

TALL BUILDING REVIEW

BACKGROUND PAPER – JANUARY 2023

Contents

1. Background	page 2
2. Objectives	page 3
3. Definition of a tall building for Lewisham	page 4
4. Tall building suitability zones and maximum heights:	page 5-8
<i>Lewisham Major Centre</i>	<i>page 9-15</i>
<i>North Deptford and Deptford Creekside</i>	<i>page 16-25</i>
<i>New Cross</i>	<i>page 26-31</i>
<i>Catford</i>	<i>page 32-36</i>
<i>Ladywell</i>	<i>page 37-40</i>
<i>Bellingham</i>	<i>page 41-44</i>
<i>Bell Green</i>	<i>page 45-48</i>
<i>Lee Green</i>	<i>page 50-53</i>
5. Conclusion	page 54

1. Background

- 1.1. The Lewisham Tall Building Review (Dec 2022) is an evidence base document that will support the preparation of the new Lewisham Local Plan. The Local Plan, once adopted, will form part of the Council's statutory Development Plan alongside the London Plan (2021) and adopted Neighbourhood Plans.
- 1.2. To support the preparation of the Local Plan the Council commissioned Allies & Morrisons Urban Practitioners, leading experts in this field, to prepare a Tall Building Study published in 2019. This study identified a series of criteria to assess the appropriateness and sensitivity of locating tall buildings within the borough
- 1.3. Following this study the London Plan was formally adopted in March 2021. London Plan Policy D9 (Tall Buildings) directs all London boroughs to identify within Local Plans where tall buildings may be an appropriate form of development and to set parameters for building heights. It states that a tall building may not be defined as less than 18 metres or 6 storeys tall. As a result of this policy direction and to ensure that the Local Plan was consistent with national planning policy and in general conformity with the London Plan the Council decided to carry out further work on this topic.
- 1.4. Allies & Morrison were commissioned to prepare Lewisham's Tall Building Addendum (2022) which identified eight 'search areas' that could accommodate urban intensification in the form of tall buildings in the near future. Within those search areas it defined a series of suitability zones, provided a definition of 'tall' relative to its context and provided maximum parameters in metres and storeys for each of those zones, as required by the adopted London Plan. The purpose of the Addendum was to build on the existing evidence base using the maps of sensitivity-to and suitability-of tall buildings prepared for the Draft Tall Building Study.
- 1.5. The Tall Building Addendum was published for comments in May/June 2022. Many responses from a wide range of parties were received. The consultation reflected the significant interest in the topic of building heights, and the potential impact of tall buildings on the future character of Lewisham.
- 1.6. Following the consultation process Lewisham Council's in-house Urban Design Team undertook to refine the search areas identified in the Tall Building Addendum (2022). An additional level of scrutiny has been applied to the eight search areas, using local planning knowledge and finer-grain urban analysis. The resultant seven remaining search areas have tighter boundaries and rationalised maximum heights. The methodology for this refinement is discussed in further detail in section 4.

2. Objectives

- 2.1. To comply with The London Plan (2021) Policy D9 Tall buildings Parts A and B to eliminate ambiguity regarding the acceptability, definition and location of tall buildings.
- 2.2. To provide a more granular urban analysis into the evidence base to support Policy QD4: Building Heights of Lewisham's emerging Local Plan.
- 2.3. To ensure that tall buildings make a positive contribution to the special character of Lewisham's urban environment by being located in appropriate locations at an acceptable scale. This will enable good growth through a programme of appropriate urban intensification.
- 2.4. To ensure that Lewisham's new Local Plan provides clarity for communities, developers and decision-makers, including Council officers, about the appropriateness of tall buildings in different parts of the borough.

3. Definition of a tall building for Lewisham

- 3.1. The existing definition of a tall building within Lewisham's adopted Local Plan, Policy QD4 of the Core Strategy states that:

“Within Lewisham tall buildings are defined as buildings that cause a significant change to the skyline and which:

- a. Are 30 metres or more in height, except in the designated Thames Policy Area where they are buildings 25 metres or more in height; or*
- b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.*

- 3.2. This definition was carried forward in the Regulation 18 stage draft Local Plan published for consultation in Jan/April 2021.

- 3.3. Officers considered the approach taken within the Tall Building Addendum (2022) where each individual area had a unique definition of 'Tall'. In discussions with the Greater London Authority (GLA), officers concluded that this approach was too complicated, overly prescriptive and was likely to lead to confusion for communities, developers and decision-makers. Officers also considered the representations received during the Regulation 18 consultation and whilst there were a considerable number of comments relating to the overall heights and suitability of tall buildings, there was little discussion about the proposed definition.

- 3.4. As such the Regulation 19 draft Local Plan broadly reverts to the adopted definition and that within the Regulation 18 draft Local Plan. Namely:

Within Lewisham Tall Buildings are defined as buildings which are 10 storeys or 32.8 meters measured from the ground level to the top of the building (including any rooftop equipment), or greater.

- 3.5. The increase in the definition from 30 meters to 32.8 meters (10 storeys) is to take into account requirements within building regulations for increased floor to floor heights per storey.
- 3.6. Part b of the adopted definition is dropped as it does not conform to the London Plan requirement to provide a tangible height.

4. Tall building suitability zones and maximum heights

- 4.1. Following consultation responses on the Tall Building Addendum and in discussion with the GLA, officers reviewed the approach to identifying tall building suitability zones with a view to add a more granular design analysis to support the evidence base.

Methodology

4.2. The Tall Building Addendum identified eight 'search area':

- North Deptford
- New Cross / New Cross Gate
- Deptford
- Lewisham Town Centre
- Lee Green Town Centre
- Catford Town Centre
- Forest Hill Town Centre
- Lower Sydenham / Bell Green

4.3. The maximum heights proposed as suitable within the Addendum for Forest Hill Town Centre and Lower Sydenham / Bell Green were both below 10 storeys and therefore these areas would not be considered suitable locations for tall buildings under the definition outlined above.

4.4. Officers considered this carefully and concluded that these areas should be removed as they were not suitable locations for tall buildings of 10 storeys or above.

4.5. The remaining 'search areas' identified in the Tall Building Addendum have been assessed using a four step process. This process is as follows:

1. Characterise
2. Exclude
3. Analyse emerging character
4. Recommend

Step one: characterise

4.6. Each of the remaining search areas identified within the addendum are formed of either one/two large sites; or multiple smaller sites. The character areas have been grouped together based on similar prevailing townscape character, typologies, or by natural boundaries such as roads and railway lines. Urban analysis has been carried out using site visits, Google-earth street view and 1:10000 maps. This has allowed a detailed characterisation of each of the sites within the wider search areas to be noted and cross referenced.

Step two: exclude

4.7. Using guidance set out in the emerging Local Plan and in-house knowledge of current and historic planning approvals, each character area has been tested for its appropriateness for tall development through a process of

exclusion. Each of the sites meeting one or more of the below criteria has been removed from the suitability zones identified in the Tall Building Addendum. The rationale for their eliminations is as follows:

Designation and Assets:

- 4.8. **Metropolitan Open Land (MOL) or other designated open spaces** . MOL and other designated open spaces play a critical role in providing green infrastructure for Lewisham's communities. As such, they are protected by land-use planning policies and are assessed to be inappropriate for tall buildings.
- 4.9. **Strategic Industrial Land (SIL)**. SIL is assessed to be inappropriate for tall buildings as its protected use supports the regional economy and provides high levels of employment in Lewisham. It has the highest priority of protection in the new Local Plan Table 8.1: Lewisham's Employment Land Hierarchy.
- 4.10. **Heritage Assets**. Conservation Areas and Grade II Listed buildings and structures are designated under the Planning (Listed Building and Conservation) Act 1990. Conservation Areas have been given the highest weight of sensitivity in the first iteration of studies produced by Allies & Morrison. As such, there are no Conservation Areas remaining in the tall building suitability zones. However, some Grade II listed assets have been included. Officers consider that these assets should be excluded, and as per the NPPF, adjacent (tall) development will be required to maximise enhancements and avoid harm to the heritage significance of these assets and their settings.
- 4.11. **Areas of special local character**. Areas of special local character have a particular coherence and shared group value which is unlikely to be preserved or enhanced by tall development. As such, officers consider that it is unlikely that tall buildings will be acceptable in these locations.
- 4.12. **Locally Listed buildings and structures**. Buildings and structures on the local list have been assessed to contribute to the Borough's distinctiveness and sense of place. As such, the demolition of locally listed buildings to provide sites for tall buildings is unlikely to be appropriate. Tall buildings adjacent to locally listed buildings should respond to the significance of the non-designated asset.

Recently developed sites:

- 4.13. These sites are unlikely to come forward for re-development prior to Lewisham's next Local Plan update. As such officers have assessed that they are inappropriate for inclusion in the refined tall building suitability zone. 'Recently developed sites' refers to all sites that have been built-out in the last 10-20 years, regardless of whether the development contains tall buildings.

Endorsed Framework excludes tall development:

- 4.14. Lewisham Council has already procured a series of frameworks and masterplans to identify opportunities for development and intensification in New Cross, Catford, and along the A21. Through a process of rigorous testing, building heights have been recommended within these frameworks. To ensure consistent advice, where one of the following frameworks determines that tall buildings are not appropriate, those sites have been removed from the refined tall building suitability zone:
- 4.15. **New Cross Area Framework (2019)**. The framework sets out a strategy for the location of tall buildings, acknowledging the role they play in good growth. New Cross Road, however, is considered to be an inappropriate location for tall buildings. The framework recommends that the prevailing urban scale and character along this significant road is retained and protected.
- 4.16. **Catford Town Centre Framework (2021)**. The endorsed framework has been developed to guide the regeneration of Catford Town Centre, in line with its designation as a major town centre. The document provides guidance on the location-of and height-for future development. Catford Broadway and Rushey Green are assessed to be inappropriate locations for tall buildings given their relationship to the Gr II Listed Catford Broadway Theatre building, as well as their prevailing high street character.
- 4.17. **A21 Development Framework (2022)**. The A21 Development Framework assesses the development potential of the historic north to south spine which links several centres. Sites directly fronting the A21 in Lewisham, Ladywell, Catford and Bellingham are referenced; with Bellingham being assessed as inappropriate for tall development except at the Ravensbourne Retail Park Site.

Sites currently meeting an essential community need:

- 4.18. These sites include good quality public and private housing. They also include hospitals and health services; schools; and/or any other community infrastructure that supports vulnerable residents. Buildings that fall into this category have been assessed on a site-by-site basis.

Constrained Sites:

4.19. Some sites will not be able to support very tall buildings because they are too small or have poor access. This does not preclude them from development of any kind.

Sensitive or Transition Sites:

4.20. Sites that would cause significant and unavoidable harm to adjacent sensitive areas have been excluded. Officers have assessed these areas on a site-by-site basis, noting where tall development would be particularly inappropriate based on the surrounding context. This includes sites where there is a particularly sensitive Gr II Listed heritage asset nearby, areas of uniform low density/low rise housing, or areas with a distinct coherence or character. The reason for the inclusion in this category is noted in the exclusion table.

Step three: Analyse emerging character

4.21. Following the above process of exclusion, the sites identified as appropriate for tall development as well as those that were excluded because of recent development (where that development includes tall buildings) have been analysed based on current or recent planning applications.

4.22. Sites with extant; granted; and resolution to grant permissions were reviewed to understand the emerging urban character. This has provided insight into the type of future development that will be acceptable on the remaining sites.

4.23. This research has allowed us to build a complete picture of the prevailing and emerging heights unique to each search area. It has also provided a consolidated record of development that has been acceptable in planning terms. All this information, along with the existing evidence base, has been used to inform the maximum acceptable building heights for each newly refined search area.

4.24. Where there is no planning permission in place, but an endorsed framework has been prepared to guide future development, these have been used as a proxy for emerging character. The following three frameworks are relevant:

4.25. **New Cross Area Framework (2019).** The New Cross Area Framework provides analysis of the existing and emerging context before identifying key opportunities for future tall development. The framework proposes that one-off tall buildings of the highest architectural quality may be acceptable to the north of New Cross Road, between the two railway stations.

- 4.26. **Catford Town Centre Framework (2021).** This framework identifies a number of key regeneration sites that are appropriate for development in two broad ranges of up to 16 storeys; and between 17 and 20 storeys. Where tall buildings are assessed to be an appropriate form of urban intensification, mediation between the scale of the existing urban fabric and new tall development is proposed by increased height in the centre of larger regeneration sites, with buildings up to 16 storeys at the perimeters. A range of building heights are suggested in order to create a varied skyline.
- 4.27. **A21 Development Framework (2022).** This framework looks at the A21, which forms a north to south spine through several search areas identified as appropriate for tall buildings including Lewisham, Ladywell, Catford and Bellingham. Within the framework, future building heights for sites directly fronting the A21 are recommended as follows: Lewisham Town Centre up to 20 storeys; University Hospital Lewisham Park and greens (Ladywell) to accept buildings of between 3 and 10 storeys; Rushey Green (Catford) to re-provide existing building heights at max 13 storeys

Step four: Recommend

- 4.28. Following step two (exclude character areas that have been assessed to be inappropriate for tall development); and step three (analyse emerging character based on prevailing townscape character and planning history); a recommendation for future maximum height ranges in each of the remaining search areas have been proposed.
- 4.29. The recommendations are based on the prevailing and emerging urban grain; the future aspirations for each search area as identified in the emerging local plan and Lewisham's ambition to deliver high quality genuinely affordable homes.
- 4.30. Defining maximum heights in each area meets the requirements of the London Plan to remove ambiguity on acceptability of tall development, while at the same time informing Lewisham's vision for good growth.
- 4.31. The recommendations are explained in detail in the tables that follow, and further illustrated in the final refined tall building suitability zone maps for each area.

Lewisham Major Centre

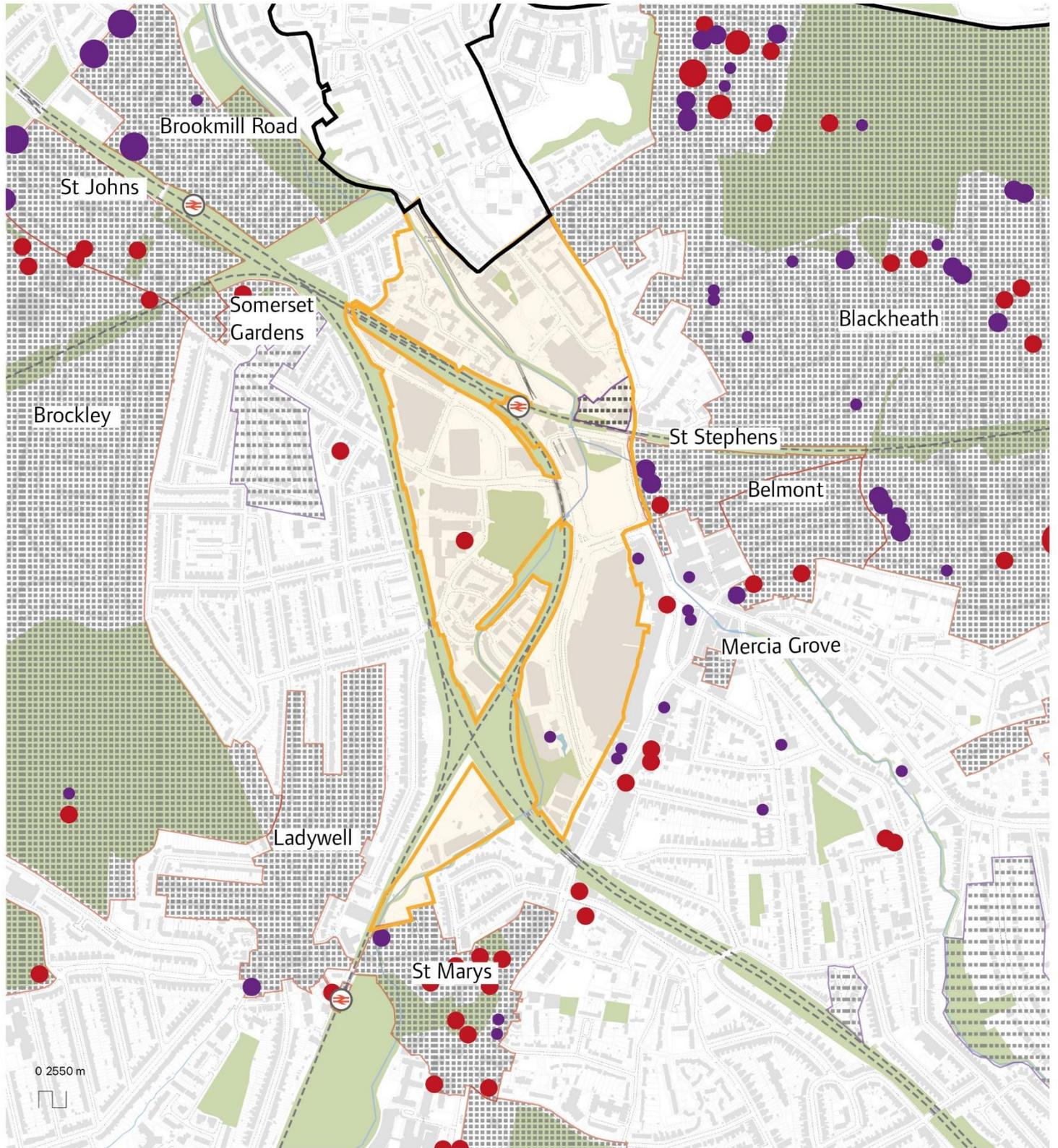
- 4.32. From emerging local plan para 14.2 on describing Lewisham Major Centre's character:
- 4.33. *The character of Lewisham Major Centre and its surrounds is strongly informed by its shopping and leisure destinations, as well as its highly active public places, including the rail interchange and market. It has a distinctive urban character with a tall buildings cluster which is surrounded by lower density residential terraces. Whilst public realm improvements have been delivered through the redevelopment of larger sites over recent years much of the town centre remains fragmented and disconnected from its surrounding neighbourhoods. There remain areas with poorer quality public realm, particularly on Lewisham High Street. There are significant site redevelopment opportunities, including the 1970s built shopping centre and multi-storey car park, which alongside planned public transport improvements, will allow the character of Lewisham to be 'reimagined'.*
- 4.34. Development in the form of tall buildings should therefore seek to consolidate recent development, bringing stronger coherence to the area through distinct tall building zones that respond positively to the existing urban context. This will allow the shopping and leisure facilities, as well as the public places that bring people to the area, to thrive.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character	Step 4: recommend
		Y/N	reason		
L1	Area bordering Blackheath with mixed urban grain including Victorian terraces along Conington Road. New higher density development (The Venson Site) includes Silkworks and adjoining residential blocks forming a courtyard. Orchard Garden Estate, community centre, and local pub Sydney Arms lie to the south	Y	Recently developed	Completed Venson Site scale: up to 10 storeys	
L2	Conington Road brownfield site	N		Site allocation 4 (central area) Extant permission ref: DC/17/101621 under construction: 8, 14 & 34 storey buildings	Consolidate into two zones: max 16 storeys in north towards more sensitive urban areas. max. 35 storeys in south along with other sites which could support a similar scale due to proximity to station and emerging urban grain
L3	Land at Conington Road and Lewisham Road, including current Tesco superstore, car park, and petrol station	N		Site allocation 5 (central area)	
L4	Corner site bordering Tesco comprised of terraced housing of residential and town centre use,	Y	Asset – area of special local character		Tall buildings would significantly harm the

