

LEWISHAM CHARACTERISATION STUDY – RESPONSES TO THE CHARACTERISATION Consultation Report - June 2019

Introduction to the Characterisation

Allies and Morrison Urban Practitioners was commissioned by the Council in February 2018 to prepare the Lewisham Characterisation Study. The study updates the previous 2010 Characterisation Study and responds to the growth and change in the borough since this time.

The Lewisham Characterisation Study sets 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.

Much of the study contains objective, expert evidence about the borough's character and growth. Through its evolution, the study has also involved a number of engagement events with stakeholders. The feedback received shaped the material within this study. Consultation provided residents and other stakeholders with opportunities to discuss and reflect on their experiences of Lewisham: about how the borough has changed over time; reflections on the development of Lewisham and their memories of living here; the nature of places, neighbourhoods and communities in the borough; and current challenges and future opportunities for the borough.

The study's aim is to define an approach to growth for different parts of the borough, taking a borough wide view to inform a future direction for the borough. It will support preparation of the Council's new Local Plan as an evidence base document and be used to inform a character and place-based approach to managing growth in the borough. Similarly, neighbourhood forums will be able to draw on this study to assist with the preparation of their neighbourhood plans. The report will also inform decisions made by Council officers and should be an important tool used by developers and others investing in Lewisham to ensure proposals positively respond to the local context.

This consultation report

The purpose of the formal consultation which took place between 25 March and 23 April 2019 was to gather a wide range of views and opinions on the themes raised within the characterisation to help inform the direction of the Local Plan. All responses received have been carefully reviewed and changes of accuracy and clarity have been reflected within a final version of the Characterisation Study.

This 'Responses to the Characterisation' report has been prepared to summarise the views, ideas and opinions submitted about the Characterisation Report. These views will help inform the direction of the Local Plan which will follow a similar place-based approach that developed through the Characterisation report.

The comments received relate to each of the five sub areas: northern, central, southern, eastern and western; alongside comments relating to the borough wide approach to growth and change. The following report replicates this structure and includes a summary of the comments made, records the emphasis on particularly popular themes or concerns, which are illustrated by a series of key quotes.

Borough wide

The Characterisation report sets out a series of borough wide growth themes which the consultation asked about. Generally, comments were supportive of the five sub areas that are set out within the Characterisation report. A number of respondents highlighted that it is important to acknowledge the blurred and permeable boundaries between these areas and be sensitive to them when drafting future policy. This was felt to be particularly important between Telegraph Hill and New Cross which are

currently shown in separate sub-areas. Comments highlighted that future proposals should accept that people live, shop and work across and between them. One respondent suggested that perhaps there should be a use of a buffer zone to acknowledge the overlap between areas and for some areas there should be joint policies or working groups that operate across boundaries.

Other comments related to the emphasis on particular growth themes. One comment stated that the 'Reinforce, Re-examine or Reimagine approach' is appealing but raised concern about the burden this places on the areas to be 'reimagined'. Their concern is there has not yet been successful change in places like Lewisham and that the development has been piecemeal. Others were concerned about over development within the designated Lewisham, Catford and New Cross Opportunity Area in terms of density, overloading of infrastructure and an impact on the character of adjacent conservation areas. A number of comments were supportive of the proposals to focus intensification along key corridors but felt they this must be sensitively managed to ensure places do not merge in character, or hinder the movement of public transport. Generally comments were concerned about the number of new tall buildings in the borough and one comment was made in support of the Council developing a new tall buildings study to review the guidelines and definition of 'very tall'. There was also concern that these tall buildings were not delivering affordable homes.

A significant majority of the comments made about the borough wide section focused on green space and were supportive of the current emphasis and theme to strengthen green and blue infrastructure. Concerns included the feeling that new development is overshadowing green spaces; the impact of pollution on air quality; the link between wellbeing and green space; and the impact of the overuse of the existing spaces. Many comments also acknowledged the importance of the role of the borough's green spaces and tree canopy within viewing corridors and the link between topography and open space as part of local character. Although respondents were supportive of the narrative to protect the long views of central London, the views south and east, both into and across the borough, were also felt to be key in terms of protecting the borough's identity.

One comment suggested that large parts of the borough has insufficient large green spaces within easy walking distance and therefore the role of smaller spaces should also be acknowledged. Another comment was made in support of protecting private green space as well as public green space. The respondent felt that allotments and private gardens should be better protected within policy given the significant impact they were felt to have on the borough's character, biodiversity, pollution mitigation and tree provision.

Other comments focused on heritage and conservation. It was felt that the conclusions should more strongly express the importance of conservation areas - and the rigorous application (and enforcement) of conservation policies - in preserving the valuable character and features identified in the study. Other comments highlighted the negative impact on the borough from the flight paths from City and Heathrow airports.

