



**AMENDED PLANS FOR DEVELOPMENT OF FORMER KWIKFIT SITE, 360-364  
LONDON ROAD  
Application number 19/P4072  
January 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 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 24 flats and 407 sq m of commercial/retail space in the context of the site's:

- prominent location in Mitcham Cricket Green Conservation Area for which it acts as a gateway
- proximity to important listed and locally listed buildings that make a positive contribution to the character of the Conservation Area
- earlier proposals for 22 flats and 290 sq m of commercial space
- proposals for the development of the "car wash" site at 370-374 London Road
- revisions to national Planning Practice Guidance and publication of the National Design Guide since the 2016 planning consent
- relevant development plan policies, including the London Plan
- the refreshed Cricket Green Charter.

3. We have made previous representations on planning applications for this land. We agree with the analysis in the Conservation Area Appraisal and Management Plan that the site currently makes a negative contribution and support its development for mixed use. We objected in the strongest terms to more modest proposals granted consent in 2016 which we considered unworthy of the Conservation Area. We subsequently made representations for the site to be removed from the Conservation Area if these plans were implemented. Notwithstanding the earlier consent the onus is

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on the new applicant to demonstrate that the proposals will preserve or enhance the Conservation Area.

### Community engagement

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 not engaged with the local community prior to or following submission of the planning application. This is in contrast to the previous applicant who met with us to discuss the plans. This planning application should not be looked on "*more favourably*".

5. The size and prominence of this site in a critical part of the Conservation Area demands the most sensitive treatment and the highest quality of development. Our review of the current proposals indicates that the development is not suitable and should be refused because:

6. Excessive height, bulk and mass - the overall scale and bulk of the development is too large for this site – it will overwhelm neighbouring buildings and compete with rather than complement the surrounding townscape which is identified in the Appraisal and Management Plan as making a positive contribution to the Conservation Area.

7. There is no precedent for a building of this mass and floorplate in the local area, as the Design and Access Statement demonstrates:



8. The proposals sit uneasily alongside both the existing frontages and backland developments; notably the modest 1930s residential dwellings in Broadway Gardens, Highfield Court flats and the important group of adjacent buildings along London Road – this is clearly illustrated by the awkward relationship with the chimney stack for 356 London Road and the way the proposals will overlook housing in Broadway Gardens and Highfield Court.

9. We believe 356 and 352 London Road provide a more appropriate reference point for the height of development on the site than 354 London Road if it is to avoid damaging the positive contribution this assemblage of buildings makes to the Conservation Area. The development will be a significant imposition on the key view from Mitcham cricket ground and damage its setting and that of the Grade II listed Burn Bullock by virtue of its scale and the poor quality elevation facing London Road.

10. The cumulative impact of this development alongside that currently proposed for the adjacent "car wash" site will create an overbearing elevation along London Road which will damage the streetscape at this critical juncture with the Conservation Area and within the settings of both the Grade II listed Burn Bullock and White Hart.

11. Design quality - the design approach is inadequate for such a sensitive and prominent location and for a building of this scale. The design requirements for new development have been strengthened since the 2016 planning consent with revisions to Planning Practice Guidance and publication of the National Design Guide. For the reasons outlined below the proposals fail to meet the expectations at least half of the National Design Guide's characteristics. It fails to meet the characteristics for Identity, Built Form and Movement, Public Spaces, Homes & Buildings and Lifespan and we have questions over its compliance with the characteristics for both Uses and Resources.

12. The proposals fail to respond to the rich character of the surrounding neighbourhood and will not add positively to the Conservation Area. Despite amendments made since the Red rating from Merton Council's Design Review Panel, the overall impression is of an oppressive, heavy, structure which imposes itself on the neighbourhood. Intrusive, angled, open balconies on the two key elevations facing Mitcham cricket ground and at the corner with Broadway Gardens are fatal design flaws and the five storey service core presents an incongruous vertical grey terracotta column. The elevation at the corner of Broadway Gardens is particularly unsatisfactory, presenting a cluttered array of design elements which sit uneasily together:



13. The scheme presents significant elevations that lack design detail beyond aluminium surrounds and steel balustrades. The comparison with the rich detail and interest in the materials and brick and other details of the surrounding buildings is stark.

