



ENGLISH HERITAGE

Future Merton
London Borough of Merton

Our ref:
Your ref:

BY E-MAIL: ldf@merton.gov.uk

Telephone 020 7973 3771
Fax

19 July 2013

Dear Sir/Madam

London Borough of Merton – Rainbow Industrial Estate Planning Brief Supplementary Planning Document

Thank you for the opportunity to comment on the Rainbow Industrial Estate Planning Brief Supplementary Planning Document (SP) for the London Borough of Merton. As the Government's statutory adviser on the historic environment we are keen to ensure that the conservation and enhancement of the historic environment is fully taken into account in the development of the borough's planning policy. Accordingly, we have reviewed your consultation in light of the *National Planning Policy Framework* (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Having done this, English Heritage would firstly like to apologise for the lack of a response to your request for a screening opinion about the need for Strategic Environmental Assessment of the SPD. We would be very grateful if you could advise us (using the e-mail address in the signature of this letter) as to your method of notification so that we may ensure that there are no problems with our internal procedures that could lead to a repeat of this oversight.

English Heritage welcomes and supports the Borough's inclusion of a character assessment as part of the development of this SPD. We were, however, a little disappointed at the apparent lack of consideration of conservation areas in the vicinity of the Rainbow Industrial Estate. We have satisfied ourselves that the Lambton Road Conservation Area is sufficiently screened and removed from the proposed development that the heights proposed for new buildings in the development area should not overwhelm it or reduce the quality of the views from the conservation area. We would, however, like to have seen evidence that the Borough had considered and discounted the same possibility. Consequently, we would also be grateful if you could advise briefly as to whether there are any other conservation areas in the vicinity of the development that warrant, or indeed have had, this sort of consideration. We acknowledge that areas of residential quality have been discussed

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



in the both the SPD and the design report but neither of those indicate that some of these areas have heritage values.

In addition, the Greater London Archaeological Advisory Service (GLAAS) advise that a development site of the size proposed in the SPD is one that they request archaeological fieldwork for as standard. Consequently, English Heritage recommends that the SPD identify the need for this type of work to be undertaken in the development of the site. According to the Greater London Historic Environment Record (GLHER), there are two archaeological sites of significance just to the south of the Rainbow Industrial Estate. The first is West Barnes Farm, which was originally a grange of Merton Priory. Archaeological work in this area suggests that it is potentially a Medieval, moated, manor site. The second site has produced Bronze Age features and finds indicating occupation during this period. Consequently, given the light industrial nature of the existing site, it could still contain significant archaeology. Accordingly, GLAAS request that the SPD indicate the need for developers in this location to undertake a desk based assessment of the potential impact of the existing industrial units on the buried archaeological resource.

In the event that there are no other conservation areas near the proposed location for development, and accepting that there are no significant effects on the Lambton Road Conservation Area, English Heritage can accept the Borough's SEA Screening Statement. We would strongly recommend, however, recognition of conservation areas, archaeological priority areas, and GLAAS archaeological advice (above) in the analysis of the SPD against the Borough's Sustainability Objectives for heritage.

For future reference, English Heritage would strongly advise that the local authority's conservation staff be involved throughout the preparation and implementation of this type of planning policy document 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 SPD, and which may have adverse effects on the environment.

Yours sincerely



Claire Craig

Historic Environment 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