



WHITE HART DEVELOPMENT
Planning application 18/P2216
December 2018

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 Merton Local Plan, Borough Character Studies, the Conservation Area Appraisal and Management Plan and 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 the Conservation Area Appraisal and Management Plan for Cricket Green (<http://mitchamcricketgreen.files.wordpress.com/2013/04/cricket-green-charter.pdf>). We have also contributed to production of the Merton Heritage Strategy as a member of the Merton Heritage Forum. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run Mitcham Heritage Day and Community on the Green.

2. The White Hart is one of the most important buildings in Merton and plays a critical role in Mitcham Cricket Green Conservation area by virtue of its historic significance and prominent location. It is not only nationally listed Grade II but also prominent in the historic townscape at the heart of the Conservation Area and adjacent to the world's oldest cricket ground. Together with the Burn Bullock it provides a connection to the area's location on the historic coaching route south and the role of these two former coaching inns. It also provides both a local landmark and a focal point at the Jubilee Corner road junction, as recognised in the Mitcham Cricket Green Conservation Area Appraisal and Management Plan. It is recognised in this Plan as the only focal point for this part of the Conservation Area.

3. We have considered the proposals for restoration of the White Hart to its historic use alongside the proposed alterations and the development of flats to the rear in the context of the Cricket Green Charter and development plan policies for the area.

4. We support the principle of residential development on the site and restoration of the White Hart which closed some years ago. Our approach is set out in our representations on the emerging Local Plan:

White Hart backland



Current uses – Private car park

Preferred future use – Residential (C3), Car park

Existing planning & other issues – Mitcham Cricket Green Conservation Area, setting Grade II* building (White Hart), Archaeological Priority Zone, Wandle Valley buffer

Future opportunities – Making positive use of unkempt and under-used site including:

- Mews style residential development accessed from Broadway Gardens
- Rationalised parking for White Hart and residences
- Investment to improve condition of Grade II* listed White Hart
- Public realm investment

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5. The site allocation in the draft Local Plan is consistent with our representations and links the scope for residential development to that required to restore the White Hart and re-open it as a public house – “*Restaurant (A3 use class) or public house (A4 use class) with associated car park with potential for residential development to enable the restoration and viable function of the White Hart*”.

6. We are disappointed that the applicants have chosen not to engage with us and others in the local community when developing the proposals. As the National Planning Policy Framework states:

"Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

NPPF para 128

This lack of engagement means that the proposals should be looked on less favourably than schemes, such as the redevelopment of the Queen's Head, which have engaged local people.

7. We support those elements of the proposals which restore the White Hart and do not object to the proposed demolition at the rear and conversion of the buildings to the rear. We are content with the application for Listed Building Consent providing it is linked to the re-opening of the White Hart for its historic use. We also support the approach to requiring vehicle access to be to the rear of the site and seek confirmation that the historic entrance facing Cricket Green is for pedestrian use only and will not be used for servicing or any vehicle access.

8. We object to the rest of the plans as they cause needless harm to both the Conservation Area and the setting of the listed White Hart as a result of:

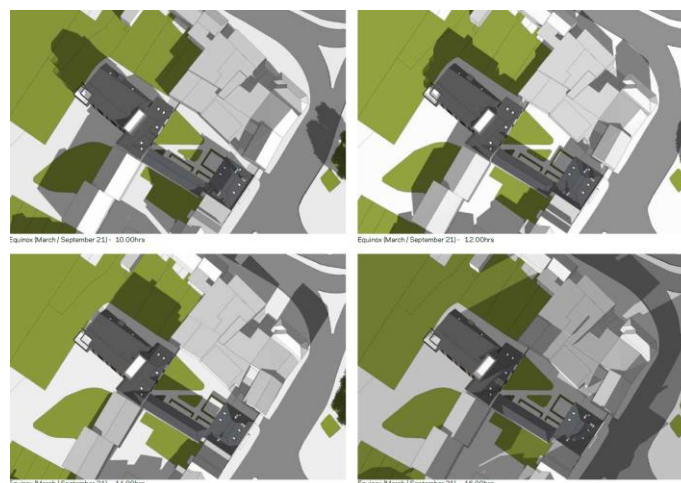
- Substantial harm to the Grade II listed White Hart without a clear and convincing justification which is in conflict with national planning policy (NPPF paragraph 194). The NPPF also states that permitting such harm should be “*exceptional*”. This harm is evidenced by the negative impact on the key view to the White Hart identified in the Conservation Area Appraisal and Management Plan on the approach along Cricket Green road. This shows the backland development will be visible both above the ridge line of the listed building and to its right. This impact is confirmed in Figure 77 of the Built Heritage statement and p39 of the Design and Access Statement (below). We disagree profoundly with the conclusion reached in the note accompanying Figure 77 that “*the impact of the development proposals is considered to be very low and the corresponding harm to the significance of the affected listed buildings would be minor to negligible*”. This is a fundamental issue for the site and any future development should not be visible from Cricket Green.



