



# LEWISHAM

TALL BUILDINGS STUDY  
DRAFT

LONDON BOROUGH OF LEWISHAM

Allies and Morrison Urban Practitioners  
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# 1 INTRODUCTION AND CONTEXT

## 1.1 INTRODUCTION, PURPOSE AND STRUCTURE OF THE STUDY

### Introduction, context and purpose

- 1.1.1** In response to requirements set out in the New Local Plan, the objective of the Lewisham Tall Buildings report is to provide a methodology for determining the appropriate scale and location of tall buildings within Lewisham by undertaking a process of analysis, policy examination and good practice as well as setting out guidance for future tall building development within the borough.
- 1.1.2** This report will build on the borough's 2010 Tall Buildings Study (updated in 2012), providing an updated methodology for determining appropriate locations for tall buildings supported by renewed analysis and updated national and regional policy guidance.
- 1.1.3** The report will act as an evidence base document to inform a policy approach to tall buildings in Lewisham's new Local Plan. The report is intended to support the New London Plan's good growth agenda and Lewisham Council's own growth agenda, prompted by an increasing population and further projected growth.
- 1.1.4** This study will help to inform a policy approach in the emerging Local Plan and act as an evidence base document to inform a character and 'place-based' approach to growth in the borough. In this context, the recently adopted Lewisham Characterisation Report is a particularly relevant document for this study. The Characterisation Study outlines a growth strategy for the Borough and tall buildings, appropriately located and designed to exceptionally high standards, may play a significant role in the implementation of this growth strategy.

### Structure of the study

- 1.1.5** This report first sets out the context of the study with regards to existing policy context for the study in Chapter 1, alongside existing guidance which will inform this report, including current definitions of a 'tall building' in London and Lewisham.
- 1.1.6** Chapter 2 sets out a definition for what should be considered tall by providing an analysis of building heights across the borough and establishing a prevailing heights plan by which to ascertain what would be considered a 'tall building' by the definition provided.
- 1.1.7** Chapter 3 provides a set of borough-wide analysis plans which identify physical aspects of the borough which will help to inform appropriate locations for tall buildings. It also sets out areas which are suitable for growth based on their connectivity or because of their identification as an area for future growth within the Lewisham Local Plan or London Plan.
- 1.1.8** Chapter 4 provides an analysis of the key physical and environmental constraints which will influence a site's sensitivity for a tall building, including heritage and conservation features, viewing corridors, building heights, tree cover and air and noise quality.

## 1.2 INTRODUCTION TO THE BOROUGH

- 1.2.1** The London Borough of Lewisham is located on the southern side of the River Thames. It stretches down to suburban South London taking in the centres of Deptford, Lewisham and Catford. The borough is bordered to the west by Southwark, to the east by Greenwich and to the south by Bromley.
- 1.2.2** The Lewisham Characterisation Study produced in March 2019 notes that the historical evolution of Lewisham Borough has led to a range of distinctive neighbourhoods served by a number of commercial centres, each with its own distinct character and community. The borough has a rich history that is protected by twenty-seven conservation areas.
- 1.2.3** Stark contrasts have evolved between the pre-industrial cores of Blackheath, Deptford and Lewisham in the north of the Borough, their mixed residential neighbourhoods surrounding them and the inter-war growth that characterises much of the south of the Borough. Other notable phases of development have included the development of post-war estates, Lewisham shopping centre and most recently the growth associated with the extension of the DLR to Lewisham town centre.
- 1.2.4** The north of the borough is covered by two Opportunity Areas and so growth here is anticipated to continue in the medium long term, with opportunities enhanced by TfL's proposed extension to the Bakerloo line. Increased housing numbers for Lewisham in the New Draft London Plan places pressure for growth across the whole of the borough. This study will help provide a framework to understand this growth at a local level and guide new development to respect local character and distinctiveness.

## 1.3 TALL BUILDING POLICY CONTEXT

- 1.3.1** The New London Plan under Policy D9 defines tall buildings as buildings that “are generally those that are *substantially* taller than their surroundings and cause a *significant* change to the skyline”. Following a recent amendment proposed by the Secretary of State, relating to the definition of a tall building, the New London Plan now advises that “Boroughs should define what is a ‘tall building’ for specific localities, the height of which will vary between and within different parts of London *but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.*”
- 1.3.2** Lewisham's Core Strategy Policy 18 (Policy justification 7.167), defines tall buildings as “buildings that are *significantly* taller than the predominant height of buildings in the surrounding area” and “buildings that have a *notable* impact on the skyline of the borough and/or buildings that are more than 25 metres high adjacent to River Thames or more than 30 metres high elsewhere in the borough,” echoing that of the New London Plan policy.
- 1.3.3** The London Plan and Lewisham's Local Plan definitions, although similar in meaning, differ in their choice of wording, as demonstrated below:
- London Plan: “*substantially* taller than their surroundings and cause a *significant* change to the skyline”;
- and the Local Plan: “*significantly* taller than the predominant height of buildings in the surrounding area” and “buildings that have a *notable* impact on the skyline”.
- Substantially and significantly can often mean the same thing, however, ‘substantial’ implies that something is larger in size, whereas significant implies that it holds more meaning or importance. With this in mind, it might be considered that Lewisham is more cautious in its approach to tall buildings, meaning that greater consideration will be given to proposals which are tall and may impact on the skyline.

**New London Plan Guidance (2019)**

- 1.3.4** The New London Plan Policy D8 is much more explicit than its predecessor in its guidance for tall buildings. The policy primarily provides guidance for local authorities in preparing their own tall buildings policy, and is broken down into ‘definition’, ‘locations’, ‘impacts’, and ‘public access’.
- 1.3.5** The policy invites local authorities to create a definition of a tall building ‘for specific localities’ suggesting that ‘the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey’ and should be ‘based on local context’ for inclusion in their local plan. It also asks local authorities to determine ‘if there are locations where tall buildings may be an appropriate form of development’ and that ‘any such locations and appropriate tall building heights should be identified on maps in Development Plans’ and ‘should only be developed in locations that are identified as suitable in Development Plans.’

- 1.3.6** The policy notes that development proposals should address a number of potential impacts which are listed and described under four headings - visual, functional, environmental - and cover the following:
  - visual impacts;
  - long-range, mid-range and immediate views of the building;
  - spatial hierarchy and role in legibility and wayfinding;
  - architectural quality and materials;
  - World Heritage Sites and other heritage assets;
  - River Thames and Thames Policy Area;
  - adverse reflected glare;
  - light pollution from internal and external lighting;
  - internal and external design, construction detailing; materials and emergency exit routes;
  - servicing, maintenance and management;
  - entrances, access routes, and ground floor uses;

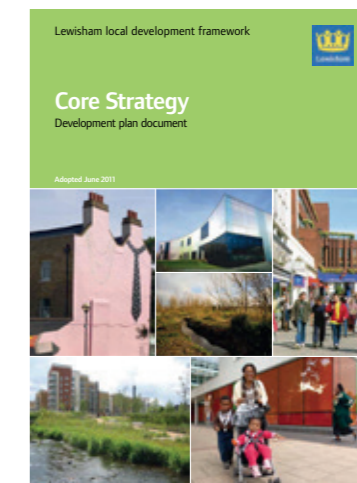
- capacity of the area and its transport network;
- jobs, services, facilities and economic activity;
- aviation, navigation, telecommunication and solar energy generation;
- wind, daylight, sunlight penetration and temperature conditions;
- air movement and dispersion of pollutants;
- noise;
- cumulative visual, functional and environmental impact.
- 1.3.7** In relation to public access, the London Plan states that “free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate” particularly on taller more prominent buildings which can offer views over London from the top.
- 1.3.8** The policy goes on to state the potential benefits of tall buildings in “facilitating regeneration opportunities and managing future growth” while noting that “high density does not need to imply high rise”. It also highlights their role as a navigation tool, the contribution of a well designed tall building to London’s cityscape and identity.

- 1.3.9** The policy provides further advice on the processes which will enable boroughs to identify locations for tall buildings by undertaking a sieving exercise. It goes on to provide advice on how to assess applications, and how a tall building should be designed well.

**Lewisham Core Strategy (2011)**

- 1.3.10** The Lewisham Core Strategy sets out the vision, objectives, spatial strategy and policies that will guide public and private sector investment to manage development and regeneration in the Borough until 2026.
- 1.3.11** Core Strategy Policy 18 discusses the location and design of tall buildings and says:
  1. 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 building proposals should be accompanied by detailed urban design analysis to assess its impact upon the immediate and wider context.
  2. Tall buildings will be considered inappropriate where they would cause harm to the identified qualities of the local character, heritage assets, landscape and open space features listed below:
    - a. World Heritage Site of Maritime Greenwich, the setting of the World Heritage Site, and the World Heritage Site Buffer Zone
    - b. London panoramas, protected vistas as defined in the London Plan and local views and landmarks
    - c. conservation areas and their settings
    - d. Metropolitan Open Land and other open spaces including London squares
    - e. historic parks and gardens
    - f. listed buildings and their settings
    - g. Sydenham Ridge Area of Special Character, which comprises a topographical feature where tall or bulky buildings would affect the skyline and have an adverse effect on the landscape and local residential amenity

- h. riverside environments where tall buildings might harm biodiversity interests through overshadowing
- i. existing residential environments and their amenity.
- 3. Tall buildings will need to be of the highest design quality. The silhouette, crown and bulk of the building will be important considerations, as will its contribution to an interesting skyline and its visual impact and interest at street level. In order to assess this the Council will use the guidelines issued jointly by CABI and English Heritage.(142)
- 4. Tall buildings close to the Thames will be assessed in consultation with the Port of London Authority, to gauge possible interference with navigational communications which operate on a line of sight basis.
- 5. Tall buildings will be assessed in relation to the flight path safeguarding for Biggin Hill and London City airports.
- 6. An assessment will be made on the potential developmental, overshadowing or micro-climatic problems at street level.

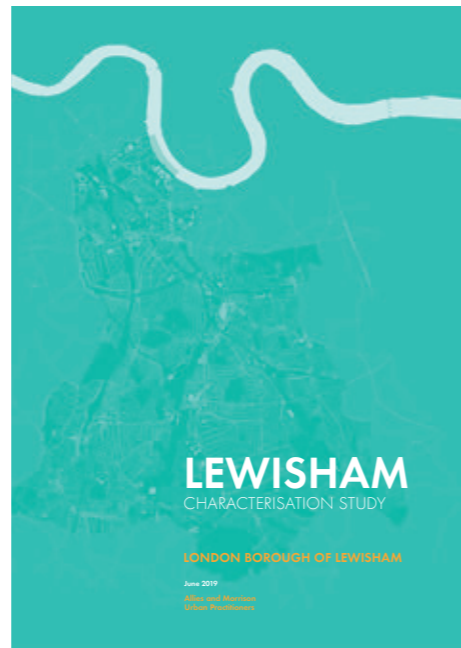


Lewisham Core Strategy (2011)

## 1.4 OTHER RELEVANT GUIDANCE

### Lewisham Characterisation Study (2019)

- 1.4.1** The role of the Lewisham Characterisation Study is to set out a description of the physical form of the borough, its history, places, streets and buildings. This analysis helps to provide an understanding of the particular attributes which make the borough of Lewisham what it is today, how its character varies across the borough and how this local distinctiveness might inform future approaches to managing growth and change. It is intended to support the Council's new Local Plan as an evidence base document, assisting with the preparation of neighbourhood plans, informing decisions made by Council officers, and used by developers and others investing in Lewisham to ensure proposals positively respond to the local context.
- 1.4.2** The first step was to identify the 21 neighbourhoods Lewisham's, which were then divided into five sub-areas by grouping similarities in character and sense of place informed by: discussions at community workshops; the mapping of physical assets such as topography, landscape and urban morphology; the historic evolution of each area; and analysis of land use and housing typologies; identification of five character based spatial themes and summary plans. Analysis of issues, opportunities and growth themes to inform a place-based approach to growth and change.
- 1.4.3** A summary framework plan was produced for each of the five sub-areas indicating constraints and opportunities and diagrams setting out a summary of the key character based spatial themes: 1) Strategic growth designations and major infrastructure investment, 2) A tailored approach to growth in the borough's centres, 3) The intensification of the borough's corridor, 4) Strengthening green and blue infrastructure, 5) Character based borough wide growth. Following public consultation, the study was endorsed by the Mayor, Cabinet and the Sustainable Development Select Committee (SDSC).



Lewisham Characterisation Study (June 2019)



Cornmill Gardens looking towards tall buildings along Loampit Vale

**Tall Buildings - Historic England Advice Note 4 (2015)**

**1.4.4** This note supersedes the 'Guidance on Tall Buildings' which was produced by English Heritage and CABA in 2007. It provides advice on the drafting of tall building policies and advice on the factors considered most relevant in the determination of relevant planning applications. The note states: "A successful application will have fully addressed a range of design criteria. Delivering architectural quality involves a consideration, amongst other things, of the building's:

- a. Scale
- b. Form and massing
- c. Proportion and silhouette
- d. Facing materials
- e. Detailed surface design
- f. Relationship to other structures
- g. Impact on streetscape and near views
- h. Impact on cityscape and distant views
- i. Impact on the skyline

**1.4.5** The report asserts that tall buildings need to set exemplary standards in design because of their scale, mass, wide impact and likely longevity. Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history (NPPF paragraphs 58 and 64). It is important that the required high standard of architectural quality is maintained throughout the process of procurement, detailed design, and construction, through the use of conditions and reserved matters. It is important that social and environmental effects are also assessed. Consideration needs to be given to its contribution to public space and facilities internally and externally, including the provision of a mix of uses, as part of a well-designed public realm. Consideration of the impact on the local environment is also important, including micro-climate, overshadowing, night-time appearance, light pollution, vehicle movements the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience. Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape.

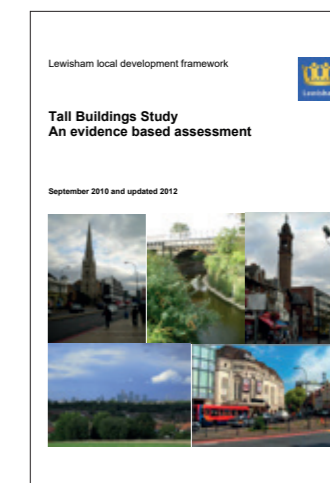


Tall Buildings - Historic England Advice Note 4 (2015)

**Lewisham Tall Buildings Study (2010)**

- 1.4.6** This study is one of the evidence based documents prepared in order to support the policy on tall buildings in the Lewisham Core Strategy.
- 1.4.7** The document analyses strategic sites in terms of constraints and opportunities for tall buildings, in relation to a set of valued elements of the natural and built environment, including:
  - Relationship with open space and the river network
  - Urban Character and Topography
  - Strategic and Local views
  - Aircraft Navigation and Telecommunications
  - Public Transport Accessibility Level and Pedestrian Facilities
- 1.4.8** The TBS confirms that tall building proposals would need to seek to achieve a positive relationship with identified heritage assets in the centre which play a key role in establishing the urban character and a sense of place to the town centre.

- 1.4.9** The TBS highlights the main areas of sensitivity which include:
  - south of the centre
  - the centre
  - Lewisham Gateway Strategic Site
  - Lewisham Town Centre - tall buildings should provide new amenity space.
  - Lewisham High Street - Care should be taken when designing tall buildings to create a positive relationship with the existing skyline and landmark buildings.
  - the amenity aspect of the pedestrianised high street and market area should be enhanced and not compromised when locating tall buildings
  - Rivers Ravensbourne and Quaggy
  - The World Heritage Site Buffer Zone



Tall Buildings Study - An evidence based assessment (September 2010 and updated 2012)

## 2 DEFINING WHAT IS TALL

### 2.1 LEWISHAM BOROUGH DEFINITION FOR TALL BUILDINGS

- 2.1.1** The preceding sections of this report help to determine locations where tall buildings may be an appropriate form of development subject to meeting other requirements of the Development Plan. This is a requirement of Part A of New London Plan Policy D8.
- 2.1.2** However, under Part B of Policy D8, Local Plans should also define what is considered a tall building for specific localities. Lewisham Council supports the New London Plan's general definition of tall buildings as those over 25m in height in the Thames Policy Area, and over 30m in height elsewhere. This definition will apply in areas where the Council consider tall buildings as potentially an appropriate form of development.
- 2.1.3** In an area characterised by buildings of 2 storeys, buildings of 3 storeys may not be considered substantially tall, but buildings of 4 storeys and above would be considered taller in the local context.
- 2.1.4** Judgements on this definition of taller buildings will therefore need to be made on a case-by-case basis although analysis of existing and known proposed building heights have resulted in the production of a 'prevailing' buildings heights plan. This should be used as a guide to help inform what local prevailing building heights are.
- 2.1.5** Where this definition is applied to a building being assessed as part of a planning application, consideration should be given to the suitability and sensitivities plans within this document, and importantly, the building's design quality.

