



**National
Trust**

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3 January 2019

Future Merton Team
London Borough of Merton
Merton Civic Centre
London Road
Morden
SM4 5DX

Dear Sir/Madam,

Draft Merton Local Plan Stage 2 Consultation – Consultation response by the National Trust

The National Trust is pleased to respond to the consultation on the Draft Merton Local Plan.

The National Trust is the owner of Morden Hall Park which is situated to the east of the Wider Morden Town Centre Area and the Morden Regeneration Zone. Part of the western boundary of the Park forms the eastern boundary of the Town Centre Area and Regeneration Zone along Morden Hall Road. Morden Hall Park is a Registered Park of Historic Interest containing a range of Grade II listed assets, including Morden Hall. The extent of the Trust's land ownership is shown edged green on the attached plan.

Having reviewed the Draft Merton Local Plan the Trust wishes to make representations on Policies N3.3, DP5.1, D5.5 and O8.2 as set out below.

Policy N3.3 Morden

The Trust fully supports the aspiration set out in Policy N3.3 to rejuvenate Morden and create a modern, attractive and vibrant destination that meets the needs of the current and future residents, businesses and visitors and provides economic, social and environmental benefits. The Trust is also supportive of the plan-led approach to increasing the development capacity of the Wider Morden Town Centre Area.

The Trust notes that the Council will adopt a plan-led approach which *'will help to conserve and enhance the character and distinctiveness of the surrounding suburban Morden neighbourhood'*. In the Trust's view, given the proximity of Morden Hall Park to the Town Centre Area and the Morden Regeneration Zone, explicit reference should be made in

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Policy N3.3 to the importance of ensuring that the proposed development is carefully planned and designed so as to safeguard the setting of Morden Hall and Morden Hall Park.

Turning to the Plan's provisions for the Morden Regeneration Zone the Trust is generally satisfied with the Council's approach but is very concerned that paragraph e), which deals with taller buildings, pays no regard to the need in planning taller buildings to safeguard the setting of heritage assets, in particular Morden Hall and Morden Hall Park. This should be rectified in the next draft of the Plan by the inclusion of appropriate wording in paragraph e) in relation to taller buildings and by revising the justification text at paragraphs 2.3.47 to 2.3.50. In addition reference should be made in paragraph e) to the need to safeguard the setting of heritage assets in the planning of the entire development within the Morden Regeneration Zone.

In the wording of the provisions set out in paragraph i) of the section on Wider Morden Town Centre Area and paragraph k) of the section on The Morden Neighbourhood the Trust suggests that there should be explicit reference in the text to the opportunity for, and importance of, enhancing the pedestrian and cycle links between the town centre and Morden Hall Park so as to give ready access to the Park and its facilities for town centre residents and workers. In fact this opportunity is acknowledged in paragraph 2.3.60 of the justification to Policy N3.3 which states that '*Morden Hall Park, to the east of the town centre also provides a variety of leisure, community and cultural facilities. The regeneration provides an opportunity for greater linkages between the transport facilities and the park*'.

In paragraph 2.3.78 of the justification for Policy N3.3 the Council notes that planning obligations (section 106 Agreements) and the Community Infrastructure Levy (CIL) will be used to mitigate the impact of development and to ensure the delivery of key infrastructure. In the Trust's view the next version of the Local Plan should include further details of the matters likely to be covered by section 106 Agreements and CIL payments. The Trust would expect such payments to cover, amongst other things, the delivery of new and improved pedestrian and cycle links between the town centre and Morden Hall Park and a contribution towards the cost of maintaining the Park's facilities to reflect the increased visitor usage when the town centre development is implemented.

In the Strategic Planning Factors section of the site allocation description for Mo4 Morden Regeneration Zone the Trust suggests that more comprehensive reference should be made to the importance of Morden Hall Park – the wording in Mo5 Morden Road Clinic and Morden Hall Medical Centre could usefully be included. It states that '*Morden Hall Park to the east of the site is a registered Historic Park which is within the Wandle Valley conservation area and the Wandle Valley Regional Park. The park is also designated as Metropolitan Open Land, green corridor, green chain and a site of importance for nature conservation*'.

In the Issues sections of the site allocation descriptions for Mo4 Morden Regeneration Zone and Mo5 Morden Road Clinic and Morden Hall Medical Centre the Trust considers that reference should be made to preserving and enhancing the character of Morden Hall Park

rather than 'respecting' and that mention should also be made of the importance of safeguarding the setting of historic assets, notably the listed Morden Hall.

Policy DP5.1

In the section of Strategic Policy LP DP5.1 Placemaking and Design, dealing with tall buildings, the Trust considers that the safeguards included in design criterion (f(v)) relating to heritage assets should be strengthened. This criterion should require the setting of heritage assets to be safeguarded when tall buildings are proposed and the wording of f(v) should be revised to give explicit reference to the safeguarding of heritage assets. As drafted the current wording, which refers to undermining local character and heritage assets, is rather vague and falls short of statutory requirements and the guidance given in the National Planning Policy Framework Policy 16 (NPPF, 2018).

Policy D5.5

The Trust fully supports the comprehensive and robust approach to managing heritage assets set out in Policy D5.5 Managing Heritage Assets.

