not the only consequence. Tightly enclosed streets surrounded by large building, such as the ones proposed at Benedict Wharf can create a dangerous and unpleasant phenomenon called the 'channel effect'. This is a type of micro climatic wind which occurs most frequently when towers are positioned in streets. Long narrow spaces tightly set with buildings are more likely to channel fast downdraught into neighbouring streets.

*Draft recommendation: do not create a wind tunnel.* Most evidence, including our polling, finds that the optimum enclosure ratio is between 1:0.8 – 1:1. Some streets within the proposal fail to meet these recommendations. Our wider research has highlighted that when enclosure ratios rise to more than around 1:0.85, then spaces become less popular (and darker and more windy)<sup>11</sup>. The proportion of 10 storey buildings within the Garden Quarter character means the standard streets will be at least 1:0.7. We suspect they may end up tighter than this. We recommend a maximum height to width ratio of 1:0.85, otherwise spaces and streets tend to be darker, more windy, colder less used and less popular.

## **6. Child's eye view**

### 6.1 *Humanise the streets even more.*

There are many good aspects about the street design. That being said, we believe the design could still go further. Healthy streets are those that put the pedestrian and cyclist first, creating an environment where users of all age can enjoy the space without continually looking over their shoulders to check for traffic. This brings many proven benefits:

- *Pedestrian orientated retail areas are normally associated with increased sales in local shops.* Making places better for walking can boost footfall and trading by up to 40 per cent.
- *Better pedestrian conditions are normally associated with more activity.* For example, a review by Jan Gehl of the effects of widespread pedestrianisation in Melbourne, Australia concluded that:
  - There had been a 39 per cent increase in the number of pedestrians from 1993 and people spent three times more in the city;
  - Pedestrians' use of the city at night has doubled; and
  - Activity in the city during the week has tripled.<sup>12</sup>
- *Car dominated streets even impact on social connectivity and neighbourliness.* Studies have shown that people living on streets with heavy vehicular traffic tend have fewer friends on their street and not many acquaintances. Those living on lightly trafficked streets appear to have three or four times as many friends and twice as many acquaintances. Lots of cars make for bad neighbours.<sup>13</sup>

There is evidence that the applicant has recognised this and taken the first step to creating more healthy streets by reducing the number of cars on site (255). But this is not the only factor. The design of a street also plays vital role too. Under the current proposals only one street on the development (not including Baron Walk) is a shared surface. It is therefore hard to see how the development will succeed in creating a 'less vehicle-dominated street hierarchy'.

*Recommendation. Humanise the streets.* The development will act as a connector for pedestrians and cyclist not cars, therefore the environment should be designing for these users. All streets within the development should be shared surfaces, particularly the Boulevard, using design features that make cars the 'guest'. Even more use should and could be made of features such as attractive paving, extended pavements and Copenhagen crossings.

*Recommendation. The path and cycleway in the linear park is anything but linear.* To encourage pedestrian and cycle use, the applicant must design high quality features that contribute to this cause. The Linear Park is anything but that. Rather than a nauseating meandering path, it should be straight, providing the quickest and most direct route to the tram stop.

<sup>12</sup> City of Melbourne & Gehl Architects, (2004), *Places for People*.

<sup>13</sup> Hart, J., Parkhurst, G. (2011) *Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol*.



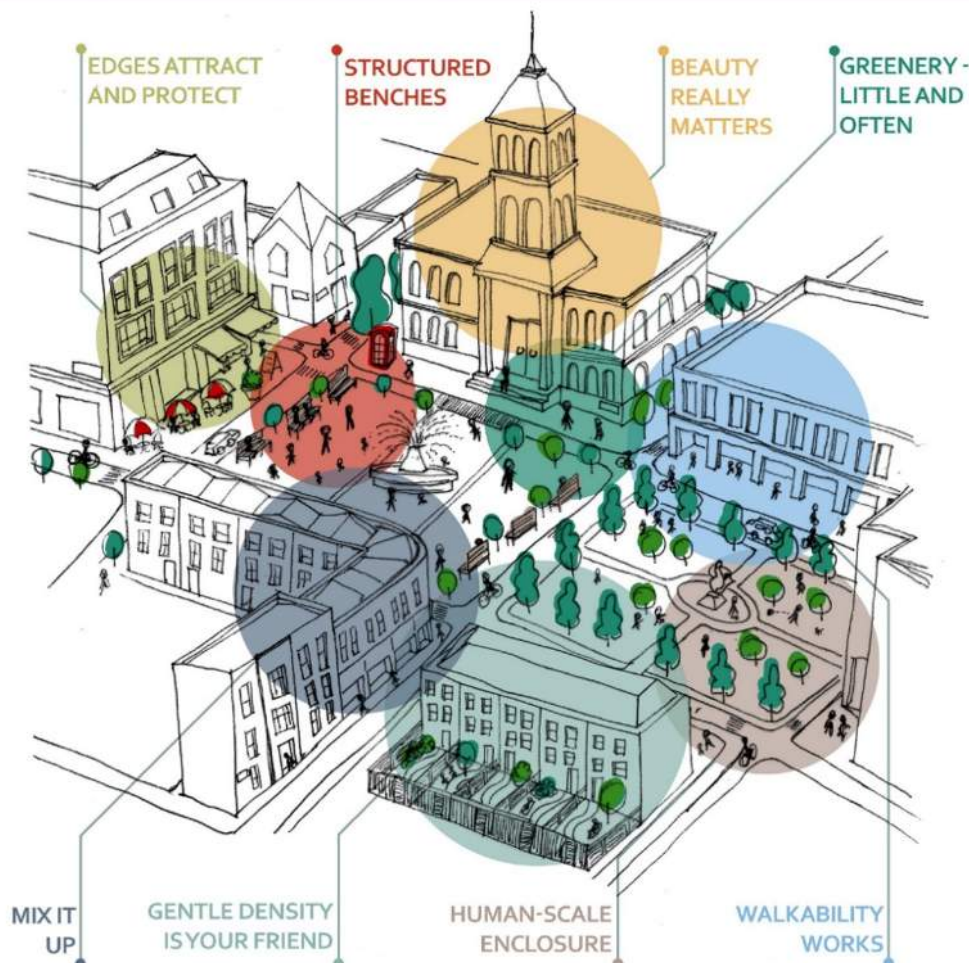
*A simple but pedestrian friendly street*



## Appendix: summary of research into popular, healthy and sustainable places



### HOW TO DESIGN POPULAR PLACES





## Gentle density is your friend



Open spaces should be 50-100 metres wide

The best and most beautiful streets and squares are typically in areas of 'gentle density', half way between the extremes of tower blocks and extended suburbia. Buildings that are 3-7 storeys high, built up space that is 45-65% of the total area, and blocks between 50-150 metres long are normally best.