### 2.2 LEWISHAM BOROUGH DEFINITION FOR TALLER BUILDINGS

- 2.2.1** The New London Plan also states that "Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline". In tandem with the quantitative formal definition, this supplementary qualitative definition is particularly relevant for those areas of the borough beyond those identified as potentially appropriate for tall buildings.
- 2.2.2** As the analysis presented above demonstrates, much of the borough is characterised by relatively low-rise buildings with very little variation in building heights. Therefore, proposals for buildings could come forward in these areas which would not fall under the formal definition of tall buildings, i.e. that are less than 30m tall, but which would be substantially taller than their surroundings and would cause a significant change to the skyline.
- 2.2.3** This gives rise to the need for a definition of buildings that might not be officially tall but are significantly taller than those that surround them, i.e. a Lewisham definition for 'taller buildings'. In order to ensure this definition responds to local circumstances it will need to relate to prevailing building heights across the borough.
- 2.2.4** Buildings that are over 50% taller than the buildings around them, the local prevailing height, are considered, in the Lewisham context, to be substantially taller than their surroundings. However, as noted in para 1.3.1 above, the recent Secretary of State amendment to the London Plan confirms that not building less than 6 storeys or 18m in height can be defined as tall. Some examples of what this means are as follows;
- 2.2.5** In an area characterised by buildings of 4 storeys, buildings of 6 storeys may not be considered substantially tall, but buildings of 7 storeys and above would be considered tall in the local context by virtue of the significantly different height difference between prevailing heights and that 7 storeys exceed the London Plan's 6 storey minimum threshold for tall buildings.



### 2.3 BUILDING HEIGHTS

2.2.6 Judgements on this definition of taller buildings will therefore need to be made on a case-by-case basis although analysis of existing and known proposed building heights have resulted in the production of a 'prevailing' buildings heights plan. This should be used as a guide to help inform what local prevailing building heights are.

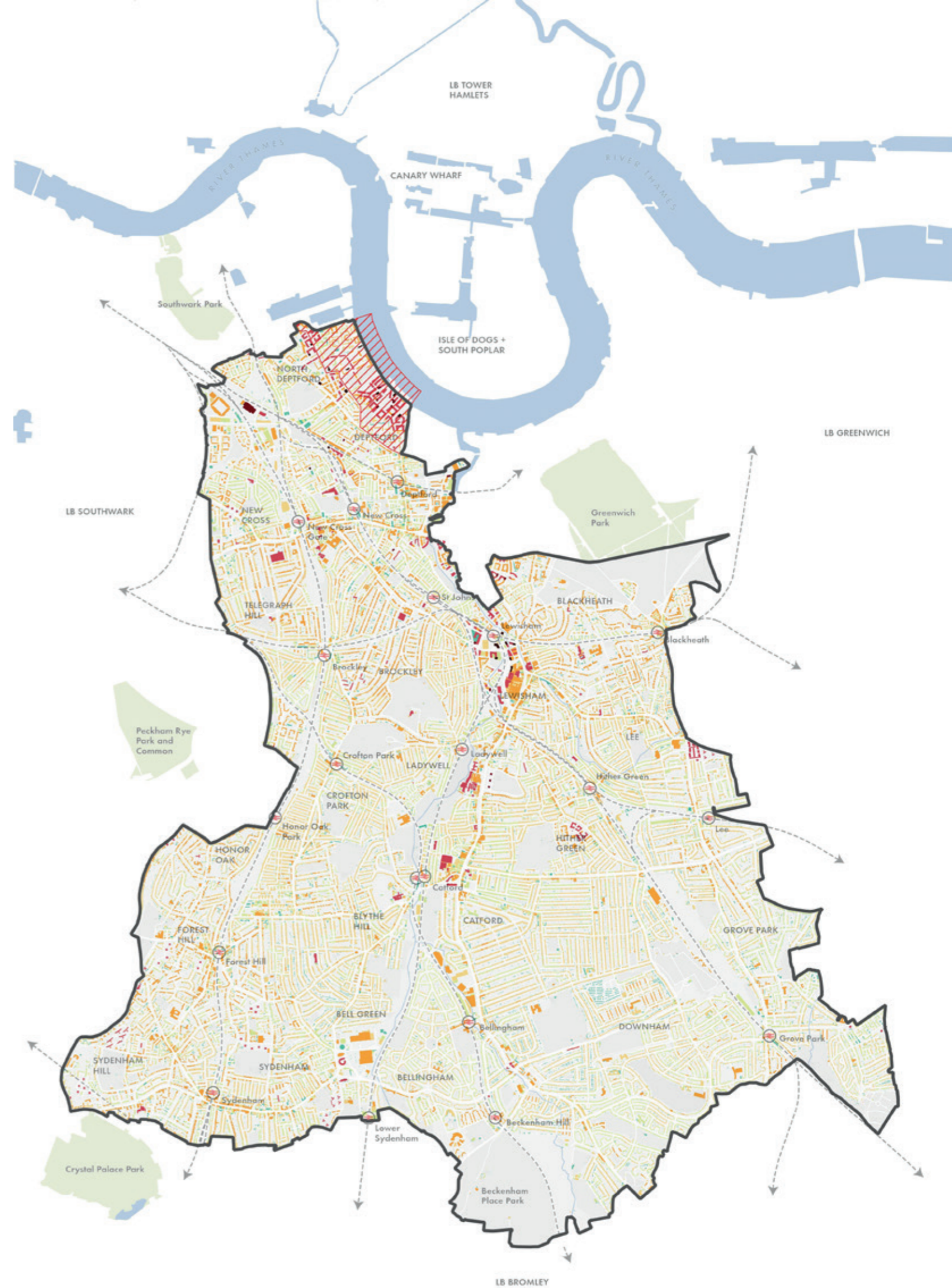
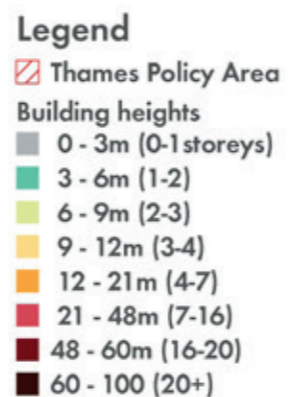
2.2.7 Where this definition is applied to a building being assessed as part of a planning application, consideration should be given to the suitability and sensitivities plans within this document, and importantly, the building's design quality.

2.3.1 This plan shows existing and proposed building heights across the Borough.

2.3.2 The plan includes proposed building height data from know major development proposals, although it should be noted that not all of this data has, as yet, been made available.

2.3.3 The plan will continually change and updated plans will need to be provided.

2.3.4 Number of storeys is given as an estimate and is not a record of an actual storey count assessment.



2.4 EXISTING AND PROPOSED TALL BUILDINGS

2.4.1 Taking forward the London Plan definition of tall which is 30m or 25m within the Thames Policy Area, this plan shows existing and consented proposed tall buildings across the Borough.

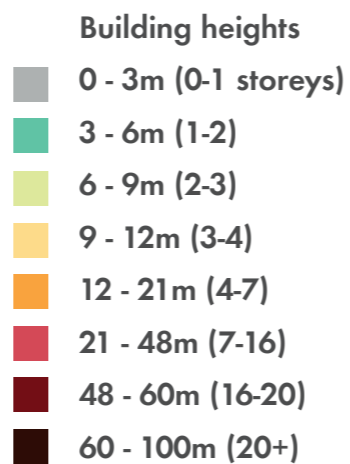
2.4.2 Note that as data on consented schemes accrue,, updates to this plan will be required.



### 2.5 AVERAGE BUILDING HEIGHTS BY AREA

- 2.5.1 The Lewisham Characterisation Study defined five areas of the Borough within and for which guidance was provided.
- 2.5.2 Through analysis of buildings heights within each of these five areas provides, average building heights within each of these five areas can be provided.
- 2.5.3 This is one, relatively coarse given the large size of the sub-areas, way of defining prevailing building heights.
- 2.5.4 A finer grain analysis is considered necessary to help define prevailing building heights across the Borough, as set out in 2.6 below.

Sub-area name  
 Mean heights (metres)  
 (Range in metres)

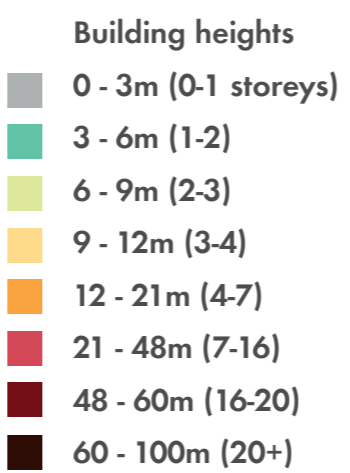


### 2.6 AVERAGE BUILDING HEIGHTS BY NEIGHBOURHOOD

2.6.1 In this plan, average building heights are provided for the characters areas as defined in the Lewisham Characterisation Study.

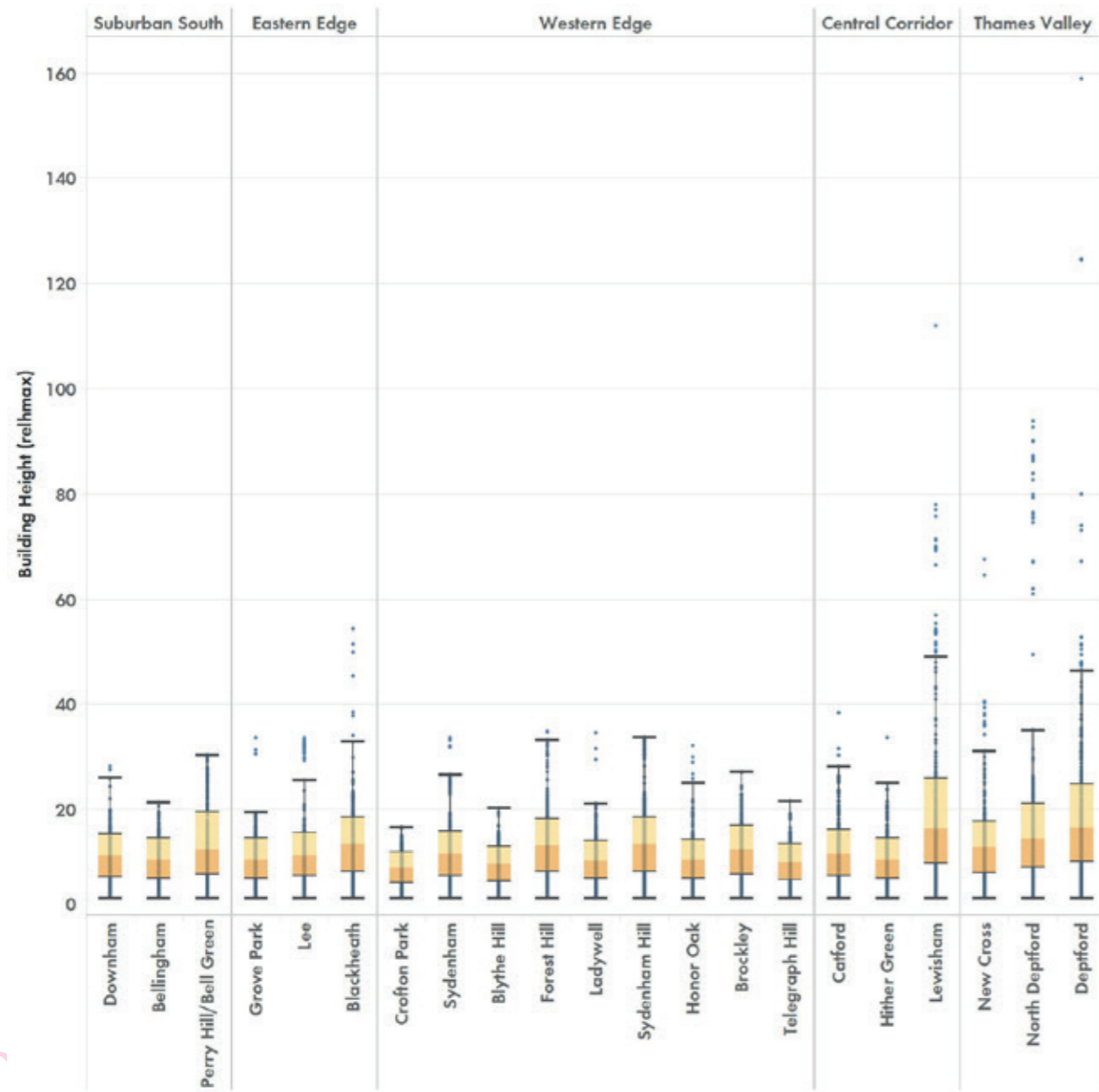
2.6.2 This is considered to form the basis of a useful assessment of prevailing building heights. Further analysis of this data is outlined below.

Mean heights (metres)  
(Range in metres)



### 2.7 AVERAGE BUILDING HEIGHTS AREA ANALYSIS

- 2.7.1 This Box Plot diagram provides an overview of the average building heights across each of the character areas from the Lewisham Characterisation Study.
- 2.7.2 The character areas are presented in average building height order, with the area with the highest average building height first.

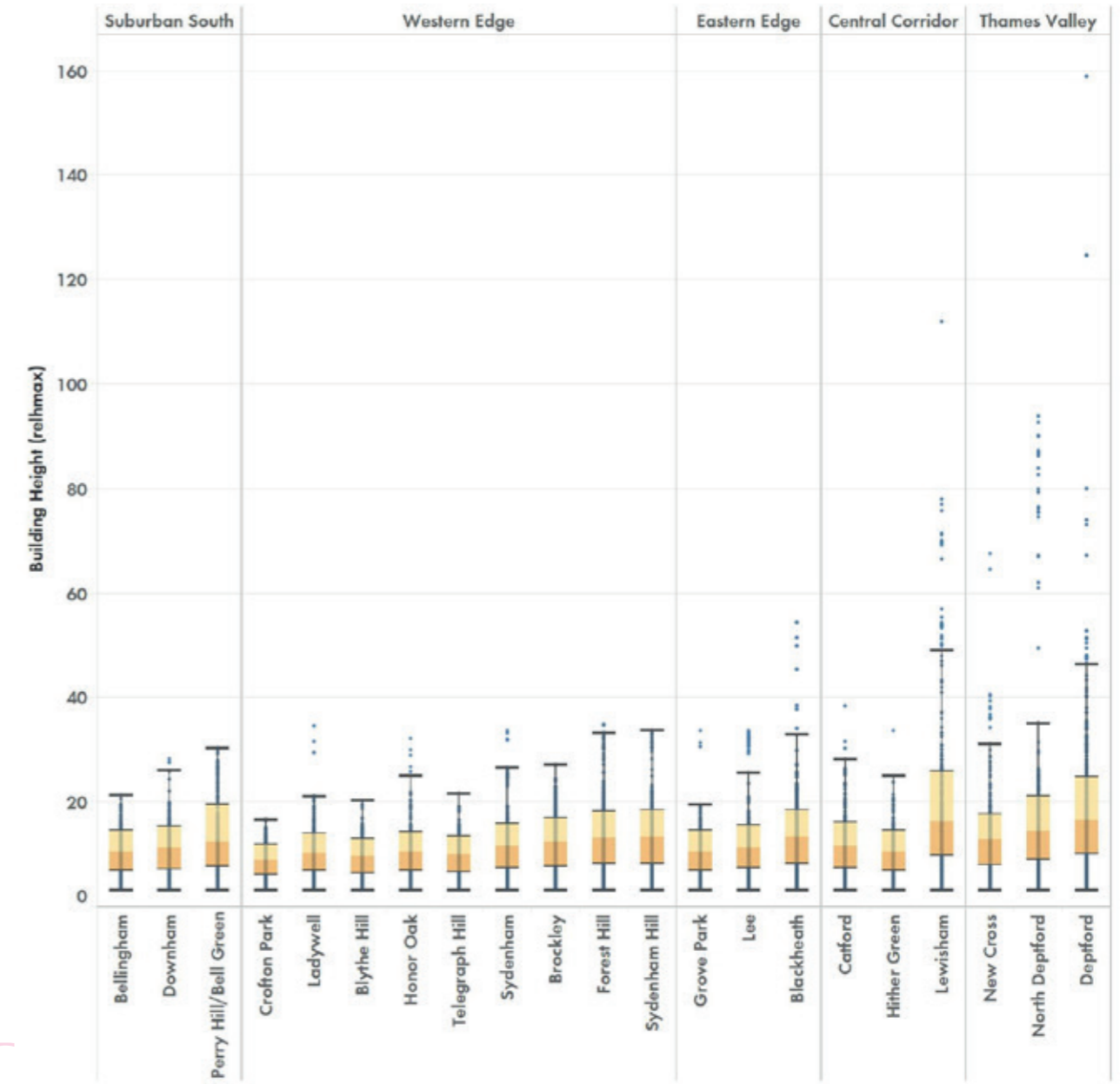


### 2.8 BUILDING HEIGHT VARIANCE

- 2.8.1 This Box Plot diagram using the same data, but presents the data based on the degree of variance of building heights within each character area.
- 2.8.2 This data was used, under Section 4.7 below, to assess the extent to which any given area was characterised by consistent building heights and may

therefore be more sensitive to the potentially negative impacts of tall buildings..

