

Public Examination of Lewisham Core Strategy Development Plan Document

London Borough of Lewisham Statement on Matter 6 Heritage assets, open spaces and biodiversity

Question: Whether the plan contains adequate protection for the Borough's heritage assets, open spaces and biodiversity?

6.1 The Core Strategy is considered to provide adequate protection of the Borough's heritage assets, open spaces and biodiversity. This is reflected through the plan's vision, strategic objectives and policies which are supported by a sound evidence base.

1. HERITAGE ASSETS

Overview

- 6.2 The overarching approach to heritage assets is set out in the Core Strategy Vision (as recommended to be amended) (**CSD1.1**, Section 4, and **CSD1.5**). The vision states that local and historic character will be at the heart of new design. The Core Strategy Strategic Objectives (**CSD1.1**, Section 5) form the link between the vision and the strategy itself and present the key delivery outcomes that should be achieved. Objective 10 (as recommended to be amended in **CSD1.5**, see page 37 paragraph 5.14) states that Lewisham's distinctive local character, its heritage assets and their settings, and the local rivers and landscapes will be protected.
- 6.3 The Core Strategy in Section 6 sets out five spatial policies with each policy identifying the type and quantity of development acceptable across the borough. The spatial policies are formulated at a general and appropriate level of detail in order to provide a framework for each area of the borough as the Core Strategy is intended to be an over-arching strategic document. However, this does not mean that existing heritage assets or those yet to be identified will in any way be undervalued or their significance reduced in favour of new development in areas where greater change is expected, such as the Regeneration and Growth Areas as set out in Spatial Policy 2 (SP2).
- 6.4 The spatial policies are supported by Core Strategy Policies (CSP) including CSP15 (High quality design for Lewisham), CSP16 Conservation areas, heritage assets and the historic environment), CSP17 (The protected vistas, the London panorama and local views, landmarks and panoramas) and CSP18 (The location of tall buildings). Collectively these policies preserve and enhance the importance of heritage assets across the borough.
- 6.5 Reliance is placed on London Plan policies (**CSD4.1** (which is part of the development plan)) and its draft replacement (**CSD4.2**) to set out an overall strategic design framework that covers built heritage and heritage conservation, the treatment

of World Heritage Sites, the implementation and management of the Strategic Views within the London View Management Framework (LVMF) (**CSD4.7**), tall buildings and density. The Strategic Views that pass through the borough were the subject of intensive assessment in the LVMF and require no further local assessment.

- 6.6 Due to the strategic nature of the Core Strategy which does not provide details of the heritage assets within each spatial area, a significant number of more detailed policies from the Unitary Development Plan (UDP) (**CSD2.1**) are being retained (as outlined in **CSD1.5**) which will provide specific controls in relation to designated and non designated heritage assets. It is the Council's intention to replace these detailed policies in a Development Management Development Plan Document (DPD) which is programmed in the Local Development Scheme.
- 6.7 An extensive evidence base has been prepared to support the Core Strategy policies. (**CSD3.30 to 3.39**). This evidence base will also be used to support more detailed policies in the Development Management DPD. Updating the Local List and identifying other non-designated heritage assets (**CSD3.35**) is a large and ongoing project, and in the meantime these assets will continue to be protected by saved UDP policy URB20 (**CSD2.1**).

Core Strategy Spatial Policies

- 6.8 The way heritage assets are protected in each of the defined spatial policy areas is discussed below.
- 6.9 Core Strategy Spatial Policy 2 (SP2) provides for Regeneration and Growth Areas where the majority of the borough's new housing, retail and employment uses will be focused. SP2 is supported by the Strategic Site Allocation (SSA) policies in Chapter 8 (**CSD1.1**) which sets out regeneration plans for four large sites located in the Deptford New Cross area and one within Lewisham Town Centre.
- 6.10 The Regeneration and Growth Areas have a number of character areas and heritage assets within it which are not overridden by the policy's aims for major regeneration. The finer grain of this character is presented in the Lewisham Borough Wide Character Study (**CSD3.30**) and the Lewisham Tall Buildings Study (**CSD3.31**) discusses the development that might occur in more detail.
- 6.11 There are a number of conservation areas within the Regeneration and Growth Areas. Of particular note is Deptford Town Centre where development is intended to enhance the High Street and preserve its character and vitality. The Deptford High Street Conservation Area is currently being reviewed and a new conservation area nearby at Deptford Creekside is being considered. Associated management proposals to conserve their character will be part of that process. A draft will be made available for public consultation in 2011.
- 6.12 Lewisham and Catford town centres will be the subject of forthcoming Area Action Plans which will set out in detail the aims and objectives for new development and will describe in further detail the heritage assets to be protected and enhanced.

