

STATEMENT OF COMMON GROUND

LB LEWISHAM/ English Heritage
14 January 2010

Schedule 1: Shows where Agreement was Reached
Schedule 2: Shows where Agreement was not Reached or
Partial Agreement was reached

SCHEDULE 1

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
11 (11) Section 2.2 Para 2.7	<p>The borough is primarily residential in nature, ranging from a suburban character in the south to higher density neighbourhoods in the north. These extensive areas of housing are punctuated with a network of small and large town centres, local shopping parades, employment areas of varying quality and job density, many parks and green spaces, conservation areas and railway corridors <u>and are overlaid by a range of heritage assets. There are This includes</u> 26 conservation areas covering approximately 654 ha. and 516 listed buildings. The borough falls within the catchment of the River Ravensbourne and its tributaries. along which are located many significant areas of green space, including Waterlink Way. Some parts of the borough fall within an area of</p>	<p>It is still with concern that the wide range of heritage assets are not explicitly expressed in this important introduction to the spatial character of the Borough. Especially as the character of the Borough is defined by its historical development and the positive legacy that collectively help define its local distinctiveness. Key notables that are missing include the Maritime Greenwich World Heritage Site buffer zone, Borough's archaeology, Scheduled Monuments and Registered Parks and Gardens. This should be recognised in the text in order to provide a complete spatial 'picture' of the Borough.</p>	<p>Propose the following amendments:</p> <p>The borough is primarily residential, ranging from characterised by 20th Century a suburban character <u>suburbs</u> in the south to higher density <u>older Victorian</u> neighbourhoods in the north. These extensive areas of housing are punctuated with a network of small and large town centres, local shopping parades, employment areas of varying quality and job density, many parks and green spaces, <u>railway corridors</u> and are overlaid by a range of heritage assets. <u>This includes</u> 27 conservation areas covering approximately 654 ha., and <u>some 550 statutorily listed buildings, areas of archaeological priority, Scheduled Ancient Monuments, Registered Parks and Gardens and locally listed buildings.</u></p>	Agreed

¹ Numbers in brackets indicate the page number in the Core Strategy tracked changed version (incorporating the changes shown in the Schedule of recommended amendments to the Core Strategy, October 2010)

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
	flood risk, although importantly most of the borough is protected by flood defences, including the Thames Barrier.		<p><u>The UNESCO declared Maritime Greenwich World Heritage Site is adjacent to the borough's north eastern boundary, and the World Heritage Site buffer zone falls within the borough at Blackheath.</u></p> <p>The borough falls within the catchment of the River Ravensbourne and its tributaries along which are located many significant areas of green space, including Waterlink Way. Some parts of the borough fall within an area of flood risk, although importantly most of the borough is protected by flood defences, including the Thames Barrier.</p>	
20 (23) Section 2.7 Para 2.48 – 2.49 (Para.	2.48 Lewisham has a varied portfolio of parks and other green spaces from those with strong historical links, such as Beckenham Place Park, Horniman Gardens and Blackheath, to those that have been created through community campaigning, such as the Sue Godfrey Local Nature Reserve.	<p>We note that additional text has been added to highlight the biodiversity value of the Borough's parks and open spaces and their contribution to the local character.</p> <p>However it is unfortunate that the heritage value of these spaces has</p>	<p>Propose the following amendments:</p> <p>(2.49) The Council recognises the value of urban green spaces in their contribution to regeneration and the quality of life; they give opportunities for people to have contact with the natural world and are essential for</p>	Agreed

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
2.48- 2.51)	<p>Lewisham is one of the greenest parts of south-east London. Over a fifth of the borough is parkland or open space. These areas play an important environmental (biodiversity) and recreational role as well as defining and continuing to contribute to Lewisham's overall character. The Council also has 21 nature conservation areas directly under ecological management, each with its own unique features.</p> <p><u>(2.49) The Council recognises the value of urban green spaces in their contribution to regeneration and the quality of life; they give opportunities for people to have contact with the natural world and are essential for providing habitat for biodiversity. Lewisham's natural heritage has helped shape the borough's development and continues to be a reason why people choose to live and work here. Names such as Lee</u></p>	not been given equal consideration or recognition. PPS5 is clear in that heritage assets includes not just buildings, but also spaces whether as individual entities or as a component of the significance of heritage assets such as a listed building or conservation area. This should be recognised in this section.	<p>providing habitat for biodiversity. Green spaces Lewisham's natural heritage has helped shape the borough's development and continues to be a reason why people choose to live and work here. Names such as Lee Green, Grove Park and Forest Hill give an idea of the landscape from which Lewisham development. Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. <u>These open spaces have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets. For example, the open character of Blackheath is an integral element of the Blackheath Conservation Area and supporting element to the outstanding universal value of the</u></p>	

