

Mitcham Cricket Green Community and Heritage

CONVERSION OF OLD TENNIS COURTS INTO FLOODLIT MULTI-USE GAMES AREA

Amended application number 13/P1744
November 2013

1. Mitcham Cricket Green Community and Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs and has been closely involved in the development of the Borough Character Studies, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. 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.
2. We have worked with the London Borough of Merton and our local councillors to produce the Cricket Green Charter (<http://bit.ly/1b3VLIS>) which establishes our approach to development and change in the area and has been acknowledged in finalising the Conservation Area Appraisal and Management Plan for Cricket Green.
3. We have provided clear views about these proposals since they were announced without warning at a meeting with the Leisure and Culture Development Manager in August 2011 and we have sought and encouraged dialogue with the Council for over two years. It is extremely disappointing to find the proposals have been submitted without the courtesy of either pre-application consultation or even notifying us of the first planning application.
4. We have considered the revised proposals which reduce the height of the proposed floodlights by 2m to 6m and add a net roof. These changes make no material difference to the grounds of our original objection. Indeed, the evidence against the proposals has grown since submission of the first application.
5. We maintain our objection to this development in the strongest terms:
 - It will cause significant harm to the special quality of Mitcham Cricket Green Conservation Area and harm the setting of two listed mansion houses – Park Place and Canons
 - Seven days a week floodlighting will cause serious light pollution and sky glow at the heart of the area
 - There will be serious harm to wildlife, including impacts on legally protected bats
 - It will cause a significant loss of important trees and habitats – including damage to a copse valued at £126,000 for the community – which is not adequately compensated for by new planting
 - Alternative facilities are available nearby and under-used - Merton Council's own research concludes *"there is significantly better provision in Mitcham and Colliers Wood than other parts of the borough"*

- This development is has been put forward by Merton Council despite being knowingly in conflict with its own planning policies – it has been advertised as a “departure application”
- Claimed support for the development is based on a public survey undertaken in the nearby leisure centre – akin to asking visitors to McDonald’s if they like Big Macs
- There is no commitment to make provision for free use of the facilities by the local community – as was available with the former tennis courts

Context

6. We have considered the proposals in the context of the National Planning Policy Framework, development plan (Core Strategy, UDP and London Plan), Conservation Area Appraisal and Management Plan (adopted on 1 July 2013), the draft Sites and Policies Plan and the emerging Borough Character Studies. We have also considered it against the Cricket Green Charter which states:

2. *All new development should add to and not detract from the local character, and be respectful of setting, context, massing and height*

6. *The variety of open space should be positively managed for quiet enjoyment, recreation, sport and nature*

14. *The sensitive lighting and attractive nightscape should be respected*

18. *Canons House, Park Place and their grounds should be restored, given greater unity and become a thriving centre of cultural and leisure activity which appeals beyond the local area*

7. Mitcham Cricket Green Community and Heritage is keen to see expanded recreational facilities in the area and this is part of our charitable purpose “*to support and expand the recreational facilities for the benefit of local people*”. We have campaigned for several years for restoration of the tennis courts and would welcome further facilities being provided in the grounds of the Canons which have long sporting associations. We are currently exploring these as part of our Heritage Lottery Fund supported Know Your Cricket Green project.

8. It is important that additional recreational and sporting facilities are provided in a manner which both enhances Cricket Green Conservation Area and promotes an inclusive approach to the use of any facilities in line with Merton’s policies on inclusion for sport and health. Any development also needs to respect the development plan policies for a site located in the Wandle Valley Regional Park and formally recognised as Open Space and as a Green Corridor. We believe that the proposals demonstrably fail on all counts.

9. We are concerned by the lack of convincing evidence of the demand for the multi-use sport pitch in this location. Nearby facilities at KNK Stadium are not fully used and there are under-used facilities at Cranmer School and elsewhere. We note that Merton’s *Sports Pitch Strategy* (2011) states that:

“MUGAs are therefore widely distributed throughout the borough and all sub areas are served by at least one such facility, but there is significantly better provision in Mitcham and Colliers Wood than other parts of the borough.”

There is wide provision and Mitcham fares better than most. The report also says there is *“no established methodology for determining levels of demand”*. It also highlights the importance of considering floodlighting only *“where planning considerations allow”* which is clearly not the case in the heart of a conservation area and with an application which knowingly departs from approved planning policies.

