BUILT HERITAGE SCOPING REPORT

Merton Vision: 67 Clarendon Road,

London Borough of Merton

JAC26438

Merton Vision: 67 Clarendon Road, London Borough of Merton

PHP Nexus

JUNE 2020



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1.0 INTRODUCTION

This Built Heritage Scoping Report has been prepared by RPS Consulting Services UK Ltd, on behalf of PHP Nexus in relation to the proposed redevelopment of 67 Clarendon Road, London Borough of Merton, henceforth referred to as 'the Site'.

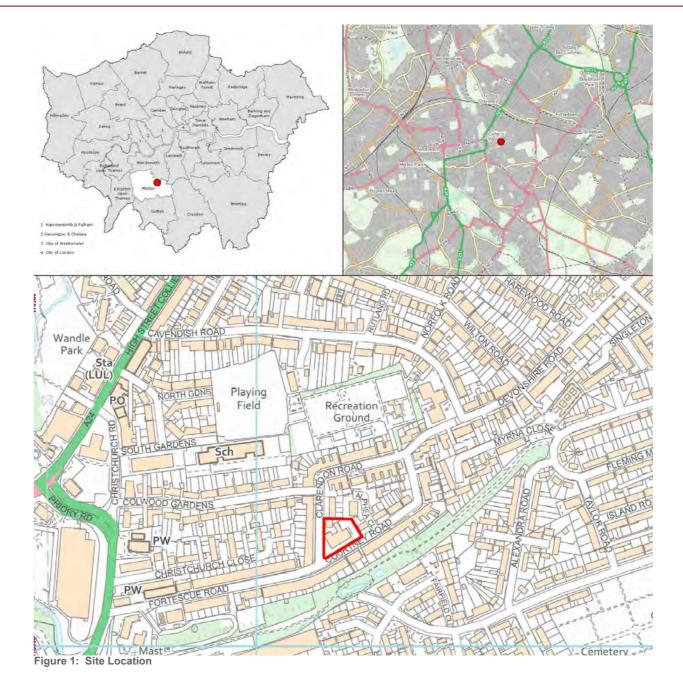
The Site is proposed for redevelopment as a medical facility and premises for Merton Vision. No detailed plans are available at this stage. The purpose of this report is to asses whether the redevelopment of the Site has any potential to affect the setting or significance of surrounding built heritage assets.

The Site comprises a former school building of early 20th Century date. The building is constructed in the Arts and Crafts style commonly used for municipal education buildings of the period. The Site building is not included on the National Heritage List for England or the Local List of non-designated built heritage assets maintained by the London Borough of Merton.

There are no designated or non-designated built heritage assets located in the immediate vicinity of the Site. A plot of all designated built heritage assets within a 500m radius is given as Figure 16. No built heritage assets within this radius have been identified as having the potential to be impacted by the development proposals. This is because the Site does not share a visual, functional or historic relationship with these surrounding built heritage assets.

This scoping report includes an appraisal of the relevant legislative framework and planning policy at national, strategic and local levels, with special regard to policies that relate to developments affecting the significance of built heritage assets, including listed buildings. This report will also provide an overview of the history of the Site and its surroundings, an appraisal of the Site's contribution to the significance of relevant built heritage assets and an assessment of the potential impacts of the proposed development on that significance.

All photos, maps and plans are for illustrative purposes only.



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2.0 LEGISLATIVE & PLANNING POLICY FRAMEWORK

2.1 LEGISLATION & NATIONAL PLANNING POLICY

The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving listed buildings and their setting.

The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.

The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.

It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.

For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their significance. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.

Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.

Paragraph 197 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

2.2 NATIONAL PLANNING GUIDANCE

National Guidance

Planning Practice Guidance (MHCLG)

The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

Overview: Historic Environment Good Practice Advice in Planning

The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. GPA1: The Historic Environment in Local Plans provides guidance to local planning authorities to help them make well informed and effective local plans. GPA2: Managing Significance in Decision-Making includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. GPA 3: The Setting of Heritage Assets replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2019, 2nd Edition), HEAN2: Making Changes to Heritage Assets (February 2016), HEAN3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEAN4: Tall Buildings (December 2015).