Schedule 1 showing Areas where Agreement has been reached

Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
	<p><u>Green, Grove Park and Forest Hill give an idea of the landscape from which Lewisham development. Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields.</u></p> <p><u>(2.50) The role of rivers (Thames, Ravensbourne, Quaggy and Pool rivers and Deptford Creek) and their potential when properly protected, managed and restored (re-naturalised) also contributes to recreation and well-being, and can contribute to the borough's amenity of bio-diversity value. The borough's river and waterway network are natural assets which are part of effective action on climate change, contribute to the restoration of depleted bio-diversity and create</u></p>		<p><u>Maritime Greenwich World Heritage Site.. The small area of open space within the Culverley Green Conservation Area provides a welcome element of informality to the grid pattern of tree lined streets.</u></p> <p>(2.50) The role of rivers (Thames, Ravensbourne, Quaggy and Pool rivers and Deptford Creek) and their potential when properly protected, managed and restored (re-naturalised) also contributes to recreation and well-being, and can contribute to the borough's amenity of bio-diversity value. The borough's river and waterway network are natural assets which are part of effective action on climate change, contribute to the restoration of depleted bio-diversity and create rewarding places for people to enjoy and learn from. <u>The Core Strategy can ensure that their role as heritage assets is enhanced. This can be</u></p>	

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
	<u>rewarding places for people to enjoy and learn from.</u>		<u>reflected in the plans for Lewisham Gateway where the confluence of the Quaggy and Ravensbourne rivers should be enhanced reminding all of the role the rivers played in the historic development of Lewisham Town Centre.</u>	
22 (23) Section 2 Lewisham Today	Not currently included	Concerned that the findings of the Borough Wide Character Study have not been fully integrated into the Core Strategy. For example the information on the historic development of the Borough could be used to inform Section 2 of the Core Strategy, so that there is an understanding of the historic environment and the supporting text to Core Strategy Policy 16.	The Council proposes to include the following as additional text after the section 'Parks and Gardens' and before 'Community'. Character and heritage assets <u>Lewisham's landscape is a gentle bowl, focussed around the Ravensbourne, Quaggy and Pool Rivers which flow into Deptford Creek. Elevated views play a significant role in the character of the borough. There is a general gradient of development across the borough from oldest in the north to more modern in the south. As London has grown, the borough has seen successive rounds of urbanisation moving south across the</u>	Agreed

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
			<p><u>borough.</u></p> <p><u>The urban origins of the borough are focussed on river-related uses including shipyards and victualling yards. There are some significant remnants of historic development and urban grain in the north, although much was lost during World War II and is now occupied by post-war development. The southern-ward expansion of the borough's urban area in the Victorian period was driven by the development of the railways. Neighbourhoods such as Forest Hill and Sydenham saw dramatic change as they were linked to central London via rail.</u></p> <p><u>Overall, the combination of extensive bomb damage, garden grabbing and incremental historical growth has resulted in huge diversity across the borough. Changes in building typology can happen abruptly and frequently</u></p>	

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
			<p><u>over small geographical areas. This is particularly true in the north of the borough, where the 'churn' in the built environment caused by these factors has created an attractive and at times striking diversity.</u></p> <p><u>The early railway development in the northern part of the borough took routes through existing areas of development and on predominantly flat ground. These railways created isolated cells of development and poor links to the surroundings areas as seen in neighbourhoods such as New Cross and Deptford. The later railway expansion to the south proceeded in hand with development and followed the topography. This expansion established a more natural relationship between the railway and the landscape. Thus, the railway is less of an imposition on the urban character in central and southern parts of the borough.</u></p>	

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
			<u>'The complex historical development of the borough has left a legacy of distinctive neighbourhoods which shall be understood and used to inform future developments, so ensuring the positive contributions of the historic and local character are appropriately protected and enhanced.'</u>	
26 (27- 28) Section 2.9 Para 2.57 (Para 2.59)	The Council's Schedule of recommended amendments includes the following additional bullet point to this paragraph: <ul style="list-style-type: none"> • <u>Protect and enhance vulnerable heritage assets for their intrinsic heritage value and to ensure that locations and designs of new development are informed by an understanding of the borough's historic character.</u> 	Welcome the additional text and its reference to protect and enhance heritage assets and the need to understand the Borough's historic character.	No response required.	No further comments to make.
28 (30) Section 3.5	The benefits of new development need to be maximised for all in the community and will be central to addressing and reducing issues	It is still with disappointment that the historic environment is not explicitly recognised as a pillar of building a sustainable community. As stated	Propose the following amendments: The benefits of new development need to be maximised for all in the	Agree with the proposed changes and its reference to the historic environment.

