



PLANS FOR DEVELOPMENT OF RALEIGH GARDENS CAR PARK
Application number 19/P4048
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 36 rented flats on Raleigh Gardens car park in the context of:

- the site's prominent location in central Mitcham
- the proximity to Mitcham Cricket Green Conservation Area, including the sensitive relationship with Glebe Court
- Merantun's responsibilities as a local authority development company
- relevant development plan policies, including the London Plan
- the refreshed Cricket Green Charter.

3. We have sought to engage with the emergence of Merantun Development Limited (Merantun) as Merton Council's development company and made representations on emerging plans for the site. We welcome the establishment of Merantun and the opportunities it presents to improve the quality of development across the Borough and to generate resources for investment in public services.

4. We are confident that Merton Council is aware of and sensitive to its dual responsibilities as both applicant and decision maker in respect of this application. This demands the highest standards of propriety and public confidence that the application will be considered fairly and as if it were submitted by a private entity.

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Community engagement

5. 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 repeatedly shown it is not interested in demonstrating good practice in the way it operates and engages with the local community. This is despite its role as the local authority's development company. The public was excluded from the first review of plans for the site by the Design Review Panel as they were considered not to be local authority proposals. We strongly contest this. The public was permitted to attend the second Design Review Panel despite different officers providing conflicting advice as to whether the plans were registered. The plans that are now being considered have different reference numbers to those considered by the Design Review Panel and it remains unclear what differences exist because the plans shown to the Design Review Panel were never made available beyond that meeting, despite it being held in public, and the plans therefore being a matter of public record.
6. Merantun held two poorly attended exhibitions of the plans. These were announced with 48 hours' notice at the height of the summer holiday season and failed to make any of the materials available online. This is worst practice. It is worse than that we have experienced from private developers who share plans prior to a planning application being submitted and was despite our representations to provide good advance publicity. The scheme's architects and an officer jointly employed by Merton Council (as Head of Future Merton) and Merantun (as Design Director) attended our Open Meeting in August 2019. This presented what was described as a final scheme and provided no opportunity for local people to be involved in its evolution. The quality of presentation from the architects and their lack of understanding of both the context and the detail of the site were shockingly bad. The plans received strong criticism for the reasons expanded on in these representations.
7. The Statement of Community Involvement states that the comments made at our Open Meeting were "*generally in line with comments received from members of the public during the public exhibition events*" and yet it also summarises feedback from the exhibition as being that "*the design of the scheme was mostly well received*". Both statements cannot be true. An extract from our record of the Open Meeting is below and this shows strongly critical views expressed. It also records a claim made by Merantun that there are no adverse sunlight/daylight impacts from the scheme on Glebe Court that is not supported by the information provided with the application.
8. The Statement of Community Involvement states that only two emails were received in response to the exhibited plans. We know this is not the case, not least because we provided detailed comments by email to Merantun's Design Director and the generic Merantun email address on 1 September 2019. This is not referenced in the Statement of Community Involvement.
9. We consider the Statement of Community Involvement's conclusion that "*Overall, there appeared to be a good degree of local support for the proposals*" to be a fundamental distortion of the truth. We ask that the evidence presented is disregarded and a revised Statement of Community Involvement is requested prior to consideration of the proposals.
10. Our review of the Invitation to Tender documents for organisations to develop and deliver the schemes for Merantun also shows that there is no reference at all to either "community" or "consultation". This has had inevitable consequences which are now becoming apparent. The chosen architects were unable to avoid using jargon or communicate their proposals in plain English at our August Open Meeting and displayed a limited understanding of the sites, including errors of fact.

11. Merantun has consistently failed to meet its own timetable for the preparation of its plans and has taken much longer than originally planned. This time has not been used effectively to engage with the community which has been provided with occasional, brief, insights into the evolution of the scheme. Despite the protracted period for preparing the planning application it was submitted in late December meaning the main period for public consultation coincides with the Christmas break.

12. Given this experience and the limited and poor quality of community engagement we do not believe this planning application should be looked on "*more favourably*".

Planning considerations

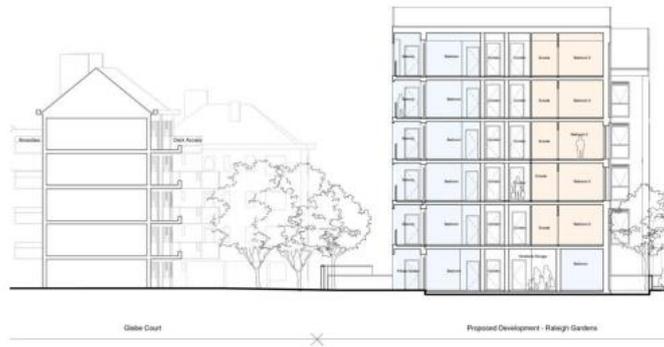
13. Raleigh Gardens is a prominent site adjacent to Mitcham Cricket Green Conservation Area. The development has profound implications for Glebe Court which makes a significant and positive contribution to the Conservation Area. We would support a modest mixed use development of the site setting high design standards for Mitcham's centre and with enhanced planting, landscaping and public realm. As proposed, the plans need a fundamental rethink. They singularly fail to respect their context and introduce a massing and height that is alien to the area. The scheme damages the setting of the Conservation Area and harms Glebe Court. Planning permission should be refused.

