

Merton Local Plan publication stage 3

Planning Responses <planningresponses@londongardenstrust.org>

Tue 31/08/2021 1:16 PM

To: Future Merton <Future.Merton@merton.gov.uk>

Dear Future Merton Team

We have submitted a response via the survey, but got to the end & was surprised. Is this your Reg 19 stage?

Please notify us of the appointment of the Planning Inspector and the adoption of the Local Plan.

We are sorry that we have had to make this response at this late stage.

I have checked through our records and I can confirm that neither The Gardens Trust (a statutory consultee) nor London Historic Parks and Gardens Trust have been consulted on the preparation of the Local Plan.

London Historic Parks and Gardens Trust trades as *The London Gardens Trust* (previously *London Parks and Gardens Trust*).

The London Historic Parks and Gardens Trust is a registered charity, affiliated to the national Gardens Trust (GT) a statutory consultee for planning applications.

We champion all London green space and make observations on planning proposals, both on behalf of the GT for sites on the Historic England Register of Parks and Gardens of Special Historic Interest, and also in relation to other green open spaces, especially those in our Inventory <https://londongardenstrust.org/conservation/inventory/>

We are happy to speak to your team or the Inspector if this would be helpful

Kind regards

pp Helen Monger

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Planning and Conservation Working Group

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For the record this was our entry on the survey

Policy D12.5 Managing heritage assets

f. Proposals affecting a heritage asset or its setting should conserve and enhance the significance of the asset as well as its surroundings and have regard to the following:

Our response

The wording of Policy D12.5 focusses mainly on the built heritage. Merton is clearly aware of its historic parks and gardens (both designated and non designated) as referenced in the local plan justification text and on its website <https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens> .

Unfortunately the impacts of development on valued open spaces have not been addressed in policy and therefore they will be unprotected by the local plan.

Insert

Proposals affecting the layout, design, character, use and function of both designated and non designated historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration.

Clarity of policies for historic parks and gardens

Please continue to respect the heritage value of all “designed landscapes” / “historic parks and gardens” and ensure changes do not exclude undesignated heritage assets of open spaces.

Heritage assets include designated and non designated sites. There are two tiers of historic parks and gardens, those on Historic England's register – “registered parks and gardens” and those of local interest. <https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens> .

Policy O15.2 Open Space and Green Infrastructure

c. Ensure that development proposals within designated open spaces (which have met the conditions set in part b) above, meet all the following criteria:

- i. the proposals are of a high quality design and do not harm the character, appearance or function of the open space and;
- ii. the proposals retain and/or improve public access between existing public areas and open spaces through the creation of new and more direct footpath and cycle path links; and,
- iii. the character and function of leisure walks are preserved or enhanced.

Our response

Policy Omission

The policy omission relates to consideration of impacts of development outside the open space on the design of the open space, the experience of being within the space and on views from within looking out and from outside looking in. Such impacts could be loss of tranquillity, daylight, outlook, air quality, micro-climatic effects, overshadowing and amenity.

Insert

the impact of development on views and the setting of open spaces should be carefully managed to maintain the character and enjoyment of these spaces.