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
Para 3.9	related to deprivation in order to improve education, employment and training opportunities, and reduce health inequalities. New development can contribute to both the provision and enhancement of existing services and facilities, where demand for them arises from the new populations. There is also a role to play in creating a sense of place and community through the high quality design of buildings and spaces that are safe and contribute to a healthy environment.	before PPS1 paragraph 5 and PPS5 paragraph 7 clearly sets out the value of the historic environment as a key driver for delivering sustainable development and successful place-making. This should be explicitly recognised in the text.	community and will be central to addressing and reducing issues related to deprivation in order to improve education, employment and training opportunities, and reduce health inequalities. <u>The historic environment is central to the success of regeneration schemes in creating sustainable places with a distinct identity and sense of place, where people wish to live and work.</u>	
37 (40) Core Strate gy Object ive 10 Para 5.14	Lewisham's distinctive local character will be protected through sensitive and <u>appropriate</u> beneficial design, in particular those areas requiring managed change and protection such as the borough's <u>heritage assets and their settings</u> , conservation areas and listed buildings , <u>local rivers and landscape</u> , and yet at the same time creating and improving the environment within the key	It is noted that only some of the changes we suggested have been taken on board. We would advise that the following changes are made to ensure the Objective is fully compliant with PPS5. a. "...contributes to a sense of place and local distinctiveness, <u>informed by an understanding of historic context.</u> " b. "...alterations to existing	Clause (a) The Council agrees to this change. Clause (b) The Council does not wish to add the word 'historic' to this clause as it considers that this is implicit within the general expression of 'context'. It is considered that the historic context is now appropriately referred to by the other amendments made to this	Agree with the changes proposed and confirm our withdrawal of our comments to clause (b).

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
	<p>regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean:</p> <p>a. ensuring that new development achieves high standards of urban design and residential quality and contributes to a. sense of place and local distinctiveness</p> <p>b. ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment</p> <p>c. preserving or enhance the borough's conservation areas, listed buildings and the other identified elements of the historic environment including archaeological remains.</p>	<p>buildings are sensitive, appropriate to their <u>historic</u> context, and make..."</p> <p>c. preserving or enhancing <u>the condition and historic significance of the borough's heritage assets and their settings, conservation areas, listed buildings</u> and the other identified elements of the historic environment including archaeological remains.</p>	<p>objective. English Heritage have confirmed their agreement to the current wording and their objection has now been withdrawn.</p> <p>Clause (c) The Council agrees to this change.</p>	
39 (43) Section 6.1 and	6.3 The spatial strategy to guide development to 2026 within the London Borough of Lewisham is based on valuing the great things we have, but also recognising there is a	We note that reference has been made to the Core Strategy evidence base and the need to enhance and protect the local and historic character. However as expressed	Paragraph 6.3 Add the following additional wording to the end of paragraph 6.3: '...national policy and the London Plan <u>and reflects its character</u> '.	Agree with the changes proposed and the explicit reference to the historic environment.

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
6.2	<p>need for change in certain areas. It is about securing sustainable growth and development where it can be accommodated, while at the same time protecting and enhancing <u>local and historic character</u> and those areas of the borough where development should be carefully managed. This will ensure local residents benefit from change and the sensitive areas of the borough are protected. In doing so, a locally distinctive strategy for the borough is provided that reflects the parameters of national policy and the London Plan.</p> <p>6.4 The Lewisham Spatial Strategy focuses growth and larger scale development in the north of the borough on the localities of Lewisham, Catford, Deptford and New Cross/New Cross Gate. These are identified as Regeneration and Growth Areas. Benefitting from higher levels of public transport accessibility</p>	<p>earlier in this letter it is not clear how the Borough Wide Character Study has helped inform the review of the Core Strategy. Principally it is not clear how the Study findings have helped influence the management of growth expected to take place in the Borough and as expressed in the Spatial Strategy for Lewisham.</p>	<p>Paragraph 6.4 Add the following additional wording to the end of Para 6.4: '...focus of change and significant regeneration, <u>integrating and respecting important heritage assets.</u>'</p> <p>Paragraph 6.6 Amend Para 6.6 as follows: A managed approach to development will be adopted for other established residential neighbourhoods throughout the borough, including the protection of conservation areas <u>heritage assets.</u></p>	

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
	<p>and land that is available and deliverable, this strategy area will accommodate substantial new jobs, homes and supporting facilities and infrastructure. It will become a focus of change and significant regeneration.</p> <p>6.6 A managed approach to development will be adopted for other established residential neighbourhoods throughout the borough, including the protection of conservation areas.</p>			
40 (44) Spatial Policy 1	5. All new development will need to ensure the principles of good design are addressed, <u>heritage assets protected</u> , and incorporate high standards of sustainable design and construction, including maximising energy efficiency and the provision of on-site renewables <u>and low carbon decentralised energy are incorporated</u> .	Bullet point 5 - Welcome the reference to the protection of heritage assets as a key principle for new developments.	No response required.	No further comments to make.
59	Blackheath	Bullet point i) - Welcome the change	No response required.	No further comments to