2.8.3 This in turn was used as one of a number of criteria in assessing the suitability of tall buildings as an appropriate development form in different locations across the borough.

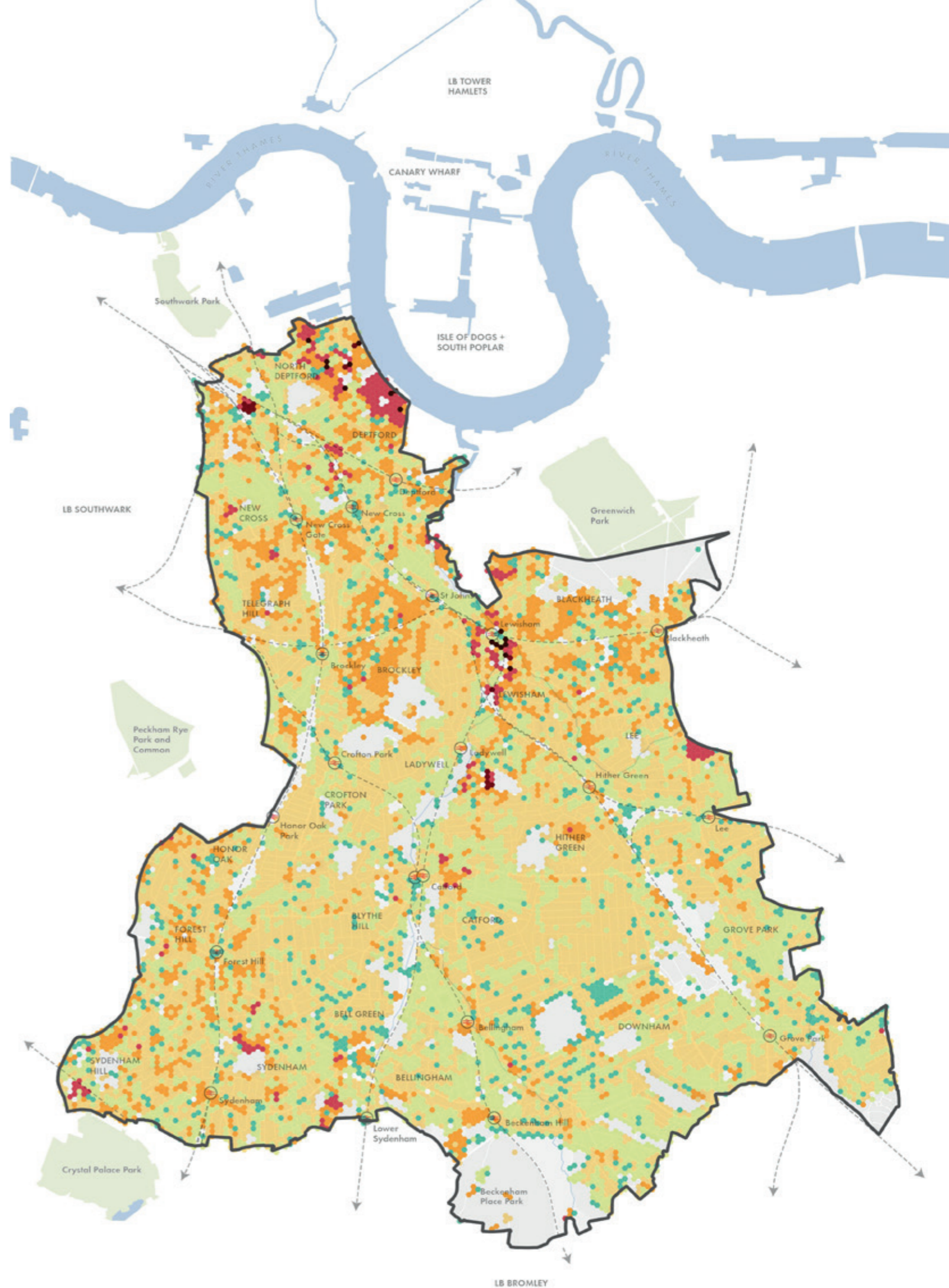
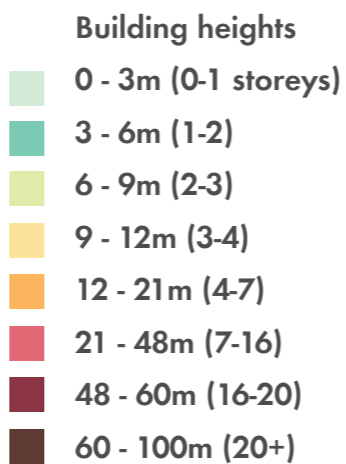


### 2.9 PREVAILING HEIGHTS

- 2.9.1 This plan has been prepared to help provide an overview of prevailing building heights across the Borough.
- 2.9.2 It should be used as guide to assessing the prevailing building heights of any site as development proposals come forward.
- 2.9.3 In turn, it can be used to help determine what might be considered a 'taller' building in any given location.
- 2.9.4 However, this assessment, and evidence to support it, should be undertaken as required and should form part of the support information in any relevant planning application.

### 2.10 WHAT IS TALL

- 2.10.1 Under Policy D9 and based on local context, the London Plan requires Development Plans to define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.
- 2.10.2 The Policy also confirms that a building cannot be considered tall if it is less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 2.10.3 To take account of local context and character, a tall building in Lewisham will be considered to be a building which is more than 50% taller than the prevailing height of the buildings in the immediate area.
- 2.10.4 The definition of what constitutes the appropriate area for which prevailing heights are assessed for any given proposal will be considered on its merits and on a case by case basis. However, as a starting point, the prevailing heights of the character areas defined in the Lewisham Characterisation Study as outlined in 2.6 and 2.7 above provide a useful starting point for this assessment.
- 2.10.5 A finer grain assessment of prevailing building heights is outlined in the adjacent plan which may also be useful in establishing prevailing building heights in different locations.



### 3 SUITABILITY ASSESSMENT

#### 3.1 INTRODUCTION

**3.1.1** This section provides a layered analysis of the relative suitability for tall buildings of locations across the Borough. This analysis is undertaken through an assessment under three headings as follows:

- Accessibility to public transport;
- Proximity to a service centre; and,
- Distribution of existing clusters of tall buildings.

**3.1.2** Each attribute has been given a relative weighting. This weighting is derived from professional judgment following workshop discussions between the consultant team and Council officers.

**3.1.3** The application of relative weightings are non technical in nature and in no way presented as formal measurements. However, they are considered to presented a balanced judgement on the relative importance of issues affecting an areas suitability for tall buildings.

**3.1.4** The data on the following pages presents an overview summary and description of the all the suitability criteria and their respective weighting.

**3.1.5** Some of the suitability criteria used to determine suitable locations for tall buildings, such as growth areas, has been informed by outcomes from the council's 2019 Borough-wide Characterisation Study. The objective of incorporating the outcomes of this study is to help provide character-led growth in the Borough.

**3.1.6** Whilst this section discusses the criteria which make an area more suitable for tall buildings, it is also important to consider any sensitivities which exist which could impact its suitability. Section 4 of this report therefore provides a layered analysis of criteria which would make an area more sensitive

to tall buildings. It is important to note that, while some areas may be identified as more suitable for tall buildings in this section of the study, these locations may also be identified as being more sensitive to the potentially negative impacts of tall buildings.

**3.1.7** It should also be noted that, while an area may appear suitable for tall buildings with regard to one attribute, it is the culmination of multiple attributes which would enhance its suitability for tall buildings.

### 3.2 ASSESSMENT OF SUITABILITY

#### PTAL

3.2.1 Accessibility to public transport services is one of the most important factors in determining a site's relative suitability for a tall building. This is underpinned by the requirement set out in the NPPF to make the optimum use of land, especially where there is an existing shortage of land for meeting identified needs, as there is across the capital. High density development is encouraged in areas well served by public transport (NPPF para 123). The assessment here is that areas with a PTAL rating of 5 or more are considered to be areas most suited to potential tall buildings.

#### Bakerloo line extension

3.2.2 The Council support the extension of the Bakerloo Line extension to improve transport connections in southeast London which will help to enable growth in homes and jobs. An extension of the line to Lewisham via the Old Kent Road and New Cross Gate has been chosen by TfL as the best option to achieve those goals. Running the extension beyond Lewisham to Hayes is also supported by the Council and was one of the matters put forward in TfL's 2019 BLE consultation. Whilst the Bakerloo Line extension is only a potential improvement in public transport accessibility, the Draft New London Plan calls for Boroughs to make the best use of land by making the most efficient use of the existing and future public transport.

3.2.3 We have mapped the areas within an approximate 12 minute walk from stations that will form part of the potential Bakerloo Line extension and consider the potential improvement in public transport accessibility to help make locations significantly more suitable for tall buildings.

#### Town centres

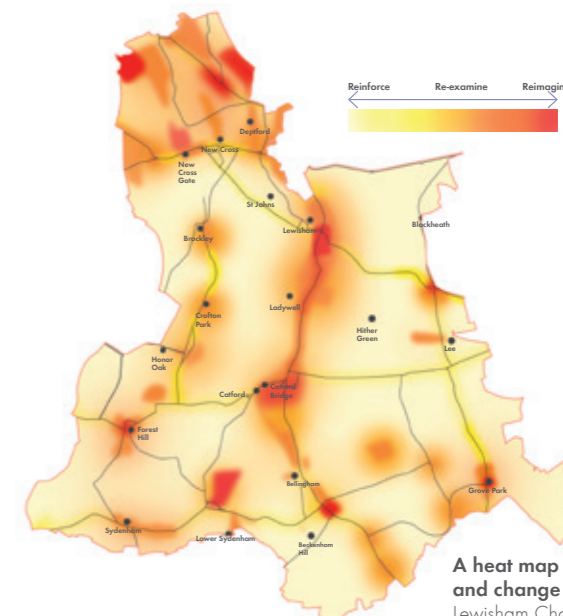
3.2.4 In addition to public transport accessibility, the NPPF also recognises the importance of commercial and shopping centres as locations best suited to making the optimum use of land. Lewisham Borough has a network of major and district centres. The larger the centre the greater range of shops and services provided. This makes them amongst the most sustainable locations in the Borough for higher density development and therefore the most suitable for tall buildings.

3.2.5 The maps take the adopted major and district centre boundaries and attribute them a relative weighting with the largest (Major) centres of Lewisham and Catford getting the highest weighting and district centres a lower rating. Local centres are excluded.

#### Opportunity Area

3.2.6 Opportunity Areas are identified by the London Mayor as significant regional locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. They are therefore locations considered suitable for significant and strategic housing growth. These factors have informed the view that Opportunity Areas should be considered more suitable for tall buildings. There are two Opportunity Areas within Lewisham Borough – (i) The Lewisham, Catford and New Cross Opportunity Area, and the (ii) The Deptford Creek/Greenwich Riverside Opportunity Area.

3.2.7 They are fairly expansive in size and area coverage and because of this have been given a low weighting.



A heat map of growth and change (taken from the Lewisham Characterisation Study (2019))

#### Growth Areas

3.2.8 The Lewisham Characterisation Study undertaken in 2019 undertook a range of character analysis in order to determine a 'place-based' approach to managing growth. The result was a 'heat map' of growth and change which indicated on a scale whether the character of areas needed to be reinforced, re-examined, or reimaged. The heat map indicates that those areas which are indicated as needing 'reimagined' are more suitable for growth. Redder tones on the plan illustrate specific opportunities for reimagining or "re-finding" the character of a place through new development. These occur mostly in town centres with major infrastructure improvement projects or in locations with significant sites highlighted for potential redevelopment such as big box retail locations. Opportunities to re-examine the existing character are shown by the orange and bright yellow tones which include opportunities along the borough's corridors, within town centres where there are available sites and where there are opportunities for urban regeneration of areas to re-knit with the surrounding character. The areas on the plan which are indicated as requiring 're-examing' or 'reimagining' are considered to be more suitable for change, growth and intensification, and are therefore considered potentially more suitable for tall buildings.

#### Tall building clusters

3.2.9 Where tall buildings already exist in a significant cluster, and where it is considered that these tall buildings are successful as sustainable development and do not negatively impact on the surrounding area and townscape, it is believed that the impact on the local townscape and skyline will be lessened with the addition of other tall buildings, therefore making these locations more suitable for tall buildings. However, this is purely a townscape consideration and is therefore considered to carry less weight than the more technical criteria of PTAL and major centres.

#### ACCESSIBILITY

##### weighting

High PTAL



12 minute walk from a Bakerloo Line station



#### LOCATION

Major town centre



District town centre



Opportunity area



Growth area



#### HEIGHTS

Existing cluster of tall buildings

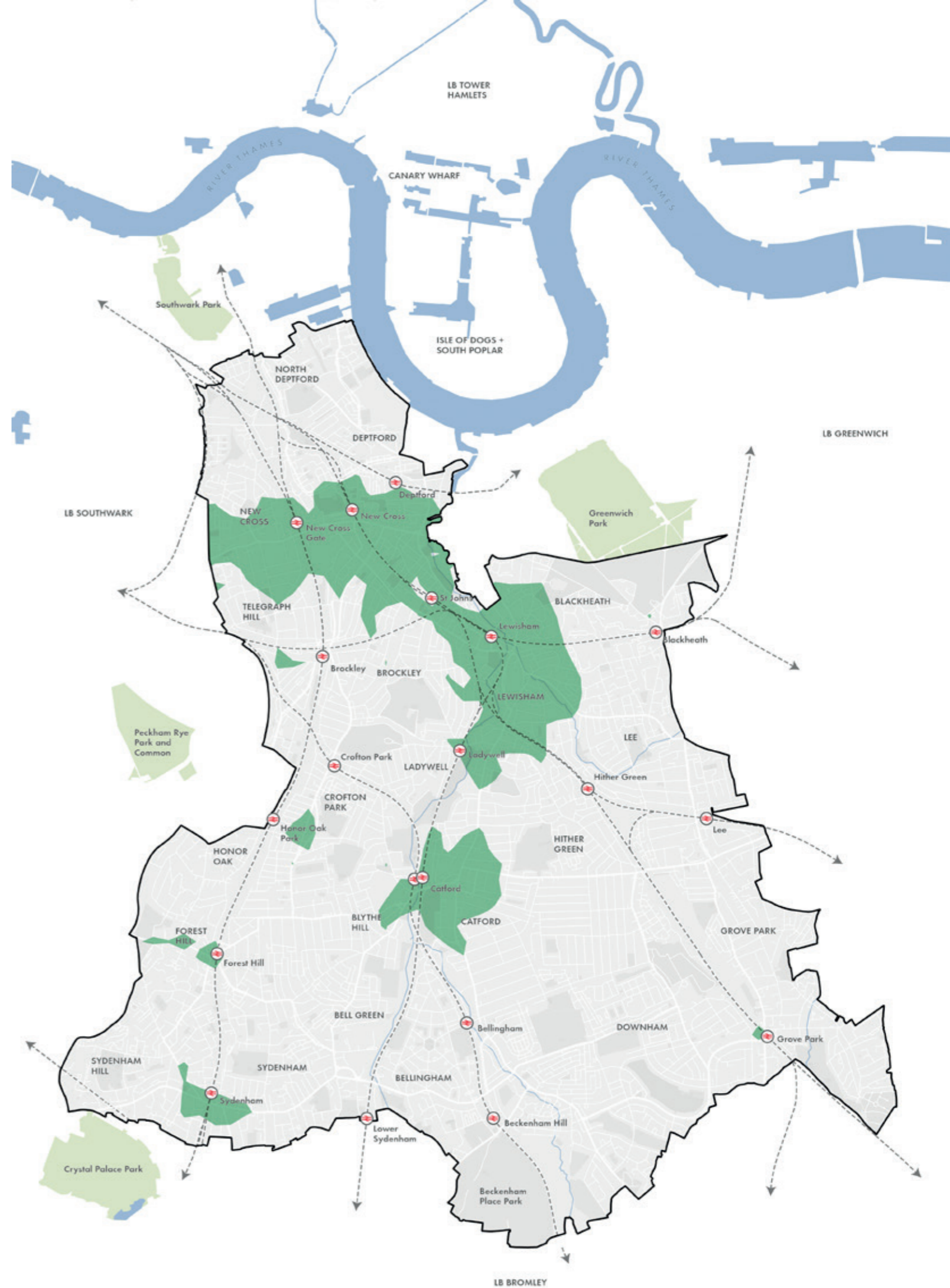
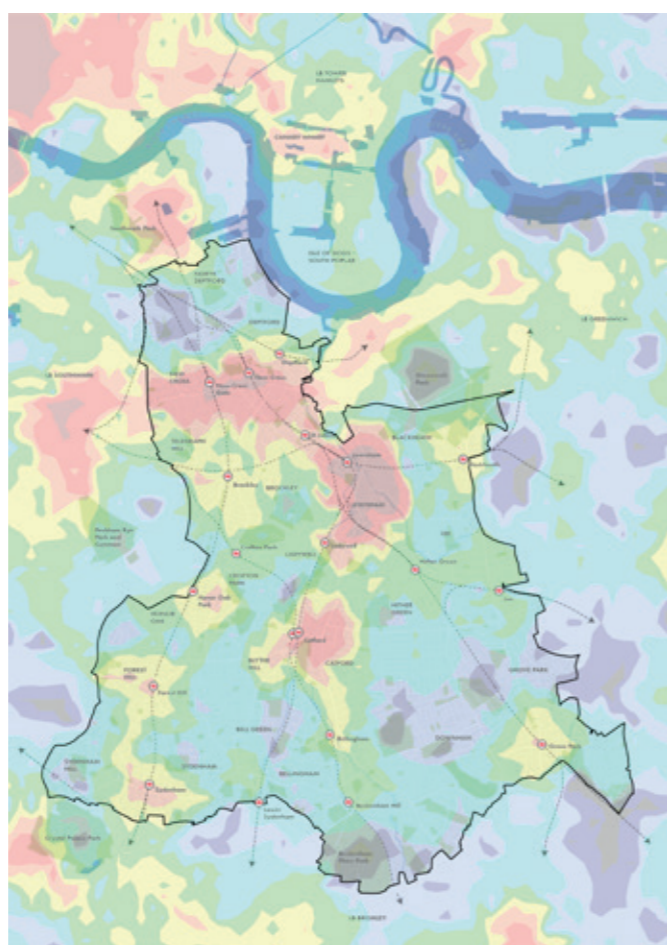




### 3.3 HIGH PTAL

- 3.3.1 Areas with a high PTAL of 5 and over are shown in oranges and reds on the adjacent plan and have been translated into the suitability plan as areas shaded in green.
- 3.3.2 High levels of PTAL area considered to be particularly appropriate when considering the locations most suitable for higher density development including tall buildings.
- 3.3.3 Large parts of the north of the borough, particularly around rail stations, are considered to have enhanced suitability for tall buildings. This includes areas around New Cross Gate, New Cross, South Deptford, large areas of Lewisham and parts of Ladywell.
- 3.3.4 Other areas which have increased suitability based on a high PTAL rating including large parts of Catford, and an area around Sydenham rail station.

