



Historic England

Future Merton Team
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Date 6 September 2021

[By email only to Future.Merton@merton.gov.uk](mailto:Future.Merton@merton.gov.uk)

Dear Sir or Madam

Merton Submission Local Plan Regulation 19 Consultation and Strategic Environmental Assessment Consultation

Thank you for your email of 29 July 2021 inviting comments on the above consultation documents.

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 of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the Regulation 19 Submission Local Plan consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 4 February 2021), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraph 28); and contain policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 185).

Our comments on the Regulation 19 pre-submission stage draft Local Plan (i.e. stage 2a consultation) largely have not been addressed in the current Publication version and our representations, therefore, must be reiterated, and I attach our earlier letter as a formal statement of our position at this stage. Most of the comments are matters of detail and were provided in an advisory capacity to guide the plan towards being a more 'heritage sensitive' framework.



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We welcome, nonetheless, the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.

Our comments on the Sustainability Environmental Assessment remain as set out in our letter of 4 February 2021.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne

Historic Environment Planning Adviser



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