By email to: future.merton@merton.gov.uk

Dear Ms Clarke,

Re: London Borough of Merton draft Stage 2 (Regulation 18) Local Plan dated October 2018

Thank you for your notification of the draft Merton Local Plan. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft document. I have provided a summary of our advice below which is followed by more detailed comments in Appendix 1. These comments have been formed in line with the NPPF (2018) and with reference to draft New London Plan (as amended 13th Aug 2018) which will become part of the Borough’s development plan if adopted.

Summary

- The evidence base used to inform the draft plan does not appear to have been published, this will be critical to understanding the approach to tall buildings, housing, site allocations and strategic policies. We highlighted the need for robust evidence in our previous response dated 8th January 2018.

- The draft local plan represents heritage well throughout, however in order to be meaningful and justified they must be based on adequate evidence; not doing so could undermine the policies and mean that the plan is unsound. NPPF Paragraph 188 requires local authorities to make information about the historic environment gathered as part of policy-making publically accessible.

- The site allocation policies generally include appropriate safeguards to ensure that the historic environment is properly considered but are vague in terms of detail. We are particularly pleased to see reference to designated and non-designated heritage assets, setting and Heritage at Risk where relevant, and to see that opportunities for enhancement have been identified. However, without evidence we cannot say whether the appropriate policy criterions have been included. We do have additional comments to make on certain sites with heritage sensitivities where we feel the wording could be strengthened which we hope are helpful.
In addition to our advice in this letter we encourage you to review our Good Practice Advice and Advice Note documents part of your local plan development:

The Historic Environment in Local Plans - Good Practice Advice in Planning 1

The Setting of Heritage Assets - Good Practice Advice in Planning 3

The Historic Environment and Site Allocations in Local Plans - Advice Note 3

Tall buildings – Advice Note 4

Sustainability Appraisal and Strategic Environmental Assessment – Advice Note 8

I hope these comments are of assistance and we would welcome the opportunity to discuss any these issues as the Plan progresses. In the meantime I am happy to comment on revised wording or content of the Plan prior to publication of the next draft.

Regards

Katie Parsons
Historic Environment Planning Advisor
katie.parsons@historicengland.org.uk
Appendix 1: Detailed Response

General Comments

Setting

1.1 Setting is referenced at some stages in the plan but not consistently. Setting itself is not a designated heritage asset but it often forms an integral part of an asset’s significance and therefore is required to be considered appropriately (see NPPF paragraphs 189, 193 and NPPF glossary).

1.2 As with assessing the impact of site allocations on setting, it is important to understand the significance of any heritage asset/s, and their setting/s, that would be affected by the site allocation in order for the policy to reflect these considerations. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. We would expect to see this reflected in the policy wording and supporting text.

Archaeology

1.3 We welcome specific provision for the protection and enhancement of archaeology as well as emphasis that sites of archaeological importance can occur everywhere. We encourage clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record (e.g, Historic Environment Records) for archaeological remains that are not to be retained in situ.

1.4 Where suggested sites are located in areas of known archaeological potential, weight should be given to this as a consideration in site selection and the comparison with alternate locations. We encourage close liaison with the Greater London Archaeological Advice Service (GLASS) and local conservation officers at site allocation stage.
Heritage at Risk

1.5 The new local plan is a key opportunity to consider how heritage at risk can be positively addressed and also for consideration to be given to how the borough’s heritage assets in future can be sustained. We suggest that the need to address heritage at risk is referenced in the strategic policies section of the draft plan. We also recommend the creation and management of a local Heritage at Risk register. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified. The National Heritage at Risk Register can be found and searched here by local authority: www.historicengland.org.uk/advice/heritage-at-risk

Site allocations and site specific policies

1.6 Site specific heritage policies should give guidance on development affecting heritage assets that demonstrate the local area’s special and distinctive character. It will be necessary to undertake heritage appraisals to understand the impacts of development on the historic environment, to determine whether the site is suitable for development, and what policy criterions are required. In some cases where there are particular heritage sensitivities a Heritage Impact Assessment should be carried out to support the allocation. This should be done before the site is allocated and not when individual applications come forward.