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
(65) Spatial Policy 3	i. Ensure the preservation or enhancement of the village's historic character <u>and significance</u> , and that of the surrounding residential areas, through conservation area status.	proposed.		make.
70 (76) Spatial Policy 5	1a. Ensure that any new development protects or enhances the quality of Lewisham's character, <u>and historic significance</u> particularly within conservation areas.	Bullet point 1 a. – Welcome the change proposed.	No response required.	No further comments to make.
73 (79) Section 3C Para 6.161	These green areas are considered one of Lewisham's strongest assets and contribute to biodiversity <u>and heritage value</u> as well as providing opportunities for recreation and health.	Welcome the reference to the heritage value of open spaces.	No response required.	No further comments to make.
75 (81) Section 4C Para 6.176 (Para 6.179)	Conservation areas will be protected from inappropriate built development, and change that enhances residential character <u>historic significance and heritage value</u> will be considered acceptable.	Welcome the inclusion of historic significance and heritage value.	No response required.	No further comments to make.
85	Signpost and Evidence Base list for	Signpost and Evidence Base – It is	The Council does not object to adding	No further comments to

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
(93)	Cross Cutting Policies on 'Growing the Local Economy'.	noted that PPS5 has not been included. PPS5 paragraph 7 clearly recognises the importance of the historic environment as a key contributor to regeneration and successful place-making.	a reference to PPS5 in the Signpost and Evidence base section. However, as the evidence relates to the protection of existing industrial and business uses it is considered to be of limited relevance to this section of the Core Strategy.	make.
94 (105) Signposts and Evidence Base	Signposts and Evidence Base list for policies on climate change and environmental management.	Signpost and Evidence Base – It is noted that PPS5 has not been included. As advised above Policy HE1 makes reference to the historic environment and climate change, which should be signposted here.	Agree to include reference to PPS5.	Agree - no further comments to make.
103 – 104 (114 – 115) Policy justification and Signposts		Signpost and Evidence Base – Welcome the inclusion of PPS5, however the associated supporting text to Core Strategy Policy 12 does not make an explicit reference to the heritage value of open spaces. This is needed to help explain the inserted reference to 'protecting the character and amenity of open spaces' (ref part 2 a.), which can	Amend Clause 2a of Core Strategy Policy 12 (as amended) as follows: 'Protecting the character, <u>historic interest</u> and amenity of, and within, open spaces as well as the effects of development outside their boundaries.' Add new paragraph to Core Strategy Policy 12 'Policy justification' as	Agree change

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
and Eviden ce Base		only be assumed to relate to the heritage value of open spaces. This omission needs to be addressed.	follows: <u>The borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. These open spaces have historic significance, improve the quality of life and give the borough a distinct identity. This policy is therefore supported by PPS5 which aims to conserve heritage assets.</u>	
114 (126) Section 7.4.2 Para 7.160	PPS5 PPG15 and PPG16 <u>sets out the Government's planning policies in the conservation of the historic environment.</u>	The reference to PPG16 needs to be deleted.	Agree to delete the reference to PPG16. The deletion is already recommended in the Schedule of Proposed Amendments.	No further comments to make.
116 (129) Core Strate	The Council will ensure that the value and significance of the borough's heritage assets <u>and their settings</u> , which include conservation areas,	In general support the policy wording, subject to the following: Reference to the Maritime	Agree to make the following amendments and also remove inaccuracies:	Agree changes

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
gy Policy 16	<p>listed buildings and locally listed buildings and structures, archaeological remains, and historic parks and gardens <u>and other non designated assets such as locally listed buildings</u>, will continue to be monitored and conserved according to the requirements of government planning policy guidance, the London Plan policies and local policy.</p> <p><u>The Council will ensure that the borough's heritage assets will be valued as a positive asset and considered as central to the regeneration of the borough as detailed in the Core Strategy spatial policies. The Council has identified the World Heritage Site Buffer Zone for the Greenwich World Heritage Site on the Proposals Map (see also Core Strategy Policy 18) and will ensure the implementation of the World Heritage Site Master Plan.</u></p>	<p>Greenwich World Heritage Site should include the term 'Maritime'. The need to protect and enhance the Outstanding Universal Value, integrity and authenticity of the Maritime Greenwich World Heritage Site should be expressed in the policy.</p> <p>These changes will ensure the policy reflects Cir 07/09.</p>	<p>The Council will ensure that the value and significance of the borough's heritage assets and their settings, which include <u>the Maritime Greenwich World Heritage Site</u>, conservation areas, listed buildings and locally listed buildings and structures, archaeological remains, and <u>registered</u> historic parks and gardens, <u>locally listed buildings and structures</u> and other non designated assets, will continue to be monitored, <u>reviewed</u> and conserved according to the requirements of government planning policy guidance, the London Plan policies and local policy <u>and English Heritage best practice</u>.'</p> <p>The Council will ensure that the borough's heritage assets will be valued as a positive asset <u>positively</u> and considered as central to the regeneration of the borough as detailed in the Core Strategy spatial policies. The Council has identified</p>	