A selection of comments about borough wide themes:

"I support the idea of breaking down the borough into sub-areas representing the neighbourhoods that local residents feel they recognize. I broadly support the five sub-areas specified, a convincing case has been made for this split."

"It is important that the designation of Lewisham, Catford and New Cross opportunity areas covering just 20-25% of the area of the borough does not lead to over-development of those areas"

"The intensification of the borough's corridors is a sensible sounding proposition but needs to be applied sensitively and carefully to avoid creation of (a) ribbon developments that destroy the separate character of local areas by merging them"

"It is important that major adjacent developments do not degrade the existing limited resources of green and blue space by overbearing/overshadowing them and adding noise and pollution"

Northern area

(Deptford, North Deptford and New Cross)

Comments about the northern area generally focused on the need for investment in green spaces and social services to support an increasing population and the positive regeneration of the area. Comments included a support for new green spaces within development and opportunities to increase access to green space that already exists within estates. To help overcome the barriers created by infrastructure and traffic comments suggested that there should be greater investment in the quality of public realm and cycle infrastructure to encourage walking, strengthen a feeling of connectivity and improve the environment for cyclists. Comments were also made about the centre of New Cross and the negative impact of new development on the existing character and traffic.

Comments were supportive about the idea of a new/improved centre at Evelyn Street. There was a desire for better social infrastructure to be delivered alongside new homes including social services, new sports facilities and shops. There was support for the emphasis on workspace within the sub-area.

One response highlighted that none of the landmarks in this northern area of the borough are protected by the Core Strategy Policy. The comment felt that this should be reviewed so that there was a fair spatial representation.

Several comments also raised a concern about the strong relationship between Telegraph Hill and New Cross and that the way these areas had been split presented challenges. Please see comments on the Western Sub-area below for a more detailed summary of these responses.

A selection of comments about this sub area:

"Retain as much green space as possible. In fact, increase it. Stop chopping trees down. Be serious about climate change"

"Lack of links between roads/parks and schools to encourage people to walk or cycle avoiding the very busy and polluted roads like Evelyn Street"

"Completely agree with the need for a 'centre' for the north park of the borough"

Central area

(Lewisham, Catford and Hither Green)

The primary comments about the central area relate to a concern about the impact of new and consented development on the existing centres, particularly in Lewisham. A number of comments felt that development coming forward in the central area is not sensitive or proportionate.

Comments highlighted that recent development was felt to be out of character with the existing place, too dense and tall. One comment highlighted a concern about the enclosure of the central river valley

with continuous tall development and the idea that intensification along the entire central corridor would dilute the sense of place. Other concerns about new development included the negative impact on local landmarks, a concern about congestion on the bus routes and an increase in traffic.

Comments supported the improvements to the station at Lewisham to serve new development but were concerned about the high levels of intensification which were being delivered alongside this. It was felt further investment in the transport infrastructure was required to justify further development. Investment in other social infrastructure and assets such as Lewisham market were felt to be needed given the amount of S106/CIL that it was believed had been collected from developments.

Several comments were made in support of the redevelopment of the shopping centre in Lewisham, to help improve shops and services. A couple of comments suggested that the library and other community uses should be in the centre and could replace the shopping centre. However, there was also concern raised about the designation of Lewisham as a Metropolitan centre. Respondents wanted to better understand what the designation would mean in practice and how it will impact the town centre as a place.

Comments were supportive of the opportunities identified for greening and traffic calming, particularly through the central spine from Lewisham to Catford. There was also support for rebalancing the environment in streets towards pedestrians and cyclists, not traffic.

A selection of comments about this sub area:

"Making Lewisham to Catford one corridor makes neither place have its own personality"

"The borough's attitude to 'very tall' buildings needs to be reviewed as developers press for a step-change in height and density."

"The historic character of the area has indeed been significantly altered more recently (over the past 8-10 years) with the development of high-density housing around Lewisham town centre. Many local residents would argue that this has not been altogether for the better. There are positives, like more homes, the improvement of Cornmill Gardens and the Ravensbourne, and the opening of Glassmills Leisure Centre."

"The lack of council/community facilities in the centre of Lewisham is disappointing, given the Council's aspirations for a Metropolitan Centre"

"The main library (earmarked for redevelopment) is slightly out of the centre, when it should be at the heart of the community. The opportunity to re-locate it to Gateway, near the transport hub and Glassmills Leisure Centre, has been missed. Perhaps it should become the centerpiece of a redeveloped Lewisham Shopping Centre"

"Bus stops are now harder to access from the railway station. The cycle route is worse..well non existent, you can't cycle through the station roads but are forced round a very confusing road network"

Southern area

(Downham, Bellingham and Bell Green)

There were far fewer comments received on the Southern area than the other sub-areas within the borough. The only comments received were in support of the redevelopment and regeneration of the Bell Green area, alongside investment in transport infrastructure. A number of comments suggested that there should be a new Bakerloo Line station here to secure transformational change on this significant site. More targeted consultation in this area might be required to secure feedback on the ideas and growth proposed for this sub-area.