## Greenery - little and often



- Plant trees 8-15m apart
- 5-15% of land should be public gardens

People like being in green places. Urban greenery is associated with higher physical & mental wellbeing, as long as it is used. You can maximise this by planting street trees, interweaving green spaces into streets and squares. However, greenery on its own is not enough. Squares can be popular places without a blade of grass in sight.



## Structured benches and statues



6-10% of squares should be seating

Where seating is matters. Siting your benches in a 'structured' way helps humans play the right roles: benches that face a fountain, an arcade that lines a square, with a statue or podium in it. But beware of 'bench wash', using seating to try to fix an ugly or windy chasm. Most people will avoid them.



## Beauty really matters



Protected buildings improve perception of place by 19%

The most popular places with 70-90% of people have a strong sense of place, buildings worth protecting and 'could not be anywhere'. They have 'active facades' that 'live' and have variety in pattern. These developments also tend to be more long-lasting and resilient. Their organised complexity attracts, interests and reassures.



## Mix it up!



60% of people prefer to live in a mixed use neighbourhood

Places with a textured mix of different land uses, and active facades, are nearly always more successful. They attract more people and generate more diverse and engaging environments. They can work for longer portions of the day by mixing people at work, lunch, home and play.



## Edges attract and protect



80% of people prefer to sit facing a court

The edges of streets and squares attract us. This is partly because we are used to pavements going there, even when a street is pedestrianised. But it also because there is more to look at (shop fronts, cafes) and (in a square) edges allow us to step back and either watch the world go past, or sample the space.



## Human scale enclosure



Height to width ratio from 1:0.85 to 1:1.5

Most people like to spend time in places that are enclosed and human scale, without feeling too shut in. There is a necessary moment for views that open up as you round a corner, for grand vistas, for open parks, but many of the most popular streets surrounding and linking such views are surprisingly human-scale.



## Walkability works



Residential roads should be 20mph

...but does not quite mean maximising space to walk. Compact, walkable & 'bikeable' environments are good for you. People walk in them more and are healthier and happier. This in turn drives higher values. More walking is encouraged by engaging facades, regularly spaced trees, presence of resting places, and wide pavements.



**BENEDICT WHARF, MITCHAM**  
**ADDITIONAL REPRESENTATIONS FOR MAYOR OF LONDON'S**  
**REPRESENTATION HEARING ON 8 DECEMBER 2020**  
**Outline application for 850 homes – Merton Council reference 19/P2383,**  
**GLA reference GLA/4756**  
**November 2020**

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 worked with the London Borough of Merton and our local councillors to produce the [Cricket Green Charter](#) which establishes our approach to development and change in the area.
2. 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. Its future will also fundamentally change the relationship between Mitcham and Morden as new access is opened up across the site. We are members of the Community Liaison Group for Suez's operations and our input has helped to secure many of the public consultation exercises undertaken for the application. We have publicised and supported these exercises as part of our civic role.
3. These representations summarise the key issues raised by the proposals which cause us to recommend **refusal** of the application. They include an independent critique of the proposals commissioned from Create Streets that confirms numerous shortcomings, including the failure to meet the London Plan's requirements for "*gentle densification*" in low- and mid-density locations such as this. Create Streets finds that "*A more finely-grained approach, more sensitively attuned to London's historic pattern of 'gentle density' would create very nearly as many homes without being so discordant with the surrounding suburbs. This approach would be more popular, better-attuned to post COVID market-demand, more in keeping with Mitcham's history, better aligned with future resident well-being and less likely to create a physical and social divide between new residents and old. Appropriate 'gentle density' this is not, particularly in the post-COVID context.*" The National Planning Policy Framework is clear – "*Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*" (paragraph 130). Our representations and the independent report from Create Streets clearly show that this application is of poor design and that it fails to take the opportunities available for ensuring that Benedict Wharf is developed as a natural extension of Mitcham.

General enquiries: [REDACTED]  
Web site: [www.mitchamcricketgreen.org.uk](http://www.mitchamcricketgreen.org.uk)  
Twitter: @MitchamCrktGrn

Registered Office c/o MVSC, Vestry Hall, 336/338 London Road, Mitcham, Surrey, CR4 3UD  
Company registration no. 04659164 Charity registration no. 1106859



4. These representations supplement those we made in March 2020 on the outline planning application from Suez to Merton Council for development of the Benedict Wharf site for 600 homes, amended to 850 homes, and we ask that these continue to be taken into account. They are available [here](#). These representations informed Merton Council's Planning Applications Committee decision to refuse planning permission subject to this referral to the Mayor of London. This decision was supported by all three ward councillors and our MP. We ask that the Mayor gives particular attention to the following issues in making his decision and **refuses** the application in line with Merton Council's previous refusal.

#### Principle of residential development

5. We welcome Suez's plans to relocate to a more suitable location on Beddington Lane. We believe the need for a waste management site in the South London Waste Plan area is met through the now consented Beddington Lane development and that the need for Strategic Industrial Land more generally is met through the emerging Local Plan, which includes measures both to allocate new sites and intensify the use of existing ones. Merton has a significant area of industrial land and much of it is not intensively used.

