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Dear Future Merton,

I attach the response from the John Innes Society to the consultation on the draft Small Sites Toolkit.

Thank you for extending the deadline for our submission.

Kind Regards,

Co-Chair John Innes Society.



# THE JOHN INNES SOCIETY

*For Conservation in the John Innes Estate at Merton Park.*

*Charity Number 803759.*

## RESPONSE OF THE JOHN INNES SOCIETY TO MERTON SMALL SITES TOOLKIT SPD.

March 2021.

The John Innes Society was founded fifty years ago and is a Civic Amenity Society registered as Charity Number 803759. The aim of the Society is conservation in the John Innes Estate at Merton. Our Area of Benefit includes the John Innes (Wilton Crescent) Conservation Area, the John Innes (Merton Park) Conservation Area and the Merton Hall Road Conservation Area, which together amount to some 47.24 Hectares plus the residential area to the South as far as Morden, which was developed by the Merton Park Estate Company after the death of John Innes.

We have about 700 members, most of whom live within the Area of Benefit. We have links with the John Innes Horticultural Institute, now at the John Innes Centre at Norwich, which was originally established in Merton Park.

The area is unique in that it is one of London's first garden suburbs, developed on former farmland by John Innes (1829 to 1904). There are a variety of styles and sizes of houses, the earlier ones in the Domestic Revival style, followed by Arts and Crafts designs, all set in tree lined streets, with holly hedges being a unifying feature throughout the estate. One could say that John Innes was the original "Place Maker". As well as the protection afforded by Conservation Area status, there are several Article 4 Directions in force, including one to require planning permission for new crossovers, designed to protect the historic vistas of holly hedges.

The Society has contributed to the Character Appraisals and Management Plans for our Area of Benefit and we review planning applications and make representations whenever we consider the development proposed would be out of character or fail to preserve and enhance the area. We also review relevant Borough policy documents.

We have taken part in public consultations on land use, both locally and nationally.

### **GENERAL COMMENTS.**

1) As with the Merton Character Study, on which this Toolkit is based, new Policies are introduced which have no place in an SPD. Policies should be in the Draft Local Plan, and only come into force once they have survived Public Inquiry. To publish this Toolkit now is prejudging the outcome of the Public Inquiry.

An example of the new policies in the Toolkit – see page 22, 3.6 – last paragraph “A backland plot can be a landlocked site, a plot of land behind buildings **such as a rear garden and private open space ...**”.

**We ask that the words “garden” and “private open space” should be deleted. Both are liable to lead to damage to interests of ecological importance, including tree cover, as well as endangering private sports and recreational grounds.**

2) If Merton is serious about its Climate Emergency Policies, then far greater protection needs to be given to trees as well as those subject to TPO’s or in Conservation Areas. (See page 31, point 5.1.8.) Trees are constantly being felled to make way for minor developments at the moment, such as cabins in gardens. This is a situation which needs to be taken seriously, as Arboricultural Reports, paid for by the developer, often play down the condition or even existence of trees on a site.

3) The London Plan encourages housing to be Street Facing. Landlocked and backland sites fail that criteria unless there is far greater land take to create a new street. To do that will upset the delicate ecological balance by building or covering over land which was formerly permeable and introduce factors such as street lighting, which will damage both wildlife and the amenities of surrounding properties.

4) The Plan of Merton on page 13 (Fig 3.2) has no key, without which it is unintelligible.

5) The List of Site Constraints on page 15 is incomplete.

The list should also include (in no particular order)

Land contamination - add “and geology.”

Site ownership - add “and ownership of access and service line routes.”

Add: Overlooking and/or overshadowing for both surrounding existing buildings and the proposed new ones.

Conservation Areas and Listed Building - add “and the settings of Listed Buildings and Article 4 Directions”.

Add: Neighbourhood Plans.

Add Adequacy of Access for Emergency Services and Refuse Collections.

Add Personal Safety and Security of access.

eg. Pedestrians and cyclists should not have to use secluded access tracks to reach new homes, nor should they have to share limited space on access routes with vehicles.

Add Trees, hedges, shrubs and green cover.

Far greater protection is required than a mere mention of TPO's and Conservation Areas.

Easements and Covenants. Add "and in particular Legal Restrictive Covenants which may prohibit certain kinds of development".

6) On page 34, 5.1.18 , greater emphasis should be placed on retaining gaps between buildings and on corner sites to preserve views of trees and open skies beyond. Otherwise, streets can appear hemmed in and overbearing, especially where the heights of buildings have been increased, either with Planning Permissions or as Permitted Development.

7) The various illustrations of acceptable infill developments are dubious if they are trying to show good infill developments.

e.g. Many would not accept that the three "after" illustrations on page 23, Figs 3. 16, 3.17 and 3.18 are good examples. Their blocky, sterile and industrial style and would be very out of keeping in many settings. They also fill the sites so there is little opportunity for greening and tree replacement, and they ignore the needs of residents for usable outdoor amenity space. The flat roofs will encourage increases in height in years to come.

8) The NPPF requires early development and design liaison to include local communities. There is little evidence in this Toolkit for local community involvement. The Pre-App process and the Design Review Panel are not adequate substitutes. Design (or development at all) in accordance with Local Preferences should not be an optional extra.

Design and Access Statements should include details and the results of thorough prior community consultation.

**John Innes Society March 2021 Contact: email to [mail@johninnessociety.org.uk](mailto:mail@johninnessociety.org.uk)**