



Historic England

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Our ref: PL00523620  
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By email: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Dear Christine,

## Re: Pre-Publication Draft Local Plan (Regulation 18) Consultation

Thank you for notification of your draft Regulation 18 Local Plan. 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 and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document. I have provided a summary of our advice below and more detailed comments in Appendix 1. These comments have been formed in line with the NPPF (2019) and with reference to draft emerging London Plan which will become part of the Borough's development plan when adopted (planned for 2<sup>nd</sup> March 2021).

### Summary

- A lot of good work has been done to develop a positive strategy for the historic environment. However, this good work is undermined by the spatial, place-based elements of the plan.
- There are concerns regarding the location of tall buildings and the evidence to support these. At present it is not clear where exactly they can go.
- The locations appropriate for tall buildings need to be refined and maximum height parameters need to be set (see London Plan 3.9.2). The appropriateness of allocation capacities and associated development/design principles will be dependent on this. We also need to know this to determine whether further heritage assessments would be required at plan stage.
- The plan does not explore alternative options to tall buildings when it comes to delivering high-density development.
- The Urban Design Study makes detailed recommendations which have not been transposed into the plan policies. We recommended that the plan is amended to align more fully with the evidence. In places, the plan proposals conflict with the Urban



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Design Study findings. More precise design guidance is required to support allocations to protect heritage.

- Buildings must be expressed in metres above ground level and AOD. It is unhelpful to express heights in numbers of storeys.
- It would be helpful to identify which site allocations have been carried over from the adopted plan and to provide an update on their status.

The draft plan, in its present form, is unjustified and we do not consider that it will be deliverable, effective or consistent with the London Plan and NPPF policies, or with the statutory obligations set in national legislation. We do not consider the plan to be sound at this stage.

In preparation of the next draft, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.

Finally, 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.

I hope that these comments will be helpful. I am happy to comment on any evidence documents or assessment methodologies before the next version of the plan is published.

Regards

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## Appendix 1: Detailed Comments

### HELAA:

We question some of the assumptions made to determine site capacity. The HELAA uses the previous version of the London Plan to determine capacity i.e. the density matrix. The emerging London Plan (due to be adopted imminently 2<sup>nd</sup> March 2021) does not contain such a matrix, instead it promotes a design-led approach to site capacity. An element of design-led work must be carried out at plan-making stage, numbers will necessarily be indicative but a more realistic, London Plan compliant indication of capacity should be provided in the plan.

### Place Policies:

- The plan has not adopted a design-led approach to defining sites capacities as required by London Plan policies GG2.D and D2.
- The Urban Design Study makes detailed recommendations. It is important to ensure that these are translated into the plan policies to ensure that they are justified and therefore sound.
- The Urban Design Study identifies negative elements within Wandsworth, but the plan does not seek to address these. In the interest of developing a positive strategy for the conservation and enhancement of the historic environment, opportunities to improve the quality of the historic environment ought to be highlighted and encouraged within the plan.

### Policy LP3: Historic Environment

- We welcome this strong, well written policy. We do recommend some minor changes however to ensure soundness:
- **Part D** – it would be helpful to expand this further to require applications for demolition to be accompanied by a legal agreement, or condition, which ensures the building is not demolished until a replacement development is ready to be implemented. This is to avoid the creation of gaps and empty plots within conservation areas, to the detriment of their character and appearance.
- **Part E** – we generally advise against duplicating the NPPF, in line with NPPF 16.f. In any case this part of the policy does not accurately reflect the NPPF 194 tests. Substantial harm to assets of the highest grade should be *wholly exceptional*, and to lesser graded assets, *exceptional*. The term “resisted” is a weaker application. Any harm should require clear and convincing justification. Equally, great weight should be attached to the conservation of the historic environment regardless of the degree of harm.
- We are particularly pleased to see appropriate reference to Heritage at Risk, non-designated heritage, shopfronts, and the recognition that heritage is an irreplaceable resource.





## Policy LP4: Tall Buildings

- **Part A** - We welcome the clear local definitions for tall buildings.
- **Part B.3 and 4, and 14.48**- The policy provides support for landmark buildings but provides very little guidance as to where they should go or how a building will be judged a landmark, not does it provide a distinction between a landmark tall building and a normal tall building. Leaving the decision as to where landmarks ought to go up to applicants could result in uncontrolled landmark buildings coming forward. As such a situation may arise where every application for a tall building is submitted on the basis that it is a landmark. Landmarks are a strategic issue and not every building can be landmark. Landmarks need to be planned to avoid undermining the point and creating illegibility. It is therefore reasonable to expect the Council to provide strategic guidance on this within the local plan. Ideally the plan would indicate where existing landmarks are and use this to help plan where additional landmarks could be located.
- The provision of a definition for landmark buildings would be helpful. Landmark buildings are those simply distinct from their surroundings, they do not equate to tall. This does not come across in the plan.
- The evidence identifies existing landmark buildings that have negative impacts as a result of their massing, monotonous nature, and lack of local distinctiveness. The plan could positively seek to address this harm by placing an emphasis on the enhancement of these developments should subsequent proposals come forward.
- **Part B.10** - talks about striking a balance between optimising views of the river (when considering riverside tall buildings) and protecting views/spaces behind. Views of the river from within tall buildings is not a planning consideration or a public benefit, it is a private benefit. It is not clear then why a balance ought to be struck and public benefits potentially compromised. Nor is there any evidence to show that internal views of the river from within new development should be a priority that warrants a positive policy response.
- **14.47** - We welcome reference to Historic England's Advice Notes on tall buildings.