GPA1: The Historic Environment in Local Plans (March 2015)

This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early

engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

- Understand the significance of the affected assets;
- 2) Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical I interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

As with the NPPF the document defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.

This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.

The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:

- 1) Identify which heritage assets and their settings are affected;
- Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
- 3) Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- 4) Explore ways to maximise enhancement and avoid or minimise harm; and
- Make and document the decision and monitor outcomes.

HEAN7: Local Heritage Listing (May 2016)

Historic England also provides guidance on local heritage assets. The publication *Local Heritage Listing: Historic Advice Note* 7 is relevant in this instance. This advice note supports local authorities and communities to introduce a local list in their area or make changes to an existing list, through the preparation of selection criteria, thereby encouraging a more consistent approach to the identification and management of local heritage assets across England.

HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

2.2 NATIONAL PLANNING GUIDANCE

Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset.

To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.

To assess the impact to the significance of a heritage asset Historic England state that it is necessary to understand if there will be impacts to built fabric or the setting of a heritage asset and how these contribute to the heritage asset's overall significance. Where the proposal affects the setting, and related views, of a heritage asset, or assets, it is necessary to clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.

This enables an assessment of how proposals will affect significance, whether beneficial or harmful. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

Adopted London Plan

The London Plan was adopted in March 2016 and is in the process of being superseded, however the following policies remain relevant in this instance:

POLICY 7.4 LOCAL CHARACTER

Strategic

A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B Buildings, streets and open spaces should provide a high quality design response that:
 - A) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
 - B) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
 - C) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings

- D) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- E) is informed by the surrounding historic environment.

LDF preparation

Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

POLICY 7.8 HERITAGE ASSETS AND ARCHAEOLOGY

Strategic

- A) London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B) Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C) Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D) Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E) New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public onsite. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

LDF preparation

- F) Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.
- G) Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

Draft London Plan

The Greater London Authority (GLA) consulted on the Draft New London Plan between December 2017 and March 2018. The GLA further published an updated version of the draft London Plan with minor amendments in August 2018. The examination in public commenced in January 2019 and concluded in May 2019. An intend to publish London Plan, including the Mayor's suggested changes, was published in December 2019. Whilst the policies of the intend to publish London Plan have not yet been formally adopted, they do carry weight and are a material consideration in planning decisions. The relevant draft policies have been included within the sections of the assessment below. Of particular relevance to heritage assets is draft policy HC1 as follows:

HC1 Heritage and Conservation Growth

- A. Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
- setting out a clear vision that recognises and embeds the role of heritage in place-making
- utilising the heritage significance of a site or area in the planning and design process
- integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed.

2.3 LOCAL PLANNING POLICY & GUIDANCE

Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Local Planning Policy

In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

London Borough of Merton Local Plan

Local Development Framework Core Planning Strategy (Adopted July 2011)

The following Strategic Objective within the Core Planning Strategy is relevant to this assessment;

Strategic Objective 8

To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough. We will achieve this by:

- a. Conserving and enhancing the historic environment;
- b. Applying high quality design standards to all new development;
- c. Enhancing the public realm.

Policy CS 5 Wandle Valley

The Wandle Valley will act as a strategic fulcrum in bringing together initiatives that will contribute towards bridging the gap between the east and the west of Merton. Our objectives to deliver this vision are to:

..... G. Conserve and enhance archaeological sites and protect conservation areas in the Wandle Valley and raise awareness of this heritage including Merton Priory and Merton Abbey Mills......

Policy CS 14 Design

All development needs to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to contribute to Merton's sense of place and identity. We will achieve this by:

