



AMENDED PLANS FOR DEVELOPMENT OF LAND BEHIND PRESHAW CRESCENT FOR 9 FLATS

**Application number 17/P1942
November 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 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. We have made earlier representations on the previous applications for 15 and 13 flats on the site and welcomed the opportunity to meet with the architects in the development of these schemes. We are astonished that these plans have come forward as an amendment to the original application. They are significantly different and in our view they require a fresh application with new supporting information addressing, for example, the impact on key views and a fresh daylight and sunlight assessment. We ask Merton Council to reconsider the validity of proceeding with consideration of this application which could be open to challenge.
3. We are also disappointed that the new architects chose not to engage with us and others in the local community when developing the revised 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 the previous schemes.

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4. We are not opposed in principle to some development in this location. Nevertheless, the development site is an important area of green space in Mitcham Cricket Green Conservation Area. The onus is on the applicant to demonstrate that the proposals will preserve or enhance the Conservation Area. The site is also extremely difficult to access and has been subject to the illegal removal of significant trees. This application should be considered as if the trees were still present.

5. The revised plans fail to demonstrate how they will overcome the loss of important open space which makes a positive contribution to the urban scene and to the character of the Conservation Area. The existence of this unusually large garden site is one of the key contributors to local character and the scale of the loss is significant. The scheme also fails to address the pre-emptive and unauthorised clearance of mature trees and other vegetation from the site. This will require replacement by trees of at least equivalent value and maturity and the evidence that this will occur is not provided. To do otherwise would be unacceptable and simply encourage pre-emptive clearance of sites elsewhere. As a minimum we would expect to see a valuation of the trees lost and those which are intended to replace them. We cannot see how this loss can be addressed without a significant redesign to allow for much more open land. The proposals provide very little by way of open space and much of the site is converted to car park. Any new development should provide at least as much tree cover as was protected previously and be supported by planning conditions to secure the long term maintenance of trees and the wider landscape.

6. We also have concerns over the scale, bulk and design of the buildings. These will intensify development in an already congested area and damage the outlook from neighbouring residences at significant loss to local amenity. The revised plans provide no evidence that they will not have an unacceptable impact on local amenity and rely on (inadequate) evidence that relates to a previous scheme. No new information is presented despite the significant new impact of the new entrance on nearby residential properties. The proposals both cram the site and offer a poor access which is much less appropriate than the previous scheme.

7. The design lack distinction and fails to respond to the Conservation Area location. It turns its back on Beadle Court and offers a poor and confused elevation. There is no evidence provided for how the new proposals respond to design cues in the local area.

8. The proposals fail to take up opportunities to integrate with the local area by strengthening the relationship with Beadle Court, securing pedestrian and cycle access from Church Road or increasing local permeability by providing access through the site. This will require a collaborative approach with Wandle Housing. Public access through the site from Church Road through Vine Cottages to Harwood Road should be significantly improved and positively encouraged. The proposals make no provision to provide public access through the site and improve linkages between Harwood Avenue and Russell Road. This could be a much more satisfactory alternative for the site, providing new public open space alongside new access routes and delivered off the back of more modest development proposals. The applicant should be encouraged to rethink the plans so it can be provided. It would also avoid a single access point for residents and services requiring the use of Glebe Path, Russell Road, Love Lane and Harwood Avenue which are all heavily parked and one track. Improved access will also enhance public safety through natural surveillance.

9. As a result we believe the proposals fall foul of national planning policy which states that "*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*" (NPPF, paragraph 130). It is a poor design and it does not respond to the local area or improve it. It is also in conflict with development plan policies CS14, DM D1, DM D2, DM D4, DM O2 and DM T2 and without further modifications will lead to substantial harm to the Conservation Area.

10. There are also practical issues with the site due to severe restrictions on access. These will cause intractable problems during both construction and long term access for residents and servicing. The revised plans provide no new evidence that these issues can be satisfactorily addressed.

- construction access - the Framework Construction Management Plan provided with the earlier application demonstrates the practical difficulties of construction traffic accessing the site via Russell Road without either extensive parking restrictions or the use of small transit vans. It is unable even to recommend a preferred option and the swept path analysis shows construction vehicles mounting pavements. Either option will have a severe and detrimental impact on the amenity of this residential area with multiple construction vehicles arriving (from 7.30am) and leaving causing major disruption to both Russell Road and Glebe Path. There is also only a vague commitment not to work on some Saturday mornings. The information provided also confirms the number of vehicle movements is not yet known. This all points to an unacceptable impact and too high a degree of uncertainty to grant planning consent.
- residential access and servicing - the Transport Statement asserts that the long term access requirements for residents, servicing and emergency vehicles are the same as those for Beadle Court and so "*fit for purpose*" – a view strongly challenged by local residents. The local streets are always one track, as the residents have a need to park cars in the streets. Indeed, it is normal to walk in the street for much of their length as the pavements are blocked by cars.

11. We should repeat earlier comments on the poor quality of some of the information provided with this application. This feedback was provided two years ago and the revised plans fail to address it or provide the information necessary to make a determination of the new plans. It is readily apparent that the supporting information cannot be relied upon to inform any of the key assumptions on which a decision needs to be made. The application:

- includes basic errors – such as conflating the Wandle Valley Regional Park with SSSI designation
- lacks vital details such as the number and frequency of vehicles entering the site during construction
- has failed to provide detail of the financial value of the mature trees which have been removed without authorisation and so lacks any substantive commitment to addressing their removal
- includes much information that relates to the previous planning application, including references to discussions with Mitcham Cricket Green Community & Heritage unrelated to the current development proposals. For the absence of doubt there has been no contact with us during the development of these plans.

12. We object to the plans on grounds they are in conflict with development plan policy, fail to preserve or enhance the Conservation Area and are in conflict with national planning policy for failing to take the opportunities available for improving the character and quality of the area and the way it functions.