



ENGLISH HERITAGE

Ann Clarke
Spatial Planning Policy
Environment and Regeneration
London Borough of Merton

Our ref: HD/P/5019/07
Your ref:
Telephone 020 7973 3771
Fax

BY E-MAIL: Ann.Clarke@merton.gov.uk

27 March 2012

Dear Ms Clarke

London Borough of Merton – Local Development Framework: Draft Sites and Policies Development Plan Document; Proposals Map; Sustainability Appraisal and Borough Character Study

Thank you for the opportunity to comment on the above documents. As the Government's statutory adviser on the historic environment we have reviewed your consultation in light of key national and regional planning policy, including *Planning Policy Statement 5: Planning for the Historic Environment* (PPS 5) and the Draft National Planning Policy Framework (NPPF) (the final version of which was released this afternoon).

General Comments

English Heritage has been interested to see how Merton would build on its strong Core Strategy. We warmly welcome the publication of the Borough Character Study which we consider will provide a most useful evidence base for planning policy and planning decision-making in relation to the borough's historic environment, including its historic character. It is our view that this has helped the Borough go a long way towards fulfilling its duty to "set out in their Local Plan a positive and proactive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats" as required by paragraph 126 of the recently published National Planning Policy Framework (2012).

English Heritage does consider the Sustainability Appraisal to need some strengthening in respect of the historic environment and, as is often the case, this is indicative of some elements that need tightening up in respect of heritage in the DPD itself.

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available



Sustainability Appraisal

English Heritage could not locate the specific wording of the Sustainability Appraisal Objective for the Historic Environment in the Sustainability Appraisal (SA). While it may be the intention to use the same SA Objective as has been used for the Core Strategy, we recommend that it is still set out in this DPD for ease of reference. We found it a bit unusual that the indicators, targets and key issues were present without the objectives being clearly stated and it made it harder to appreciate the relationship between the each of these elements.

English Heritage is content that the indicators and targets are the right ones for the borough's historic environment. We would request that the indicator relating to buildings at risk be expanded to cover Heritage at Risk in the same way that our 'AT Risk' Register has changed as such indicators are usually closely related to the Register.

English Heritage considers the key for the principal matrix that evaluates the policies against the SA Objectives to be inadequate. We request that the range in the key and in the matrix match that used for assessing the site allocations on page 36 which is more comprehensive. We consider this important for the credibility of the assessment as sadly it is very unlikely that the policies can eliminate all uncertainty and potentially negative outcomes for all of the SA Objectives.

English Heritage welcomes the narratives about the assessment of each of the policies as excellent practice. We would, however, question the high number of 'insignificant impact' assessments in relation to the Historic Environment SA Objective. For example, Policy DM R1 concerning the location and scale of development and DM H2 concerning housing mix seem more likely to have an uncertain impact on the historic environment. It is also concerning that DM D1 regarding Design is not assessed as producing a positive impact on the historic environment (although our comments on the DPD itself may assist in improving its assessment in this respect). English Heritage also considers that the transport and environmental improvement policies would also benefit from a closer assessment in relation to the historic environment as sustainable transport and decentralised energy networks are both regarded as beneficial for the historic environment. It is worth noting here that our Historic Environment: Local Management (HELM) website www.helm.org.uk contains a range of guidance about the interaction between the historic environment and a wide range of other topics. We would recommend consulting it if more detailed information would be considered useful.

In respect of the assessments of the site allocations, English Heritage makes the following observations:

- Site 1 would seem more likely to be uncertain for the historic environment given the Core Strategy's position in respect of Tall Buildings in Wimbledon Town Centre;
- We concur that an improved library option for site 16 is likely to be positive for the historic environment;
- We recommend some comment on conservation area status in the SA comments for Site 17 as the absence of a statement about this undermines the assessment suggesting the status has not been considered;