Policy O8.2

The Trust notes that the figure embedded in Policy O8.2 shows Morden Hall Park to be designated as Metropolitan Open Land (MOL) subject to the restrictive provisions set out in paragraph (a) of this policy. Recognising the important role that Morden Hall Park plays as strategic open space in the borough the Trust acknowledges that the Park should be protected from inappropriate development in line with Policy O8.2. That having been said the Trust considers that Policy O8.2 should be modified to make reference to the particular circumstances pertaining at Morden Hall Park where the south western part of the site is already developed and includes, amongst other things, Morden Hall, visitor facilities, a garden centre, car park, nursery and residential property. Managing this operational estate for the benefit of visitors and to safeguard heritage assets requires that, from time to time, new and upgraded facilities are provided in line with the Trust's estate management plan. In particular it is likely that measures to improve vehicular access and circulation will be required as the Trust plans for growing visitor numbers. This aspiration is supported by Policy O8.1 (b) which seeks the improvement of *'accessibility to all open spaces and areas of nature conservation throughout the borough by public transport, cycling, mobility vehicles and on foot'* and refers in (j) to *'improving opportunities for our residents and visitors to experience nature.'*

In light of the above the Trust proposes that Policy O8.2 should be amended by the inclusion of a paragraph to the effect that the Council will support development proposals at Morden Hall Park which seek to safeguard and enhance its heritage assets and safely manage visitor facilities subject to such proposals not prejudicing the overall openness of the Park.

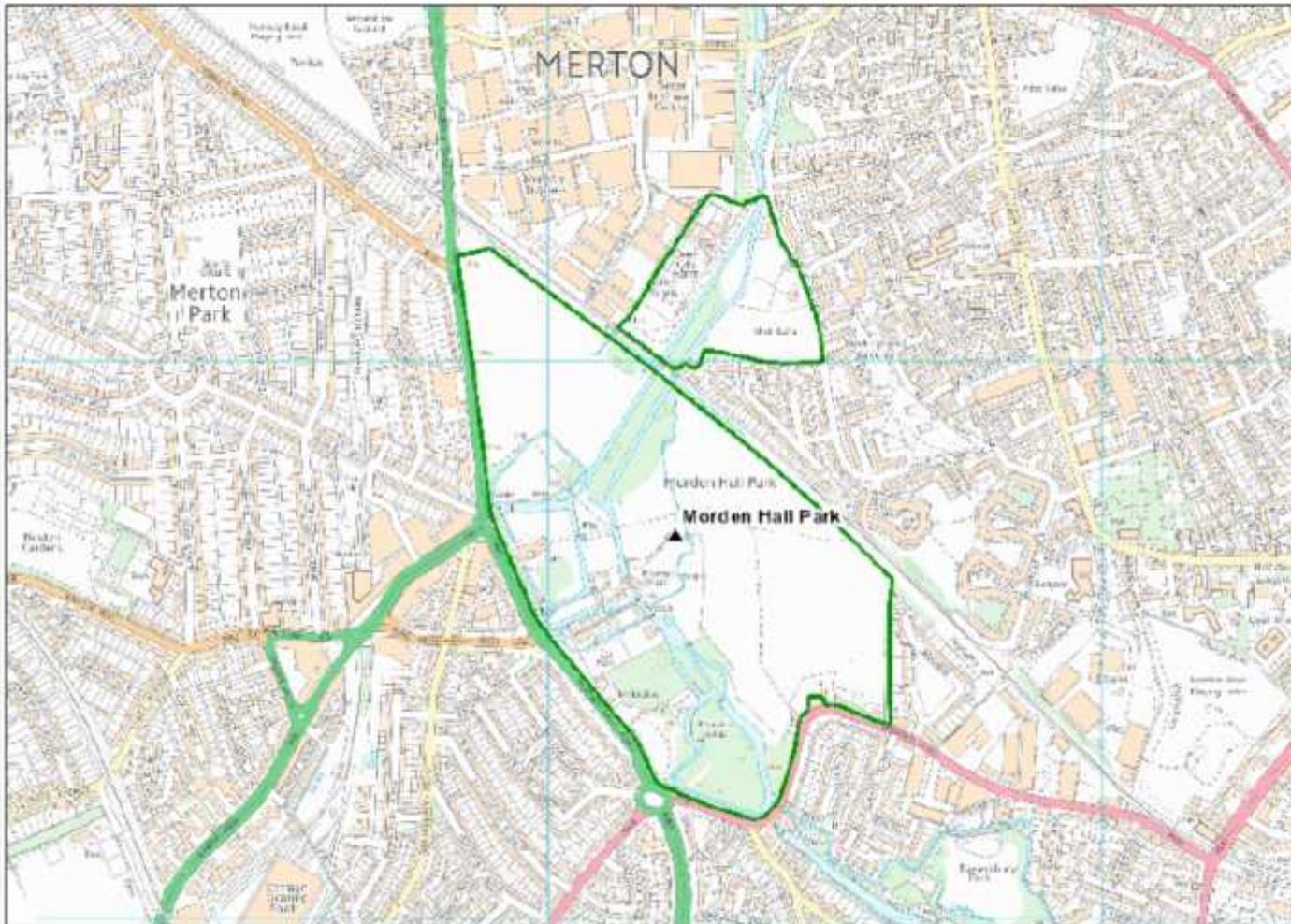
The Trust notes that in paragraph 8.2.3 of the Plan reference is made to the Council updating the 2011 Merton Open Space Strategy. The Trust would welcome the opportunity to have discussions with the Council about this strategy.

Yours faithfully,

Paul White
Planning Adviser



Morden Hall Park



Legend

- Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)

1: 10,000



0.4 0 0.20 0.4 Kilometers

British_National_Grid
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Notes

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