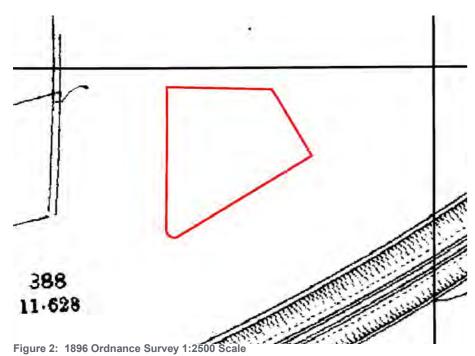
- a. Conserving and enhancing Merton's heritage assets and wider historic environment particularly the valued centres, suburban neighbourhoods, industrial heritage and iconic green spaces, through conservation areas, statutory and locally listed buildings, scheduled ancient monuments, historic parks and gardens and archaeological sites and other non-designated heritage assets;
- b. Promoting high quality sustainable design that:
 - i. meets urban design and climate change objectives;
 - ii. responds to the 'distinctive areas of the borough';
 - iii. improves Merton's overall design standard;
 - iv. responds to heritage assets and the wider historic environment to enhance local character and distinctiveness:
 - v. retains and adapts existing buildings where appropriate to reduce CO2 emissions and secure sustainable development;
 - vi. provides functional spaces and buildings with adequate internal amenity:
 - vii. enhances community safety.
- c. Protecting the valued and distinctive suburban character of the borough by resisting the development of tall buildings where they will have a detrimental impact on this character. Tall buildings may therefore only be appropriate in the town centres of Colliers Wood, Morden and Wimbledon, where consistent with the tall buildings guidance in the justification supporting sub-area policies, where of exceptional design and architectural quality, where they do not cause harm to the townscape and significance of heritage assets and the wider historic environment, and where they will bring benefits towards regeneration and the public realm. Even with the identified centres, some areas are sensitive to tall buildings.
- d. Encouraging well designed housing in the borough: (a) by ensuring that all residential development complies with the most appropriate minimum space standards; (b) by requiring existing single dwellings that are converted into two or more smaller units of accommodation to:
 - i. incorporate the re-provision of at least one family sized unit where resulting in the loss of an existing family sized unit;
 - ii. comply with the most appropriate minimum space standards;

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- iii. not result in an adverse impact on the suburban characteristics of the streetscape.
- e. Requiring the development and improvement of the public realm to be accessible, inclusive and safe, simplified in design and unified by Merton's green character to create an environment of real quality.
- f. Using objectives, proposals and policies within national, regional and local policy, including local guidance or evidence such as design guides, character appraisals and management plans to shape new built form and enhance the overall design quality of the borough.

3.0 ARCHITECTURAL & HISTORICAL APPRAISAL

3.1 HISTORICAL DEVELOPMENT AND MAP PROGRESSION



Prior to the construction of the Site buildings and proximate residential areas, the Site lay within an agricultural field north of the rail line, forming part of Merton's agricultural hinterland.



By the late 1960s the Site building had been further extended, with the infilling of the south western and south eastern corners. These alterations are likely to have been accompanied by internal layout alterations as part of the modernisation of the school to meet the changing education needs of the later 20th Century. The vicinity of the Site remains characterised by terraced housing and the Site building forms part of the Alphea Middle School complex.

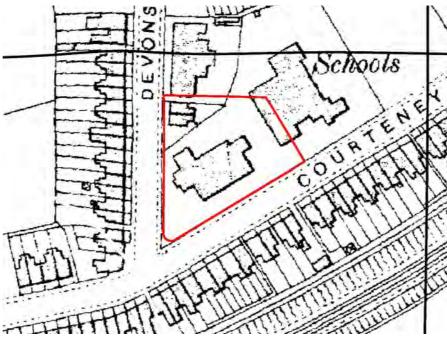


Figure 3: 1914 Ordnance Survey 1:2500 Scale

The 1914 OS map illustrates the considerable built expansion of Merton as it was subsumed by the growth of Greater London in the early 20th Century. The 20th Century date of the Site buildings preclude a historical or functional association with the surviving elements of local historic built development, as represented by the Wandle Valley Conservation Area and relevant designations. Emily Villa is shown to have comprised two semi-detached residences.



By 1991 the larger school building east of the Site had been demolished and redeveloped for housing. No further alterations are apparent within the Site.



The Site buildings were constructed in a broadly Arts and Crafts style typical of public and especially education building of the period. The buildings soon underwent alterations as indicated by the extension to the south west of the school building shown on the 1951-53 OS Map. Emily Villas is shown as a single, much extended residence, possibly indicating demolition of the original semi-detached houses within the Site.