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para ¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
			The World Heritage Site buffer zone for the <u>Maritime Greenwich World Heritage Site</u> is identified on the Proposals Map (see also Core Strategy Policy 18). <u>The Council will ensure that its Outstanding Universal Value, integrity and authenticity will be protected and enhanced</u> and will ensure the implementation of the World Heritage Site Master Plan.	
161 (147) Strategic Site Allocations 6	2.f. Reinforce and enhance the Quaggy River corridor and Waterlink Way to add visual amenity and provide a buffer between the site and St Stephen's Conservation Area.	It is important to ensure that the significance of the areas heritage assets including their settings are explicitly identified, valued and used to inform future development. For example the current policy wording identifies St Stephen's Church (grade I listed building) and St Stephen's conservation area, but do not seek to use them as a basis in which to inform the design principles. This should be addressed.	Propose the following amendment to Clause 2f. as follows: Reinforce and enhance the Quaggy River corridor and Waterlink Way to add visual amenity and provide a buffer between the site <u>and respect the historic significance and setting of heritage assets such as the Grade II listed St Stephens Church and the adjacent conservation area.</u>	Agree changes
N/A	N/A	English Heritage comment in their letter of 21 December 2010 that the	The Council has this information available and is willing to attach this to	We welcome the inclusion of additional

Schedule 1 showing Areas where Agreement has been reached				
Page/ Para¹	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the changes in the Schedule of recommended amendments.	LB Lewisham response	EH response January 2011
		Lewisham Character Study lacks detail in respect of all the Conservation Areas in the borough in that only 11 are examined in detail.	the Character Study. It is expected that in the course of preparing further DPDs more detailed evidence base work will be undertaken.	<p>information on the Conservation Areas not identified in the Lewisham Character Study as supplementary to the evidence base.</p> <p>We also welcome the Council's commitment to undertake further detailed evidence base work in preparing further DPDs. We would, however, advise that this commitment is clearly set out in the Core Strategy especially in relation to developing the policy framework and proposals for areas of regeneration and growth, tall building proposals and management of the historic environment.</p>

SCHEDULE 2

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached					
Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
31 (34) Section 4.3 Paragraphs 4.7 – 4.19		It is not clear how the Borough Wide Character Study has helped inform the review of the Core Strategy Vision for Lewisham. The only changes that appear to have been made are in connection with the reference of the local and historic character being at the heart of new design. We would expect the Study to help provide further detail to the Vision and clarity of direction on how Lewisham can and will change in the future.	The Core Strategy vision is intended to be a short summary setting out in broad terms, the main regeneration outcomes for different areas of the Borough. It was not intended to reflect the detailed nature of the Character Study. The development of this further detail will take place in future Area Action Plans, and detailed policies in the Development Management Development Plan Document. The Council considers that the Vision is appropriate and does not require amendment.	The concern is that the historic environment is viewed as only a design issue, when it delivers many economic, social and environmental benefits. These aspects of the historic environment should be highlighted in the Vision for Lewisham.	Propose the inclusion of the following as the first sentence in Paragraph 4.8 ' <u>Across the borough, the social, cultural, economic and environmental benefits of its heritage assets will be used to facilitate and inform place making.</u> '

² Numbers in brackets indicate the page number in the Core Strategy tracked changed version (incorporating the changes shown in the Schedule of recommended amendments to the Core Strategy, October 2010)