	including handsome Heath Terrace (1834) and Maggie's Café. Pair of semi-detached Victorian homes and small parking lot to the south of Silk Mills Path				coherence of the special local character area
L5	Armoury Road Estate – late 20/early 21 st century housing estate of 2-3 storeys	Y	Essential community need - housing		
L6	Armoury Road bordering rail, including buildings associated with Network Rail		Constrained site		
L7	Thurston Road Bus Station	N		Site allocation 6 (central area)	Group with adjoining sites – max. 35 storeys clustered around station
L8	Recently developed mixed use tower blocks bordered by rail on north and western sides and Jerrard St on east side.	Y	Recently developed	Completed scheme scale: up to 10 storeys	
L9	Lewisham Retail Park	N		Site allocation 7 (central area) Extant permission ref: DC/16/097629 Podium with series of towers up to 23 storeys and tall parapet concealing services	Group with adjoining sites – max. 35 storeys clustered around station
L10	Student Exchange towers, recently developed student housing with Bakerloo terminus for future BLE	Y	Recently developed	Completed scheme scale: up to 34 storeys	
L11	Lewisham Gateway	N		Site allocation 1 (central area) Extant permission ref: DC/06/062375 Under construction: up to 35 storeys	Heart of metropolitan centre, heading towards completion. Max 35 storeys except at corner adjacent Gr II listed St Stephens where transitional max. 16 storeys applies
L12	Mixed use developments to the south of Loampit Vale – adjacent Cornmill Gardens	Y	Recently developed	Completed scheme scale: up to 20 storeys	
L13	Pendergast Vale College including the Grade II listed Lewisham Bridge Primary School, built in 1914. Adjacent Cornmill Gardens and Playground offer important outdoor public amenity, act as a soakaway, and link to the nearby Ravensbourne River with adjoining Metropolitan Open Land	Y	Designated – MOL and Gr II listed		
L14	Elmira Street housing estate - early 21 st C development to the south of Cornmill Gardens	Y	Essential community need - housing		
L15	Silver Road and Axion House	N		Site allocation 9 (central area) Extant Permission DC/18/109972 under construction: up to 16 storeys	

L16	Lewisham Shopping Centre site, excluding existing buildings forming Lewisham High Street	N		Site allocation 2 (central area)	Deep site with constraints arising from existing structure. The site has to form a transition between the northern cluster of tall buildings focused around the station to the existing low rise context of the high street. Could support a cluster of towers up to max.25 storeys focused towards Molesworth Street and to the north of the site.
L17	66 Molesworth St, Riverdale House and adjacent open land. Riverdale House is locally listed for its architectural significance.	Y	Designated – MOL; asset – local list; recently developed	Completed schemes: up to 8 storeys	
L18	Land at Engate Street, excluding the buildings along Lewisham High Street. Three warehouse style buildings/workshops including a Royal Mail Depot; with access to the River Ravensbourne and Waterlink Way	Y	Sensitive/ transition site – adjacent to MOL and locally listed buildings of medium height	Partially included in site allocation 3 (central area)	Sensitive transitional zone adjacent to MOL and locally listed building. Tall buildings not appropriate
L19	Triangular site used as a depot adjacent to River Ravensbourne. Bounded by railway lines on north-east/ north-west sides	N			Separated from metropolitan centre, therefore consideration for adj. residential areas applies – max 16 storeys
L20	Church Grove self-build site under construction	Y	Under construction extant permission ref: DC/20/119250		Construction proceeding without tall buildings

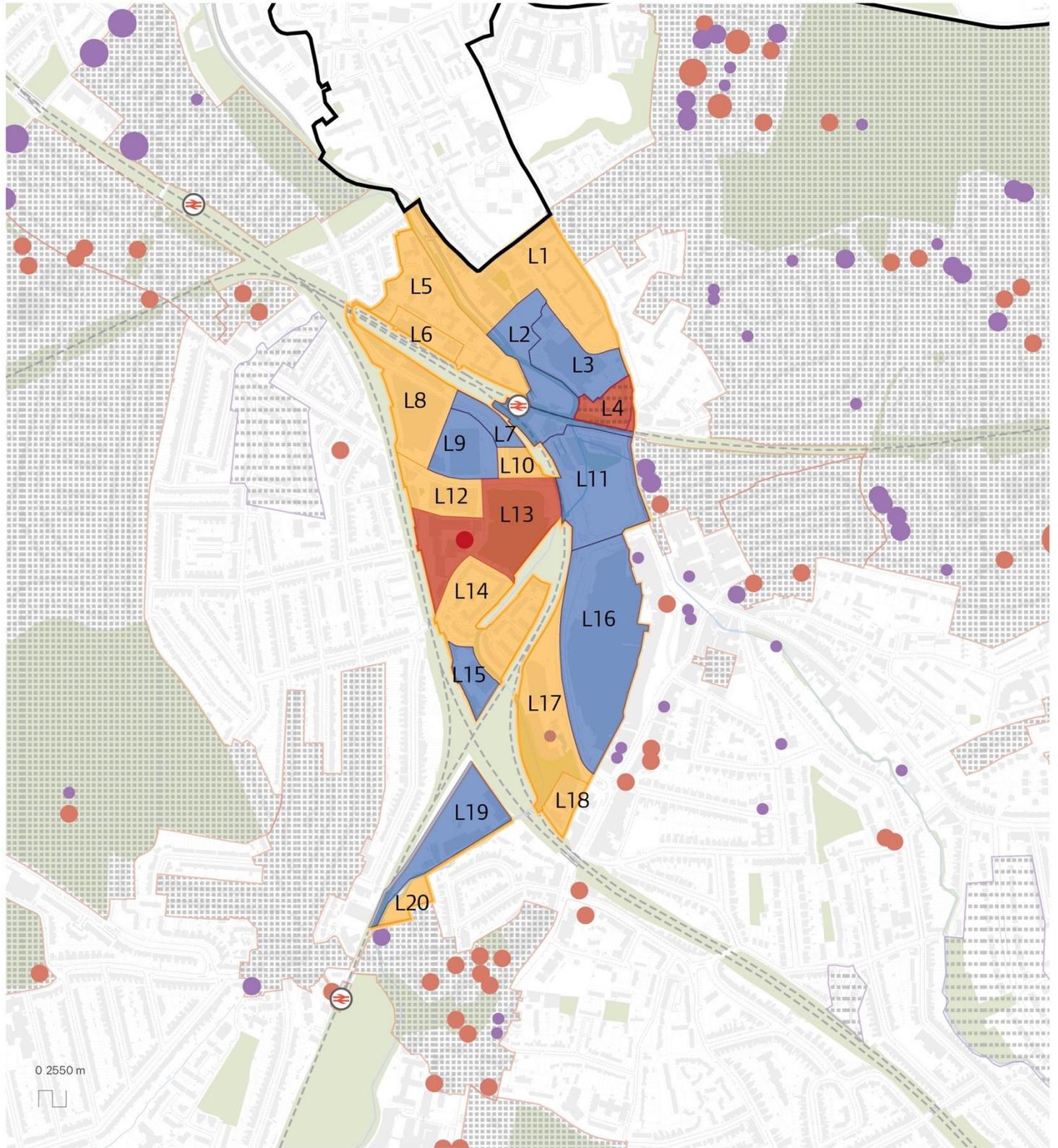
LEWISHAM TOWN CENTRE - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset
-  Lewisham Borough Boundary

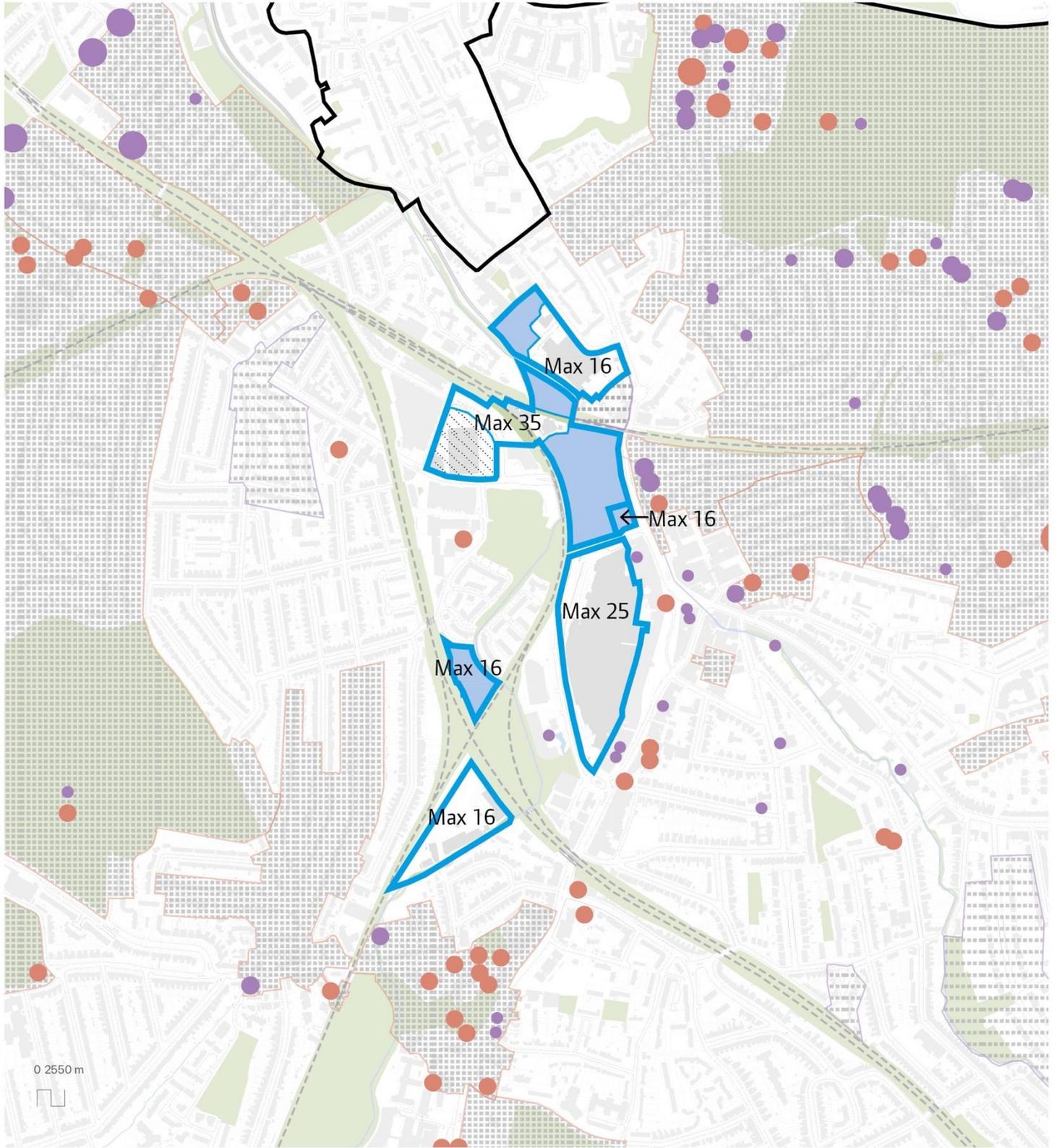
LEWISHAM TOWN CENTRE - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

LEWISHAM TOWN CENTRE - Emerging Character



KEY

-  Refined Tall Building Suitability Zone
-  Sites with permission for tall buildings
-  Sites under construction which include tall buildings

North Deptford and Deptford Creekside

4.35. Paragraph 15.3 of the emerging local plan describes the character of North Deptford as follows:

4.36. *“The North Area contains much of the Borough’s employment land stock which contributes to its distinctive industrial character. There are employment sites situated throughout, including the regionally important Strategic Industrial Location at Surrey Canal Road and clusters of Locally Significant Industrial Sites around Deptford Creekside. Several larger industrial sites have recently undergone a plan-led process of regeneration. Continued renewal of vacant and underused industrial sites will influence the area’s evolving character whilst providing for new homes, jobs and community facilities along with environmental improvements. For example, planning consent has been granted for major mixed-use developments at Convoys Wharf and Surrey Canal Triangle.”*

4.37. Many of the larger sites within the search areas identified in the Tall Building Addendum are undergoing regeneration. Lewisham are committed to supporting the renewal of Mixed-use Employment Locations (MELs) that deliver significant amounts of new housing, workspace, community facilities and public realm enhancements. However, Strategic Industrial Sites that play a pivotal role in providing employment and services for our communities will be protected.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
ND1	Surrey Canal Triangle Mixed-use Employment Location	N		Site allocation 9 (north area) Resolution to grant permission subject to the signing of the S106 and Stage 2 referral by the GLA. Permission granted for mixed use towers up to 45 storeys	Maximum height of 45 storeys as per resolution to approve granted in January 2022
ND2	Narrow open land along railway at junction of Surrey Canal Rd and Mercury Way leading to industrial sites comprised of single storey warehouse style units. Backs on to railway with 4 storey housing estate opposite	Y	designated - SIL		
ND3	Bermondsey Dive Under -Strategic Industrial Location and Locally Significant Industrial Site.	Y	designated - SIL	Site allocation 8 (north area) Unsuitable for residential use; however small scale commercial and industrial uses are possible.	
ND4	Gemini Estate - single storey warehouse style units. Backs on to railway arches and overlooked by power station	Y	designated - SIL		

ND5	South East London combined heat and power station site	Y	designated - SIL		
ND6	Waste management site bounded by Surrey Canal Rd, Landman Way and rail/railway arches	Y	designated - SIL		
ND7	Apollo Business Centre Locally Significant Industrial Site,	N		Site allocation 6 (north area) suitable for comprehensive employment-led redevelopment. Locally Significant Industrial Site.	Emerging context suggests tall development is acceptable as long as current employment uses are protected. Maximum heights of 25 storeys, on the three sites (ND7, ND8 and ND12) with access to Folkestone Gardens and Deptford Park.
ND8	Surrey Canal Road and Trundleys Road Locally Significant Industrial Site. Planning permission granted for mixed use development of 6-9 & 11-15 storeys	N		Site allocation 5 (north area) Planning application ref: DC/20/117966 under construction: max height 15 storeys	
ND9	railway substation	Y	designated - SIL		
ND10	Industrial warehouse site to the south of Surrey Canal Rd and to the east of Juno Way	Y	designated - SIL		
ND11	New Cross Gate over ground train depot	Y	designated - SIL		
ND12	Neptune Wharf Grinstead Road - mixed used development rising to 12 storeys	N		Site allocation 4 (north area) planning application ref: DC/10/075331 under construction-up to 12 storeys	Maximum heights of 25 storeys, on the three sites (ND7, ND8 and ND12) with access to Folkestone Gardens and Deptford Park.
ND13	Deptford Trading Estate	Y	designated - SIL		
ND14	Deptford Foundry, South London College and Olivet Deptford Baptist Church.	Y	Recently developed	Deptford Foundry up to 23 storeys (Cobalt Tower), prevailing heights 6-8 storeys	
ND15	Deptford Landings (previously known as Timberyards) Comprehensive redevelopment of brownfield site into mixed use development, submitted as a hybrid application in 2015, with subsequent reserved matters applications, as well as stand-alone application for corner of site at Scott House. Additional units are currently being considered for plots 1, 3 and 5.	N		Site allocation 2 (north area) under construction DC/15/092295 -Hybrid planning application, detailed planning permission for plot 1 (24 storeys); plot 2 (12 storeys) and plot 3 (11 storeys) DC/17/105015 – reserved matters	Maximum heights of 35 storeys may be acceptable, with regard given to emerging context, viewing corridors, shading and design code set out by Deptford Landings development

