

Future Merton Team London Borough of Merton 12<sup>th</sup> Floor Civic Centre London Road Morden, SM4 5DX

By email: estatesplan@merton.gov.uk

Our ref: HD/ 5025/11 2404

16<sup>th</sup> March 2016

Dear Sir/Madam,

## Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Morden) Draft Estates Local Plan, Stage 2 Consultation

Thank you for the opportunity to provide comments on the Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Morden) Draft Estates Local Plan, Stage 2 consultation. Historic England is the Government's advisor on all matters relating to the historic environment and a statutory consultee on a broad range of applications affecting the historic environment including the Environmental Impact Assessment (EIA) of projects.

Accordingly, we have reviewed these consultations in the context of the National Planning Policy Framework (NPPF) and its core principle 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 documents consider the historic context of the estates, and set out design principles that relate specifically to local context (para 2.47). The townscape policies pick up on the contextual analysis, and we particularly welcome the reference in EP H1 e) to celebrating the historic links with the Admiral Lord Nelson, and EP R1 e) considering the associations with industrial watermills and the Ravensbury Manor estate. This should help ensure that these documents will achieve good design and sustainable development, as set out in paragraphs 58 and 126 of the NPPF.

We would encourage the Council to consider the following suggestions to strengthen the documents further.

Of the three documents Ravensbury and High Path have the most interesting and sensitive historic environments, with listed buildings, registered landscapes and rich archaeological potential. Historic England is pleased to note that listed buildings and archaeological priority areas have been indicated on the maps in the documents. We would encourage you, in the







interests of completeness, to illustrate all designated heritage assets on maps. These include listed street furniture and the listed priory wall near the High Path Estate, conservation areas such as the Wandle Valley Conservation Area near Ravensbury Estate, and registered parks and gardens such as Morden Hall Park which is Grade II registered on the National register of Parks and Gardens of Special Historic Interest. It would help if the registered parks, conservation areas and archaeological priority areas were hatched or shaded on maps rather than outlined to show what is included within areas.

The Ravensbury and High Path documents helpfully reference archaeology, given their locations within APAs. We note the reference in the High Path document to Merton Priory (The Augustinian Priory of St Mary at Merton), and would suggest that you state that it is a Scheduled Ancient Monument (equivalent to a Grade I listing). Further advice on archaeological matters is available from GLAAS as the borough's archaeological advisers, contact Gillian King.

The documents also set out Design Code Requirements. Unfortunately these are generic and do not link back to the previous analysis of local context. There is an opportunity here for the Council to provide detailed guidance about how it would like to see the area developed, and the buildings designed. We would therefore encourage you to take advantage of this opportunity, and spell out more clearly, possibly with illustrative examples, what your vision for these estates will look like.

Finally, it must be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Yours sincerely,



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