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached					
Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
55 (61) Section 4C Paragraph 6.71 – 6.75 – 6.77)	Paragraph 6.75 Subject to the detailed considerations set out in Policy 18, <u>the</u> Lewisham and Catford town centres, and the Strategic Site Allocations in Deptford and New Cross, are in principle considered appropriate for the location of tall buildings <u>where they improve and add coherence to the skyline, and where their impact is judged to be acceptable, and of the highest design quality</u> , to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver.	We are concerned that the changes proposed are not sufficiently robust to protect the historic environment from inappropriate development such as tall buildings. For example paragraph 6.75 supports in principle the location of tall buildings in Lewisham and Catford town centres subject to a variety of concerns including 'where their impact is judged to be acceptable'. This phrase and the overall tone of the paragraph is unacceptable and insufficient in providing a robust framework in which to manage the appropriateness of tall buildings and their impact upon the historic environment in line with PPS1, PPS5 and EH/CABE Guidance on Tall Buildings	Propose the following amendments: Subject to the detailed considerations set out in Policy 18, the Lewisham and Catford town centres, and the Strategic Site Allocations in Deptford and New Cross, <u>are in principle may be</u> considered appropriate for the location of tall buildings where they improve and add coherence to the skyline, and where their impact is judged to be acceptable, and of the highest design quality, to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver.	We still seek further clarification of the wording to paragraph 6.75 so that the significance of heritage assets are appropriately protected from inappropriate development proposals. Suggest the following amendments so that the impact of tall buildings upon heritage assets is considered in line with PPS5 (2010) and EH/CABE Guidance on Tall Buildings (2007): 'Subject to the detailed considerations set out in Policy 18, the	LBL proposes an alternative wording to that suggested by English Heritage, because the current wording relates to the impact of the building on all features that could be potentially sensitive, which includes the significance of heritage assets. The alternative wording proposed is: - 'Subject to the detailed considerations set out in Policy 18, the Lewisham and Catford town centres, and the Strategic Site Allocations may be

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
		<p>(2007). We would advise that this paragraph is reworded so that the tall buildings may be considered as appropriate in Catford and Lewisham town centre, however further detailed analysis would need to be undertaken to ensure the impact of tall buildings is appropriately managed and that the significance of heritage assets are not harmed.</p>		<p>Lewisham and Catford town centres, and the Strategic Site Allocations may be considered appropriate for the location of tall buildings where they improve and add coherence to the skyline, and where their impact is judged to be acceptable and <u>where they do not cause harm to the significance of heritage assets</u>, and of the highest design quality, to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver.'</p>	<p>considered appropriate for the location of tall buildings where they <u>are of the highest design quality, improve and add coherence to the skyline, and do not cause harm to the surrounding environment, including the significance of heritage assets.'</u></p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
<p>91 – 92 (100 – 102) Core Strate gy Policy 8</p>	<p>Core Strategy Policy 8 Clause 5</p> <p><u>5. The Council supports and encourages the retrofitting of energy saving and other sustainable design measures in existing housing and other development particularly estate renewal.</u></p>	<p>It is important to recognise the need for a balanced approach between conserving the historic environment and the need to combat climate change through energy saving and sustainable design measures. PPS5 Policy HE1 clearly highlights this balanced approach which is not sufficiently reflected in the wording of this policy or the supporting text. This issue should be addressed so that it complies with PPS5.</p>	<p>Add the following text to the end of Clause 5:</p> <p>5. The Council supports and encourages the retrofitting of energy saving and other sustainable design measures in existing housing and other development particularly estate renewal <u>having considered any harm to the significance of heritage assets.</u></p>	<p>Agree with the proposed change to clause 5 of Policy 8 as a response to PPS5 Policy HE1. However we would seek further clarity and confirmation from the Council on how they will how this policy will be implemented in the historic environment, in line with PPS5. For example will the Council develop further policies or advice through other DPDs or SPDs? We would seek a commitment from the Council in the policy justification further clarity will be given.</p>	<p>Propose the inclusion of the following as an additional paragraph after paragraph 7.64 in the 'Policy Justification'.</p> <p><u>'Planning Policy Statement 5 - Planning for the Historic Environment (PPS5) Policy HE1 and associated English Heritage Guidance will be used to assess issues relating to heritage assets and climate change. The Council will also prepare more detailed local policy to address this issue in the forthcoming</u></p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached					
Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
					<u>Development Plan Documents. Guidance is also contained in the London Plan Sustainable Design and Construction Supplementary Planning Document.'</u>
114 (126) Core Strate gy Policy 15	<u>1.f. ensure any development protects or enhances the borough's conservation areas, listed buildings and heritage assets.</u> 3.c. New developments in Lewisham and Catford town centres should result in a radical upgrading of the social and physical	The current wording of the policy needs to be amended to reflect more closely PPS5. Part 1.f. (proposed as a new clause in the Schedule of Proposed Amendments) should be amended to the following: Ensure any development protects <u>and</u> or enhances the borough's <u>heritage assets, significance and their settings, such as</u> conservation areas, listed buildings, <u>Registered</u>	Agree to amend clause 1.f. as requested. Clause 3.c. Propose the following amended wording: New developments in Lewisham and Catford town centres should result in a radical upgrading of the social and physical environment, and in order to be successful will need to allow for tall buildings of the	Agree changes. We would, however, advise that additional amendment needs to be made that ensures the significance of heritage assets are not harmed. This should be explicitly expressed in the policy so that it complies with PPS5 and the EH/CABE Guidance on Tall	LBL proposes an amendment to the wording suggested by English Heritage in order to bring it into line with the wording proposed for Section 4C discussed above as follows: 'New developments in Lewisham and Catford town centres should result in a radical

