



## ENGLISH HERITAGE

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Date: 27<sup>th</sup> February 2013

Dear Sir/Madam

### **London Borough of Merton**

### **Draft Sites and Policies Development Plan Document and draft Policies Map – Stage 3 Public consultation January 2013; and Associated Sustainability Appraisal Report Preferred Options Stage 3 – January 2013**

Thank you for consulting English Heritage on the above documents. As the Government's advisor on the historic environment and a statutory consultee we welcome the opportunity to provide comments on the further iteration of the Sites and Policies Development Plan Document (DPD), Policies Map and Sustainability Appraisals (SA).

As you will be aware the National Planning Policy Framework (2012) sets out a clear statement that local planning authorities should provide a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance (NPPF para 126).

With reference to our previous comments as expressed in our letters dated 27<sup>th</sup> March 2012 and 17<sup>th</sup> August 2012, we have the following points to make on the current draft Sites and Policies DPD and draft Policies Map:

Policy DM H2 – We welcome the changes made to this policy in that it no longer is absolute in its intention. However it would be still useful to acknowledge that other factors could influence the housing mix of a proposal, such as contextual design issues.

Policy DM C1 – It is noted that this policy has not been amended to reflect our previous comments. A way forward could be to include a reference to the historic context of sites in the Justification (e.g. para 3.5). Specific reference could be made for proposals to be developed in accordance with design policies such as DM D3 Managing Heritage Assets.

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Policy DM C2 – Reference could be made in the Justification to the opportunity of upgrading schools in historic buildings in line with English Heritage guidance Refurbishing *Historic School Buildings* (<http://www.helm.org.uk/guidance-library/refurbishing-historic-school-buildings/>).

Policies DM E2, DM D1, and DM D2 – Reflecting our previous comments we would suggest that a reference to the historic context and significance of heritage assets would be useful in these policies, in order to avoid inappropriate developments that could cause harm being supported.

Policy DM D3 – Welcome the removal of the reference to World Heritage Sites.

Policy DM F2 – The policy would benefit from a reference being made to the contextual qualities of a site being considered when developing sustainable drainage systems, waste water and water infrastructure. This includes consideration of any heritage assets and their significance.

Policy DM T2 – Reflecting our previous comments the policy could benefit from a need to for development to take account of existing a potential transport capacity levels. The concern is that transport infrastructure provision could be amended to accommodate development proposals that in turn could have an adverse impact upon the significance of heritage assets. This is through the nature of the development and the changes made to the transport infrastructure e.g. displacement of traffic to sensitive locations, or inappropriate amendments in the road layout that could harm the setting of heritage assets.

With regards to Site Allocations English Heritage have the following comments to make:

Site Proposal 24 – We welcome the reference made to the neighbouring Morden Hall Park a grade II Register Park and Garden and the listed buildings it contains. It is important to ensure that development of this site is respectful of the historic context, a point which should be explicitly stated in the text.

Site Proposal 35 – As a locally listed Fire Station we would suggest that the following English Heritage guidance London's Historic Fire Stations would be useful to reference in the document (<http://www.helm.org.uk/guidance-library/londons-historic-fire-stations/>).

Site Proposals 57 and 28 – We note that Site 28 has been amended to include a reference to the Core Strategy policy concerning tall buildings. We note that in the case of this Site the proximity of the Wimbledon Theatre has been noted as being sensitive. With this thought in mind, the inclusion of this site as being appropriate for a tall building should be justified. Is there any evidence to support the current policy direction? Has any modelling been undertaken for this site to demonstrate the capacity, volume and scale of development, so that it would not cause harm to the significance of the grade II listed Theatre and any other heritage assets? Finally we would seek to ensure all other relevant Sites have been referenced in the same manner, and that there is robust evidence that provides support for the appropriateness of tall buildings at these specific sites.

It is noted that the Policies Map for the whole of the Borough only includes conservation areas (e.g. Map A – 3). There appears to be no Policies Map that highlights the Borough's Archaeological Priority areas, Scheduled monuments, Registered Parks and Gardens and Listed Buildings. Including this information on Policies Map help users of the DPDs understand the historic character of the Borough in terms of its spatial relationship with other policy designations and site proposals.

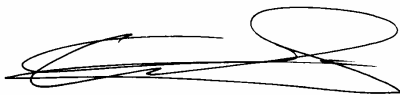
With regards to the SA Report – Preferred Options Stage 3 we have the following comments to make:

It is noted that following on from our letter dated 17<sup>th</sup> August 2012 only policy DM H3 and Site 65 appear to have been reappraised. For example policy DM H3 has been reappraised so that it now has a neutral impact upon the historic environment as compared to positive in the previous SA Report. In the case of Site 65, its appraisal of the historic environment has remained as neutral. This implies that our previous comments have not been considered. It would be useful to get confirmation on how the comments raised have been addressed in the latest iteration of the SA Report.

In reviewing the various documents provided we would strongly support the involvement of the Borough's own conservation staff. They are often best placed to advise on local heritage matters. In the meantime we welcome our continued involvement in the Sites and Policies DPD, Policies Map and SA, and look forward to working with the Council in address any concerns raised prior to the Examination in Public.

Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where English Heritage consider it appropriate to do so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Saunders', with a large, stylized flourish at the end.

**Graham Saunders**  
**Principal Adviser - Historic Environment Planning - LONDON**