



ENGLISH HERITAGE

Matt Jericho
Principal Planning Policy Officer
Planning Service, Regeneration Directorate
London Borough of Lewisham
5th Floor, Laurence House
1 Catford Road, SE6 5RU

Our ref: HD/P5024
Your ref:
Telephone: 020 7973 3736
Fax:

BY E-MAIL: Matt.Jericho@Lewisham.gov.uk

Date: 6 December 2010

Dear Matt

Core Strategy Submission Version and Sustainability Appraisal October 2010

Thank you for consulting English Heritage on the Core Strategy Submission Version and the associated Sustainability Appraisal (SA). As the government's advisor on all matters relating to the historic environment and a statutory consultee in respect of the Strategic Environmental Assessment of plans, we are pleased to remain involved in the production of this important document for the London Borough of Lewisham.

Our original objections to the Pre-Submission consultation which we sent in April of this year related principally to:

- Inadequate recognition of the historic environment throughout the document, which did not in our view properly reflect the new national guidance contained within Planning Policy Statement 5: Planning for the Historic Environment (PPS5)
- The lack of evidence available to support policies on the historic environment and the approach to tall buildings within the Core Strategy

English Heritage subsequently met with Lewisham Officers which had two outcomes:

- The production of a schedule of agreed changes and areas of remaining disagreement within the Core Strategy
- The production of the Borough-wide Characterisation Study, the aim of which was to better inform the Spatial and Thematic Policies within the Core Strategy.

The attached schedule went some way to addressing our concerns regarding lack of regard to PPS5 and we are therefore concerned as to why the changes that were agreed between English Heritage and Lewisham in the schedule have not been incorporated into the Core Strategy. For example, changes were agreed by Lewisham for Section 2.9, 3.5, 4.8, 4.9, 5, 6, Spatial Policies 3 and 5, Cross cutting and Thematic Policies 15-18.

In light of the fact that many of our previous comments (and the subsequently agreed changes with Lewisham) have not been incorporated into the current version of the Core Strategy, English

1

1 WATERHOUSE SQUARE, 138 – 142 HOLBORN, LONDON, EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available



Heritage has not provided further detailed comments on this document, or the related SA and we refer you to our letter dated 13th April and the schedule dated July 2010 (both of which are attached). We would welcome clarification from Lewisham as to why the changes that we have previously suggest and which in many cases were agreed with by yourselves, have not been made to the Submission Version.

Based on the information provided and the lack of willingness to incorporate the agreed changes we consider the plan to be unsound due to its lack of compliance with national guidance, principally PPS5.

Our second objection to the pre-submission version of the Core Strategy related to the evidence base and we have previously provided comments on the Tall Buildings Study, and sought to assist the borough in the development of your borough-wide characterisation study, the publication of which we welcome. However, in our view the production of an improved evidence base is not in itself sufficient to render the Core Strategy sound, and we are disappointed that the tall buildings study and more importantly, the Core Strategy Spatial and Thematic Policies have not been updated to reflect the findings of the borough-wide characterisation study. We feel that there are also some shortcomings with the borough-wide character study which we set out in brief below.

On the basis of the above, we maintain our challenge to the soundness of the plan in its current form as we do not feel that the evidence base (which we acknowledge is now much improved) has been adequately translated through to the Spatial and Thematic Policies of the Core Strategy, particularly Policies 15, 16, 17 and 18.

Lewisham Borough Wide Character Study Final Report October 2010

English Heritage has been consulted in the early stages of the production of the Borough-Wide character study by providing comments on 13 July and in an email dated 3 September. English Heritage encouraged Lewisham to undertake this study to bolster the work previously done in the Tall Buildings Study, and to address gaps in the evidence base that could help to strengthen policies within the Core Strategy. The final version of the study has now been published and we appreciate that due to the timescales of receiving the final report, it will not have been possible to integrate the findings of the report into the Core Strategy. This is unfortunate and we urge the Council to find opportunities within the forthcoming Examination Process to amend the Core Strategy to reflect the findings of the study, and the changes that we have previously suggested (see above).

In principle, we welcome the character study which provides a good level of baseline information on the character and historic context of the borough. However, given the limited ability for us to influence the study any further, the following comments provide some feedback on the methodology employed and key areas where we feel there are still gaps in the evidence base that should be addressed, if not for the Core Strategy, then for subsequent AAPs.

- The first part of the document enables the reader to understand the historic development of the borough and the character of the residential typologies identified.
- We welcome the elaboration on the historic development section since we last had sight of the document. This information could be used within supporting text to CS Policy CS16 or to inform Section 2 of the Core Strategy which we feel would benefit from a section specifically referring to the historic environment.
- It is unclear to us why the Section on Conservation Areas only considers 11 of the borough's conservation areas. This section is quite useful in drawing out the character of areas with significant concentrations of heritage assets but should cover all 28 conservation areas. It would also be helpful for this section to summarise those conservation areas in the borough that have an up to date Conservation Area Appraisal (CAA) or make recommendations

about the need for updating CAAs, re-assessing CA boundaries and assessing the quality of the CA.

- The various residential building typologies identified go some way to assessing prevailing building heights in the borough, however there is no borough wide map of building heights which we feel would be useful in further developing the borough's approach to tall building development in Core Strategy Policy 18.
- As set out previously, we are a little confused about the way the non-residential typologies have been identified, listing land uses rather than urban form generally, however the mapping is useful in identifying broad locations of these typologies.
- An assessment of strategic and local views is missing from this character assessment.

The second section, 'Lewisham's Places' has most potential value in justifying the Spatial Policy approaches taken in the Core Strategy, however these sub-area assessments are very succinct and do not provide the detailed character assessment as we had hoped they might. For example, the section on Deptford fails to recognise the nationally significant Henrician Scheduled Monument that exists in the Convoys Wharf area, or to identify opportunities for exploiting what remains of Deptford's historic character in future regeneration plans. Also, significantly for the growth and regeneration areas, there is a lack of context as regards the capacity of places to accept higher density development and tall buildings, which was a key reason for undertaking this study.

We draw your attention to the comments provided in our email of 3 September which suggested that the area assessments should consider a similar level of detail to the borough-wide section of the study including heritage assets (including the Greenwich WHS and buffer zone) and also topography, strategic and local views, prevailing building heights, building typologies etc.

To summarise, we feel that the first part of the study usefully addresses some of the gaps in the evidence base, but that the same level of detail has not been replicated in the character areas identified in the latter part of the document. Fundamentally, we would hope that the findings of the study are translated through into the Core Strategy and subsequent DPDs produced by the Council.

We look forward to meeting with you again later this month to discuss the concerns above, and the suite of other documents on which you are currently consulting.

Yours sincerely



Samantha Coates
Regional Planner
LONDON REGION