14. Land use – We do not support the exclusively residential use of this strategic site in Mitcham's centre. The site demands an active frontage that might best be provided by retail uses linking the retail parade along London Road with the major supermarket on the corner with Western Road. This would better meet the mixed use intentions of Policy CS2 "*To improve the overall environment of Mitcham town centre by providing quality shopping, housing, community facilities and good transport links*" than a solely residential development. Emerging Local Plan Policy N3.2 is even stronger in its support for mixed use development by "*Improving the quality and mix of all tenures, in particular supporting homes above shops in the town centre.*"

15. 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 with severe implications for both Glebe Court and the modest two storey dwellings along the remainder of Raleigh Gardens. It will establish a damaging precedent for the future of Mitcham's centre that will irreversibly harm the opportunities to retain and enhance its distinctive village character. The scheme appears more driven by a desire to maximise financial return than respond to and enhance its context. Our concerns are shared by Merton Council's Design Review Panel which concluded, in giving the scheme an Amber rating, that the "*site was overdeveloped*" and querying its height and/or use of a pitched roof with "*little precedent*" in the area. It is notable that where pitched roofs do exist locally on residential development they do not present the gable end to the main street elevation as the most prominent design element. Those examples which do exist comprise mixed use development with retail use on the ground floor.

16. Harm to Conservation Area and Glebe Court - We share the view of the Design Review Panel that the scheme will create a "*canyon effect*" in its relationship with Glebe Court. This will also remove any opportunity for the space between Glebe Court and the development site to be enhanced for the local community.

17. Glebe Court is and should remain the primary building in the area. Its height and mass should be respected and any building in its environs should be subservient. As this diagram shows the reverse is the case:



18. Glebe Court is a much admired development set in a well maintained landscape which has recently been included in the Conservation Area and which provides ample sources of inspiration for what might be developed on Raleigh Gardens car park. We regret that the opportunity to be inspired by its architecture has been missed and the effect is to damage its significance as a local heritage asset. We strongly contest the claim in the Design and Access Statement that *"The typology and height of the proposal responds to the existing Glebe Court buildings."* This is manifestly not the case and further undermines trust in the supporting information and design process for the application. The Design and Access Statement's visual analysis of the impact of the scheme is inadequate in not providing an assessment of the impact on the relationship with Glebe Court and the Conservation Area. In so doing it fails to provide the heritage assessment necessary to consider the application.

19. The negative impact of the scheme on Glebe Court extends beyond the visual relationship. The scheme's Daylight and Sunlight Assessment concludes that a significant number of windows and rooms in surrounding properties will be adversely affected by the proposals. For Glebe Court the impacts are very significant. Only 45% of the windows facing the new development would meet official guidelines for daylight and a shocking 29% would be *"subject to noticeable losses"*. This level of impact is wholly unacceptable.

20. Design quality - the proposed building lacks design distinction and its quality does not meet the standards required for such a prominent location and for a building of this scale. It fails to respond to the rich character of the surrounding neighbourhood, including the adjacent Glebe Court, and introduces design elements, such as gable ends, without local precedent. The design treatment is poor and universal. There is next to no contextual analysis included in the Design and Access Statement which is inadequate for a scheme of this scale and significance.

21. We support the predominant use of brick but the approach lacks detail and craft. This results in monolithic and relentless elevations and given the scale of the building it results in an overbearing presence.

22. The comparison with the rich detail and interest in the materials and brick and other details of surrounding buildings such as Glebe Court is apparent.

23. We support the intention to break up the structure through provision of two buildings and a linking core/circulation space. We do not believe this is achieved by the design approach adopted which, despite the attempt to provide a more glazed appearance, presents a single elevation to Raleigh Gardens rather than two distinct buildings (see below). The core/circulation needs a distinctively different design treatment in order to visually separate the two buildings. The building will also be seen as a whole rather than two separate blocks in the majority of even semi-oblique views from Raleigh Gardens.