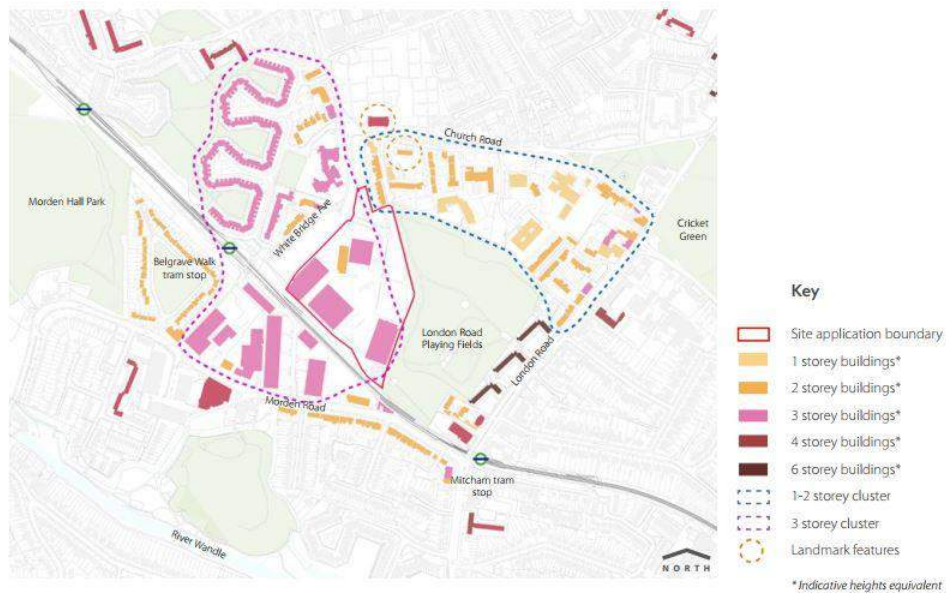
6. We appreciated working closely with Suez in responding to Merton Council's call for sites as part of its Local Plan review and there was considerable alignment in our submissions. We are pleased that Merton Council's draft Local Plan agrees with our approach to a broad definition of the site allocation to include the Cappagh site and land owned by Merton Council along Hallowfield Way. We support the allocation in the draft Local Plan published in November 2020 for further public consultation.

7. Our support for residential use of the site is not unconditional. It extends to development in line with the site allocation in Merton's draft Local Plan. Given their overdevelopment of the site we do not consider the current proposals are consistent with the site allocation. We are dismayed to have reached the position of having to question use of the site for residential development, having done everything we can to work in collaboration with the landowner, Suez, and Merton Council. It may be that with appropriate controls over hours of operation and lorry routes, such that they avoid Church Road through Mitcham Cricket Green Conservation Area, a strategic industrial use will be more appropriate than a massive overdevelopment of the site for housing. Suez has informed us this option would deliver a more profitable use and they have had interest in this type of use. It is an option that now requires thorough consideration as part of the Local Plan review.

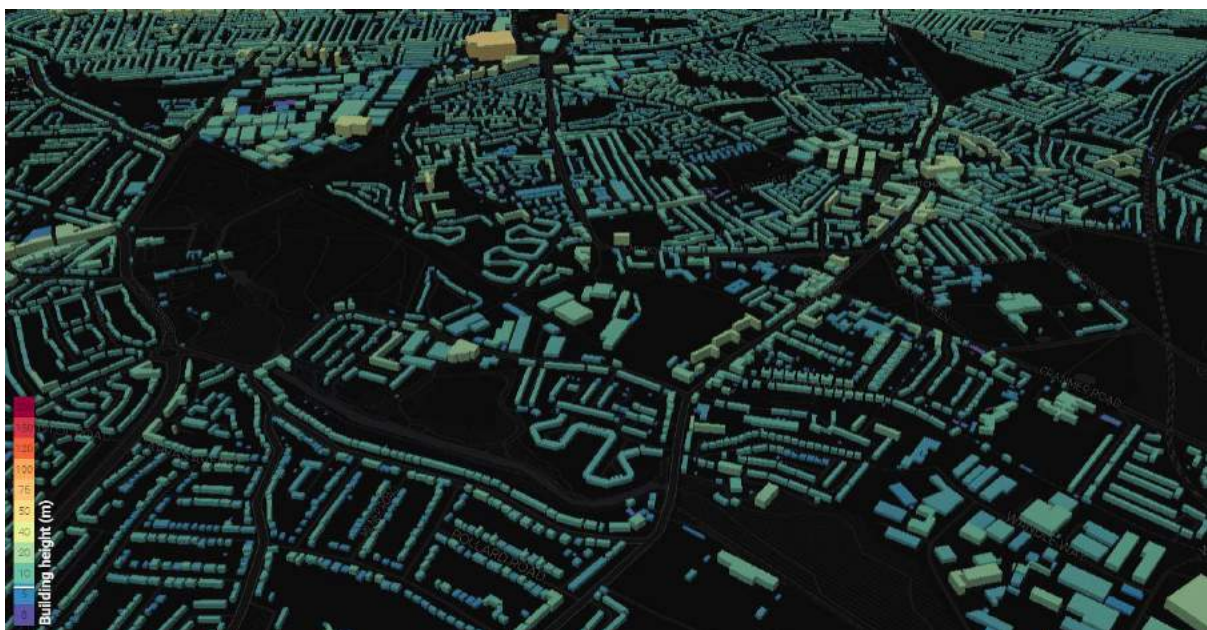
#### Design-led approach

8. London Plan (intend to publish version) Policy D3 seeks to make best use of land through a design-led approach – *"All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity...."* Insofar as a full range of design options has been considered, the scope for accommodating more homes in higher blocks (10 storeys) than those put forward in the original outline application (8 storeys) was rejected as an option in Suez's own Community Design Workshops (held in preparation for submission of the original 600 dwellings proposal). We emphatically dispute the suggestion that the revised plans reflect a design-led approach to the development of Benedict Wharf. We believe the evidence presented has shown that the scale of development proposed cannot be appropriately accommodated on the site without causing significant harm. This is a fundamental conflict with Policy D3.

9. The future of Benedict Wharf is also informed by the Secretary of State's Direction on the London Plan that amends Policy D3 to state that "*Gentle densification should be actively encouraged by Boroughs in low- and mid- density locations to achieve a change in densities in the most appropriate way.*" As we have shown (see below) the site is indisputably located in an area of low- and mid- density development and there is no precedent in the area for buildings of the height proposed. The change in density envisaged is anything but gentle in the context of Mitcham's prevailing development morphology.