- Overdevelopment of this constrained site by virtue of the excessive mass and height of the proposed development on the backland site which is also over and above that required to enable the restoration and viable function of the White Hart
- The everyday could-be-anywhere design of the proposed flats which does not take strong design cues from the surrounding Conservation Area and includes intrusive projecting balconies despite the Design and Access Statement acknowledging that *"most of the balconies are inset, which lends depth and richness to the elevation"* with the implication that projecting balconies do not
- The lack of any visual analysis of the impact of the proposals on views west from Lower Green West. Any development should not be visible from Lower Green West and no permission should be granted without suitable supporting information. The only analysis provided is from London Road by the new Cricketers flats (p42, Design and Access statement) and this suggests there may be a significant impact with the new development visible on the skyline above existing heritage assets. Any visual impact on Lower Green West and its listed war memorial would be harmful



- Flawed proposals to divide new open space within the site between serving the White Hart as a beer garden and providing amenity space for new residents – we cannot see how the conflicts between these two uses can be resolved and suggest that the focus of this area is as a beer garden. The shadowing analysis accompanying the application also confirms the beer garden proposed will receive very little sunlight and fall short of BRE guidelines requiring at least two hours at the equinoxes. The extent of shadowing is excessive for a beer garden whose users are expected to dwell and this supports its extension further back into the more sunlit residential amenity space



- Negative impact on the amenity of adjacent properties along Lower Green West and Cricket Green School which will be substantially overlooked
- A failure to take the opportunity to move servicing of the White Hart to the rear of the building and away from London Road at the congested Jubilee Corner in accordance with Policy CS20. This would also avoid the introduction of a new loading bay on the highway in front of 346-348 London Road which will impact negatively on both the setting of this listed building and the amenity of these residential cottages as well as creating traffic congestion

9. We are concerned by the variable quality of the information provided in support of the application. We find the arboricultural report to be sound but there are glaring errors in some of the other documents, including the Design and Access Statement confusing the former Queen's Head public house with Mitcham cricket pavilion and including the now demolished Cricketers pub as part of the local context. There are other errors such as identifying a largely residential and car workshop area as retail in the Construction Management Plan. The Daylight and Sunlight report takes a fluid view as to the applicability of BRE guidelines and the Built Heritage statement is selective in its identification of heritage assets impacted by the proposals, omitting, for example the locally listed gas lamp immediately opposite by the nationally listed horse trough. There is also a lack of information on key issues, such as the visibility of the planned development from Lower Green West and on the approach to the Conservation Area along London Road from the west. No information is provided on the relationship between the quantum of development proposed and that necessary to secure the restoration and future viability of the White Hart in its historic use despite it being a key consideration in the draft Local Plan allocation. The gaps and weaknesses in the supporting information need to be addressed prior to any decision on the proposals.

10. Given the sensitivity and importance of the site and the scale of development proposed we ask that the plans are considered by the Design Review Panel ahead of an officer recommendation.

11. We consider the proposals to be in conflict with development plan policies CS2, CS14, CS20, DM D1, DM D2, & DM D4 and to cause substantial harm to both the Conservation Area and Grade II listed White Hart and other listed buildings and heritage assets. We would welcome the opportunity to work with the applicants to develop revised proposals which are more modest in scale of development and take advantage of the opportunity to provide dwellings of a design and character which enhances the Conservation Area. Any future development should be no more impactful than the former 1930s neo-Georgian building to the rear and we have proposed an alternative news-style development.