Preparation will draw on the Borough Wide Characterisation Study (**CSD3.30**), Tall Buildings Study (**CSD3.31**) and conservation area appraisals (**CSD3.33**).

- 6.13 The Core Strategy strategic site allocations (**CSD1.1**, Section 8) in Deptford and New Cross are currently industrial, characterised by relatively modern industrial and warehousing buildings, yards and open sheds. These sites are the location of various heritage assets and are considered as key elements in an overarching Strategic Site Allocation policy (SSA1) and the individual site policies (SSA2 to 6). Further details can also be found in the Tall Buildings Study (**CSD3.31**).
- 6.14 The site policy for Convoys Wharf (SSA2) for makes extensive reference to the heritage features of this site and states that these will be key features of any scheme and will be incorporated into a Masterplan.
- 6.15 The site at Surrey Canal Triangle (SSA3) is centred around Millwall Football Club and will involve the redevelopment of a number of relatively modern industrial areas with few features that could be identified as an asset apart from older warehouse buildings in the southern part of the site. The potential heritage value of these are discussed in the Lewisham Tall Buildings Study (**CSD3.31**, page 80). The intention of development will be to create a new 'destination' that will enhance the functioning of the community asset represented by the football club and associated sports facilities.
- 6.16 The site policies for Oxestalls Road (SSA4) and Plough Way (SSA5) recognise the historic route of the former Surrey Canal and aim to reinstate this as a central feature of both sites.
- 6.17 The site allocation at Lewisham Gateway (SSA6) is centred around a traffic island and transport interchange. The aim of this development will be to create a new asset around the confluence of the rivers Ravensbourne and Quaggy. St. Stephen's Conservation Area is adjacent to the site and the importance of protecting its setting is taken account of in the policy.
- 6.18 The UDP policy URB 24 Thames Policy Area (**CSD 2.1, 2.2**) will continue to be saved pending the production of a Development Management DPD. URB24 provides detailed requirements in respect of all heritage features associated with the river. This is of special relevance to Convoys Wharf (**CSD1.1**, SSA2) and other localities within the Regeneration and Growth Areas as defined on the UDP Proposals Map (**CSD2.2**).
- 6.19 Core Strategy policy SP3 provides a policy for four District Hubs focused on a district town centre. Three of these town centres currently have Conservation Area status (Blackheath, Forest Hill and Sydenham) and the policy has been tailored for each of these centres to capitalise on their unique character. Blackheath Village Town Centre and the surrounding open space and residential areas are located within a Conservation Area. The Forest Hill Conservation Area was recently reviewed (2009) and in the case of Sydenham, the Conservation Area has recently been extended to protect significant parades in Sydenham High Street.

- 6.20 Core Strategy policy SP4 provides a policy for three local hubs which are considered to have the potential for development due to the availability of sites. SP4 is considered to act in a similar way to protect heritage assets and to ensure any assets continue to provide a central vibrant and valued role in these centres.
- 6.21 Core Strategy policy SP5 applies to those areas of the borough defined as Areas of Stability and Managed Change and is primarily characterised by the large residential areas of the borough many of which are high quality and much of which is designated as Conservation Areas. SP5 aims to ensure that new development supports and protects the existing valuable character of all residential areas and is of an appropriate size to its context.

Core Strategy thematic and cross cutting policies

- 6.22 The Spatial Policies are supported by four policies which apply across the borough and provide specific detail on key issues.
- CSP15 summarises the design aims for each spatial policy area and provides a general list of those features, including heritage assets considered to be of value, the aims to be achieved and the key features development should seek to enhance.
 - CSP16 provides a specific policy for conservation areas, heritage assets and the historic environment and seeks to ensure that the borough's heritage assets are central to its regeneration.
 - CSP17 looks at the protection of vistas, the London panorama and local views, landmarks and panoramas.
 - CSP18 provides criteria and a policy framework for the location and design of tall buildings.
- 6.23 This approach is considered adequate to protect the borough's heritage assets in light of the overall framework of saved UDP policies, the London Plan and the detailed work in the Lewisham Borough Wide Character Study (**CSD3.30**). This document identifies character across the borough, and the particular heritage assets to be protected in terms of townscape and the character of the built environment. It also identifies issues and potential changes that could be detrimental to this character.

Local Views and Landmarks

- 6.24 The Local Views and Landmarks have been reviewed in detail and assessed in the Lewisham Tall Buildings Study (**CSD3.31**) and will be shown on the Proposals Map.

Maritime Greenwich World Heritage Site

- 6.23 The Council has acknowledged that references to the Maritime Greenwich World Heritage Site were insufficient in the Core Strategy Proposed Submission Version (**CSD2.27**) and has proposed a number of amendments (**CSD1.5**) in response to representations made by English Heritage (**CSD1.19**). It is considered that the amended references to the Maritime Greenwich World Heritage Site and the buffer zone that falls within the London Borough of Lewisham will be appropriate to

adequately protect the World Heritage Site in the context of the overlapping protective designations of the World Heritage Site Buffer Zone within Lewisham.

