



## ENGLISH HERITAGE

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London Borough of Merton

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22 August 2013

Dear Sir/Madam

### **London Borough of Merton – Draft Sites and Policies Plan Document and Policies Map – Pre-submission publication (consultation July – August 2013).**

Thank you for the opportunity to comment on the Pre-submission Draft Sites and Policies and Draft Policies Map 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.

We are pleased to note that the many of our suggested revisions (please see Claire Craig's letter of 17 August 2012) have been incorporated into the revised document. Where appropriate I have referred to our previous comments and set out any observations arising. In light of the emerging approach by other councils, I have also set out our recommendations which we consider could be beneficially incorporated into the document.

### **Policies**

Policy DM H2 Housing, we previously raised concern in respect of the policy statement that *permission for housing would be granted if it contributes to the needs of different households*. We are pleased to note this has been changed to *Residential development will be considered favourably where they contributes to meeting the needs of different households etc..*

We raised concern in respect that Policy DM C1 Community facilities, did not appear to allow that other factors might mitigate against the suitability of the proposal and it may be appropriate that such development occurs in a different location. This remains the case and we would recommend that paragraph 3.5 (page 64) include a

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sentence to the effect that *the Design and siting of all community facilities affecting designated heritage assets will be in accordance with the heritage policies within the document.*

Policy DMC2 Education, we are please to note the inclusion of paragraph 3.23 in respect of historic school buildings.

We recommended that Polices DM E2, D1 and D2 would benefit from a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. Such a policy is included in policy D2 in respect of basements (DM D2 (b)) but not in Policy DM D2 (a) in respect of design considerations for all developments.

The justification paragraphs for DM D1 (Urban design and Public realm), DM D2 (Design considerations in all developments), and DM D3 (Alterations and Extensions) make reference to Core Strategy Policy CS14 setting out the need for development to respect, reinforce and enhance local character. English Heritage considers this would benefit from additional reference to Core Strategy Policy CS14 also setting out the requirements for the consideration of tall buildings and the impact of proposals on heritage assets. This is pertinent to a number of sites proposals and would help signpost this in respect of relevant issues.

We are pleased to note that reference to the need for drainage solutions to be appropriate and/or designed appropriately for their context has been included.

## **Site Proposals**

A core principle of the National Planning Framework is a plan-led framework which provides a practical framework within which planning applications can be made with a high degree of predictability and efficiency. As such site allocations represent a major opportunity to provide greater certainty for sites through the setting of clear parameters for design and local context. We would strongly suggest that the guidance accompanying each allocation should provide sufficient clarity for landowners and potential developers, highlighting key issues and potential requirements and opportunities to be considered at the planning application stage.

Having reviewed the draft submission in light of other councils' approach, such as Camden and Waltham Forest, we consider that there would be considerable benefit in including a paragraph for each site allocation that sets out clearly the design, context, and development opportunities. In line with the NPPF, the Site Allocations DPD provides the opportunity to interpret the Council's Local Plan policies within the context of the issues identified, resulting in a clear set of development parameters that are site specific. For example, Morden, Proposal 24 outlines the need to respect character and views to and from Morden Hall Park but does not clarify the potential scale of development or clarify the local character that needs to be respected in this context. Such an approach would help provide greater certainty for potential



development, identify opportunities for the enhancement of local character, and deliver sustainable proposals. Such an approach could also address our previous comments in respect of the need to recognise and respond to the Conservation Area status of grouped sites in Mitcham and the sensitivity of the site next to Wimbledon Theatre.

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 Draft Sites and Policies Plan.

Yours sincerely

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