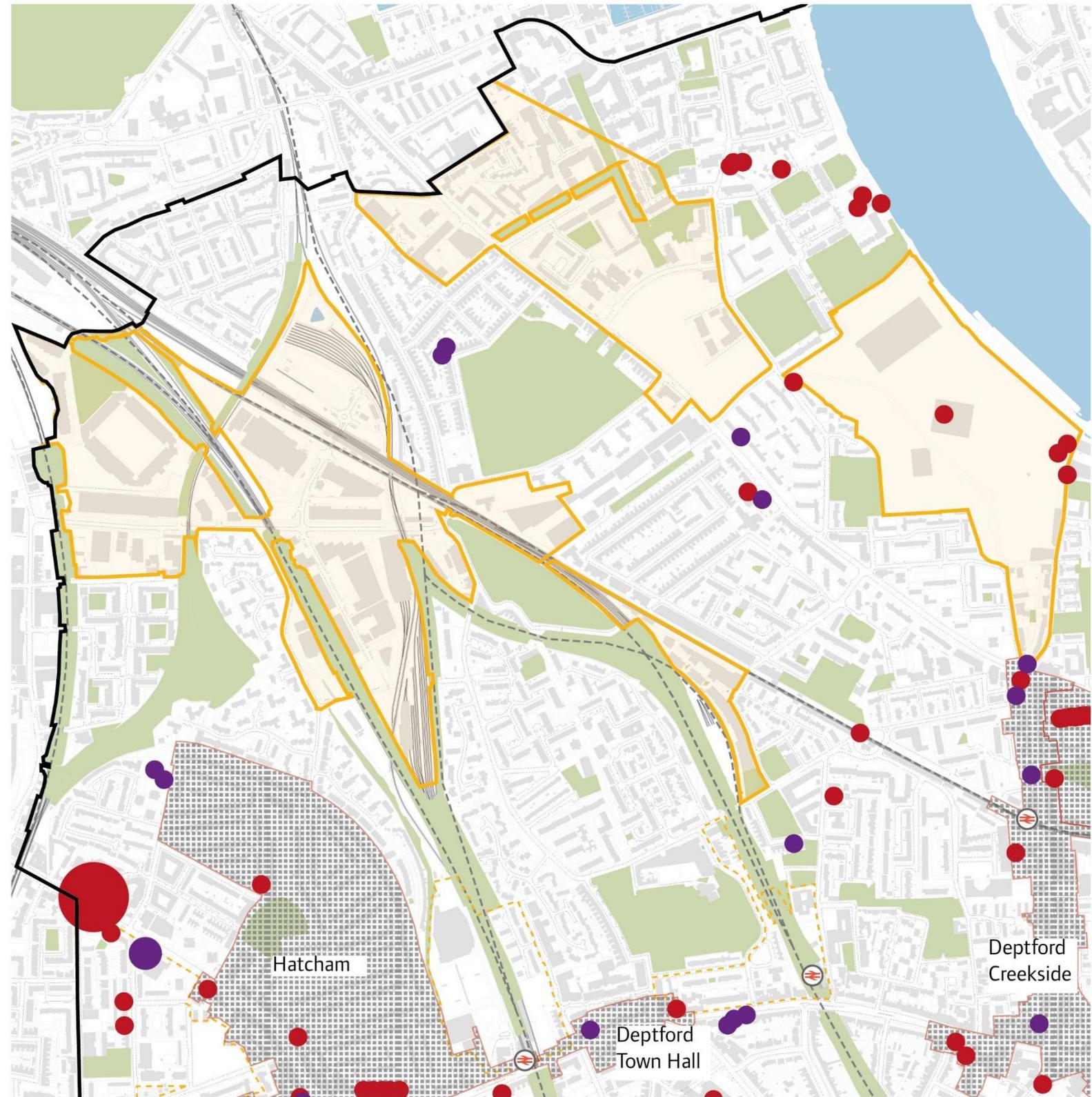
				application for plot 4 (8 storeys) DC/19/110414 - reserved matters application for plot 6 (8 storeys) DC/19/113332 – Redevelopment of Scott House Site (23-27 storeys)	
ND16	Evelyn Court at Surrey Canal Road Strategic Industrial Location	N		Site allocation 3 (north area)	
ND17	Deptford Park Primary school, high density (5 storey) post war housing, early 21st C small scale terraced housing and 3 storey flatted development onto Evelyn St opposite Victorian terraces	Y	essential community need – housing & school		
ND18	Pepy's Estate and adjacent post war low rise housing estate bordering Carteret Way	Y	essential community need – housing		
ND19	Recently redeveloped mixed use towers	Y	Recently developed		
ND20	Hazelwood House and adjacent late 20th/early 21st c housing development, plus corner school site	Y	Recently developed		
ND21	1-2 storey warehouse/industrial/retail sites including Lidl to north of site. McDonalds drive through and slither of housing estate (late 20th/early 21st c)	Y	sensitive/ transition site – low rise housing adjacent		
ND22	Convoy's Warf	N		Site allocation 2 (north area) under construction Planning permission ref: DC/13/083358	Maximum building heights of 48 storeys as per planning permission. However, buildings of this height are to be treated as marker building, strategically placed within the development.

Deptford Creekside

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
DC1	Land overlooking Deptford Creek adjacent Laban Theatre and new development of Union Warf (up to 23 storeys)	N		Site allocation 19 (north area) Planning permission ref: DC/18/108548 - 26/30 storey blocks with 5 storey block adjacent. Resolution to grant permission subject to the signing of the S106 and Stage 2 referral by the GLA.	Max. 30 storeys as shown to be acceptable in recently submitted design documentation

DC2	Laban Theatre and Trinity Laban Dance Faculty – iconic three storey development overlooking Deptford Creekside	Y	Recently developed		
DC3	Green open space adjacent Laban	Y	Designated - open space and adjacent green		
DC4	Bowspirit Apartments – recently developed up to 16 storey mixed use blocks	Y	Recently developed		
DC5	Sun Wharf Mixed-Use Employment Location (including Network Rail)	N		Site allocation 18 (north Area) DC/20/118229 – Resolution to grant permission subject to the signing of the S106 and Stage 2 referral by the GLA.	Max 20 storeys in respect of prevailing urban grain and character
DC6	Cockpit Arts Centre	Y	Under construction – proceeding without tall buildings	DC/22/125674	Development proceeding without tall buildings

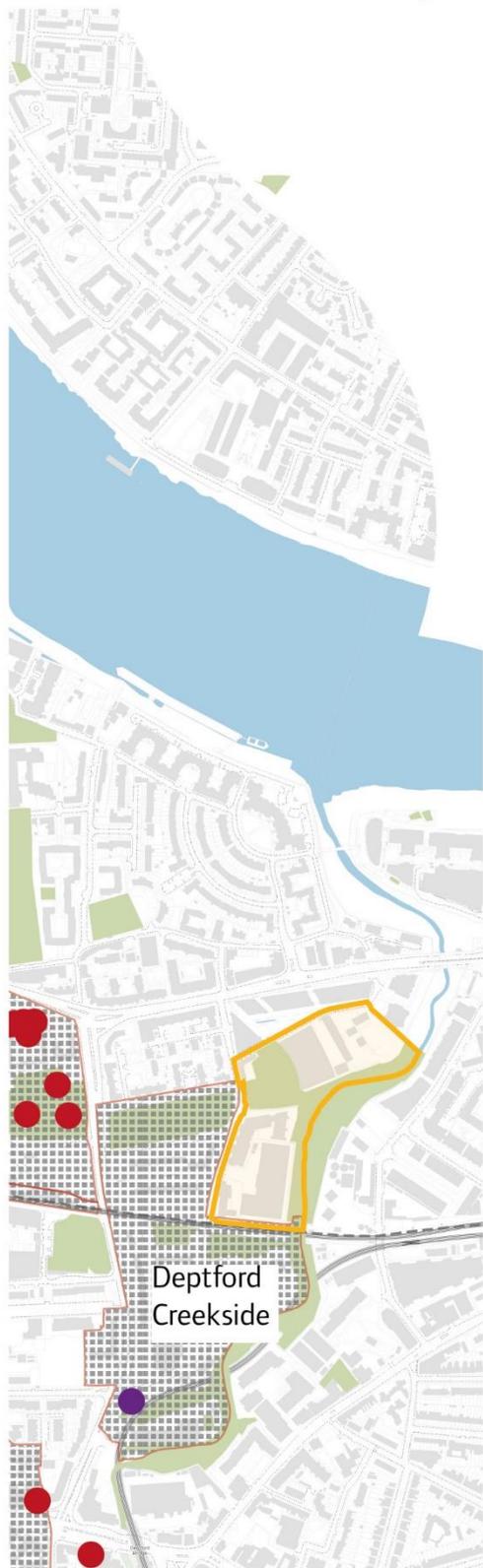
NORTH DEPTFORD - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset
-  Lewisham Borough Boundary

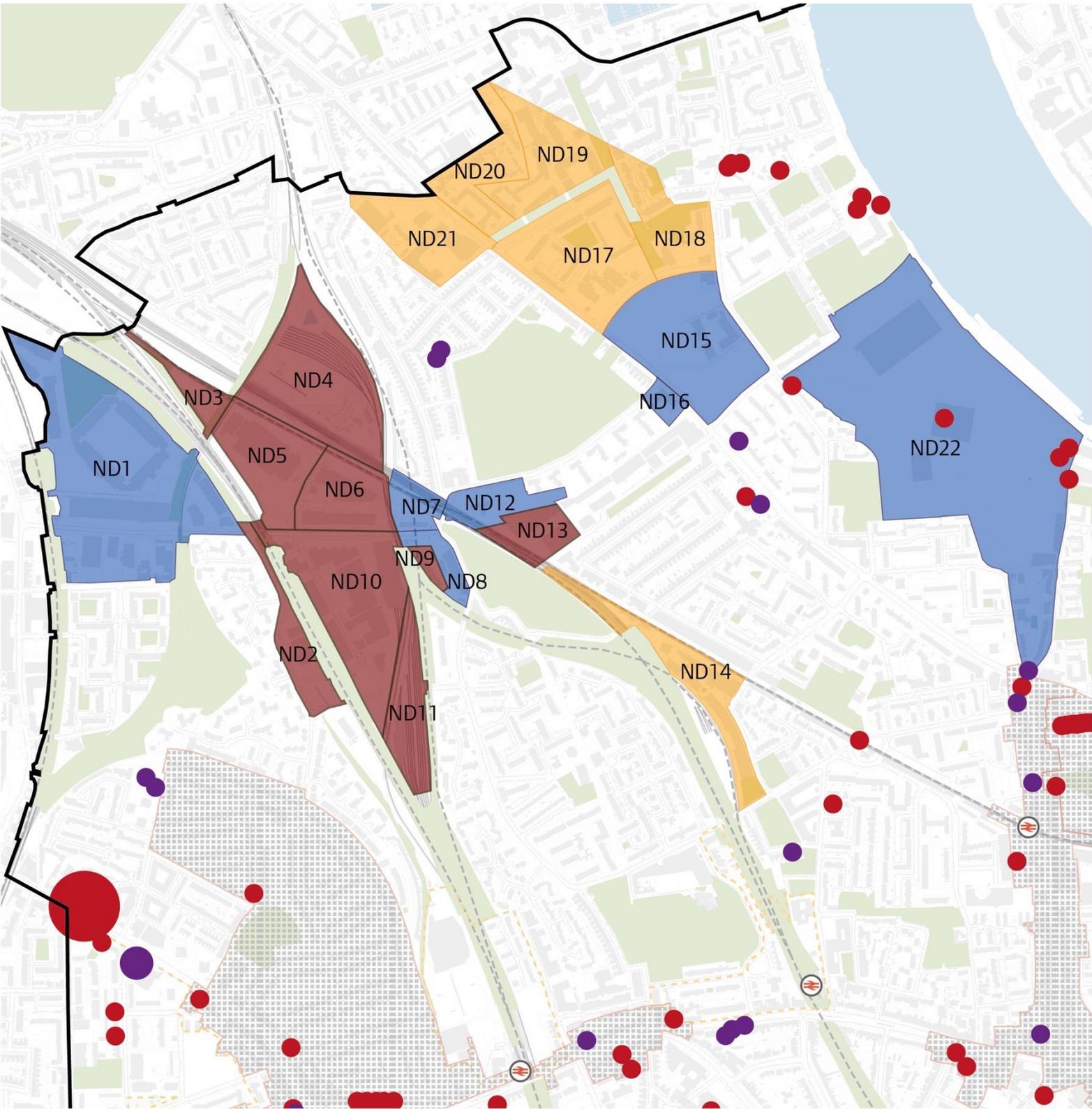
DEPTFORD CREEKSIDE - Existing Context



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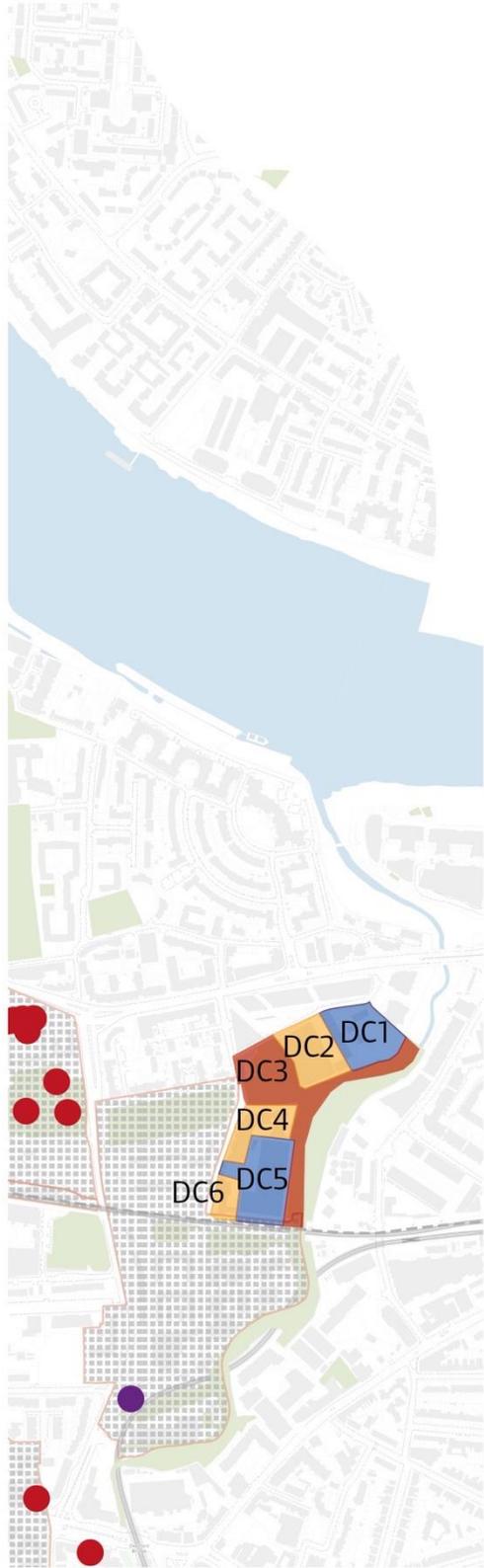
NORTH DEPTFORD - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

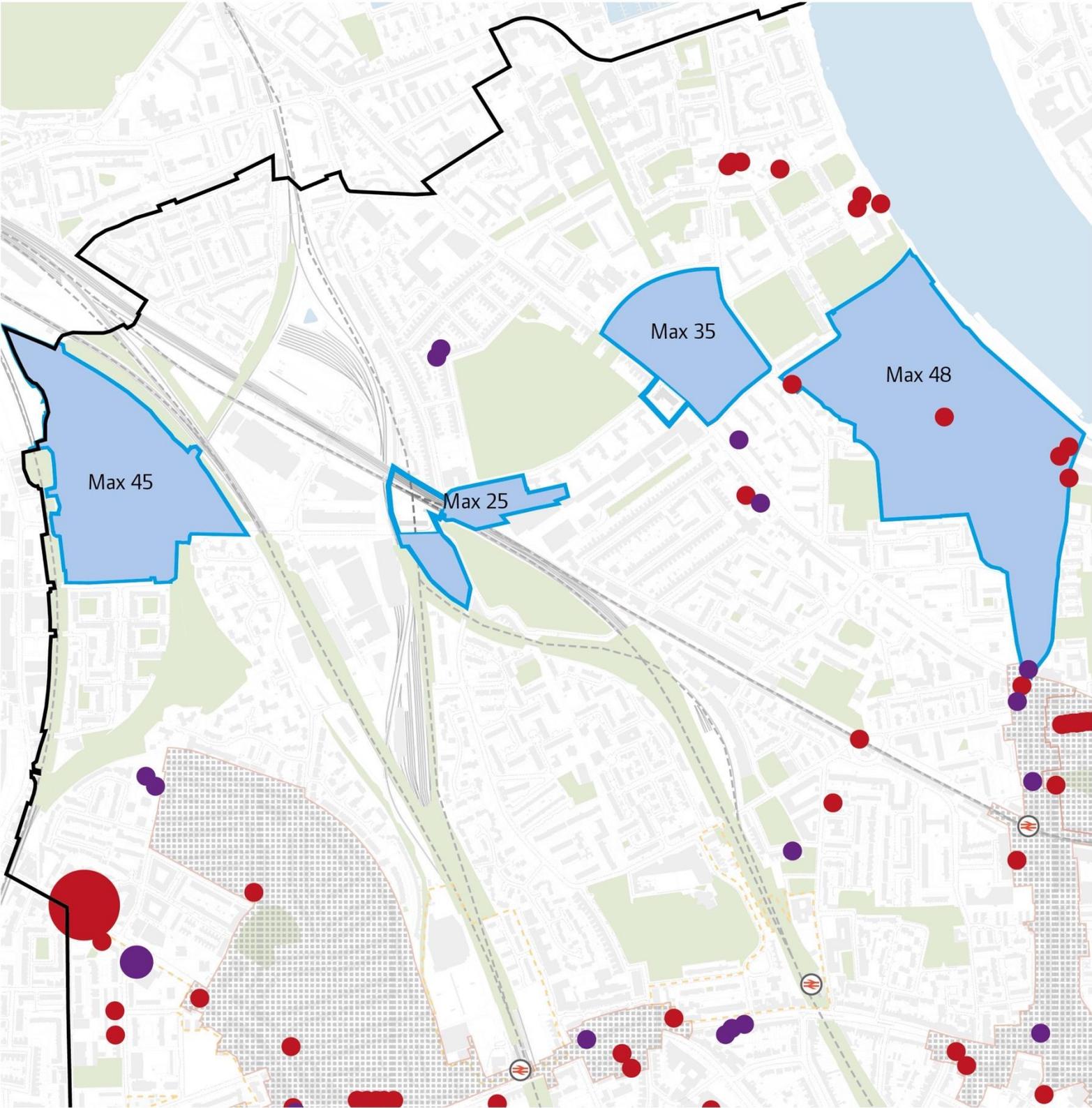
DEPTFORD CREEKSIDE - Character Study



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-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

