



DEMOLITION OF 22 COMMONSIDE WEST FOR FIVE FLATS

**Application number 16/P2966
September 2016**

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 been closely involved in the development of the Borough Character Studies, the Conservation Area Appraisal and Management Plan and in influencing numerous development proposals in the area. 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 and has been acknowledged in finalising the Conservation Area Appraisal and Management Plan for Cricket Green (<http://mitchamcricketgreen.files.wordpress.com/2013/04/cricket-green-charter.pdf>)
2. The application relates to a site within Three Kings Piece character area identified in the Mitcham Cricket Green Conservation Area Appraisal and Management Plan. The current building is specifically identified as making a "*positive contribution*" and the case for demolishing the existing building has to be made before considering any new development and this in turn needs to preserve or enhance the Conservation Area.
3. The application site is in a prominent location which features in significant views across Three Kings Piece (which is Metropolitan Open Land and part of the proposed Wandle Valley Regional Park) and from Beehive Bridge. The mix of existing housing and other development along Commonside West presents a varied aspect of generally well-spaced and modest developments. The site is within an Archaeological Priority Zone and at an important gateway to Mitcham Town Centre (as recognised in the emerging Borough Character Study for Mitcham). Any new development needs to fit sensitively within this context.
4. We were pleased to welcome the redevelopment of 18 Commonside West nearby and the standards eventually achieved by this development set a helpful precedent for future proposals to demolish and redevelop residential buildings along this important road.
5. We have considered the proposals in the context of the National Planning Policy Framework, development plan, Conservation Area Appraisal and Management Plan and the emerging Borough Character Study. We believe they conflict materially with the policy framework, damage the Conservation Area and represent a poor design response to this prominent location.

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6. We object to the proposed development on the following grounds:

Loss of an important building - no reasons have been advanced for the loss of the existing building which is identified as making a "*positive contribution*" in the Conservation Area Appraisal and Management Plan and is occupied. It is also a 5 bedroom property of which there are few examples in the area and so adds to the desired housing mix. Policy DM D4 c) and d) states that the loss of a building that makes a positive contribution to the Conservation Area should be treated as *substantial harm to a heritage asset*. It also states that proposals that will lead to substantial harm to the significance of or the total loss of heritage assets will only be granted in *exceptional circumstances where substantial public benefits outweigh the harm or loss* in accordance with the NPPF. This is clearly not the case with the current scheme which is of moderate quality.

Excessive height – the three storey structure conflicts with the predominant two storeys of other dwellings – the three storey flats at 23 Commonsides West do not provide an appropriate comparator given their location with significant open space on two sides. The appropriate comparator is the building line of Commonsides West itself. This is the line that the development at 18 Commonsides West has respected following revisions to a refused planning application.

Overdevelopment - replacement of a single dwelling with a block of flats would significantly overdevelop this site and introduce an incongruous dense urban form into the assemblage of buildings along this stretch of Commonsides West which is recognised in the draft Borough Character Study for Mitcham as providing an "*architecturally eclectic edge to the common unified by their commonside setting.*"

Poor quality design – the design does not relate well to its context and fails to meet the development plan's requirement for it to respond to or reinforce locally distinctive patterns of development or the area's character. We do not share the applicant's view that the proposed scheme secures an effective transition between 18 and 23 Commonsides West – by taking its design cues from 18 and its height and massing cues from 23 it presents an unhappy compromise. We do not object to a contemporary design but this should be distinctive. Instead, the proposal takes too many cues from 18 Commonsides West and presents a lazy, derivative, option that adds nothing to the area.

Impact on Metropolitan Open Land - the new building would be conspicuous from the neighbouring Three Kings Piece and injure its qualities.

Loss of trees – it is proposed that a single tree replaces the loss of seven on the site.

Poor architectural details - the verandas and windows are insensitive and serve only to clutter the appearance of the new housing from across Three Kings Piece. The glass verandas would be particularly incongruous and additionally attract permanent household clutter which would detract considerably from the views across Three Kings Piece and from Beehive Bridge as well as from much closer proximity. The scheme would also be a significant source of light pollution across Three Kings Piece. Any development of this kind would need strong controls over the type of glass and use of verandas, controlled by planning condition. This would require the use of obscured glass to provide at least some visual protection from the clutter.

7. As a result we believe the proposed development is in conflict with NPPF paragraph 48 (refusing poorly designed development) and Policies DM D1, DM D2, DM D4, DM O1, CS8, CS13 and CS14. Given the positive contribution made by the existing building we believe the case needs to be made as to why this cannot be retained. We believe that the lack of an appropriate replacement for the current dwelling warrants refusal of the application for Conservation Area consent for demolition.

8. For the reasons identified above we ask that planning permission and Conservation Area consent for the proposed demolition and redevelopment is refused. There are insufficient material considerations to justify departing from the adopted development plan policies and the development would harm the Conservation Area. We should emphasise a particular conflict with Policy DM D4 c) & d).