1.7 Where any site allocation includes heritage assets or could affect their setting, this should be identified as a consideration of material weight in the consideration of subsequent development proposals in order for subsequent development to be sustainable (NPPF paragraph 8). Some of the policies identify heritage assets within or near to allocated sites, however this is again not done consistently and in some cases heritage assets are present but not identified.

1.8 We have not been able to comment on all of the site allocation policies, we have instead focused our response on key areas where heritage factors can be strengthened.

1.9 In general the site allocation policies are vague and could be improved to include more detail regarding the site capacity and scale of subsequent development. In some instances the policies make specific reference to the heights of nearby existing developments without actually articulating how this is relevant to the potential scale of development on the allocated site itself. The National Planning Policy Guidance states that:
“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).”

Paragraph: 010 Reference ID: 12-010-20140306 Revision date: 06 03 2014

Evidence base

1.10 The draft plan does not seem to be accompanied by a published evidence base and therefore we do not know what appraisals have been carried out or what documents have been used to inform the policies within the plan. To be justified a local plan should be based on proportionate evidence (NPPF paragraph 35). With a local plan we would expect to see a comprehensive and robust evidence base. Sources include:

- National Heritage List for England [www.historicengland.org.uk/the-list/](http://www.historicengland.org.uk/the-list/)
- Heritage Gateway, [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)
- Historic Environment Record
- Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)
- Conservation area appraisals and management plans
- Historic characterisation assessments
- Detailed historic characterisation work assessing impact of specific proposals.
- Heritage Impact Assessments looking into significance and setting
- Visual impact assessments
- London Views Management Framework (LVMF)
- Topic papers
- 3D modeling
- Robust site selection methodologies
- Review of current heritage policies and impact of effectiveness
- Heritage Counts [https://historicengland.org.uk/research/heritage-counts/](https://historicengland.org.uk/research/heritage-counts/)

There are also a number of evidence documents that have been used to inform the draft new London Plan which may also provide a useful starting point for Merton:

- Characterisation of London’s historic environment (LUC) August 2016
- London’s local character and density (Allies and Morrison) August 2016
Strategic policies

2.1 Strategic policies are a very important part of the plan, particularly given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 20 of the NPPF makes it clear that strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape should be included. Therefore we are pleased to see that the need to conserve and enhance the historic environment and local character are prominently included in Strategic Objectives 2, 3, 5 and 6.

Policy N3.1: Colliers Wood

- We welcome the inclusion of part f) in this overarching policy and paragraphs 3.1.1 and 3.1.22 of the reasoned justification. However, neither the policy nor the supporting text reference setting of heritage assets and we request the policy is amended to address this.

- Paragraphs 3.1.20 and 3.1.21 support the development of tall buildings in Colliers Wood going so far as to define pinnacle heights. There is no evidence to support this approach.

Colliers Wood Sites

Site CW5: Priory Retail Park

2.2 The southern section of the site falls just within the Wandle Valley Conservation Area which also extends to the west of the site boundary. To the immediate southwest of the site lies a Tier 1 Archaeological Priority Area, the Scheduled Monument of The Augustinian Priory of St Mary which is incorrectly identified as being listed in the policy. Neither of these designated heritage assets are properly identified within the policy nor does the policy contain any criterions to require development to conserve or enhance the significance of these assets and their settings. The policy should also specifically require development to conserve and ideally enhance the significance of these heritage assets and their settings.

2.3 Despite modern development, the Augustinian Priory of St Mary at Merton survives well. The foundations provide a remarkably complete ground plan for the priory. This Augustinian Priory is of historic importance as one of the most powerful and influential of all the English houses of regular canons during the medieval period. A large amount of the site has not been excavated and retains considerable potential for further investigation. It will contain archaeological information and environmental evidence relating to the construction, use and history of the priory. We note that the
Policy N3.2 Mitcham

- We welcome the inclusion of part i) in this policy and paragraphs 3.2.13 and 3.2.14 of the reasoned justification.