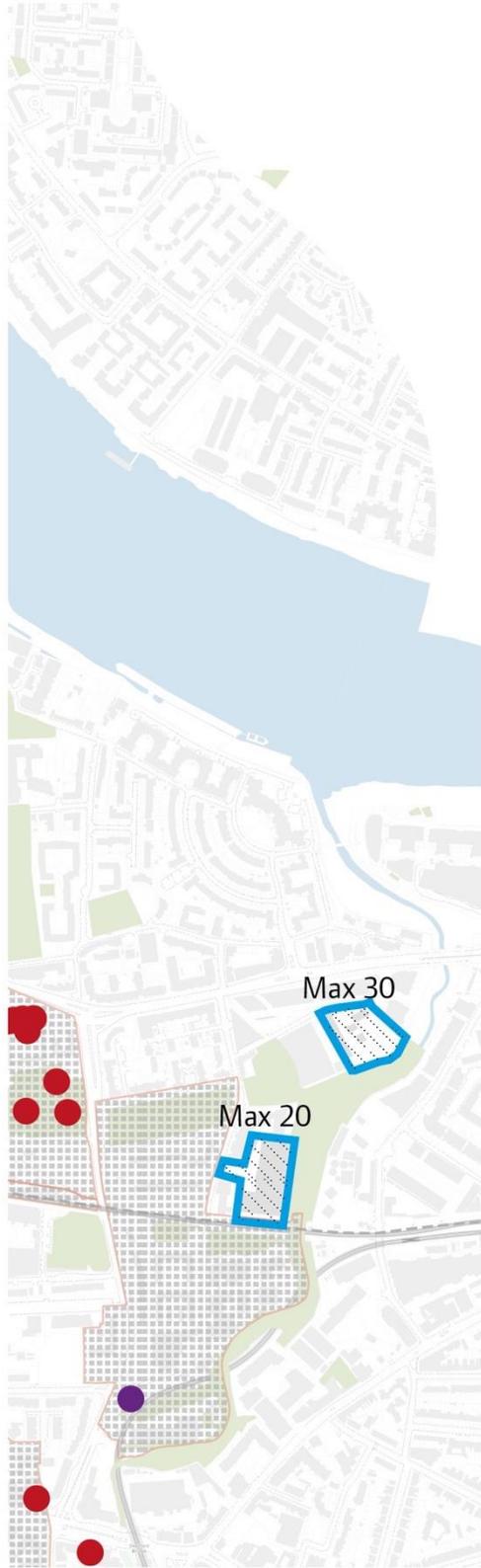
NORTH DEPTFORD - Emerging Character



KEY

-  Refined Tall Building Suitability Zone
-  Sites with permission for tall buildings
-  Sites under construction which include tall buildings

DEPTFORD CREEKSIDE - Emerging Character



KEY

-  Refined Tall Building Suitability Zone
-  Sites with permission for tall buildings
-  Sites under construction which include tall buildings

New Cross

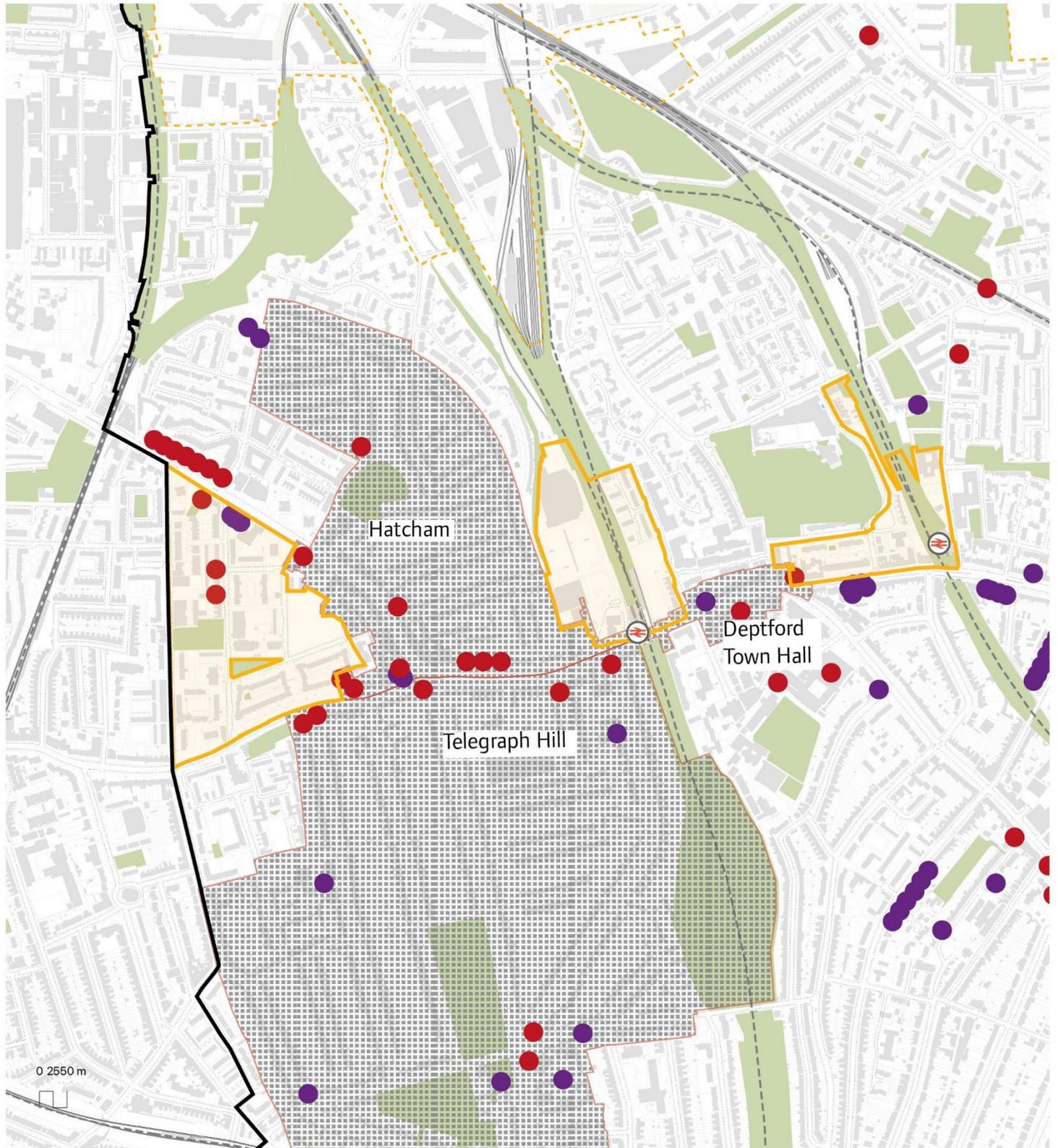
- 4.38. Paragraph 15.5 of the emerging local plan describes the character of New Cross' historic high street as playing *“a key role in shaping and reinforcing local character and identity. They offer provision of a rich and vibrant mix of shops, services and independent traders... New Cross District Centre is a vibrant town centre and thriving evening and night-time economy hub that serves its local catchment, including a large student population.”*
- 4.39. Development along the A21 corridor at New Cross should be in line with the Catford Area Framework, respecting the historical urban grain of the high street. Tall Development along this route will not be acceptable. Tall buildings should be stepped back from the main road, respecting adjacent heritage assets, including Conservation Areas.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
NC1	C20 council estates and terraced estate housing, including Hutchinson House, Hammersley House and Romney Close	Y	essential community need – housing		
NC2	Existing domestic scale buildings GrII buildings: 32-34 New Cross Road, 58-66 Kender Street, 56 Kender Street, and C19 terraces adjacent at 24-54 Kender Street	Y	designated – Gr II listed Assets		
NC3	Recently developed residential buildings up to 8 stories, Sunbelt toolhire site	Y	Recently developed	Up to 8 storeys	
NC4	Hatcham Gardens, Besson Street Community Gardens and Kender Primary School	Y	designated – open space; essential community need - school		
NC5	C20 council estates and terraced estate housing, including one site recently developed site. On the corner of Queen's Road and Kender Street is the Montague Arms Pub	Y	designated - SIL		
NC6	Sites along New Cross Road including locally listed No.44-50 next to vacant lot at 52. 13 storey residential tower and c20 estate housing along lubbock Street behind	Y	designated - SIL		
NC7	Besson Street / Kender Triangle brownsite	N		Site allocation 6 (north area) DC/19/114805 – comprehensive	Maximum 12 storeys in line with approved consent

				redevelopment heights up to 12 storeys Resolution to grant permission subject to the signing of the S106 and Stage 2 referral by the GLA.	
NC8	C21 development consisting of two perimeter blocks bounded by Lanchester Way and Besson Street	Y	Recently developed		
NC9	Former Hatcham Works, New Cross; formed of single storey large retail stores (primary anchor- Sainsbury's) and car parking. Bounded by Conservation Area on western side	N		Site allocation 11 (north area)	Heritage impact assessment states tall buildings to be set back from New Cross Road and centrally located to minimise impact. No tall buildings to be visible over the roofscape of New Cross Road as viewed from the junction with Lewisham Way. Means of mitigating or minimising the impact of tall buildings on the setting of Hatcham and Telegraph Hill Conservation Area and on views from within them should include consideration of silhouette, location and footprint, materiality and elevational design. Maximum heights 15
NC10	12 Goodwood Road and New Cross Road	N		Site allocation 12i; (north area)	
NC11	New Cross Road, existing high street buildings making a positive contribution to urban realm	Y	Sensitive/ transition site – existing urban character would not support tall buildings		
NC12	Estate to the rear of brownfield site bordering Goodwood Street and including Auburn Close	Y	Essential community need – housing		
NC13	New Cross High Street, including new development of 4 storeys to NXR,	Y	Sensitive/ transition site		

	raising to 6 storeys behind at 333-337. Lower density buildings meeting Pagnel St set back from NXR. Gr II listed No 329-331 New Cross Rd; The Venue - NB local building. Some new development (Walpole + adj) peppered between 3 storey Georgian/early Vic high street buildings with active ground floors		- existing urban character would not support tall buildings		
NC14	2 storey buildings on Clifton Rise and rear yards to Achilles Street, forming gateway to Fordham Park	N			Maximum 12-15 storeys, sited to respect adjacent heritage assets
NC15	Achilles Street Estate - set aside by LB Lewisham for estate regeneration	N		Site allocation 14 (north area)	
NC16	Existing residential Estate with infill contemporary development of up to 3 storeys	Y	Constrained site		
NC17	strategic open space and existing 2 storey terraced housing adjacent school	Y	essential community need - housing, school		
NC18	Amersham Vale parking lot and 'Metro new cross' currently used as a volunteer Lewisham base + Mulberry Education Centre - 2 stories adjacent Allotments to South	N		Identified as opportunity area in NX Area framework	Maximum 10-12 storeys

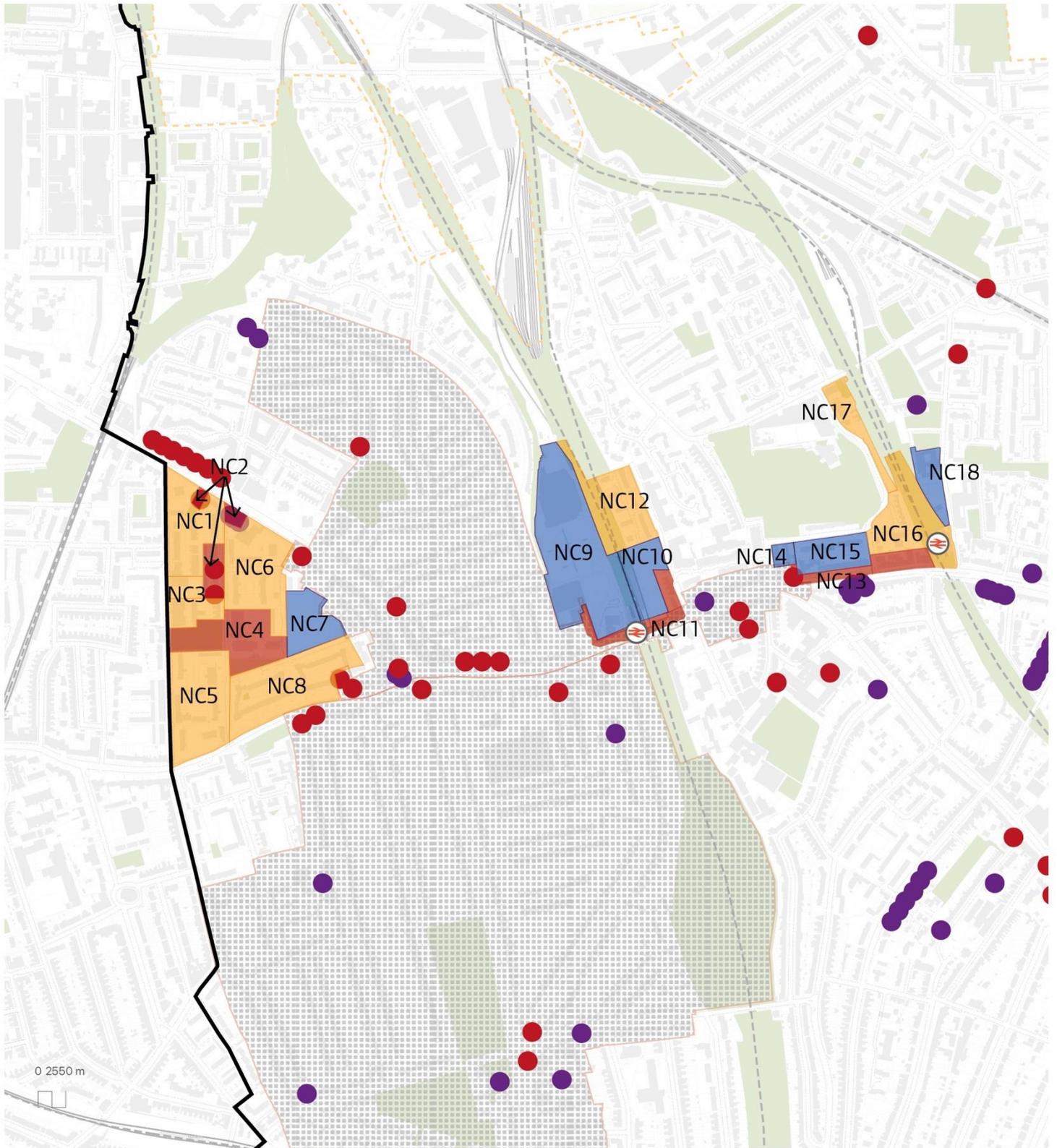
NEW CROSS - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset
-  Lewisham Borough Boundary

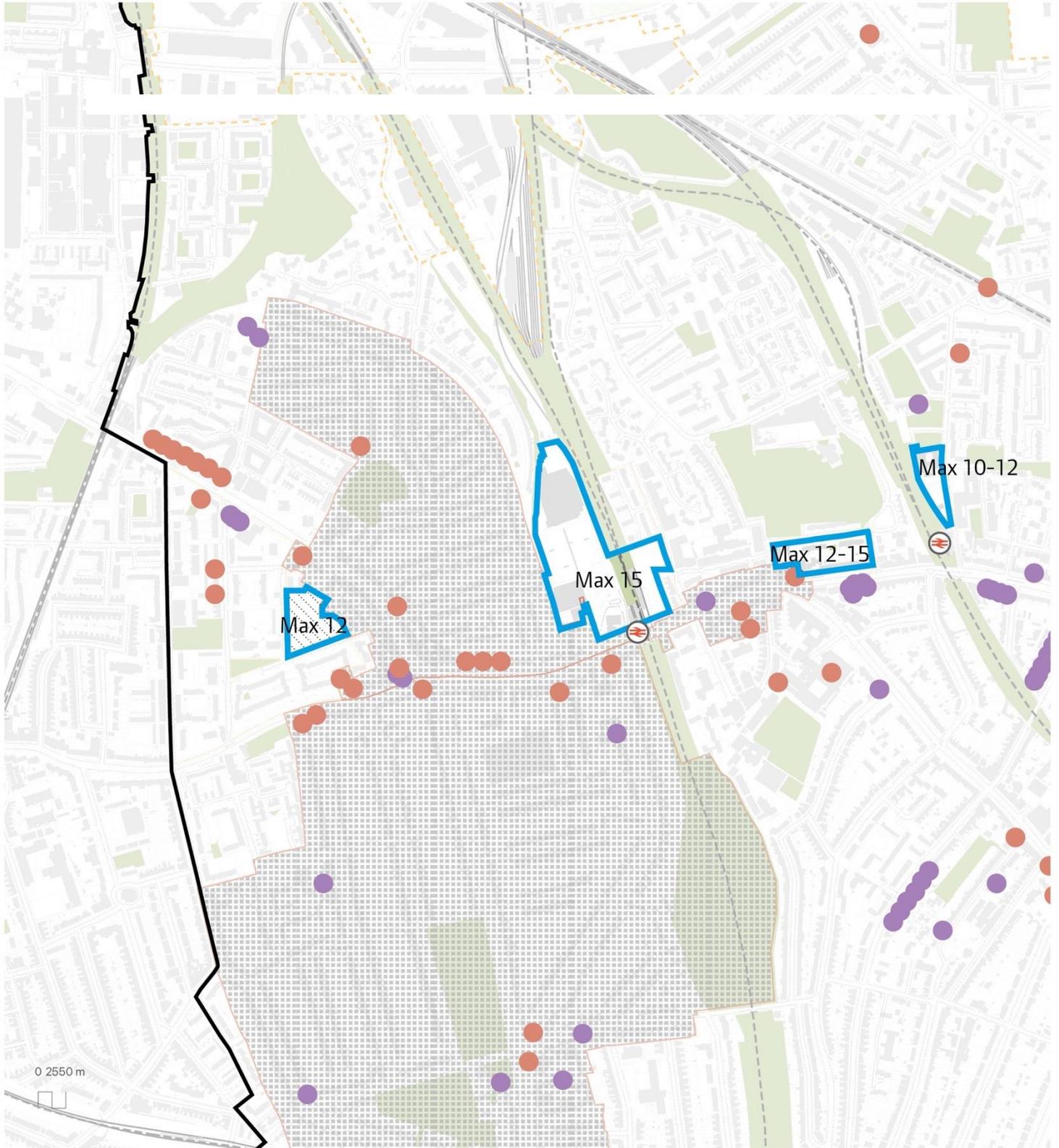
NEW CROSS - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