24. 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, including through appropriate planning conditions on future maintenance.
25. The scheme emphasises the importance of providing direct access to the street from those flats fronting Raleigh Gardens as a means of activating this frontage. In reality just two of the 36 flats have street entrances and the impact is marginal. We are concerned by the lack of activation of this key frontage at street level.
26. Landscape and planting – We support the intention to retain and enhance a green buffer around the new development and to strengthen the boundary with Glebe Court. The benefits are fundamentally undermined by the scale of development proposed which both occupies too much of the site and diminishes the positive impact of planting and existing trees by virtue of its excessive height.
27. We question the proposals for low brick walls to enclose the development. These add further to the relentless use of brick materials and miss the opportunity to provide significant hedges that would perform multiple functions, including reducing air pollution associated with the busy one way road in front of the site.
28. The scheme lacks adequate assurances as to the future maintenance and management of the associated landscape and planting beyond bland statements that the planting will be "hardy".
29. The scheme includes excessive lighting which will cause unnecessary light pollution and have a particularly severe impact on views from Glebe Court. We do not support the use of 17 uplighters for the trees at "focal points". The scheme clearly does not have 17 focal points and any uplighters should be limited to the single feature "Harvest Gold" tree in the north east corner of the site.
30. Affordable housing - the plans make no provision for affordable housing and instead proposes that this is provided on an alternative Merantun site and at levels below those necessary to be policy compliant. Policy CS8 is clear in stating that "*Only in exceptional circumstances will the council consider the provision of affordable housing off-site or financial contributions in lieu of provision on-site and this must be justified.*" The Planning Statement makes no effort to justify exceptional circumstances and simply states that "*the proposals are in accordance*" with Policy CS8. Emphatically this is not the case. It may be operationally convenient for Merantun to separate affordable and market housing and it is chance that it is bringing forward four different sites at the same time but this is not a relevant planning consideration in determining where affordable housing should be provided. The single merit of bringing forward four schemes at the same time is that it may reduce build costs and so increase the viability of the scheme enabling the provision of more affordable homes. There is no case made

for not providing affordable homes for rent in the scheme and this provision should be required. We believe the viability study should be subject to independent scrutiny.

31. Parking strategy - Experience with car ownership levels in recently constructed flats elsewhere in the areas suggests the zero car parking provision is inadequate and will place extra parking pressure on surrounding roads already at parking capacity. A desktop analysis of Mitcham's parking capacity is inadequate given the public resistance to using capacity in St Marks Road multi-storey car park. The cumulative impacts need to be fully assessed and the plans need to demonstrate the implications for Mitcham's parking strategy of losing Raleigh Gardens as a car park. The priority development site for Mitcham's centre is to replace the underused eyesore of the multi-storey car park with a significant development suitable for the commercial centre.

32. Servicing and access - We agree with the expectations of the site allocation in the emerging Merton Local Plan that servicing impacts should be mitigated and site access should be provided from the side road. Instead, the proposals include access for two parking spaces and for refuse collection direct from Raleigh Gardens. We also note that the three parking spaces for wheelchair users and the three flats designed for wheelchair use are not well located to each other with one user having to traverse the full width of the site from south east to north west to get access.

33. Sustainability - The application is supported by inadequate information on its sustainability credentials and lacks targets, such as achieving Home Quality Mark. It is unclear whether the measures described in the supporting documents are commitments or aspirations. No positive use for the significant roof area is proposed. The overall approach does not meet the expectations for such a significant development in the centre of Mitcham or present an appropriate response to the climate emergency.

34. 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 harms both the setting of Mitcham Cricket Green Conservation Area and Glebe Court. The proposals are in conflict with development plan policies CS2, CS8, CS14, DM D1, DM D2, DM D4 and DM T3. We ask that planning permission is refused.

Note of Mitcham Cricket Green Community & Heritage's Open Meeting discussion of Raleigh Gardens proposals, 27 August 2019

- 1. Raleigh Gardens** comprised 36 flats. Limited parking followed the borough trend. Height of build was explained. Existing trees would be "kept where possible". Questions and comments followed examination of the plans.
- 2. **** drew attention to relationship with Glebe Court and small dwellings adjoining potential site. Design Review Panel instructed revisit to Glebe Court. *PMcG said that tests for light & sunlight showed no adverse effect on Glebe Court.*
- 3. **** countered the above comment by stating new build was too high, too close to Glebe, and chosen brick was too dark – all out of local context.
- 4. **** agreed with **, finding the proposed structure oppressive and overbearing.
- 5. **** wondered why the maximum 5-storey surrounding buildings had been ignored when designing this bulk. He also reckoned lack of car spaces impractical which would lead to fly parking throughout the area.
- 6. **** asked why the original plans for 22 flats had increased by 66%, and queried why data re space usage of car park had not been made public. *PMcG said the original #22 was "off the top of the head". He could not answer the data point.*
- 7. **** backed the comments about car parking, pointing out that the municipal car park at St Marks Road was not the answer as it unsafe for public. ** proffered an idea to switch the two car parks – build on St Marks and leave Raleigh Gdns.
- 8. **** pointed to Croydon Council's failure to go down the private company route for affordable housing, and that Merton did not heed the warning (Feb 2019). Thought that such a mass of flats set a dangerous precedent in this prominent position. *PMcG said the LBM policy on affordable housing had been followed*

[Initials of attendees have been redacted and replaced by **. PMcG = Paul McGarry, Merantun Design Director (& Head of Future Merton)]