Mitcham Sites

Site Mi12: Sibthorpe Road Car Park

2.4 We are pleased to see that the policy identifies the presence of the Grade I listed Eagle House and the potential presence of significant archaeology on site. Development on this site has the potential to impact upon the setting of Eagle House, especially if overscaled. We therefore recommend that the policy is strengthened to make specific reference to the need for development to be required to conserve the setting of the Grade I building.

Policy N3.3 Morden Sites

- This policy should better recognise the wider social, cultural, economic, and environmental benefits that the conservation of the historic environment can bring in regeneration.

Site Mo4: Morden Regeneration Site
2.5 This site has been identified as a regeneration area by the Council. The eastern edge of the site falls within the Wandle Valley Conservation Area, this is the only designated heritage asset within the site’s boundary.

2.6 Immediately adjacent to the site lies the Grade II Registered Park and Garden (RPAG) of Morden Hall Park, the Grade II listed Morden Hall and a range of associated structures which are Grade II listed in their own right. The RPAG has archaeological potential; finds to date include the Morden Snuff Mills and the sites of two C18 water mills. The site of the RPAG was owned by the Abbey of Westminster until 1553 when the first estate was developed. The Hall and current estate dates from the mid C18 while the park land dates from the late C19. The site has been occupied continuously for several hundred years which increases the potential for further archaeological finds associated with human occupation within and surrounding the RPAG boundary.

2.7 We are pleased to see that the associated policy identifies the presence of designated and non-designated (locally listed Morden Underground Stations) heritage assets along with the archaeological potential of the site. We also welcome the policy criterion requiring development to respect the character and views to and from the Wandle Valley Conservation Area and the RPAG. If this site is brought forward in the regulation 19 version of the plan, we recommend that the policy could be strengthened to better reflect national legislation by requiring development to conserve and where possible enhance the character or appearance of the conservation area and to make specific reference to the need to have regard for to the setting of the designated heritage assets to the east of the site. The policy should also require the submission of a desk based archaeological assessment upon application to ensure that archaeological potential is considered in the decision making process from the outset.

2.8 The immediate area surrounding the RPAG is already built up on all sides and so the setting has been compromised to a degree. Part 5 of the policy states that there are opportunities for taller buildings in the regeneration area provided that they relate well to the surrounding context. Local plans should seek enhancements where possible and should not seek to worsen the existing setting of the RPAG. Tall buildings do have the potential to adversely impact upon the setting and to be visually intrusive upon the RPAG to detriment of its significance and of people’s enjoyment of the heritage asset. It is recommended that a careful site appraisal is undertaken to identify heritage sensitivities and to inform master planning for the site and to ensure that taller buildings are located away from the heritage assets which lie to the east of the site. Ideally this should occur before the site is allocated so that prospective applicants and decision makers know what areas suitable or unsuitable for tall buildings. As a minimum we would expect the policy to outline the need for a master
planning process which contains an assessment of heritage sensitivity to be undertaken as part of any development proposal process.

Policy N3.6: Wimbledon Town Centre

- Given the historic nature of Wimbledon Town Centre and the simultaneous work on the emerging Future Wimbledon Master-plan, we would expect this policy to be strengthened in heritage terms. We request that an additional criterion is added in the town centre section of the policy to require development to conserve and ideally enhance the historic environment, heritage assets and their setting.

- Similarly we recommend that part d) is amended to read “…by supporting incremental development that respects conserves the character and heritage assets within the area, the significance of both designated and non-designated heritage assets, and their setting”.

- It is recommended that part d) is amended to better reflect paragraph 3.6.7 of the reasoned justification which states that Wimbledon is not suitable for high rise towers instead density should be increased in other ways and moderate increases in heights. Part d) refers to taller buildings rather than tall buildings and we feel that what this means should be better articulated in the interests of providing more robust guidance for developers and decision makers. At present there could be a conflict in meaning between the policy and the reasoned justification.

Wimbledon Sites

Site Wi13: All England Lawn Tennis Club

2.9 The policy identifies the presence of Wimbledon Park but only as a Grade II historic park however it is in fact a Grade II* RPAG which places it within the top 30% of all Registered Parks and Gardens and reflects a level of exceptional historic interest that needs to be recognised and used to inform strategic planning decisions. In 2015 Wimbledon Park was placed on the national Heritage at Risk Register due in part to impacts to designed views and impacts of visual clutter. We advise that the policy is updated to remedy this inaccuracy and to highlight it’s at risk status in order to encourage improvements.