High suitability rating



### 3.4 BAKERLOO LINE EXTENSION

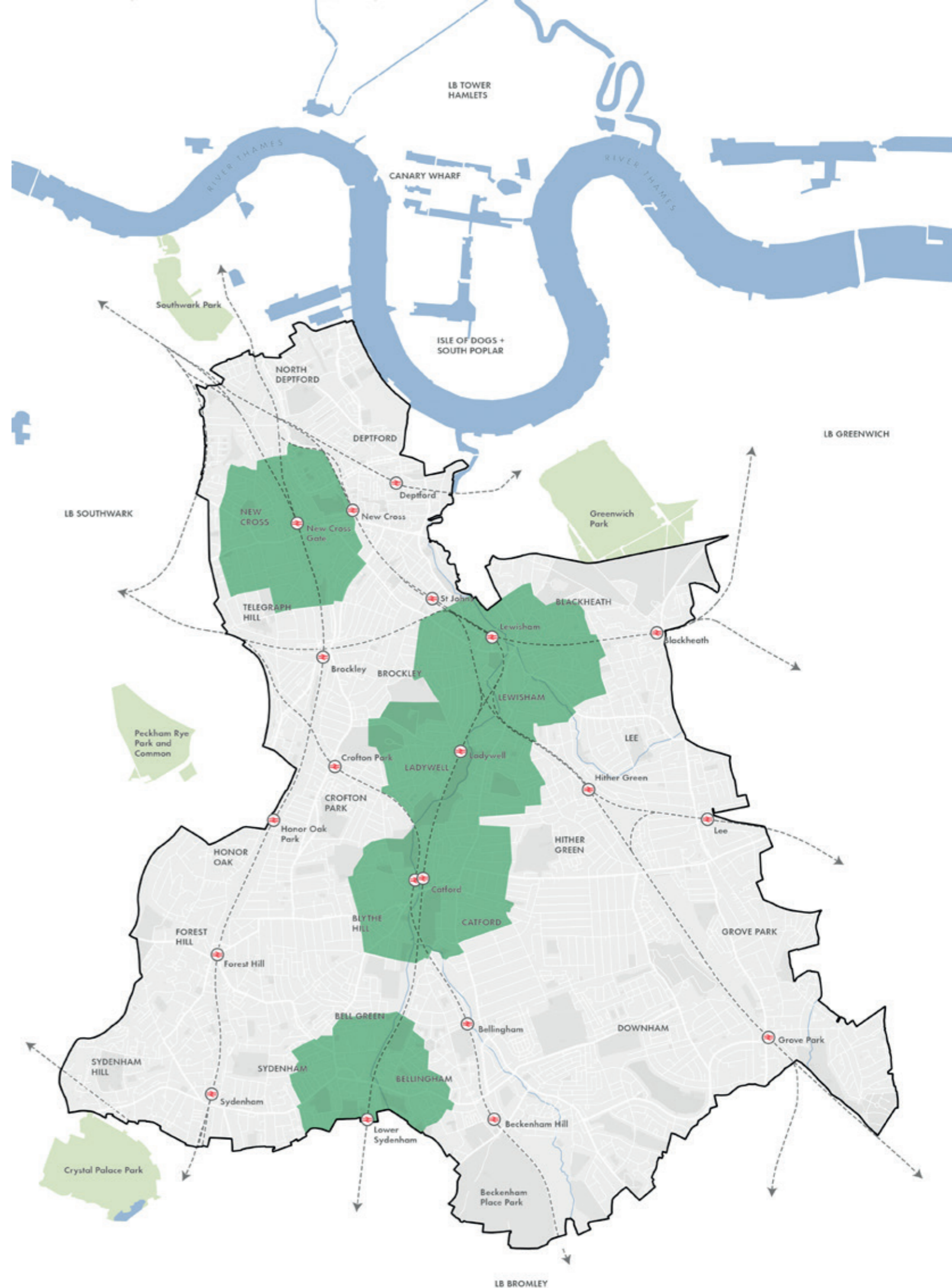
3.4.1 The Bakerloo Line Extension will result in the following stations in the London Borough of Lewisham being serviced by the Bakerloo Line, providing increased accessibility to these areas:

- New Cross Gate
- Lewisham
- Ladywell
- Catford
- Lower Sydenham

3.4.2 In addition, the case for a completely new station stop at Bell Green through the comprehensive redevelopment of the Bell Green retail park is also currently being considered. As no formal decision has yet been made on that proposal, this potentially completely new station is not included on the adjacent map.

3.4.3 The suitability plan adjacent shows a 12 minute walking radius around each of these new stations shaded in green, demonstrating their increased accessibility and suitability for the sustainable development of tall buildings. These isochrones have been calculated by Hatch Regeneris as part of the Bakerloo Line Extension impact assessment study.

High suitability rating



### 3.5 TOWN CENTRES



3.5.1 Lewisham currently has two major town centres which are considered to be more suitable for the sustainable development of tall buildings:

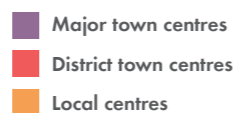
- Lewisham
- Catford

3.5.2 Lewisham currently has eight district town centres:

- Blackheath
- Deptford
- Downham
- Forest Hill
- Lee Green
- New Cross
- New Cross Gate
- Sydenham.

3.5.3 Both major and district town centres, shaded in green on the plan on the opposite page, are considered to be more suitable to accommodating tall buildings in light of the good range of, and proximity to, shops and services that they provide for residents. Major centres, shown on the plan on the opposite page, are better serviced (more sustainable) than district centres and are therefore more heavily weighted and shaded a darker green to indicate their increased suitability for tall buildings.

3.5.4 Note that Local Centres have not been included in the suitability assessment for tall buildings, shown on the page opposite, given the limited and purely local role they play.



### 3.6 OPPORTUNITY AREAS

3.6.1 The New London Plan indicates that there are two Opportunity Areas in Lewisham: (i) The Lewisham, Catford and New Cross Opportunity Area, and the (ii) The Deptford Creek/Greenwich Riverside Opportunity Area.

3.6.2 The Borough benefits from two 'proposed' Opportunity Areas in the London Plan. The Deptford Creek/ Greenwich Riverside OA covering a total area of 165 Ha falls partly across the north-east of the Borough and within which there is considered to be capacity for approximately 4,000 new jobs and 5,000 new homes. The Lewisham, Catford and New Cross OA is geographically much larger (815 Ha) and falls entirely within the Borough. The New London Plan indicates that there is development capacity of approximately 6,000 new jobs and 8,000 new homes within this area which extends across the north of the Borough and down the Lewisham High Street axis to Catford.

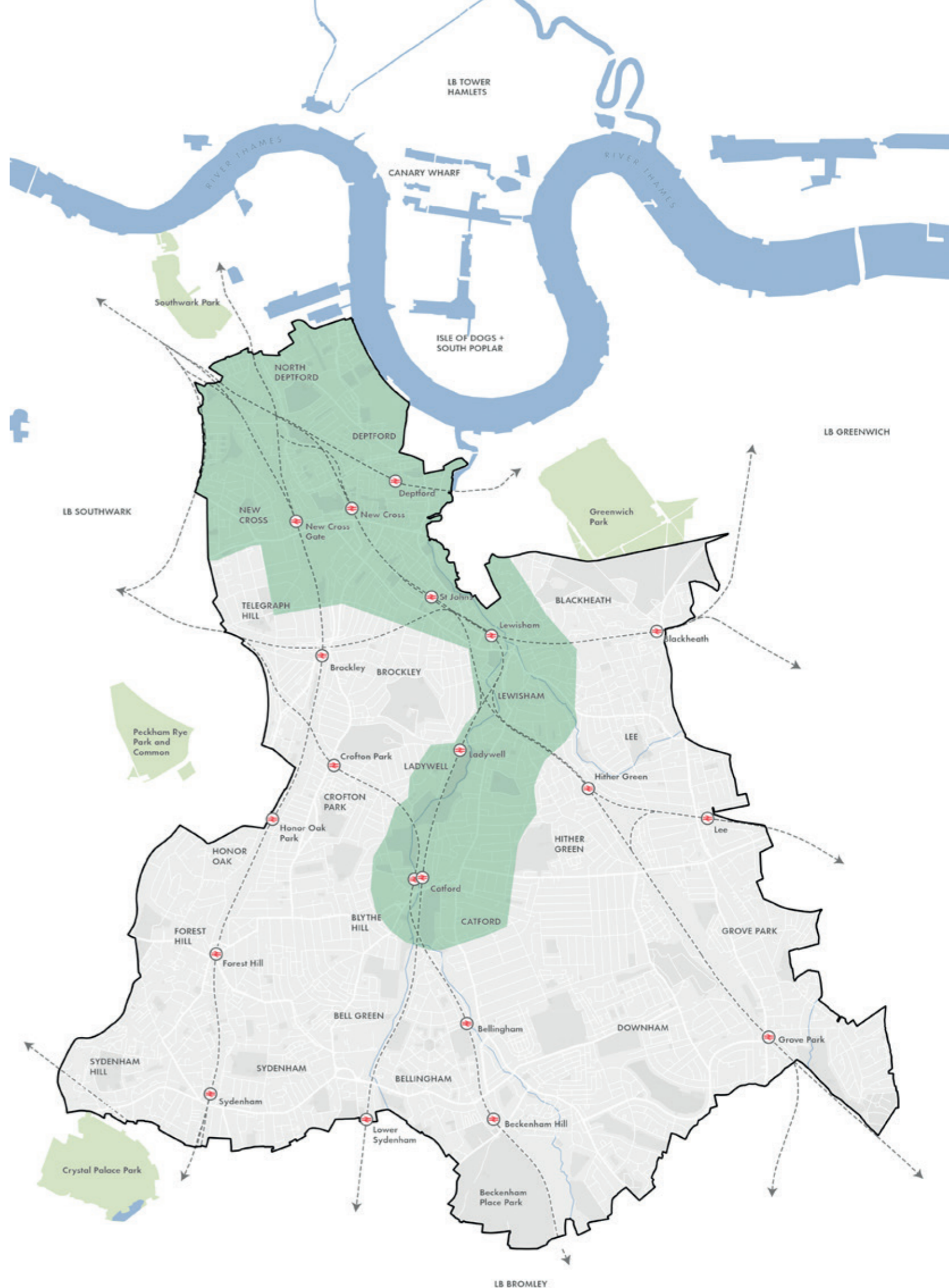
3.6.3 It should be noted that opportunity areas as expressed on the plan represent general areas for change as opposed to specific locations. So while some of the areas included within the shaded green area shown on the plan on the opposite page will be areas identified for change, it may also incorporate areas which are more sensitive to change, such as Conservation Areas. This, and other sensitivities, would make an area less suitable for tall buildings, and are addressed in Chapter 4 below.

3.6.4 For this reason this criteria is given the lowest weighting in the suitability assessment.

Low suitability rating



- Opportunity area
- Place intensification - re-examination character
- Place intensification - reinforce character
- Urban regeneration
- Employment intensification
- Corridor intensification



### 3.7 GROWTH AREAS

3.7.1 The Lewisham Characterisation Study has been prepared to help plan for the growth and regeneration of the borough. Whilst it provides a comprehensive record of built character across the Borough's many neighbourhoods, it also plays an important role in helping to identify area considered to be most suited to growth and regeneration. A number of different local categories were identified across the borough which are considered to present opportunities for growth, as follows:

- Place intensification
- Urban regeneration
- Employment intensification
- Corridor intensification

3.7.2 Whilst these local and non-statutory categories are not given the highest level weighting, they are considered more specific than the area-wide Opportunity Area designation and are therefore given the medium level of weighting in this suitability assessment.



### 3.8 BUILDING HEIGHTS AND TALL BUILDING CLUSTERS

3.8.1 The majority of the buildings within the borough are low rise residential dwellings between 2 - 4 storeys in height which increase its sensitivity to tall buildings as defined by the New London Plan.

3.8.2 Tall buildings do however exist, particularly in major and district centres with the highest concentration of these focussed around Lewisham Town Centre and along the west side of Lewisham High Street, contained by the River Ravensbourne.

3.8.3 However, more recently, a number of major regeneration schemes have been approved. Whilst not all have been constructed yet and some will take many years for delivery to be completed, it is important to assess their distribution when devising a policy stance on the appropriateness or otherwise of tall buildings across the borough as a whole.

3.8.4 In particular, major regeneration schemes in Deptford and Lewisham town centre might be relevant when considering which locations are appropriate for tall buildings. Smaller clusters of tall buildings exist in Catford, North Deptford and Deptford Bridge and Deptford Creek.

3.8.5 Areas of existing clusters of tall buildings are considered more suitable for tall buildings. The impact on the skyline of tall buildings in these locations would be far less dramatic than in other locations which helps to make them more suitable. The areas with the densest clusters of tall buildings have therefore been given medium weighting in the suitability assessment.

Medium suitability rating



### 3.9 TALL BUILDING SUITABILITY MAP

3.9.1 The adjacent plan is a composite of all the suitability plans which have been presented in this section of the report. This includes:

- High PTAL
- 12 minute walk from a Bakerloo station
- Major and district town centre
- Opportunity areas
- Growth areas
- Existing cluster of tall buildings

3.9.2 The suitability plans have been layered on top of one another to create a 'heat map' style plan which indicates areas which are more suitable for tall buildings.