14. There is uncertainty over the quality of bricks, finishing and windows proposed and there is clear evidence of efflorescence in nearby developments along London Road which needs to be avoided. It is proposed that the colour of bricks matches that of adjacent buildings but there is a lack of detail as to how this matching will be achieved and what account will be taken of weathering. The images provided do not show any match with the darker and more variegated existing brickwork of existing buildings:



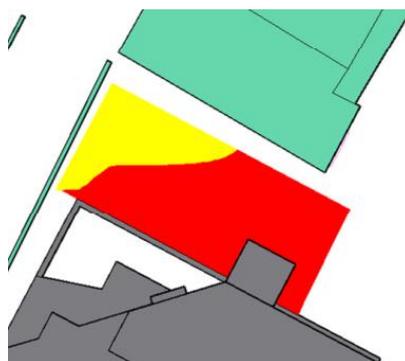
15. Any planning consent should be conditional on ensuring detailed samples are provided, which also address weathering, as for the recent consent for the nearby Cricketers.

16. The scheme includes a number of single aspect flats in conflict with London Plan (intend to publish version) Policy D6 which states that "*Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.*"

17. Commercial space - there is uncertainty over the future use of the proposed commercial/retail space which may remain empty and not provide an active frontage at street level – this is illustrated by the failure of the proposed retail on the ground floor of Justin Plaza nearby and its subsequent use for residential. The same potential users – The Co-op – were involved in the residential conversion of Justin Plaza. The promised retail space was not taken, either by the Co-op or any other company, and was subsequently converted into flats. This should not be allowed to happen again. Any planning consent should be conditional on the ground floor being brought into active use for retail or business use before the residential use can commence.

18. Parking – both this and the prospective development of the "car wash" site are car parking free with only requirements for disabled parking being met. Experience with car ownership levels in recently constructed flats elsewhere on London Road suggests the parking provision is inadequate and will place extra parking pressure on surrounding roads already at parking capacity. The cumulative impacts need to be fully assessed before any determinations.

19. Lack of landscaping - the proposals take a limited approach to green landscaping and planting. The proposed "*communal green space*" lacks detail beyond "*appropriate planting*" and any clear function. The information provided with the application shows it will be heavily shaded (shown in red below) for much of the year:



20. Affordable housing – the plans make no provision for affordable housing and justify this on the grounds of a lack of viability. We dispute this for what is a cleared site in an increasingly attractive area for home buyers where the price of similar flats nearby continues to rise. We believe the viability study should be subject to independent scrutiny and on-site affordable housing provided.

21. Sustainability – The application is supported by limited information on its sustainability credentials and lacks targets, such as achieving Home Quality Mark and the equivalent of BREEAM Excellent/Outstanding albeit the ground floor scheme is below the BREEAM threshold. It is unclear whether the renewable energy technologies and other measures described in the supporting documents are commitments or aspirations. The overall approach does not meet the expectations for such a significant development in the Conservation Area or present an appropriate response to the climate emergency.

22. Visual clutter - management controls over the use of the open, intrusive, domestic balconies will be inadequate to prevent clutter which will seriously damage the visual integrity of the scheme and the character of the Conservation Area in this location – this view was shared by the Inspector in an appeal relating to the redevelopment of the nearby Cricketers.

23. Local investment - there is a lack of commitments to investment in the local area, including necessary improvements to the junction of Cricket Green and London Road at the White Hart and the management and maintenance of the nearby open spaces.

24. For these reasons we object to this planning application which we believe falls 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 in conflict with development plan policies CS2, CS8, CS14, DM D1, DM D2, DM D4, DM T2 and DM T3 and will harm the Conservation Area. We ask that planning permission is refused.