



**EXPANSION OF MELROSE SCHOOL
Application number 20/P2184
September 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. Melrose School is part located in Mitcham Cricket Green Conservation Area and is strategically located between Church Road and London Road Playing Fields and bordered by the historic route of Church Path. Its green and wooded character makes a positive contribution to the distinct character of the assemblage of educational, institutional and office buildings set in landscaped grounds which are a feature of this part of Cricket Green.

3. Merton Council's Planning Applications Validation Checklist (adopted May 2018) requires all developments in a Conservation Area to be accompanied by a Heritage Assessment. No Heritage Assessment has been provided with this application and we have asked Merton Council to confirm it will be made available for public comment before the application is determined. It will be important for the Heritage Assessment to address the impact on local views, boundary treatments, materiality and the wooded character of the school grounds. We understand a Heritage Assessment has now been requested and will review it when available.

4. We are also disappointed by the lack of engagement prior to submission of this planning application. National planning policy states that "*applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that*

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cannot" (NPPF, paragraph 128). No opportunity to "work closely" has been taken and the planning application should not be looked on "more favourably" as a result.

5. We recognise the demand to increase the capacity of Melrose School and support the important contribution it makes to the local community.

6. We have considered the plans for a new teaching block, hall, car park and other works in the context of the Cricket Green Charter, development plan policies and its impact on Mitcham Cricket Green Conservation Area. There are important lessons to learn from the recent expansion of the nearby Cricket Green School on which we made significant representations.

7. The grounds of Melrose School include protective designations as Open Land, Green Corridor and Conservation Area and any development will have a significant impact on the reasons for these designations. This places an additional onus on the applicant to deliver the highest standards of building design and landscape mitigation and enhancement.

8. Our fundamental concern with the plans is that they develop a significant proportion of the remaining open space on the site. This development is in the most sensitive part of the site where it is within Mitcham Cricket Green Conservation Area and it will result in the significant loss of trees and a diminished tree canopy cover. We share the concerns of Merton Council's Design Review Panel which in giving the proposals an AMBER rating recommended a two-storey option was considered "*in order to maintain more open space and improve the general site layout. This also may take pressure off tree loss.*" The Panel also concluded "*further work was needed to ensure any tree re-planting was done in a way that was effective, noticeable and beneficial*". The applicants have made various adjustments in response to other feedback from the Design Review Panel but no changes have been made to the one-storey design. We believe a well-designed two-storey option for that part of the development which already includes a pitched roof above a one-storey building would reduce the area of land developed without any significant additional visual intrusion.

9. We are also aware the site context is changing with proposals coming forward for both Benedict Wharf and Worsfold House involving significant new built development and changes of use. The Cricket Green Charter supports increased permeability in this area and we welcome the intention for a new link between Church Road and London Road Playing Fields that will run between Melrose School and the Worsfold House site. We anticipate future investment will also occur in Church Path and on London Road Playing Fields.

10. The development plans for Melrose School should complement the changing context and improved boundary treatments are one critical opportunity to achieve this. This should combine enhanced planting and high quality physical boundaries. The line of mature trees along Church Path is integral and retaining and enhancing these is a high priority. The scheme creates a new boundary with Worsfold House and the 2.5m Vertical Bar fence proposed is functional in design. There are examples of more sympathetic heritage railings nearby within the Conservation Area. We are also concerned by the narrow dead corridor between the east side of the new primary teaching block and the new fence which lacks an obvious function.

11. We believe the proposals will cause unnecessary harm to the Conservation Area and result in the unnecessary loss of significant trees. Seven trees will be lost without any commitments to the provision of replacement trees beyond a statement that "*it is proposed that on site replacement tree planting is discussed with the local authority*". This is unacceptably weak, especially given that Merton Council is responsible for the trees to be felled, and the plans should include compensatory tree planting that provides trees of greater CAVAT value, along with guarantees for their future maintenance and management from the day they are planted. Such guarantees are the least that can be

expected in light of the most affected part of the site being in the Conservation Area and the plans for the expanded school to include a new "*Woodland teaching area*". It is a contradiction in terms to create a woodland teaching area on a site where the quality and number of trees is being reduced by a local authority which has declared a Climate Emergency. We are also unconvinced that the proposals for log piles, bird nesting boxes, bat boxes and a hedgehog home provides the level of assurance needed that the development will result in biodiversity net gain, especially given the significant loss of trees which provide essential roosting as well as nesting sites. This assertion needs to be independently verified. We would also urge that a number of swift boxes are provided.

12. National planning policy is clear – "*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). Given the significant impacts we have identified and the opportunities for a more sympathetic development we believe planning permission should be refused and an alternative approach brought forward which develops less of the site and does not conflict with Policies CS13, DM D1, DM D2, DM D4 and DM O2 or harm the Conservation Area.