2.10 The site is also surrounded by conservations areas, namely: Bathgate Road Conservation to the north; and the Wimbledon North Conservation Area which bounds the site to the east, south and west. The Bathgate Road Conservation Area is also on the national Heritage at Risk Register. Development on this site may have the
potential to affect the setting of these designated heritage assets and so we advise that the policy is amended to include reference to them.

Site Wi8: South Wimbledon Underground Station

2.11 It is not clear from the policy what the expectations for this site are. The policy refers to the opportunity for providing homes in a landmark location for example but provides no details on the expected scale of development.

2.12 Of particular concern is the policy’s encouragement of building on top of the Grade II listed South Wimbledon station. The policy states that Holden’s stations were often designed to be built over and that there are examples in London where this has occurred. It is true that many of Holden’s stations were designed to accommodate additional storeys. However in this case that never happened. The implication is that the policy is encouraging development to respond to the architect’s unexecuted intention. More worryingly the policy goes on to imply that this will compliment Holden’s design. This is an inadvisable approach and provides no justification for such a sweeping policy basis. Development affecting listed buildings needs to be assessed on its own merits it is not therefore appropriate to encourage such a substantial change to the listed building without having regard to the implications on its special interest or the statutory obligations set out in the Town and Country Planning (Listed Buildings and Conservation Area) Act 1990. The policy may encourage the invitation of proposals for development above the station for which listed building consent may not be forthcoming.

Policy LP D5.1: Placemaking and Design

- We welcome the inclusion of part v) which requires development to conserve and where appropriate enhance Merton’s heritage assets. We do request that this is expanded upon to include reference to the setting of heritage assets as well.

- We are pleased to see that part f) and paragraph 5.1.12 address tall buildings and clearly outlines places where they may be appropriate as well as inappropriate. The policy includes a definition of tall buildings which reflects the Mayoral definition outlined in the draft New London Plan which is welcomed.
Policy D5.5: Managing Heritage Assets

3.1 This policy is generally robust and we have only some minor suggestions to wording:

- **Part c.i.** states that proposals that lead to substantial harm to heritage assets will only be granted in exceptional circumstances. In order to reflect the NPPF we request that the wording is amended. Paragraph 194 of the NPPF tells us that substantial harm will only be acceptable in exceptional circumstance in the context of Grade II listed buildings or Grade II Registered Parks and Gardens (RPAGS). While substantial harm to scheduled monuments, Grade I and II* listed buildings, Grade I and II* RPAGs should be wholly exceptional. The wording as drafted in the plan contains a weaker test than the NPPF.

- **Part f.i.** We suggest that this criterion is simplified to state, “The conservation, or reinstatement if lost, of features both internal and external that contribute to the significance of the asset or its setting.” It is understood that the intention of the proceeding sentences is to provide more detail but attempting to list features that may or may not be of importance can often result in confusion as it is simply not possible to list them all in a policy.

- **Part f.ii.** We welcome a criterion which seeks to remedy harmful alterations and additions that may have been made to heritage assets over time. As with part i) above, we do not recommend that the policy attempt to list examples of such works. Non-original windows may not necessarily be harmful for example just because they are not original. Again the removal of paint or pebble dash may have visual improvements but the process of doing this could irreversibly damage the historic fabric below. It may be more helpful if this criterion was simplified to state “The removal of harmful alterations such as inappropriate additions or unsympathetic alterations.”

Policy D5.10: Basements and Subterranean Development

4.1 We welcome a standalone policy on basement development within the draft Plan. These sorts of development can have implications for the historic environment and we are pleased to see that these are articulated and considered within the supporting text and the policy we do however recommend that the policy is strengthened.