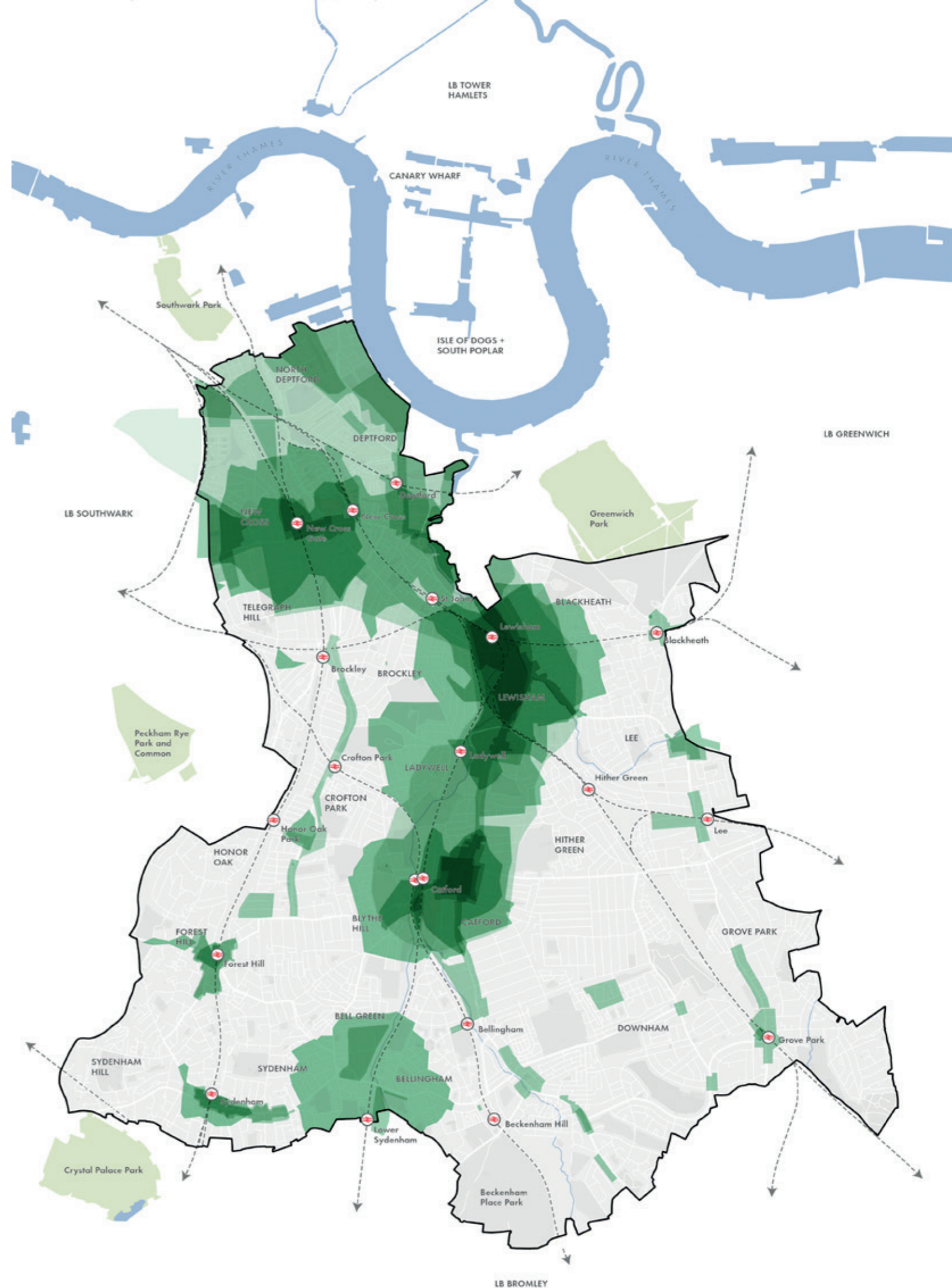
3.9.3 Those areas which are darker are considered most suitable due to the layering of multiple attributes.

3.9.4 Major and district centres, well served by public transport, which are located within Opportunity Areas are seen to be locations considered most suitable in principle. Local heritage, townscape and other sensitivities will however need to be carefully considered as any proposals come forward on a case by case basis.

3.9.5 Notwithstanding their respective potential sensitivities to the impacts of new tall buildings, the most suitable locations for tall building in the Borough of Lewisham area identified as being the commercial centres of Lewisham, Catford and New Cross with northern-most regeneration areas of the Borough and the Bell Green regeneration area also considered to show relatively high levels of potentially suitability.

3.9.6 However, a location's in-principle suitability for tall buildings does not take account of any local sensitivities that might be relevant. The following section provides analysis of these potential sensitivities which, when weighing up the relative merits of tall building proposals, will need to be considered alongside a site's suitability.

- High PTAL ● Hi
- 12 minute walk from a Bakerloo station ● Hi
- Major town centre ● Hi
- District town centre ● Med
- Opportunity area ● Low
- Growth area ● Med
- Existing cluster of tall buildings ● Med

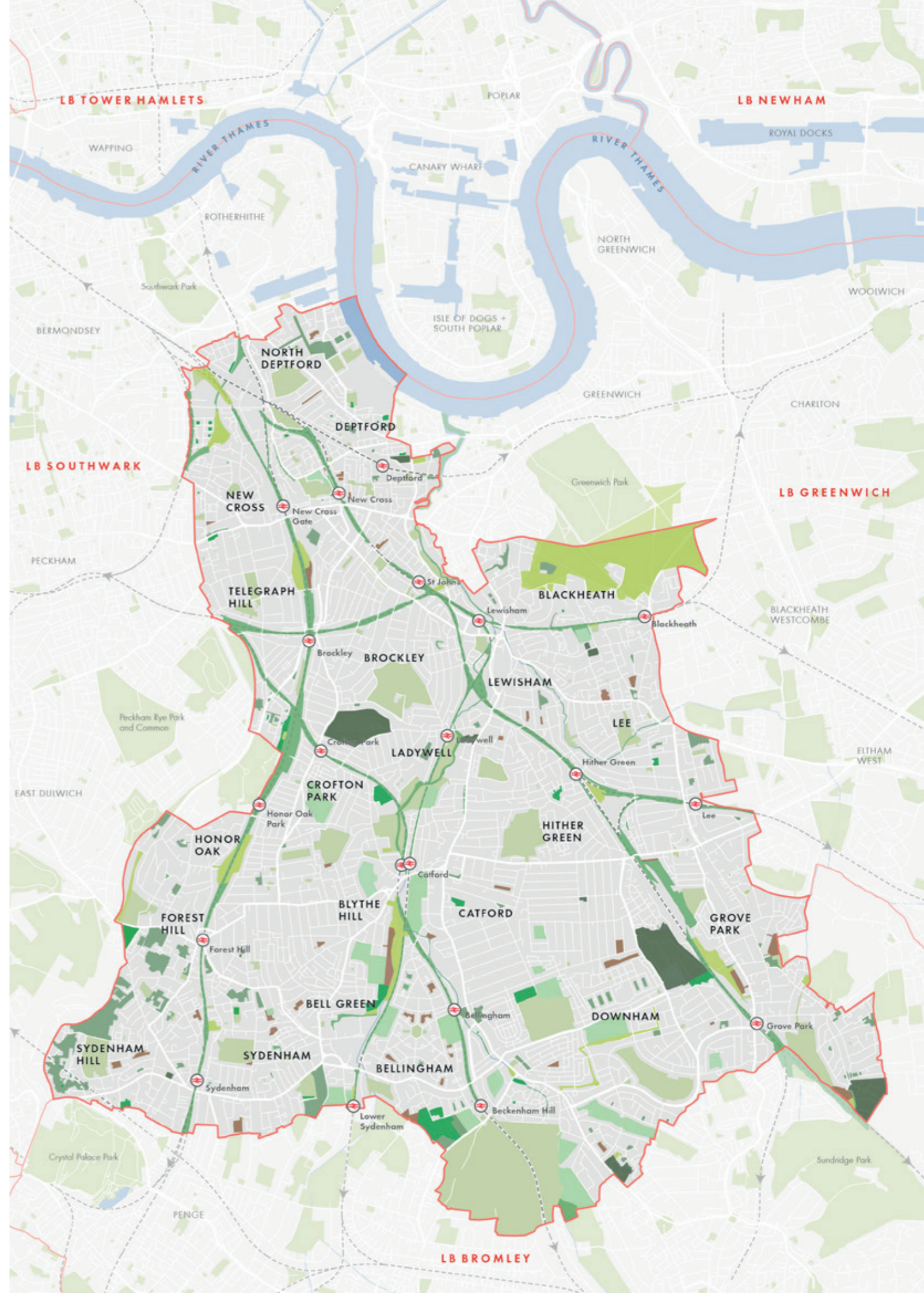


### 3.10 GREEN, OPEN SPACE AND RIVERS

- 3.10.1 This plan shows the range of open and green spaces which exist within the London Borough of Lewisham.
- 3.10.2 Although green and open spaces have not been applied as an indicator of suitability or sensitivity for the development of tall buildings, it is still considered to be a key issue when considering their appropriateness.
- 3.10.3 Local green or open spaces can be considered useful where tall buildings are unable to provide sufficient amenity within the building itself.
- 3.10.4 It has also been shown that proximity to green space can impact a person's mental well-being, with those living within close proximity to an open or green space having improved mental well-being.
- 3.10.5 However, tall buildings in close proximity to open or green space can equally have a negative impact, with the potential to cause overshadowing leading to an impact on the growth of vegetation.
- 3.10.6 The often wide and open spaces created by parks can often offer opportunities for pleasant prospects, whether it be a high quality street elevation or a wider view across the city. Proposals for tall buildings should be sensitive to such setting and views so as not to detract from the quality and enjoyment of the park.
- 3.10.7 How tall buildings might interact with rivers should also be considered where overshadowing may harm its biodiversity.

#### Green and open spaces

-  Allotments
-  Green Corridors
-  Children and Teenagers
-  Amenity
-  Cemeteries and Church Yards
-  Natural Green Spaces
-  Outdoor Sport Facilities





### 3.11 CYCLING TRANSPORT ACCESSIBILITY LEVEL (CTAL)

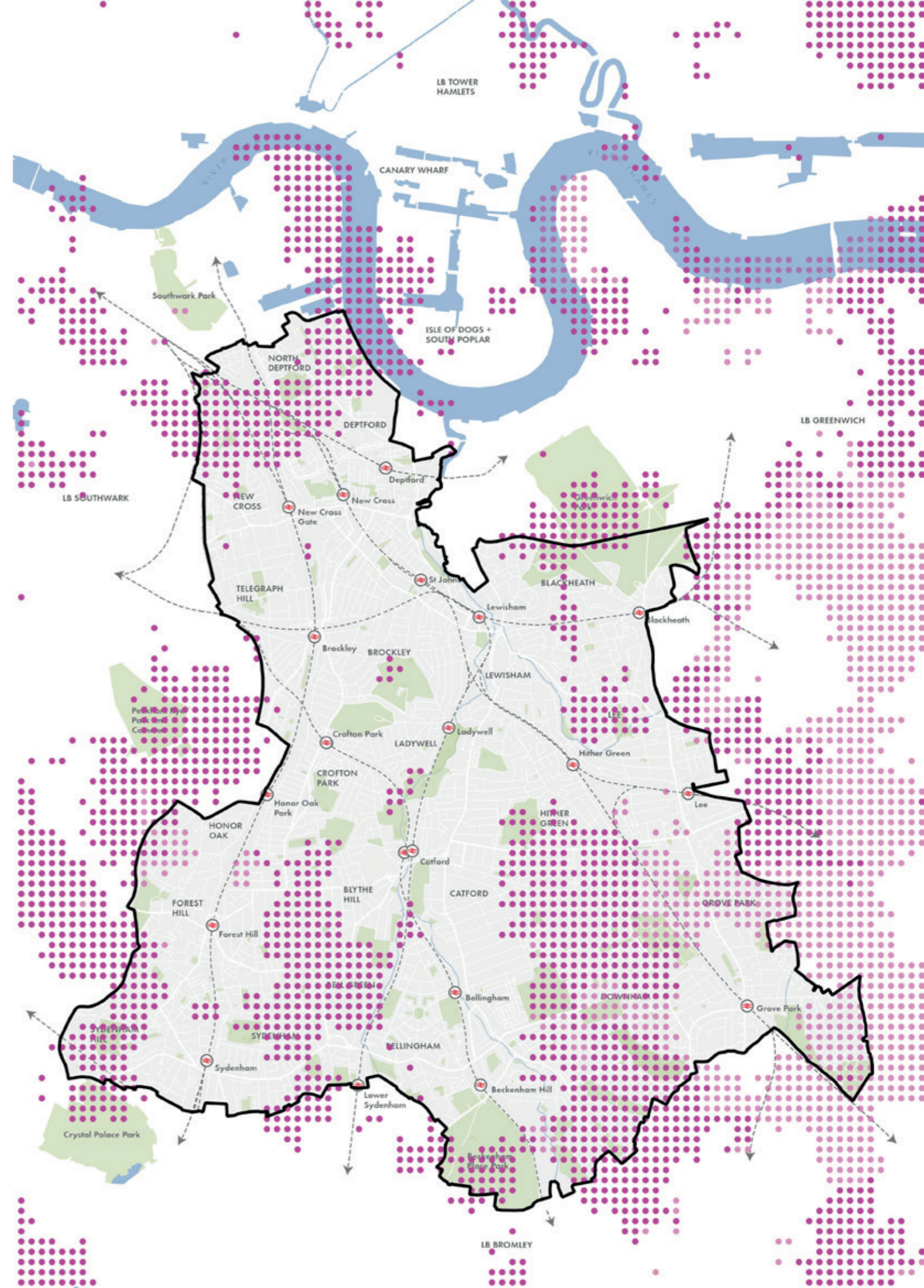
#### CTAL

3.11.1 Transport for London continue to invest in cycling infrastructure to help promote active travel which has far reaching and wide ranging benefits for the capital's residents, workers and visitors. CTAL is an emerging dataset which maps where cycling infrastructure is in place to improve accessibility to one or more railway or London Underground station. In doing so it offers some level of support to the case for higher density development by reducing reliance on the private car.

3.11.2 Although CTAL as not been applied as an indicator of suitability or sensitivity for the development of tall buildings in this study, it is still considered to be a key issue when considering their appropriateness.

3.11.3 The emerging and developing TfL dataset shown here seeks to identify locations which benefit from good level of accessibility to railway and London Underground stations by cycling. It limits the data search to areas which do not have access to station by walking which explains why in the raw data CTAL plan for Lewisham shown on the opposite page, many of the most accessible locations in the Borough, such as the area around Lewisham Station, falls outside the CTAL zones.

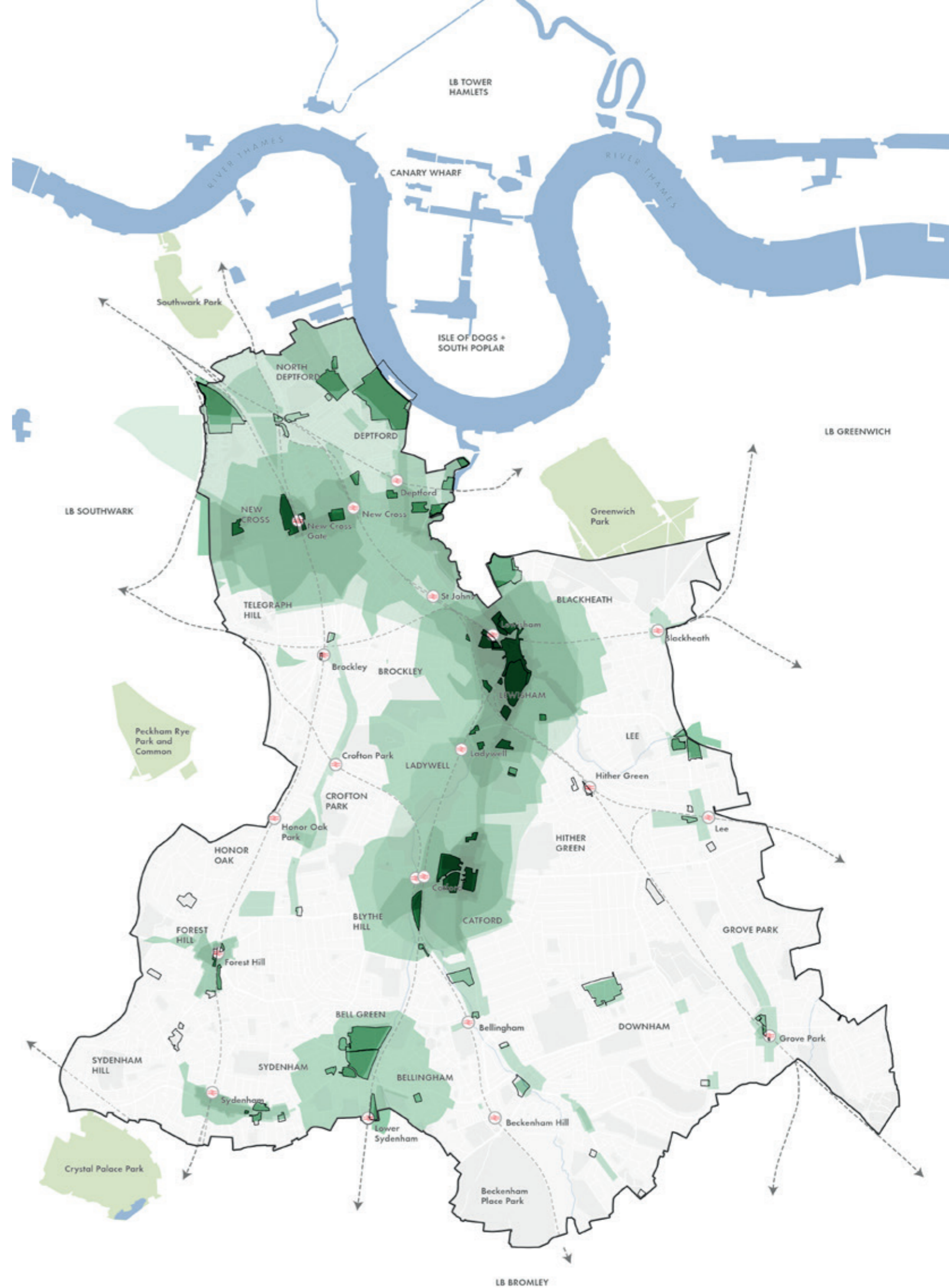
3.11.4 Two categories of area are identified. The darker purple dots represent 100m grid locations which are accessible to at least 5 station by cycling. The paler dots represent 100m grid locations which are accessible to at least 1 station by cycling.