- Although CA status is acknowledged in site description of site 19, English Heritage notes there is no discussion of it in the SA comments, again making it difficult to have confidence in the assessment;
- English Heritage recommends making the comments about the potential impact on the conservation area a bit more explicit in relation to site 20;
- We note that site 22 is described as being in a conservation area in the SA but this is not acknowledged in the DPD itself and we suggest that this is reconciled and some more commentary about impact on this and the setting of the listed building is included in the SA comments section;
- We consider that the site description for Site 24 should include Morden Hall Park's Registered Historic Park status and the presence of important collection of Grade II heritage assets within the park too;
- English Heritage considers that Site 28 would benefit from considering the impact of the listed building status relating to this site in a bit more detail although we would hope that the proposed cultural use should support development that is sympathetic to the heritage asset's significance;
- English Heritage requests more analysis of the significance of Mitcham Fire Station's role in the conservation area and its significance as a locally listed building;
- We request analysis of Site 53's role within the Mitcham Cricket Green Conservation Area; and
- English Heritage requests more analysis in the SA comment about Site 59's role in the Wandle Valley Conservation Area.

Sites and Policies DPD

English Heritage is concerned that Policy DM H2 Housing Mix is too absolute in stating (without any other proviso) that permission for housing development will be granted if it contributes to meeting the needs of different households. It is important to state that it will also need to be otherwise compliant with the Core Strategy and the other policies in this DPD or there is a risk that it will override all other considerations.

Similar Policy DM C1 on community facilities does not appear to allow that other factors might mitigate against the suitability of the proposal and in some instances it may be appropriate that such development occurs in a different location.

English Heritage requests that Policy DM C2 allows more explicitly for the upgrading of historic schools to meet modern standards. Guidance on this matter is available on our HELM website referred to above in our comments on the SA.

English Heritage considers that policies DM E2 regarding offices in town centres, DM D1 concerning design, and DM D2 about alterations and extensions would all benefit from the inclusion of a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised.

English Heritage supports policy DM D3 regarding managing heritage assets, although we are puzzled as to the inclusion of a reference to a World Heritage Site in paragraph d, as the borough does not have one and is not responsible for a buffer zone for such a site either.

English Heritage requests that policy DM F2 concerning sustainable drainage systems be amended to include a reference to the need for such solutions to be appropriate and/or design appropriately for the context in which they are to be located.

English Heritage recommends that policy DM T2 about consideration of transport impacts of development be amended to include specific mention of transport system capacity as consideration that all applicants must cover. Requesting this accords with our joint publication with CABI *Guidance on Tall Buildings* (July, 2007).

In respect of the individual Site Allocations section of this DPD, English Heritage makes the following observations:

- Site proposal 24 next to Morden Hall Park would benefit from including recognition of the range of Grade II listed heritage assets in the park and the fact that it is Register Park of Historic Interest;
- English Heritage notes Site proposal 35 concerns Mitcham Fire Station, which is a locally listed building – we refer you to our joint guidance with the London Fire Brigade about London’s Fire Stations on our HELM website; and
- English Heritage notes that Site proposal 57 concerning Morden Station identifies the tall building reference in the borough’s Core strategy. We recommend that if this is to be included here that such references are included consistently throughout the site allocations. For example Site proposal 28 doesn’t appear to reference the Wimbledon Town Centre approach in the same way.

In respect of the Grouped sites, English Heritage would suggest that the site next to Wimbledon Theatre is especially sensitive, bordering on inappropriate, in relation to tall building development.

English Heritage requests that the Conservation Area status of the grouped sites in Mitcham be recognised in the narrative on pages 102 and 103.

In respect of the grouped sites in Morden, English Heritage requests that the critical nature of site 24, in terms of blending new development with the historic environment, be identified in the narrative on pages 104 and 105 owing to its location right next to Morden Hall Park.

Proposals Map

English Heritage welcomes the inclusion of scheduled monuments, registered parks and gardens and conservation areas on the Proposals Map. We request the addition of listed buildings and archaeological priority areas in order to provide a full picture of the borough’s heritage assets. This will provide the foundation for an appropriately strategic treatment of the historic environment in the Local Development Framework in accordance with the NPPF.

Borough Character Study

As discussed above, English Heritage very much welcomes the Borough Character Study. English Heritage has published a number of guidance documents to promote



1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available

best-practice recording, understanding and management of historic character, entitled *Understanding Place* (2010). These are available at our website www.english-heritage.org.uk, and also on the HELM website. We urge the Borough to ensure that the approach these guidance documents endorse is embedded in the methodology for the characterisation study. This will ensure that the Characterisation Study is comprehensive and robust in regard of historic environment management.

