



**AMENDED PLANS FOR DEVELOPMENT OF RALEIGH GARDENS CAR PARK**  
**Application number 19/P4048**  
**June 2020**

1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs. We made extensive representations on the proposals for developing Raleigh Gardens car park for 36 rented flats in January 2020. These identified a series of problems with the proposals, including multiple conflicts with development plan policies and harm to Mitcham Cricket Green Conservation Area.
2. We have reviewed the amended proposals which, with the exception of the amended roof, have only a minor impact. A number are housekeeping changes to address weaknesses in the original designs which should have been addressed before any external review. The revisions do not address the grounds on which we asked for this application to be refused. Our [January 2020 representations](#) stand.
3. The most significant change is the replacement of a pitched roof with a flat roof. The original Design and Access Statement proudly hails the importance of the *"distinctive pitched roof"* for *"referencing the common roof form seen on Mitcham's high streets and adjacent residential buildings"* and for *"creating variation"* and a *"suitable façade proportion"*. The pitched roof was deemed integral to considerations of *"how the two building elements could be broken down further"*. The Design and Access Statement continues that *"the pitched roof form further breaks down the mass of each building element, and creates an interesting roof line that picks up on a number of buildings in the local context"* and that it *"responds to the roof form of the buildings in the right hand side"* and also that it *"responds to the pitched roofs of the residential development of Glebe Court"*. We were also informed that *"The pitched roof creates generous ceiling heights within the living areas of the top floor."*
4. Despite these stated benefits we are now presented with a flat roof. This means either that the earlier Design and Access Statement was based on a series of false statements or that the amended proposals are inferior for not being distinctive, not reducing the mass of the buildings, lacking variation, creating an unsuitable façade, failing to respect local context, having ungenerous ceiling heights and not responding to nearby roof forms.
5. We do not consider the amended roof form to be successful in resolving the fundamental problems with the scheme. It remains too large for the site and will overwhelm neighbouring buildings. The buildings 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. They establish a

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damaging precedent for the future of Mitcham's centre that will irreversibly harm the opportunities to retain and enhance its distinctive village character.

6. We identified a need for a distinctively different design treatment to the core/circulation space in order to visually separate the two buildings in our January representations. The changes proposed lack distinction and are not successful in breaking up the structure which will be seen as a whole rather than two separate blocks in the majority of even semi-oblique views from Raleigh Gardens.

7. The amended window arrangements to "*add interest*" do not address the fundamental issues with the bulk and height of the proposals. They are symptomatic of the lack of architectural interest and design detail in the scheme and are, at best, superficial.

8. We are concerned that the amended Tree Survey fails to recognise the existing protection for trees located in Mitcham Cricket Green Conservation Area. This is despite the claim that "*Local Tree Preservation Orders (TPOs) and Conservation Areas were researched.*" Remarkably the Tree Survey states that "*There is no TPO or Conservation Area affecting the site.*" This is despite trees T6-T9, T11, and groups G1 and G2 being identified as being within the grounds of Glebe Court which is in the Conservation Area. The Root Protection Areas of many of these trees cross into the development site and we do not believe the measures cited will give them adequate protection. The Tree Survey is also silent on the damaging impact of proposed uplighters.

9. Given these basic errors we do not believe the Tree Survey can be relied upon and determination of the application must await provision of an accurate report.

10. We are also unaware of any updates to the desk-based assessment of the site's archaeological value as required by Historic England given the location in an area of archaeological priority. As Historic England has said "*if you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.*" The absence of more information precludes further progress in determining the application or it should be refused.

11. We maintain our objections to the proposed development. It 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. None of the proposed amendments address these fundamental considerations. We ask that planning permission is refused.