



Historic England

Future Merton Team
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Our ref:
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By Email: future.merton@merton.gov.uk

8th January 2018

Dear Sir/Madam,

Regulation 18 consultation: Merton Local Plan issues and options, Call for Sites and Merton's Neighbourhood Community Infrastructure Levy (CIL)

Thank you for consulting Historic England on the issues for the Merton Local Plan and the call for sites. As the Government's Adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the local plan process.

The National Planning Policy Framework (NPPF) identifies the historic environment as a relevant matter contributing to sustainable development (para 7) and includes it within the set of core planning principles (para 17). National policy is clear that local plans should contain a 'positive strategy for the conservation and enjoyment of the historic environment' (paras 126 and 157), while it also recognises the value that the historic environment can bring in inspiring high quality design in new development (paras 58 to 61). The following comments are made in the context of the principles contained in the NPPF and the accompanying Planning Practice Guide (PPG).

At the beginning of plan preparation it is important that a good evidence base is available for the historic environment, so that the significance of the resource is understood and can be positively managed. Merton Council has a strong body of information in the form of the



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Borough Character Study, which provides a strategic picture and understanding of the whole borough. Your individual character appraisals for conservation areas will assist in ensuring policy is developed and sites are allocated so as to conserve and where possible, enhance, these areas. It will be helpful to consider if there are any gaps or updates needed to these documents. Historic England's Advice Note '*Conservation Area Designation, Appraisal and Management*'¹ is available on our website. We also note the Merton Heritage Strategy, and commend you for this initiative which should provide a useful link between planning policy and positive community engagement with the historic environment.

Merton is in a good position regarding the borough's archaeological record, with the Archaeological Priority Areas (APAs) having been recently updated.² This information should ensure that full account is taken of both designated and undesignated archaeology within the borough when assessing suitable development sites for the local plan. If you have any queries about this, please contact Mark Stevenson in the Greater London Archaeological Advisory Service on Mark.stevenson@HistoricEngland.org.uk

The new draft London Plan provides for a clear acceleration in housing development to deal with the existing shortfall in housing and expected future growth. In Merton the growth associated with Crossrail2 should be carefully considered so that adverse impacts on heritage assets and local character are minimised, and any opportunities for enhancement are identified early, so that they can be included in policy where appropriate. At the other end of the spectrum, the new emphasis on bringing small housing sites forward underlines the need to make sure conservation area appraisals are up to date and, where sites detract from their character and appearance, these are assessed for potential enhancement.

The NPPF requirement for local plans to set out a positive strategy for the conservation and enjoyment of the historic environment includes particular mention of heritage assets at risk. There are currently 24 heritage assets in Merton on the London Heritage at Risk Register2017 comprising 16 listed buildings (grade II), one scheduled monument (Merton Priory), six conservation areas and one Registered Park and Garden (Wimbledon Park, grade II*). The local plan review is a key opportunity to consider how these assets can be positively addressed and also for consideration to be given to how the borough's heritage assets in future can be sustained. We note the identification of Merton Priory in the consultation and support the promotion of its conservation.

¹ HE Advice Note: '*Conservation Area Designation, Appraisal and Management*' is available at: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

² London Borough of Merton Archaeological Priority Areas Appraisal, April 2016
<https://content.historicengland.org.uk/content/docs/planning/apa-merton.pdf>



Call for Sites

Although we have no sites to put forward, we note that the Council will need to have regard to potential impacts on the historic environment when considering potential sites. The National Planning Policy Framework explains that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.

As referred to above, Historic England expects policies and proposals of local plans, including development site allocations, to be based on an adequate, up-to-date and relevant evidence base regarding the historic environment. We will look to see how the consideration of impacts on the historic environment has informed the choice of allocation sites. Historic England has published advice on site allocations in local plans (<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>). Also potentially relevant is our advice on the setting of heritage assets (<https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>).

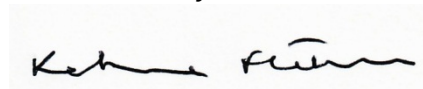
We would be pleased to offer comments on potential sites regarding the potential impact on the significance of designated heritage assets, in confidence if necessary, and advice should be sought from your conservation staff. With the current requirement for the preparation of Brownfield Registers we look forward to consultation at the relevant stages on the sites proposed to be included.

Merton's Neighbourhood Community Infrastructure Levy (CIL)

Historic England notes that CIL can be directed to fund projects such as public realm improvements in historic areas, interpretation panels, and conservation projects of various kinds that can engage local communities. The Borough Heritage Strategy would appear to provide a good basis also for ideas that have aroused public enthusiasm.

I hope these comments are helpful

Yours faithfully



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