Design & Access Statement (2020)



Building Heights in England, EMU Analytics (<https://buildingheights.emu-analytics.net>)

10. The Heritage, Townscape and Visual Impact Assessment supporting the revised application to increase building heights to 10 storeys is irrefutably flawed. It states that the "*the Amended Proposed Development will not result in any change in the effects on*



*the visual receptors or representative views as assessed in the original HTVIA". This is despite a 25% increase in height. The original assessment concluded that the development has a "beneficial impact" on the townscape and that the buildings do "not appear overly dominant". These conclusions lack any credibility and should not be used to inform a decision on the plans.*

11. One example is the assessment of the impact on Church Path. This is described as being of *"moderate and neutral effect"*. The reality based on the applicant's own assessment is starkly different as can be seen below:



12. The draft Local Plan's site allocation states that *"Development proposals must be sensitive to the following.....Residential streets within 100m of the site include Church Path."* A more insensitive approach is hard to imagine.

13. Our analysis is confirmed by the independent report from Create Streets. This shows that:

- Community preferences have been ignored
- The 'industrial character', the proposed scale, height and enclosure ratios, the 'landmark' buildings, and the 'gateways' of the proposed streets do not fit in with the character of the surrounding area and the studies on local detail are utterly ignored
- The quantum of housing proposed fails to create gentle density
- The lack of other uses risks creating a housing dormitory
- The scheme has significant design flaws in the poor quality use of open space, meandering paths, podium parking, missed opportunities for shared surfaces, courtyards and public spaces which fail to meet BRE's minimum guidelines on sunlight, and height to width ratios that will result in darker, more windy and colder streets than can otherwise be achieved

14. Weaknesses in the design approach have also been identified by Merton's Design Review Panel. This gave the final proposals an AMBER rating in January 2020 with some members calling for a RED. In particular it noted that *"It must be able to be clearly demonstrated in the design code that the amount of units proposed can be achieved according to policies on high quality design"*. This has not been achieved. The continuing existence of single aspect dwellings in the scheme is just one example of other design conflicts with the London Plan (Policy D6). Our representations have also demonstrated the significant visual intrusion which will result from development of this scale on the site, including negative impacts on designated heritage assets.

15. The Mayor should also be aware that Merton Council has not signed up to the London Quality Review Charter and so the application has not benefitted from an appropriate quality of independent design scrutiny. No development of this scale and magnitude should proceed without this level of scrutiny.

## Estate renewal

16. We ask the Mayor to address the relationship between Benedict Wharf and the adjacent Phipps Bridge estate, parts of which were also built on a former refuse depot. A strategic approach led by the Local Plan can result in a more significant development that provides more affordable homes and better meets the aims of the London Plan than the outline application. The decision by Transport for London to route a new tram line running between the sites is a further stimulus for a re-think which takes advantage of this strategic opportunity.

17. Many parts of Phipps Bridge are in urgent need of renewal and when combined with the opportunity at Benedict Wharf there is potential for the creation of a significant new Mitcham neighbourhood. Through the renewal of Phipps Bridge this would result in a more diverse range of housing that better meets housing need. It would also reduce the likelihood of Benedict Wharf becoming a dormitory neighbourhood. This opportunity could deliver a major increase in the number of homes overall through making better use of under-used open land on Phipps Bridge and by taking a design-led approach. This would incorporate the concept of gentle density, integrate significant existing open spaces, and provide a streets based neighbourhood. The resulting development would resonate with the character of the local area as well as providing more high quality and much needed affordable homes than can be achieved on Benedict Wharf. This approach will also meet the aims of the London Plan better than imposing an unsuitably dense and tall development on Benedict Wharf.

18. Benedict Wharf is also key to unlocking a much more significant development opportunity that embraces the Cappagh Site, Merton Council's land along Hallowfield Way, Worsfold House and La Sporta. An integrated approach incorporating all of these sites would be a far more joined up approach, better for Mitcham and better for the London Plan.

## Other considerations

19. Our March 2020 representations identify a series of further considerations which need to be addressed by any development of the site and secured by planning condition, including:

- A management plan for London Road Playing Fields supported by an endowment and informed by a character and ecological assessment which secures its open and tranquil character, enhances its wildlife value, provides improved and less intrusive play facilities, removes boundary fencing, opens up more access points, avoids additional lighting, provides more appropriate footpath surfaces and results in no net increase in the area covered by footpaths and other hard landscape - at a previous Representation Hearing for the site an endowment was required by the Mayor of London from SITA (as Suez was previously known) upon completion of the unimplemented plans for more intensive waste management, so a precedent has been set
- New and enhanced pedestrian routes:
  - through Phipps Bridge to Morden Hall Park (National Trust)
  - from London Road between Baron and Fenning Courts (Clarion Housing)
- Major improvements to Mitcham Parish Centre and Mitcham Parish Church as community facilities supported by a community endowment
- Changes to Ravensbury Path and Church Path which respect their character as historic pedestrian routes
- Redesigning plans for Baron Walk to reduce it from an extraordinary 9m to around 3m to respect its sense of place and avoid abuse by cars, motorbikes, scooters and other users – this should be informed by a proper assessment of the existing character and historic significance of the route and ensure Baron Walk is not designed as the major through route for cyclists and pedestrians which should be provided within and through the new development

- Protection of the residential section of Church Path from being a desire line for cyclists and scooters using Baron Walk
- A long term solution to the future of the La Sporta building which brings it into positive community use
- Enhancements to the tram and 200 bus which are already beyond capacity at peak times
- Public realm improvements to Hollowfield Way and the roundabout and junction of Hollowfield Way with Church Road, including a significant reduction in road space
- New pedestrian and cycling routes linking Mitcham to Ravensbury Park, the Wandle, Morden Hall Park and Morden (including through the Phipps Bridge green spaces) and provision of direct access to London Road through Clarion Housing land at Baron and Fenning Courts

20. We ask the Mayor of London to **refuse** consent for this outline application. We stand ready to work with the landowners to develop an alternative scheme which contributes to meeting the area's housing needs and creates a natural extension to Mitcham.