Key comment about this sub area:

"Coordinated redevelopment of the Bell Green presents a major opportunity to improve the physical, social and economic environment in this neglected outpost of the Borough"

Eastern area

(Blackheath, Lee and Grove Park)

Comments on the eastern area were focused on three locations within this sub-area. A number of comments were made in support of further investment in social facilities in Grove Park – comments particularly referenced the protection of the Youth Club. Comments were also made in support of the protection of heritage assets in the area.

Lee Green was an area referenced by a number of respondents who were supportive of the redevelopment and investment in this area of the borough, but many were concerned about the impact on traffic and congestion.

There were several comments received in support of the document in highlighting the special and varied character of Blackheath – the heath, village and residential fringe. Concerns included pollution in Blackheath centre, the pressure on the historic centre from tourists, a desire to maintain a varied centre in terms of uses in a changing retail context; and the issue of poor refuse collection. Comments were made in support of parking and traffic management and improvements to the public realm in the town centre. References were also made to the importance of views out of the borough, across the boundary into Greenwich, as an important part of Lewisham's character.

A selection of comments about this sub area:

"Please place Grove Park Youth Club on the local list of protected buildings...It is a landmark heritage asset and an vital space in a community which is really lacking in spaces in which they can congregate and build social networks"

"It's a good idea to develop the area around Lee Green, however there is little room for making the Brownhill Road section of the A205 any narrower, as this would lead to an increased incidence of traffic jam"

"The three varied and complementary characters of the Heath, the Village, and the Residential Fringe in Blackheath. It is the variety and contrast that makes this area so attractive, for visitors and tourists as well as residents. This needs to be protected, celebrated and (where possible) enhanced."

Western area

(Telegraph Hill, Brockley, Ladywell, Crofton Park, Honor Oak, Blythe Hill, Forest Hill, Sydenham and Sydenham Hill)

Many comments about the western area were in support of its green spaces, views and topography as an important part of the character of the sub-area. Comments supported the theme to better celebrate the woodland legacy of the area. Comments were also made in support of the Brockley Three Peaks walking route and in support for greening of key routes/corridors and the protection of existing street trees.

A small number of responses raised a concern about new development impacting on a natural skyline. There was support for contextual development but not buildings of significant height.

Comments referenced the need to reconcile the suggested intensification of key corridors with improvements to what is considered by consultees to be a currently poor quality and cluttered street environment. Other comments relating to infrastructure and transport referenced issues of traffic congestion, the negative impact of the South Circular, support for improvements to Forest Hill station and better bus routes.

In the town centres, particularly in Forest Hill, there was support for investment in social infrastructure and support for creative industries, perhaps through the re-use of empty shops for business space.

A number of comments raised a concern about the difficulty in classifying the best fit for the Telegraph Hill neighbourhood. Comments acknowledged the need for a blurred boundary between northern and western areas at Telegraph Hill and that this neighbourhood is part of both sub-areas. Comments highlighted that Telegraph Hill uses the services of New Cross in terms of transport and shopping and its historic evolution points to it being part of this area. A number of comments were keen to stress the impact that any future redevelopment of Sainsburys and other sites within New Cross would have on the Telegraph Hill area and the conservation areas there.

Comments about Telegraph Hill itself included a support for the stronger protection and preservation of the original buildings within conservation areas. Other concerns included the impact of rat running traffic on conservation areas, the impact of the barriers of the A2 and the railway lines, and concern about the pressure on public transport at New Cross from new development.

A selection of comments about this sub area:

"The identified opportunity for intensification on Brockley Road should be reconciled with the existing problem of it being a poor quality and cluttered street overly dominated by cars"

"The pollution from the South Circular in particular needs dense green areas to consume the higher levels than normal of CO2 and the protection of all green spaces is vital to the health of the area and its residents"

"Telegraph Hill is very much an individual community"

"I think the Telegraph Hill areas should be in the Northern sector, not Western. The character of T Hill is more similar to other areas in the northern sector and the development in this area will impact upon Telegraph Hill significantly"

"It would be helpful to feel and see a commitment that the proposals will consider the area as a whole"

"Better bus routes - this area is very dependent on the overground and Forest hill station-when there is a problem with either"

Conclusion

The views in this report are a summary of the feedback received on Characterisation Report. Comments have been carefully reviewed and changes of accuracy and clarity have been reflected within a final version of the Characterisation Study (now available online through the Council's website). Other views and ideas will help inform the direction of the Local Plan which will follow a similar place-based approach as has been developed through the Characterisation report. Officers will use the views and emphasis on key themes to help shape emerging policy and guidance within the Local Plan.

The draft Local Plan is currently being prepared and is expected to be published for public consultation in 2020.