

**London Borough of Lewisham/English Heritage Statement of Common Ground
13th January 2011**

LB Lewisham agree with the changes you proposed in your email of Wednesday 12 December apart from the following matters:

Schedule 2

PAGE 31 (34) Core Strategy Vision, Paragraph 4.8

Propose including the following as the first sentence in Paragraph 4.8.

'Across the borough, the social, cultural, economic and environmental benefits of its heritage assets will be used to facilitate and inform place making.'

[English Heritage Response – 27th January 2011](#)

Agree with the proposed amended wording for paragraph 4.8.

PAGE 55 (61) Section 4C Para 6.71 – 7.75 (6.72 – 6.77)

LBL is proposing an alternative wording to that suggested in the email because the current wording relates to the impact of the building on all features that could be potentially sensitive, which includes the significance of heritage assets. The alternative wording proposed is

'Subject to the detailed considerations set out in Policy 18, the Lewisham and Catford town centres, and the Strategic Site Allocations may be considered appropriate for the location of tall buildings where they are of the highest design quality, improve and add coherence to the skyline, and do not cause harm to the surrounding environment, including the significance of heritage assets.'

[English Heritage Response – 27th January 2011](#)

Agree with the proposed amended wording for paragraph 6.75.

PAGE 91-92 Core Strategy Policy 8 – Clause 5

Include the following as an additional paragraph after paragraph 7.64 in the 'Policy Justification'.

'Planning Policy Statement 5 - Planning for the Historic Environment (PPS5) Policy HE1 and associated English Heritage Guidance will be used to assess issues relating to heritage assets and climate change. The Council will also prepare more detailed local policy to address this issue in the forthcoming Development Plan Documents. Guidance is also contained in the London Plan Sustainable Design and Construction Supplementary Planning Document.'

[English Heritage Response – 27th January 2011](#)

Agree with the proposed additional paragraph after paragraph 7.64.

PAGE 114 (16) Core Strategy Policy 15

LBL proposes an amendment to the wording suggested by English Heritage in order to bring it into line with the wording proposed for Section 4C above as follows:

'New developments in Lewisham and Catford town centres should result in a radical upgrading of the social and physical environment, and tall buildings of the highest design quality may be appropriate where they improve and add coherence to the skyline, and do not cause harm to the surrounding environment, including the significance of heritage assets.'

English Heritage Response – 27th January 2011

Agree with the proposed amended wording for Core Strategy Policy 15 Clause 3c. We would also advise that Clause 1f should be further amended by replacing the word 'protect' with 'conserve', so that it reflects closely PPS5 terminology and principles. Clause 1f should therefore read as follows:

'Ensure and development ~~protects~~conserves and enhances the borough's heritage assets, significance and their settings such as conservation areas, listed buildings, Registered Parks and Gardens, Scheduled Monuments and Maritime Greenwich World Heritage Site.'

PAGE 117 (131)Core Strategy Policy 18

Clause 1

LBL Agree English Heritage's change

Clause 2

LBL do not agree English heritage's proposed change and propose an alternative wording as follows:

2. Tall buildings elsewhere in the borough will generally be considered inappropriate unless they meet the aims identified in the Core Strategy Spatial Policies, and satisfy the methodology set out in the Lewisham Tall Buildings Study and the CABE/English Heritage Guidance on Tall Buildings.

LBL Comment

LBL considers that the Tall building Study which is a Stage 1 Study was prepared in order to ensure that the Strategic Site Allocations and Lewisham and Catford Town Centres which will be the subject of Area Action Plans could be potentially suitable for tall buildings in the schemes which could be proposed for these sites, and therefore to ensure the deliverability of the Core Strategy.

The borough's intention is to use the methodology outlined in the Lewisham Tall Buildings Study to judge the acceptability of proposals for tall buildings elsewhere in the borough, and that further evidence will be prepared to cover the whole borough in order to support a Development Management Document which will provide more

detailed policies than the Core Strategy. The Council also considers that the Spatial policies for the regeneration areas in the borough provide an appropriate general framework for the type of development that will be acceptable in each regeneration area.

It is not considered necessary to repeat the methodology put forward in the Tall Buildings Study which uses CUBE and English Heritage Guidance within the justification of the policy.

English Heritage Response – 27th January 2011

Retaining Clause 2 as proposed by LBL undermines the purpose of Policy 18 of providing a strategic framework in which to manage proposals for tall buildings and directing them towards appropriate locations within the Borough. Clause 1 provides clarity based upon prepared evidence where tall buildings will be encouraged to be located, subject to further detailed analysis. To then include a second clause that considers the rest of the Borough as still potentially acceptable for tall buildings undermines the purpose of the Core Strategy in providing a strategic plan-led approach to the management of this form of development. If it is the aspiration of LBL to encourage tall buildings elsewhere in the Borough outside of those areas already identified, then these should be highlighted at the Core Strategy level, referenced in Clause 1 and supported by clear robust evidence that justifies their appropriateness.

Clause 3

LBL Do not agree all the English Heritage proposed changes and propose the following alternative wording:

'Tall buildings will be considered inappropriate where they would cause unacceptable harm to the identified qualities and significance of the heritage assets and landscape features listed below.'

LBL Comment:

LBL considers that the proposed wording of unacceptable harm is appropriate in consideration of the fact that any tall building proposal is likely to have some impact on sensitive features and it is a matter of judgement as to when this impact becomes unacceptable.

English Heritage Response – 27th January 2011

The inclusion of 'unacceptable harm' implies that a degree of harm could be acceptable. This is contrary to PPS5 Policy HE9 which states a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage assets the greater the presumption in favour of its conservation should be. Significance can be harmed or lost through alterations or destruction of the heritage asset or development within its setting. The PPS continues to state the need for clear and convincing justification where substantial harm occurs. In the case of grade II listed buildings and Registered Parks and Gardens this should be exceptional, whilst for heritage assets of the highest significance this should be wholly exceptional. Further tests are set out which local planning authorities should

use to demonstrate support for developments that lead to substantial harm. The concern is that the policy wording does not provide clarity on when harm to an identified quality or heritage asset would be acceptable. The result is that the wording of Clause 3 as proposed by LBL is too ambiguous with regards to conservation of the historic environment and not in line with PPS5.

Para 7.174 Policy Justification for Core Strategy Policy 18

LBL proposes the following wording for this paragraph:

The World Heritage Site of Maritime Greenwich is also relevant to the location of tall buildings within the borough as sites along the river within Lewisham have been identified as being potentially sensitive to tall buildings in a document prepared by the World Heritage Site Coordinator. The Maritime Greenwich World Heritage Site Buffer Zone will be considered inappropriate for the location of tall buildings.

English Heritage Response – 27th January 2011

Agree with the proposed amended wording for paragraph 7.174.