



**DEVELOPMENT OF FORMER SPARROWHAWK YARD FOR 25 FLATS**  
**Application number 20/P1060**  
**May 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. The former Sparrowhawk yard stands in a prominent location on the border of Mitcham Cricket Green Conservation Area, adjacent to registered Town Green and across the road from the significant open area of Three Kings Piece (erroneously identified as Mitcham Common in the supporting material). Its immediate development context is dominated by 1930s suburban housing.

3. We do not object to the principle of residential development which is an appropriate use for this previously developed site consistent with Policy CS9. It is a large site and one where the highest standards of design should be expected and other public benefits should be provided which enhance the area.

4. These high standards were not provided by the previous proposals for the development of 29 flats, rejected by Merton Council in June 2018 and on appeal in July 2019 given the *"harmful effect the works would have on the character and appearance of the area and the flats would not provide adequate living conditions for prospective occupiers."*

5. We have reviewed the current proposals in light of this sensitive location and the planning policy context. The revised scheme is welcome for its additional design detail, use of recessed balconies and for having dual aspect flats throughout. Nevertheless it is only marginally less imposing than the previous, rejected, scheme and has not addressed many of the previous grounds for refusal.

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6. We believe it:

- remains excessive in its massing and height such that it will be as prominent from Commonside East as the rejected scheme and fail to respect the context of 1930s suburban housing – the scheme is only marginally lower and retains the same two key flaws of (1) a flat roof above the ridge line of 145 Commonside East and (2) an incongruous relationship with dwellings in Hallowell Close which resulted in dismissal on appeal
- intrudes negatively on the Conservation Area, notably Three Kings Piece, creating an urban mass on its boundaries and views to the north (which are only partially mitigated by the embankments of Beehive Bridge). It is notable that the information supporting the application still only addresses views out from the site (e.g. key map in section 2.6 of Design & Access Statement) and no evidence is provided of views looking towards the development site from the surrounding Conservation Area and Town Green despite this being a key planning consideration. Further information on these key views is necessary prior to determination if a robust assessment of its impact on designated heritage assets is to be made
- detracts from 145 Commonside East (which is recognised as making a positive contribution to the Conservation Area) by virtue of its overwhelming height, poor elevation and creation of a discontinuity in the streetscape
- fails to provide any affordable homes – see below
- fails to address the impact on local parking – see below
- continues to offer a poor quality blank frontage on its northern and eastern elevations visible by local residents and along Commonside East (below)



- fails to respond positively to its location at the corner of Hallowell Close and Commonside East facing Three Kings Piece with only limited design treatment in turning this corner



7. This is a significant scheme that will impact on local highways and parking. The accompanying documents assume that the parking spaces available locally include the registered Town Green (shown in pink below) along Commonside East running into Hallowell Close. Parking on this strip of land is illegal and the assessment of parking impact should be altered accordingly. Any planning consent should include a requirement to address the illegal use of this area of registered Town Green for car parking.



8. Policy CS 8 requires developments of 10 or more dwellings to provide for a minimum of 40% affordable homes of which 60% should be social rented and 40% intermediate. The plans make zero provision for affordable homes. This is justified on the basis of the deficit shown in the viability assessment. We do not accept the conclusion of the assessment that the scheme is not viable and cannot envisage that the redevelopment of an already cleared brownfield site in a residential area cannot make full provision of affordable homes.

9. The Existing Use Value of the site based on comparing commercial properties in the area plus the house is shown as just over £1,112,000. This gives a Benchmark Land Value, with the addition of 20%, of £1,330,000. The Residual Land Value calculation with 35% affordable housing gives a land value of £300,000, well below the benchmark, and so the assessment concludes that all affordable housing is ruled out. This assessment is flawed by having no assessment of the price of affordable housing. The Land Registry also shows that the site was bought in 2016 for £1,840,000. We also note that Savills has included significant caveats in the report. It states that *"This Assessment has been carried out with regard to the Professional and Ethical standards set out within PS2 of the RICS Valuation – Global Standards 2020 (the Red Book), effective from January 2020"* whilst also recognising significant limitations *"Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. No liability is given to any third party and the figures suggested are not in accordance with the RICS Valuation – Global Standards 2020 (incorporating the IVSC International Valuation Standards), together the 'Red Book', and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such."* Since the calculations have not been undertaken in accordance with Red Book standards they cannot be considered in a viability assessment on the provision of social housing.

10. This is an Archaeological Priority Area and the scale of the development is such that it could impact buried archaeology. We ask that any planning consent is conditional on prior archaeological investigation.

11. We object to the plans and consider them to be in conflict with NPPF paragraph 48 (refusing poorly designed development) and Policies DM D1, DM D2, DM O1, CS8 and CS14.