



**AMENDED PLANS FOR DEVELOPMENT OF LAND BEHIND 8 PRESHAW CRESCENT  
FOR 9 FLATS  
Application number 19/P4118  
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 9 flats in a new three storey development on this garden site in the context of:

- the site's location in Mitcham Cricket Green Conservation Area
- the pre-existing amenity and wildlife value of the site, including mature trees pre-emptively felled ahead of previous planning applications
- the constrained residential location with highly restricted access
- the opportunities for improved access and through routes to increase local permeability
- the site's planning history and previous grounds for refusal of residential development
- 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 and are not opposed in principle to some development in this location. Nevertheless, the proposed 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.

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## Community engagement

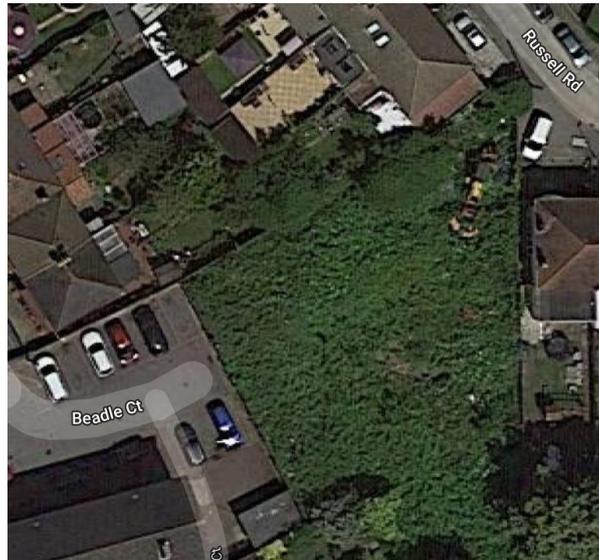
4. The National Planning Policy Framework states that “*applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*” (paragraph 128). The applicant has not engaged with the local community prior to or following submission of the planning application. The references to community meetings and meetings with former Councillor Ian Munn and with Mitcham Cricket Green Community & Heritage relate to a much earlier application over three years ago. This planning application should not be looked on “*more favourably*”.

## Trees and landscaping

5. The site benefitted from a significant number of mature and healthy trees (see photos below). These were pre-emptively felled in May 2015 without consent despite their location in the Conservation Area. Merton’s Tree Officer informed us that the matter would be dealt with as part of the process for considering the planning applications for development of the site and in correspondence with a local resident in December 2016 said “*I have written to the owner about this matter, and he is now aware that the council expects new replacement trees to be planted.*”



6. Planning applications in 2016 and 2017 were either not progressed or refused and so this matter remains unresolved. As this image from Google Maps shows the site remains without trees and a visit shows it is now largely bare earth.



7. The Design and Access Statement reconfirms the intention of the owner to address the issue in stating that *"We are aware that the site itself did have additional trees that were removed without consent from the Council, in this conservation area during the Pre-App period. This unfortunate event happened when the owners asked for the site to be cleared of undergrowth so that the topographical surveyor could complete his work without restriction. This occurrence is an embarrassment to the applicant and all involved with developing the proposals for this development and something that we all wish to put right as part of the development process."*

8. This embarrassment continues. We have reviewed the tree planting and landscaping proposed and concluded that it does not provide appropriate compensation for what has been lost. The tree proposals for the site are meagre and inadequate. They comprise modest proposals for:

- Sorbus Aria Lutescens (3.5m high)
- Pyrus Salicifolia Pendula (3.0m high)
- Aesculus Carnea Briotii (3.0m high)
- Betula Purpurea (3.0m high)
- Laburnum Wateri Vossii (2.5m high)

9. The CAVAT value of these small standards is a fraction of that for the trees which have been lost. The development should provide for trees of equivalent CAVAT value to those lost as a minimum for permission to be granted. This should be supported by planning conditions to secure the long term maintenance of trees and the wider landscape. This would discharge the owners of their recognised responsibilities and address their embarrassment. If instead it is considered appropriate for the plans to proceed with the loss of such a large area of the site to development and that mature trees of equivalent CAVAT value cannot be accommodated then they should be provided within the adjacent streets and other public realm.

10. The species and proposed locations are also inappropriate. Many are planted less than 2.5m from the new building. A poisonous Laburnum is just 2m from the building.