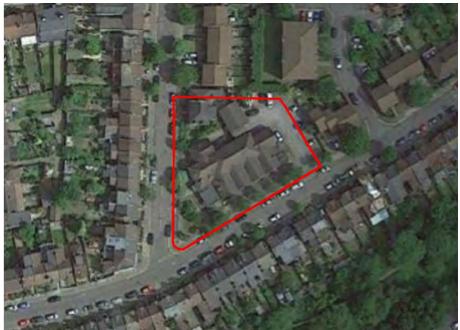


Figure 7: 2015 Aerial Photograph (Google Earth Image)

The most recent available aerial photograph (2015) does not indicate further plan form changes to the principal Site building, though a new ancillary building has been constructed to the immediate north. There are no notable changes in the vicinity of the Site.

4.0 ASSESSMENT OF SIGNIFICANCE

4.1 SITE ASSESSMENT

The following assessment is based on desk based research only and no Site visit has been carried out. The assessment is sufficient to understand that the Site buildings are not likely to be considered as non-designated built heritage assets.

The Site contains a much altered School building and ancillary buildings of early 20th Century date, designed in the Arts and Crafts style. The building is largely single storey with two storey element at south west corner, constructed in red brick with a tiled roof. The building retains many of its timber sash windows, though there are some later replacements. The roof of the building includes a mix of hip and gable treatments that enhances the legibility of the building's original internal layout and is typical of asymmetric Arts and Crafts themes.

The second major building within the Site is a private residence, Emily Villa, the available historic mapping indicates this two storey residence has been formed from a re-fronted and extended pair of semi-detached homes. Emily Villa is also constructed in red brick and slate in the Arts and Crafts Style and may represent staff accommodation for the school.

Historic England's HEAN7: Local Heritage Listing (May 2016), identifies that local authorities may seek to include buildings on a local list by assessing them against a wide criteria. This criteria includes age, rarity, aesthetic interest, group value, archaeological interest, archival interest, historical association, designed landscape interest, landmark status and social and communal value.

As a result of the common use of Arts and Crafts architectural themes in School buildings and residences in the early 20th Century, the Site buildings in terms of its materiality and style, cannot be considered to have a high degree of rarity. This, together with their 20th Century date and relatively unexceptional levels of craftsmanship, leaves them only as a good example of wider architectural trends, rather than a standalone example of high architectural and historic interest.

The potential architectural interest of the buildings is limited by the lack of intactness in key elements of their built fabric. A Schedule of Dilapidations, prepared by Simpson Hilder Associates Ltd (March 2020) has found that the school building's sash windows are in a poor state of repair, as is much of its internal joinery. The condition survey notes the widespread use of poor quality modern materials such as chipboard and vinyl, indicating that previous refurbishments have resulted in the removal of any original decoration. Parts of the roof are also in poor repair, with damage recorded to the leadwork and flashing, leaving the building vulnerable to weathering.

Emily Cottage similarly has undergone alteration and refurbishments of generally poor quality in the later 20th Century. The Schedule of Dilapidation (March 2020) records Emily Villa as having damage and weathering to surviving joinery and roof elements.

Despite the extent of later alteration and poor state of repair, the Site buildings have a degree of aesthetic interest and landmark value in that they are appreciable as belonging to a particular early 20th Century architectural trend that contributes positively to the street scene. The school building can be said to have a degree of communal value in that the school belongs to the first phase of local built development and has served the community throughout the 20th Century. The Site buildings are however distinct in terms of style from the surrounding terraced houses and so is not considered to have a group value with them, despite their broadly contemporaneous date. The Site buildings have a low group value with each other, derived from their architectural similarity, though it cannot be confirmed if they have a historic functional association.

Based on the available information the Site buildings can be understood as having only a very low degree of architectural and historic interest for their aesthetic value, positive contribution to the street scene and evidential value as being representative of broad early 20th Century architectural trends. The Site buildings are not formally recognised as non-designated built heritage assets through inclusion on the London Borough of Merton's Local List.

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Figure 8: April 2018 Google Maps Streetview - View east on Clarendon Road

The building, while more extensive than the surrounding residences, does not rise above them in terms of height. In views of the school from adjoining streets, the flanking terraces, which are also generally of early 20th Century date, give a strong sense of enclosure.



Figure 9: April 2018 Google Maps Streetview - View north on Courtney Road

Each of the principal classrooms lies under its own gable roof, raising the legibility of the building's internal layout and representing each classroom in the manner of a much smaller schoolhouse.

