



DEVELOPMENT OF 370-374 LONDON ROAD
Planning application 19/P2785
December 2019

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. Our approach to development and change in the area is established in the Cricket Green Charter which was refreshed in 2019 with the support of London Borough of Merton and local councillors (<https://mitchamcricketgreen.org.uk/cricket-green-charter/>). The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. 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. We ask that these representations are made available online through Planning Explorer.

2. We have considered the proposals for 19 flats and 213 sq m of ground floor commercial space in the context of:

- the site's prominent location on the edge of Mitcham Cricket Green Conservation Area for which it acts as a gateway
- the site's proximity to the nationally listed Burn Bullock and its location in its setting
- development proposals for the adjacent former Kwik Fit site
- relevant development plan policies
- the refreshed Cricket Green Charter

3. We support the representations made by the Mitcham Society.

4. The National Planning Policy Framework states that "*applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*" (paragraph 128). The applicant has made no effort to engage with the local community and did not share proposals which went to the Design Review Panel. This is despite the site allocation in the emerging Local Plan being one which we put forward. This application should, therefore, not be looked on favourably.

5. We recognise the potential for development of this site and have proposed it as a site allocation in the new Merton Local Plan. Our representation is below:

General enquiries: info@mitchamcricketgreen.org.uk
Web site: 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

366-374 London Road



Current uses – Outdoor car wash

Preferred future use – Residential (C3) or Office (B1) with ground floor retail (A1/A2 but not hot food takeaway A5)

Existing planning & other issues – Archaeological Priority Zone, Wandle Valley buffer, setting of listed building (Grade II Burn Bullock), adjacent to Mitcham Cricket Green Conservation Area

Future opportunities – Positive use of empty site with active frontage to London Road strengthening and extending local retail parade. Height to be guided by context of buildings over shops running along London Road to south west

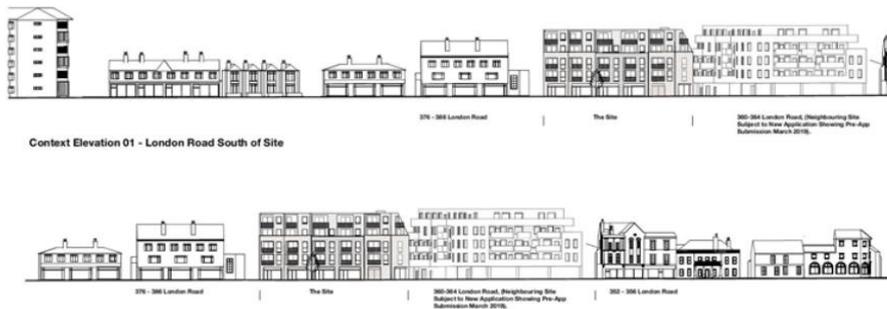
6. We support the proposed residential use of the site. We also support the opportunity for strengthening and extending the local retail parade through A1 and A2 uses. Critically, our representations are clear that the height of any development should be guided by that of existing buildings running along London Road to the south west of the site. Our representations also seek to avoid use of the ground floor for hot food takeaway (A5). We note that Merton Council’s most recent draft site allocation supports “Mixed used non-residential (shops, services, offices, community – use classes A1, A2, B1a, A3, A4, D1) on the ground floor and residential (C3) on upper floors.” We support this mix of uses and welcome the fact it does not include hot food takeaways.

7. We strongly objected to the scheme which has been permitted for the former Kwik Fit site at 360-364 London Road because of its height, bulk, poor quality design which would harm the Conservation Area and because of the precedent it would set. Our concerns have been confirmed with this scheme which uses the height of the as yet unrealised but permitted scheme for 360-364 London Road as its guide.

8. We believe it is inappropriate for the scheme to justify its height and bulk in accompanying drawings by reference to a development proposal for 360-364 London Road which has not yet even been submitted as a planning application. This should be disregarded. The supporting documents also reference a scheme for development behind the White Hart which has been recommended for refusal.

9. We object to the proposals on the following grounds.

10. Excessive height and mass – By taking its lead solely from the permitted development at 360-364 London Road the proposals present an incongruous, bulky elevation facing London Road which also fails to respect the setting of the Conservation Area and views out from the historic cricket ground. This is clearly illustrated in the applicant’s own supporting evidence (below) where the scheme dominates the existing buildings. The height of any development on this site should be guided by the buildings to the south west. We note that the most recent site allocation in the draft Local Plan states that the height should be “guided by context of buildings over shops running along London Road to south west and the proposed development at 360-364 London Road” but the development does not do this. A three or four storey scheme with generous floor heights at the ground level and a roofline consistent with that of buildings to the south west would be appropriate. Broadway Gardens provides the most appropriate location for an increase in height to the permitted scheme on 360-364 London Road. A more modest scheme will also avoid harm to the setting of the Conservation Area.



11. Entrance to Broadway Gardens - the proposals will also have a detrimental impact on the entrance to Broadway Gardens. This will be flanked on both sides by buildings of excessive height in a manner found nowhere else in the local area.
12. Overlooking - the scheme will create significant overlooking for existing residents in Broadway Gardens.
13. Impact on setting of listed building - the site is within the setting of the Grade II listed Burn Bullock. By virtue of its excessive height and mass we believe the proposals will cause harm to this setting.
14. Design quality - the design approach is every day and ubiquitous. It does not respond to the rich character of the surrounding neighbourhood and will not add positively to the area. The ground and first two floors are the most successful and we welcome the use of recessed balconies. The upper two floors are poorly executed, with intrusive balconies, poor use of materials and an incongruous white colour which has no locally relevant design references.
15. Ground floor use - we support a flexible approach to the use of the ground floor. This should ensure active uses and extend and strengthen the existing retail parade whilst recognising the challenging economic situation for nearby retailers. The scheme should be designed such that it will not be suitable for later conversion of the ground floor to residential use. We do not support the proposed option for use of the ground floor for hot food take away(s) (A5). We agree with Merton Council's draft Local Plan site allocation which makes no provision for A5 uses. There is already a concentration of hot food take aways in the immediate area with Super Pizza, Chicken World and Mitcham Kebabs. The site is a 210m walk from SS Peter & Paul Primary School. The London Plan's Policy E9 states that "*Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school*" and recognises that "*a wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools.*"
16. Affordable housing - we believe the viability study provided should be subject to independent scrutiny and that scheme should make onsite and not offsite provision for affordable housing. There is no exceptional case justifying off site provision. The value of affordable housing provision should be significantly in excess of the £120,000 proposed.
17. Parking - the supporting documents recognise that there will be at least a "7 car overspill" from the development. Parking is already at capacity in the area and this would require significant consequential changes to parking arrangements in Broadway Gardens which will disadvantage existing residents.
18. Services - we are concerned by the lack of clarity over the access to the rear of the site which services other properties. There is also a lack of certainty about the future of both the bus stop and the post box which are both located in front of the site.
19. For these reasons we object to this planning application which we believe will harm the setting of Mitcham Cricket Green Conservation Area, harm the setting of the listed Burn Bullock and be in conflict with development plan policies CS14, DM D1, DM D2 and DM D4. We ask that planning permission is refused and would welcome an opportunity to work with the applicants in developing a more appropriate scheme.