- 6.24 The area of the Buffer Zone is also located within the Blackheath Conservation Area, which will continue to be protected by the Core Strategy. The core of this Conservation Area focuses on the wide open heath which for the most part also comprises the World Heritage Site Buffer Zone. In March 2007 the Council adopted a combined character appraisal and supplementary planning document (SPD) for the conservation area (**CSD3.33**).

Conformity with PPS5 and English Heritage representations

- 6.25 The Core Strategy policies on the Borough's heritage assets were initially prepared in conformity with PPS15 (**CSD5.8**) and PPS16 (**CSD5.8a**) and predated PPS5 (**CSD5.4a**). Following its publication and representations from English Heritage (**CSD1.9**) appropriate amendments (**CSD1.5**) have been made to the Core Strategy to ensure conformity with PPS5.
- 6.26 Further amendments were subsequently requested by English Heritage, and in response, the Council and English Heritage are preparing a Statement of Common Ground to address the outstanding issues raised in their representation. This will be submitted to the Inspector on 14th January 2010.

2. OPEN SPACES AND BIODIVERSITY

- 6.27 The importance and protection of the borough's open space and biodiversity is a central theme of the Core Strategy (**CSD1.1**). The issue runs throughout the plan and is identified in Section 2 as an important asset that should be protected and it forms part of the drivers for change in Section 3. The Core Strategy Vision in Section 4 emphasises its provision and protection and its multi-faceted role including recreation, sport, leisure and urban food growing.
- 6.28 Section 4 of the Core Strategy provides the plan's strategic objectives. Objective 7 (Open spaces and environmental assets) states the Council will protect and capitalise on the important environmental ecological and biodiversity features of Lewisham. This will be done in order to promote health and well-being through the protection and improvement of a range of open space typologies, enhancement of existing and new urban greenery, natural habitats and biodiversity, requiring green roofs and walls, safeguarding public access and specific reference to the borough's open space network.
- 6.29 Objective 7 is further developed in Section 6 through Spatial Policy 1 (SP1) the overarching policy for the Core Strategy. SP1 states in part that '*Open space, including Metropolitan Open Land (MOL) and Sites of Nature Conservation Importance (SINC) will be protected and a net gain of open space across the borough will be sought, particularly through on-site provision*'. SP1 was amended (**CSD1.5**) in response to a representation received from the Grove Park Community Group (**CSD1.9**).

- 6.30 In delivering the strategic objectives for each spatial policy (SP2, SP3, SP4, SP5) , the plan is clear in stating how open space and biodiversity will be protected, managed and enhanced. This theme is further developed in Core Strategy Policy 12 (CSP12) which sets out how the Council will continue to protect all open space from inappropriate development, designate and protect sites for nature conservation importance, and provide open space and nature conservation areas where there are deficiencies through on site and off site provision in new development. This will maintain and enhance the quality, usability, safety and accessibility of all Metropolitan Open Land (MOL), Sites of Importance to Nature Conservation (SINC), public open spaces, urban green space and green corridors, and provide opportunities for people to experience and enjoy natural habitats and landscapes.
- 6.31 An amendment to CSP12 has been recommended (**CSD 1.5**) that sets out a new part 2a which further emphasises and strengthens the Council's intention to protect the character and amenity of open spaces as well as the impact of development outside their boundaries.
- 6.32 The plan's spatial strategy and supporting policies are considered sound and appropriate and are based on a robust evidence base as set out in the Lewisham Leisure and Open Space Study (**CSD 3.8**). This details the assessment of open space, its characteristics and designations in the borough in accordance with Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (**CSD5.14**). The study identified the quantity, quality and access of open space and its catchment as well as deficiency areas. The study recognised that with the projected population growth an additional 63.55 hectares of open space would be needed over the plan period to maintain the current level of provision per 1,000 population. As this was considered an unrealistic target in a dense urban area, the Core Strategy sets out to improve the quality, accessibility and connectivity of existing open spaces so that they are more attractive and multi-functional in their use, as well as seeking appropriate on-site provision.
- 6.33 The Council's Annual Monitoring Report (AMR) (**CSD2.8a**) shows there has not been any substantial losses of public open space between 2004 and 2010. The Council has also been successful in delivering good quality open space. Twelve parks in Lewisham have been awarded a Green Flag in 2010, which is more than any other South London Borough. Two Green Pennants Awards were received to recognise high quality green spaces managed by voluntary and community groups. Lewisham is also identified as the fourth highest London Borough in terms of the country's best green spaces after the City of Westminster (20), Haringey and Hillingdon (16).