NEW CROSS - Emerging Character



KEY

-  Refined Tall Building Suitability Zone
-  Sites with permission for tall buildings

Catford

4.40. From Lewisham’s Emerging Local Plan paragraph 14.3 Catford Major Centre’s character is described as follows:

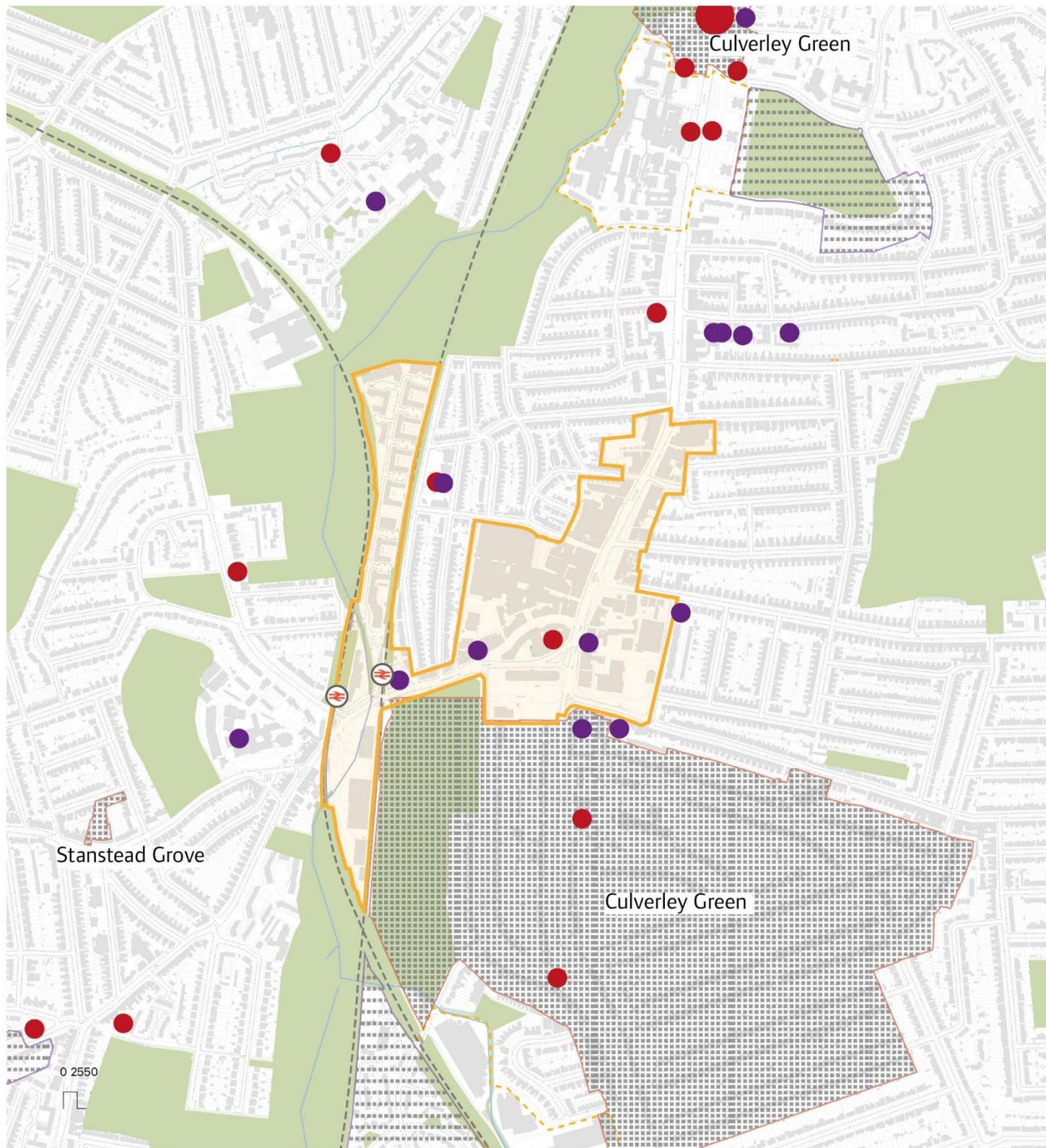
4.41. *‘Catford Major Centre comprises the civic hub of the Borough with a key focal point at the historic Broadway Theatre. The town centre has a distinctive urban character with office and commercial buildings which are surrounded by smaller scale, established residential areas and high quality open spaces. Some sites have recently been redeveloped to a high quality design standard, such as the Catford Stadium, which has enabled river restoration works. However the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, creates issues of severance and poor permeability with the town centre and its surrounds. The quality of the public realm is generally poor throughout the centre, particularly along the South Circular and at its junction with Rushey Green (A21). There are significant site redevelopment opportunities, which alongside planned transport improvements, will allow the character of Catford to be ‘reimagined’.’*

4.42. The Catford Town Centre Framework (CTCF) is an endorsed strategy that provides guidance on the suitability of different building heights and intensities of development within the area. Maximum building heights are established and shown on pages 54-57. These were of material consideration when proposing maximum heights as laid out below and in the maps which follow.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
C1	Contemporary residential development running between railway lines and overlooking River Ravensbourne/ Ladywell Fields to the west and north. Mixed use tower adjacent Catford Station with ground floor town centre use	Y	Recently developed	Completed scheme scale: up to 8 storeys Along river	
C2	Wickes and Halfords big box retail site Low intensity non-residential use that could support mixed use in the future	N		Site Allocation 21 (central area) Key regeneration site in CTCF	Varied heights, reducing in scale towards the perimeter of the site. Max 20 at centre, 12 at periphery
C3	Catford Station, Catford Bridge Station and Catford Bridge Tavern, a locally listed landmark building, all contribute positively to the character and first impression of Catford on arrival from the train	Y	Asset – locally listed; essential community need - infrastructure	CTFC reimagines the rerouting of the South Circular for better pedestrian access and public realm	
C4	Laurence House and Civic Centre with Rushey Green telephone exchange building behind. Mid-late 20 th century civic buildings in the heart of Catford town centre, adjacent to the Grade II Listed Broadway Theatre.	N		Site allocation 19 (central area) Key regeneration site in CTCF alongside rerouting of south circular to form a ‘civic campus’	Height variation with ‘marker’ buildings of max 12 storeys to respond to Grill

					listed Catford Broadway
C5	Broadway Theatre; Catford Broadway shopping parade and Rushey Green High Street buildings to the west of Catford Island Retail Park. All 19th/early 20th C buildings + some post war infill buildings with active ground floor shop fronts. Important positive contributors to the character of Catford town centre	Y	Designated – Gr II listed; asset – locally listed	CTFC reimagines a Green town centre with improved public realm and town centre uses	
C6	Catford Shopping Centre and Milford Towers.	N		Site Allocation 17 (central area) Key regeneration site in CTCF	Max 20 storeys at centre, with scale providing an appropriate transition to surrounding lower rise development. May be opportunity for taller elements of max 12 storeys in discreet locations subject to detailed testing.
C7	Catford Island Retail Park formed of big box retail and industrial yards, including Eros House but excluding finer grain buildings forming the principal elevation to Rushey Green	N		Site Allocation 18 (central area) Key regeneration site in CTCF Extant permission for 9 storey development on part of the site. Ref: DC/17/103748	Max 20 at centre, with scale providing an appropriate transition to surrounding lower rise development. May be opportunity for taller elements of max 16 storeys in discreet locations subject to detailed testing.
C8	Rushey Green High Street buildings of varied age, quality and states of repair.	Y	Endorsed framework precludes tall development (CTCF)	CTCF reimagines some incremental intensification but unlikely to support buildings taller than 10 storeys.	Recent development to rear of Rushey Green shopfronts typically up to 4 storeys only
C9	Aldi site on Rushey Green	Y	Endorsed framework precludes tall development (A21)		Not suitable for additional tall development due to distance from town centre.

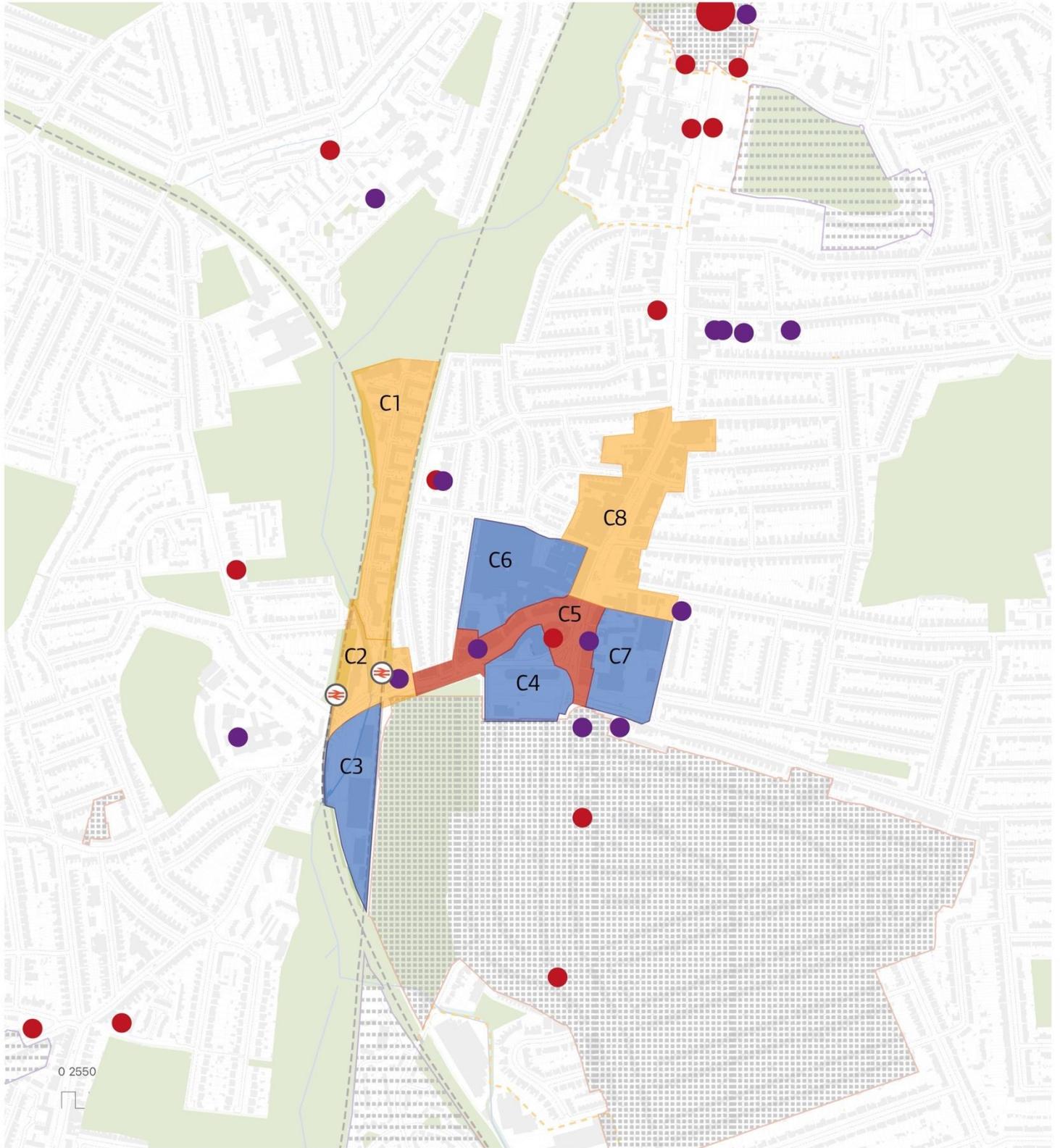
CATFORD - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset

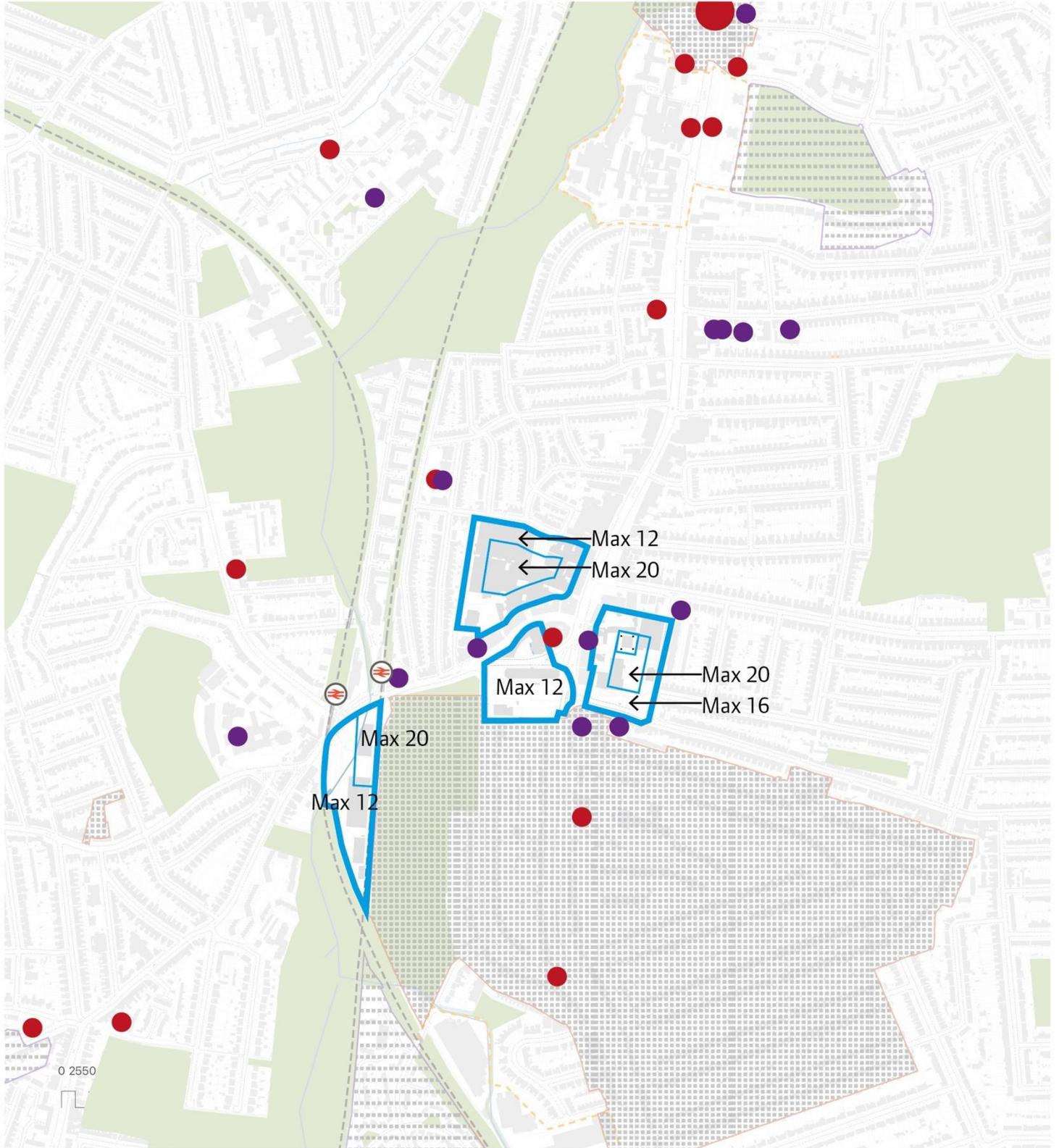
CATFORD - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

CATFORD - Emerging Character



KEY

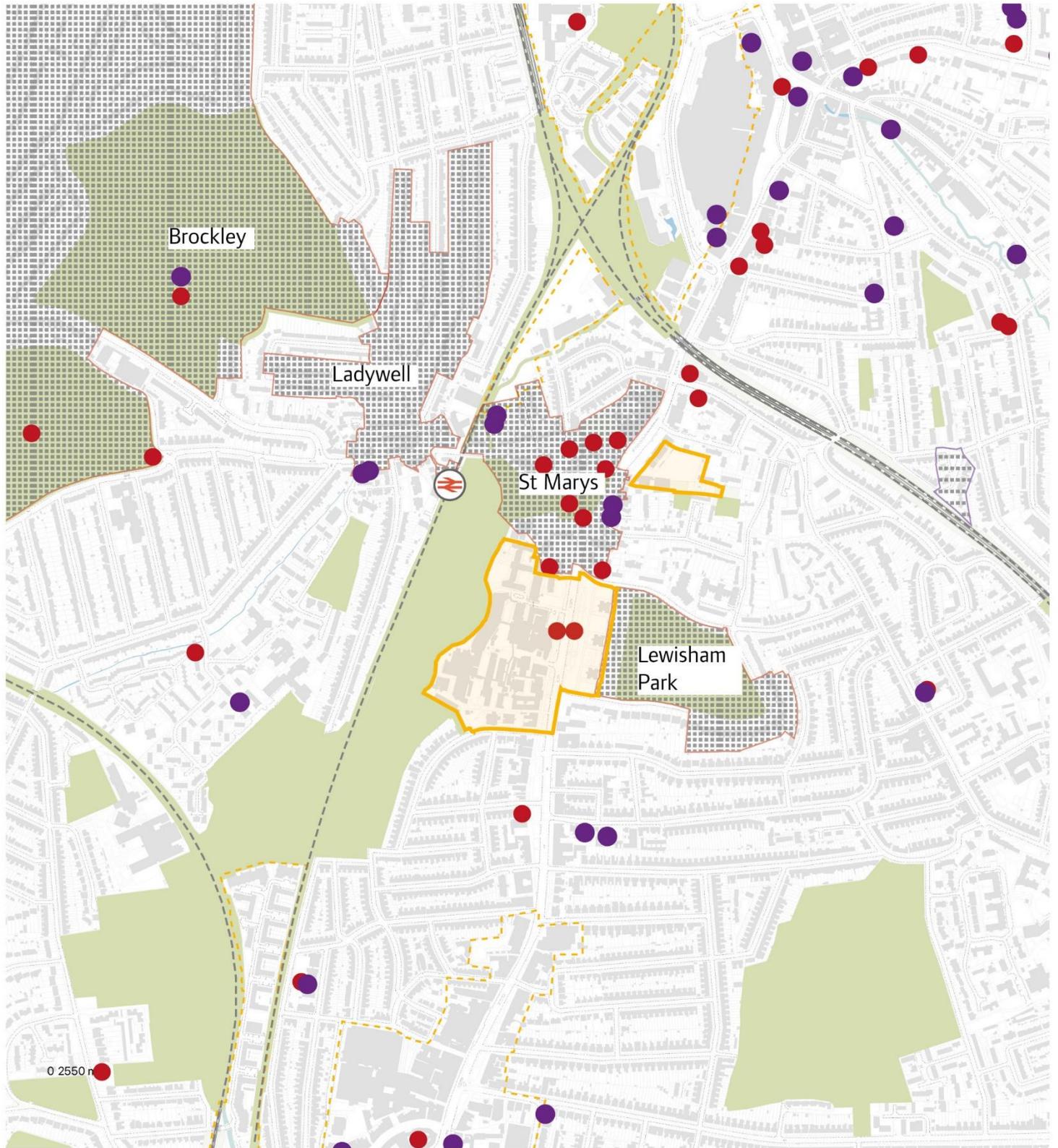
-  Refined Tall Building Suitability Zone
-  Sites with permission for tall buildings