[REDACTED]

---

**From:** Mitcham Cricket Green Community & Heritage  
[REDACTED]  
**Sent:** 23 November 2020 14:07  
**To:** Benedict Wharf  
**Cc:** [REDACTED]  
**Subject:** Representation Hearing - speaking  
**Attachments:** Benedict Wharf - Mayoral Representation Hearing - final representations - Nov 20-compressed.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

We are pleased to attach our representations for the Mayor's Representation Hearing on the proposals for Benedict Wharf. This includes an independent critique of the plans commissioned from Create Streets.

Our verbal representations at the Representation Hearing next month will address the content of these written representations.

It would be helpful if you could confirm receipt and the arrangements for the afternoon.

Thanks

[REDACTED]

[REDACTED]



On 18/11/2020 09:09, Mitcham Cricket Green Community & Heritage wrote:

This is to confirm we would like to speak as a main objector to the proposals for Benedict Wharf at the Representation Hearing.

We will be providing further representations shortly.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2020 14:04  
**To:** Benedict Wharf  
**Subject:** GLA/4756 Representation Hearing 8 Dec 2020 - Objector

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

GLA reference: GLA/4756  
Merton Planning Ref 19/P2383  
Planning Application Land at Benedict Wharf, Mitcham

Objector:-

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Written Submission objecting to the application.

Committee Speech for 19/P2383  
GLA reference: GLA/4756

Mr/Madam Chair

My name is [REDACTED].

Thank you for allowing my comments. I wish to oppose the plan in its current form.

With regard to this plan, I raise these issues, as one who has lived in the area for over 30 years, resident, tax-payer and commuter.

1. 850 new homes, with perhaps 2000 residents (and probably many more) will create a huge negative impact on the local area, especially when combined with development in progress on Western Road.

2. Merton council removed some high rise blocks on Phipps Bridge, and replaced with low rise, in order to combat the problems often found in high rise development, not least the impact on mental wellbeing. Why ignore this sensible approach, now? The latest changes to this plan, increasing its size, have made this even worse.

3. Access is only via Church Road, and the "alternative" access is via the same road a few metres away. Church Road is particularly narrow at one end, and the other has traffic calming measures, and is all regularly jammed. The road surface is crumbling in many places. I believe that this is poor access for such large numbers of people, emergency services, construction traffic, school runs, commuters and delivery vehicles.

4. An original plan for Hallowfield Way extended it onto the A239 Morden Road (almost opposite the new fire station), which would make much more sense, especially from a safety perspective.

5. Provision for car parking should be more realistic, than aspirational. It must be self-contained to avoid spreading beyond the plan boundaries. People moving to the site will not dispose of their vehicles, as the developers' public exhibition representatives seem to think. Mobility scooters and other electric vehicles will all require parking spaces with charging points.

6. Infrastructure planning needs more careful consideration. Examples... Downstream drains seem inadequate. The trams are always overflowing at peak times, and a few extra bus services on solid roads are not an answer. There are many more.

7. Local facilities are already poor. This plan would exacerbate that. There should be more facilities (entertainment, services etc) to enhance the area on-site. Medical Facilities are severely strained (from experience) and schools stretched, I understand. Time currently spent in supermarket queues, and so on.

New development should not be allowed to impinge on existing residents; it must instead bring benefits to the whole area's current constituents, which are abundantly clear for all to see. That is not true in this application, in my opinion.

Finally, I would wish to highlight safety points 3 and 4, once again. A site visit during a pandemic would not do justice to the transport issues. Three and a half years on from the Grenfell disaster, are the Mayor, Committee, Planning Officer, and London Fire Brigade fully prepared to accept personal responsibility for the safety of this development? Given that any approval will essentially be subjective, even allowing for experience, that would be assumed.

Improvements by the Mayor (in advance) to local infrastructure, travel, safety, and low-rise accommodation, would be a much more reasonable proposal for this site.

I would welcome e-mailed questions from the GLA.

Thank you for your time.

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**From:** Owen Pritchard <Owen.Pritchard@local.gov.uk>  
**Sent:** 23 November 2020 10:07  
**To:** Benedict Wharf  
**Subject:** Benedict Wharf/Suez site

Good morning,

I am emailing you on the issue of the proposed development of 850 homes on the Benedict Wharf/Suez site in the ward I represent, Cricket Green.

I am a councillor for that ward and would like to submit a letter of comment.

I recognise wholeheartedly the need for those in local and central government to build homes in Merton, in London, and across the UK. I also agree with the repurposing of the site from its current commercial/industrial usage to residential. It would provide many much-needed homes and – if done correctly - enhance Mitcham as a community and a place. In truth, had this proposal remained for a development of 600 homes or even 650, my only concerns would be on issues of aesthetics, design, and layout.

But the situation has changed. The new proposal – for 850 homes and 10 storey buildings – is a mistake. It will alienate the existing community, detract from the sense of place that the Cricket Green conservation area brings, create further congestion and air quality problems, and would not provide top quality homes.

600 homes were far closer to the optimal development of this site than 850. I say this because optimisation is about more than just density; it's about building homes that you yourself would want to live in; neighbourhoods that are places and not just houses. Our aspirations – like those of our residents – should be about more than high rises, cramped living, and the creation of estate dormitories. We must create a civic and community legacy that, in a quarter of a century, everyone involved will be happy to point to as something they contributed to, and the residents will still be happy to live in.

Thank you and best wishes,

Councillor Owen Pritchard  
Cricket Green Ward

[REDACTED]

---

**From:** Mitcham Cricket Green Community & Heritage  
**Sent:** 18 November 2020 09:09  
**To:** Benedict Wharf  
**Subject:** Representation Hearing - speaking

This is to confirm we would like to speak as a main objector to the proposals for Benedict Wharf at the Representation Hearing.

We will be providing further representations shortly.

Thanks

[REDACTED]  
[REDACTED]



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 November 2020 14:45  
**To:** Benedict Wharf; Benedict Wharf  
**Subject:** Re: Notice of Representation Hearing – 8 December 2020

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam,

Thank you for the information below. I would like to speak at the meeting on the 8th December but I have not yet prepared my detailed statement. I am an objector and do not represent any organisation.

