



DEVELOPMENT AND EXTENSION OF FORMER MITCHAM FIRE STATION
Planning application 20/P0801
April 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 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. The former Mitcham fire station is a locally listed building in one of the most prominent locations in Cricket Green Conservation Area. We share the view in the Heritage Statement that *"the locale is one of the most historically significant parts of the overarching conservation area"*. The old fire station is held in high affection and is part of an important assemblage of buildings on the "island site" of Lower Green West, including the locally listed Vestry Hall and the Grade II listed war memorial. The site faces significant design challenges given its high visibility from different locations around Lower Green West and the physical constraints of registered Town Green and land in the ownership of Merton Council which immediately borders the building.

3. The significance and sensitivity of the location is reflected in the Cricket Green Charter which states that *"any new development facing the cricket ground and other open spaces at the heart of Cricket Green should be of a standard that could warrant listing within 30 years."* This is the standard against which we have assessed the proposals for conversion and extension of the former fire station to provide 9 flats for sale on the open market. We objected strongly to earlier plans (19/P2688) and welcomed their withdrawal in the face of unresolvable issues about their scale and design quality.

4. We appreciated the opportunity provided by the applicant for us to comment on the new proposals shortly before they were finalised. That notwithstanding, we were given just a few days to comment and only provided with a limited set of drawings which lacked information on key issues, such as parking, landscaping, lighting, servicing, materials and sustainability as well as the Design and Access Statement. Despite repeated requests and our involvement in discussions over the future of the site since 2013 we were not engaged in the design development. Our views are incorrectly attributed in the Design and Access Statement to those of a *"local residents association"* when we are a charity addressing public and not private interests. We are not a residents association. The National Planning Policy Framework states that *"applications*

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

that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot" (paragraph 128). The poor quality of early engagement, and a misunderstanding of our role, means that this is not an application that can be looked on more favourably.

5. We recognise the building's development potential and made appropriate representations on the review of Merton's Local Plan.

Former Mitcham Fire Station



Current uses – Vacant, former fire station

Preferred future use – Community arts and workspace (D1), ancillary food and drink

Existing planning & other issues – Mitcham Cricket Green Conservation Area, Local List, Archaeological Priority Zone, Wandle Valley buffer, setting of listed buildings (Grade II Elm Lodge) & structures (Grade II war memorial), adjacent to locally listed Vestry Hall, Adjacent to Open Space and Metropolitan Open Land

Future opportunities –

- Prime community asset at heart of Conservation Area on island site
- Opportunity to strengthen physical and functional relationship with Vestry Hall
- Retention of external appearance and engine shed
- Mix of community uses including a flexible cultural, arts and performance space, café & bar facilities, meeting rooms and the option for incubator space for creative and arts-based business
- Merton Council has a right of first refusal on disposal of the building and controls its access to the public highway

6. We do not support sole residential use of the building and believe it should comprise a mix of uses including D1 and/or D2. Any scheme also needs to address the relationship with both the apron, which serves as an important physical reminder of the fire station's purpose, and the Vestry Hall. Respect for the setting of the recently listed war memorial is also essential and this includes the space required to support the annual Remembrance Day services. We are also looking for design approaches that retain the integrity of the engine bay that is a key significance to be protected in this locally listed building. The building provides an ideal opportunity for securing mixed use and would be a good location for a community use. We have previously developed proposals with a successful community arts company for its repurposing as a community arts centre.

7. We welcome the improved quality of the latest plans which are more appropriate to their sensitive context and less visually intrusive. The efforts to mimic the fire station doors and to replace uPVC windows with aluminium frames are welcome. Nevertheless, the current plans do not adequately address the sensitivities of the location or secure an appropriate future use and we object to the plans on the following grounds:

- A failure to provide for mixed use of the existing building, ideally with community D1 and/or D2 uses securing public access to, and the integrity of, the engine bay
- By increasing the gross internal area by 83% (from 359.5m² to 657m²) the proposed extension is disproportionately large for the modest proportions of the original locally listed building and changes its scale and character and its relationship with neighbouring buildings. It also involves demolition of 26m² of the existing building and as a result the original fire station makes up only half of the final building (333.5m² out of 657m²)
- A failure to respect the integrity of the engine bay by not retaining its scale and volume within the converted building and so causing significant harm to the character and significance of the locally listed former fire station
- An intrusive new terrace/balcony to be added to the front elevation which while reduced in size from previous plans will still harm the historic significance of the key frontage of the locally listed building

- Damage to the visual quality of Lower Green West as a result of new lighting, bin stores, hard surfaces and parked vehicles
- An unresolved conflict between the requirement for public access up to the edge of the building (including along a public right of way) and ground floor residential use given there can be no defensible space for ground floor residents.
- Proposals for permanent external lighting which will repeat the problems evident on the neighbouring Cricketers flats. We welcome the applicant's willingness to "accept a condition for details of external lighting if permission is granted" in responding to our comments on the pre-application plans and would expect there to be such a condition if consent were given. This should require as a minimum that any external lighting is minimal, designed to ensure minimum spillage and pollution and movement activated so it is only occasionally visible
- The inappropriate location of the main entrance to the building along the elevation facing the registered Town Green and Grade II listed war memorial which also conflicts with the public right of way immediately adjacent to the building
- Harm to the integrity of the apron through its use for bin stores and proposed use for vehicle parking which are both visually intrusive and obstruct the key elevation of historic interest at the front of the former fire station. Any planning consent should include a condition requiring measures to integrate servicing and bin stores with the adjacent Vestry Hall and/or Cricketers
- A failure to address the awkward relationship with the Vestry Hall which leaves an unresolved space between the two buildings
- Further harm to the relationship between the buildings on Lower Green West which is described by the Conservation Area Appraisal and Management Plan as having an "informal, undefined character". This includes loss of the physical separation of the Vestry Hall from its neighbours in the key view from Mitcham cricket ground where the carefully defined gap secured after years of debate on successive planning applications for The Cricketers flats will be lost to a two storey extension – as evidenced by a comparison of the plans and a photo of this key view



- A lack of assurance that public access across the apron will continue in perpetuity, especially given the unauthorised enclosure of a significant area of the apron by hoardings prior to the planning application being submitted

8. We believe the proposals will have a negative impact on the Conservation Area, damage the setting of the listed war memorial, cause substantial harm to the locally listed former fire station, harm the locally listed Vestry Hall and registered Town Green and conflict with development plan policies CS2, CS14, CS20, DM D1, DM D2, DM D3 & DM D4. We ask that planning permission is refused.