Ladywell

- 4.43. From Lewisham's Local Plan, paragraph 14.4 describes the character around the A21 at Ladywell as *'well established around Lewisham Hospital (with opportunities to 'reinforce' the existing character).'*' This is further supported by the A21 Framework which describes the Ladywell tall building suitability zone as a *'healthcare and green quarter with London Squares (linear pocket-parks) character'* with development opportunities limited to *'infill developments in respect of prevailing building heights along the promenade'* (page 42)
- 4.44. Along with the granular site analysis shown below, the above character appraisals indicate that new tall development is not suited to the Ladywell search area. Ladywell has therefore been removed from the tall building suitability zone.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
LW1	University Hospital Lewisham site with Gr II listed telephone kiosk to High Street	Y	Essential community need - hospital		
LW2	Grade II Listed Lewisham War Memorial and associated gardens, adjacent to the 3x 18 story Lewisham Park point blocks	Y	Designated – MOL and Gr II listed; essential community need housing		
LW3	PLACE/Ladywell (former Ladywell Leisure Centre), a meanwhile use space with permission to continue to occupy the site until comprehensive development takes place	Y	Sensitive or transitional land	Site allocation 13 (central area) The site is due to undergo comprehensive redevelopment. Increased height has been tested on the site by the design team and at LDRP and it has been concluded to be an inappropriate response to the context	Site development going forward with mid-rise housing.

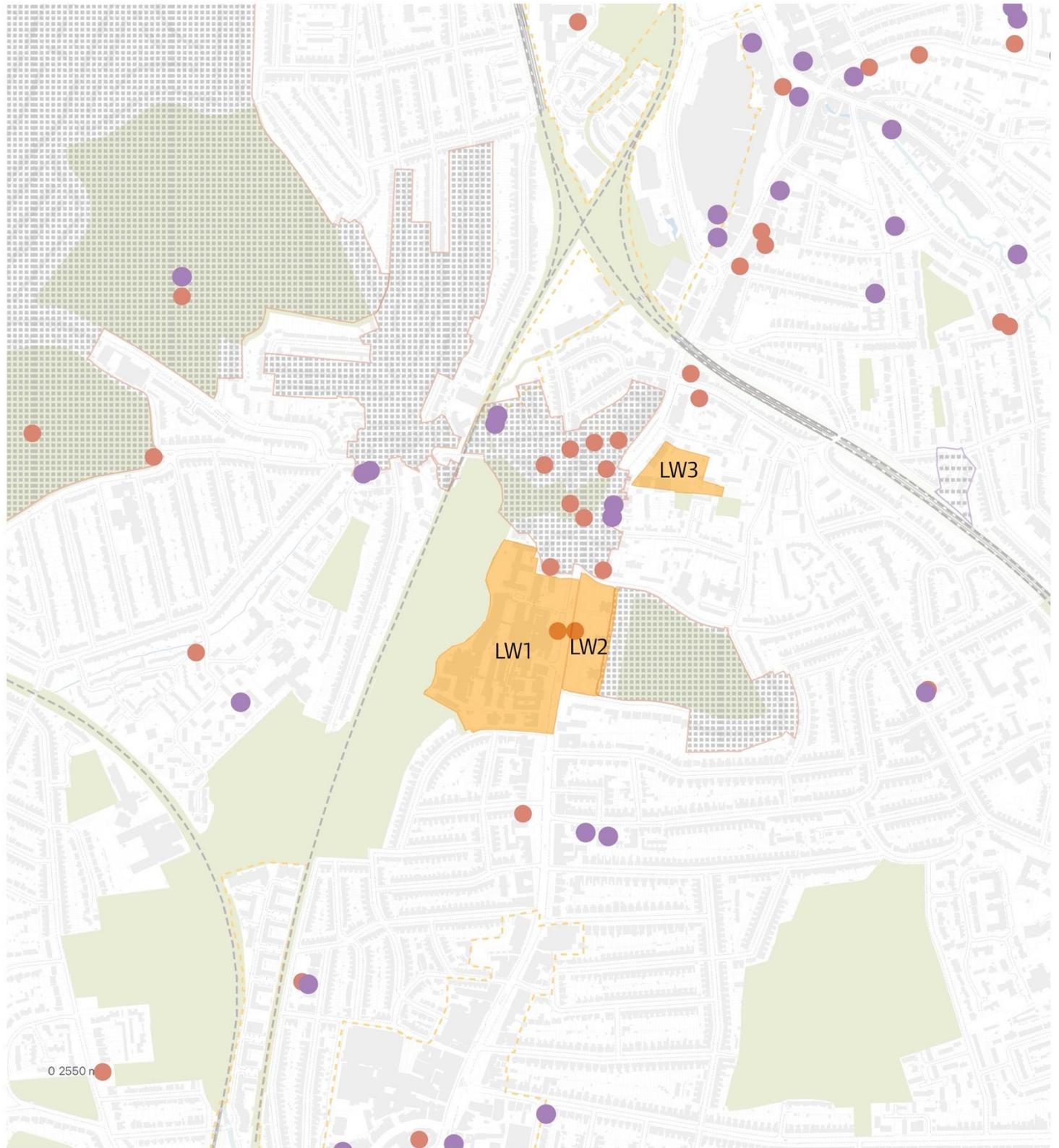
LADYWELL - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset

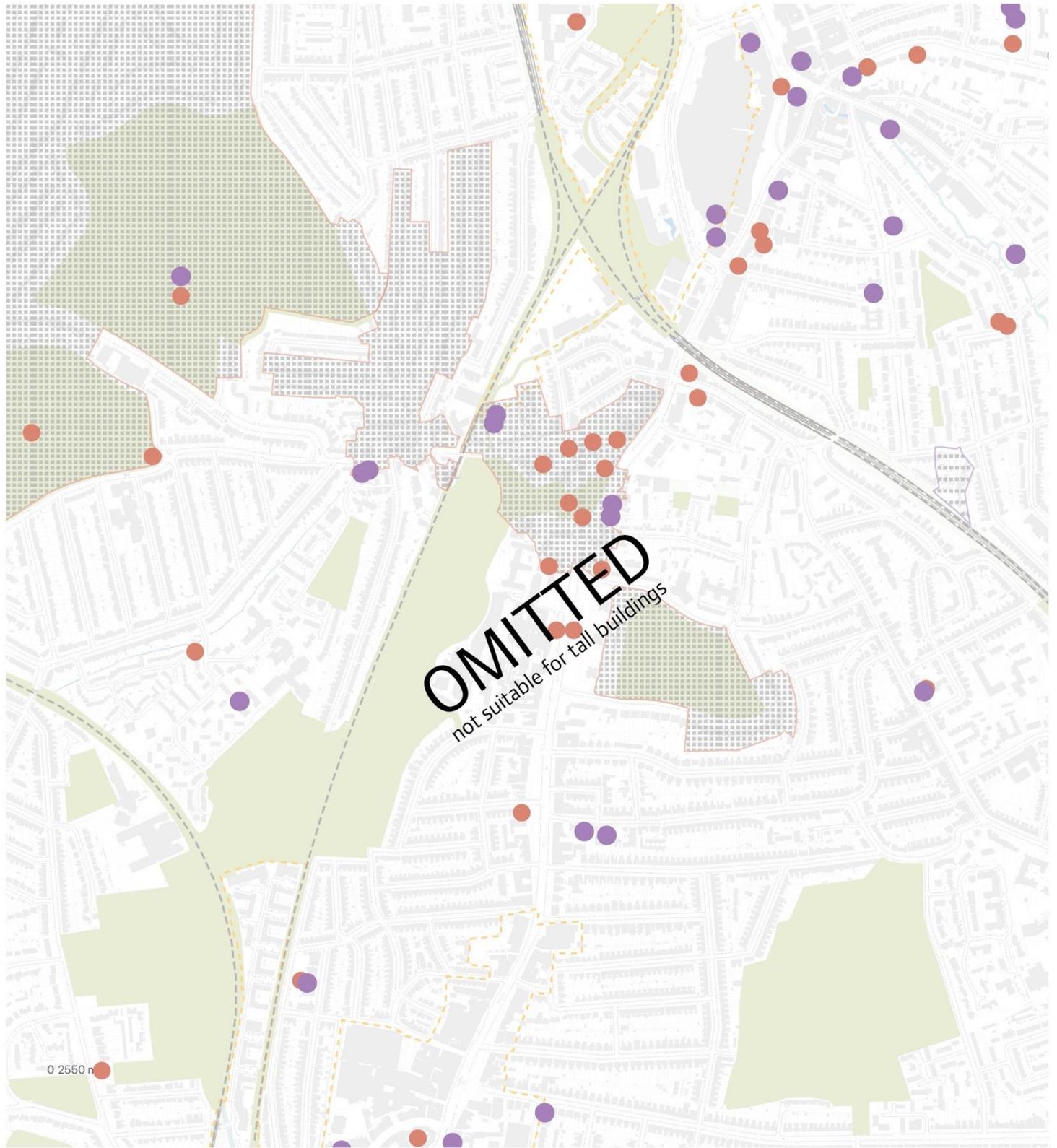
LADYWELL - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

LADYWELL - Emerging Character



KEY

 Refined Tall Building Suitability Zone

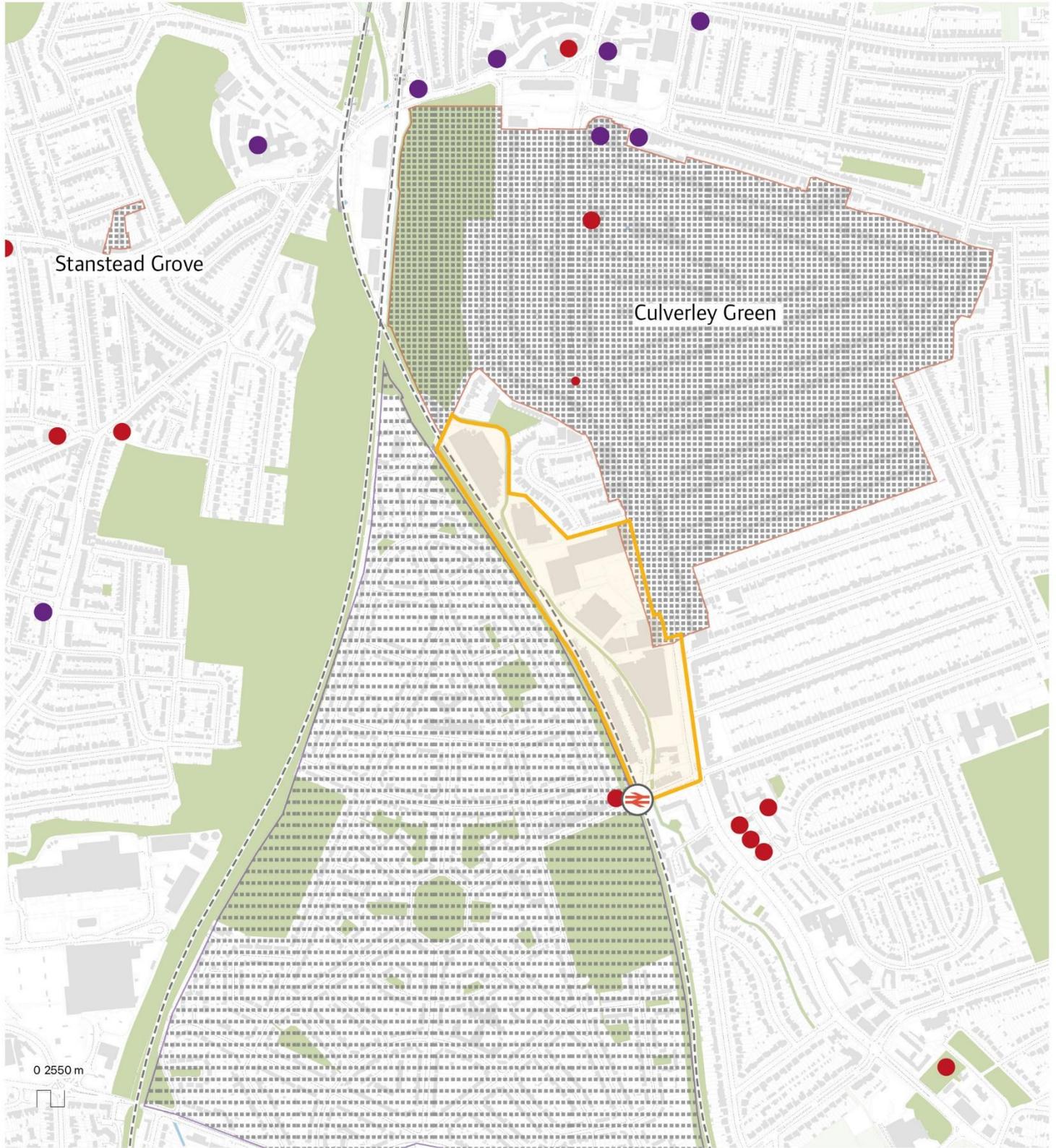
Bellingham

- 4.45. From the A21 Framework describes the character of Bellingham as a “*juxtaposition between the late Victorian/Edwardian villas and suburb character on the east side and the big box retail, flats and Royal Mail depot on the west.*” The sites identified as suitable for tall building in the Addendum are predominantly industrial, flanked by the Ravensbourne River and low-density residential areas. The A21 Framework notes the prevailing building heights of approximately 2-4 storeys; and therefore, recommends that future building heights remain relatively low at 3-6 storeys, and 10 storeys on the Ravensbourne Retail Park Site due to its large size.
- 4.46. A key spatial objective set out in Lewisham’s central area is to “*protect and enable the renewal of industrial land and Bromley Road.*” (page 445, draft regulation 19 local plan). The sites identified for possible tall development in Bellingham which are designated as Strategic Industrial Land (SIL) have therefore been removed from the refined tall building suitability zone. This is to protect the employment opportunities and key services that these sites provide.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
B1	Dhamecha cash and carry site, former telecom depot. Redeveloped in 2011 to be single storey warehouse style retail store	Y	designated - SIL		
B2	Catford Police Base - 3-4 storey modernist brick building with single access point off Aitken Road. Site overlooks the rear of small scale Victorian terraces on Barmeston Road	Y	designated - SIL		
B3	Ravensbourne Retail Park - 2 storey out-of-centre retail park with large car parking lot.	N		Site allocation 22 describes an opportunity for intensification with mixed use development	A21 Framework suggest 10 storeys is appropriate given the size of the site. If pushed away from sensitive edges, max 12 storeys may be acceptable
B4	Land adjacent Ravensbourne retail park currently occupied by self-storage unit and warehouse style retail use.	Y	designated - SIL	A21 development framework earmarks the site for future large park enhancing connection to Ravensbourne River	
B5	bus depot with high quality existing brick buildings	Y	designated - SIL		
B6	Site adjacent to Bellingham train station with single storey terraced High Street buildings on Randlesdown Road	Y	designated - SIL		

