



**DEVELOPMENT OF 370-374 LONDON ROAD**  
**Planning application 21/P4129**  
**January 2022**

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. We have considered the proposals in the context of:
- the site's prominent location on the edge of Mitcham Cricket Green Conservation Area for which it acts as a gateway
  - the site's proximity to the nationally listed Burn Bullock and its location in its setting
  - development proposals for the adjacent former Kwik Fit site
  - relevant development plan policies, including the emerging Local Plan
  - the refreshed Cricket Green Charter

3. The National Planning Policy Framework states that "*applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*" (paragraph 132). The applicant has made no effort to engage with the local community. This is despite the site allocation in the emerging Local Plan being one which we put forward and our earlier, significant, representations on the 2019 application for 19 flats and 213 sq m of ground floor commercial space. This application should, therefore, not be looked on favourably.

4. We recognise the potential for development of this site and proposed it as a site allocation in the new Merton Local Plan. Our representation is below:

**366-374 London Road**



**Current uses** – Outdoor car wash

**Preferred future use** – Residential (C3) or Office (B1) with ground floor retail (A1/A2 but not hot food takeaway A5)

**Existing planning & other issues** – Archaeological Priority Zone, Wandle Valley buffer, setting of listed building (Grade II Burn Bullock), adjacent to Mitcham Cricket Green Conservation Area

**Future opportunities** – Positive use of empty site with active frontage to London Road strengthening and extending local retail parade. Height to be guided by context of buildings over shops running along London Road to south west

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5. We were pleased that Merton Council agreed with our proposals and the site is allocated for "*mixed used non-residential (shops, services, offices, community) on the ground floor and residential on upper floors*" in the Local Plan submitted for Examination (site Mi7). A capacity for 5-8 new homes is indicated "*sensitive to the heritage assets and historic setting and character*" and "*with active frontage to London Road strengthening and extending local retail parade*". We support this allocation.

#### Land use

6. The plans are for nine homes for sale and no commercial use. This is not consistent with the site allocation.

7. We support the residential use on the site only if it is accompanied by ground floor commercial uses which support the opportunity for strengthening and extending the local parade as envisaged by the site allocation. London Road makes an important contribution to the variety of local parades recognised in the Local Plan and any development should provide for a strong active frontage. This is not provided by a street level elevation comprising three Winter Gardens and bin stores. This will result in a "dead" stretch of London Road.

#### Building height and design

8. We welcome the reduced height and mass of the scheme. It relates more strongly to the existing parade to the south west and is appropriate.

9. The design approach remains every day and ubiquitous. It does not respond to the rich character of the surrounding neighbourhood and will not add positively to the area which is a gateway to Mitcham Cricket Green Conservation Area and includes nationally listed buildings. We welcome the use of recessed balconies and the provision of Winter Gardens given the heavily trafficked nature of London Road. It is unclear whether the Winter Gardens are provided at all levels.

10. The key ground floor elevation to London Road comprises front doors, bin shelters and bike stores with Winter gardens above. It is entirely inappropriate, creating a dead stretch along this key route and introducing clutter and obstructions arising from servicing and deliveries. The building design should ensure these provisions are met other than on the front elevation.

11. We are unconvinced by the concrete white surround proposed for Winter Gardens/balconies which lacks local precedent.

12. Further detail is needed of the brick colour and the boundary treatments to the rear and south west of the site.

13. A Design and Access Statement should be provided before determination of the application. This is a compulsory requirement of Merton's Planning Application Validation Checklist.

#### Trees and greening

14. The plans would require the loss of three of the four trees adjacent to the site. We welcome retention of the Ginkgo on London Road which makes an important and positive contribution to the local environment. We believe further measures are necessary to compensate for the proposed loss of the three other trees.

15. The plans result in an Urban Greening Factor score of 0.12. Policy G5 of the London Plan expected residential development to achieve a score of 0.4 and this is also anticipated in the emerging Local Plan.

16. The plans include proposals for a green roof. This is welcome but 166 sq m of sedum provides only limited benefit and does not meet GRO Code 2014. Given the low

Urban Greening Factor score we believe a green roof with substrate at least 80mm deep that meets GRO Code 2014 is needed. Any green roof will need to be well maintained and this should be required by planning condition, including costs for regular independent inspection.

17. The plans fall well short of policy expectations for urban greening and protection of trees and the tree canopy. They need to be revised before planning permission can be considered.

#### Other issues

18. The site lies within Mitcham's archaeological priority zone. Any development should be conditional on a full archaeological survey on the ground being undertaken before building is commenced.

19. The viability study prepared by the applicants confirms that even based on pessimistic assumptions the scheme returns a profit of £0.5m if 20% of the homes provided are affordable. The scheme's viability turns on its land value and we believe it should be meeting local housing needs through the provision of homes at social rent.

20. The Transport Statement accompanying the application states that nine dwellings will generate just one delivery per day on average (para 4.15). We believe this is a significant underestimate and more effective provision for accommodating delivery and service vehicles is required on site to avoid traffic and pedestrian conflicts at the entrance to Broadway Gardens.

21. The Transport Statement recognises that there will be a "*demand for 5-6 cars owned which would need to park on street*" from residents in the development. Parking is already at capacity in the area and this would require significant consequential changes to parking arrangements in Broadway Gardens which will disadvantage existing residents.

22. The single disabled parking space conflicts with the main entrance for residents on the second and third floors.

23. The Transport Statement's appendices are missing and should be provided before determination of the application.

24. For these reasons we object to this planning application which we believe to be in conflict with development plan policies CS14, DM D1, DM D2 and DM D4. We ask that planning permission is refused and would welcome an opportunity to work with the applicants in developing a more appropriate scheme.