Key issues

10. We object to the proposals for a floodlit MUGA on the following grounds:

Floodlighting – it is inconceivable that the extensive floodlighting proposed will not have a highly damaging and urbanising impact at the heart of Mitcham Cricket Green Conservation Area. This is not significantly affected by reducing the height from 8m to 6m. The grounds of the Canons are valued for their sensitive lighting and quality of the night time landscape. This was recognised in the development of the Cricket Green Charter and is enhanced by the Council’s own policy deliberately to provide subdued lighting in the area. This also benefits the important bat population. Experience of similar floodlit MUGA schemes in other locations shows that even the most zealous effort to restrict light spill cannot avoid a major impact on both the surrounding land and the sky above. The lighting impact is not adequately described by the information accompanying the application. It will be visible across a large area for long periods of the day outside the summer. Mitcham Cricket Green’s Conservation Area Appraisal and Management Plan stresses the value of the wide panoramas on its character – the night time landscape would be significantly and adversely affected by floodlighting. This would also damage the setting of the two listed mansion houses located nearby – Canons House and Park Place.

Trees and woodland – the plans involve significant loss of trees in the adjacent wood known locally as Bellamy’s Copse. It is unfortunate that many of these trees were planted by Merton Council itself to screen the rear elevation of the leisure centre and sustain views. It is more than unfortunate that Merton Council has pre-emptively felled and cleared an area of Bellamy’s Copse in advance of this application which is coincident with the location of the MUGA. This provocative action does little to engender trust in the Council’s commitment to the local environment. This woodland was the subject of an economic assessment by Friends of the Canons which showed its community value as £126,000. Further loss will erode the community value of this important area of woodland. Four additional trees are proposed to be removed without any commitment to the species which will be planted in compensation or to their long term after care. The revised planting plans also run the risk of damaging the informal edge to Bellamy’s Copse.

Wildlife – the proposals pose a significant risk to wildlife, notably bats which are a protected species. The area running between the Methodist Church and Bellamy’s Copse is an important green corridor which is strongly protected by development plan policies. This will be compromised by the installation of floodlighting, the “vacuum effect” on local insects and the extension of further hard surfacing.

Fencing and netting – the proposed heavy duty fencing and the additional roof net and side netting will be a major visual intrusion in the Conservation Area – there will be a much more significant sense of enclosure and a loss of views and the open feel of this area of the Canons

Access - we are also concerned to ensure there is significant access to non-paying customers and the local community and would ask that this be addressed as a condition if permission were to be granted. It is disappointing that no such guarantees are provided as part of the application. Such access was a feature of the previous tennis courts.

New information

11. The evidence weighing against this development has grown since the application was first submitted. It has attracted significant opprobrium as people have been shocked to find their own local authority submitting proposals which so clearly conflict with its own planning policies and cause harm to the area.

12. The information accompanying the revised application undermines the applicants own case as it exposes serious contradictions in the evidence provided on the impact of floodlighting.

13. The original Design and Access statement says of the 8m floodlights that:

“If the columns were reduced in height, there would be a need to aim the lights further upwards from the horizontal thus increasing spillage and sky glow.”

para 2.3.1

14. Remarkably, the revised Design and Access statement says exactly of the same of the 6m floodlights:

“If the columns were reduced in height, there would be a need to aim the lights further upwards from the horizontal thus increasing spillage and sky glow.”

para 2.3.1

15. Indeed the two documents bear a remarkable resemblance. The case originally put forward for the 8m floodlights is seemingly able to be dismissed and a cut and paste of the Design and Access statement re-submitted. This undermines the credibility of any of the evidence that accompanies this application.

16. It is also disappointing to see the Design and Access statement misleadingly claim that the neighbouring bowling green is floodlit. There is no comparison between the proposed floodlights and intensity of use of the MUGA and the low key external lights on the bowling club's pavilion. Bowling also takes place infrequently during the summer months and not 7 days a week all year round as is proposed for the MUGA.

Conclusions

17. These impacts mean that far from conserving or enhancing the character of Mitcham Cricket Green Conservation Area the scheme cause very significant harm. It also runs contrary to the area's development plan and the draft Sites and Policies Development Plan Document, including:

CS13 – protect and enhance open space, encourage green corridors and safe species movement & refuse development that impacts on protected species

CS14 – conserve and enhance Merton’s heritage assets through iconic open spaces, conservation areas and nationally and locally listed buildings

DM01 – protect and enhance green corridors as part of Merton’s rich endowment of open space

DM D1 – lighting shall not cause “*light pollution that adversely affects neighbours or biodiversity*” and states that “*inappropriate and unnecessary lighting or lighting which is insensitively used can adversely affect amenity in terms of light pollution to neighbouring occupiers and to the night sky*”.

18. The conservation area and planning policy framework requires these proposals not just to avoid negative impacts but also positively to enhance both the conservation area and the nature conservation value of the site. Even the most generous assessment of the scheme would fail it on these counts alone.

19. In conclusion, therefore, we object strongly to the proposals for a floodlit MUGA which will cause demonstrable harm to the character of Mitcham Cricket Green Conservation Area and be in conflict with the adopted and draft development plan policies. We urge Merton Council to rethink these proposals and return with a scheme that re-uses the former tennis courts (in this the home of the Wimbledon Championships) without floodlighting. This scheme should also provide access for local residents. We should be happy to support and help fundraise for it.

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