A pear and whitebeam are shown as being planted under existing trees on neighbouring property. The site layout also requires significant interventions in the management of neighbouring trees which could have been avoided through a more thoughtful design approach. More space could be provided by reducing the scale of the scheme and increasing the proportion of open land to allow existing trees to be left uncut and provide space for more mature trees to be planted.

11. The shrub species proposed are also inappropriate (including ivy) and there is no specification or planting density provided for the proposed planting beds or acknowledgment that Gaultheria likes acid soil.

12. The design should also allow for planting within the parking area and provide for a hedge border.

#### Other planning considerations

13. We recognise the proposals as a modest improvement on previous plans by virtue of their reduced height and new layout. Nevertheless, we believe they fail to preserve or enhance the Conservation Area and are in conflict with development plan policies for the area. In addition to the failure to provide for adequate tree planting or high quality landscaping we object to the proposals on the following grounds:

14. Loss of open land - The proposals 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. There is a need for a significant redesign to allow for much more open land. The proposals provide very little by way of open space or additional greenery and much of the site is converted to car park.

15. Excessive height, bulk and mass - The proposals intensify development in an already congested area and damage the outlook from neighbouring residences at significant loss to local amenity. The revised plans lack evidence that they will not have an unacceptable impact on local amenity and nearby residential properties. There is, for example, no information provided on the daylight and sunlight impacts. The proposals both cram the site and offer a poor access which is much less appropriate than the first scheme.

16. Design quality - The design approach fails to respond to the rich character of the surrounding neighbourhood and will not add positively to the Conservation Area. Development of green space in the Conservation Area demands a building of the highest design standards. What is proposed is everyday and ubiquitous and no examples of local references of sources of design inspiration are provided in the Design and Access Statement. There continues to be a lack of any contextual study, despite this being cited as a gap in the officer's report refusing planning consent for the previous scheme. The flats include intrusive balconies and the honeycomb detailing and mixed shades of grey (or brown) bricks and roof tiles combined with brown edging has no local references. The accompanying images are inconsistent in their expression of the colour of the materials to be used which varies from light brown to grey (see images for the same building below).

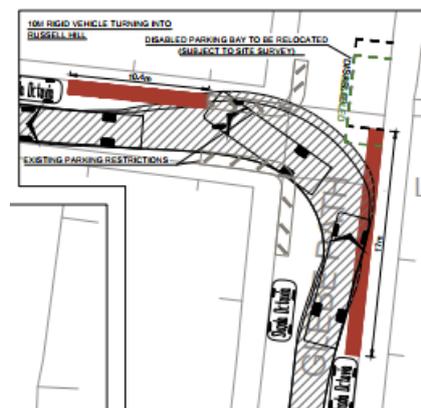


17. A significant amount of what is currently garden is given over to surface car parking. The buildings lack greenery and there is no provision for either green walls or a green roof by way of compensation for the loss of existing green space.

18. Local access - 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 Avenue 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 increasing passive surveillance throughout the area. 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.

19. Servicing and construction - There are an unusually large number of 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 plans are accompanied by a Framework Construction Management Plan that 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. The swept path analysis shows vehicles mounting pavements. 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 shows that service lorries will be required to mount the pavement at the junction of Glebe Path and Russell Road and that the access is highly restricted and unsatisfactory. This is even where enforcement of existing parking restrictions is assumed. Local residents strongly challenge the assumptions on which the assessment is based. 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.

20. Affordable housing – the plans make no provision for affordable housing and instead propose making a financial contribution. 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 satisfies"* Policy CS8. Emphatically this is not the case. We believe the viability study when provided should be subject to independent scrutiny.

21. Sustainability – The application is supported by limited information on its sustainability credentials and lacks targets, such as achieving Home Quality Mark. It cites Code Level 4 despite this not now existing. This approach does not meet the expectations for development of open land in the Conservation Area or present an appropriate response to the climate emergency. Details of the proposed sustainable urban drainage system and how it will be maintained are unclear.

22. We must also comment on the poor quality of the information presented with this application. Many of the architectural drawings are accompanied by images of people and animals that are out of scale. It is also remarkable that after three years the Design and Access Statement remains largely unchanged from that presented in 2016, including basic errors such as the conflation of Wandle Valley Regional Park with a SSSI, an error which we have pointed out in four different sets of public representations.

23. 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 O2 and DM T2 and will harm the Conservation Area. We ask that planning permission is refused.