4.1 SITE ASSESSMENT





Figure 11: Emily Villa, Google Streetview Image (2019) looking east on Clarendon Road

4.1 SITE ASSESSMENT



4.1 SITE ASSESSMENT

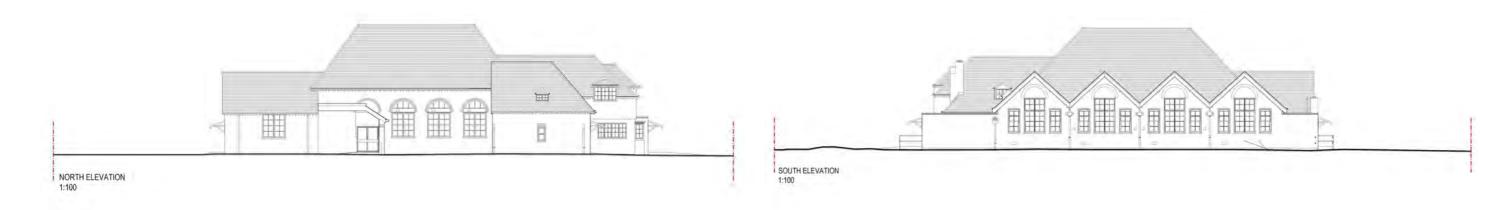




Figure 14: Existing North & East elevations. Do not scale from this drawing.



Figure 15: Existing South & West elevations. Do not scale from this drawing.

4.3 IDENTIFICATION OF BULIT HERITAGE ASSETS AND POTENTIAL IMPACTS

The Site buildings are not formally recognised by the Local Planning Authority as non-designated built heritage assets through inclusion on the Local List. The Site buildings have only a very low degree of architectural and historic interest and have both undergone extensive alteration.

There are no designated or non-designated built heritage assets, as identified on the London Borough of Merton Local List, located within the immediate vicinity of the Site.

The Site has no appreciable visual relationship with any designated built heritage asset shown on Figure 16.

The Site does not contribute to the significance of any built heritage asset through a known or legible historical association or functional relationship. The Site is not an element in how the significance of any built heritage asset is appreciated within their respective immediate and close settings.

The proposed re-development of the Site is considered to have no potential impacts on any designated built heritage assets or formally recognised non -designated built heritage assets.

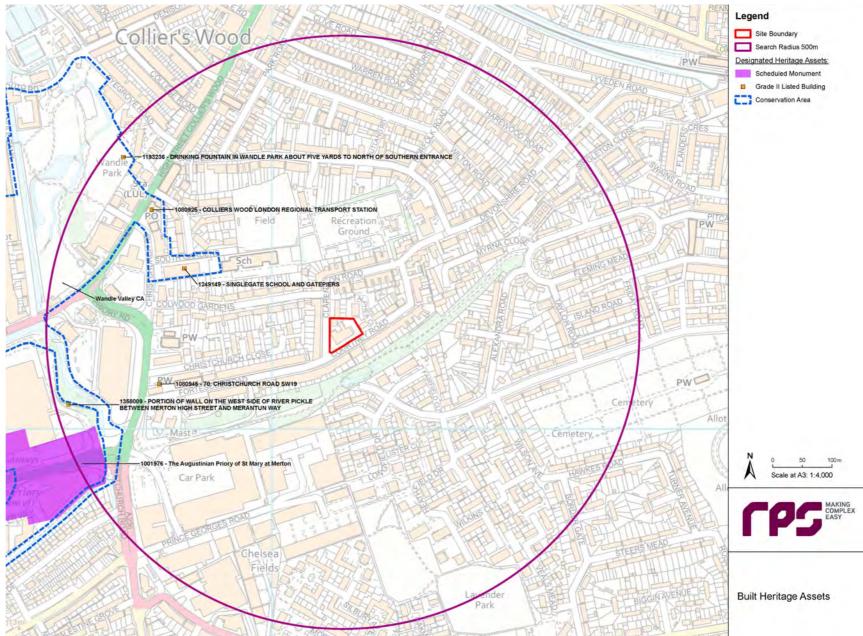


Figure 16: Designated Built Heritage Assets Plot