### Tall Building Locations:

- **Riverside** - We are concerned with the extent of the boundaries considered appropriate for tall buildings. Especially as the plan focuses the tallest buildings along the riverside. Much of the riverside has already been developed by tall buildings and intensifying this could overwhelm the riverside and create a canyon like effect.
- **Battersea Park RPAG** - all three sides of Battersea Park would be surrounded by tall buildings. The Urban Design Study states that the Park is *valued for its cultural and historic character, sense of openness and as a backdrop to views across the river. Also valued for its relative sense of tranquillity<sup>1</sup>*. It also tells us that *the high value and high susceptibility of the area mean that any significant change is unlikely to be appropriate<sup>2</sup>*. It goes on to state that a strategy to conserve the area is most appropriate. The Study

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<sup>1</sup> Page 78 Urban Design Study 2020

<sup>2</sup> Page 79 Urban Design Study 2020





makes a specific design recommendation which is to preserve the openness of the park and the riverside by resisting development which would affect this perception. The plan, which identifies areas in the immediate vicinity as being appropriate for tall buildings, does not align with the evidence.

- It does not appear as though the setting of either the Thames or the Park have been taken into consideration when determining suitable locations for tall buildings. There is likely to be scope for development that meets the definition of a tall building to be constructed here, but the plan should provide maximum parameters to prevent uncontrolled skylines, and the formation of a canyon like wall of development.
- The areas identified as appropriate for tall buildings should be further refined. It is unlikely that everywhere within the area boundaries could accommodate tall buildings. This will also in part deal with the issue of appropriate areas being immediately adjacent to inappropriate areas. Alternatively, a greater amount of detail should be included to guide development as to how border sites should be treated i.e. technically tall but still comparatively low allowing development to step up into less sensitive areas.
- The Urban Design Study does not consider the impact of tall buildings in area G1 upon Fulham palace. It is important that buildings do not loom above the tree line that surround the palace grounds on the north back of the river.
- The Appendix 2 maps are lifted out of the Urban Design Study, but this removes them from their context. The Study uses these as broad areas of search but then drills down to look at specific sites. It does not ultimately say the entire areas are appropriate.
- Some of the massing in the Urban Design Study suggests spaced out, incoherent patterns of tall buildings which is unhelpful in townscape terms e.g. the riverside cluster.
- The plan identifies large swathes of the riverside land as being suitable for the tallest buildings within the borough. There are existing tall buildings in this location and there may be scope for additional buildings of a substantial size but the present of existing tall buildings is not adequate to justify more. Especially as the plan potentially allows unlimited heights and does not consider the harm that these existing buildings have caused. London Plan policy D9.C.1.F makes it clear that tall buildings should protect the open quality of the river, including views and avoiding a canyon like effect. The plan promotes the riverside as a destination for tall buildings which may conflict with the London Plan.

## Policy LP7: Small Site Developments

- **Part C** – we welcome the presumption against back garden development. This has major benefits for the historic environment, character, and sense of place in addition to having ecological and environmental benefits. Notwithstanding this we have concerns regarding the following sentence: *In some cases, a limited scale of back garden development may be considered acceptable if it complies with the requirements set out in Part B above. Development on back garden sites must be more sympathetic in*



*scale and lower than frontage properties* -this does not add value given that all back land/infill development would need to comply with part B as it is, while its inclusion undermines the presumption against garden development. We advise that this sentence is omitted.

#### LP16: Public Houses and Bars

- We strongly support this policy and welcome the recognition of the heritage value of public houses.

#### LP10: Responding to Climate Change

- Historic England advocates the reuse, repair, upgrade, and retrofit of existing buildings rather than demolishing and rebuilding. We support an approach that focuses on understanding sustainability over the long term<sup>3</sup> and recommend that the policy recognises this more explicitly.
- By caring for and reusing historic buildings and heritage assets we can save energy and carbon dioxide through better maintenance, management and energy efficiency measures; and avoid the carbon dioxide of constructing new buildings and places. Paragraph 15.8 should be amended to better recognise the positive role that existing buildings have to play in addressing carbon costs.
- The policy talks about sustainably sourced materials but is silent on the importance of durability (London Plan 3.3.10). The carbon impact of buildings is not only in their operational carbon or energy efficiency – it is also in the carbon embodied in their materials and labour. This includes their manufacture, transportation, installation, durability, reparability and reusability. We advise that the policy is amended to recognise the need to consider the whole-life carbon of materials in decision-making. When you take the long view older buildings and traditional materials are often extremely effective.
- We advise that the policy is amended to refer to the importance of a whole building approach to retrofit. Modern buildings and historic buildings are different. Not just in their materials, but in their design and the way they function. Understanding how they function and all the factors that affect their energy use is critical for making decisions that improve the sustainability of structures we change, maintain and manage in the future. Factors include: construction, location, environment, historic significance, services and occupant behaviour. We call this the ‘whole building approach’ and it should be the starting point for any energy-efficiency improvements.
- We have published the following technical guidance and information which may be of use. Going Forward it may be helpful to draw attention to our guides in a bibliography or to provide links on the relevant GLA webpages where appropriate:

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<sup>3</sup> Historic England's Position on Climate Change and Sustainability <https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/>



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Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historic and traditionally constructed buildings  
<https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/>

Energy Efficiency and Historic Buildings: Energy Performance Certificates  
<https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/>

Energy efficiency and traditional homes, Historic England Advice Note 14  
<https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/>

A full list of all out technical guidance on energy efficiency can be found in our publication directory: <https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/>

With part funding from Historic England, the STBA has published guidance on retrofitting traditional buildings based on current research and practice. Planning Responsible Retrofit of Traditional Buildings <https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/>



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