### 3.12 SITE ALLOCATIONS

- 3.12.1 The adjacent plan overlays the emerging Local Plan site allocations on the tall buildings suitability plan. It reveals that the majority of potential site allocations fall within areas that are generally considered more suitable for tall buildings.
- 3.12.2 The bulk of the potential Lewisham Local Plan site allocations are either key sites within existing town and district centres, or are major regeneration sites which fall within one of the Borough's two adjacent Opportunity Areas.
- 3.12.3 Whilst there will clearly be site specific sensitivities associated with each and every site allocation, the correlation between the location of these emerging site allocations and the areas considered more suitable for tall buildings suggests that these sites will be well located to make a very significant contribution to meeting local housing and job creation needs across the borough.

- High PTAL ● Hi
- 12 minute walk from a Bakerloo station ● Hi
- Major town centre ● Hi
- District town centre ● Med
- Opportunity area ● Low
- Growth area ● Med
- Existing cluster of tall buildings ● Med



## 4 SENSITIVITY ASSESSMENT

### 4.1 INTRODUCTION

- 4.1.1** The preceding layered analysis helps to identify those locations across the borough which are considered, in-principle, to be more suitable for tall buildings. However, this analysis does not take into account a range of potential issues which might make any given site particularly sensitive to the potentially negative impacts of new tall buildings on any given site. It follows therefore that, whilst a site may be suitable by virtue of its central location and the fact that it is well served by public transport, it may also be highly sensitive to the impacts of tall buildings.
- 4.1.2** This section sets out a series of analysis plans which reveals a series of sensitivities within the borough which make sites and locations potentially more sensitive to the development of tall buildings. It will therefore be important to ensure that, when considering proposals, a site's suitability and sensitivities are both considered so a balanced view can be taken on the relative importance of all relevant issues.
- 4.1.3** Like the suitability analysis plans, each potential sensitivity has been given a weighting based on an assessment of its influence and impact on the development of tall buildings. This has then translated into a composite 'sensitivity plan' which is presented as the concluding plan in this section of the report. Where the colour appears darker on the plan, the sensitivities are considered to be more acute.
- 4.1.4** The page overleaf provides an overview of all the sensitivities which have been considered as limiting a location's suitability for tall buildings, and an explanation of the weighting which has been applied to each.

## 4.2 ASSESSMENT OF SENSITIVITY

<b>HERITAGE</b>	<b>weighting</b>
<b>World Heritage Sites &amp; Buffer Zones</b>	
<b>Conservation areas</b>	
<b>Areas of Special Local Character</b>	
<b>Listed buildings</b>	
<b>Locally Listed buildings</b>	
<b>VEWS</b>	
<b>LVMF viewing corridor</b>	
<b>LVMF wider setting cons area</b>	
<b>Extended LVMF wider setting cons area</b>	
<b>Local view buffers</b>	
<b>HEIGHTS</b>	
<b>Areas characterised by consistent building heights</b>	
<b>TOPOGRAPHY</b>	

### World Heritage Sites and Buffer Zones

**4.2.1** The buffer zone of the Maritime Greenwich World Heritage Site (WHS) extends in to the north-east of the borough over Blackheath Common. Tall buildings with the site itself and its buffer zone are considered to be inappropriate in principle. Whilst cases will need to be considered on their merits, this is a very strong policy offering significant strategically important projection to the setting of these internationally important heritage assets. It is therefore afforded significant weight in this assessment of sensitivity to tall buildings.

**4.2.2** Specifically, the London View Management Framework says: Development should not cause adverse impact on World Heritage Sites or their setting, including any buffer zone which is likely to compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity and significance. In considering planning applications appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plans.

**4.2.3** The New London Plan says: buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it. As a result, they have been assigned the highest level of sensitivity.

### Conservation areas

**4.2.4** Conservation areas are a well-established designation employed by local planning authorities to manage areas of special architectural or historic interest. The historic environment is a vital part of creating a sense of place; not only do local people value the historic environment and historic assets, they often add financial value to the property. Proposals for tall buildings will need to ensure that conservation areas and other historic assets continue to be preserved and enhanced. As a result, they have been assigned the highest level of sensitivity.

**4.2.5** That said, conservation is not only about preservation but also enhancement. Many of the borough's conservation areas fall in areas considered to be potentially suitable for tall buildings. A conservation area designation does not rule out new tall buildings. They are therefore assigned with significant weighting in this this assessment, but are given less priority than the Maritime Greenwich WHS.

### Areas of Special Local Character

**4.2.6** Areas of special local character are designed locally to capture historically important areas that do not meet the criteria of a conservation area. They are therefore considered to be sensitive to the development of tall buildings, but less so than that of a conservation area.

### Listed buildings

**4.2.7** Special regard needs to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the interest in the building, as opposed to keeping it utterly unchanged. Analysis that is specific to the application in question will be required to determine the potential impact of new development on such heritage assets. Borough-wide mapping is not the optimum tool to express and define the extent of any such sensitivity. However, the mapping analysis undertaken flags the importance of listed and locally listed buildings and presents an image of their widespread distribution right across the Borough.

### LVMF viewing corridor and consultation areas

**4.2.8** The north of the borough is traversed by two protected vistas from Greenwich Park (General Wolfe's Statue) and Blackheath Point to the dome of St Paul's Cathedral defined by Directions of the Secretary of State. These vistas are set within a London panorama described in the Mayor of London's View Management Framework Supplementary Planning Guidance. The intention of this guidance and the directions is to manage the panoramic views of London and St Paul's Cathedral by ensuring that new tall development does not compromise the experience of the view, and to preserve the crucial elements of the identified landmarks and paramount townscape features within the view. Tall buildings that would negatively impact on these strategically important views will not be permitted.

**4.2.9** Immediately beyond the LVMF viewing corridors themselves are defined wider setting consultation areas

which also extend beyond the landmark as the view backdrop. The guidance contained in the LVMF will be of primary importance when assessing developments which impact on these views. The wider consultation areas have been represented by view cone outlines rather than shades in order to communicate that the impact of new development on these zones area will need to be assessed through a review against the guidance contained in the LVMF.

### Local view buffers

**4.2.10** Locally, a number of important local views have been identified for protection. These are considered to be locally significant panoramas seen from the public open spaces on the low hills that surround the Ravensbourne Valley. It is considered that they are important features of the local character and topography of the borough. A significant local view of the Thames has also been identified as seen from the listed buildings at Deptford Wharf. This local view will also act to preserve the setting of the listed buildings. These local views are also expressed on the relevant plans as the outline of viewing cones rather than fills because of the extensive geographic areas they cover and the fact that some of the views are identified as important because they exist i.e. views from hill tops, rather than as a policy means to resist development. Development which impacts on these views will need to be considered on a case by case basis.

### Areas characterised by consistent building heights

**4.2.11** Large areas of the Borough are characterised by suburban housing which have vary consistent building heights. These areas are likely to be more sensitive to the impacts of tall buildings than areas characterised by a more varied range of building heights.

### Topography

**4.2.12** The Quaggy, Pool and Ravensbourne rivers extend towards the Thames across the borough across generally low-lying land. Gradients rise either side of these river 'valleys'. Taller buildings on higher, more prominent positions will be seen more widely and will have a greater impact on the surrounding area.

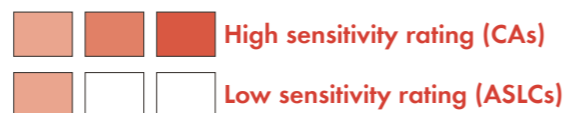
### 4.3 WORLD HERITAGE SITES

- 4.3.1 The buffer zone for the Maritime Greenwich World Heritage Site extends across Shooters Hill into Lewisham Borough.
- 4.3.2 The GLA's World Heritage Sites SPD draws attention to the potential threat posed to the outstanding universal value of Maritime Greenwich from tall buildings in the setting which have the potential to impact adversely on its visual integrity.
- 4.3.3 Given the acute sensitivity of this globally significant cluster of heritage assets, it is considered highly likely that proposals for tall buildings within the buffer zone would be considered inappropriate.
- 4.3.4 The zones has been attributed the highest level of sensitivity in this analysis.

**High sensitivity rating**



### 4.4 CONSERVATION AREAS AND AREAS OF SPECIAL LOCAL CHARACTER

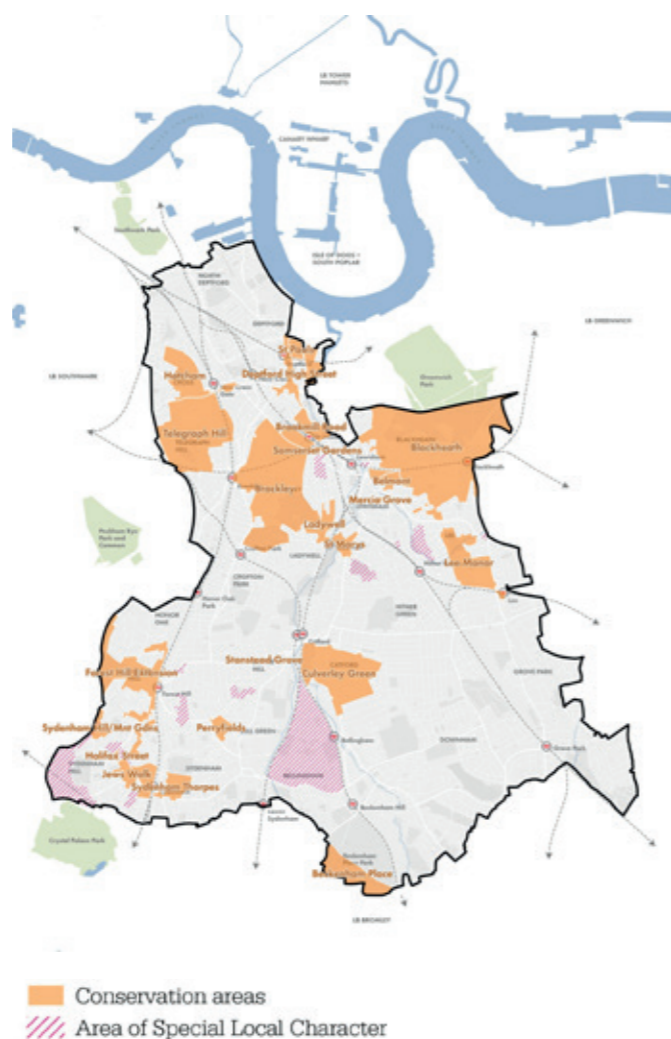


4.4.1 There are 29 conservation areas in Lewisham as follows. These are highlighted in the darker tone to signify a higher degree of potential sensitivity on the adjacent plan:

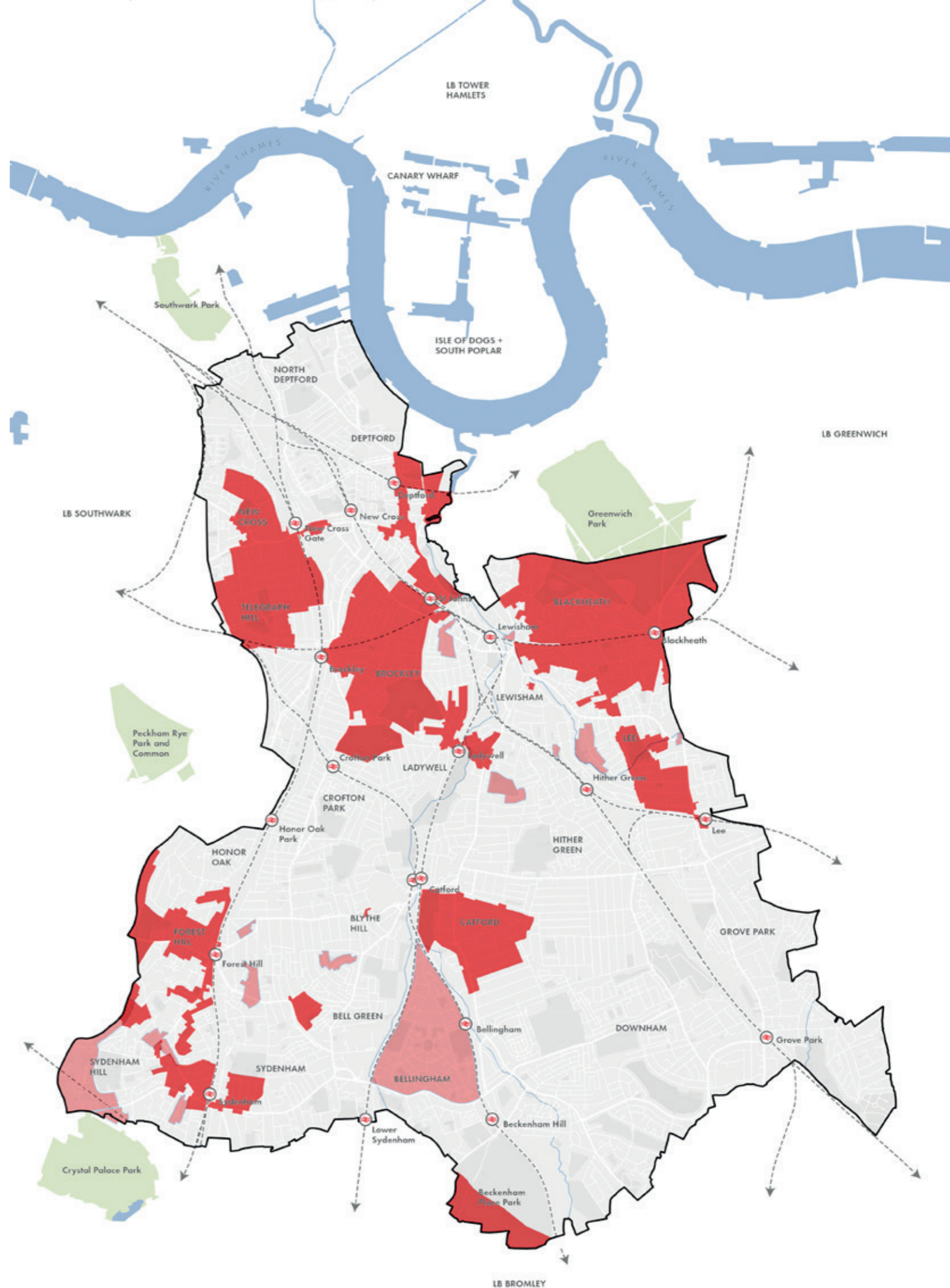
- Beckenham Place Park
- Belmont
- Blackheath
- Brockley
- Brookmill Road
- Cobb's Corner
- Culverley Green
- Deptford Creekside
- Deptford High Street and St Paul's
- Deptford Town Hall
- Forest Hill
- Halifax Street
- Hatcham
- Jews Walk
- Ladywell
- Lee Manor
- Lewisham Park
- Mercia Grove
- Perry Fields
- Perry Vale and the Christmas Estate
- St John's
- St Stephen's
- Somerset Gardens
- Stanstead Grove
- Sydenham Thorpes
- Sydenham Hill
- Telegraph Hill
- St Mary's
- Sydenham Park

4.4.2 There are 13 Areas of Special Local Character which are highlighted in the lighter tone to signify a potentially lower level of sensitivity when compared with that associated with conservation areas.

4.4.3 A significant area of the borough is covered by conservation area designations and areas of special local character. The character of these different areas varies significantly across the borough. Some of these areas cover major centres which may be flagged as potentially suitable locations for tall buildings.



- 4.4.4 Tall buildings within conservation areas or areas of special local character may be appropriate but a primary consideration will be to ensure that the character of the conservation area is preserved or enhanced by the development proposal and the character of the area of special local character is not harmed.
- 4.4.5 A professional, reasoned and evidence-based judgement will need to be made in coming to such a view.



### 4.5 LISTED BUILDINGS

4.5.1 There are around 540 listed buildings across Lewisham borough, most of which are listed Grade II. There are however 35 Grade II\* listed buildings and two Grade I listed buildings.