Kind regards,

[REDACTED]

----- Original Message -----

From: "Greater London Authority" <greater.london.authority@notifications.service.gov.uk>

To: [REDACTED]

Sent: Tuesday, 17 Nov, 2020 At 18:19

Subject: Notice of Representation Hearing – 8 December 2020



Dear Sir/Madam,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.**

**Land at Benedict Wharf, Hallowfield Way, Mitcham**

GLA reference: GLA/4756

Hillingdon Council reference: 19/P2383

Notice of Representation Hearing: 8 December 2020

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

23/11/20

Dear Mayor of London,

**Benedict Wharf Mitcham - Outline application for 850 homes**  
**Detailed Statement for Mayor of London's Representation Hearing on 8<sup>th</sup> December 2020**  
**GLA reference GLA/4756**  
**Merton Council reference 19/P2383**

I am writing to you about the above application and I am asking you to **allow the London Borough of Merton's (LBM) decision to proceed unchanged**, i.e. **reject this application**. This decision was overwhelmingly agreed in a cross-party vote by the LBM Planning Application Committee – these are people who know the area and, in fact, it included two ward councillors. Our MP Siobhain McDonagh and another ward councillor also wrote or spoke against this development at the Planning Application Committee.

I am a resident of Church Path Mitcham, a little cul-de-sac of low two-storey cottages that abuts the Benedict Wharf site and is within the Cricket Green Conservation Area.

I have been attending the Suez Community Liaison Group (CLG) for about six years and I have also attended the local workshops and meetings pertaining to this application. The applicant's planned relocation to a site in Beddington Lane is a positive step for them as it will enable them to operate more efficiently. Whilst I am supportive of this site being reallocated for residential use, and I really understand that housing is a critical issue across London, Mitcham needs the right housing; housing that enhances it, not a housing estate that creates problems due to its over-development, over-density and lack of proper care for Mitcham.

My key concerns are detailed below - all of them have been raised at the workshops, meetings and CLG:

- **Height Issues**

Excerpts of the London Plan and LBM's Tall Buildings paper include the following:

- *"The London Plan defines tall and large buildings as those buildings that are 'substantially taller than their surroundings, cause a significant change on the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor'."*
- *"Considering the London Plan definition, any building that has a significant impact on the existing scale and character of an area through height can be considered a tall building. In the context of Merton, where **most of the borough is characterised by 2 storey suburban houses, any building of 4 storeys or higher could be considered a tall building in these locations.**"*
- *"In policy terms, higher density development is directed towards centres and those areas that are well serviced in terms of public transport and infrastructure, and those areas that can accommodate the increase in density without having a detrimental impact on the character of the locality, including the historic environment"*
- *"The LBM Tall Buildings paper indicates that "overall it is considered that suburban neighbourhoods in the borough are unsuitable locations for tall buildings, based on the*

*distinct low scale and cohesive character of these areas, and their locations which are generally outside of centres in areas with low accessibility”.*

This proposed development at Benedict Wharf:

- Is substantially taller than its surroundings - its immediate surroundings are two and three storeys;
- Will have a significant impact on the existing scale and character of the area; an area that includes large numbers of locally listed buildings, many of which are within the Mitcham Cricket Green Conservation Area and contribute collectively to its special interest;
- Is not in a town centre and, with a PTAL rating of 2/3, it cannot be classed as well-serviced in public transport;
- Contravenes all of the above statements from the London Plan and LBM's Tall Buildings paper.

Furthermore, the revised London Plan Policy D3 states that *“Gentle densification should be actively encouraged by Boroughs in low- and mid- density locations to achieve a change in densities in the most appropriate way.”* - how can 10-storey blocks ever be considered “gentle densification” in this area?

Apart from a block of flats way over on the opposite side of London Road Playing fields, all buildings – residential and commercial – in the surrounding area are three storeys or less. Suez’s Heritage, Townscape and Visual Impact Assessment documents do not show any building in the vicinity that is over three storeys. And, the aforementioned block is not a benchmark that any decent architect/developer would aspire to today.

Suez claims that the impact on Church Path is a “moderate and neutral effect” so why do I feel horrified when I see this photo below? Lovely homes dwarfed by a “moderate” effect.



Not only is it overly dominant, towering over the low two-storey homes on Church Path, it also dominates the striking Grade II\* listed Mitcham Parish Church at the other end of this road which stands at the gateway to the Cricket Green Conservation Area.

It is not just the Parish Church that will be overshadowed. The Heritage document states, *“The study area includes large numbers of locally listed buildings, many of which are within the Mitcham Cricket Green Conservation Area and contribute collectively to its special interest”*. Some of these special interest sites will be overshadowed too. The development is now even visible from Morden Hall Park (National Trust, Grade II registered park and garden).

I also believe these heights will create privacy issues for some local residents as they will be overlooked by the new blocks.

The proposed development is too high, out of scale, and towers over the neighbourhood and two conservation areas. And most, if not all, attendees at the workshops and other meetings have repeatedly stated this. We have asked for designs based on streets and houses, not blocks and more blocks, but to no avail.

- **Density Impact**

Based on Suez's Type of Home breakdown, there could be 2,801 people living on the site which is a significant increase on a population of approximately 12,000 (Cricket Green ward). This is in addition to the many other proposed planning applications for various sites in the area.

| Type of Home          | No. of Homes | No. of People Per Home Type |
|-----------------------|--------------|-----------------------------|
| 1B 2P Flat            | 263          | 526                         |
| 1B 2P Flat Wheelchair | 55           | 110                         |
| 2B 3P Flat            | 38           | 114                         |
| 2B 3P Flat Wheelchair | 36           | 108                         |
| 2B 4P Flat            | 342          | 1368                        |
| 3B 5P Flat            | 101          | 505                         |
| 3B 5P House           | 14           | 70                          |
| <b>Total</b>          | <b>849</b>   | <b>2801</b>                 |

The Suez Transport Assessment states "*It has been calculated that the proposal site predominately spans areas with PTAL ratings of 2-3 which suggests that the site has a level of public transport accessibility ranging from 'Poor' to 'Moderate'.*" My understanding is that developments of such high density should be close to areas with a PTAL rating of 5 or 6 therefore Benedict Wharf site, with a poor to moderate PTAL of 2 or 3, is clearly inappropriate for this density.

