



Historic England

Wandsworth Council  
Planning Policy,  
Environment and Community Services,  
Town Hall,  
Wandsworth High Street,  
London,  
SW18 2PU

Our ref: PL00523620  
Date: 25/02/2022

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

Dear MsCook,

## Re: Wandsworth draft Regulation 19 Local Plan (January 2022) consultation

Thank you for your notification of the above consultation. 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.

### Historic England Advice

The Regulation 19 plan represents heritage well throughout and provides a good framework for its management. We welcome the design and character-led approach to determining site capacity. This aligns with the London Plan and its draft guidance. Suitable SA objectives relating to heritage have been included to assess the likely impacts of the allocations. We have provided some detailed comments in Appendix 1 below. The plan is based on a robust evidence base and makes appropriate reference to the supporting studies throughout. We consider the plan to be sound subject to some minor amendments set out in Appendix 1.

### Conclusion

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

Katie Parsons  
Historic Environment Planning Adviser



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## Appendix 1

### Site allocations:

The site allocations are better set out in the plan and it is easier to navigate as a result. The allocations are developable in principle, we advise to make sure all heritage assets within and near-by are identified in the allocation policies. We are pleased to see that the allocations reflect the findings of the revised Urban Design Study which will be an important document to consider when making planning decisions.

The improved tall and mid-rise buildings policy will provide a good set of parameters for the development of the allocations and provides a clear framework for their delivery.

### LP3 Historic Environment

This is generally a robust policy and reflects the tests set out in the NPPF. Part I is a new addition on climate change adaptation but there is no supporting text in relation to this criterion. It would be helpful if this was addressed in the supporting text. It would suffice to make links to the climate change chapter if that is a preferable route, otherwise the criterion sits conspicuously within the policy.

The new table of local views is welcome, but it would be helpful to explain in the text whether or not there have been any changes to these since the adoption of the current plan as a result of decision that have been made.

### LP4 tall and Mid-Rise Buildings

The plan contains a major shift from the regulation 18 version in how tall buildings are being approached. The shift to a hierarchical approach of tall, and mid-rise is helpful, and the definitions are sensible. This approach is based on the Urban Design Study and helps emphasise that mid-rise buildings can still deliver high density development. Some specific comments are:

- Parts B, C, and D of the policy provide more clarity as to where tall buildings can go and contains a new reference to need to consider cumulative effects. We support this amendment which brings the plan more in line with the London Plan.
- Part F includes a new provision for mid-rise buildings and makes improved reference to the Urban Design Study. We support this amendment.
- Part G again provides additional clarity to help applicants and decision makers.
- New figure 14.1 is helpful and adds clarity.
- The policy overall makes better links to urban design study which will add weight to it as a factor in decision making.
- Some of the height parameters in Appendix 2 are very wide. We appreciate that this is guided by the colour grading but perhaps another link could be made to the Urban Design study here and a character-led approach at 23.15.

## LP10 Responding to the Climate Crisis

We welcome the inclusion of policies to address climate change. We advise that the plan highlights the risk of maladaptation as this can make emissions worse, impact upon human health, can increase fuel poverty if buildings become less efficient as a result, as well as being harmful to heritage.

- Part G *Retrofitting of existing buildings, through the use of low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported* This criterion should make reference to the risks posed by maladaptation. It is important the policy supports the right retrofit and adaptation of buildings rather than any retrofit or adaptation.
- 15.10 talks about a conflict between conservation and retrofit, we advise that this wording is amended to reflect nuance. The two goals are compatible, it is entirely possible to retrofit/improve the performance of any building, including historic buildings, and it is unhelpful for the plan to suggest that there is a conflict.
- When considering the potential depth often required for ground source heat pumps it would be helpful to make reference to the potential for archaeology to be affected. There are also a large number of underground structures in London e.g. tube tunnels, basements, sewer tunnels that might prevent ground source heat pumps being installed.
- We welcome recognition that overheating is the main issue facing London.
- Carbon offset should be a last resort and we suggest this is mentioned in the plan

## LP11 Energy Infrastructure

It might be helpful to consider area-based solutions as well as building by building solutions, e.g. shared energy sources for new development.