It is also worth noting that English Heritage is working with the Greater London Authority (GLA) on the publication of the Characterisation Supplementary Planning Guidance (SPG) to promote best-practice across the London Boroughs.

In general terms English Heritage supports the methodology adopted for the Characterisation Study. We commend the assessment tables, in particular, which are a useful way to assess good qualities to be preserved, protected and enhanced, and to identify opportunities to address negative qualities within the built environment.

Heritage Assets: An area where the document could be further strengthened in general, however, is in relation to its treatment of heritage assets. Following our Historic Area Assessment guidance, *Understanding Place*, we recommend that heritage assets within each Local Neighbourhood be identified on a plan, and the contribution they make to the local character be articulated in the text. We recommend that all heritage assets in each Neighbourhood be displayed in each Neighbourhood Analysis plan to highlight their contribution to the local character, and to provide clarity where, for example, neighbourhoods of strong character may be, in fact, designated Conservation Areas. In such cases there could be opportunities to cross-refer to and draw from existing Conservation Area Appraisals in the character text which follows.

Identified heritage assets should include listed buildings, conservation areas, scheduled monuments, registered parks and gardens, as well as any locally listed buildings. It may also be useful to identify any heritage assets identified on English Heritage's Heritage at Risk Register (2011).

The document already does, in many cases, describe in the text the contribution made by certain heritage assets to the local character, as for example, in the case of the Streatham Park Chapel and Crematorium. But it is important that this approach is taken to all heritage assets which have townscape value as a visual landmark, or where their historic significance for the neighbourhood is particularly clear.

Tall Buildings: we welcome guidance towards respecting the existing building heights, particularly in neighbourhoods of particularly strong historic character. To reinforce this we urge the Borough to identify the existing building heights in each character area which can provide the context for sensitive infill and character reinforcement opportunities. In addition, it might be useful to provide a cross-reference to the Borough's Tall Buildings Background Paper (2010) in the Study's general introduction, as this provides the strategic context for tall buildings promoted by the Local Development Framework.

In addition, we have the following detailed comments to make:



1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available

- We are pleased to see that a clear rationale is provided for defining the different neighbourhoods on page 4. As the document recognises, these character neighbourhoods are formed of geographical street and landscape groupings which have common built characteristics, sometimes including common origins. Local associations often arise with these areas as a result of this. For clarity, English Heritage suggests that the paragraph be re-ordered to explain that physical characteristics give rise to local associations, ie, that the first sentence of the paragraph be moved to the end of the paragraph. This is particularly important as local associations, as the basis of neighbourhoods on their own, are difficult to provide evidence for.
- English Heritage welcomes the clear criteria which have been used to identify the different character areas on page 5. In addition to those shown, the list could usefully be expanded to include, architectural style, detailing and materials. These are often associated with the age of building or set of buildings, but they can also be used to differentiate between areas which may be of the same architectural period but have different characteristics.
- We suggest that our guidance document *Understanding Place* be included within the background to the methodology for Character Area Assessments as this sets out a robust approach to historic character analysis.
- English Heritage welcomes the scoring system on page 7 in principle. However, we are concerned that the current wording of the categories may be interpreted to imply that areas with a score of 55 or above do not merit enhancement. We would suggest that there may often be opportunities for enhancement, even in areas of the strongest character. The wording of this paragraph, and its repetition throughout the document could be adjusted to reflect this.
- English Heritage is pleased to see a historic background provided for each sub-area in each character area, as this provides a useful context to explain the assessment, issues and guidance which follows.
- As discussed above, we recommend that each Local Neighbourhood section could be expanded to provide more detailed coverage of heritage assets and the contribution they make to historic character and local distinctiveness.

Notwithstanding these recommendations, English Heritage is pleased to see the production of this draft document. We would be interested to know whether any of the guidance contained in the document will be given further weight within the planning system, for example, through adoption as an SPD.

Conclusion

English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the SPD and its SA, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.



Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the Sites and Policies DPD, and which (despite the SA) may have adverse effects on the environment.

We trust this advice is of assistance to your process and would be happy to discuss any element of it should you deem it useful to do so.

Yours sincerely



Claire Craig

Planning Adviser (London)

E-mail: Claire.Craig@english-heritage.org.uk



1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available