The previous version of the Benedict Wharf Transport Assessment for 600 units predicted 3,465 Daily Person Trips. I cannot find the equivalent figure in the revised document so, using the same multiplier applied on the original version that would now be 4,762 Daily Person Trips. That figure is based on the number of residents and excludes trips for access to businesses/shops, deliveries and visitors. It is potentially a huge increase in footfall on Church Path which will have a negative impact on the residents mainly due to noise and privacy as the houses have little or no front gardens and the street has very narrow pavements. It will also undoubtedly lead to an increase in litter: the area is already blighted by litter.

Furthermore, can the local infrastructure of medical practices, dentists, hospitals, pharmacies, etc handle this significant increase in residents? This is particularly significant given the higher levels of health/social problems in the east of the borough with residents on average living nine fewer healthy years.

This level of density will have a significant impact on the already-stretched local public transport particularly the tram and 200 bus route. There are no guarantees that additional services will be, or can be, laid on to handle the increase of approximately 2,800 people in the local population.

Access to the site for residents, businesses, deliveries and visitors will be mainly via Hallowfield Way (the only vehicle access option) and Church Path and it will be 24 hours a day, 365 days per year. Church Path residents are sandwiched between these two access routes. As you can see from the photo above, Church Path is a narrow street with very narrow pavements and 50% of its houses do not have front gardens so have no barrier against noise (nobody walking past talks quietly on their phone or to their friends these days).

The Benedict Wharf Transport Assessment predicts a fairly small reduction in vehicular traffic. Maybe. It is certainly not '*considerably reduced*' as claimed in the Heritage Assessment 01 document. Suez was restricted to certain days/times; there will be no such restrictions for the new development so there will be traffic 24/7, the noise of which will impact on local residents.

- **Beauty and Wellbeing**

The recent report from the Government's Building Better, Building Beautiful Commission states:

***Ask for Beauty.***

*We do not see beauty as a cost, to be negotiated away once planning permission has been obtained. It is the benchmark that all new developments should meet. It includes everything that promotes a healthy and happy life, everything that makes a collection of buildings into a place, everything that turns anywhere into somewhere, and nowhere into home. So understood beauty should be an essential condition for the grant of planning permission.*

***Refuse Ugliness.***

*People do not only want beauty in their surroundings. They are repelled by ugliness, which is a social cost that everyone is forced to bear. **Ugliness means buildings that are unadaptable, unhealthy and unsightly, and which violate the context in which they are placed.** Such buildings destroy the sense of place, undermine the spirit of community, and ensure that we are not at home in our world.*

That report also states "*The broad preference is against tower blocks*" and "*Towers always come bottom.*"

As the image further above shows, this development clearly violates its surrounding context, therefore it is ugliness!

There are also studies that show a lower level of happiness and higher rates of mental health issues amongst those living in tall buildings. The recent Coronavirus crisis has highlighted the importance of good mental and physical wellbeing and also the importance of homes with ample space for people to work and live, with private and public outdoor space.

As mentioned earlier, there are higher levels of health/social problems in the east of the borough (this includes Mitcham) with residents on average living nine fewer healthy years and we need to work towards reducing these inequalities and I do not see how that can be achieved by dumping an inappropriate, over-dense, overly-high development of blocks on us just to meet housing targets. We in Mitcham are asking for beauty and quality housing that enhances our overall quality of life.

- **Residential or Strategic Industrial Land (SIL)?**

Previously, I was supportive of this site being reallocated for residential use but sadly, due to the proposed over-development, I am now unsure about that support. Suez says it has a potential buyer who would retain the land as SIL and that might be a better option.

I understand, and agree, that housing is a very important issue but, unfortunately, I do not believe the proposed Benedict Wharf development will help those really struggling with housing – the homeless, those living in converted offices on a local industrial estate, those living in sub-standard rented accommodation, those sofa-surfing, those on the living wage. How many current Mitcham residents will move to this new development? How many of the businesses in Mitcham's town centre will benefit from it? So, a huge impact on Mitcham's local infrastructure (transport, medical, etc) but with very little benefit to Mitcham.

- **Opportunity?**

In March 2020 some of the local residents and Mitcham Cricket Green Community and Heritage had a constructive meeting with Siobhain McDonagh MP and Councillor Owen Pritchard to discuss the Suez application. Part of our discussion covered a bigger picture of the local area encompassing Phipps Bridge and other local sites. We felt that the renewal of the Phipps Bridge area (which is overdue) in conjunction with the redevelopment of the Benedict Wharf site could mean a greater number of homes overall but with a lower density for the Suez site as it could make the most of under-used land in the Phipps Bridge area thereby achieving a revived area and more housing but with gentle densification (as per London Plan Policy D3).

- **Conclusion**

To the best of my knowledge, LBM/Suez did not receive a single letter of support for this application from residents, councillors or local groups. They did however receive objections from our MP, ward councillors and Mitcham Cricket Green Community and Heritage (all of whom represent many local people) as well as residents.

Siobhain McDonagh MP said:

*... My concern is that at 850 dwellings and requiring 10 towers this application represents an **extraordinary overdevelopment** of the site which could see us replicate the tower blocks on the original Phipps Bridge Estate as housing for low income families. These blocks failed those families in the 70s and 80s and were eventually demolished by Merton Council in the early 1990s. It is important that we learn from our mistakes rather than repeat them.*

Ward Councillor Owen Pritchard stated:

*... The new proposal – for 850 homes and 10 storey buildings – is a mistake. It will alienate the existing community, detract from the sense of place that the Cricket Green conservation area brings, create further congestion and air quality problems, and – most importantly – would not provide quality homes.*

*... optimisation is about more than just density; it's about building homes that you yourself would want to live in; and neighbourhoods that are places and not just houses. Our aspirations – like those of our residents – should be about more than high rises, cramped living, and the creation of estate sized dormitories. We must create a civic and community legacy that, in a quarter of a century, we will happily point to as something we contributed to, and the residents will still be happy to call home.*

The Mayor's Stage 2 review additionally received an objection from Mitcham Society – another local organisation representing many people. Note that the Mayor's Stage 2 Report bullet 88 states "A member of the public" responded whereas in fact there were at least three of us – myself, Julia McDonnell and Frances Healy.