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
	<p>environment, and, in order to be successful, will need to allow for tall buildings of the highest design quality where they improve and add coherence to the skyline and where their impact is judged to be acceptable.</p> <p>4.a. Sydenham, Forest Hill and Blackheath preserves or enhances the historic character <u>and significance</u>, and that of the surrounding residential areas within Conservation Area status.</p>	<p><u>Parks and Gardens, Scheduled Ancient Monuments and Maritime Greenwich World Heritage Site. heritage assets.</u></p> <p>Bullet point 3 – reference should be made to the EH/CABE Tall Buildings Guidance (2007) and its criteria evaluation. For example 3c. should be phrased so that tall buildings may be considered as appropriate in Catford and Lewisham town centre, subject to further detailed analysis to ensure their impact is managed and that the significance of heritage assets are not harmed.</p> <p>Bullet point 4.a. - Welcome the reference to the significance of the historic environment.</p>	<p>highest design quality <u>may be appropriate</u> where they improve and add coherence to the skyline and where their impact is judged to be acceptable.</p> <p>No further response required for Clause 4.a.</p>	<p>Buildings (2007). ‘New developments in Lewisham and Catford town centres should result in a radical upgrading of the social and physical environment, and tall buildings of the highest design quality may be appropriate where they improve and add coherence to the skyline and where their impact is judged to be acceptable <u>and where they do not cause harm to the significance of heritage assets.</u>’</p> <p>Clause 4 - Agree – no</p>	<p>upgrading of the social and physical environment, and tall buildings of the highest design quality may be appropriate where they improve and add coherence to the skyline, <u>and do not cause harm to the surrounding environment, including the significance of heritage assets.</u>’</p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
				further comment to make.	
117 (131) Core Strate gy Policy 18	1. Tall buildings will be directed to existing cluster of tall buildings and close to centres of good public transport such as the Lewisham and Catford Town centres. 2. Tall buildings elsewhere in the borough will be assessed as to whether their development meets the aims identified for the Core Strategy Spatial Policies, for their impact on the character of identified heritage and open space features, and	The policy requires further clarification with regards to locations where tall buildings may be appropriate, and inappropriate. At present the policy appears to direct tall buildings towards existing clusters and town centres such as Catford and Lewisham. With further clauses made to elsewhere in the Borough where tall buildings could go. This ambiguous approach undermines the purpose of the Strategy providing a robust framework in which to manage tall buildings. We would advise that the policy should be worded so that it is clear which locations	Propose the following amendments to clarify the outcomes of the Tall Buildings Study: 1. Tall buildings will be directed to existing cluster of tall buildings and close to centres of good public transport such as the Lewisham and Catford Town centres. <u>1. The Council has produced a methodology, set out in the Lewisham Tall Buildings Study, which will be used to assess all proposals for tall buildings. The study includes</u>	Agree with the proposed changes, however, there are concerns that Clause 1 is phrased as a statement of justification rather than a strategy for the management of tall buildings. We would, therefore, advise that Clause 1 and 2 are amended so that they provide a clear strategic approach to managing tall building proposals in line with PPS1, PPS5 and EH/CABE Guidance on	LBL agree with English Heritage's proposed change to Clause 1 . LBL do not agree with English Heritage's proposed change to Clause 2 and propose an alternative wording as follows: 2. <u>Tall buildings elsewhere in the borough will generally be considered inappropriate unless they meet the aims identified in the Core Strategy Spatial</u>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
	<p>for where they can regenerate the borough and attract further investment.</p> <p>3. The Council has identified several areas where the effect of tall buildings will require careful assessment in relation to potential harm to the identified qualities of the areas listed below. These areas are detailed in the Lewisham Tall Buildings Study:</p>	<p>in the Borough may be considered appropriate for tall buildings subject to further detailed analysis. For example the Borough's Tall Building Study (Final Version – September 2010) highlights 6 locations where tall building proposals could be supported. These being Catford and Lewisham Town Centres, Convoys Wharf , Oxestalls Road, Plough Way and Surrey Canal Triangle. It should be noted that some of these locations included designated heritage assets, such as Lewisham town centre which includes three conservation areas. As an example we would strongly advise that the policy wording should explicitly not</p>	<p><u>the assessment of specific locations including Lewisham and Catford town centres, Convoys Wharf, Oxestalls Road, Plough Way and Surrey Canal Triangle, and identified within them locations which were potentially appropriate or were sensitive to tall buildings, or where tall buildings were not appropriate. The framework for the assessment of tall buildings has been prepared in accordance with guidelines issued jointly by the Commission for Architecture and the Built Environment (CABE) and English Heritage.