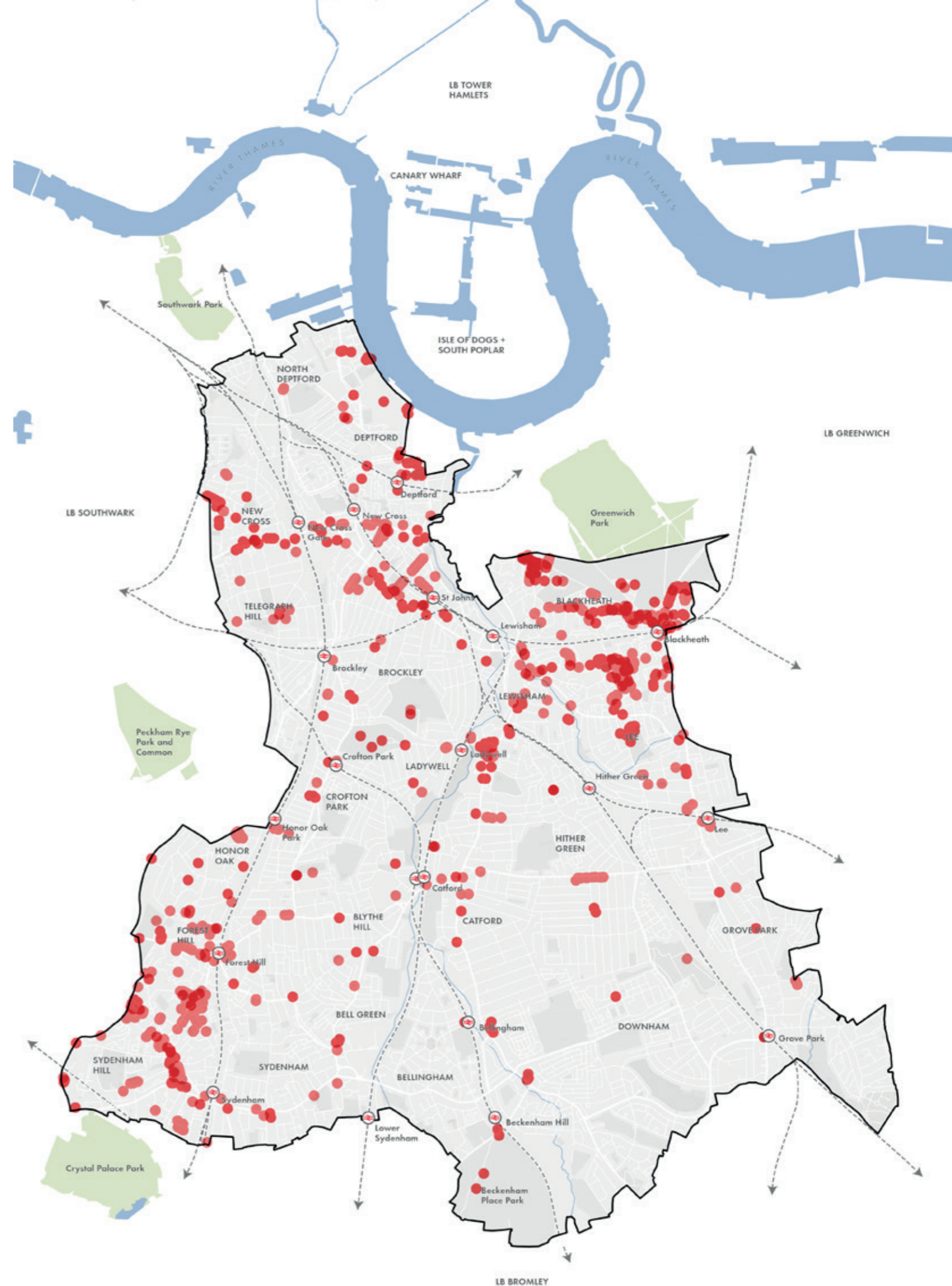
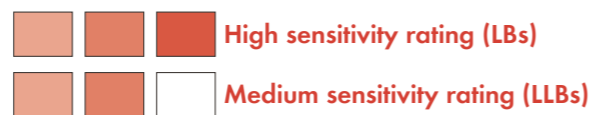
4.5.2 It should be recognised that mapping analysis at this borough-wide scale is not considered an optimum way of mapping the degree to which any given site might be sensitive to tall buildings in view of its proximity to a listed building. It is essential that each site will be considered on its merits.

4.5.3 In addition, it may be that degree any given site is sensitive to the impact of a proposals for a tall building might also be affected by the category of listing. But again, this cannot be mapped in a reliable manner at this borough-wide scale and detailed site specific analysis will need to be undertaken.

4.5.4 The Borough has also prepared a register of Locally Listed buildings - buildings or structures which are important in the local context due to their architectural or historic interest or their townscape or group value. Given that these structures do not carry to statutory weight of a formal listing, it may be that the level of sensitivity associated with such structures is considered to be lower than that associated with buildings on the statutory list. However, those judgements can only properly be made with detailed site analysis and historical research.

4.5.5 The adjacent map shows the distribution of listed and locally listed buildings across the Borough. The plan opposite attributes a 100m buffer around the location point for all listed and locally listed buildings across the borough. The 100m buffer has no technical status and locations well beyond this distance could remain highly sensitive to the proximity of listed or locally listed buildings. The plan therefore simply highlights the distribution of historic buildings but detailed site specific analysis will be required to demonstrate that the impact of new proposals for tall buildings have taken into account potential impacts on this heritage assets.

4.5.6 Buildings on the statutory list are given the highest level of sensitivity weighting whilst locally listed building are given a medium level weighting.



### 4.6 STRATEGIC AND LOCAL VIEWS AND LANDMARKS

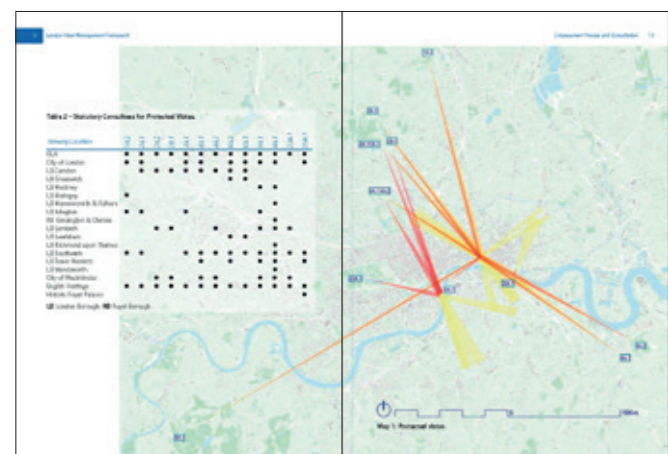
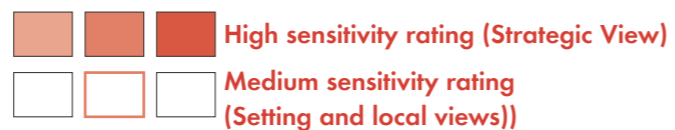
4.6.1 Strategic and local views extend across significant parts of the Borough. The London View Management Framework (LVMF) provides detailed guidance on views to key London Landmarks from a range of high profile locations. These viewing corridors, their wider setting and their respective backdrops are considered to be of strategic importance to London and its skyline.

4.6.2 Proposals for buildings which impinge on these viewing corridors, their wider setting or backdrops will be assessed in detailed in view of the guidance contained in the LVMF and a view will be taken.

4.6.3 The analysis presented in this report and the relative weighting given to the strategic viewing corridor on the adjacent analysis plan demonstrates the importance of protecting these views from the adverse impacts of developments which would impact on these identified views.

4.6.4 A web of local views, often relating to sight lines to local landmarks, extends across large parts of the borough. The impact of new, potentially tall, development on these views will need to be assessed on a case by case basis.

4.6.5 Given the expansive geographic coverage of areas that fall within these viewing corridors,



London View Management Framework Protected Vistas





### 4.7 AREAS CHARACTERISED BY CONSISTENT BUILDING HEIGHTS

4.7.1 Analysis of GIS data relating to the heights of all existing buildings across the borough reveals interesting patterns which help to highlight potential area-based sensitivities to the impacts of tall buildings.

4.7.2 The adjacent Box Plot diagram presents the spectrum of building height variance across the borough on a ward-by-ward basis. Whilst high level, this data illustrates some stark differences in the character of the built environment across the Borough's wards.

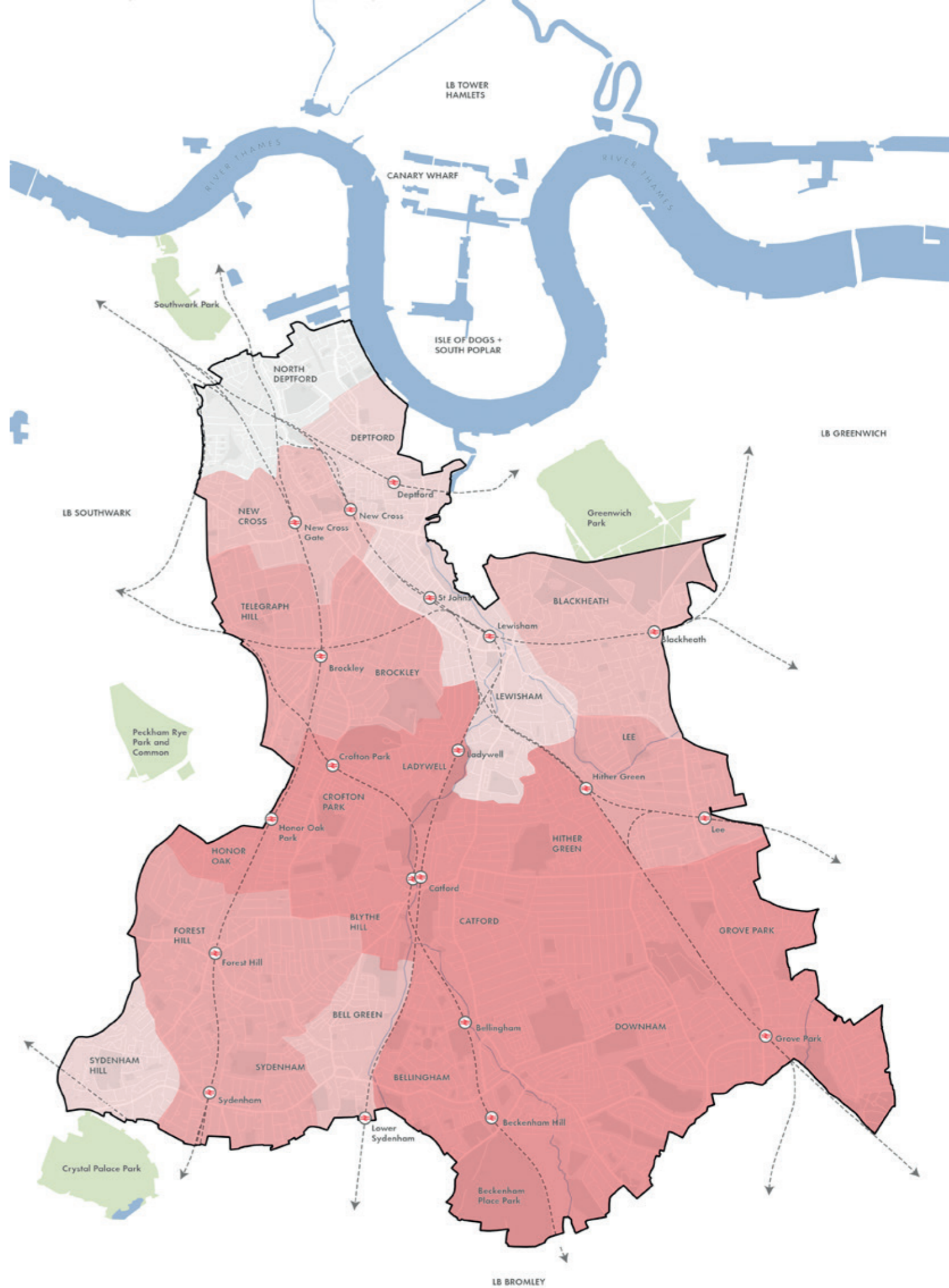
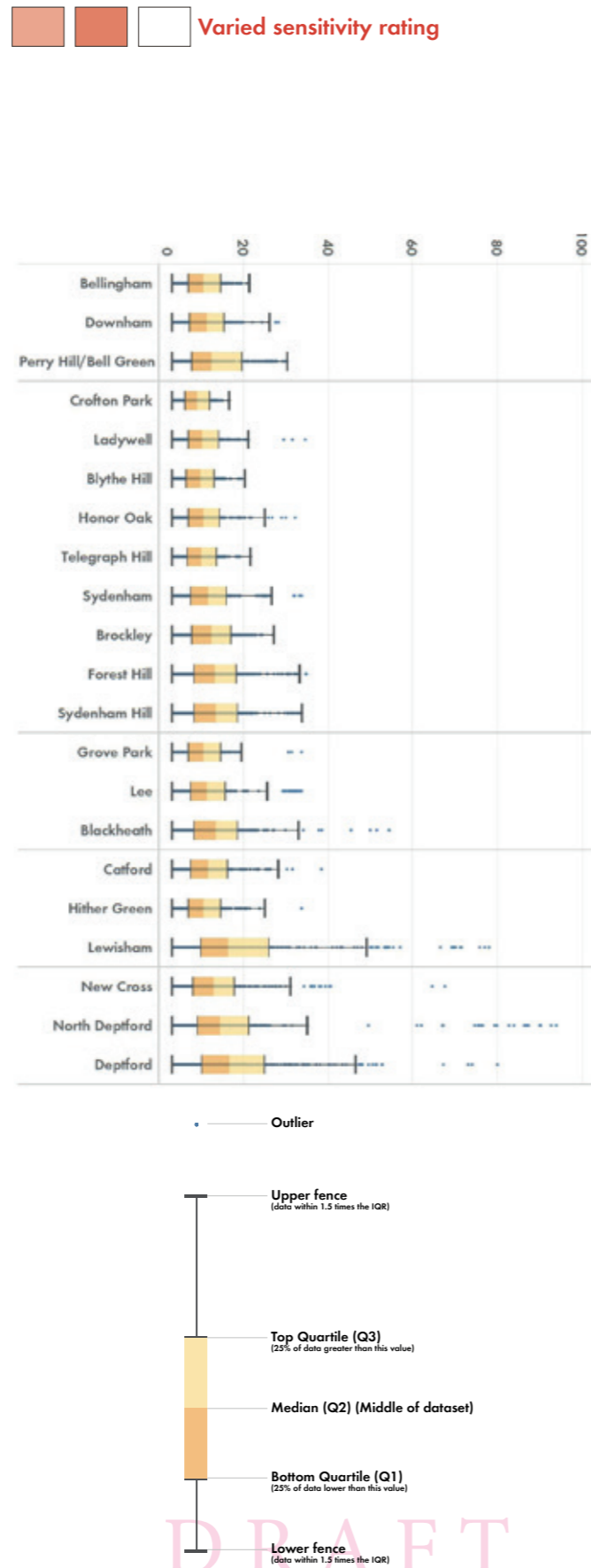
4.7.3 It shows that, generally speaking, building heights are far more varied within the northern and south-western wards. The wards of North Deptford, Lewisham, Deptford and Sydenham Hill have the widest spectrum of building heights.

4.7.4 Conversely, there is very limited variance in building heights in Grove Park, Honor Oak, Blythe Hill, Catford, Downham, Ladywell, Crofton Park and Bellingham.

4.7.5 Cross checking the building height variance data with analysis of existing building heights reveals that the areas where building heights are typically most consistent are also areas where building heights are typically modest and principally domestic in scale.