4.2 Basements and subterranean works bring the specific risk of disturbing archaeology. There are also problems when considering subterranean developments within the curtilage of or setting of listed buildings as careful consideration will need
to be given to the need to avoid loss of and disturbance to historic fabric, as well as how the basement level will accessed and arranged. Underpinning of a listed building or structure such as listed garden wall for example, will have significant impacts upon the historic footings and foundations similarly linking the basement to the original property will be problematic. From layout terms, the creation of an additional storey below a property can be as equally harmful to internal plan form, layout, hierarchy and character as adding one above a property. Even smaller works such as a lightwell serving a basement in non-designated building in a conservation area can emphasis the existence of an additional storey below ground therefore allowing what historically was a two storey building for example to be read as a three storey building. Alterations such as this can have major implications upon the character of an area.

- The reasoned justification in paragraphs 5.10.13 – 16 contains a number of points which address the above which is welcome however, in our view, they warrant inclusion in the policy itself.

- Part e) of the policy addresses heritage assets but only insofar as archaeological deposits and hierarchy of internal spaces. Part e) does not refer to the need to conserve or enhance the significance of heritage assets and their setting, the need to consider implications on the structural integrity of a listed buildings, implications upon the footings and foundations which may be of historic interest in their own right, or the implications of light wells and secondary means of access upon the setting and significance of listed buildings and conservation areas.

- Part i) addresses the amenity value of planting. Gardens in residential areas are a key aspect their domestic character. Gardens and planting also provide an important visual relief in built up residential areas and contribute positively to the character and appearance of conservation areas. We recommend that this this criterion is expanded upon to make the link between visual amenity and the value this has to the character and appearance of conservation areas as well as the wider historic environment. This will help improve the ability of the plan to deliver a positive strategy for the historic environment by recognising the environmental benefits that the conservation of the historic environment can bring (NPPF paragraph 185).

- Archaeology is mentioned but the policy contains no criterion requiring the need for a desk based assessment to be submitted upon application in areas where there is archaeological potential. In accordance with paragraph 189 of the NPPF.
Monitoring

5.1 We recommend indicators to measure how successful historic environment policies are. These can include analysis of a local list, completion of conservation area assessments and management plans, assessment of key views, changes in skyline both positive and negative, and a reduction in the number of assets that are classified as heritage at risk.

5.2 We strongly encourage you to adopt the same monitoring indicator used in the draft New London Plan (see below). This indicator seeks to monitor trends regarding the state of the historic environment across London by reporting on the impact on heritage of development proposals (positive, neutral, harmful). Incorporating an adapted version of this indicator will allow the Council to have an overview of the impact development upon the historic environment making the Local Plan more effective and ensuring it embodies an active approach to the conservation and enjoyment of the historic environment. We would be happy to discuss this with you in more detail.

Draft New London Plan KPI

**Impact of development on London’s heritage:** Positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average). 13/08/2018

Glossary

6.1 Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include:

- Listed Buildings
- Scheduled Monuments
- Archaeological Priority Areas
- Conservation Areas
- Registered Parks and Gardens
- Heritage at Risk
- Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

6.2 The Plan does not include a definition of Sustainable Development. We request that this included and that all three objectives outlined within the NPPF are referred to, including the need to conserve or enhance the historic environment.
By email to: future.merton@merton.gov.uk

Dear Ms Clarke,

Re: London Borough of Merton draft Stage 2 (Regulation 18) Local Plan Transport Policies dated January 2019

Thank you for your notification of the draft Merton Local Plan Transport Policies. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft document. I have provided a summary of our advice below. These comments have been formed in line with the NPPF (2018) and with reference to draft New London Plan (as amended 13th Aug 2018) which will become part of the Borough’s development plan if adopted.

I hope these comments are of assistance and we would welcome the opportunity to discuss any these issues as the Plan progresses. In the meantime I am happy to comment on revised wording or content of the Plan prior to publication of the next draft.

Regards

Katie Parsons
Historic Environment Planning Advisor
katie.parsons@historicengland.org.uk
Historic England Advice

Transport policies, schemes and projects can have impacts upon the historic environment. We advise that the setting of both designated and non-designated heritage assets and below ground archaeology is considered from the outset.

We are unable to comment on specific transport infrastructure projects at this stage given that these are such large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress.