B7	Industrial estate along Franthorne Road to east of Ravensbourne River	Y	designated - SIL		
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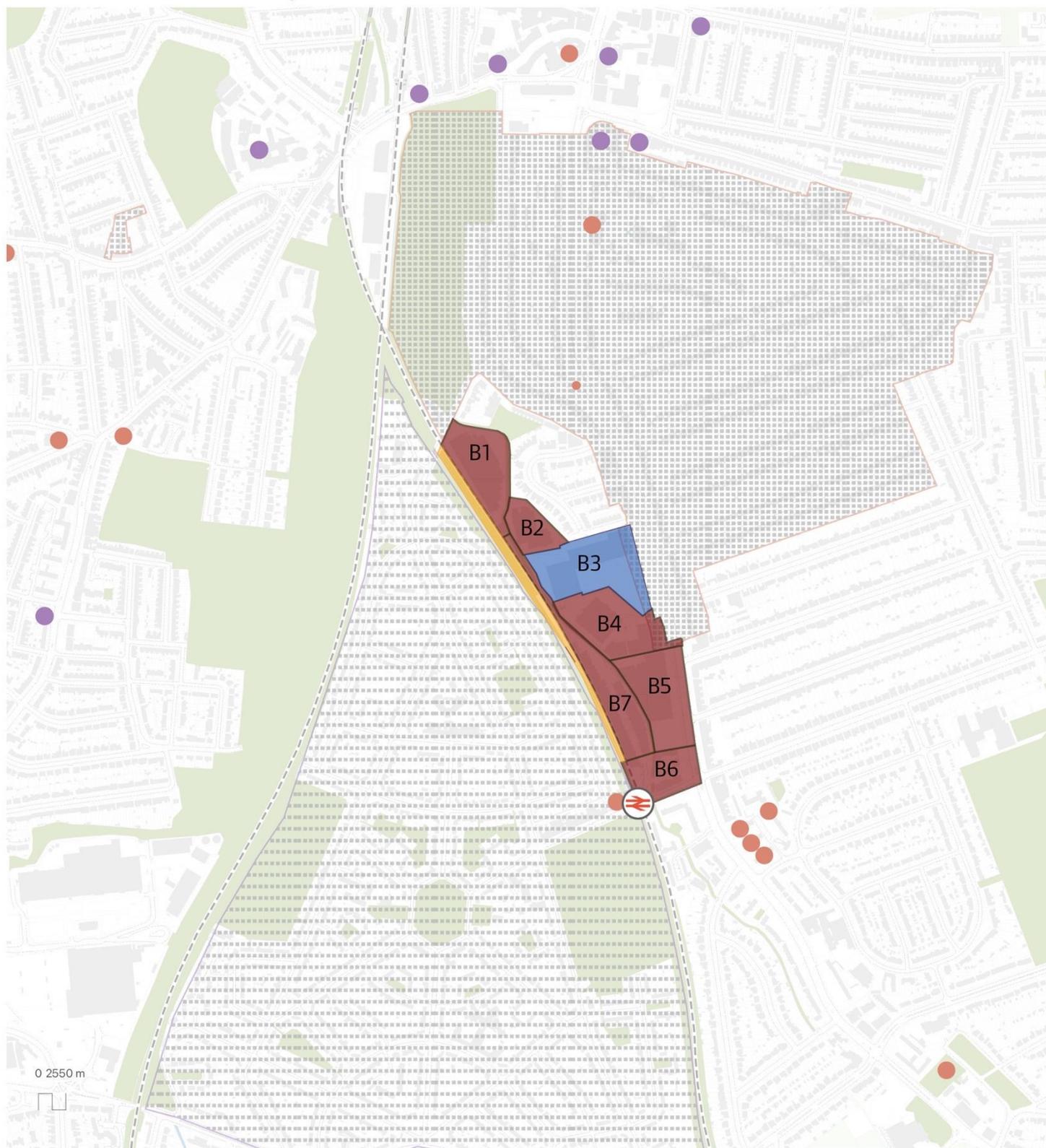
BELLINGHAM - Existing Context



KEY

-  Tall Building Suitability Zone identified in Tall Building Addendum (2022)
-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
-  Locally Listed Asset

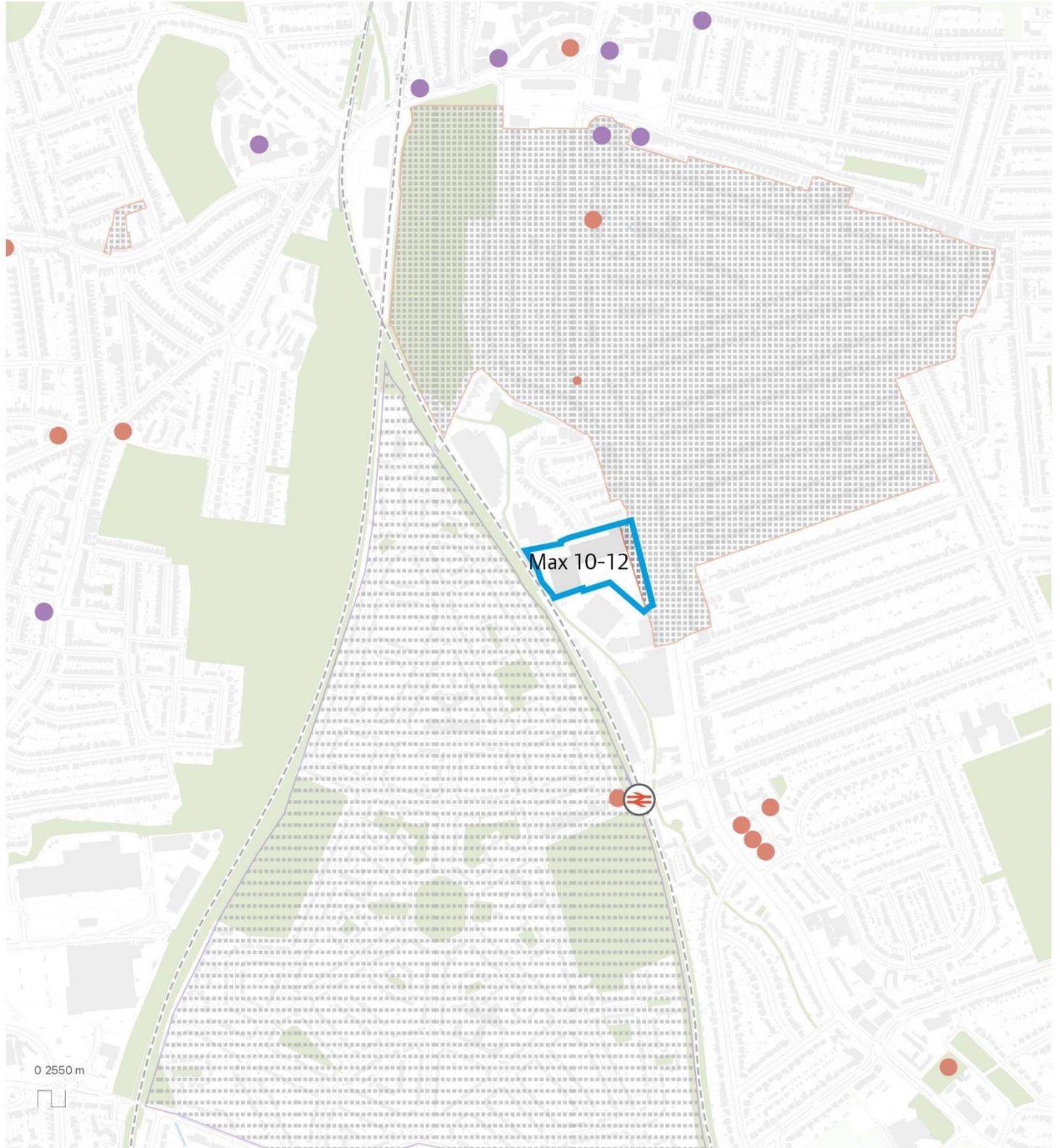
BELLINGHAM - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

BELLINGHAM - Emerging Character



KEY

 Refined Tall Building Suitability Zone

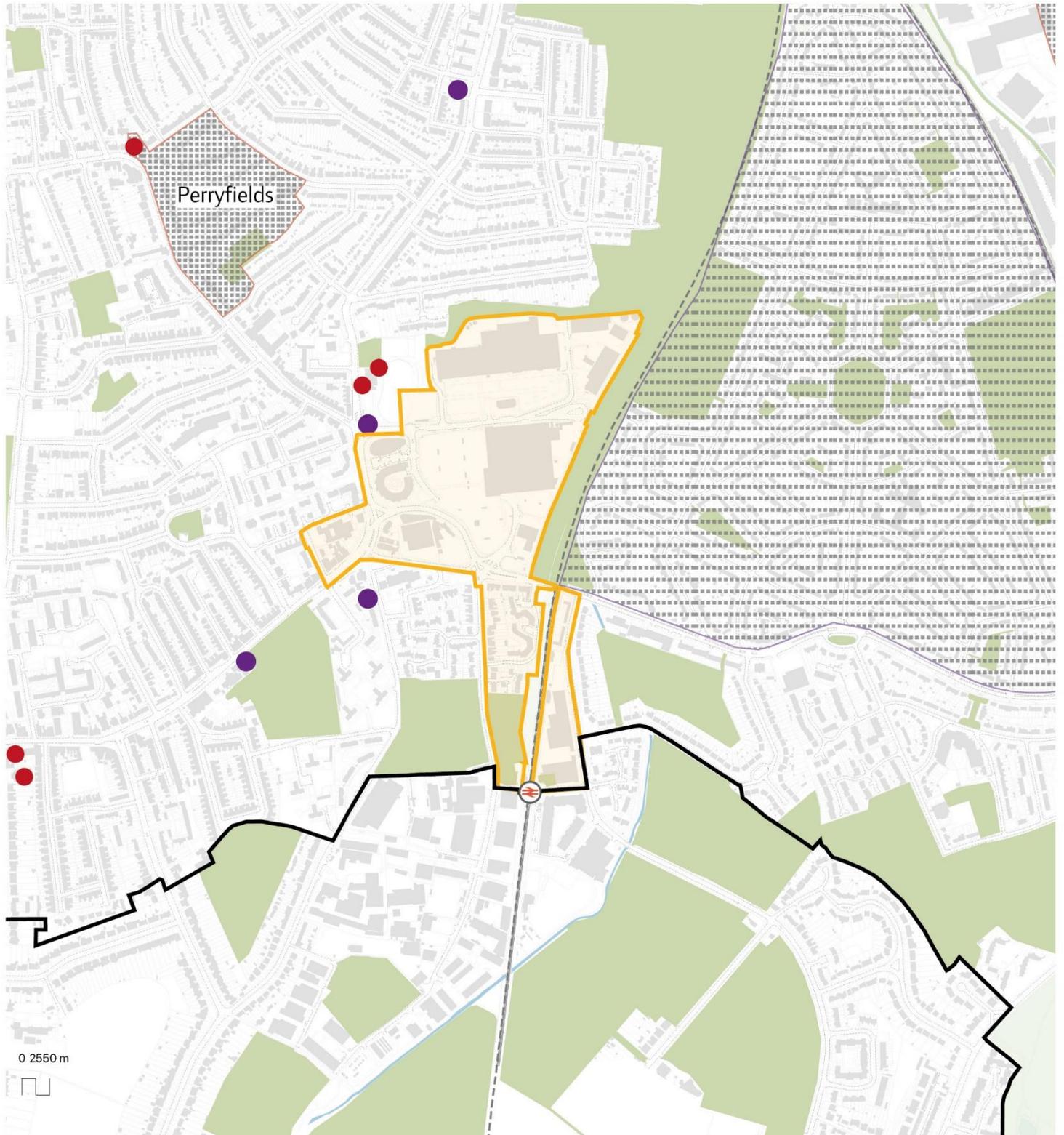
Bell Green

- 4.47. Paragraph 17.4 of the emerging local plan describes the character of Bell Green as containing *“an expansive out-of-centre retail park, which includes large format commercial buildings and associated car parks. These retail uses are adjoined by the site of a former gas holders which has been dismantled. Several developments have recently been built around the edges of the retail park.”* It further highlights these sites in the future vision of Lewisham, stating *“the role and character of large tracts of commercial land in Bell Green ... will be re-imagined to provide a high quality, mixed- use neighbourhood. This new focus for community and commercial activity in Lewisham will act as a catalyst for growth and investment.”*
- 4.48. Tall buildings are therefore seen to play an important role in the viability of the regeneration of Bell Green, particularly on larger sites with limited sensitivities. However, a key assumption within previous studies was the delivery of the Bakerloo Line Extension (BLE) to facilitate a significant step change in density with tall buildings clustered around a new public transport hub. Given the increasing uncertainty around the delivery of the BLE Officers believe that the scale of development should be reduced. The site is still a significant opportunity for redevelopment and appropriate for Tall Buildings but should be commensurate to its accessibility and the wider spatial hierarchy of town centres within the Borough.
- 4.49. Therefore the heights within this review propose a reduction to those identified within the Tall Building Addendum 2022 for this area.

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
BG1	Southern corner of former gas works site	N		Site Allocation 1 (South Area)	Heights to be considered alongside existing context, up to 16 storeys may be appropriate: although Proximity to Gr II Listed Livesey to be taken into consideration
BG2	Bell Green retail Park, single story big box retail consisting of B&Q/Aldi Site/Merc site - SE26 4RS. Strategic open land to north as well as east of site along Pool River	N		Site Allocation 2 (South Area)	
BG3	Sainsbury's Bell Green, including petrol station to south of site. Strategic open land to east of site along Pool River	N		Site Allocation 3 (South Area)	
BG4	Sports Direct/ residential block bounded by Alan Pegg, Bell Green and Ron Stockbridge Rd.	Y	Recently developed	Up to 8 storeys (residential block)	
BG5	Stanton Square Locally Significant Industrial Site - 3 storey storage facility, parking and adjacent scaffolding storage yard	N		Site Allocation 4 (South Area)	Reduction in height to respect adjacent lower rise residential

					areas – max 12 storeys
BG6	C20 Terraced buildings bordering Stanton Square and on the corner of Sydenham Road and Bell Green. Formed of corner pub, 'The Old Bath House' and apartments to Stanton Square and two storey terraces of high street function opposite the road	Y	sensitive/transition site – adjacent low rise housing		
BG7	Sydenham Green Group Practice	Y	sensitive/transition site – adjacent low rise housing	Site Allocation 5 (South Area)	Tall buildings in this location would unduly impact on neighbouring residential areas
BG8	Victorian terraces and C20 housing along Southend Lane and continuing south along Fambridge Close until Thomas Dean Road; Corbett Close - C20 housing on corner of Southend and Worsley Bridge Road	Y	essential community need – housing		
BG9	Lewisham indoor bowls facility and adjacent open green space/playing fields. Opposite Lower Sydenham train station	Y	Designated - LGS		
BG10	Worsley Bridge Road Locally Significant Industrial Site	N		Site Allocation 6 (South Area)	Appropriate for intensification due to adjacent train station, max 12 storeys may be acceptable

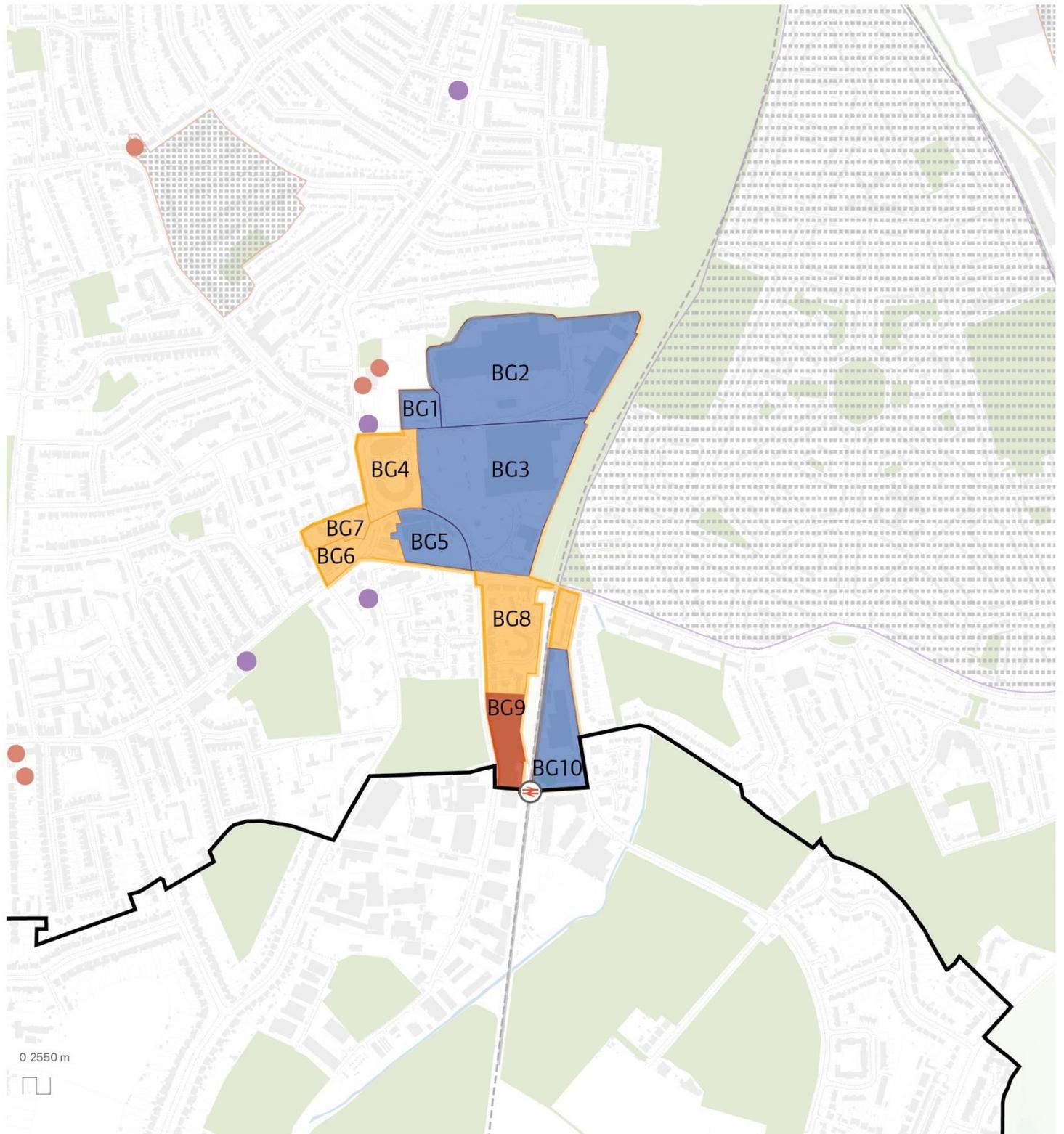
BELL GREEN - Existing Context



KEY

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-  Conservation Area
-  Area of Special Local Character
-  Train Station
-  Gr II Listed Asset
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-  Lewisham Borough Boundary

