

**From:**  
**To:** [Future Merton](#)  
**Subject:** FW: Merton's draft Local Plan consultation on main modifications until 22 March 2024  
**Date:** 20 March 2024 17:14:46  
**Attachments:** [image699007.png](#)  
[image771245.png](#)  
[image545804.png](#)  
[MTA Response 14 03 24.pdf](#)

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To whom it may concern

Please find attached our response to Merton's draft Local Plan.

Best wishes

**Chief Executive Officer**  
**Croydon Almshouse Charities**



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**From:** Merton Council <mertoncouncil@public.govdelivery.com>  
**Sent:** Friday, February 2, 2024 5:05 PM  
**To:**  
**Subject:** Merton's draft Local Plan consultation on main modifications until 22 March 2024



# Consultation on main modifications to Merton's draft Local Plan

Please tell us your views on the main modifications to Merton's draft Local Plan by Friday 22 March 2024

The Planning Inspectors examining Merton's draft Local Plan have proposed a list of main modifications to the Plan, including those discussed at the public hearing sessions during June and October 2022. Please see the Inspectors covering note on the main modifications ([INSP25](#)), which sets out the scope of this consultation to main modifications only.

The main modifications can be found in [LBM29 Schedule of Main Modifications](#) and, for ease of reference, have been incorporated into the draft Local Plan ([document LBM31](#)).

An updated Sustainability Appraisal, Habitats Regulation Assessment, Equalities Impact Assessment and Health Impact Assessment were also produced to assess the proposed modifications and are published below:

- [LBM29 Schedule of Main Modifications dated January 2024](#)
- [LBM30 Schedule of Additional Modifications dated January 2024](#)
- [LBM31 Merton's Local Plan incorporating proposed modifications dated January 2024](#)
- [LBM32 Sustainability Appraisal of Merton's Local Plan dated January 2024](#)
- [LBM33 Habitats Regulations Assessment of Merton's Local Plan dated January 2024](#)
- [LBM34 Equalities Impact Assessment of Merton's Local Plan dated January 2024](#)
- [LBM35 Health Impact Assessment of Merton's Local Plan dated January 2024](#)
- [LBM36 Schedule of Modifications to the Policies Map dated January 2024](#)
- [LBM37 Delivering Net Zero report dated May 2023](#)
- [LBM38 GLA Energy Assessment Guidance dated June 2022](#)

A [Schedule of Additional Modifications \(LBM30\)](#) for factual updates and other minor matters that do not influence the policy direction of the Local Plan is included above for reference.

All of the above documents can be found in the [examination library](#).

Please respond by email to [future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk) or by post to

Future Merton Local Plan  
London Borough of Merton  
Civic Centre  
London Road

Morden  
SM4 5DX

The Planning Inspectors will consider all responses received to this consultation before issuing their final report on Merton's Local Plan.

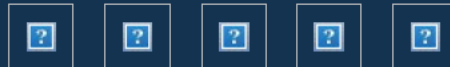
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Project: Mary Tate Cottages

Ref: 713/Doc/14

Date: 14.03.24

## Draft Response to Merton's Draft Local Plan (January 2024)

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ReForm Architects were asked by Croydon Almshouse Charities to draft a response to the Consultation for main modifications to Merton's Draft Local Plan (January 2024).

We reviewed the following relevant consultation documents published by the Local Authority:

- LBM31 Merton's Local Plan (incorporating proposed modifications dated January 2024)
- LBM29 (Schedule of Main Modifications dated January 2024)
- LBM30 (Schedule of Additional Modifications dated January 2024)
- LBM36 (Schedule of Modifications to the Policies Map dated January 2024)

The site behind the Almshouses has been designated Open Space in the new Policies Map (Merton's Local Plan Section 19): *Stage 3 – Green Infrastructure Policies Map 2*. Previously, under Merton's 2014 Merton's Sites and Policies Plan, the site had not been Open Space and had not been designated.

The council's website includes a history of previous consultation documents. The above change was first suggested in a response to the New Local Plan Consultation Stage 2 by Mitcham Cricket Green Community & Heritage, a civic society for Mitcham Cricket Green Conservation Area and its environs. In their January 2019 response, they proposed to 'extend Open Space to include the area currently used as allotments behind Mary Tate's Almshouses'.

The change was introduced to the New Local Plan in Consultation Stage 2a (November 2020 – February 2021) on the basis that the site 'is currently utilized as allotments, offering amenity value through community gardening'. The recommendation for this change was 'subject to a site visit to confirm the current use'. (Source: *Proposed Changes to the Merton Sites and Policies Environmental Maps – Mitcham (Nov 2020)*. We refer to Site 39.)

We would suggest the following response to the New Local Plan modifications:

- The site behind Mary Tate Almshouses is not currently being used as allotments and has not been used as such since 2019. The landowner (Croydon Almshouse Charities) has no intention of returning it to allotments.
- The addition of the site as Open Space was subject to a site visit by the council to confirm its use. CAC has no recollection or record of this taking place so no change in designation should be made without this.
- The site behind the Almshouses is landlocked and offers no public access or visual amenity. The Tate Almshouses Heritage List entry does not mention the allotments or provide a site outline to include the area behind the Almshouses (<https://historicengland.org.uk/listing/the-list/list-entry/1193086?section=official-list-entry>). Since the site is not used as allotments, it does not meet Open Space criteria and should not be designated as such.
- It is of note that other sites that had previously been designated Open Space in the 2014 Local Plan have been removed in the New Local Plan because they no longer meet Open Space criteria. (Source: *Proposed Changes to the Merton Sites and Policies Environmental Maps – Mitcham (Nov 2020)*.)