We do not have a preference for any transport growth option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of Merton’s heritage assets.

Streetscape plans, new roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on townscape (both positively and negatively) as such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail.

We would refer you to our website and pages concerning Transport and the Historic Environment https://historicengland.org.uk/advice/planning/infrastructure/planning-and-transport/. These pages set out the principles that Historic England will follow when discussing national transport policy and major transport development.

Strategic Policy T6.4

We recommend an amendment to the opening of this policy to read:

“To make Merton a healthier, more connected and inclusive place where everyone is able to travel around in safety within a high quality built, natural and historic environment.”

Sutton Link

We note that the Sutton link scheme is referenced within the local plan Transport policies. We recently provided comments on this project to TfL and we have attached these again here (see Appendix 1 below) given the relevance to Merton’s emerging local plan. TfL consultation available here: https://consultations.tfl.gov.uk/trams/sutton-link/
Appendix 1: Comments to TfL dated 04/01/2019

Transport for London Sutton Link route option proposals consultation October 2018 - January 2019

Historic England Advice

We note from the consultation website that this is an initial consultation only and that further studies and assessments are to be undertaken before a final decision is taken. It is important to ensure that route option appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail; this should include an assessment upon townscape, historic/designed landscapes, heritage assets and their setting. We will be happy to comment on any methodologies or appraisals as they are developed.

All the route options being considered will have implications on road layouts and associated infrastructure, and would result in the introduction of additional signage and hard standings. This will result in impacts on townscape and the historic environment; as such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area.

Opportunities for enhancements to the historic environment, public realm and townscape should be identified. For example the proposed scheme could include strategies to reduce and consolidate associated transport features such as signage, way finding boards etc. The proposals could also include measure to remove redundant signage.

The options being considered are:

Route Option 1 - South Wimbledon to Sutton town centre Suitable for: Tram or Bus Rapid Transit (BRT)

Route Option 2 - Colliers Wood to Sutton town centre Suitable for: Tram or Bus Rapid Transit (BRT)

Route Option 3 - Wimbledon to Sutton town centre Suitable for: Tram only

Designated Heritage Assets:

The three route options have the potential to affect a number of designated heritage assets.
Route Options 1 and 2 may impact upon a number of highly graded assets including:

- Morden Hall Grade II listed Registered Park and Garden (RPAG)
- Augustinian Priory of St Mary at Merton Scheduled Monument
- Sutton High Street Milestone Scheduled Monuments
- Grade II* listed Church of St Nicholas (associated grade II listed structures such as headstones, tombs and mausoleums within the churchyard). This has been recently upgraded from Grade II to II*.
- Grade II* Sutton Baptist Church. This has been recently upgraded from Grade II to II*.

As well as upon:

- A large number of Grade II listed Buildings: Morden Hall and associated structures; Snuff Mills; Wandle Villa; street lamps outside numbers 12 and 34 Station Road; South Wimbledon Station; Hill House; Mecca Bingo Club; 26 and 28 High Street; Sutton War Memorial; recently listed “Cock” landmark sign; Trinity United Reformed Methodist Church and Hall; Sutton Police Station
- Wandle Valley Conservation Area
- Sutton Garden Suburb Conservation Area
- Sutton Town Centre High Street Crossroads Conservation Area

Route Option 3 may impact upon a number of highly graded assets including:

- Grade II* listed Church of St Nicholas (associated grade II listed structures such as headstones, tombs and mausoleums within the churchyard). This has been recently upgraded from Grade II to II*.
- Grade II* Sutton Baptist Church

As well as upon:

- Upper Morden Conservation Area
- Sutton Garden Suburb Conservation Area
- A number of Grade II listed Buildings: recently listed “Cock” landmark sign; 26 and 28 High Street; Sutton War Memorial; Trinity United Reformed Methodist Church and Hall; Sutton Police Station

Heritage at Risk:
Some the designated heritage assets in the vicinity of the proposed route options have been placed on the national Heritage at Risk Register (HAR), these are:

- **Merton**: Grade II listed Garden Walls Merton Park; Augustinian Priory of St Mary at Merton (Merton Priory) Scheduled Monument; Upper Morden Conservation Area.
- **Sutton**: Sutton Town Centre High Street Crossroads Conservation Area

When undertaking any further appraisals and assessment we recommend that the HAR status of these assets is taken into consideration to ensure that their condition and setting is not worsened by link proposals.