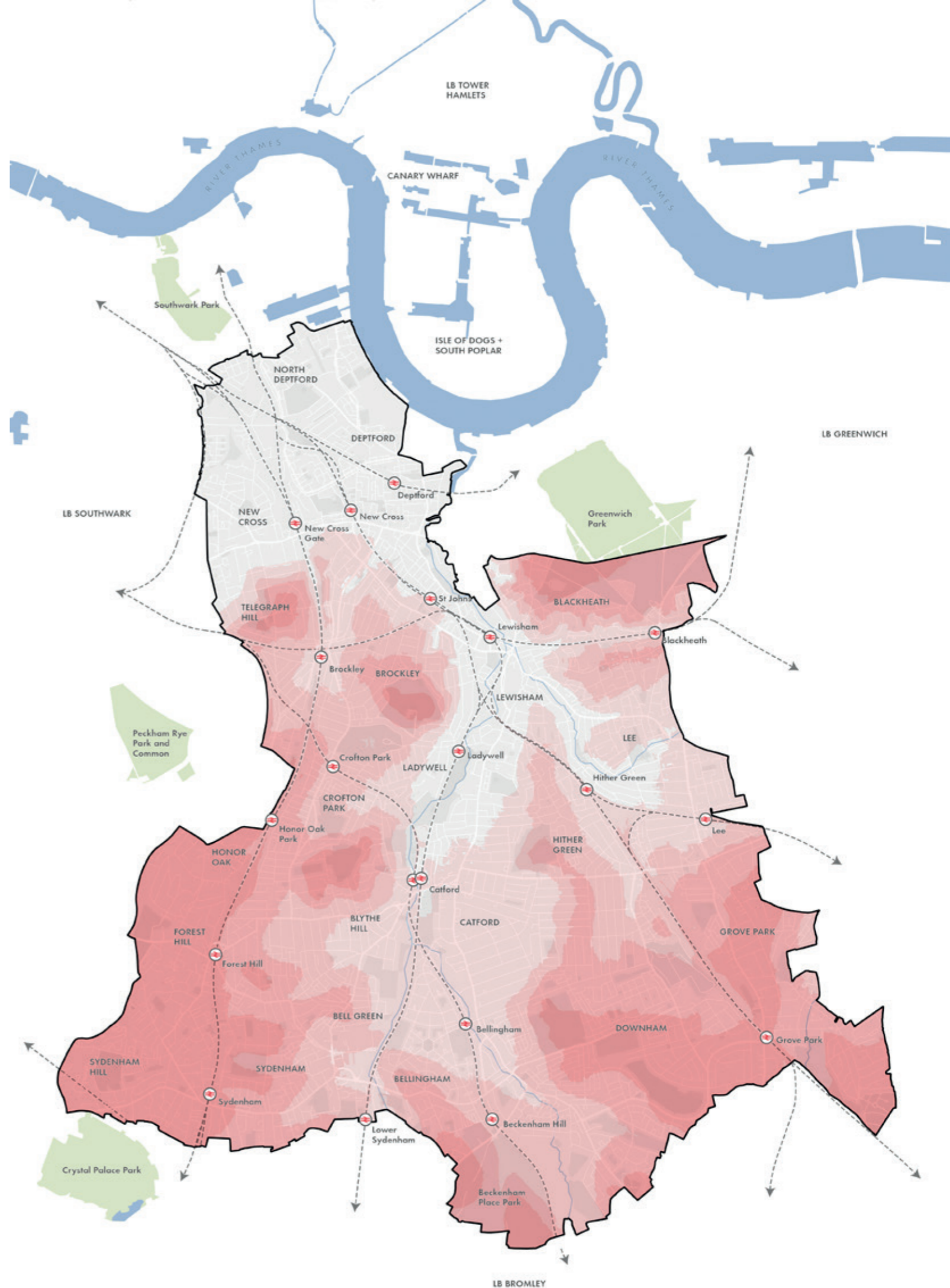
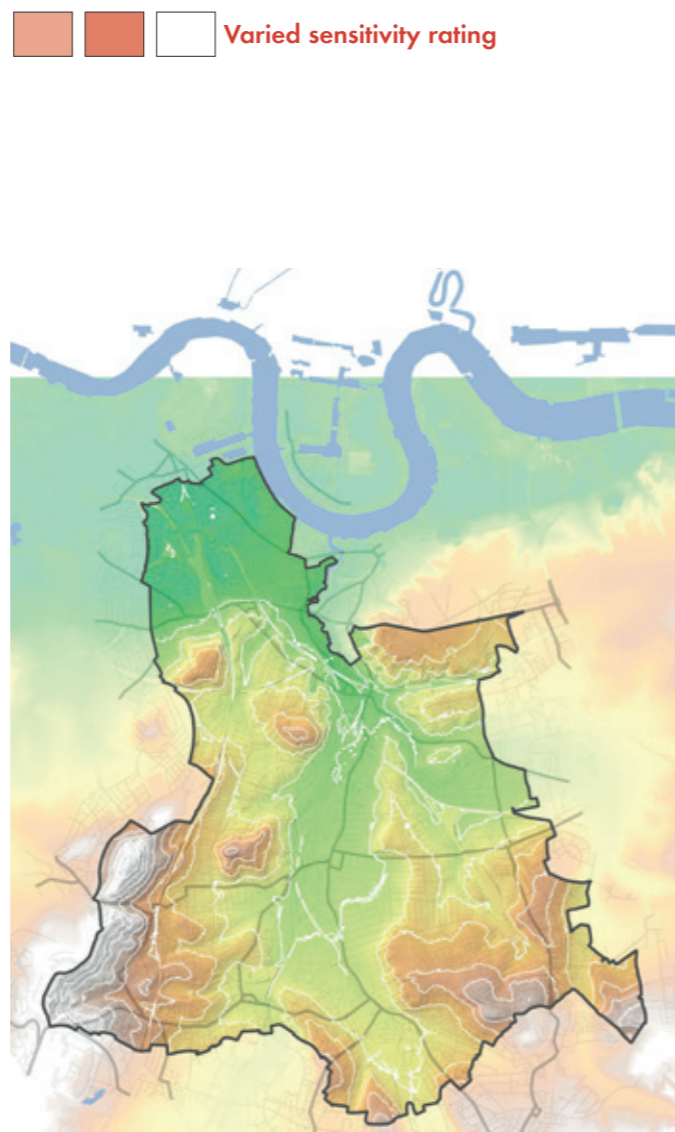
4.7.6 Therefore, it can be said areas characterised by very consistent building heights would be more sensitive to the potentially negative impacts of new tall buildings.

4.7.7 The weighting of this sensitivity criteria has been applied in a graded manner with those areas characterised by the most consistent buildings heights being identified as most sensitive to the impacts of tall buildings and those areas where there is a wide deviation in buildings heights identified as being less sensitive.



### 4.8 TOPOGRAPHY

- 4.8.1 The natural profile of an area helps to define its character along with the cultural and historic character of its built heritage. Lewisham has a distinctive natural form deriving from the valley of the Ravensbourne, Pool and Quaggy rivers. The valley is flanked by a number of open spaces on low hill tops that can be seen from different parts of the borough and which contribute to its verdant character. The south western corner of the borough is hilly forming part of the Sydenham Ridge visible from across London (e.g. from Parliament Hill on Hampstead Heath).
- 4.8.2 The area north of the A2 leading down towards the Thames is flatter in character, and as a result horizons are more limited. Way-finding can become difficult due to a poorly connected street network and the absence of distinctive landmarks.
- 4.8.3 This topographical profile should be carefully considered when designing proposals for tall buildings. Tall and bulky buildings on high ground can easily appear overbearing and have a negative impact on the residential amenity of adjacent areas as well as having a greater impact on the borough's skyline. Tall buildings in flatter urban areas, while still needing careful consideration, can contribute to placemaking and character by providing landmarks and interest to the skyline. The adjacent map shows the topography of the borough.
- 4.8.4 It is therefore considered that tall buildings on areas of higher ground are more likely to be more sensitive to the impacts of new tall building proposals. This pattern of analysis has been mapped on the plan on the facing page. It follows that the areas of Blackheath, Downham, Forest Hill, Ladywell, Telegraph Hill and Blythe Hill could all be particularly sensitive to the impacts of a new tall building.



### 4.9 TALL BUILDING SENSITIVITY MAP

4.9.1 The adjacent plan is a composite of all the layers of sensitivity which have been presented in this section of the report. This includes:

- World Heritage Zones and Buffer Zones;
- Conservation areas;
- Listed and locally listed buildings;
- Strategic and local views and landmarks;
- Areas characterised by very consistent building heights; and
- Topography.

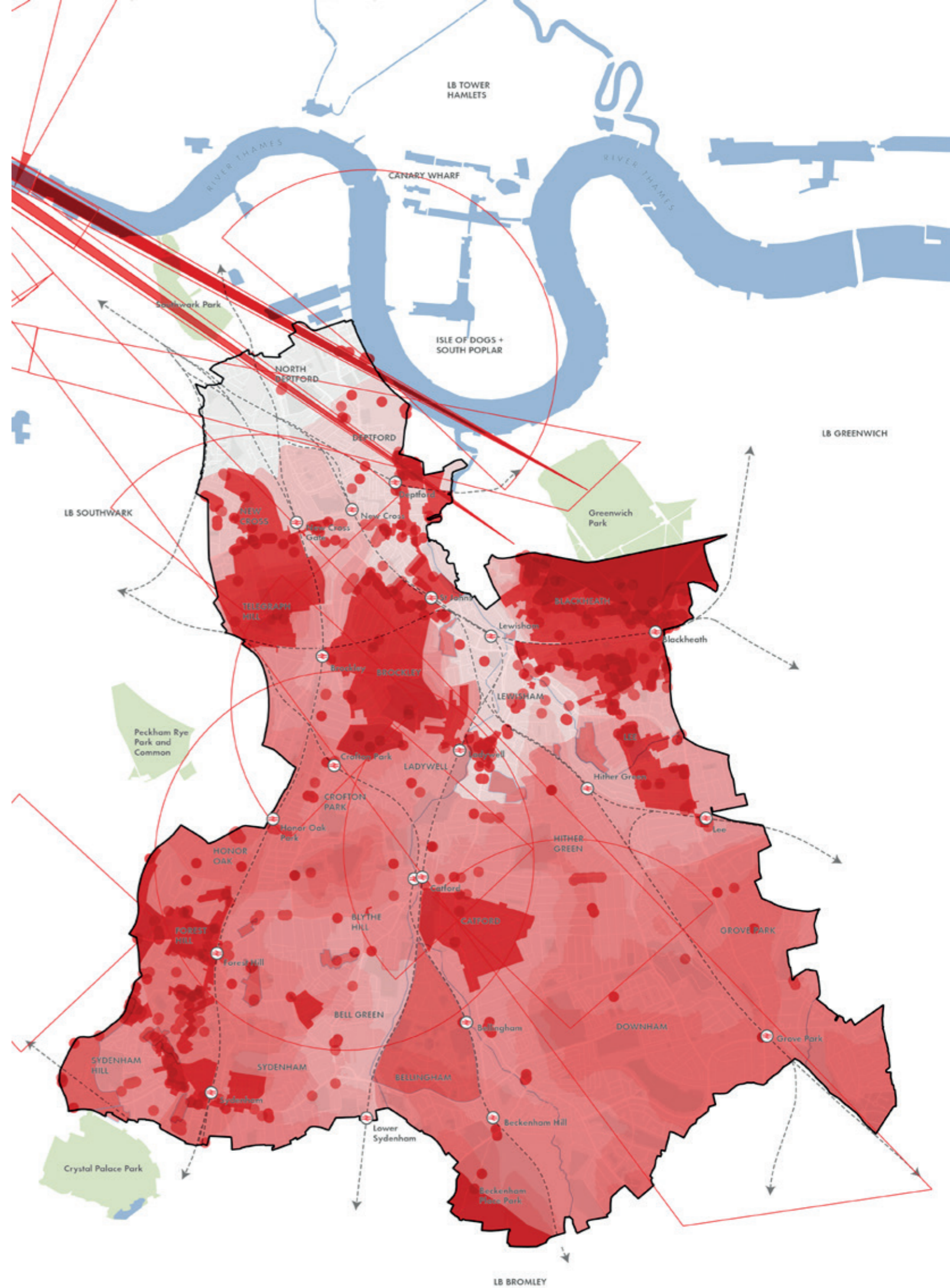
4.9.2 The sensitivity plans have been layered on top of one another to create a 'heat map' style plan which indicate areas which are more sensitive to tall buildings.

4.9.3 Those areas which are darker are considered more sensitive due to the layering of multiple sensitivities.

4.9.4 Based on the analysis as presented here, it is the areas with the greatest concentration of heritage assets that are the most sensitive to the impacts of new tall buildings.

4.9.5 However, it should be noted that these sensitivities are not exhaustive and each potential tall building application should be considered on its own merit, within the context of the site's existing constraints and sensitivities. The relative weighting attributed to different sensitivities in this analysis might need to be refined on a case by case basis due to the unique setting of each individual site.

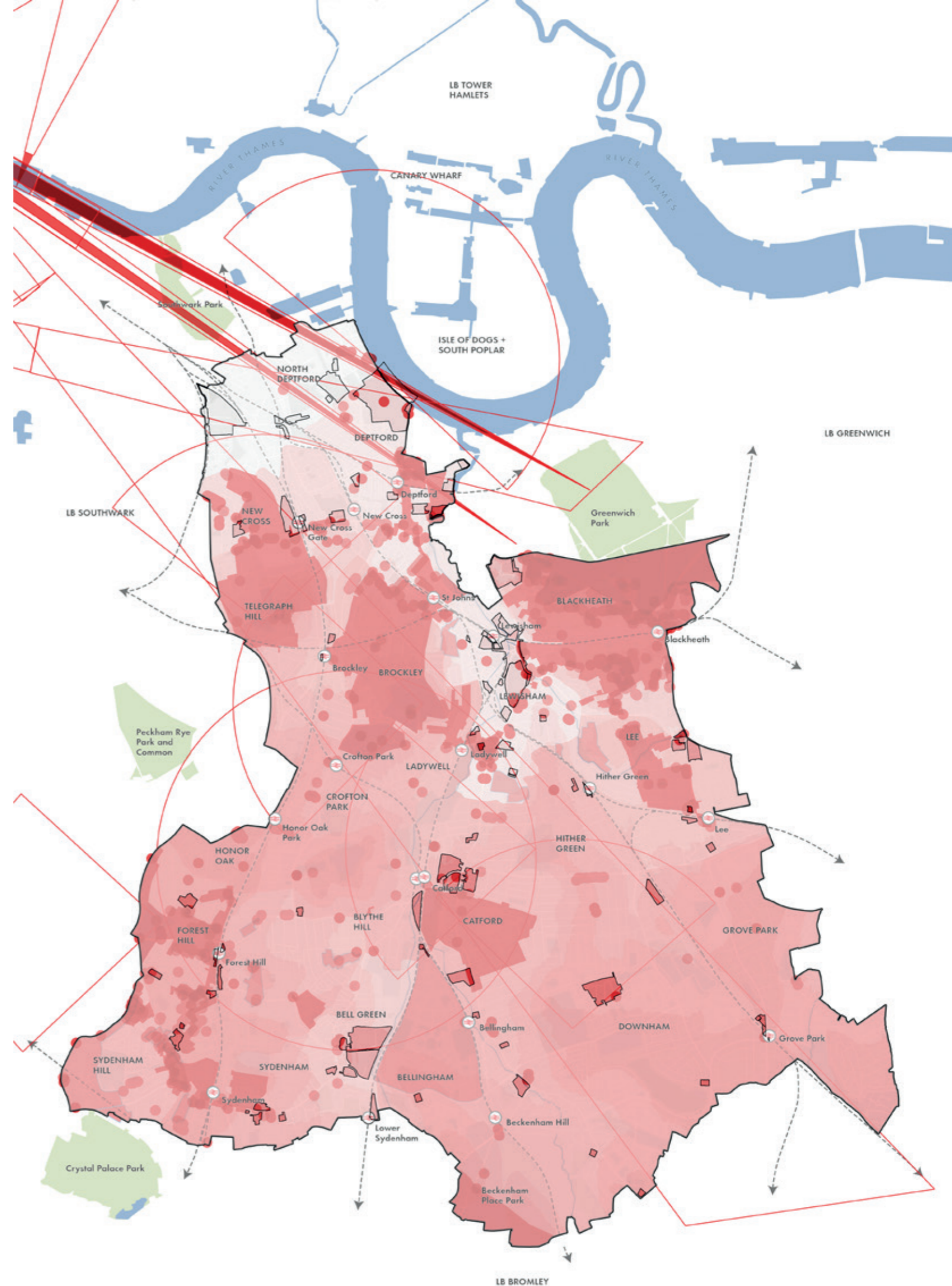
- World Heritage Sites & Buffer Zones ● Hi
- Conservation areas ● Hi
- Areas of Special Local Character ● Low
- Listed buildings ● Hi
- Locally listed buildings ● Med
- LVMF viewing corridor ● Hi
- LVMF wider setting cons area ○ Med
- Extended LVMF wider setting cons area ○ Med
- Local view buffers ○ Med
- Areas characterised by consistent building heights ● Var
- Topographical ● Var



### 4.10 SITE ALLOCATIONS

- 4.10.1 The adjacent plan overlays the emerging Local Plan site allocations on the tall buildings sensitivity plan. It reveals that the majority of the potential site allocations fall some of the areas found to be less sensitive to the impacts of tall buildings.
- 4.10.2 The bulk of the potential Lewisham Local Plan site allocations are either key sites within existing town and district centres, or are major regeneration sites which fall within one of the Borough's two adjacent Opportunity Areas.
- 4.10.3 Whilst there will clearly be site specific sensitivities associated with each and every site allocation, the correlation between the location of these emerging site allocations and the areas considered less sensitive to the impacts of tall buildings suggests that these sites will be well located to make a very significant contribution to meeting local housing and job creation needs across the borough.

- World Heritage Sites & Buffer Zones ● Hi
- Conservation areas ● Hi
- Areas of Special Local Character ● Low
- Listed buildings ● Hi
- Locally listed buildings ● Med
- LVMF viewing corridor ● Hi
- LVMF wider setting cons area ○ Med
- Extended LVMF wider setting cons area ○ Med
- Local view buffers ○ Med
- Areas characterised by consistent building heights ● Var
- Topographical ● Var



All plans and figures are illustrative.

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