



Historic England

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Dear Ms Butcher,

Consultation on the Merton Estates Local Plan – Proposed modifications

Thank you for consulting Historic England on the proposed modifications to the Merton Estates Local Plan. As the Government's adviser on the historic environment and a statutory consultee on Local Plans we welcome the opportunity to comment.

These comments are made in the context of the National Policy Planning Framework (NPPF) which identifies the historic environment among the dimensions contributing sustainable development (para 7). Local plans should set out a positive strategy for the historic environment taking account of the desirability of new development making a positive contribution to local character and distinctiveness (para 126).

Historic England's response to the Estates Local Plan dated 16 March 2016 welcomed various references to historic context in the plan and highlighted areas where the analysis should be linked to policy, including in the Design Code requirements for the estates. In our view, the modifications do not yet resolve this weakness.

There are a number of significant modifications being proposed at this stage, and we highlight areas in this response where, in our view, the heritage interest of the estates and their surrounding areas should be integrated to achieve consistency with national policy. This applies particularly to the new, overarching policies and visions. These comments are set out following the order and references of the proposed Main Modifications schedule.



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MM2, Policy OEP1 Vision

Part C Ravensbury – we recommend ‘...which protects and enhances local heritage, landscape quality and biodiversity.’

Justification

At the end of the paragraph beginning ‘*The diagrams on pages 33, 35 and 37 are composites of*’ amend to read ‘*..The images and diagrams referred to above constitute part of the justification for policy OEP 1 together with the historic analysis and maps in Appendix 3.*’

MM3, Policy OEP2 Strategy

The suite of evidence in the bullet points would benefit from identifying the other relevant parts of the evidence base relating to character and historic analysis. The Archaeological Priority Zones identified in the Appendix 3 maps, which are relevant to both the High Path and Ravensbury Estates, could be referred to here to ensure this aspect is encompassed in the body of the plan. This would ensure clarity in terms of the NPPF, para 154.

MM4 Policy OEP3 Urban Design

In order to integrate heritage interest into the design process, in accordance with paras 58-61 of the NPPF we suggest the following:

OEP3, part (xiii) ‘*Local context and heritage (building scale and massing, local heritage, materials, interpretation, art) Using local good quality design to inform design and appearance, and responding to context and heritage interest.*’

Justification

‘This policy outlines a set of broad design principles. Applications must demonstrate adherence to these principles in order to be in accordance with, in particular, paras 57 to 66, of the NPPF, policies 7.2 and 7.8 of the London Plan, and policies DM D1 and DM D4 of the Merton Sites and Policies Plan.’

In the further explanation of local context we welcome the reference to the historic context. We suggest the following addition to add clarity:

‘Local context and heritage (building scale and massing, local heritage, materials, interpretation, art)

The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local, built and historic context. Development proposals should include an analysis of what local characteristics are relevant and why, and which are less relevant. Opportunity must be taken to strengthen local character by drawing on its positive characteristics, in terms of townscape, scale and layout, the historic significance identified in Appendix 3, and an understanding of any archaeological interest.’



MM13, Policy EP H1 Townscape

Former para 3.130 – we recommend the following changes to integrate heritage considerations and reflect para 58 of the NPPF. This would complement the references in policy EP H2:

'Townscape and heritage features should be used as a design framework in which to deliver the vision for High Path of an interpretation of the New London Vernacular. Within this framework proposals should create a strongly urban re-imagining of this style with excellent access to public transport. Proposals will be expected to integrate well with the surrounding urban form in terms of layout, scale and massing, responding to surrounding heritage assets and archaeological interest, whilst making the best possible use of land. How successfully this is done will be a key requirement against which design quality is assessed.'

A new sentence drawing attention to Appendix 3 and the Archaeological Priority Zone would be suitable here, for instance:

'The historic significance and context of the area is set out in Appendix 3; applicants should seek advice from the Greater London Archeological Advisory Service (GLAAS) at Historic England with regard to the Archaeological Priority Zone.'

MM21, Policy EP R1 Townscape (Ravensbury Estate)

In order to highlight heritage interest in paragraph 3.238 we recommend:

'In line with Policy OEP1, townscape landscape and heritage features should be used as a design framework in which to deliver the vision for Ravensbury ...'

Para 3.250 - Revealing the remains of Ravensbury Manor is a worthy aspiration but it needs to be undertaken in a way that will ensure its sustainability. It is therefore recommended that this passage includes a reference to advice from the Greater London Archaeological Advisory Service (GLAAS) at Historic England:

'The remains of Ravensbury Manor are hidden from view amongst dense vegetation within Ravensbury Park. Uncovering remnants of these ruins and providing interpretation would highlight the local history of the area and the park as part of the former estate of Ravensbury Manor and create a heritage focal point within the park. In this case, the advice of the Greater London Archaeological Advisory Service should be sought.'

MM23 EP R3 Movement and Access

New paragraph after 3.261 - we request that the archaeological potential is identified: *'To the south, the River Wandle presents a barrier to the residential area around The Drive. Whilst there is currently a footbridge, it is not conveniently located for north-south movement and is poorly overlooked. To enhance pedestrian links the opportunity to build a new bridge to create a new direct north-south pedestrian link from Wandle Road to the Ravensbury Estate could be investigated, taking account of the need to deter crime and promote community safety, particularly within the estate itself. The proposed footbridge would require consideration of the potential for non-designated archaeological assets.'*



MM26, Policy EP R6, Environmental Protection

In view of the potential archaeological interest, we recommend the following change to para 3.279:

The landscape character of the estate is reinforced by the back channel tributary of the River Wandle. There is scope to reinstate a historic river channel which runs alongside Morden Road, which could connect with the existing watercourses within Morden Hall Park. This will require a feasibility study for which archaeology will need to be a consideration

MM30 – Reference should be made to policy 7.8 Heritage assets and Archaeology of the London Plan, and Policy DM D4, Managing Heritage Assets, of the Merton Sites and Policies DPD , especially for OEP1, 2 and 3 (taking account of the above recommended inclusions for these policies).

I hope this response is helpful.

Yours sincerely

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