**Non-designated Heritage Assets:**

Non-designated heritage assets can cover a range of features. Local Lists should be consulted as part of the appraisal process. The routes will be located in areas where Schedule Monuments are present and in within Archaeological Priority Areas (APAs). This indicates that there is the potential for further archaeology to be present which will necessarily be non-designated. Non-designated heritage assets of archaeological interest and which are of demonstrably equivalent significance to scheduled monuments should be considered subject to the same policies and treatment for designated assets.

**Setting:**

New transport projects and infrastructure raise issues relating to environmental conditions as a result of congestion and air pollutants. The implications for traffic routes as a result of the link project should be considered to avoid avoiding increased emissions elsewhere in the Boroughs. Environmental and atmospheric conditions can be a considerable factor when experiencing the historic environment and individual heritage assets. The wider context within which the historic environment is experienced is an important aspect of its setting and therefore its significance. Setting goes beyond visual links to include atmospheric factors such as lighting, noise, dust, vibration and pollution which can detract from the accessibility to and enjoyment of the historic environment. Equally, the increase in environmental aggressors deriving from emissions that could accelerate the erosion and decline of historic fabric are also an issue. We would encourage you to ensure that these issues are considered within the context of the historic environment as part of the options process.

**Sutton Heritage Action Zone (HAZ):**

The Sutton HAZ partnership will see Historic England, London Borough of Sutton, Successful Sutton Business Improvement District and Carshalton and District History and Archaeological
Society work together over three years (2017-2020) to deliver a series of projects that will support local heritage to promote economic growth in Sutton Town Centre.

Sutton Town Centre is in an area with high levels of deprivation, where the built environment is suffering due to changes in retail within the borough and competition from neighbouring centres. These factors are leading to a deterioration of Sutton’s distinctive local character, parts of which are designated as a conservation area, which contains nationally and locally significant historic buildings. The town centre is also experiencing an unprecedented level of growth that threatens the special local character and other heritage assets. As a consequence of these threats, the High Street Crossroads Conservation Area is on Historic England’s ‘Heritage at Risk’ Register.

The proposed link should seek to compliment the objectives of the HAZ. Further information on the Sutton HAZ and research finding to date can be found on our webpage: https://historicengland.org.uk/services-skills/heritage-action-zones/sutton/.

Preferences:

We do not have a preference for any route option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of Sutton’s and Merton’s heritage assets. All proposed route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

Route Option 3 would stand within an area with relatively few designated heritage assets, although those that are present have been recently upgraded. Options 1 and 2 would have the potential to affect a greater number of assets including those of a higher designation. Further work, specifically with regards to archaeological potential on undiscovered or unknown remains will be crucial for us in determining a preferred option.

Further assessment work on heritage and EIA:

In line with the advice in the National Planning Policy Framework (NPPF), we would expect further appraisal work to contain a thorough assessment of the likely effects the proposed routes might have upon those elements which contribute to the significance of these assets. Assessments should also consider the Sutton Heritage Action Zone.

It is likely that the link will require an EIA and we therefore request that the Environmental Statement includes a robust chapter on Cultural Heritage. The EIA should consider the impact upon both designated and non-designated heritage assets. We advise that all supporting technical information (desk-based assessments, evaluation and post-excavation reports etc.)
are included as appendices to the Environmental Statement. Where relevant, the cultural heritage should be cross-referenced to other chapters or technical appendices; for example noise, light, traffic and landscape.

Further assessment work and any EIA Environmental Statement should be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. The Planning Practice Guidance contains guidance on setting, amplified by the Historic England document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, which provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices. Whilst standardised EIA matrices are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the heritage appraisals for the route options. The assessments should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Design interventions should incorporate mitigation measures as appropriate. Mitigation measures may include appropriate landscaping and screening, as well as low noise road surfacing and managing lighting levels.