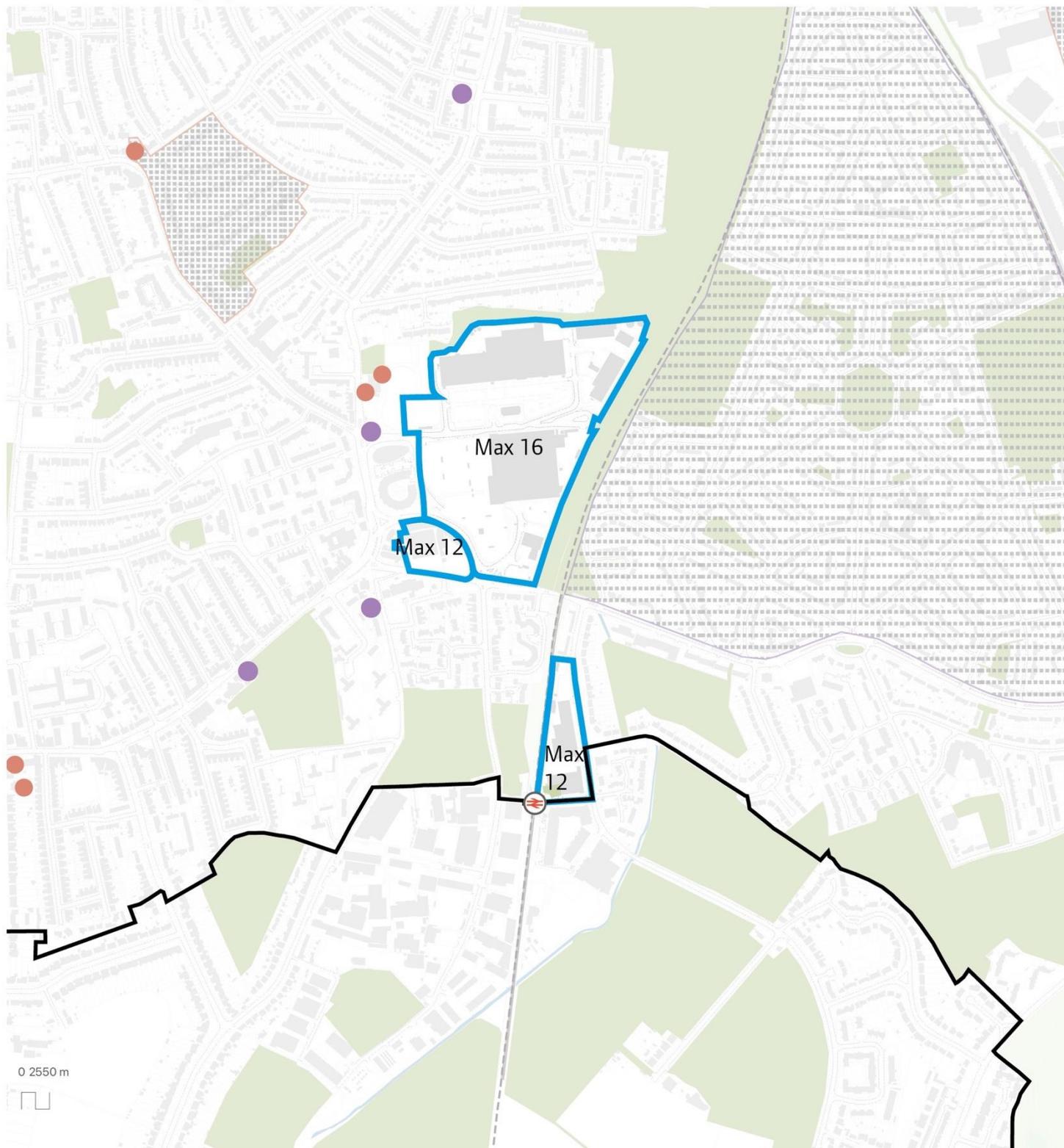
BELL GREEN - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

BELL GREEN - Emerging Character



KEY

 Refined Tall Building Suitability Zone

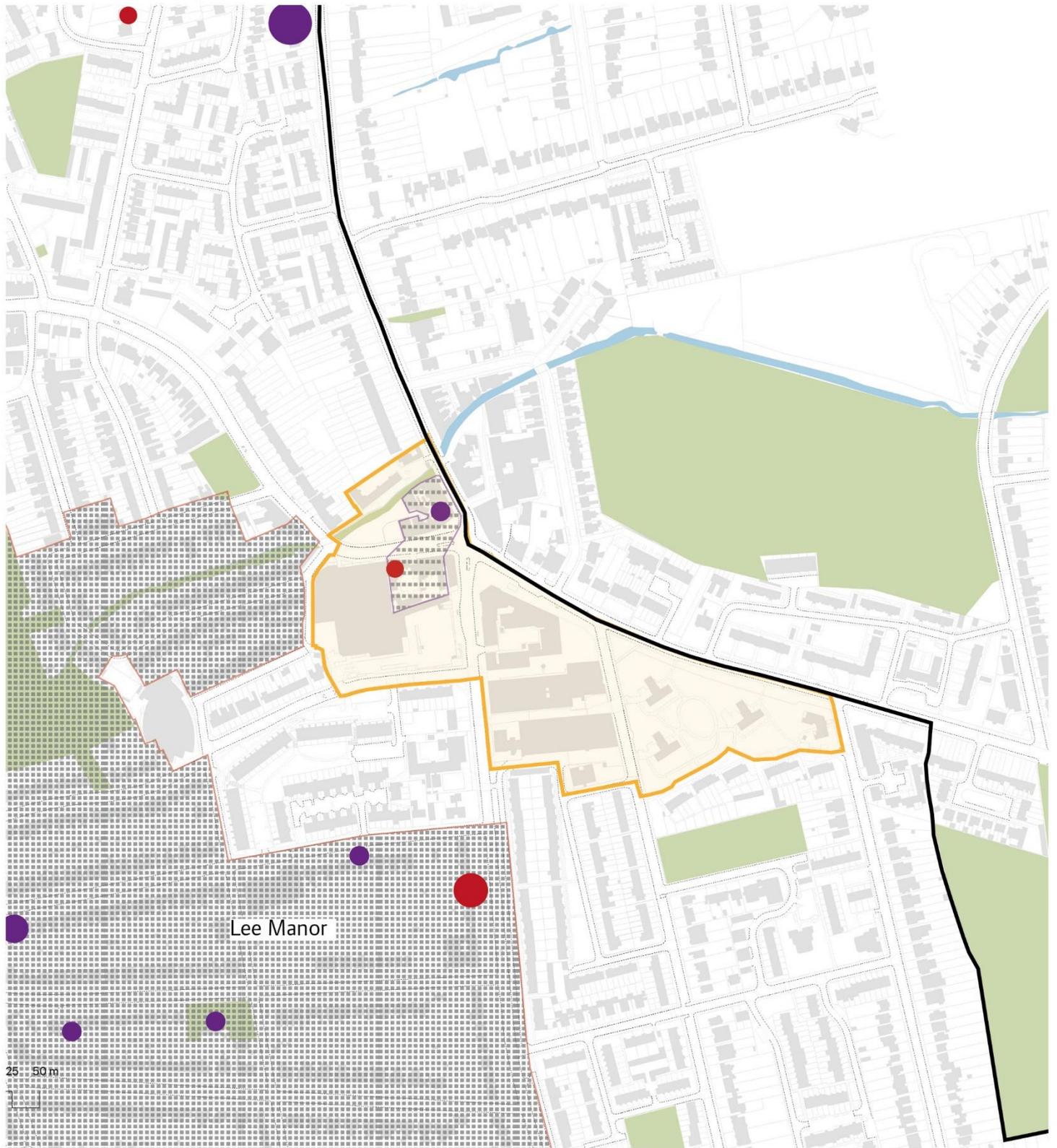
Lee Green

4.50. From Lewisham’s Local Plan, paragraph 16.2 describes Lee Green as having a “*distinctive historic character with a significant number of listed buildings. It is one of the Borough’s smallest District Centres that serves the local neighbourhood and communities with a mix of shops and services. It includes several large format retail units and the Leegate Shopping Centre, the latter of which was built in the 1960s. The centre suffers from areas of poorer quality public realm, with two busy roads forming a junction that dominates the centre of the High Street. Vacancy rates indicate that Lee Green is not performing as well as other District Centres in the Borough.*”

4.51. One of the key spatial objectives set out for Lewisham’s east area is to revitalise Lee Green District Centre, with improved public realm and high-quality, mixed-use developments with genuinely affordable housing “*through the renewal of Leegate Shopping Centre and other town centre sites. Improve movement and safety within and through the centre by addressing the dominance of vehicles and traffic congestion at the centre’s main junction.*”

Key	Step 1: Characterise	Step 2: Exclude		Step 3: emerging character/use	Step 4:
		Y/N	reason		
LG1	Block consisting of BMW car dealership site; and c21 River Quaggy Apartments behind	Y	Recently developed, constrained site	Site allocation 5 (east area) calls for the sensitive intensification of the site, maintaining the unique characteristics of the existing urban fabric.	tall development would not be possible due to site size and sensitivities
LG2	Gr II listed Lee Police Station and adjoining c20 high street buildings. C19 terraced parade opposite the police station consisting of locally listed The Old Tigers Head Pub. Together these sites form an area of special local character which positively contributes to the character of Lee High Street	Y	Designated – Gr II listed; asset – locally listed, area of special local character		
LG3	Sainsbury’s Site, bounded by Lee High Rd, Hedgley St, Taunton Rd and 20 th century terraces adjacent to the Gr II Listed Police Station at the corner of Lee High Rd and Burnt Ash Road	N		site allocation 4 (east area)	Max 12 storeys stepped back from main road to respect setting of Lee Police Station
LG4	Post-war Leegate shopping parade + adjacent car park,	N		site allocation 3 (east area) Full application DC/14/090032 received resolution to grant in May 2016	Max. 12 storeys
LG5	Merridale Tower and Leybridge Estate, post-war residential point towers and in the case of Leybridge Estate, set within large communal gardens	Y	Essential community need - housing	Existing towers: up to 11 storeys	

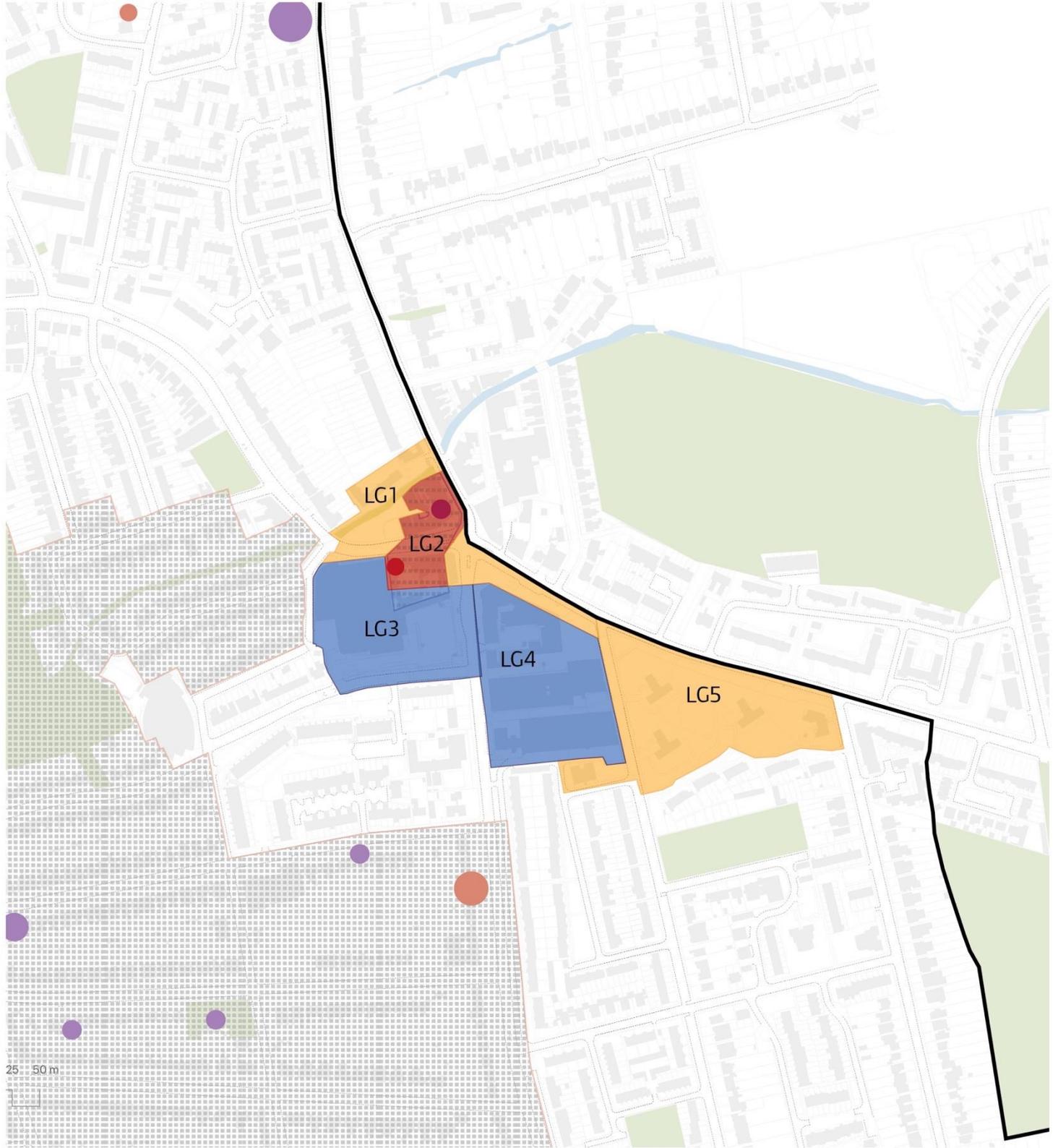
LEE GREEN - Existing Context



KEY

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-  Conservation Area
-  Area of Special Local Character
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-  Locally Listed Asset
-  Lewisham Borough Boundary

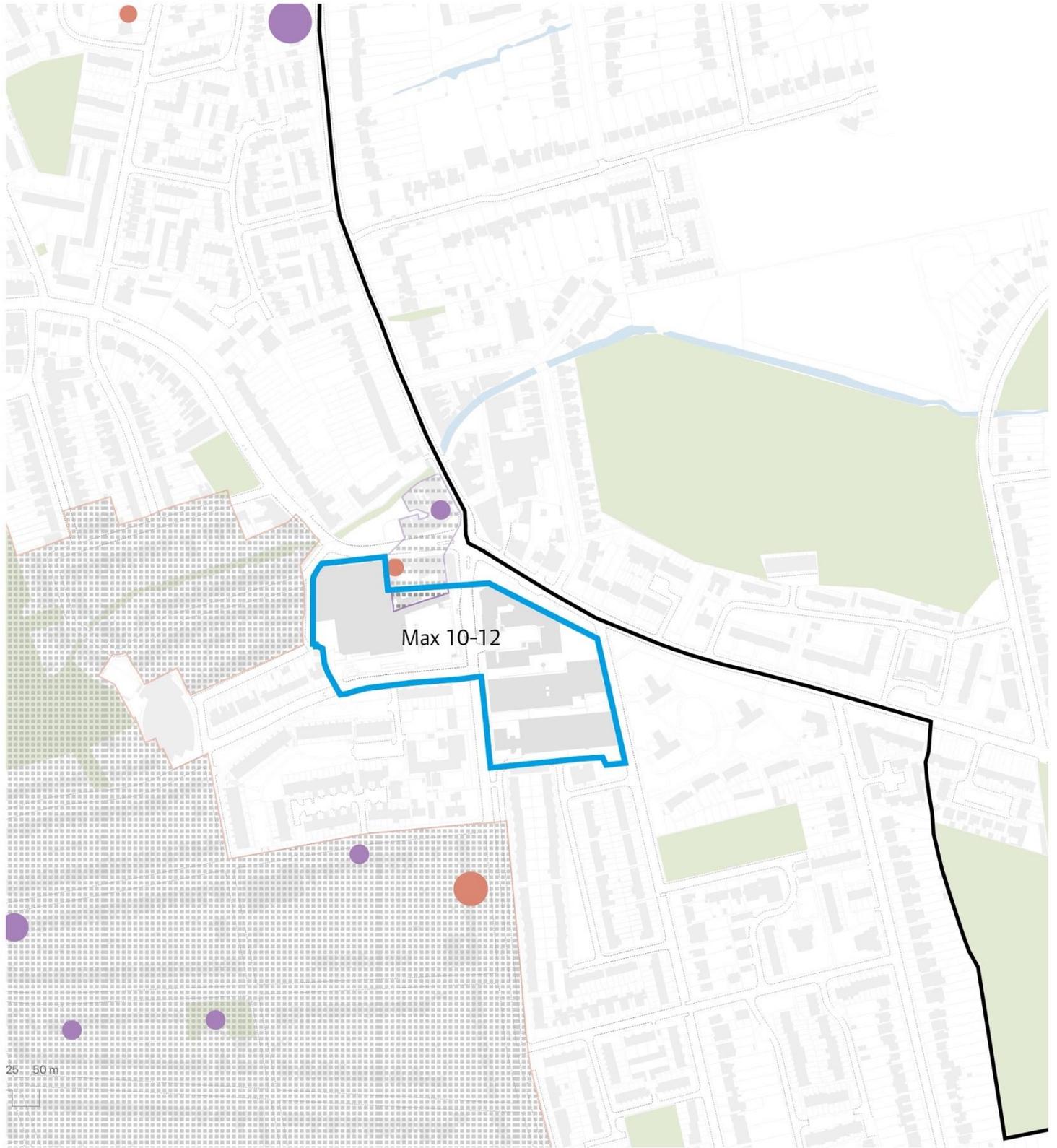
LEE GREEN - Character Study



KEY

-  Sites that may be suitable for tall buildings
-  Sites not suitable for tall buildings with particular sensitivity to tall development
-  Sites not suitable for tall development

LEE GREEN - Emerging Character



KEY

 Refined Tall Building Suitability Zone

5. Conclusion:

- 5.1. The result of this work is a tighter boundary of suitability for tall buildings in seven of the eight areas identified in the Tall Building Addendum, with one area being eliminated entirely. Maximum heights within each of these areas has been derived based on an analysis of the emerging context.

- 5.2. This background paper with accompanying tables and maps will help to ensure that Lewisham's new local plan provides clarity for communities, developers and decision-makers, including Council officers, about the appropriateness of tall buildings in different parts of the borough.