The Mayor's Stage 2 review did not receive a single letter of support for this development.

Given all of the above, I am asking the Mayor of London to **allow Merton Council to proceed with its decision to refuse consent** for this outline application. Merton council, our MP and ward councillors know this area and they know that this application is out of context. Please ask the applicant to engage properly with the community to produce a design-led solution based on gentle densification that considers people - individuals and families - before targets and profit, and that will have a positive impact on the wellbeing of future, and existing, residents here. Mitcham needs good quality homes rather than mass density, houses and streets not overwhelming towers, and good growth, not growth at any cost. It can be done.

Yours sincerely,

██████████

[REDACTED]

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**From:** [REDACTED]@merton.gov.uk>  
**Sent:** 17 November 2020 13:28  
**To:** [REDACTED]  
**Cc:** Jules Pipe; Tom Copley; John Finlayson; Benedict Wharf; Councillor Stephen Alambritis; Councillor Mark Allison; Councillor Martin Whelton  
**Subject:** Benedict Wharf, Mitcham GLA Case Number 4756 Letter  
**Attachments:** Benedict Wharf, Mitcham GLA Case Number 4756 Letter.doc  
**Importance:** High

Dear Sadiq

Please find the attached letter for your attention from the Leader of Merton Council, Stephen Alambritis MBE, regarding Benedict Wharf in Mitcham, GLA Case Number 4756.

Best wishes,

[REDACTED]

[REDACTED]  
Policy and Research Officer (Labour Group)  
Merton Council  
[REDACTED]

**COUNCILLOR STEPHEN ALAMBRITIS MBE**  
**LEADER OF THE COUNCIL**  
(Labour, Ravensbury Ward)

Sadiq Khan  
Mayor of London  
The Queen's Walk  
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SE1 2AA

Email: [mayor@london.gov.uk](mailto:mayor@london.gov.uk)

**London Borough of Merton**  
**Merton Civic Centre**  
**London Road**  
**Morden SM4 5DX**

*Tel:* 020 8545 3424 (Civic Centre)  
*Email:* [stephen.alambritis@merton.gov.uk](mailto:stephen.alambritis@merton.gov.uk)

*Date* 17 November 2020

Dear Sadiq

Re: Benedict's Wharf, Mitcham (Merton Ref 19/P2383; GLA ref 4756)

As the outgoing leader and the leader-elect of Merton Council, we are writing to you asking that you grant approval for outline permission at Benedict's Wharf, Mitcham for 850 homes, 35% of which would be affordable.

It was a matter of deep regret that the Merton planning committee did not grant approval for a development that would have provided 297 affordable homes, the majority (178 homes or 60% of the total number of affordable homes) would be for households on the waiting list for council housing in London. As a borough we have very limited number of large sites that come forward for development in Merton due to our fragmented land ownership and high land costs. Over 90% of planning applications for new homes in Merton are for less than 10 homes so 178 genuinely affordable homes would exceed what we have achieved in many recent years in terms of new housing.

This site is ideal for development. The waste management use on the site is moving to a site in Sutton which has planning permission for waste, and there will be no loss of waste capacity or job losses. For many years, local residents have had to endure 40+ lorries each day with Benedict school at the entrance and two special schools located nearby. Moving the waste use will both improve road safety but also the air quality and emissions, and will improve the local environment. For many years local people and groups have sought to get rid of the waste uses from this site given the heavy vehicle traffic it generates and bearing in mind the single access location and close proximity to the schools and homes. Merton's Planning Applications Committee refused Suez's existing scheme earlier this year, but it is important to note that this was on design grounds and the principle of residential on the site was accepted.

As well as providing 850 homes, including affordable homes the current proposals would:

- o Provide up to 750sqm of flexible business space
- o Make the area easier to get around and more open – people will be able to walk from London Road across the London Road playing fields to the tram stop and on to Morden Hall Park
- o Provide landscaping and other improvements to London Road playing fields
- o Open up the (incredibly dark and enclosed) Barons Walk path from Church Road to the tram
  - Provide a path from the site to the tram at Belgrave Walk



- Contributions to local travel including bus capacity and bus stops

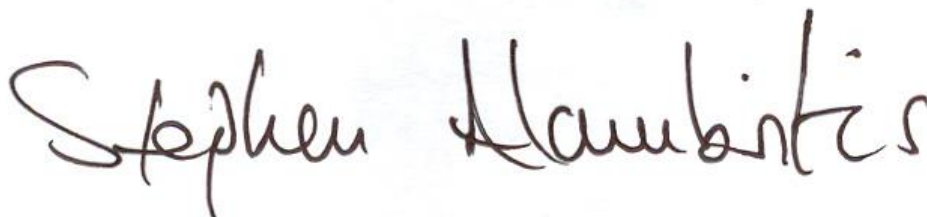
The infrastructure assessment currently shows that there is sufficient local infrastructure (school places, GP and healthcare proposals) locally to accommodate the new residents. As with other sites, the scheme will pay a substantial amount of Community Infrastructure Levy and if there were to be any unexpected shortfalls in infrastructure locally then we would use CIL to address these.

When the planning application was first submitted to the council, the proposal was for around 650 homes. However the GLA Stage 1 response was that they believed that the site was underdeveloped and the number of homes should be increased. The applicants then increased the number of homes to 850 and the council re-consulted on the planning application.

We hope that you will grant permission for these new homes. It was a development that received only 13 objections and we believe that this development would enhance the area and provide much needed new homes which is the top priority in our residents' survey.

This site is an ideal opportunity to provide more homes at one of the largest potential sites for housing in Mitcham. We hope that you will grant approval for this development and enable the development of more homes which will help address the shortage of homes we have here in Merton.

Kind regards

A handwritten signature in dark ink, reading "Stephen Alambritis". The signature is fluid and cursive, with the first name "Stephen" and the surname "Alambritis" clearly legible.

**Councillor Stephen Alambritis MBE**  
**Leader of the Council**

A handwritten signature in dark ink, reading "Mark Allison". The signature is fluid and cursive, with the first name "Mark" and the surname "Allison" clearly legible.

**Councillor Mark Allison**  
**Leader Elect**

CC: Jules Pipe, Tom Copley, John Finlayson