</u></p>	<p>Tall Buildings (2007)</p> <p>Clause 1 '<u>Tall buildings may be appropriate in specific locations identified by the Lewisham Tall Buildings Study. These locations are Lewisham and Catford town centres, Convoys Wharf, Oxestalls Road, Plough Way and Surrey Canal Triangle. Within these locations the Study identifies further details of areas which may be appropriate, inappropriate or sensitive to tall buildings. All tall</u></p>	<p><u>Policies, and satisfy the methodology set out in the Lewisham Tall Buildings Study and the CABE/English Heritage Guidance on Tall Buildings.</u></p> <p>LBL do not agree with English Heritage's proposed changes to Clause 3 and propose the following alternative wording: - '<u>Tall buildings will be considered inappropriate where they would cause unacceptable harm to the identified qualities and significance of the heritage assets and</u></p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
		<p>support tall building proposals that would harm the significance of all heritage assets. A simple way forward would be to exclude the conservation areas as locations potentially appropriate for tall buildings, whilst the remaining parts of the town centre are considered sensitive to tall building proposals and therefore may be supported subject to further detailed analysis. This subsequent analysis may conclude that no tall buildings are considered appropriate in the town centre or that only a few chosen locations are considered acceptable subject to detailed design criteria. This process of analysis and consideration of the appropriateness of tall buildings</p>	<p>2. Tall buildings elsewhere in the borough will be assessed as to whether their development meets the aims identified for the Core Strategy Spatial Policies <u>using the methodology outlined in the Tall Buildings Study</u>, for their impact on the character of identified heritage <u>assets</u> and open space features, and for where they can regenerate the borough and attract further investment.</p> <p>3. <u>Tall buildings will be considered inappropriate where they would</u> The Council has identified several areas where the effect of tall buildings will</p>	<p><u>building proposals should be accompanied by detailed urban design analysis to assess its impact upon the immediate and wider context.</u></p> <p>Clause 2 <u>'Beyond the specific locations identified by the Lewisham Tall Buildings Study tall buildings will be resisted.'</u></p> <p>The details of the methodology of the Lewisham Tall Buildings Study and the reference to the</p>	<p><u>landscape features listed below:</u></p> <p>LBL do not consider that it is necessary to refer to details of the methodology put forward in the Tall Buildings Study within the policy justification as it would repeat CABE/English Heritage guidance.</p> <p>In respect of Para 7.174 Policy Justification for Core Strategy Policy 18 LBL proposes the following wording: The World Heritage Site of Maritime</p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
		<p>should be expressed clearly in the policy. Areas outside of the 6 named areas should be explicitly recognised in the policy wording as inappropriate for tall buildings. This includes excluding the potential for tall buildings in the buffer zone to the Maritime Greenwich World Heritage Site. This approach should be clearly set out in the policy. At present the wording is not explicitly clear and therefore needs to be addressed so that it mirrors more closely national guidance and EH/CABE Guidance on Tall Buildings (2007).</p>	<p>require careful assessment in relation to potential cause unacceptable harm to the identified qualities of the heritage assets and landscape features listed below; the areas listed below. These areas are detailed in the Lewisham Tall Buildings Study:</p>	<p>EH/CABE Guidance on Tall Buildings (2007) should be made in the policy justification. We would also advise that the criteria based approach for the assessment of the suitability of tall buildings would be more appropriate in the development management DPD.</p> <p>Agree with the proposed changes to Clause 3 subject to the following minor amendment is made so that it reflects PPS5.</p> <p>Clause 3</p>	<p>Greenwich is also relevant to the location of tall buildings within the borough as sites along the river within Lewisham have been identified as being potentially sensitive to tall buildings in a document prepared by the World Heritage Site Coordinator. <u>The Maritime Greenwich World Heritage Site Buffer Zone will be considered inappropriate for the location of tall buildings.</u></p>

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
				<p>'Tall buildings will be considered inappropriate where they would cause unacceptable harm to the identified qualities and significance of the heritage assets and landscape features listed below; '</p> <p>For reasons of consistency, the policy justification paragraph 7.174 and its reference to the Maritime Greenwich WHS should be amended to reflect the policy wording. It should now state that tall buildings proposals are</p>	

Schedule 2 showing Areas where Agreement was not reached or where Partial agreement was reached

Page/ Para ²	Current wording (including amendments put forward in the Schedule of recommended amendments, October 2010)	English Heritage comment and/or suggested amendments to the Schedule of Recommended Amendments	LB Lewisham response	EH response January 2011	Subsequent LBL Response January 2011
				'inappropriate' and in the setting and buffer zone of the Maritime Greenwich WHS and not 'potentially sensitive'.	