



OLD BANK HOUSE
Planning application 20/P3612
February 2021

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 former 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 Old Bank House plays an integral role in defining the character and appearance of Mitcham Cricket Green Conservation Area (established in 1969). The Conservation Area Appraisal and Management Plan identifies the site as part of a series of buildings which *"creates a strong urban corner, contrasting with the openness of the greens"* and it is singled out as a building *"that makes a positive contribution"* to the Conservation Area. As such it is a recognised "heritage asset".

3. We have considered previous proposals for extending the existing building and converting it to residential use in 2011 and 2012. We have reviewed the revised proposals in the context of the Cricket Green Charter and current and emerging development plan policies for the area.

4. Our primary concern is with the impact of the proposed redevelopment on the character and appearance of Cricket Green Conservation Area. Such development is required to preserve or enhance its character or appearance. We also believe the building should be for a mix of community and employment uses. Our representations on the draft Local Plan identified its critical relationship with the adjacent workshops and seek to safeguard this as a non-residential area including a valued scattered employment site. Nevertheless, we recognise that the Old Bank House is not well served by its current limited use and welcome the opportunity to inject new life into the building. The proposals need to be supported by evidence justifying a change away from community use.

5. There is merit in the overall design of the proposal as it fronts London Road and Lower Green West. It responds to the rhythm of the existing built form and is well proportioned in the manner with which it completes the seemingly incomplete elements of the current building. It will double the floorspace of the existing building.

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6. The design approach can only be successful if the quality of the detail and finish of the two front elevations makes them indistinguishable from the existing building. The proposals are to "match" the existing building and this must be achieved in terms of materials, colour and detailing. While the drawings presented with the plan show the new development replicating the existing building in colour, design, form and build materials, it is a significant challenge to achieve this in reality. The scheme faces an even greater challenge than the adjacent Cricketers flats which were required to colour-match with the bricks used in the Vestry Hall.

7. It will be especially demanding to achieve the necessary standard of match as part of the same building and the match needs to extend to the use of dressed stone as well as brick. This will not be achieved by a standard condition and it will be necessary for the applicants to demonstrate how the materials will weather in an appropriate manner.

8. The difficulty of securing a match is noted even in the much simpler cases of residential extensions where Merton Council's guidance notes that:

"The materials used in any alteration or extension should be related as closely as possible to those used in the original building. For the walls in many cases this is likely to mean seeking to obtain the best match of bricks both in colour and texture. This can be more difficult, particularly where original bricks are old and weathered and in the old imperial size"

Merton Council, SPG Residential Extensions, Alterations & Conversions Para 4.2.1
(emphasis added)

9. The materials condition for the Cricketers flats states that:

"No development shall take place until details and samples of all external facing materials, including windows and doors have been submitted to and approved by the local planning authority in writing. The details shall include a consideration of how such materials may weather over time. The relevant works shall be carried out in accordance with the approved details."

10. The information provided to discharge this condition at the Cricketers was wholly inadequate. Any condition for the Old Bank House should be unequivocal in the standard of supporting information that will be required for it to be discharged.

11. Any planning consent should also include the informative proposed to us in 2019 by Jonathan Lewis as means of ensuring the use of quality materials and finish and to pre-empt problems with efflorescence:

"INFORMATIVE. The Council as local planning authority, recognizes the importance of achieving high standards of site practice and workmanship in the course of construction and acknowledges that this will have significant influence upon the quality of the finished brickwork. The applicant is therefore encouraged to follow the advice set out in the Brick Development Association publication: Good site practice and workmanship (December 2015) <https://www.brick.org.uk/admin/resources/g-good-site-practice-workmanship.pdf> when implementing the development hereby approved."

12. We are content with the proposal to use a line of blue engineering brick between the existing building and the extensions to provide a visual record of the building's evolution.

13. The Old Bank House is adjacent to Grade II listed cottages on London Road. Any construction work relating to the development of the site needs to respect these

buildings and take appropriate measures to ensure no structural or other harm is caused.

14. The existing building includes an important and historic bench mark. It is essential that its significance is recognised and that it is protected during any works.

15. We ask that any scheme is required to undertake an archaeological survey as a condition of planning consent given its location in a priority archaeological area.

16. There are significant weaknesses in the Heritage Impact Assessment supporting the application. This fails to recognise the Grade II listed war memorial on Lower Green West which is impacted by the proposals. Remarkably, it also fails to record that the Conservation Area Appraisal and Management Plan recognises that the building makes a "*positive contribution*" to the Conservation Area. This is such a basic error as to raise questions over the validity of the whole assessment and to prompt the need for a revised document to be provided.